From: Office of Clive Betts [redacted]
Sent: 11 July 2025 15:56
To: SheffieldPlan
Subject: Correspondence from Office of Clive Betts MP - Local plan consultation submission
Attachments: Written submission to Planning Inspectorate - Green belt release.pdf

Good afternoon,

Please find attached Clive Betts MPs submission for the local plan green belt allocation proposal.

In addition, Clive would also like to attend the hearings in October.

If there are any issues please let us know

Kind regards,

Michael Chilton
Office of Clive Betts MP

Written submission to Planning Inspectorate –

Green belt release for housing

1.0 Introduction

Earlier this year the Inspectorate requested Sheffield City Council to find an additional 3527 houses to meet the target required by the local authority. After an internal consultation, the Council published their proposal in May that saw several sites proposed for green belt release.

Specific to the constituency of Sheffield South East that I represent, three sites were identified- White Lane (S02898), Handsworth Hall Farm (SES29), and Beaver Hill (SES30).

While I recognise the need for a local plan, as well as the important housing targets set out by this Government, I do not believe the green belt allocation proposal is sound. As I will set out below there are both general and principled objections as well as site specific concerns that means I cannot support the local plan in its current state.

In this submission I will cover these general and principled objections, specific concerns with the three sites proposed, alternative sites that would make a far better local plan, issues with the consultation itself, some possible ways forward, before concluding remarks.

2.0 Principled and general concerns

Before my concerns about specific sites, I wanted to outline my general concerns that have implications for all three sites in Sheffield South East as a cumulative whole. These are catagorised into the unequal split of sites across Sheffield, traffic infrastructure concerns, and the air pollution related to the latter congestion.

As an aside I am conscious that the local plan has set out the projections for school and GP places with regards to what will be needed to support these sites alongside the standard projections for the area. For instance, I accept that the current pressure on primary schools will transition to secondary schools by the time this plan is in which has been outlined in the plan. We must be clear though that if these projections change, or if for whatever reason there is a demand on these services that was not there had the greenbelt sites not gone ahead, then these will be met before development goes ahead. They cannot be promised at the end and then never appear.

These are very much dependent on the new ‘golden rules’ for building on green belt set out by the Government. These have not been significantly tested yet, but they do have to be absolute. No single area should be worse off as a result of the local plan, especially any areas where green belt sites are considered for development.

2.1 Fairness in distribution of sites

My chief and overriding concern with the green belt allocations as they have been put forward by Sheffield City Council is the fairness of them. The distribution of sites is quite profound with the East and North of the city taking up the overwhelming majority of this new allocation while the West takes little to no new development.

Sheffield South East alone in these proposals is facing 1,942 additional homes on green belt land, over half of the entire shortfall of houses (3527).[1] Compared with the West of the city the contrast is stark and reflects very much a tale of two cities.

Of that 1,942 figure Handsworth, which is just one community in my constituency, is facing 1638 houses[2] on their green belt land. This is 44% of the entire city's allocation of housing on green belt but represents a huge loss of not only the community's green belt land, but also green/open space. In effect this plan is stripping this community of all their green belt and green space. This is not fair.

Sheffield is made up of six constituencies, one surrounded by five that form the city border. If we exclude Sheffield Central as it has no green belt land, the expected fair split of housing sites would be 3527 divided by the five remaining constituencies, which comes to 705 houses. Now it is completely understandable that this precise split of development will not happen, but it should at least be a goal to aim for by the planning department, and that clearly has not happened. The geographical disparity in housing is stark and places a larger unfair burden on communities in the city while protecting others.

The other point that cannot be ignored here is that this geographical skew of sites is underpinned by a wealth and health disparity across the city. Life expectancy in the west of the city is dramatically more than it is in the east of the city where my constituency and Handsworth resides.[3] This correlates with Handsworth being more deprived than the West of the city[4] reflected in its comparative lack of amenities, services, and green spaces.

I highlight this specifically to the Inspectorate to underline how valuable these green open spaces are for a community like Handsworth that have significantly less green belt than other parts of the city. Any sound local plan should be reflecting on these significant disparities across the city and ensuring that those who are worse off are protected from further removal of things like green belt land and development that will inevitably put further pressure on services and infrastructure that is already struggling. This development will not help these communities live longer or better lives, but actively contribute to the strains they are already under.

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[1] Draft Sheffield Plan Proposed Additional Site Allocations: Selection of Sites for Green Belt Release Topic Paper – May 2025
[2] Ibid
[3] Life Expectancy in Sheffield, UK (https://gis.sheffield.ac.uk/public-health#h.dv6kt7t5m7qa)
[4] Ibid

These proposals would see the near total removal of the green belt for Handsworth. The Covid pandemic and subsequent lockdowns taught us the value in these spaces, and to take them away in virtually their entirety from one community seems demonstrably unfair. When residents have contacted me about this proposal one of the stories I regularly encounter is how these places helped them through the lockdown period and kept their mental health in check. This reflects not only with my own experience but the work of the Housing, Communities and Local Government Select Committee which identified the importances of open green spaces in urban environments for residents' mental wellbeing. I do not see how these proposals are conducive to that and run in direct contradiction of what we know to be true about green spaces for communities in urban areas.

