

# **Consultation Submission on the Sheffield Plan: Proposed Additional Site Allocations – Towards a Sustainable and Equitable Future for Sheffield**

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## **I. Introduction**

### **A. Purpose of the Submission**

This document constitutes a formal representation submitted in response to the Sheffield City Council's public consultation on the "Sheffield Plan - Proposed Additional Site Allocations," as detailed on the Council's "Have Your Say" portal.<sup>1</sup> The objective of this submission is to contribute constructively to the formulation of a Local Plan for Sheffield that is sound, effective, and equitable, addressing the city's housing needs while safeguarding its environmental assets and respecting the well-being of its diverse communities.

### **B. Acknowledgement of Sheffield's Housing Needs and General Support for a New Local Plan**

There is a clear and pressing need for a new, comprehensive Local Plan for Sheffield. The city's current planning framework is significantly outdated, with the last plan dating back to 2009 and based on documents from 1998.<sup>3</sup> This submission acknowledges this urgency and expresses general support for the principle underpinning the new Sheffield Plan: to address the city's demonstrable and serious housing shortage.<sup>4</sup> The development of a robust Local Plan is crucial not only for meeting housing targets but also for ensuring that future development is managed strategically and sustainably. An outdated plan, as noted by Councillor Douglas Johnson, Chairman of the Housing Committee, "leaves lots of loopholes open for developers to exploit" and could ultimately lead to the imposition of a government-set plan, which "would be much worse for the city".<sup>3</sup> Therefore, the creation of a new, well-considered Local Plan is a vital step in Sheffield charting its own course for future development. This support, however, is contingent upon the final plan being genuinely sustainable, equitable in its distribution of development, and truly reflective of both community needs and critical environmental constraints.

### **C. Overview of Key Concerns and Proposals**

While supporting the overarching goal of addressing Sheffield's housing crisis, this submission raises significant concerns regarding certain aspects of the "Proposed Additional Site Allocations." These concerns, and the corresponding proposals, are central to achieving a Local Plan that is both effective and fair. The primary points addressed herein include:

- An objection to the unbalanced geographical distribution of the proposed additional Green Belt allocations, which appear to concentrate development disproportionately in certain areas of the city.
- A specific and detailed objection to the proposed allocation of site SES30 (Land between Bramley Lane and Beaver Hill Road, S13 7JH) for large-scale development, based on its community value, existing local pressures, and environmental sensitivities.
- Formal proposals for rebalancing the Green Belt allocations across the city to achieve a more equitable distribution of new housing development.
- A formal proposal for the removal of site SES30 from the Sheffield Plan.

These points are substantiated by evidence drawn from the Council's own documentation, independent research, and established planning principles concerning housing need, the impacts of unbalanced urban development, and the cumulative consequences of overdevelopment on communities and the environment. This submission itself is an integral part of the formal consultation process, a process designed to ensure the Local Plan is "justified" and "effective," and based on "evidence of participation of the local community and others having a stake in the area".<sup>2</sup> It is in this spirit of constructive engagement that these representations are made.

## **II. The Critical Need for Housing in Sheffield: Supporting the Local Plan's Intent**

### **A. Evidence of Sheffield's Acute Housing Shortage**

The imperative for a new Local Plan is underscored by Sheffield's acute housing shortage. Statistical evidence paints a stark picture of unmet need. By 2022, Sheffield had an estimated requirement for 370,099 new homes, facing a deficit of 116,362 properties.<sup>4</sup> This gap is compounded by ongoing shortfalls in delivery; a deficit of 857 units over the past two years has increased the immediate shortfall to 11,057 homes, against a projected need of 11,610 homes over the next five years.<sup>4</sup> The human impact of this shortage is reflected in the 13,662 households registered on the social housing waiting list in 2023.<sup>5</sup>

The Sheffield City Council's Housing Strategy aims to deliver 35,000 new homes by 2039.<sup>4</sup> However, following examination, Planning Inspectors have recommended that the housing requirement should be increased to 38,012 additional new homes over the period 2022 to 2039 to meet identified needs.<sup>7</sup> This revised target further emphasizes the scale of the challenge.

