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From: Tony Wallace [REDACTED]
Sent: 10 July 2025 23:36
To: SheffieldPlan
Subject: Representation to additional Green Belt sites
Attachments: CPRE PDSY Representation to additional sites in Green Belt 10.7.25.pdf

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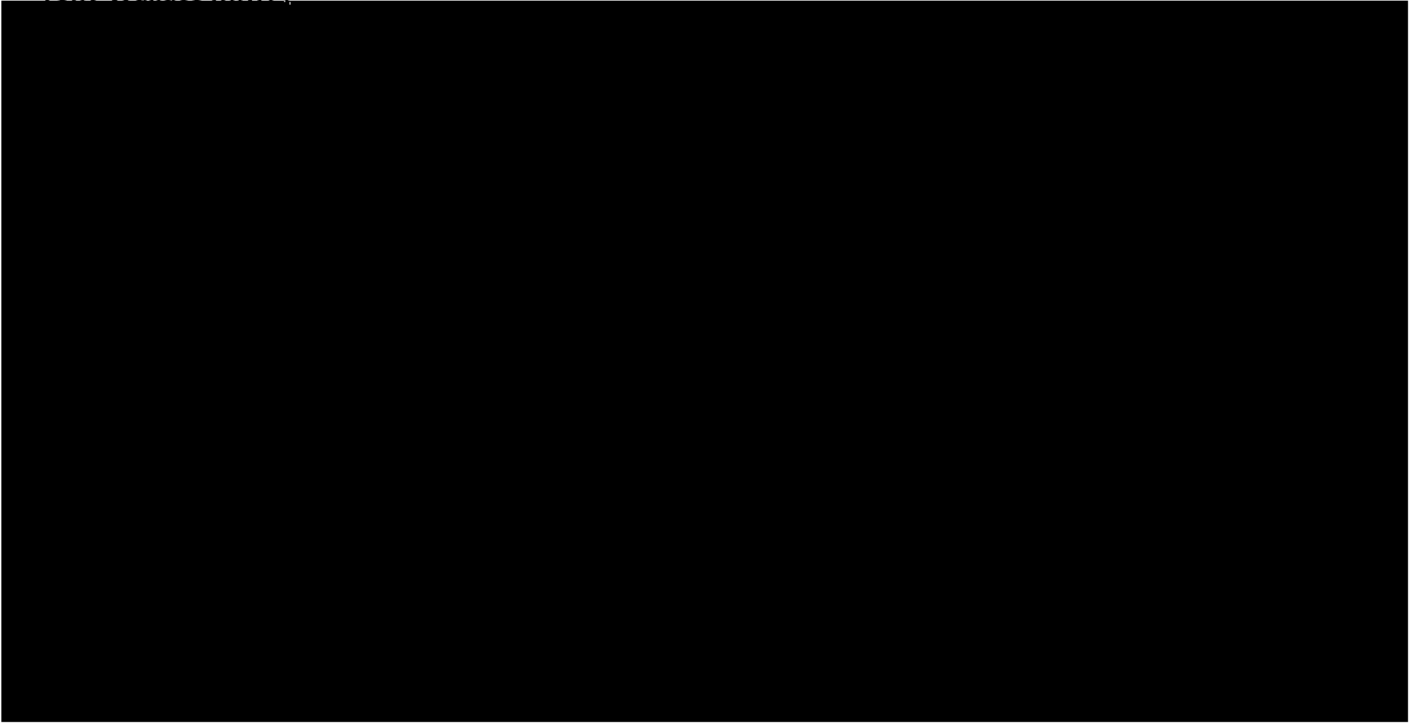
Dear SCC,

Please find attached a representation made on behalf of the CPRE Peak District and South Yorkshire in response to the additional Green Belt sites consultation.

Kind regards

Tony

Tony Wallace MRTPI





Representation to Sheffield Local Plan Examination Consultation on Proposed Additional Green Belt Sites and Green Belt Deletions

10th July 2025

Correction added 28th August 2025 – Map replacement on page 28

Prepared by Tony Wallace MRTPI on behalf of the CPRE Peak District and South Yorkshire

1 Introduction

- 1.1 The CPRE Peak District and South Yorkshire has a long history which includes campaigning for the first Green Belt in Sheffield. Green Belt became a national policy alongside the concept of new towns. New Towns are arguably the best way to secure the benefits of development whilst protecting existing Green Belt and the charity is concerned that national planning policy is still driving the expansion of existing cities at the expense of a more strategic and sustainable approach to the use of the open land that surrounds them. The absence of a well evidenced and adopted land use framework¹ or Green and Blue Infrastructure Strategy² for Sheffield is a significant weakness in planning for a more sustainable future. Arguably large parts of open Green Belt land around Sheffield is undervalued and its importance is not well understood in the current planning process.
- 1.2 As put eloquently by Professor Dieter Helm³ a Professor of Economic Policy at the University of Oxford:
- 1.3 *‘Natural capital is most valuable when it is near to people. Green infrastructure is every bit as important to economic growth as bricks, mortar and concrete if — and it is a big if — growth is properly measured. With this in mind, the Green Belt and the new Grey Belt are prime candidates to be made greener, not simply pushed aside in the name of housebuilding totals. They are in just the right places to maximise the value of natural capital to people, to provide clean air, space for recreation, and mental and physical health benefits, close by so that people can quickly immerse themselves in nature. The fact that the Green and proposed Grey Belt areas are not currently all that green is an opportunity to make them greener, not to abandon them to more urban sprawl’.*
- 1.4 The examination process and NPPF favours more land take for development with the presumption in favour of meeting housing and economic growth requirements. This approach risks adverse effects being undervalued or unrecognised in the planning balance. The CPRE PDSY therefore wish to highlight the likely adverse effects of the housing and employment land requirements and draw the attention of the examination inspectors to representations submitted by individuals and also campaign groups which provide opinions and evidence on the likely adverse impacts, and their nature and degree. Some of these adverse impacts are not captured in a meaningful way by the Sustainability Appraisal or current evidence base.

¹ The Royal Society (2023) Multifunctional Landscapes: Informing a long-term vision for managing the UK’s land

² Natural England (September 2024) Green Infrastructure Process Guide for Local Planning Authorities

³ CPRE and the Kings Foundation (September 2024): Perspectives on the Urban Edge,

- 1.5 The CPRE Peak District and South Yorkshire wish to object to a number of the proposed green belt sites on the basis that it is likely that the planning benefits of meeting the strategic housing and economic land requirement's currently accepted by the Inspectors and SCC would in fact be significantly outweighed by the cumulative material planning harms of developing the sites, a situation which would be exacerbated should deliverability or developability of the newly proposed sites not be realised, with speculative development occurring over and above the proposed sites due to the Government's NPPF delivery test and tilted balance being triggered irrespective of a new plan having been found sound and adopted.
- 1.6 The CPRE Peak District and South Yorkshire also wish to point out that the housing requirement and also the employment land requirement recommended by the Inspectors and agreed on by the Council are a fundamental modification to the plan submitted for examination with higher numbers being cited as options in previous earlier stages of plan consultation without an understanding of what the adverse effects were likely to be in any great detail. The assessment of 'significant effects' carried out for the Green Belt sites is too coarse an assessment and also misses consideration of important aims for sustainable development contained in the NPPF.

2 Soundness of the emerging Local Plan

- 2.1 The charity understands why the Inspectors and Sheffield City Council (SCC) have agreed on a strategic housing requirement based on the 2023 (Dec) NPPF's methodology, and acknowledges the risks of speculative green belt and grey belt development and also the higher 2024 NPPF requirement for homes which would arise if the current emerging plan and its new sites are not found sound. It also recognises a similar situation in respect of employment development including large scale logistics.
- 2.2 However, the housing and employment land requirements agreed in the examination would only be justified and consistent with national policy and therefore sound if paragraph 11b)ii of the NPPF (Dec) 2023 is met.
- 2.3 Paragraph 11 in the NPPF (Dec) 2023 caveats meeting the currently proposed strategic housing and employment land requirement if any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.
- 2.4 At what point the balance would weigh against the strategic housing and economic development land requirements in practice is a judgement, albeit a judgement that must be 'Wednesbury reasonable'.

- 2.5 The proposed sites are a direct result of the strategic housing and employment land requirements and the material planning harms of the proposed sites flowing from these requirements fall under the following themes (with sites looked at in more detail within Appendix A):

3 Green Belt

3.1 Merging of towns

- 3.2 The charity is of the opinion that Chapeltown (a town with a population of around 22,180⁴) remains physically, visually and in identity and character, separate to the large built up area of Sheffield City, despite employment development near Smithy Woods coming close to bridging the gap. The development of Land to the east of Chapeltown Road (Housing) - Site Ref: CH05 would physically, visually and in character, merge Sheffield with Chapeltown. The effect would arguably be significant on purpose B of Green Belt and alone enough to undermine the purposes of Green Belt across the plan area when taken as a whole. The proposed deletion from green Belt of land to the north of the proposed allocation reflects the wider adverse effect of the proposal on the purposes of Green Belt taken as a whole and also weakens protection of this river corridor of open land and habitat which includes a Local Wildlife Site along Blackburn Brook.

3.3 Sprawl

- 3.4 The charity is of the opinion that the Land between Lodge Moor Road and Redmires Conduit (Housing) - SCC Site Ref: SWS18 would represent sprawl of the large built up area of Sheffield City, with the site likely to significantly weaken how well the land to its south serves purpose A of Green Belt, having an adverse effect on the purpose of Green Belt well beyond the proposed deletion and allocation.
- 3.5 The charity is of the opinion that the Land at Forge Lane (Housing) - SCC Ref NWS30 would represent sprawl of the large built up area of Sheffield City, with the site likely to significantly weaken how well the land to its east serves purpose A of Green Belt, having an adverse effect on the purpose of Green Belt well beyond the proposed deletion and allocation. The eastern boundary of the site is a private road which is not surfaced and sealed and arguably is a 'soft boundary' applying the guidance set out in table 1 of the SCC Green Belt Review 2020.

⁴ England and Wales Census 2021, Towns and cities, characteristics of built-up areas

- 3.6** The charity is of the opinion that the Land to the north of Parkers Lane (Housing) - SCC Site Ref: SWS19 would represent sprawl of the large built up area of Sheffield City, with the site likely to significantly weaken how well the land to its north, west and east serves purpose A of Green Belt having an adverse effect on the purpose of Green Belt well beyond the proposed deletion and allocation. The northern and eastern field boundaries of the site are arguably 'soft' boundaries applying the guidance set out in table 1 of the SCC Green Belt Review 2020.

3.7 Exceptional circumstances

- 3.8** The charity asks that the LPA and Inspectors pay close regard to the submissions made by others setting out arguments for why sites within the built-up area including on previously developed land are deliverable, not as omission sites but as evidence of whether or not exceptional circumstances exist in light of paragraph 146 (a) of the NPPF.

4 Natural Environment and Nature Recovery

- 4.1** The charity is of the opinion that the proposed new Green Belt sites cumulatively would harm the intrinsic character and beauty of the countryside⁵ around Sheffield and that their selection does not adequately factor in the sites potential importance to nature recovery and establishing coherent ecological networks that are more resilient to current and future pressures⁶. There is a real risk that the plan will not adequately identify, map and in particular safeguard components of local wildlife-rich habitats and wider ecological networks as required by paragraph 185(a) of the 2023 NPPF.
- 4.2** Furthermore, [Section 40 of the Natural Environment and Rural Communities Act 2006](#) as amended by The Environment Act 2021, places a statutory duty on Sheffield City Council to not just conserve but also to enhance biodiversity. However, in the absence of an adopted Local Nature Recovery Strategy there is a risk that the proposed greenfield sites would adversely affect the delivery of an LNRS by removing land with the potential to be of strategic importance.
- 4.3** There appears to be an evidence gap and also a limitation in the site assessment and selection process in terms of the consideration of nature recovery which could limit the ability of the LPA to meet paragraphs 180 and 185 of the 2023 (Dec) NPPF and limit the Inspectors knowledge of adverse impacts, the process relying on an inadequate approach to constraints and impacts.
- 4.4** Before opting to develop greenfield sites outside the built-up area the charity would expect an approach to site assessment and selection to have regard to the following:

⁵ NPPF (Dec) 2023 Paragraph 180 (b)

- Priority habitats (Habitats and species of principal importance in England) as mapped locally or in the Natural England [Priority Habitat Inventory](#)
- Evidence on the relative strategic importance of areas for nature recovery, including as a minimum Natural England's [National Habitat Network Maps](#)
- If available, evidence from the Sheffield and Rotherham Wildlife Trust on nature recovery network opportunities mapping.

⁶ NPPF (Dec) 2023 Paragraph 180 (d)

- 4.5 The Land Availability Assessment and the [site assessment and selection approach](#) do not factor in nature recovery in a meaningful manner. Local Wildlife Sites are within or adjoining some of the proposed allocations and as a result many of the proposed sites are within Natural England's habitat network expansions zones. Whilst the habitat network zones are not an LNRS and do not show the potential for naturally occurring ecosystems across landscapes, they do serve to illustrate possible areas for future action to enhance biodiversity. The habitat network maps were hoped to stimulate local engagement with partners and help the agreement of local priorities with the identification of where action might help build more ecologically resilient ecosystems across landscapes. They are relevant to positive planning for the city.
- 4.6 The Natural England habitat network map is arguably striking to look at when at a 1:50,000 scale, as it shows that some of the sites sit in locations which could make the existing ecological network bigger better and more connected should their biodiversity and extent be enhanced. All in locations close to people, with the potential for not just ecological benefits but also benefits to health and wellbeing. It also illustrates how the proposals risk development not only removing future potential for nature recovery but have the potential to harm the existing core habitat network by placing development too close to sites of biodiversity and network value.
- 4.7 There is a swathe of open land running from the Upper Don Valley towards Grenoside and beyond separating Chapeltown from the built-up area of Sheffield.
- 4.8 A swathe of open land running from near Thurgoland to between Tankersley and Chapeltown, and to a large degree running open between the M1 and the built-up area of Sheffield until Grange Lane.
- 4.9 A vegetated corridor running along the A57 from the Parkway to Shirecliffe Wood.

- 4.10 When looking at the sites biodiversity mitigation in the consultation documents 'conditions on development' it appears that these do not factor in more than the minimum default buffer distances to Local Wildlife Site habitats (as is likely to be commented on in detail by the Sheffield and Rotherham Wildlife Trust). Furthermore the iterations of the Sustainability Assessment (Integrated Impact Assessment) including the update and addendum dated April 2024 does not adequately consider the individual and cumulative effects of the loss of the sites on achieving a local nature recovery network which is coherent, resilient and supports protected and priority species and habitats. The SA Framework objective 12 (Ecological and geological assets created, conserved, managed and enhanced) downplays the potential effects of strategic 'option B' and appears to fail to recognise the reality that without receptor sites within Sheffield, biodiversity net gain is likely to occur off-site and elsewhere in England. It also appears to fail to recognise the potential of Green Belt land immediately adjoining the built-up area of the city to be enhanced to provide new suitable accessible natural greenspace. It also appears to fail to be cognisant of the mitigation identified as appropriate in the Habitats Regulations Assessment.
- 4.11 Better information is needed to allow the Inspectors and Council to make an informed judgement and assess likely adverse effects with regard to paragraph's 180 (a), (b) and (d) and 185 (a) and (b) of the 2023 (Dec) NPPF.
- 4.12 The following sites are objected to as they have the potential for adverse effects in the form of hindering nature recovery and also affecting the nearby Local Wildlife Sites (where present), if adequate buffer areas are not provided (the representation from the Sheffield and Rotherham Wildlife Trust should be considered in this respect). More detailed commentary is provided on the sites in the appendices.
- Land at Forge Lane (Housing) - SCC Ref NWS30
 - Land between Storth Lane and School Lane (Housing) - SCC Ref: NWS31
 - "Land to the south of the M1 Motorway Junction 35 (Employment) - SCC Site Ref: NES36"
 - Land between Creswick Avenue and Yew Lane (Housing) - SCC Site Ref: NES37
 - Holme Lane Farm and land to the west of Grenoside Grange, Fox Hill Road (Housing) - SCC Site Ref: NES38
 - Land at Wheel Lane and Middleton Lane (Housing) - SCC Site Ref: NES39
 - Handsworth Hall Farm, Land at Finchwell Road (Housing and Employment) - SCC Site Ref: SES29
 - Land between Bramley Lane and Beaver Hill Road (Housing) - SCC Site Ref: SES30

- "Land between Lodge Moor Road and Redmires Conduit (Housing) - SCC Site Ref: SWS18"
- Land to the north of Parkers Lane (Housing) - SCC Site Ref: SWS19
- Hesley Wood, north of Cowley Hill (Employment) - SCC Site Ref: CH04

4.13 The plan risks failing to assist in establishing coherent ecological networks that are more resilient to current and future pressures and so not planning for this positively.