I have asked the Council directly if they have the data for the amount of area green belt makes up in each of these wards, but surprisingly the planning team did not have this information to hand. It is worrying that the Council themselves do not have these figures and are willing to make such sweeping decisions without them.

As the Council were unable to source these figures, I was fortunate enough to have the University of Sheffield Geography Department assist my office in procuring the figures. I believe they are quite telling and underline the concerns over fairness.

Woodhouse ward (which includes Handsworth) has 357.7 hectares of green belt. The two sites in question total 93.47 which equates to just under a third of all the green belt being removed. For Handsworth specifically this is nearly all the green belt land with the remainder being in Woodhouse. In comparison Dore and Totley have 876.1 hectares while Fulwood has 787.4. These figures[5] clearly underline the disparity the south east of the city faces in comparison to the south west.

The final consideration that needs to be highlighted for the Inspectorate with regard to fairness is how it impacts not just the area with the development, but also the rest of the city where there will be a lack of development.

What this current proposal to the Inspectorate effectively outlines is that if you want to live in certain parts of Sheffield, you are far less likely to secure a home compared to areas where there will be development on green belt. It strikes me as incredibly unfair that someone who wants to live in Dore and Totley, Fulwood or Lodge Moor will be far less likely to secure a home due to the unequal spread of these sites.

This does not help in the task of making the local plan sound as it is effectively gating off certain areas of the city. In that sense it is as unfair for those areas and the people who may want to live there as it is for the areas currently being burdened with a disproportionate amount of development on green belt. No thought seems to have gone into this and as a result areas of the city that are very desirable for some people are becoming increasingly inaccessible.

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[5] Data from https://www.planning.data.gov.uk/dataset/green-belt#

In summary, if these proposals go ahead as is then the geographical inequality and unfairness already present across Sheffield will only deepen. That is not sensible planning and does not represent a sound local plan that will benefit all of Sheffield and its residents.

2.2 Congestion and traffic concerns

The specific concerns around each site's traffic problem will be detailed further in my submission, but as a general point I wanted to raise concerns around traffic flow and the continuing problems we have with traffic and congestion in Sheffield South East. This is despite repeated promises that these would be addressed, even within the local plan itself which has not happened.

If my constituency is expected to take on more housing, then there should be the improvements to transport infrastructure to match. There are already several developments in the Local Plan such as the Scowerdon Estate, Norton Aerodrome, and the development to the north of Beighton Road in Woodhouse. At no point have I seen a joined up long term strategy to deal with the congestion and traffic these proposals will all produce.

There are already key parts of the road network in Sheffield South East that are at or over capacity and struggling to deal with the current levels of traffic. Eckington Way in particular has already been discussed during this local plan process with concerns over the proposed light industrial and traveller site and the impact it would have on congestion. In my submission for that issue, I raised the point that planners had promised infrastructure improvements for the area over many years with a commitment to deal with the issues in the local plan. I will not repeat those concerns in detail, but again I do not see the level of strategic thinking from the Council to deal with the current issues around congestion and traffic and the proposals to mitigate further usage is negligible, amounting to only small specific changes rather than something more ambitious to help deal with this problem.

Specific to the proposed green belt allocations I have not found any actual traffic monitoring data from the sites in question which I find even more worrying. The documents that relate to road traffic and mitigation[6] [7] [8] all consider modelling and forecasts for 2029 and 2039 without any reference to current data as to the state of the road network. As far as these reports show no actual traffic monitoring or surveys have taken place on the roads surrounding the two Handsworth sites (most notably Retford Road, Beaver Hill Road, Handsworth Road, Highfield Lane, Orgreave Lane and Rotherham Road) or the White Lane site (White Lane).

The question then is, how can these proposals be sound if there has been no recent monitoring or data from these roads? It is incomprehensible how Sheffield City Council can look to build on green belt without having done the proper and full assessment of the surrounding road networks, forecasts and projects as

[6] Transport Assessment: Report on the Strategic Road Network Impacts and Potential Mitigation
[7] Transport Assessment: Report on the Strategic Modelling Results
[8] Transport Assessment: Report on Local Road Network Impacts and Potential Mitigation

a substitute is just not acceptable. The planning department have informed me that this is normal practice and that surveys and monitoring will take place at the development stage, but when you have such significant sites such as the two Handsworth ones, it seems negligent to not do some of that work now, otherwise it will undermine the deliverability of the sites if the traffic is found to be so significant that the sites are no longer viable.

To underline the history of traffic and congestion particularly in the Handsworth area specifically over a decade ago there was a recognition that the combined traffic was becoming a problem, and a proposal was put forward to build a link road.[9] This was in recognition that the Waverley development would create further congestion. Unfortunately, the proposal never went ahead due to Yorkshire Water refusing to sell the land needed to build on. This should indicate that the congestion on the road network is already serious enough to have warranted a significant road project to alleviate the pressure fifteen years ago. With nothing done since then the traffic has only worsened and these two exceptionally large sites will only continue this trend.

Residents who live locally will I am sure underscore and illustrate this point with their own firsthand experiences of the traffic, particularly at peak times. I have had accounts of how journeys that should take ten minutes can be double that, and how even the slightest disruption causes massive ramifications for the road network that is struggling to accommodate the levels of traffic we are seeing. Only recently temporary traffic lights went up in the area which caused chaos at the time and residents highlighted how precarious the road network was.