The housing crisis is not a monolithic issue; it disproportionately affects those in greatest need of affordable and social housing. While overall housing targets are significant, the failure to deliver an adequate supply of *social* homes is a particularly critical dimension of the crisis. Current plans aim to build or acquire just 202 new social homes per year over the next five years, whereas Shelter estimates a need for around 900 affordable homes annually to compensate for deficits in private sector housebuilding.<sup>5</sup> This disparity highlights a crucial aspect of Sheffield's housing challenge that the Local Plan must address with targeted solutions, moving beyond simple overall supply numbers.

### **B. Socio-Economic Impacts of the Housing Shortage**

The chronic undersupply of housing has had predictable and severe socio-economic consequences for the residents of Sheffield. Property prices have risen sharply, with the average house price reaching £222,000 in March 2025, an increase of 8.3% from March 2024. For first-time buyers, the situation is particularly challenging, with the average price paid climbing to £196,000 in March 2025, a 9.1% increase over the previous year.<sup>8</sup>

Rental rates have also surged. The average private rent in Sheffield stood at £882 per month in April 2025, representing an annual increase of 5.7%.<sup>8</sup> More strikingly, private rents in the city increased by a significant 25.6% between November 2021 and November 2024.<sup>9</sup> This rapid escalation in housing costs has a direct impact on affordability. The average house price in Sheffield is now six times the median household income, placing homeownership beyond the reach of many and increasing financial pressure on renters.<sup>6</sup>

The consequences of this affordability crisis are far-reaching, contributing to rising homelessness. In December 2023, 672 households in Sheffield, including 422 children, were

living in temporary accommodation.<sup>5</sup> Furthermore, there were 3,883 homelessness presentations recorded in the 2023/24 period.<sup>6</sup> These figures illustrate the profound social cost of the housing shortage.

The city's population growth, partly driven by an influx of students and professionals, places additional pressure on the housing market.<sup>4</sup> While this growth can bring economic benefits, the nature of some of this demand, particularly for student accommodation which is often difficult to convert to other housing forms, presents a structural challenge.<sup>5</sup> This suggests that the housing market requires nuanced solutions that consider the specific types and tenures of housing needed, rather than solely focusing on overall supply figures.

### C. The Local Plan's Role in Addressing the Crisis

The Sheffield Plan, with its objective to deliver 38,012 additional homes by 2039<sup>7</sup>, is acknowledged as a necessary strategic response to this well-documented crisis. The Council has stated that the need to release Green Belt land, as proposed in the additional site allocations, is predicated on the exhaustion of available brownfield sites.<sup>3</sup> If brownfield land capacity has indeed been maximized, the decisions regarding which Green Belt sites are released, and the equity of that distribution, become matters of paramount importance. This submission supports the intent of the Local Plan to increase housing supply but argues that this must be achieved in a manner that is balanced, sustainable, and fair to all communities within Sheffield.

**Table 1: Sheffield's Housing Need Indicators**

Indicator	Data / Figure	Source(s)
Estimated Housing Deficit (by 2022)	116,362 properties	<sup>4</sup>
Households on Social Housing Waiting List (2023)	13,662	<sup>5</sup>
Revised Housing Requirement (2022-2039)	38,012 additional homes	<sup>7</sup>
Current Housing Supply Shortfall vs Revised Target	3,539 dwellings	<sup>7</sup>
Average House Price (Mar 2025) & YoY Increase	£222,000 (+8.3%)	<sup>8</sup>
Average First-Time Buyer Price (Mar 2025) & YoY Inc.	£196,000 (+9.1%)	<sup>8</sup>
Average Private Rent (Apr 2025) & YoY Increase	£882 (+5.7%)	<sup>8</sup>

Private Rent Increase (Nov 2021 - Nov 2024)	25.6%	9
Affordability Ratio (House Price to Median Income)	6x	6
Households in Temporary Accommodation (Dec 2023)	672 (including 422 children)	5
Homelessness Presentations (2023/24)	3,883	6

This table consolidates key metrics, providing a clear summary of Sheffield's housing crisis, thereby underscoring the necessity of the Local Plan while simultaneously highlighting the critical need for its provisions to be effective, equitable, and responsive to the multifaceted nature of the challenge.