5 Landscape character, countryside character and green infrastructure

- 5.1 The site selection methodology⁷ states that sites could be ruled out where the landscape had no or very low capacity for absorbing development. This leaves open to consideration sites where the capacity for development is medium to high. However, the [Landscape Character and Green Belt Capacity Assessment by SCC](#)⁸ also states that *It is believed that some new development could be accommodated within the Green Belt without compromising the overall quality and character of the landscape or the sense of separation between the existing settlements.*
- 5.2 Where the assessment has identified land parcels within the Sheffield Green Belt, categorised Band A, with severe constraints to development potential based on landscape sensitivity, it is recommended that these sites be removed from consideration. There are, however, a few land parcels categorised Band A, which include a development opportunity on part of the area.
- 5.3 A number of the proposed sites were categorised as having a low capacity for development whilst others a medium. Of the medium sites the tranquility scores do not fully reflect the sense of tranquility and connection with nature experienced in these locations and the resulting benefits to peoples physical and mental health. The benefits of natural/semi-natural greenspace are well described in the evidence submitted by Dr Julian Julian Dobson, senior research fellow, Centre for Regional Economic and Social Research, Sheffield Hallam University to the House of Commons Environment, Food and Rural Affairs Committee, October 2023.
- 5.4 The landscape character capacity assessments and other evidences does not fully capture the intrinsic beauty of the countryside affected by the proposals and the wider benefits from the sites natural capital and ecosystem services.

⁷ SCC [Site Selection Methodology January 2023](#) Paragraph 3.25 to 3.35

⁸ Landscape Character and Green Belt Capacity Assessment SCC April 2018

- 5.5 It is clear from campaigns against the proposals that people greatly value the sites for their wildlife, their intrinsic character and their health and well being benefits. The scores on the Sheffield and Rotherham Wildlife Trusts [Nature Equity Map](#) and the [Tree Equity Score UK](#) provide a degree of analysis of likely adverse effects on health and wellbeing from losing some of the sites where public footpaths provide access for walking and/or cycling or horse riding and serve areas of relatively high income and health deprivation
- 5.6 Another element of concern is the use of Urban Green Zone (UGZ) policy designations to be applied to areas of land deleted from Green Belt. The use of UGZ's policy appears to be weaker than that of Local Green Space (LGS) Designation which is afforded significant weight in the NPPF. Whilst not all land will fit within the criteria set out in the NPPF (Dec) 2023 paragraph 106 there appears to be no evidence showing an assessment of where such sites might exist and as so there is potential for some of the proposed allocations to be on land which fits with the criteria set out in the NPPF for LGS.
- 5.7 The sites of most concern and which are objected to are set out below with a more detailed commentary provided for each site in the appendices:
- Holme Lane Farm and land to the west of Grenoside Grange, Fox Hill Road (Housing) - SCC Site Ref: NES38
 - Land at Wheel Lane and Middleton Lane (Housing) - SCC Site Ref: NES39
 - Handsworth Hall Farm, Land at Finchwell Road (Housing and Employment) - SCC Site Ref: SES29
 - Land between Storth Lane and School Lane (Housing) - SCC Ref: NWS31
 - Land between Creswick Avenue and Yew Lane (Housing) - SCC Site Ref: NES37
 - Land between Bramley Lane and Beaver Hill Road (Housing) - SCC Site Ref: SES30
 - Hesley Wood, north of Cowley Hill (Employment) - SCC Site Ref: CH04

6 Best and most versatile agricultural land

- 6.1 The Land Availability Assessment, site selection process and sustainability appraisal do not rely on adequate information on [land classification](#). The Sustainability Appraisal categorises sites with provisionally Grade 3 land as having a neutral impact, with downplays potential adverse effects. Several of the sites contain land which is provisionally categorised as Grade 3 but do not benefit from adequate soil surveys carried out by a [competent specialist](#). Several of the sites also appear to be in current agricultural uses.
- 6.2 Better information is needed to allow the Inspectors and Council to make an informed judgement and assess any adverse effects of losing the best and most versatile agricultural land and also of losing land which is currently used for farming and food production with regard to paragraph 180 (a) of the NPPF and footnote 62 which states that; *Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development*’.
- 6.3 The plan should not see allocations where the question of land classification is unanswered, either by accepting that the land should be treated as best and most versatile if provisionally grade 3 unless proven otherwise or by providing the necessary detailed survey and assessment work. The level of evidence present does not appear to be proportionate.
- 6.4 The charity is also concerned at the effects of uncertainty over the emerging plans site allocations as it has the potential to severely disrupt the lives of tenant farmers.

7 Green infrastructure and green belt enhancement

- 7.1 The NPPF requires positive planning for enhancing natural capital at a catchment or landscape scale.
- 7.2 In doing so it also requires⁹ plans to promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. In respect of Green Belt the NPPF¹⁰ also requires the Council to plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

⁹ NPPF (Dec) 2023 Paragraph 180 (a) and (b)

- 7.3 The charity is of the opinion that the plan does not appear to plan positively enough to achieve the aims of the NPPF in respect of Green Infrastructure and enhancing the Green Belt. A strategy for the enhancement of Green Infrastructure and Green Belt is needed which in the continued absence of a LNRS should factor in a strategy for nature recovery, also factoring in the aspirations of the Council in respect of health and well-being, climate change resilience and adaptation and economic growth. Such a strategy should be part of the mitigation necessary to avoid likely significant effects on the South Pennine Moors Special Area of Conservation and the Peak District Moors Special Protection, and a means to co-ordinate the delivery of new accessible natural greenspace and developer contributions in a strategic way at a landscape scale.
- 7.4 The charity believes that the Sheffield Council should commit in the examination to preparing a Green Infrastructure Strategy that also serves as a land use framework for land within the Green Belt and also commit to preparing an action plan to deliver strategic objectives, considering its own land holdings in the process. The mitigation deemed necessary in the emerging Local Plans Habitats Assessment Appropriate Assessment should be actioned within the Local Plan's policies with regard to requiring developer contributions and also the provision of new accessible natural greenspace.
- 7.5 The current emerging plan and the designation of areas within the proposed allocations as UGZ with enhancements to be determined would not achieve the necessary scale of new accessible natural greenspaces to compensate for the loss of countryside nor mitigate adverse effects on the habitat sites in the Peak District National Park.
- 7.6 It seems appropriate that the communities affected by the loss of countryside (should it happen) should see positive planning in the form of new natural accessible greenspace with investment in access and biodiversity improvements to existing countryside including the Peak District National Park (including by public transport) to which they can visit conveniently. It is also the case that three of the proposed allocations appear to have the potential to meet numerous planning aims and objectives if delivered wholly as accessible natural greenspace:
- (Land between Creswick Avenue and Yew Lane (Housing) - SCC Site Ref: NES37
 - Handsworth Hall Farm, Land at Finchwell Road (Housing and Employment) - SCC Site Ref: SES29
 - Land between Bramley Lane and Beaver Hill Road (Housing) - SCC Site Ref: SES30).

¹⁰ NPPF (Dec) 2023 Paragraphs 147 and 150

8 Sustainable locations

- 8.1 The NPPF¹¹ requires that when releasing land from the Green Belt, 'plans should give first consideration to land which has been previously-developed and/or is well-served by public transport'.
- 8.2 The NPPF¹² is also clear that significant urban extensions should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Also, that such developments are well located and designed and supported by the necessary infrastructure. It envisages that in this way identified needs can be met in a sustainable way. However, there is considerable latitude in how Local Planning Authorities and Inspectors measure sustainability, including in respect of accessibility to key services and open space via modes of alternative transport to private motor vehicles. As part of considering accessibility the charity think that an important measure of sustainability includes development being within walking distance of a range of key services and a range of types of public open spaces. Also important to measure is the capacity of those services and open spaces to serve the population in the locality, and at wider scales.
- 8.3 The charity would expect the proposed locations to be within walking distance¹³ of a high frequency bus service/tram service which allows residents to access employment areas, centres, secondary schools, further education and hospitals and also within walking distance of the following services:

¹¹ NPPF (Dec) 2023 Paragraph 147

¹² NPPF (Dec) 2023 Paragraph 109 and paragraph 74

¹³ Judged by the charity to be 800m for most people and 1200m as an upper threshold, having regard to: CIHT Guidelines for Providing for Journeys on Foot (2000) Table 3.2; National Design Guidance (page 20); CIHT Planning for Walking (2015); National Travel Survey Statistical Release 2023; Walkable Neighbourhoods Sustrans 2022; Walking and Cycling Index Sustrans 2023

- Primary Schools
- GP's
- Local convenience stores or supermarkets
- Play areas
- Amenity greenspace and natural/semi-natural greenspace

8.4 Where this is not the case, the charity would expect for the plan proposals to demonstrate how it can be achieved including through new or enhanced infrastructure with the necessary quantity and capacity increases in green and social infrastructure. Housing should not be built without the necessary services and facilities and green infrastructure coming online in accessible locations in a timely way to meet increased demand.

8.5 However, the plan currently would rely on proposed new railway stations, a new rail route and improved bus services with no guarantees on funding to provide and improve services to the new proposed allocations, including a Stocksbridge line, a circular line and the Barrow Hill to Handsworth proposal. Other proposed sites are more reliant on bus services than tram or rail services and not all the sites are close to the core network where the frequency of services is higher.

8.6 It is not clear what if any, of the mitigation measures set out in the evidence base¹⁴ will be delivered in conjunction with the newly proposed sites. There is also a lack of clarity on how residents affected by a loss of countryside near them will be given better accessibility (be that through active travel or public transport) to get to countryside to meet their needs.

8.7 The following sites are of concern and objected to, as currently they are arguably not 'well located' or 'sustainably located', in respect of existing services and facilities and public transport:

- Land at Wheel Lane and Middleton Lane (Housing) - SCC Site Ref: NES39 and associated Green Belt deletion.
- Land between Creswick Avenue and Yew Lane (Housing) - SCC Site Ref: NES37
- Land between Storth Lane and School Lane (Housing) - SCC Ref: NWS31
- Land at Forge Lane (Housing) - SCC Ref NWS30
- Hesley Wood, north of Cowley Hill (Employment) - SCC Site Ref: CH04

¹⁴ SCC Transport Assessment: Report on Potential Public Transport and Active Travel Modal Share, SYSTRA (November 2023) Table 1. Summary of Proposed Interventions by Type

- Handsworth Hall Farm, Land at Finchwell Road (Housing and Employment) - SCC Site Ref: SES29
- Land to the north of Parkers Lane (Housing) - SCC Site Ref: SWS19
- Land between Lodge Moor Road and Redmires Conduit (Housing) - SCC Site Ref: SWS18NB

8.8 On a general note it is concerning that the Infrastructure Delivery Plan and other supporting evidence do not deal with in detail what social and physical infrastructure will be necessary e.g. GP's and School Places and the charity asks that the Council and Inspectors assess in more detail each sites impacts with the preparation of a health impact assessment and also an educational provision assessment for each residential allocation in order to inform decision making at this stage of the plan process.

8.9 The charity has been made aware of evidence submitted by concerned residents as a 'S35 Community Response' which indicates inadequate healthcare provision, uncertainty over educational infrastructure requirements and also inadequate local highway infrastructure to avoid significant adverse effects. The inspectors attention is draw to this evidence and to the need for the plan to ensure that adequate infrastructure is provided, also that paragraph 110 of the NPPF requires that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

9 Efficient use of land

- 9.1 The NPPF requires that planning policies should support development that makes an efficient use of land and the charity supports the use of master plans to achieve this for allocation sites. However, the constraints on the allocation sites appear to be devoid of detailed assessment and it would be better to address this now and not at a later stage. The sites are arguably not all well located and the capacities suggested by the LPA are to be treated with caution. It is notable that broadly speaking the majority of sites densities appear between 30-35dph and the charity asks that the LPA sets out in its allocation policies what minimum density is to be expected on the sites in order to ensure an efficient use of the land (which is not necessarily the same as high density development) to appropriately balances impacts with benefits.

10 Conclusions

- 10.1 The charity understands the situation the Council is in but does not accept that the harm which is likely to result will be outweighed by the benefits of planning for (and not necessarily achieving delivery of), the proposed strategic option.
- 10.2 The charity acknowledges the evidence for a wider housing mix and the national policy drive for more homes but is also concerned that the proposed level of development may not be deliverable in practice against capacity in the construction industry.
- 10.3 There is a risk of under delivery making the plan out of date within a few years should it be adopted with a reliance on private developers, all in a context where there is limited funding to bring forward brownfield sites and sites within the built up area faster, and an undervaluing of the benefits of countryside within Green Belt.
- 10.4 To compound the situation there appears to be an absence within the plan and the Council strategy to plan positively in a strategic and co-ordinated way for nature recovery and for enhancing the beneficial use of the Green Belt, with the proposed sites development potentially harming subsequent efforts to achieve the nature protection and recovery aims of the NPPF. Furthermore, there is a loss of countryside as green infrastructure without details of adequate mitigation or compensation in the form of equally attractive accessible natural or semi-natural greenspace which serve an equivalent or enhanced natural capital function.
- 10.5 Whilst no LNRS and Green Infrastructure Strategy/Land Use Framework is in place other available evidence should be used to plan for nature recovery and sustainable land use and also to assess the effects of the proposed option and sites on meeting the aims of the NPPF in respect of Nature Recovery, enhancing Green Infrastructure and the beneficial use of Green Belt.

- 10.6 The piecemeal addressing of strategic nature recovery and green infrastructure aims and development impacts through individual master plans and planning applications as suggested in the text used within the proposed site allocations policies; *‘Planning applications must include a comprehensive assessment of the development’s impacts on the environment. Where appropriate, adverse impacts should be offset through compensatory improvements to the environmental quality and accessibility of remaining areas of Green Belt’*. Is not supported in so much as it lacks a strategic approach.
- 10.7 Adverse effects are likely to arise as a consequence of the national policy approach to housing delivery, which heavily relies on private developers, and a national context of limited funding to bring forward all brownfield sites and sites within the built up area faster, whilst also undervaluing the benefits of countryside within Green Belt.
- 10.8 The land which Sheffield’s Green Belt protects is the green backcloth to the lives of the city’s residents and is valuable for many more reasons than just the strategic purposes of Green Belt. It covers greenspaces which please the eye of those living in the city, and the mind and body when walking from streets into paths through woodland, fields and moorland. It has within it an ecological network and serves as home to the wildlife which lives within the city boundaries. It provides space for agriculture, sport, leisure, recreation, flood management and reconnection with nature. The charity believes the characteristics valued by local communities should be enhanced allowing people the opportunity to experience its benefits without needing to travel further afield.
- 10.9 The process by which areas and sites have been assessed appears to have not fully accounted for adverse effects on all these characteristics which are highly valued by those living and working in Sheffield and its towns, and to have focussed on a judgement as to how strongly sites meet the purposes of Green Belt, but with limited consideration of the impacts on the experience of tranquility and the health and well-being benefits to people afforded by the land and other adverse effects. Not all communities have close access to the National Park and the current proposals would remove and degrade for some, what countryside remains easily within their reach.
- 10.10 The Charity believe that a Green Infrastructure Strategy or a Land Use Framework is needed and one built on community engagement, a strategy that is consistent with the Outdoor City brand and nature recovery aims, setting out how the enhancement of the countryside around Sheffield and access to it can happen in a way that meets sustainable development objectives. It would also provide the opportunity should the proposed Green Belt losses happen, for a positive plan to compensate those communities where the loss of countryside and pressure on existing services and facilities will be felt most keenly.