2.3 Air pollution

Following on from the congestion and traffic concerns it is important to highlight that (largely due to the congestion and traffic) the two Handsworth sites are both in, or close to air quality exceedance area. These developments will undoubtedly contribute further to this. There appears to be no serious recognition or mitigation despite this.

Especially as these are green belt sites the further worsening of air pollution in the area should be addressed in the appraisal and site assessments rather than just simply recognised. Real efforts have been made to improve air quality in the city centre through schemes like the Clean Air Zone (CAZ) and we should expect similar ambition in the suburbs.

[9] Waverley Link Road Consultation Document

3.0 Site specific concerns

Having set out these general concerns and objections regarding the overall allocation of green belt sites, I want to make some specific comments on the three sites proposed in my Sheffield South East constituency in addition to the above.

3.1 S03061 - Handsworth Hall Farm, Land at Finchwell Road, S13 9AS

I am supportive of this development given the need to meet our housing targets, but there are several practical concerns that do need addressing before this site is improved.

First and foremost, I believe this site is only viable on the basis that the Barrow Hill line can be reopened with a tram train service to provide regular public transport for the development and the surrounding areas. Given my above concerns with traffic and congestion, I cannot justify hundreds of new homes without that pre-requisite.

Therefore, we need to be clear that any development here needs to happen after, or alongside, the introduction of the tram train along this route. It is not sustainable to build on this site and then anticipate better public transport connections. This would fly in the face of the golden rules set out under this government ("necessary improvements to local or national infrastructure").[10] This needs to be clearly set out in any conditions for developing this site.

Beyond just this site, the Sheffield section of the Barrow Hill line also represents a vital opportunity to deal with congestion more broadly. Any tram train service would connect Darnall, Waverley/Handsworth Hall Farm development, Woodhouse, Beighton and Rother Valley Park. The infrastructure in southeast Sheffield has just simply not kept pace with development, but this tram train would represent a significant step forward to addressing that. This could therefore come as a net benefit with better connections for the wider area.

I am also aware of the proposal to build a heavy rail station at the northern edge of the Handsworth Hall Farm site. This proposal is linked also to Waverley with the development there nearly complete and would see a further stop on the Sheffield to Lincoln line.

To be clear, this new station cannot be a substitute for the tram train proposal or be seen as sufficient in fulfilling the transport infrastructure in line with the golden rules set out by the government. The station's construction will only provide an extra stop on the Sheffield to Lincoln service, not an increase in the number of trains servicing the route.

The current service offers one train per hour to Lincoln and one train per hour to Leeds (via Sheffield). Woodhouse station, which is immediately southeast of this new proposed station, sees an average of 92 passengers per day,[11] while Darnall station (immediately to the West of the proposed stop) has an average

[10] National Planning Policy Framework (page 46)

[11] Railway data (https://www.railwaydata.co.uk/stations/overview/?TLC=WDH)

of 55 passengers per day.[12] These two figures I believe are indicative of what the proposed Waverley station would achieve.

It is clear that a heavy rail train that only runs once per hour in each direction does not provide the level of public transport infrastructure required or expected as part of the Government's golden rules and would not be able to properly serve the combined developments of Waverley and Handsworth Hall Farm.

A dedicated, far more regular service, in the form of a tram train with more stops that provides greater access to Sheffield city centre is what is required. There can be no substitution of that proposal for the heavy rail station as they are manifestly different, with the latter being completely insufficient for the level of development proposed on this site in conjunction with the existing development of Waverley. Therefore, there should be a clear planning restriction on this development that any work can only begin either after or alongside the reopening of the Barrow Hill line with a tram train as the Waverley station proposal does not meet the Government's golden rules for development.

Another concern is the current proposal and site appraisal details seem to indicate the employment land allocated for this site will be in the northwest part of the site. This seems counterproductive for a) access to the site and b) location of the railway line/tram train.[13]

From my current understanding, the site will be accessible from the east and south of the site. It is therefore difficult to understand why the employment portion of the site would be at the furthest point from this; it would make more sense for it to be closer to preventing traffic and congestion throughout the new development.

A related concern is that the employment land is not following the train line to the north of the site. It would make sense to use the employment land to function as a buffer between the train line and the residential part of the development. This would not only help deal with noise disturbance but also has the ability to create an effective high street for the development with shops alongside etc.

It also does not help that the particular type of employment has not been specified. Offices and other B1 business use would obviously be appropriate for this sort of development, but more industrial employment would not be. There is no stipulation for this, only "general employment zone."[14]

This particular point does give the appearance that the planning service has simply sliced the site in two to provide the required employment space rather than provide a more thoughtful approach to what the site could be, and what opportunities it could also unlock. While they may argue that this is a consideration for a specific planning proposal or the master planning stage of the development, I have serious reservations that a lack of detail now is reflective of how this will be managed going forward. Especially as this is release of green belt, we need to ensure the absolute best plans are being put forward. This line

[12] Railway data (https://www.railwaydata.co.uk/stations/overview/?TLC=DAN)
[13] Sheffield Plan: Proposed Additional Sites Allocations May 2025 (page 42)
[14] Ibid

drawing exercise for me suggests that this is not happening and is something that can be left for a developer to administer. It is the Council first and foremost who need to ensure that if this land is released it is being done so in the best way possible with clear requirements and stipulations for how it will benefit the local community.