### **III. Objection to the Unbalanced Distribution of Proposed Additional Green Belt Allocations**

#### **A. Analysis of the Proposed Geographical Spread**

A primary concern regarding the "Proposed Additional Site Allocations" is the apparent imbalance in the geographical distribution of sites proposed for release from the Green Belt. Evidence indicates a significant concentration of these allocations in the south-east, particularly the S13 postcode area (Handsworth), and the north-east of Sheffield.<sup>3</sup> Notably, the Handsworth area (S13) is designated to accommodate over 40% of the new housing allocated on Green Belt land.<sup>3</sup> While it has been reported that nine of the fourteen Green Belt sites are in the north of the city, comprising slightly less than half of the total land area proposed for release<sup>11</sup>, this still points to a considerable development focus in the northern and eastern sectors.

This concentration contrasts sharply with the relative paucity of Green Belt releases proposed for the wealthier western parts of the city. The Council's own "Housing Strategy Evidence Base" highlights a clear spatial divide, with the west characterized by higher property and rental values, and generally higher levels of neighbourhood satisfaction, compared to the more deprived east.<sup>4</sup> This existing disparity makes the current pattern of proposed Green Belt development particularly concerning.

#### **B. The Detrimental Effects of Unbalanced Urban Development**

The proposed concentration of development carries substantial risks, as documented by research into the negative impacts of unbalanced urban growth. Such development patterns can lead to increased inequality, foster social exclusion, and create uneven access to essential services and opportunities for residents in different parts of the city.<sup>12</sup> When urbanization is poorly planned or imbalanced, it can manifest in increased traffic congestion, higher crime rates, environmental pollution, and deeper social divides.<sup>13</sup>

Sheffield already exhibits a "marked contrast between the wealthier west and the more deprived east," reflecting an uneven distribution of housing inequality.<sup>4</sup> Concentrating new development, especially on Green Belt land, in areas that may already face socio-economic challenges or infrastructure deficits, risks perpetuating or even worsening these existing spatial divides. This

approach can place an unsustainable strain on existing local infrastructure – including schools, healthcare facilities, and transport networks – disproportionately affecting established communities in those areas.<sup>15</sup> The Council's "Housing Strategy Evidence Base" indicates that social housing is already predominantly located in the North East, South East, and the Manor, Arbourthorne, and Gleadless areas.<sup>6</sup> Directing a large proportion of new Green Belt development towards these same quadrants, without a corresponding commitment to development in other parts of the city, particularly the west, raises serious questions about the commitment to fostering genuinely mixed and balanced communities and avoiding the concentration of deprivation.

### C. The Principle of Fair Share and Equitable Development

A fundamental principle of sound urban planning is that the burdens and benefits of new development should be distributed equitably across a city. This is particularly pertinent when considering the release of Green Belt land, which is often viewed as a measure of last resort to meet pressing housing needs. The National Planning Policy Framework (NPPF) itself outlines overarching objectives for sustainable development. These include social objectives aimed at supporting "strong, vibrant and healthy communities" and ensuring that "a sufficient number and range of homes can be provided to meet the needs of present and future generations".<sup>17</sup> Implicit in these objectives is the need for a balanced and fair distribution of housing development to achieve these outcomes across the entire local authority area.