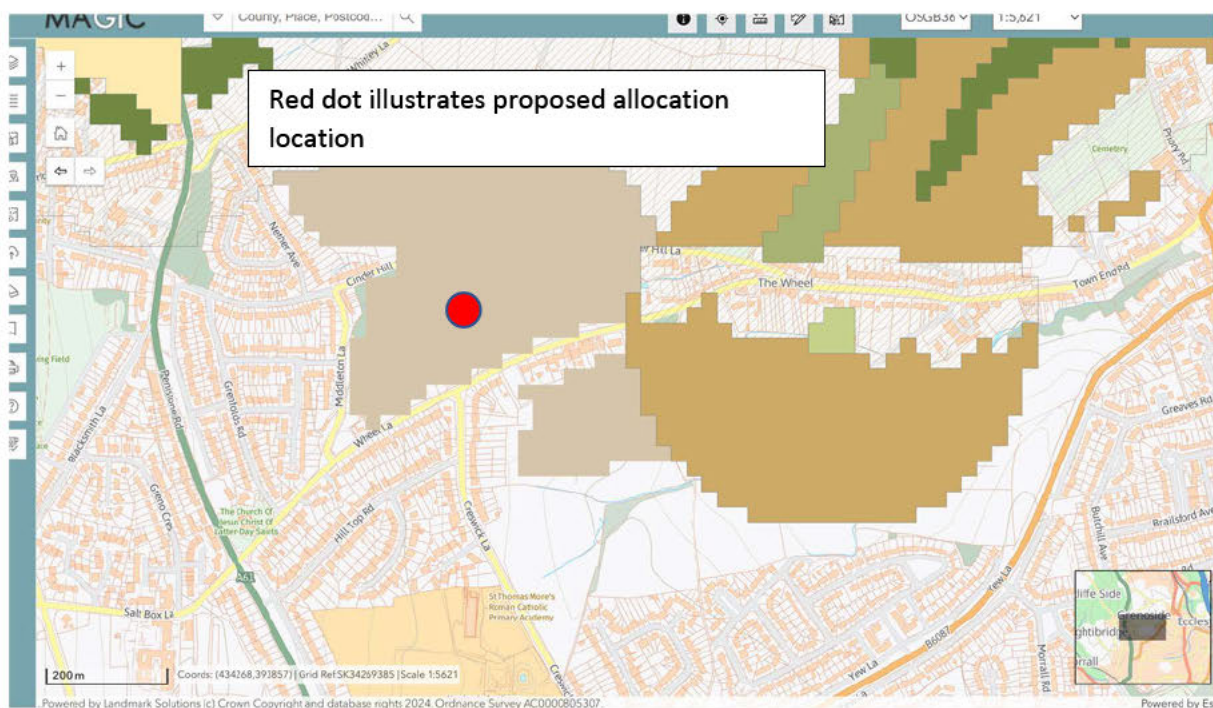
Appendix A: Site Assessments at Ecclesfield and Grenoside

Land at Wheel Lane and Middleton Lane (Housing) - SCC Site Ref: NES39 and associated Green Belt deletion.

Green Belt Impact: The development site and deletion of land if leading to development, would effectively merge Sheffield's large built up area with the village of Grenoside in visual and spatial terms. Whilst acknowledging that Grenoside is not a town and so purpose (b) of Green Belt would not be harmed, this merging would encroach harmfully on land that appears as open countryside and would detract from the villages character and open setting. It would appear as sprawl harming purpose (a) of the Green Belt. Cinder Hill Road whilst a 'permanent feature' appears simply as a rural lane within wider countryside.

Wildlife Designations: Site adjoins an area of priority habitat (deciduous woodland)¹⁵ and the Cinder Hill Brook Local Wildlife Area. The deletion would include the Local Wildlife Site and priority habitat.

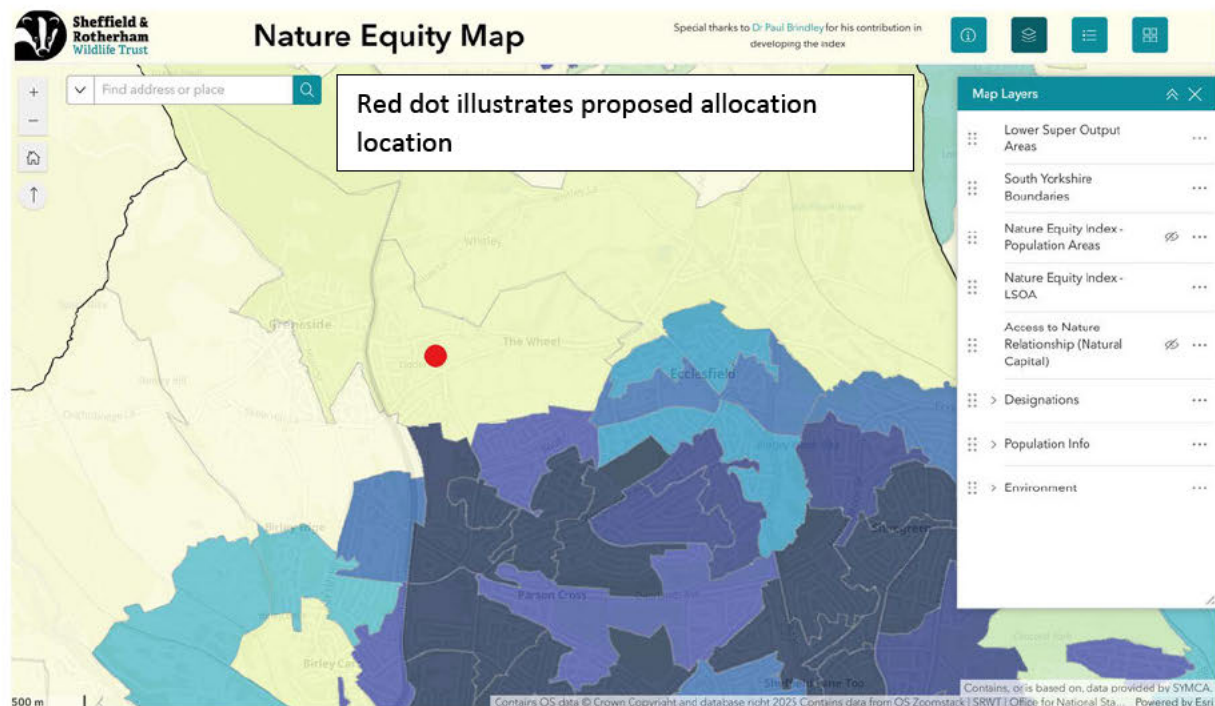
Nature Recovery: The site has significant coverage by a Network Expansion Zone¹⁶



¹⁵ Natural England Priority Habitat Inventory

¹⁶ [National Habitat Network Maps – User Guidance v.2 Natural England](#) and [MAGICMAP DEFRA](#)

Green Infrastructure and Public Rights of Way: The site appears to be provisionally identified as Grade 3 on the [agricultural land classification map for Yorkshire and the Humber \(ALC003\)](#). A public right of way (footpath) runs through the site and provides an alternative to walking along Cinder Hill Lane or Wheel Lane when wishing to walk from the south and south west towards the network of footpaths which link to Whitley and beyond. The Sheffield and Rotherham Wildlife Trusts [Nature Equity Map](#) illustrates that the site is close to a significant number of people whom can be described as having low nature equity, factoring in: access to natural greenspace, environmental inequality, health inequality and income inequality using the [English Indices of Deprivation](#).



Landscape Character and Green Belt Capacity Assessment Score: The site is identified as having a low capacity to accommodate change in respect of landscape character in the Sheffield Landscape Character and Green Belt Capacity Study. The study underplays the degree of tranquility which is likely to be experienced by people (a score of 1 in the assessment form on page 99 of the Study), yet this it is doubtful that mitigation would be effective in terms of local views and experience of the space as countryside, with its intrinsic beauty as open countryside likely to be lost through suburbanisation as opposed to being enhanced.

Accessibility to Services and Facilities:

The majority of the site will be over a ten minute/800m walk from a GP Surgery, a play ground and a local convenience store. There are bus stops within 800m of the site but the bus services provided are not high frequency with the [No.765](#) service and [No.M92](#) services being very limited in frequency. The site would arguably not be 'well located' currently in relation to services and facilities nor public transport, and the evidence submitted by SCC does not currently demonstrate that adequate provision could be secured to come online with the development.

Suggested policy criteria should the site be allocated

The allocation policy should specifically list what accessibility, service and infrastructure improvements will be required to make the site sustainable and well located with regard to Table 1 in the SYSTRA Sheffield Local Plan Transport Assessment: Intermin Report on Public Transport and Active Travel Impacts and Potential Mitigation (page 11) and this should not be left to a later 'master plan' process.

A landscaping framework should be set out now and the key aims of it should be set out in the allocation policy and this should not be left to a later 'master plan' process. This is necessary in order to ascertain how much mitigation can be achieved or not and the associated implications for impact and capacity.

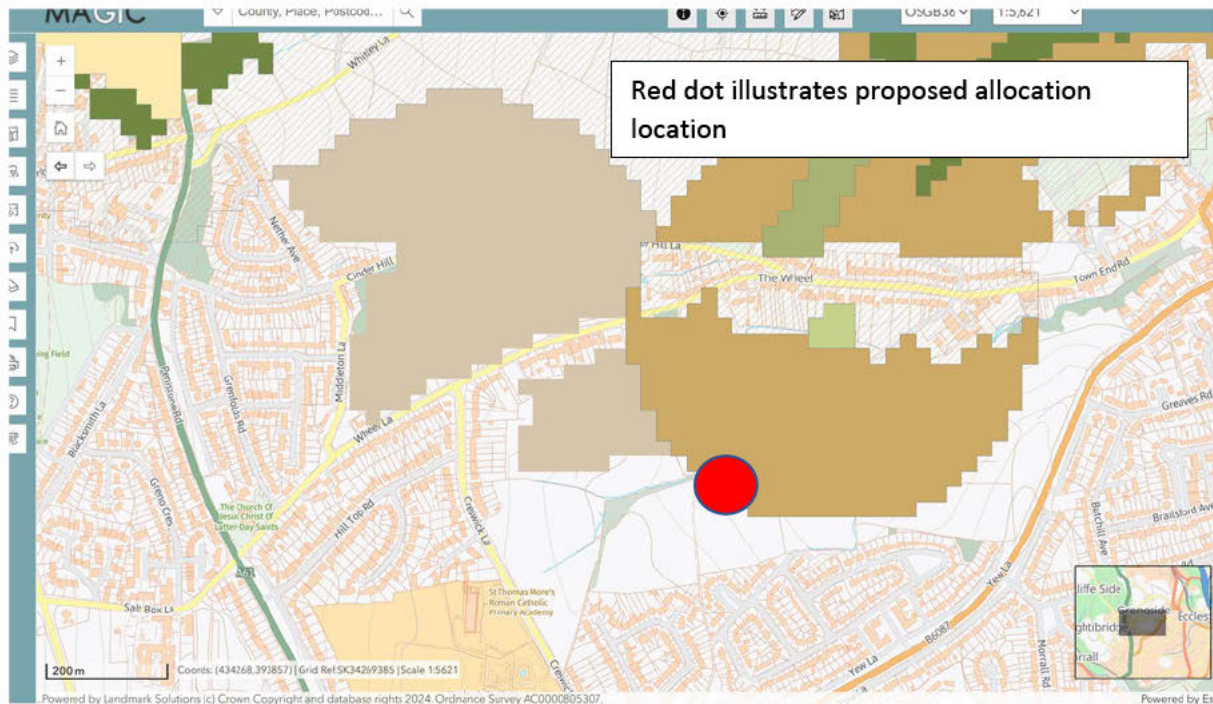
Highway infrastructure improvements should be detailed in the allocation policy based on an understanding of the likely impacts of the development of the site. This will allow the impact of the development to be adequately understood, alongside its deliverability or developability.

Land between Creswick Avenue and Yew Lane (Housing) - SCC Site Ref:NES37

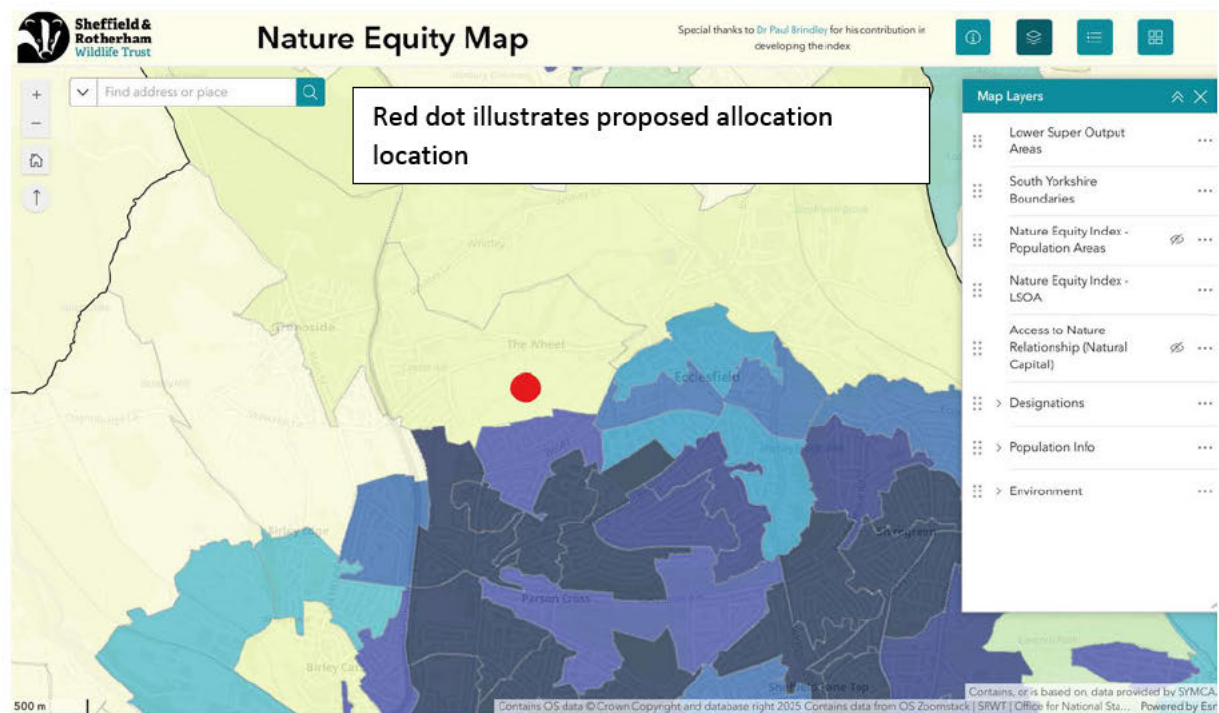
Green Belt impact: The development site and the deletion of land if leading to development, would effectively merge Sheffield's large built up area with the village of Grenoside in visual and spatial terms. Whilst acknowledging that Grenoside is not a town and so purpose (b) of Green Belt would not be harmed, this merging would encroach harmfully on land that appears as open countryside and would detract from the villages character and open setting. It would appear as sprawl harming purpose (a) of the Green Belt. The ribbon development along Wheel Lane and The Wheel is not so substantial as to make the land feel urbanised and there is a risk that major development would dominate the setting its own character for the area by removing a distinct area of countryside.

Wildlife Designation: The site adjoins the Yew Lane Local Wildlife Site (LWS) and also wraps around a limb of this LWS which is a corridor running through the middle of the site. The SRWT and others should evidence the species recorded as present such as owls, bats red deer, fox and others and highlighting the allocations likely adverse effect on species and habitats without a buffer which is tailored to the situation as opposed to a standard 10metres.