Finally, I have a few smaller additional points that I do not think the Council have considered. Firstly, I have had reports from residents that the section of Finchwell Road nearest the site is privately owned by a resident who has made clear they are not willing to sell. I also note that this particular site has no access points suggested by the planning team. From my own view of the site, I would assume that Finchwell Road would however have to be one of them. If this is the case the Council need to address to issue as it directly effects the deliverability of the site.

Secondly, I am conscious the Council have tried to address the current lack of burial space within the local plan. Whilst I am against this very last-minute attempt to fix a separate problem, I want to be constructive with it now that it is in the plan. Currently the Council have outlined a burial site as part of the Beaver Hill site development. What I do not understand is why they are looking to build a new burial site there while there remains a cemetery off Orgreave Lane that could much more easily be expanded. This seems to be a common-sense approach rather than building an entirely separate cemetery close by.

In summary I want to support this development, but this support is not possible without the tram-train. There is no way I can endorse this site without that condition being met as set out in the golden rules. No substitute like a heavy rail station will make up for this, and it would fall well short of the transport infrastructure requirement as set out by the Government. There are also a number of other concerns that I have raised that I believe cannot wait until the planning application stage, and the Council should be proactive in addressing these now ahead of the local plan being agreed.

3.2 SES30 – Beaver Hill site, Land between Bramley Lane and Beaver Hill Road, S13 7JH

I do not believe the Beaver Hill site is at all appropriate or sound for development. Not only is it one of the last principal pieces of green belt for the communities surrounding it, but it constitutes acute overdevelopment of Handsworth while other parts of the city face comparatively little.

My first specific concern for this site relates to the repeated flooding year on year at the bottom of Beaver Hill Road. This has caused significant disruptions in previous years[15] and falls within Flood Zone 3[16] which means it is at a high risk of flooding. Not only does this have a direct impact on the flooding of Beaver Hill Road, but it also causes issues with the potential access to the development (the site appraisal states that

[15] Yorkshire Live article: Bus submerged in water as Woodhouse Road floods.
[16] Flood map for planning (https://flood-map-for-planning.service.gov.uk/map?cz=441847.8,385462.7,18.479196)

the main access point would be Beaver Hill Road with other access points on Beaver Avenue and Bramley Lane).[17]

While the site itself is within Flood Zone 1[18] Beaver Hill Road is a clear and persistent flooding risk, and development on the Beaver Hill site will only increase this risk with a lack of run off and soil to absorb rainwater. The Strategic Flood Risk Assessment Update does not address this issue, presumably because it is not directly on the site, but it cannot be ignored given the impact it will have on the site and surrounding area. I have seen nothing in the associated documents that indicates this repeat flooding at the bottom of Beaver Hill Road will be mitigated for. The development will only make it worse, and the road is being relied on as an access point, yet this is not sound as the flood risk will only increase, preventing the use of this important road.

My other concern related to this issue is the Assessment Update states that an eight-metre corridor should surround the unnamed tributary coming off the site.[19] This restriction is not explicitly considered in the Council's own appraisal of the site (only the 15-metre environmental buffer is). If this restriction has not been considered, then this will impact the proposed housing number that this site has been allocated. It would not be sound to say the site can contain as many houses as currently stated.

The reason it was not featured in the Council's own appraisal (as I understand it) is the Assessment Update was only commissioned after this site was proposed as one of the green belt sites. I want to highlight this specifically as it perfectly reflects the planning team's approach in general which seems to be outcome first and then finding the reasons to justify it. I am astounded that this site was proposed and then these reports were commissioned, although it explains how these specific problems have emerged. I would also not be surprised if this impacted other sites deliverability as well.

As a result of this approach either the Council cannot build the number of houses on this site that they previously proposed, or the site is not deliverable due to the constraint of the tributary. It has to be one or the other, but this should reflect quite poorly on how this plan has been formulated where it appears the sites were chosen and then a great deal of the work done to see if they are suitable.

Related to this is the access issues mentioned above. Beaver Avenue and Bramley Lane are totally inappropriate access points for this level of development. The Council are effectively proposing that roads that service two smaller estates will service the larger proposed development. These regularly have cars parked on either side making it exceedingly difficult to navigate up and down. It does not seem practical or sound to suggest they are used as access roads this site, especially considering emergency vehicles who will need access.

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[17] Draft Sheffield Plan Proposed Additional Site Allocations: Selection of Sites for Green Belt Release Topic Paper – May 2025 (page 42)
[18] Sheffield Level 2 Strategic Flood Risk Assessment Update – Site S03020 (page 5)
[19] Ibid (page 21)

I note that a site in the west of the city had been discounted for these reasons. S03052 was not brought forward to this stage because "access could only be achieved from existing residential roads at Moorcroft Close and Moorcroft Drive."[20] I fail to see how that can apply to that site but not this one.

The alternative point of access suggested by the Council is Beaver Hill Road, however this seems impossible given the above restriction on development within eight metres of the unnamed tributary. Said tributary runs from the middle of the site along the boundary of the smaller parcel of land to Beaver Hill Road. I do not therefore see how the access road can be laid between Beaver Hill Road and the estate without either being at the lowest point where the flood risk is greatest, or without clashing with the restriction around the unnamed tributary.