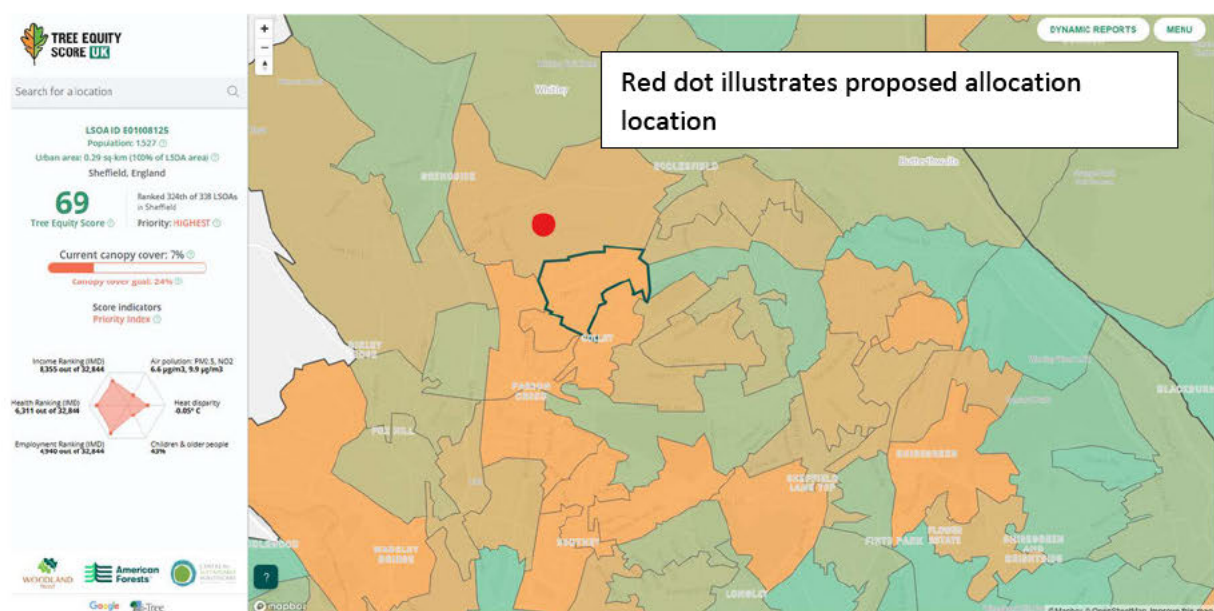
Nature Recovery: The site has significant areas covered by a Network Enhancement Zone and a Network Enhancement Zone 1. The site also has mapped in its eastern side good quality semi-improved grassland.



Green Infrastructure and Public Rights of Way: The site appears to be provisionally identified as Grade 3 on the [agricultural land classification map for Yorkshire and the Humber \(ALC003\)](#). A number of footpaths run through the site, with a small section to the east but also four paths lead to a convergence in the centre of the site. These provide walks through what has the appearance of pleasant open countryside within easy reach of residents. It does not feel urbanised. The Sheffield and Rotherham Wildlife Trusts Nature Equity Map illustrates that the site is close to a significant number of people whom can be described as having low nature equity, factoring in: access to natural greenspace, environmental inequality, health inequality and income inequality using the English Indices of Deprivation. The site currently drains into a stream and beyond and should be considered for natural flood management measures.



The [Tree Equity Score UK](#) map based on the [Tree Equity Score UK methodology](#) also shows that the site is near to areas where people are on low incomes and have less benefit from the presence of tree canopy coverage.



Landscape Character and Green Belt Capacity Score:

The site is identified as having a low capacity to accommodate change in respect of landscape character in the Sheffield Landscape Character and Green Belt Capacity Study. The study claims that there is high scope to mitigate the effect of the development (a score of 1 in the assessment form on page 99 of the Study), yet this it is doubtful that mitigation would be effective in terms of local views and experience of the space as countryside, with its intrinsic beauty as open countryside likely to be lost through suburbanisation as opposed to being enhanced.

Accessibility to Services and Facilities and Public Transport:

The majority of the site will be over a ten minute/800m walk from a GP Surgery, a playground and a local convenience store. There are bus stops within 800m of the site but the bus services provided are not high frequency with the [No.765](#) service and [No.M92](#) services being very limited in frequency. The site would arguably not be 'well located' currently in relation to services and facilities nor public transport, and the evidence submitted by SCC does not currently demonstrate that adequate provision could be secured to come online with the development. There is also little in the way of evidence to support the view that necessary new schools will be delivered, safeguarding of land from other developments in itself would only give a limited confidence of delivery.

Suggested policy criteria should the site be allocated (without prejudice to the charities view that the site has adverse effects):

The allocation policy should specify what accessibility, service and infrastructure improvements will be required to make the site sustainable and well located with regard to Table 1 in the SYSTRA Sheffield Local Plan Transport Assessment: Interim Report on Public Transport and Active Travel Impacts and Potential Mitigation (page 11) and this should not be left to a later 'master plan' process.

SCC should heed the advice of the SRWT and seek to understand in detail adequate buffers to the habitat present and if these are achievable and this should not be left to a later 'master plan' process.

A landscaping framework should be set out now and the key aims of it should be set out in the allocation policy and this should not be left to a later 'master plan' process. This is necessary in order to ascertain how much mitigation can be achieved or not and the associated implications for impact and capacity.

Highway infrastructure improvements should be detailed in the allocation policy based on an understanding of the likely impacts of the development of the site. This will allow the impact of the development to be adequately understood, alongside its deliverability or developability.

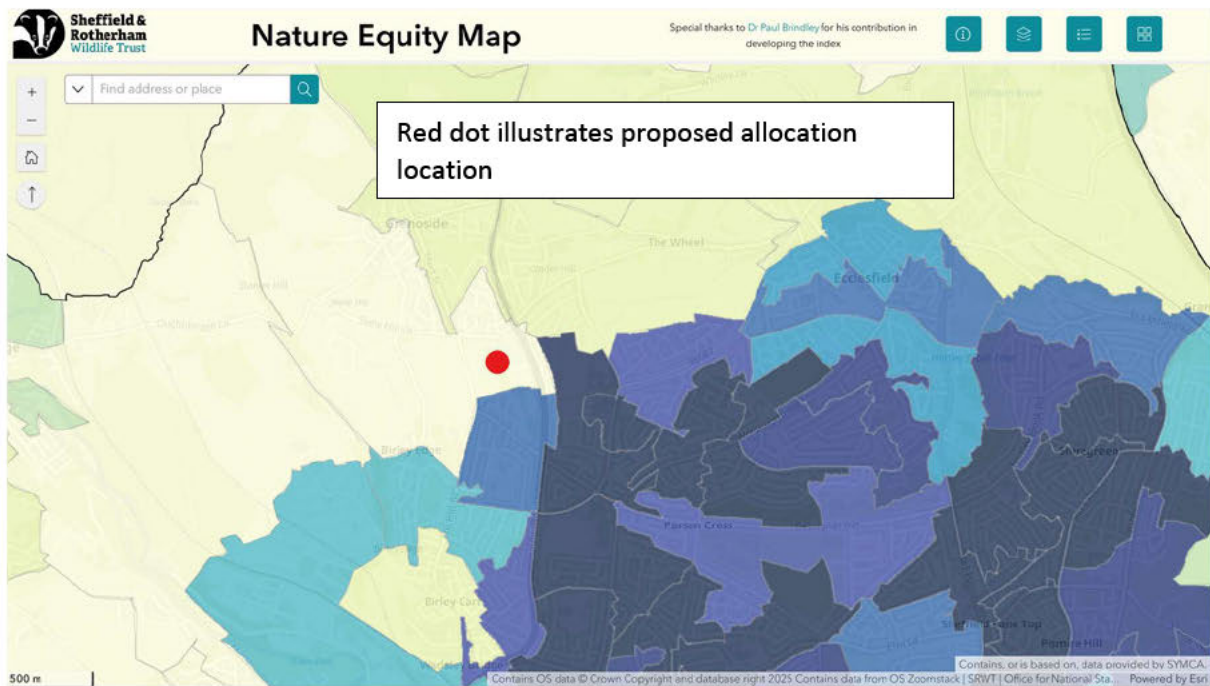
Holme Lane Farm and land to the west of Grenoside Grange, Fox Hill Road (Housing) - SCC Site Ref: NES38

Green Belt: The development site and the deletion of land if leading to development, would effectively merge Sheffield's large built up area with the village of Grenoside in visual and spatial terms. Whilst acknowledging that Grenoside is not a town and so purpose (b) of Green Belt would not be harmed, this merging would encroach harmfully on land that appears as open countryside and would detract from the villages character and open setting. It would appear as sprawl harming purpose (a) of the Green Belt. The land appears as open countryside with a visual relationship with the fields to the west and provides views of the wider landscape beyond, with the ribbon development on Halifax Road not having an urbanising influence. Development within this site risks being incongruous as a result.

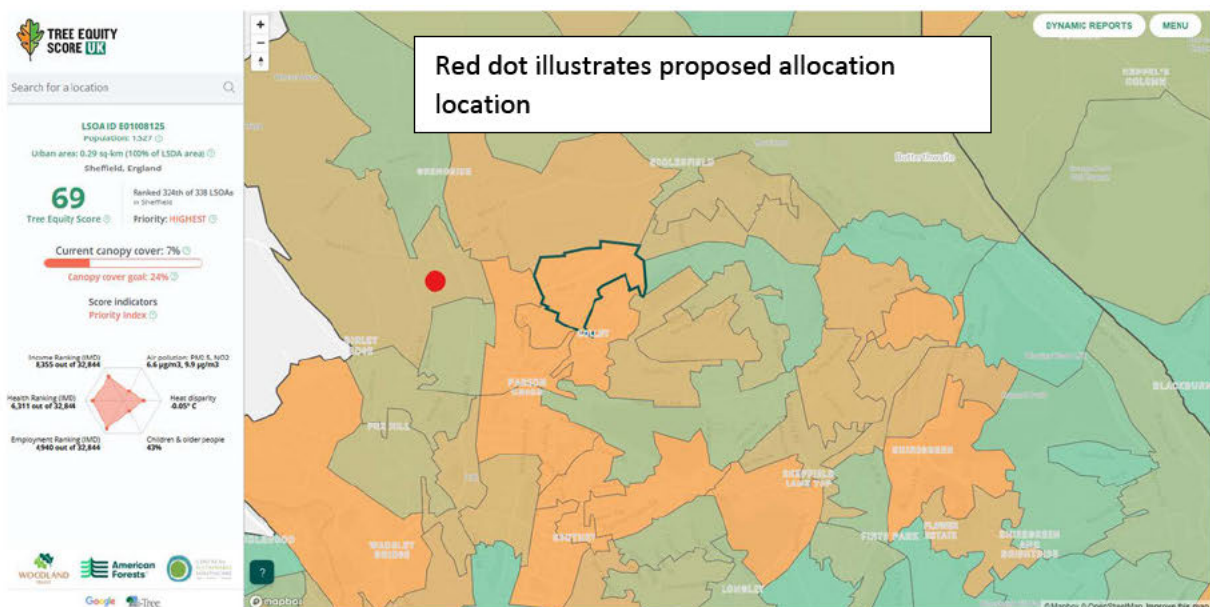
Wildlife Designations: Cowper Avenue Local Wildlife Site lies within the site. it is likely that the land would be a good candidate for identification as part of the core habitat network and also a good candidate for restoring and creating new habitat. The generic buffer of 15m is unlikely to be adequate according to the SRWT and the local plan [representation by JEH Planning](#) illustrates the likely harm to what is arguably part of the Core Habitat Network through increased disturbance and predation with residential development around the habitat network.

Nature Recovery: Not identified in the Natural England Habitat Network zones. However, given the presence of the Local Wildlife Site it is likely that the land would be a good candidate for making the core habitat network bigger, better and more connected in line with the associated aims of the NPPF, and it is likely that the SRWT has identified the land as being a priority for nature recovery.

Green Infrastructure and Public Rights of Way: Footpaths run through the site north to south and also across the southern edge of the site from west to east. The site has heritage assets and what appears to be the remnants of a lane runs through the site near the and has a pleasant vegetated character leading to Grimsall Round. The Sheffield and Rotherham Wildlife Trusts Nature Equity Map illustrates that the site is close to a significant number of people whom can be described as having low nature equity, factoring in: access to natural greenspace, environmental inequality, health inequality and income inequality using the English Indices of Deprivation.



The [Tree Equity Score UK](#) map based on the [Tree Equity Score UK methodology](#) also shows that the site is near to areas where people are on low incomes and have less benefit from the presence of tree canopy coverage.



Landscape Character and Green Belt Capacity Score: The site is identified as having a medium capacity to accommodate change in respect of landscape character in the Sheffield Landscape Character and Green Belt Capacity Study. The study claims that there is high scope to mitigate the effect of the development (a score of 1 in the assessment form on page 90 of the Study), yet this it is doubtful that mitigation would be effective in terms of local views and experience of the space as countryside especially within the site and from the west, with its intrinsic character and beauty as open countryside likely to be lost through suburbanisation as opposed to being enhanced.

Accessibility to Services and Facilities and Public Transport: The site is within 800m of the bus services on Halifax Road and service frequency is relatively high. The site is within 800m of a GP surgery. The site is within 800m of a local convenience store but it is not clear if any off-site works might be sought by SCC through the Local Wildlife Site to create a direct route to the Londis store to the south, to the detriment of the Local Wildlife Site or if any improvements will be done sensitively.

Suggested policy criteria should the site be allocated

The allocation policy should specify what accessibility, service and infrastructure improvements will be required to make the site sustainable and well located with regard to Table 1 in the SYSTRA Sheffield Local Plan Transport Assessment: Interim Report on Public Transport and Active Travel Impacts and Potential Mitigation (page 11) and this should not be left to a later planning application process.

SCC should heed the advice of the SRWT and seek to understand in detail adequate buffers to the habitat present and if these are achievable and this should not be left to a later planning application process.

A landscaping framework should be set out now and the key aims of it should be set out in the allocation policy and this should not be left to a later planning application process. This is necessary in order to ascertain how much mitigation can be achieved or not and the associated implications for impact and capacity.

Highway infrastructure improvements should be detailed in the allocation policy based on an understanding of the likely impacts of the development of the site. This will allow the impact of the development to be adequately understood, alongside its deliverability or developability.

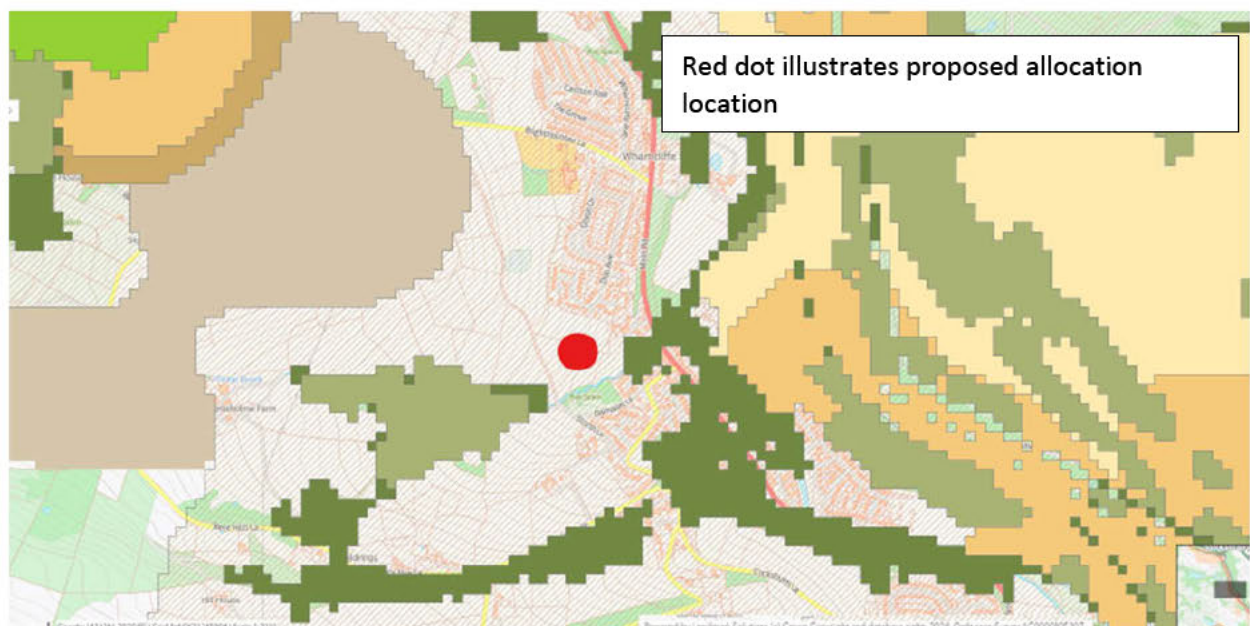
Appendix B: Site Assessments at Wharnccliffe Side and Oughtibridge

Land between Storth Lane and School Lane (Housing) - SCC Ref: NWS31

Green Belt: The development would physically link ribbons of development along Main Road as a finger of sprawl which would encroach into open countryside and harm purpose (c) of the Green Belt. The land appears as open countryside with a visual relationship with the fields to the west and provides views of the wider landscape beyond and also forms part of a break in the settlement of Wharncliffe Side.