In summary, it is not clear how access to this development would work. The specific roads outlined in the appraisal are not practical, and the suggested alternative has been ruled out by the Risk Assessment Update. This does not strike me as sound and the access to this potential site is seriously undermined.

Another concern I have is a particular parcel of land on this site (S02502) is clearly of some ecological value beyond just farmers' fields which I accept the majority of the site is. This is the northeastern portion of the site running next to Beaver Hill Road.

As I understand it this site was originally one of two sites that now make up the Beaver Hill site, the other one being S03020. At this stage S02502 would not have been considered to develop as it is considered an open space. Comparable sites were excluded from the proposal for this very reason.[21]

Worryingly as a way around this S02502 seems to have been combined with S03020 to form SES30 to try and circumnavigate this point, seemingly because Beaver Hill Road is seen as the best access point for the estate (despite the above issues). This does not seem very open or honest as part of the process and it should raise questions over why this site was treated this way compared to others where they could have possibly increased the area to include areas that were not considered Urban Green Space.

From resident's reports and my own visit, I have seen evidence of bats (both common and soprano), woodpeckers, buzzards, red kites, badgers, and deer. This is an ecologically important site, more so than the other land described in these proposals. As a result, it is hard to see how any ecological survey will permit the level of development being proposed, especially if it for an access road (putting aside the above concerns already raised about that).

I would therefore strongly recommend that at the very least this particular parcel (S02502) not be considered for development given the issue over the access point, as well as the ecological value of the area in comparison to the rest of the site.

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[20] Draft Sheffield Plan Proposed Additional Site Allocations: Selection of Sites for Green Belt Release Topic Paper – May 2025 (page 253)

[21] Ibid (page 6)

Having already covered my general reservations about the traffic appraisal for these proposals I do want to specifically comment on the improvement aimed at making this site viable which is to create a three-arm priority junction at Reford Road/Beaver Hill Road.[22] Aside from the fact there is no actual traffic monitoring to underpin the argument for this mitigation I fail to see how this would improve traffic flow. It should also be noted that in the transport assessment report the original consideration was for a roundabout at this location, but that space constraints prevented this,[23] suggesting this junction solution is already sub optimal and not the ideal way to solve the congestion problems.

I have no doubt that a three-arm priority junction would make the area safer to drive along, but I do not understand how the planning department believe it will ease traffic flows, especially as they will increase with this development. On the assumption this priority junction will prioritise the road traffic on Retford Road and not Beaver Hill Road (which would be the access point to the estate) the congestion and traffic will increase on Beaver Hill Road significantly.

As a result, I do not believe this site is deliverable from what the council planners have set out. The access points are ill thought out and unclear with the ones named in the planning documents not practical for such a large estate and the other proposal (Beaver Hill Road) in contradiction to the flood assessment, as well as destroying an ecologically significant habitat. The flood risk itself has not been addressed with pervasive problems on Beaver Hill Road which will only worsen if the site is developed. Finally, the traffic mitigation outlined does not address the increase in traffic expected on Beaver Hill Road which will be the main access point to the development. This site is not thought out, not deliverable and therefore not sound.

3.3 SS19 – White Lane site, Land to the south of White Lane, S12 3HS

Similar to Handsworth Hall Farm I could be supportive of this development, provided the following concerns are addressed. It is close to the existing tram network and geographically makes sense. However, I do have specific concern for traffic and congestion in the area, as well as issues over access.

White Lane faces not only traffic from cars but also services the Sheffield tram network making it particularly important and well used by both private vehicles and public transport. From looking at the traffic reports on this White Lane has not even been modelled which is worrying. This development will have an impact on this road, as well as the Fox Lane junction. It would be reassuring if a study could be done on this to mitigate the increase in traffic to see this site as deliverable.

In particular there is no acknowledgement about how bad White Lane can be, especially during peak times like rush hour. This is compounded by the tram. If a car breaks down, or if there is any disruption on White Lane then the entire network beyond White Lane tram stop is shut down. Given the importance of this road as not only a route for traffic but also how it serves the tram network far greater thought needs to be given to development along it.

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[22] Transport Assessment: Report on Local Road Network Impacts and Potential Mitigation (page 52)
[23] Ibid

Alongside this Bowman Drive is used as a rat run. The Council has made numerous attempts over the years to deal with this problem although it still remains. We have to accept this needs to be considered when it comes to building more houses in the area as it is a clear a continuing safety concern.

On the issue of access points the planning appraisal states that Carter Hall Lane would likely be the second point of access in addition to White Lane.[24] Currently Carter Hall Lane is a country lane which can only fit single file traffic. This would be totally inappropriate for a development of this size, yet there is no reference to this road having to be improved or widened to provide appropriate access.

I highlight this as other green belt sites have been discounted from this proposal due to reasons around a lack of suitable access roads such as S03069 – "There are highways and access constraints (access likely from a single-track road)."[25] I believe White Lane faces the same problem and there needs to be proactive work now to explain what will be required of any developer at the application stage, rather than deferring the problem to then. To compound this access problem while Carter Hall Lane would be a second access point it would ultimately lead back to White Lane, furthering the problem there. This directly impacts the deliverability of the site and needs to be addressed now if this site hopes to be considered sound.

In addition, residents for some time now have experienced repeat issues with their water supply in the area with eight separate occasions since October 2024 with Severn Trent. These have ranged from low pressure to no water supply at all. Any further development must therefore fix this issue as it is not sustainable to have these water supply issues affecting the area.

It should also be noted that this area has been recognised as having insufficient open space in the surrounding area (below the 20% policy standard).[26] It would therefore be useful if the Council could dedicate some time and resources to fixing this issue either before or alongside any development, potentially with money raised via a 106 agreement etc. This could be stipulated in the planning conditions for any potential development of this site.

Given this fact and the wider concerns about the number of houses in Sheffield South East a compromise solution could be development of this site, not to the current total, instead maybe 100-150 with the remaining area being used as a dedicated open space or outdoor recreational facility.

[24] Draft Sheffield Plan Proposed Additional Site Allocations: Selection of Sites for Green Belt Release Topic Paper – May 2025 (page 38)
[25] Ibid (page 269)
[26] Ibid (page 37)

4.0 Concerns about the consultation process

While this may not directly relate to the sites in question, I do believe I have to raise the inadequate and rushed consultation process. I accept that there is now an acute timetable on this process, but the Council should have firstly done more to argue for more time as well as understanding the requirements of a proper consultation process, rather than acquiescing to the bare minimum we have seen thus far.

To begin with, when these proposals were first announced and voted on at full council residents understandably had a great many questions, they were hoping to get answers for. These were submitted following the correct due process, but still, they remain unanswered. Instead, the Council provided a blanket response that does not respond to the specific points raised, many of them being technical in nature.

Following this, residents had to spread the news on the green belt release themselves. No written notice was circulated to them by the Council, even those living in close proximity to the sites proposed. A limited run of drop-in sessions was advertised although the overriding complaint I have had from residents is that the Council has either not been willing or unable to respond to the questions asked. Many of these are of a technical nature that neither I nor residents will intuitively know the answer to. To not be able to get answers within the consultation period undermines efforts to submit differing points of view on these sites, and therefore undermining the consultation process and making this plan sound.

To illustrate the problem, I held my own public meeting on the Handsworth proposals for residents. While councillors and I were able to answer some of the questions there were technical questions we were not able to. I said I would capture those queries and put them to the Council planning team to respond. When I contacted the team to alert them to this, I received the following response:

> "*Whilst we have sought to answer questions from the public over the consultation period as best we can, I am sure you will appreciate the challenges this presents from a resourcing point of view as we continue to facilitate the broader consultation process. Given this, rather than sending a list of questions from your event and seeking bespoke answers, I would ask you to encourage your constituents to send any comments they have at this point as formal representations that we will then pass to the Inspector. I cannot commit to providing answers to the questions asked at your meeting and remind you that this is not part of the process that has been agreed by the City Council.*"[27]

[27] Email from Sheffield City Council Planning Team

I am not denying that the planning team may be struggling with capacity issues, but this does not justify being unable to provide technical detail and answers requested by residents so they can make submissions during this consultation. How can my constituents be expected to submit useful comments when they still have questions unanswered? This really undermines any faith or trust we are supposed to have in this process and prevents the level of detail in submission responses due to lack of information.

Again, I realise this may not be directly relevant to the sites themselves, but how does it make for a sound local plan if those wishing to make a submission face such barriers to the consultation process? This is not the first time I have raised this as unfortunately it was the experience I and residents had when this plan first went through the consultation process in 2023. Fundamentally, this makes the consultation process meaningless, residents have been describing it as fake and false with the Council not being proactive in their engagement.

Alongside to not being able to provide accessible answers to resident's questions but there has been a total lack of consultation events. Each area has had a consultation drop-in however this cannot act as a substitute for a public meeting where residents can ask officers questions clearly and in the round. These also need to be at suitable times where residents who have work and caring commitments can also attend. None of this has happened and as a result my office and I have had to try answer questions we are not equipped to answer or attempt to get responses from the planning team which has slowed down the process considerably, especially when there is a deadline looming over the consultation that needs to be met by those wanting to submit.

As a brief aside to underline this, I have had it remarked to me that North East Derbyshire's consultation process for their local plan is really easy to navigate and use from constituents who have experienced what Sheffield Council have. It is very rare I get these sorts of comparisons on such a dry and technical issue, but it does show it is entirely possible to run a better process and this is noticed by residents.

It is bitterly disappointing, and I have written the chief executive of Sheffield City Council about it and will be writing to the Inspectorate separately about the consultation process but given the implications it has on this process it also needed to be noted in my submission.

The practical implication it is having on this submission and many others is that there are constantly new issues being found, or questions being raised. As a result, I do expect there will be more problems found with these sites between the consultation deadline and the start of the hearings in October. I would ask the Inspectorate to show flexibility as this is not the fault of residents, but how the Council have run their consultation process.

5.0 Alternative sites

I have previously urged the Council to conduct a fresh call for sites following the Inspectorate's letter in February. This would have been the fairest and most robust approach to ensuring a fairer spread of sites on the green belt. The Council decided against this citing that there was not enough time to do so. While I dispute that I do recognise we are at a point in this process where a further call for sites is not possible (albeit of the Council's own making). However, I would hope that if any developer or landowner were to approach the consultation at this stage the Inspectorate would be willing to hear their case for any sites they may wish to put forward, especially to address the imbalance that has been outlined above.