Wildlife Designations: There is a linear section of Glen Howe Park Local Wildlife Site running along the southern side of the site and an area mapped as ancient woodland. It is likely that the minimum buffer to the Local Wildlife Site is inadequate and the SRWT will make a representation to this effect.

Nature Recovery: The site has significant areas covered by a Network Enhancement Zone 2 and the area around the Local Wildlife Site and Ancient Woodland mapped to the west would make a logical zone for nature recovery. The evidence of the SRWT should be carefully considered in respect of the priority of the land for nature recovery.



Green Infrastructure and Public Rights of Way:

A footpath runs along the southern side of the site and a restricted by-way runs to the west. These link to the network of public rights of way which allow the walker to wander to More Hall Reservoir, Glen Howe and Spout House Hill. The land is part of a corridor of countryside running down to Main Road and the River Don. The site currently drains into a stream and beyond and should be considered for natural flood management measures.

Landscape Character and Green Belt Capacity Score: The site is identified as having a medium capacity to accommodate change in respect of landscape character in the Sheffield Landscape Character and Green Belt Capacity Study. The study claims that there is high scope to mitigate the effect of the development (a score of 1 in the assessment form on page 61 of the Study), yet this it is doubtful that mitigation would be effective in terms of local views and experience of the space as countryside especially within the site and from the surrounding footpath network, with its intrinsic character and beauty as open countryside likely to be lost through suburbanisation as opposed to being enhanced. The site forms part of the setting to the restricted byway to the west and the proposal risks the loss of this lanes pleasant and relatively quiet character. If the site were used to for nature recovery enhancements to expand the existing core habitat network it would also enhance the tranquility and intrinsic beauty of this part of countryside and its contribution to the spaces in and around Sheffield which people benefit from in terms their physical and mental health and well-being.

Accessibility to Services and Facilities and Public Transport: The site is within 800m of a bus stop with a good bus service but is only within 800m of a primary school and no other key services or facilities. This is not a relatively well-located site in terms of opportunities for active travel to access day to day services and facilities.

Suggested policy criteria should the site be allocated:

The allocation policy should specify what accessibility, service and infrastructure improvements will be required to make the site sustainable and well located with regard to Table 1 in the SYSTRA Sheffield Local Plan Transport Assessment: Interim Report on Public Transport and Active Travel Impacts and Potential Mitigation (page 11) and this should not be left to a later planning application process.

SCC should heed the advice of the SRWT and seek to understand in detail adequate buffers to the habitat present and if these are achievable and this should not be left to a later planning application process.

A landscaping framework should be set out now and the key aims of it should be set out in the allocation policy and this should not be left to a later planning application process. This is necessary in order to ascertain how much mitigation can be achieved or not and the associated implications for impact and capacity.

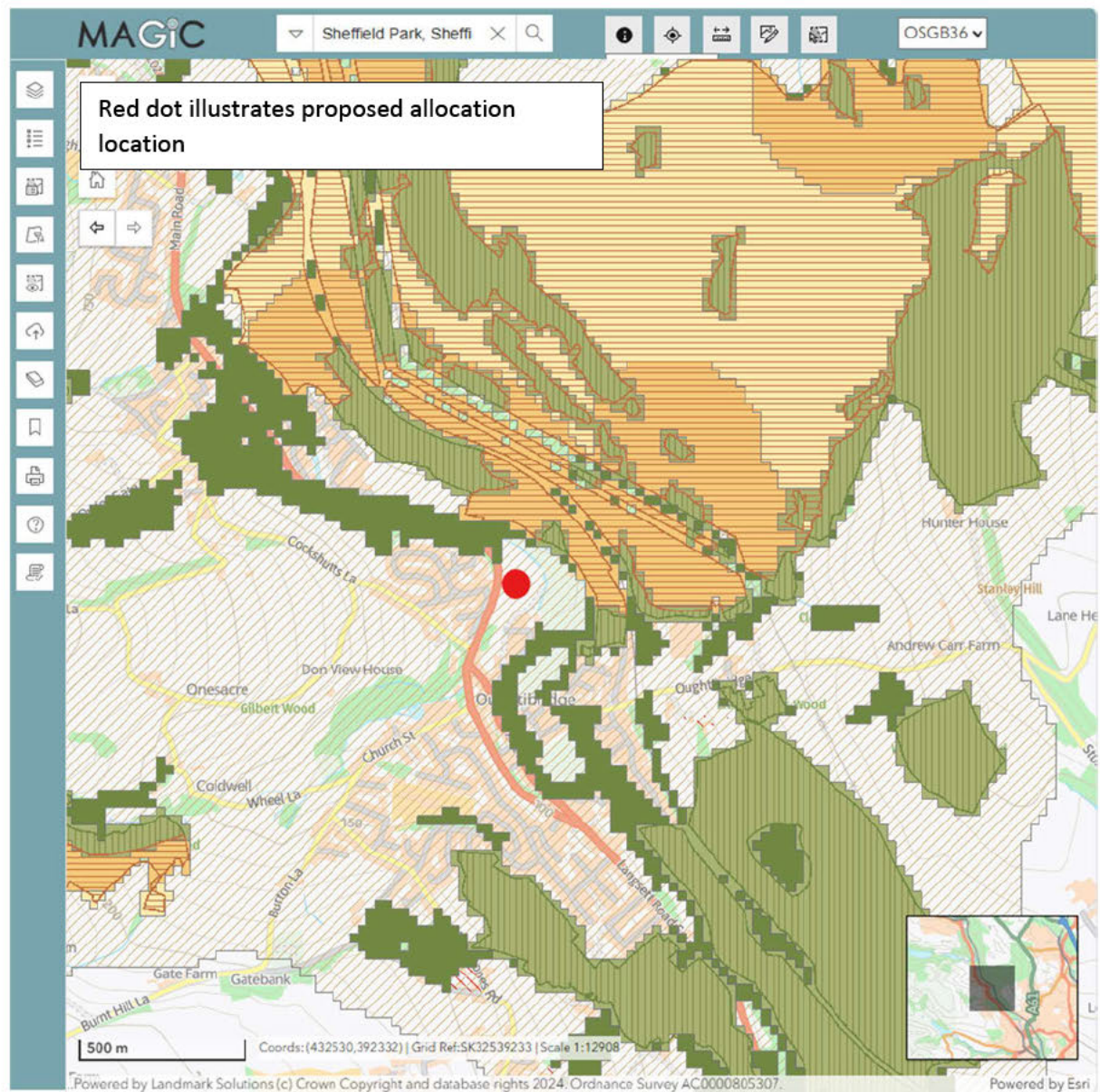
Highway infrastructure improvements should be detailed in the allocation policy based on an understanding of the likely impacts of the development of the site. This will allow the impact of the development to be adequately understood, alongside its deliverability or developability.

Land at Forge Lane (Housing) - SCC Ref NWS30

Green Belt: The land appears as open countryside with a visual relationship with the River Don's wooded corridor and the woodland to the north and east and the development would make for an intrusive sight, encroaching into open countryside and harming purpose (c) of Green Belt.

Wildlife Designations: The site is close to Usher Wood Local Wildlife Site and the Upper River Don Local Wildlife Site appears to adjoin the allocation, albeit the proposed allocation policy indicates an area of urban greenspace and no mention of a specific buffer to the woodland in the adjacent LWS.

Nature Recovery: The site is covered by the Network Enhancement Zone 2 on the Natural England Habitat Network map. The land would make a logical and significant extension of the Local Wildlife Site to the north west as a nature recovery area. The evidence of the SRWT should be carefully considered in respect of the priority of the land for nature recovery, as the land could make the River Dons wildlife corridor bigger, better and more connected.



Green Infrastructure and Public Rights of Way: The site has no public footpath's across it on the definitive map but has informal recreational use and paths cross the open land. Sheffield Canoe Club has a building adjacent to the site by the playing fields. There is mention in the proposed allocation policy of a pedestrian and cycle route on the site's eastern boundary which would, *'form part of improvements to the Upper Don Trail which, in this locality, will link Forge Lane with Oughtibridge Mill'*. However, it is not clear how this would be the case unless a bridge link is provided across the River Don, which is unlikely given typical viability arguments from developers for contributing less to such infrastructure provision as opposed to more, the brownfield developments upstream being examples of such an issue.

Landscape Character and Green Belt Capacity Score: The site is identified as having a higher capacity to accommodate change in respect of landscape character in the Sheffield Landscape Character and Green Belt Capacity Study. The study claims that there is high scope to mitigate the effect of the development (a score of 1 in the assessment form on page 57 of the Study), yet this it is doubtful that mitigation would be effective in terms of local views and experience of the space as countryside especially within the site and from the surrounding views on public highways, with its intrinsic character and beauty as open countryside likely to be lost through suburbanisation as opposed to being enhanced. The site would have a 'relationship' with the built up area in so much as it would extend the intrusion of the Forge Lane housing development into the rivers setting, being a harsh contrast to the open grassland and woodland which currently dominates views and appreciation of this part of the Don Valley. As such the score of 1 for its *'Relationship with existing urban built form/edge'* is questionable and a 2 would seem more appropriate. Similarly given the views from the footway on Langsett Road North towards the site it seems inappropriate to score the site as a 1 only in relation to *'public view'*. The illustrative plan in the [Regulation 19 representation](#) made by Lichfields on behalf of Commercial Estates Group (CEG) helps illustrate the likely intrusion into the setting of the river.

Accessibility to Services and Facilities and Public Transport: The site is within 800m of a GP's, Pharmacy, convenience store, playground and bus stops with a good service. However, the site is over 800m from a primary school and is therefore not well located albeit being one of the more accessibly located proposal sites.

Suggested policy criteria should the site be allocated

The allocation policy should specify what accessibility, service and infrastructure improvements will be required to make the site sustainable and well located with regard to Table 1 in the SYSTRA Sheffield Local Plan Transport Assessment: Interim Report on Public Transport and Active Travel Impacts and Potential Mitigation (page 11) and this should not be left to a later planning application process.

SCC should heed the advice of the SRWT and seek to understand in detail adequate buffers to the habitat present and if these are achievable and this should not be left to a later planning application process.

A landscaping framework should be set out now and the key aims of it should be set out in the allocation policy and this should not be left to a later planning application process. This is necessary in order to ascertain how much mitigation can be achieved or not and the associated implications for impact and capacity.

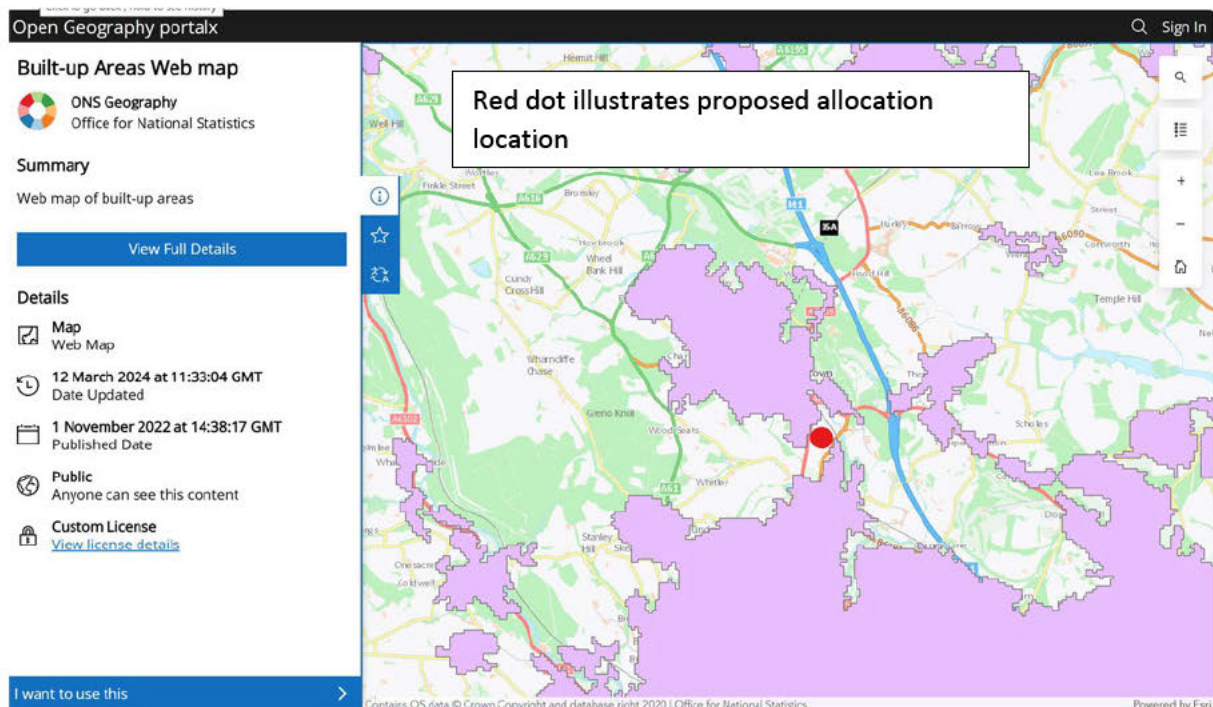
Highway infrastructure improvements should be detailed in the allocation policy based on an understanding of the likely impacts of the development of the site. This will allow the impact of the development to be adequately understood, alongside its deliverability or developability.



Appendix C: Site Assessments at Chapeltown and High Green

Land to the east of Chapeltown Road (Housing) - Site Ref: CH05

Green Belt: The site if developed would be likely to physically and visually merge the town of Chapeltown with Sheffield, linking the two by extending the large built up area of Sheffield with Sprawl, which would conflict with purposes (a) and (b) of the Green Belt, and fundamentally prejudicing the role of the Green Belt in preventing neighbouring towns merging into one another. The map below illustrates the point by showing the the [ONS web map for 'Built Up Areas'](#)¹⁷ in a coarse manner, whilst a site visit will reinforce the spatial and visual effect, and effect on character which is likely to result from allocating and developing the site for housing.



¹⁷ [Built-up Areas Web map | Open Geography Portal](#)

Wildlife Designations: The proposed site allocation does not contain a wildlife designation but is close to the Local Wildlife Sites of Smithy Wood Tip, Hunshelf Quarry and Blackburn Brook. The associated deletion of Green Belt to the north of the proposed housing allocation covers the Blackburn Brook LWS and would have the knock on effect of reducing the protections afforded to this wildlife corridor and element of the Core Habitat Network.

Nature Recovery: The site is predominantly outside of the Natural England Habitat Network mapped areas/zones and is unlikely to be of strategic importance to local nature recovery. However, the site is nearly 20 hectares in area and at this size could conceivably be managed as a habitat bank and a receptor site for biodiversity net gain, Sheffield currently lacking such a natural capital asset.

Green Infrastructure and Public Rights of Way: South of the sites boundary is part of the Sheffield Country Walk route and public right of way, whilst another public right of way (a path) cuts across the middle of the site from west to east and provides a convenient and direct route to and from the post 16 college Chapeltown Academy. The site appears to be provisionally identified as Grade 3 on the [agricultural land classification map for Yorkshire and the Humber \(ALC003\)](#).

Landscape Character and Green Belt Capacity Score: The site is identified as having a low capacity to accommodate change in respect of landscape character in the Sheffield Landscape Character and Green Belt Capacity Study. The study claims that there is moderate scope to mitigate the effect of the development (a score of 2 in the assessment form on page 106 of the Study), yet this it is doubtful that mitigation would be effective in terms of local views and the experience of the space as countryside especially within the site and from the surrounding footpath network, with its intrinsic character and beauty as open countryside likely to be lost through suburbanisation.

Accessibility to Services and Facilities and Public Transport: A large proportion of the site is over 800m from a local convenience store (ALDI to the south) and GP's, although these exist within 1200m of the majority of the site. A large proportion of the site is just over 800m from a primary school but the site is within 800m of a secondary school and a post 16 college. There are bus stops nearby on Ecclesfield Road where advertised services are frequent.

Suggested policy criteria should the site be allocated

The allocation policy should specify what accessibility, service and infrastructure improvements will be required to make the site sustainable and well located with regard to Table 1 in the SYSTRA Sheffield Local Plan Transport Assessment: Interim Report on Public Transport and Active Travel Impacts and Potential Mitigation (page 11) and this should not be left to a later planning application process.

SCC should heed the advice of the SRWT and seek to understand in detail adequate buffers to the habitat present and if these are achievable and this should not be left to a later planning application process.