Even so, there remain a number of sites that were proposed in the initial call for sites that the Council has discounted as not suitable for development at this stage. This section establishes that these sites are viable and would help spread development on green belt across the city. This is by no means exhaustive but highlights some sites that would help ease the pressure currently being put on Sheffield South East, and particularly Handsworth.

5.1 Longlisted sites not proposed for green belt release

I have considered a number of green belt sites longlisted but not proposed for release that are as viable, if not more so, than the sites in Sheffield South East and should be looked at further to address the serious imbalance of development in the local plan.

S04106 – The Boundary Club, Jordanthorpe Parkway, S8 8BU[28]

This site exists on the boundary of the local authority and currently is derelict. It would fit the description of 'grey belt'. It has been derelict for several years and has not been used as a sports ground for over ten years.

The reason given for its rejection: "The site is ruled out due to presence of a fundamental constraint: Currently unused Outdoor Sports (Jordanthorpe Parkway Sports Ground)."[29] It is difficult to see how this reason and logic can hold given it has not been used for several years and there are no plans for this to change that we are aware of.

I also note that it is not the policy of the Council to not develop open spaces. Just this year there have been two planning applications approved that do just this in Walkley and Woodhouse.[30] It is confusing why the Council would discount a site in this site allocation yet approve planning applications in other parts of the city.

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[28] Draft Sheffield Plan Proposed Additional Site Allocations: Selection of Sites for Green Belt Release Topic Paper – May 2025 (page 171)
[29] Ibid
[30] BBC news article (https://www.bbc.co.uk/news/articles/c8x4l2r5zy9o?utm_source)

At the same time, the site is in close proximity to the existing bus network with a number of stops local to the area. Not only that it does not limit access to open green spaces being on the city boundary and near several parks including St George's Park and Graves Park.

This site seems to have been discounted out of hand for reasons that do not seem to stand up given the present context. Unless the planning team can specify when the site will be used again as an outdoor sports space then this seems like an ideal location for housing development.

S02437 – Moor View Golf Centre, Bradway Road, S17 4RH[31]

Currently this site is used as a driving range, but the owner has made previous submissions to have it rezoned for housing. The reason given for the rejection was that it is an active sports facility. It is important to recognise that access to sports facilities is important, but at the same time it needs to be highlighted when there is a surplus of facilities in the area.

In this case Abbeydale Golf Club is adjoining to this site. It is fair to argue then that this site is surplus to requirements and could be rezoned. I note there are other sites that were in the longlist that were active sports sites, but did not have similar facilities near them. Therefore, I accept the rationale that they should not be brought forward. In this case however there is a facility immediately next door to this one that can cater for the golfing needs of the area.

In addition, this site is very well connected to both the bus network and has Dore and Totley station a 25-minute walk away. It would also not have any impact on urban sprawl being surrounded by either the aforementioned golf course or existing development.

S02383 – Land to the south of Manchester Road, S10 5PS[32]

This site is an unused sports field and has been for some time. There is no indication that it will return to that use anytime soon so is current left without any function. Similar to the above example in Jordanthorpe the rejection of this site seems to come from the Council not wanting to confront Sports England (who I note are no longer statutory consultees on planning applications). I struggle to see how they would not have a robust case to make in this instance.

While there is a barrier in access to the public transport network this should not disqualify the site as other sites such as S03028 and S03100 have been included in the proposal and score the same for access to the core transport network.[33] Even then a ten-minute walk from the site would get a resident to the 51-bus route which runs every 15-36 minutes depending on operating hours.

[31] Draft Sheffield Plan Proposed Additional Site Allocations: Selection of Sites for Green Belt Release Topic Paper – May 2025 (page 139)
[32] Ibid (page 204)
[33] Ibid (page 45)

This also does not factor in the reforms to the bus service currently underway that would give greater control over where bus routes and their frequency would be to the transport authority under the South Yorkshire Mayor. This has been acknowledged in the topic paper[34] although it is only a singular reference with no mention of this fact on any of the site appraisals which I do not understand. Greater control of public buses should unlock these sorts of sites.

S03068 - Land to the south of Hathersage Road, S17 3AB[35]

Having established that proximity to the core transport network does not immediately discount a site this area is also a strong contender for development. It would help spread the development across the city and provide the homes needed for those wanting to live in those areas.

Given the other sites already proposed I also do not think the justification of preventing urban sprawl stands up here when there are sites like Handsworth Hall Farm that would effectively join Sheffield and Waverley, and other sites in the North that have a similar spread of urban areas. Finally, the peak district itself acts as a clear boundary so the idea this would be unchecked urban sprawl is just not credible as there is a clear barrier to keep it in check.

GBOM12 – Dore Moor Garden Centre and Nursery, Brickhouse Lane, S17 3DQ[36]

This site is discounted for similar reasons to the above Hathersage Road site, so my reasoning is similar. Additionally, it is a very small site and therefore not much of a to the existing development. The Peak District boundary will naturally check expansion. Use of these smaller parcels of land I would also have thought would be preferable to spread the development across multiple sites rather than focus on larger ones that cause significant disruption and mitigation work.