A landscaping framework should be set out now and the key aims of it should be set out in the allocation policy and this should not be left to a later planning application process. This is necessary in order to ascertain how much mitigation can be achieved or not and the associated implications for impact and capacity.

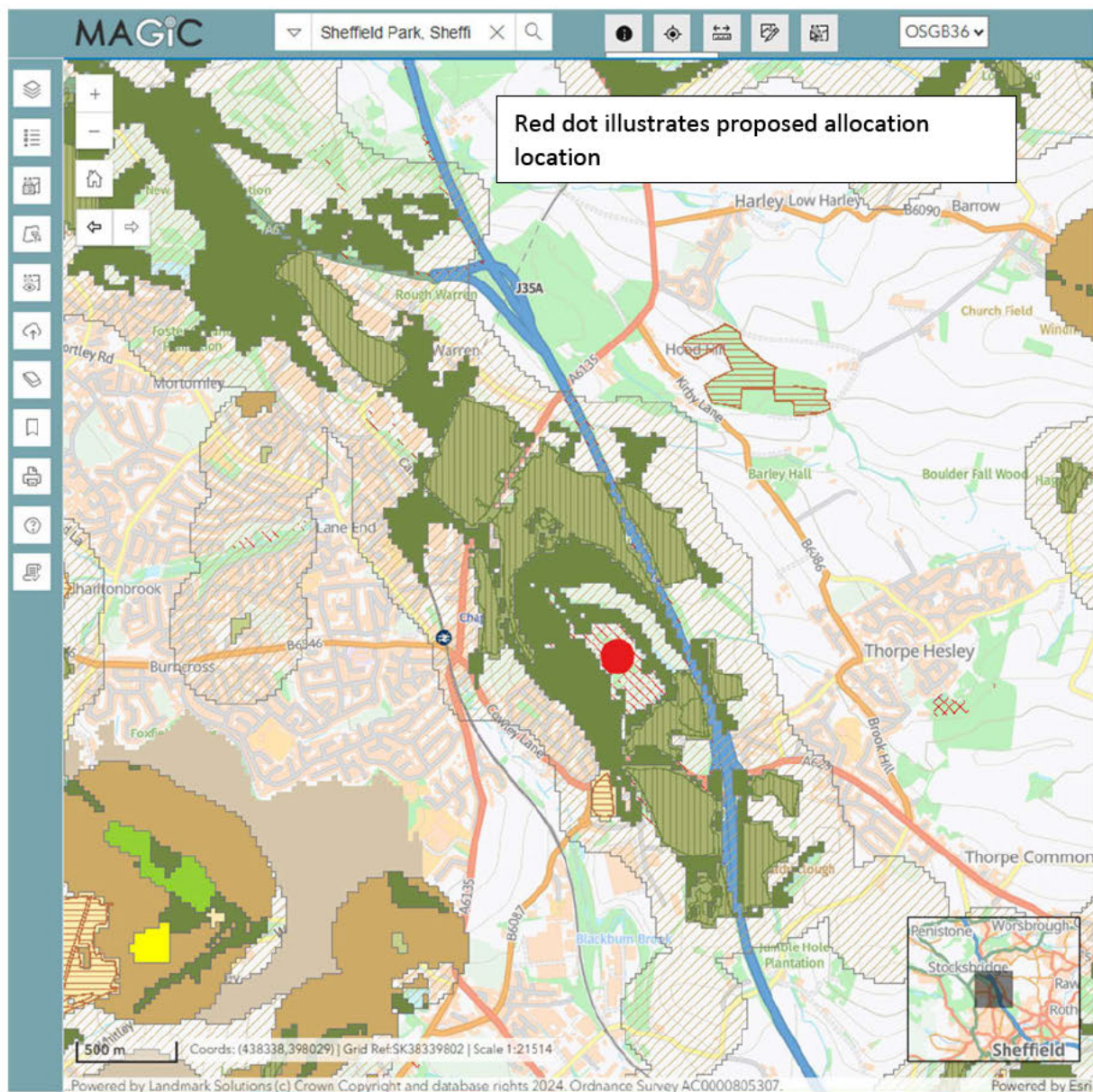
Highway infrastructure improvements should be detailed in the allocation policy based on an understanding of the likely impacts of the development of the site. This will allow the impact of the development to be adequately understood, alongside its deliverability or developability.

Hesley Wood, north of Cowley Hill (Employment) - SCC Site Ref: CH04

Green Belt: The site is isolated and sporadic with no physical relationship with Chapeltown's built up area, the site being surrounded by woodland.

Wildlife Designations: The site allocation adjoins and is surrounded by the Hesley Tip Local Wildlife Site. To the north is the Hesley Wood and Chapeltown Park Local Wildlife Site. It is likely that the minimum buffer to the Local Wildlife Site is inadequate and the SRWT will make a representation to this effect.

Nature Recovery: The site is surrounded by core habitat and is identified on the Natural England Habitat Network Map as Network Enhancement Zone 2 (see map below). The land would make a logical and significant extension of the Local Wildlife Site surrounding it.



The evidence of the SRWT should be carefully considered in respect of the priority of the land for nature recovery, as the land could make the ecological network bigger, better and more connected. The site forms a logical place for land reclamation through rewilding, a process which has progressed over the last twenty years. Its development would impact on the surrounding Local Wildlife Site and might result in harm beyond that possible with the current site allocation boundary, bearing in mind the more expansive site boundary and indicative layout shown by Rula Developments in their [Regulation 19 representation](#) to the pre-submission Local Plan as shown below.

Figure 2.7 Hesley Wood Indicative Masterplan



Source: Spawforths, 2023

Green Infrastructure and Public Rights of Way: The site has no public rights of way on the definitive map but is used informally for recreation. The sites development would also reduce the positive buffer effect of the open land and vegetation in mitigating noise impacts from the M1 on the nearby housing estate to the south west and would also introduce uses with the potential to harm the amenity of nearby residences though noise pollution.

Landscape Character and Green Belt Capacity Score: The Sheffield Landscape Character and Green Belt Capacity Study does not assess the site. The site is well screened currently by woodland and also forms the backdrop to the Hesley Wood Scout activity centre and campsite, a green backdrop giving a sense of natural beauty. The harm which would result from having an industrial estate as a backdrop to young people's outdoor experiences at the activity centre and campsite is arguably significant, removing an opportunity for young people to experience relatively natural surroundings and the associated perception of beauty and tranquility.

The site allocation also contains part of the woodland which forms a backdrop to Chapeltown Park. This intrinsic beauty could be significantly harmed by employment development through the loss of trees, visual intrusion, lighting and noise. The site is elevated due to spoil deposition and there is concern at where the spoil may end up should the development happen. The impact of addressing the spoil heaps should be factored in at this stage of plan making.

Accessibility to Services and Facilities and Public Transport: The majority of the site is not within walking distance of a bus stop but is near to cycling infrastructure. However, the site is arguably not well located in respect of public transport.

Suggested policy criteria should the site be allocated:

There should be a specific policy requirement to ensure that surrounding screening woodland is retained and enhanced, with views from the Hesley Wood Scout Activity Centre amongst those views identified to be screened.

There should be a limitation on the types of employment uses to mitigate against noise and air pollution from detracting from the amenity and perceived natural beauty of the nearby Hesley Wood Scout campsite, residences to the south and the Chapeltown Park to the south west.

There should be a specific requirement for minimising light, noise and air pollution beyond the currently proposed policies in the emerging plan.

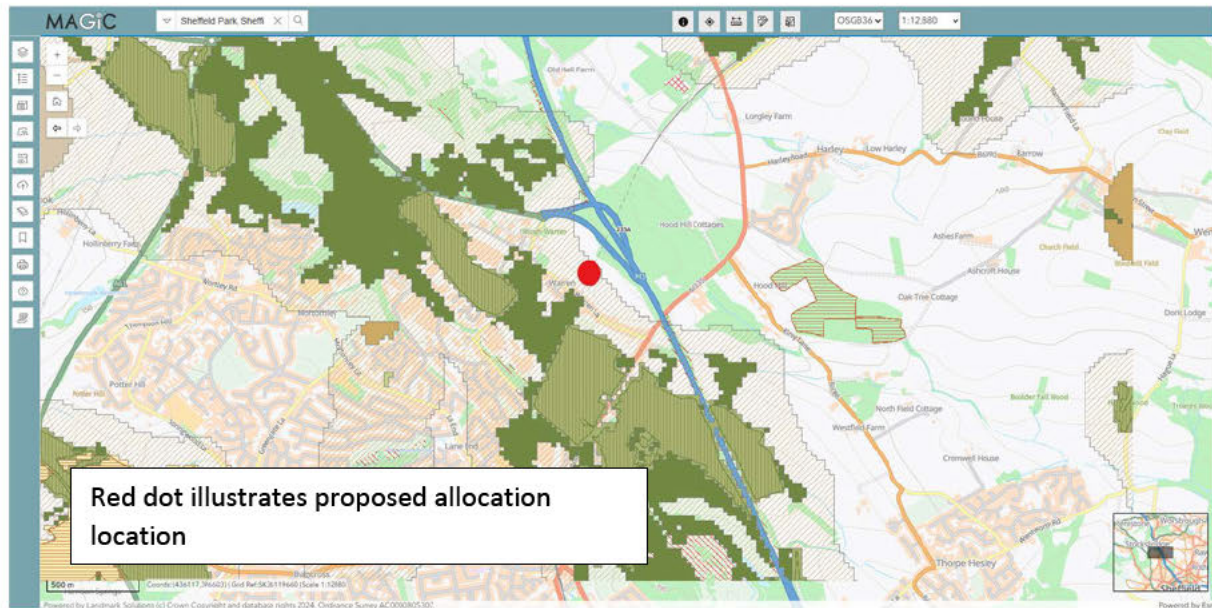
There should be specific requirements to enhance surrounding woodland in terms of biodiversity and public access.

There should be specific requirements for the provision of a bus services and stops and active travel links to and within the site beyond the currently proposed policies in the emerging plan.

Land bordered by M1, Thorncliffe Road, Warren Lane, and White Lane (Employment) - Site Ref: CH03

The site's agricultural land classification should be established given that the site appears to be provisionally identified as Grade 3 on the [agricultural land classification map for Yorkshire and the Humber \(ALC003\)](#).

The site is within the Network Enhancement Zone 2 on the Natural England Habitat Network map.



The site forms a buffer between the M1 and the residences to the south and the development of the site for employment uses would erode this environmental buffer and have the potential for adverse effects on the people living along Warren Lane.

The site is not well located in respect of existing public transport and active travel infrastructure provision.

Suggested policy criteria should the site be allocated

There should be a limitation on the types of employment uses to mitigate against noise and air pollution from detracting from the amenity of residences to the south.

There should be a specific requirement for minimising light, noise and air pollution beyond the currently proposed policies in the emerging plan.

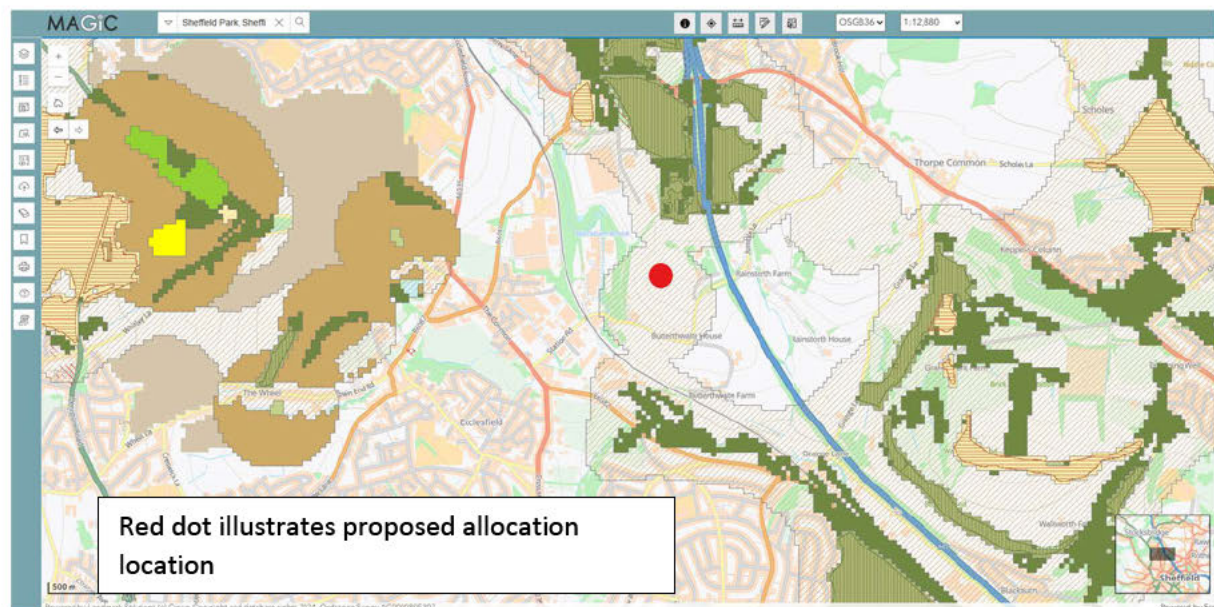
There should be a specific policy to ensure effective soft (vegetation) landscape screening for the homes to the south.

Land to the south of the M1 Motorway Junction 35 (Employment) - SCC Site Ref: NES36

The site's agricultural land classification should be established given that the site appears to be provisionally identified as Grade 3 on the [agricultural land classification map for Yorkshire and the Humber \(ALC003\)](#).

The site adjoins the Smithy Wood Local Wildlife Site and is within a Network Enhancement Zone 2 on the Natural England Habitat Network map. It is likely that the minimum buffer to the Local Wildlife Site is inadequate and the SRWT will make a representation to this effect.

It would make a logical location for achieving strategic nature recovery aims and objectives with a bigger, better and more connected ecological network.



The site is not well located in respect of existing public transport and active travel infrastructure provision.

Two public rights of way run through the site, one of which is part of the Sheffield Country Walk route. The site and its footpaths afford extensive views to the west towards Grenoside Woods.

Appendix D: Site Assessments at Handsworth, Shirtclif and Charnock

Handsworth Hall Farm, Land at Finchwell Road (Housing and Employment) - SCC Site Ref: SES29

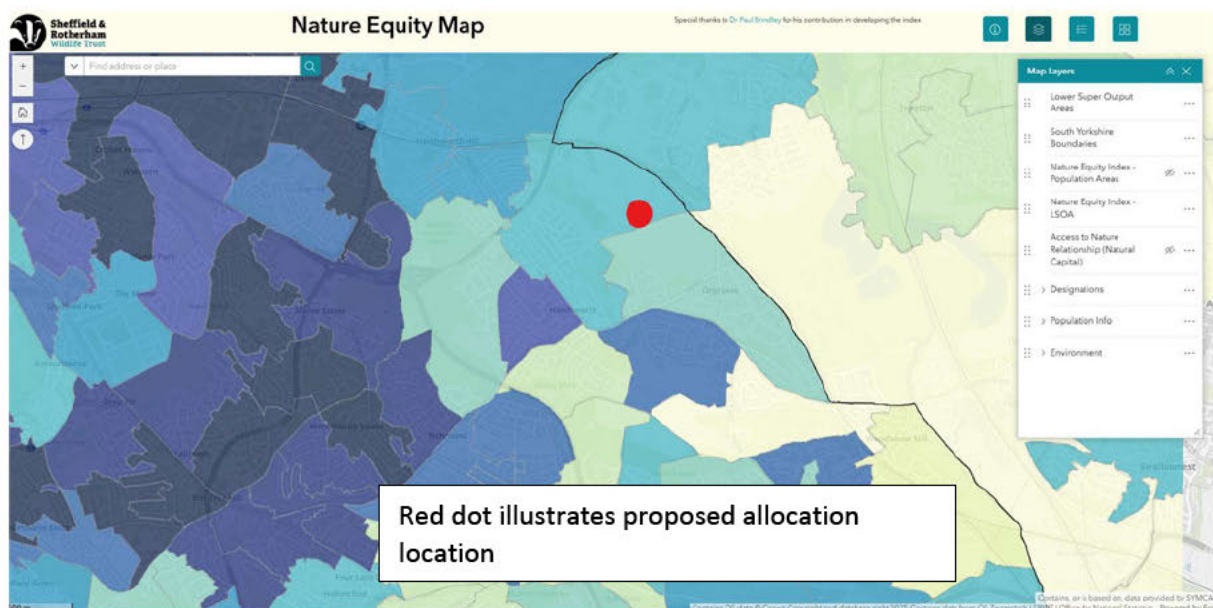
Green Belt: The Site appears already enclosed by development to a greater degree but will if developed represent a further merging of the large built up area of Rotherham, with the new development at Waverley joining in spatial and visual terms with the proposed allocation and coalescing Sheffield more so with Rotherham. This would conflict with purpose (b) of the Green Belt.



Wildlife Designations: The site adjoins Handsworth Tip Local Wildlife Site and contains Waverly Pond Local Wildlife Site. It is likely that the minimum buffer to the Local Wildlife Sites are inadequate and the SRWT will make a representation to this effect. Enclosing a Local Wildlife Site within a residential allocation could harm the sites protection contrary to NPPF paragraph 174 (a) and (d) and also paragraph 179 (a) and (b).

Nature Recovery: Whilst the site is not identified in the Natural England Habitat Network zones the presence of the Local Wildlife Sites as core habitat and also the habitat corridors adjacent to the railway to the north give the site an obvious potential to expand the ecological network.

Green Infrastructure and Public Rights of Way: There are areas nearby with relatively low nature equity scores score on the Sheffield and Rotherham Wildlife Trusts [Nature Equity Map](#) and the site is accessible via a public right of way running between Handsworth and Waverly. The surrounding locality is relatively urbanised and the site appears as a last vestige of countryside separating Sheffield from Rotherham. It is part of a network of green spaces which provide mental relief for residents from the harsher suburban and urban surroundings. It appears as a logical place for **new urban accessible natural greenspace** to serving the locality with enhancements to accessibility and biodiversity to go somewhat towards addressing economic, social and health inequalities. The Sheffield Open Space Study: South East Area Profile notes a shortfall of 34.55ha of publicly accessible open space in the wider locality, specifically in the typologies of allotments, parks and recreation grounds, children's play and youth play spaces. The study estimates population growth to be likely to require a further 13.14ha of new open space provision and does not factor in the proposed housing allocation. The proposed allocation should be cognisant of the situation and provide specific measures to avoid worsening the shortfall in the wider locality.



Landscape Character and Green Belt Capacity Score: The site is identified as having a low capacity to accommodate change in respect of landscape character in the Sheffield Landscape Character and Green Belt Capacity Study. The study claims that there is moderate scope to mitigate the effect of the development (a score of 2 in the assessment form on page 214 of the Study), yet this it is doubtful that mitigation would be effective in terms of local views and the experience of the space as countryside especially within the site and from the surrounding footpath network, with its intrinsic character and beauty as open countryside likely to be lost through suburbanisation.

Accessibility to Services and Facilities and Public Transport: Large parts of the site are likely to be over 800m from a primary school, GP and convenience store. Whilst Handsworth Road is timetabled with a high frequency bus service, large areas of the development will be over 800m from the existing bus stops and a new route with stops would likely be necessary to serve the site. Without the provision of active travel links, new social infrastructure the site would not be well located. The potential for a strategic train/light rail/tram station within the site is positive from a sustainable travel point of view but nevertheless the need for more local accessibility would remain.

Suggested policy criteria should the site be allocated

The overarching objectives of any master plan for the allocation should be specified e.g. a transit and active travel orientated development which provides substantial new accessible natural greenspace which links into the existing habitat and green infrastructure network.

The policy should specify that any master plan will be prepared with design policies that are developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics in line with paragraph 129 of the 2023 NPPF and paragraph 132 of the 2024 NPPF.

The allocation policy should specify what accessibility, service and infrastructure improvements will be required to make the site sustainable and well located with regard to Table 1 in the SYSTRA Sheffield Local Plan Transport Assessment: Interim Report on Public Transport and Active Travel Impacts and Potential Mitigation (page 11) and this should not be left to a later master plan and planning application process.

SCC should heed the advice of the SRWT and seek to understand in detail adequate buffers to the habitat present and if these are achievable and this should not be left to a later master plan and planning application process.

A landscaping framework should be set out now and the key aims of it should be set out in the allocation policy and this should not be left to a later master plan or planning application process. This is necessary in order to ascertain how much mitigation can be achieved or not and the associated implications for impact and capacity.

Highway infrastructure improvements should be detailed in the allocation policy based on an understanding of the likely impacts of the development of the site. This will allow the

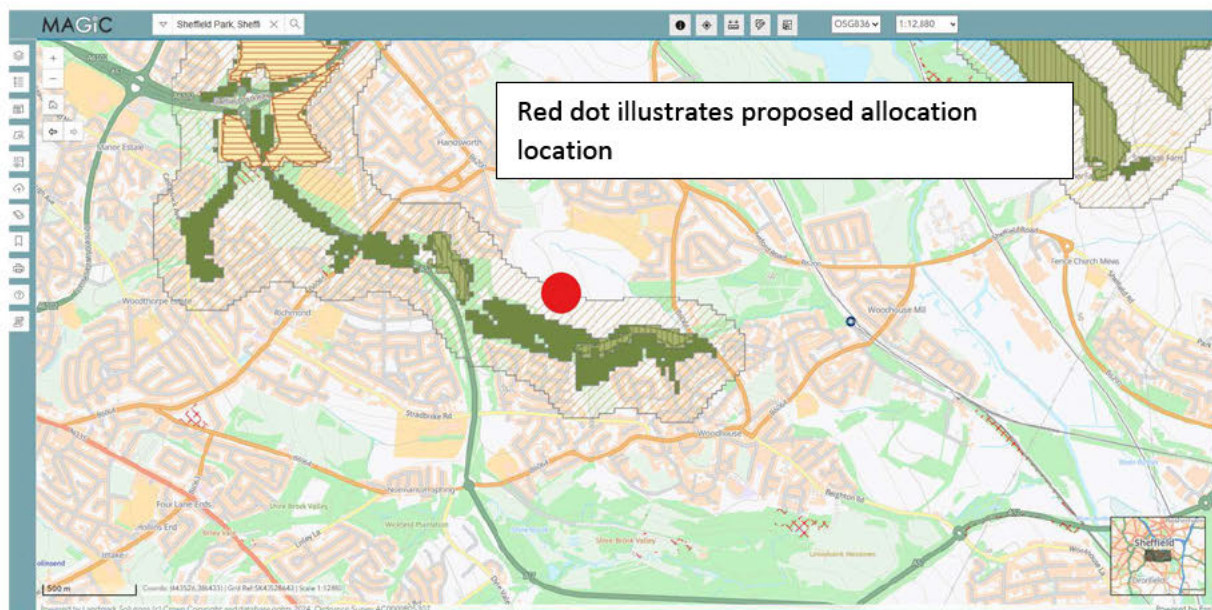
impact of the development to be adequately understood, alongside its deliverability or developability.

Land between Bramley Lane and Beaver Hill Road (Housing) - SCC Site Ref: SES30

Green Belt: The site is surrounded by suburban and urban development but its development would represent encroachment of development into land which has the appearance of open countryside.

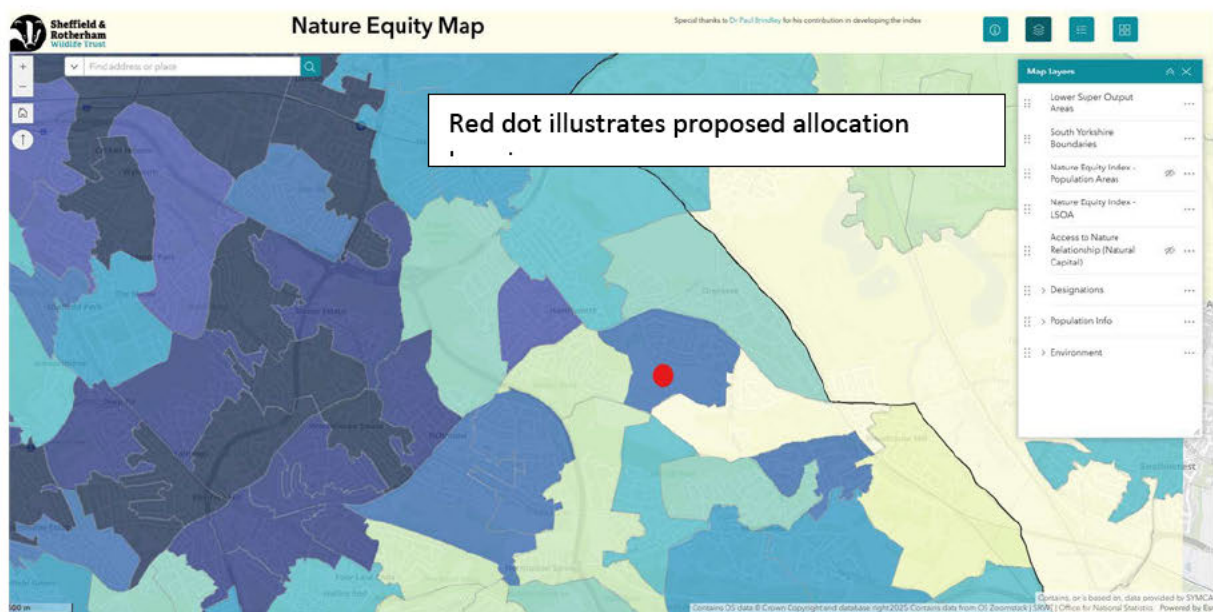
Wildlife Designations: Shirtclif Valley Grasslands, Wood and Fields Local Wildlife Sites adjoin to the south and Smelter Wood Local Wildlife Site adjoins to the west. It is likely that the minimum buffer to the Local Wildlife Sites are inadequate and the SRWT will make a representation to this effect, the recommended buffer is likely to be significantly more than put forward by SCC and in the region of 100m.

Nature Recovery: The site has a significant part of it covered by the Network Enhancement Zone 2 on the Natural England Habitat Network map. The land would make a logical and significant extension of the Local Wildlife Sites to the south as a nature recovery area. The evidence of the SRWT should be carefully considered in respect of the priority of the land for nature recovery, as the land could make the ecological network in this populated area bigger, better and more connected.



Green Infrastructure and Public Rights of Way: The LSOA within which part of the site sits has a low nature equity score on the Sheffield and Rotherham Wildlife Trusts [Nature Equity Map](#) and the site is accessible via multiple public rights of way. Areas in the locality are shown as a moderate priority on the tree equity map.

The locality is relatively suburbanised but the site is part of a wider tract of open land running from Flockton Park Woodland to Castlebeck. It is part of a network of green spaces which provide mental relief for residents from the harsher suburban and urban surroundings. This network links into fingers of greenspace which run through the area linking to Shire Brook Nature Reserve and Richmond Heights Open Space. It appears as a logical place for **new urban accessible natural greenspace with the potential** for tree planting to slow rainfall run off and to expand and enhance the open space network serving the locality with enhancements to accessibility and biodiversity to go some way towards addressing economic, social and health inequalities.



The site appears to be provisionally identified as Grade 3 on the [agricultural land classification map for Yorkshire and the Humber \(ALC003\)](#).

The Sheffield Open Space Study: South East Area Profile notes a shortfall of 34.55ha of publicly accessible open space in the wider locality, specifically in the typologies of allotments, parks and recreation grounds, children's play and youth play spaces. The study estimates population growth to be likely to require a further 13.14ha of new open space provision and does not factor in the proposed housing allocation. The proposed allocation should be cognisant of the situation and provide specific measures to avoid worsening the shortfall in the wider locality.

Landscape Character and Green Belt Capacity Score: The site is identified as having a low capacity to accommodate change in respect of landscape character in the Sheffield Landscape Character and Green Belt Capacity Study. The study claims that there is 'good' scope to mitigate the effect of the development (a score of 1 in the assessment form on page 215 of the Study), yet this it is doubtful that mitigation would be effective in terms of local views and the experience of the space as countryside especially within the site and from the surrounding footpath network, with this area of countryside's intrinsic character and beauty likely to be lost through suburbanisation.

Accessibility to Services and Facilities and Public Transport: The site is within 800m of a high frequency bus service on Beaver Hill Road but the footpath network leading north from the proposed residential allocation is of limited quality to provide access to the nearest GP's within 800. The site is close to a primary and a secondary school. There is a convenience store within 800m to the north west of the site but again the quality of the footpath network in terms of accessibility is limited.

Suggested policy criteria should the site be allocated

The allocation policy should specify what accessibility, service and infrastructure improvements will be required to make the site sustainable and well located with regard to Table 1 in the SYSTRA Sheffield Local Plan Transport Assessment: Interim Report on Public Transport and Active Travel Impacts and Potential Mitigation (page 11) and this should not be left to a later planning application process.

SCC should heed the advice of the SRWT and seek to understand in detail adequate buffers to the habitat present and if these are achievable and this should not be left to a later planning application process.

A landscaping framework should be set out now and the key aims of it should be set out in the allocation policy and this should not be left to a later planning application process. This is necessary in order to ascertain how much mitigation can be achieved or not and the associated implications for impact and capacity.

Highway infrastructure improvements should be detailed in the allocation policy based on an understanding of the likely impacts of the development of the site. This will allow the impact of the development to be adequately understood, alongside its deliverability or developability.

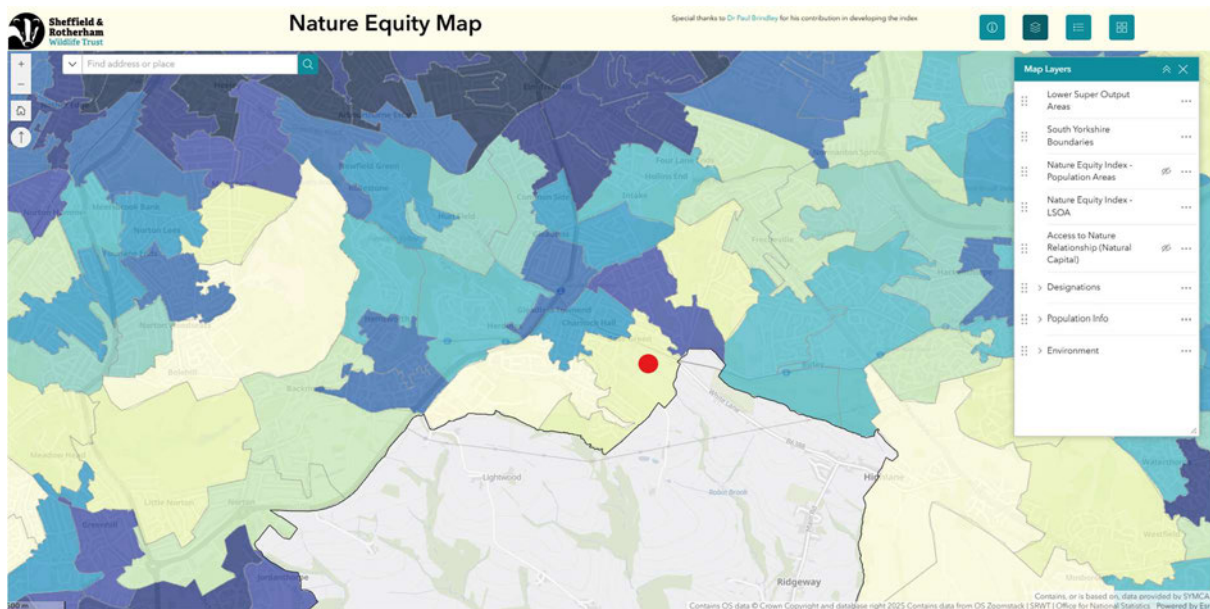
Land to the south of White Lane (Housing) - SCC Site Ref: SS19

Green Belt: The residential development of the proposed housing site would appear as a rounding off of the large built up area. However, it would encroach into land that appears as open countryside.

Wildlife Designations: None

Nature Recovery: The site has significant areas covered by a Network Enhancement Zone 1 and would make a logical zone for nature recovery. The evidence of the SRWT should be carefully considered in respect of the priority of the land for nature recovery.

Green Infrastructure and Public Rights of Way: A bridleway runs to the south of the residential site allocation and within the deletion area but the proposed residential site has no public rights of way running through it. A public footpath lies away from the eastern edge of the site with views of the allocation site. The Sheffield and Rotherham Wildlife Trusts [Nature Equity Map](#) illustrates that the site is close to a significant number of people whom can be described as having low nature equity, factoring in: access to natural greenspace, environmental inequality, health inequality and income inequality using the [English Indices of Deprivation](#). Areas in the locality are shown as a moderate priority on the tree equity map.