S03008 – Land at Totley Hall Lane, S17 4BE[37]

The reasons for rejecting this site have already been countered in my response to the above sites such as distance to core transport network etc. This site also represents a major opportunity to develop significant housing on the west side of the city where it is in greater demand and currently is underserved in the local plan.

[34] Ibid (page 7)
[35] Ibid (page 264)
[36] Ibid (page 192)
[37] Ibid (page 231)

5.2 Omission sites

During the previous consultation (and after the initial call for sites) further sites were proposed to the Council. At the time, the plan was initially presented to the Inspectorate the Council outlined why these sites were not suitable.[38] Of the 38 submitted omission sites 31 are in the green belt. At the time I understand they were discounted for that reason as the plan had made a commitment that green belt would not be built on. However, following the Inspectorate's letter in February I do not understand why these sites were not considered given that condition no longer applied.

A significant portion of these sites are very similar to the Handsworth sites insofar as they are on farmland in the green belt but are on the west of the city. I am not convinced that these sites have been explored in detail, in favour of the sites in the initial call. I will not go through each in detail but there are many on this list that would appear to be suitable to develop in an effort to ensure the green belt is not being entirely erased in certain communities while being maintained in others.

6.0 How to make the local plan more sound

The above has reflected on various concerns and issues with the current proposals made by Sheffield City Council on building on the green belt. Some I do believe can be addressed by the plan, but the sum of all these concerns undermines the soundness of the green belt release proposals, making them untenable. Core to this is the unfair distribution of sites across the city that will only increase existing inequalities.

On that basis an immediate amendment to the plan can be considering a handful of sites (some outlined above) for development to ease the burden elsewhere, particularly in Handsworth and the Beaver Hill site. The proposals made by the Council produce a total figure of 3,948[39] have already established a cushion of 421 homes over the 3,527 instructed by the Inspectorate. Any houses above and beyond the instructed amount should be taken off the Handsworth sites, specifically Beaver Hill. These could come from the above or from windfall sites over the coming years.

Further, there has been an attempt by the Labour Group on Sheffield City Council to raise an amendment to the plan that would actively seek out sites in the west of the city to try and address this imbalance of development on green belt. I would obviously support such a move, but to further protect these green belt sites could every effort be made to hold back development on these sites until others have been built on such as the brownfield sites. This would put the Council in a far better position come the five-year review of the local plan. Collectively this could go some way to easing the pressure of Handsworth and allow fairer development across the city.

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[38] Omission Sites: site selection methodology (pages 2-3)

[39] Sheffield Plan: Proposed Additional Sites Allocations May 2025 (page 12)

7.0 Summary

Sheffield must meet the housing target set nationally. I want to be clear that I am not disputing that in any way and given that I want to be clear that in my constituency we are prepared to take our fair share of housing, and potentially more if we can unlock greater transport benefits.

With that said I do believe that development on White Lane and Handsworth Hall Farm are tenable, on the basis that the right infrastructure and services are provided as set out in the golden rules such as a tram train on the Barrow Hill line. Without these improvements being made before or alongside the developments however I cannot support these sites.

The Beaver Hill site however is completely unsustainable and not sound, not only does it represent over development in this part of the city while other areas face no development at all, but there are issues specific to that site that undermines it. These are the flood risk development would cause on Beaver Hill Road, the ecological value of the northeastern parcel of land, the inability to get a practical access road into the development, and the unsatisfactory traffic mitigation on the junction of Beaver Hill Road/Retford Road. In view of all these specific problems I do not believe this site is at all sound and should not be included in the local plan.

More broadly, as my submission has shown, the current split in green belt allocations across the city is not fair. 44% of the entire green belt allocation cannot be placed on one single community while other parts of the city remain with little to no development of their green belt.

This completely undermines the soundness of the plan by placing unique pressures and demands on select communities, while also denying other areas the opportunities of housing so there is genuine choice in Sheffield for those wanting to live here. A local plan needs to be forward thinking, and this distribution does not achieve this. While a general concern and not relating to any one specific site I do believe it is key to the current problems the local plan faces and it has to be solved with a fairer distribution of sites.

I do recognise that considerable effort has been put into this plan, and there has been genuine attempts to secure a brownfield first approach. This rigor and effort appear to have ended there however, and now in the final stages the Council are allowing unsustainable and unfair development to take place in the poorer parts of the city while the wealthier parts get extraordinarily little or none at all.

Local plans are meant to be important planning documents that secure the long term and sustainable growth of areas to accommodate their housing and employment needs. As a spatial plan across the whole city, it should work to recognise the needs, but also the existing problems an area is facing and the inequalities present. This local plan does not do that when it comes to green belt release and just seems a rushed attempt to make up the housing target number. As a result, it does not provide sustainable growth for the people of Handsworth or address the needs of the local communities there which does not make for a sound plan.

Alongside representations made by local residents and the resident working group I hope the Planning Inspectorate can reflect on these submissions and recognise that the local plan as it currently stands is not sound, but with a fairer allocation of sites that are spread across the whole city we can achieve more sustainable development for the people of Sheffield and finally secure a long term planning strategy with the local plan at its core. I am hopeful in this regard as there are the sites available that meet these criteria, and possibly even more with a further call for land. I know the Inspectorate will reflect on this and I look forward to attending the hearings later this year to make this case in person.

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