Landscape Character and Green Belt Capacity Score: The site is identified as having a medium capacity to accommodate change in respect of landscape character in the Sheffield Landscape Character and Green Belt Capacity Study.

Accessibility to Services and Facilities and Public Transport: The site is within 800m well of a tram stop and service on White Lane with a high frequency of service. There is a co-op, a play area, a primary school and a GP's within 800m. The site is well located provided the capacity of nearby services is adequate.

Suggested policy criteria should the site be allocated

The allocation policy should specify what accessibility, service and infrastructure improvements will be required to make the site sustainable and well located with regard to Table 1 in the SYSTRA Sheffield Local Plan Transport Assessment: Interim Report on Public

Transport and Active Travel Impacts and Potential Mitigation (page 11) and this should not be left to a later planning application process.

SCC should heed the advice of the SRWT and seek to understand in detail adequate buffers to the habitat present and if these are achievable and this should not be left to a later planning application process.

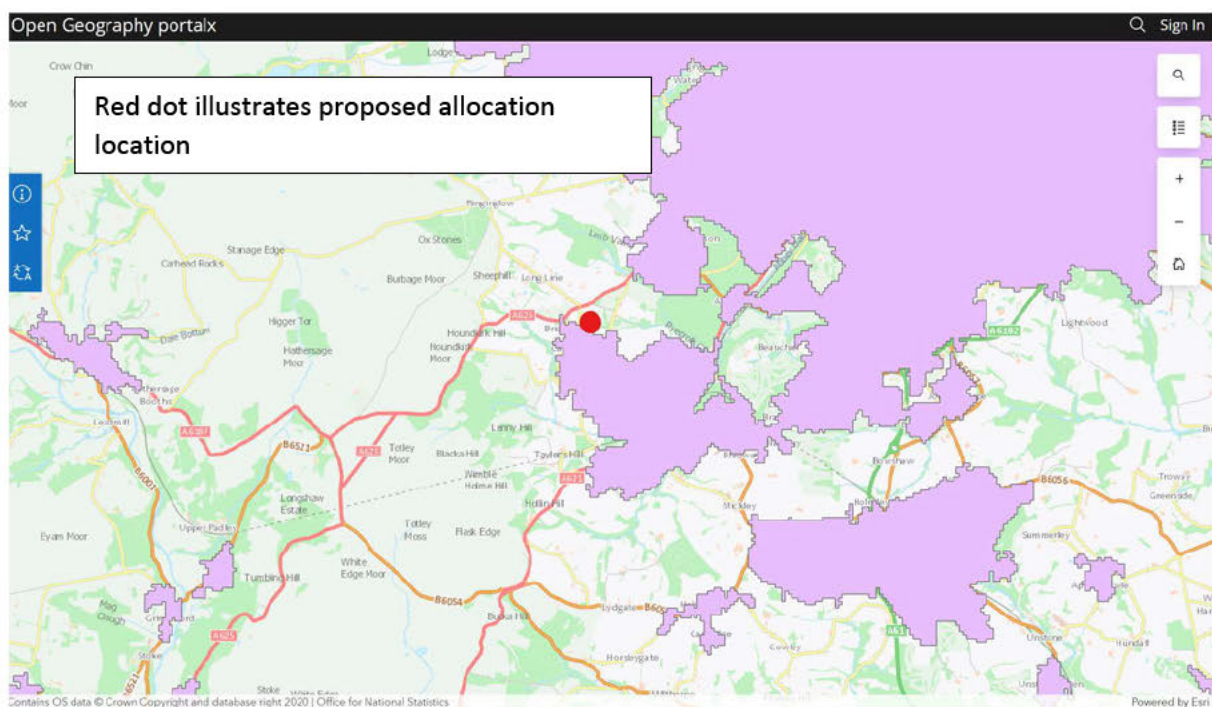
A landscaping framework should be set out now and the key aims of it should be set out in the allocation policy and this should not be left to a later planning application process. This is necessary in order to ascertain how much mitigation can be achieved or not and the associated implications for impact and capacity.

Highway infrastructure improvements should be detailed in the allocation policy based on an understanding of the likely impacts of the development of the site. This will allow the impact of the development to be adequately understood, alongside its deliverability or developability.

Appendix D: Site Assessments at Dore and Fulwood

Land to the north of Parkers Lane (Housing) - SCC Site Ref: SWS19

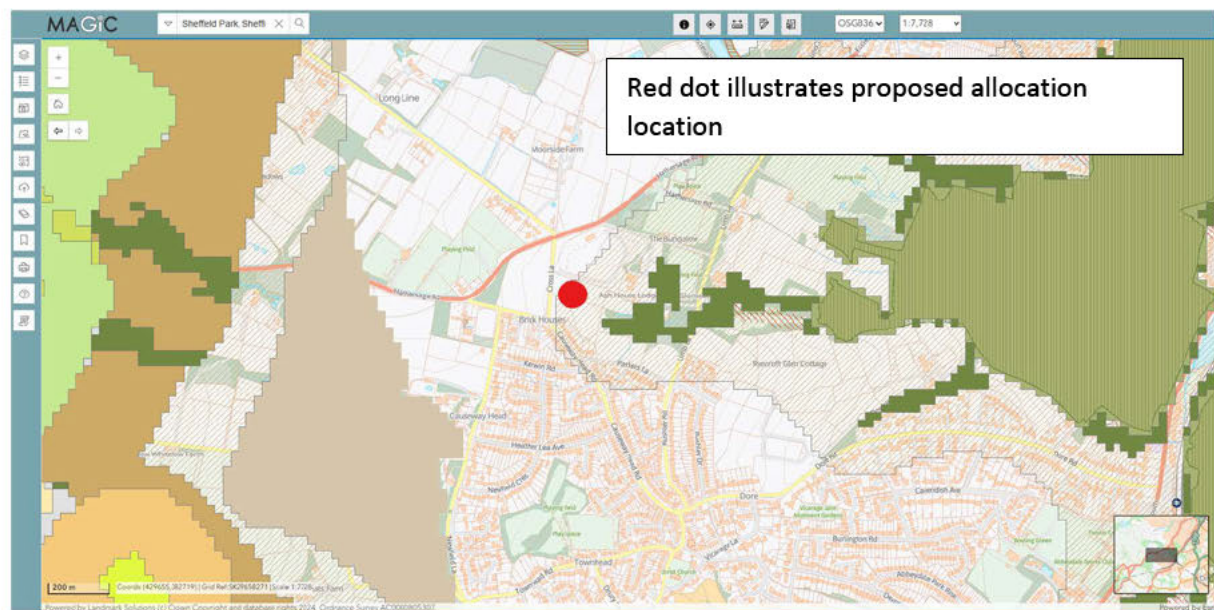
Green Belt: The site would form a finger of development extending from Dore and represent sprawl into open fields which appear as open countryside. Whilst Dore appears as a separate village when approached from the Peak District direction and Hathersage Road, the [ONS web map for 'Built Up Areas'](#)¹⁸ clearly shows what is appreciated when approaching from Abbeydale Road and then Totley via Dore Road, Bushy Wood Road and Furniss Avenue, namely that Dore is part of the large built up area of Sheffield.



Whilst Dore Village Society rightly highlight Dore's unique and special genius loci and its distinctiveness from other 'places', spatially and when approached from Totley the village of Dore is now a continuation of the sprawl of Sheffield's large built up area. As such the proposal would appear as a finger of sprawl harmful to purpose (a) of the Green Belt, starting to reach northwards towards Hathersage Road. It's development would represent a willingness of the LPA to relax Green Belt which raises concerns about the possibility of the LPA accepting further development to the north in terms of effect on the purposes of Green Belt.

Wildlife Designations: The site adjoins the Eccleshall Wood Local Wildlife Site and the evidence of the SRWT and local residents on its wildlife value should be carefully considered in respect of the adequacy of otherwise of the 6m minimum buffer proposed in the consultation documents allocations policy. The charity is concerned that whilst a buffer may be achieved in terms of layout, there is in this particular case a need for details of physical, administrative and legal controls to prevent planning creep and the use of the buffer area for recreation.

Nature Recovery: The site is identified on the Natural England Nature Recovery Network map as a Network Enhancement Zone 2. The land would make a logical and significant extension of the Core Habitat Network to the east. The evidence of the SRWT should be carefully considered in respect of the priority of the land for nature recovery, as the land could make the nearby wildlife site bigger and better, representing an extension of the wildlife corridor containing a watercourse running into Eccleshall Woods. The development would 'snip' off a corridor of open land and the opportunity afforded for a bigger better and more connected ecological network that is more resilient to climate change would be harmed.



Green Infrastructure and Public Rights of Way: The site has no public access but does envelope a watercourse and should be considered a priority for natural flood risk management and nature recovery.

Landscape Character and Green Belt Capacity Score: The site is identified as having a low capacity to accommodate change in respect of landscape character in the Sheffield Landscape Character and Green Belt Capacity Study. The study claims that there is medium scope to mitigate the effect of the development (a score of 2 in the assessment form on page 161 of the Study), yet this it is doubtful that mitigation would be effective in terms of local views and experience of the space as countryside especially from the surrounding views on public highways, with its intrinsic character and beauty as open countryside likely to be lost through suburbanisation as opposed to being enhanced.

Accessibility to Services and Facilities and Public Transport: The site is close to bus stops but these do not have a high frequency of service. The site is over 800m from the primary school, GP's, village centre and Co-op store and is not well located as a result.

Suggested policy criteria should the site be allocated

The necessary measures to protect the Local Wildlife Site should be specified in more detail.

A 'soft edge' to the sites 'interface' with the open fields and Parkers Lane should be specified for.

The allocation policy should specify what accessibility, service and infrastructure improvements will be required to make the site sustainable and well located with regard to Table 1 in the SYSTRA Sheffield Local Plan Transport Assessment: Interim Report on Public Transport and Active Travel Impacts and Potential Mitigation (page 11) and this should not be left to a later planning application process.

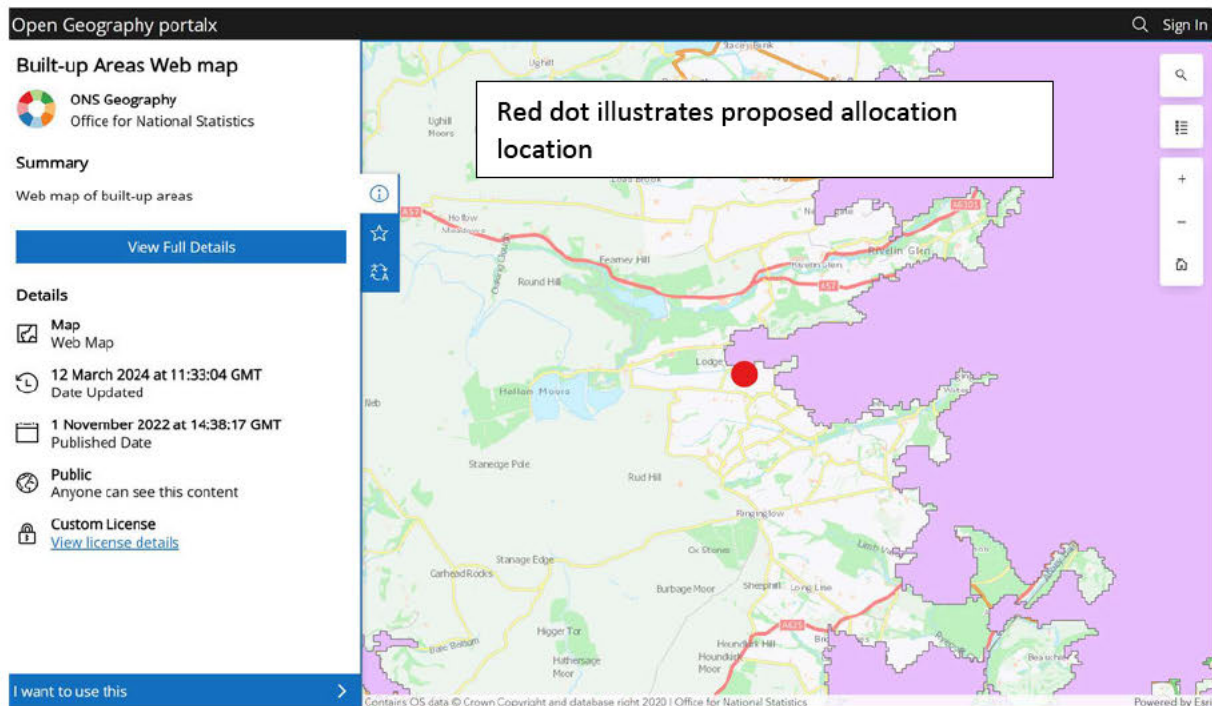
SCC should heed the advice of the SRWT and seek to understand in detail adequate buffers to the habitat present and if these are achievable and this should not be left to a later planning application process.

A landscaping framework should be set out now and the key aims of it should be set out in the allocation policy and this should not be left to a later planning application process. This is necessary in order to ascertain how much mitigation can be achieved or not and the associated implications for impact and capacity.

Highway infrastructure improvements should be detailed in the allocation policy based on an understanding of the likely impacts of the development of the site. This will allow the impact of the development to be adequately understood, alongside its deliverability or developability.

Land between Lodge Moor Road and Redmires Conduit (Housing) - SCC Site Ref: SWS18

Green Belt: The site would extend the existing sprawl of the large built up area into open fields which appear as open countryside. The [ONS web map for 'Built Up Areas'](#)¹⁹ clearly shows what is appreciated when approaching the site from Sheffield namely that Fulwood is well merged into the large built up area of Sheffield in spatial and visual terms.



As such the proposal would appear as a finger of sprawl harmful to purpose (a) of the Green Belt, starting to reach southwards into open countryside. It's development represents a willingness of the LPA to relax Green Belt which raises concerns for the future and the possibility that the LPA accept further development to the south in terms of effect on the purposes of Green Belt.

Wildlife Designations: The site allocation runs along the Redmires Conduit Local Wildlife Site. There is potential for the minimum buffer to the Local Wildlife Site to be inadequate and there should be a site specific assessment of the mitigation needed for this core habitat.

Nature Recovery: The land either side of the Redmires Conduit represents an opportunity to enhance the habitat corridors size and diversity and any development should ensure that this is achieved in line with NPPF aims.

Green Infrastructure and Public Rights of Way: The Redmires Conduit public footpath is a distinctive and well used route for residents wishing to walk to the Peak District and Redmires reservoirs. The proposal will increase the time taken for those using the route to feel like they are out of suburbia, fundamentally harming the valued character of the footpaths countryside setting.

¹⁹ [Built-up Areas Web map | Open Geography Portal](#)

Landscape Character and Green Belt Capacity Score: The site is identified as having a low capacity to accommodate change in respect of landscape character in the Sheffield Landscape Character and Green Belt Capacity Study and the development would prevent views from the public highway of the wider landscape and also impinge on views along the conduit towards the Peak District. The site assessment and Landscape Character and Green Belt Capacity Assessment do not appear to explicitly factor in the effect on the setting of the Peak District National Park and views from the Peak District towards the site and vice versa.

Accessibility to Services and Facilities and Public Transport: The site has a large part which is over 800m from the bus stops on Redmires Road which is served by a relatively high frequency bus route. Whilst the site is close to a GP's and a play area it is over 800m from a primary school and a convenience store and arguably is therefore not well located.

Suggested policy criteria should the site be allocated

The allocation policy should specify what accessibility, service and infrastructure improvements will be required to make the site sustainable and well located with regard to Table 1 in the SYSTRA Sheffield Local Plan Transport Assessment: Interim Report on Public Transport and Active Travel Impacts and Potential Mitigation (page 11) and this should not be left to a later planning application process.

SCC should heed the advice of the SRWT and seek to understand in detail adequate buffers to the habitat present and if these are achievable and this should not be left to a later planning application process.

A landscaping framework should be set out now and the key aims of it should be set out in the allocation policy and this should not be left to a later planning application process. This is necessary in order to ascertain how much mitigation can be achieved or not and the associated implications for impact and capacity.

Highway infrastructure improvements should be detailed in the allocation policy based on an understanding of the likely impacts of the development of the site. This will allow the impact of the development to be adequately understood, alongside its deliverability or developability.