Urban planning best practice also advocates for the creation of mixed-use, diverse communities with equitable access to amenities and green spaces for all residents.<sup>18</sup> A Local Plan that concentrates development in specific areas, while leaving others relatively untouched, may fail to achieve these broader social and environmental goals. The justification for Green Belt release rests on "exceptional circumstances" arising from unmet housing need.<sup>7</sup> However, if this release is not perceived to be distributed fairly, and if certain areas appear to bear a disproportionate share of this development compared to others with similar Green Belt characteristics but less development pressure, the legitimacy of the "exceptional circumstances" argument could be undermined in those specific locales. This highlights the critical link between the policy justification for Green Belt release and the practical, ethical considerations that must inform site selection to ensure public acceptance and the overall soundness of the plan.

**Table 2: Geographical Distribution of Proposed Additional Green Belt Housing Sites**

Site Reference (if available)	General Location/Postcode Area	Proposed Housing Capacity (approx.)	Key Area of Concentration
SES30 (S02502/S03020)	Handsworth (S13) - South East	868	South East
(Site near Creswick Ave)	Grenoside (North East/S35)	609	North East

Handsworth Hall Farm	Handsworth (S13) - South East	870	South East
(East of Chapeltown Rd)	Chapeltown (North/S35)	549	North
(South of White Lane)	Gleadless (South East)	304	South East
(Lodge Moor Rd/Redmires)	Lodge Moor (West)	258	West
Holme Lane Farm/Grenoside	Grenoside (North/S35)	188	North
<i>Other Northern Sites (various)</i>	<i>North/North East (e.g. S35)</i>	<i>Varies</i>	<i>North/North East</i>
<i>Other South Eastern Sites</i>	<i>South East (e.g. S13)</i>	<i>Varies</i>	<i>South East</i>
<b>Total (approx. from 14 sites)</b>		<b>~3,539</b>	

*Note: This table is illustrative based on available information.<sup>3</sup> A comprehensive list with precise capacities for all 14 sites should be referenced from the full Sheffield Plan documentation. The table aims to demonstrate the concentration in S13 and S35 areas.*

This table starkly illustrates the concentration of proposed Green Belt development, particularly in the South East (S13) and North/North East (S35), providing concrete evidence for the argument against the current unbalanced distribution.

#### **IV. Specific Objection: The Proposed Allocation of Site SES30 (Land between Bramley Lane and Beaver Hill Road, S13 7JH)**

This submission lodges a strong and specific objection to the proposed allocation of site SES30, identified as "Land between Bramley Lane and Beaver Hill Road" in the S13 7JH postcode area, for major development. This objection is founded upon the site's intrinsic community and environmental value, the existing pressures from past development in the Handsworth/Woodhouse area, and the severe negative impacts anticipated from a development of the proposed scale.

##### **A. Site Context and Community Value**

Site SES30 is a substantial area of land, described as council-owned farmland <sup>11</sup>, and currently utilized for agriculture.<sup>22</sup> More significantly, it is a highly valued local green area. Descriptions from local sources paint a picture of "lush green grass" and "small coppices of trees".<sup>11</sup> This land is not merely an abstract green space; it is actively and extensively used by local residents for recreation, including walking, and is cherished as an accessible natural amenity.<sup>11</sup> Residents have explicitly stated that having such green space "on your doorstep" is a key reason for choosing to live in the area.<sup>11</sup> The presence of established recreational footpaths further underscores its importance to the local community.<sup>11</sup> The loss of such a significant and well-used green space would represent a profound detriment to local character and the well-being of the community it serves.

### **B. Concerns Regarding Past Overdevelopment in Handsworth/Woodhouse (S13)**

The community of Handsworth and Woodhouse (S13) has a history of absorbing significant development, contributing to a perception among residents that the area has already "taken more than its fair share of new development in recent years".<sup>11</sup> Woodhouse, originally a farming and coal-mining village, has undergone considerable expansion and redevelopment over decades, including major demolitions in the 1960s to make way for new housing estates.<sup>23</sup> The "Badger estate," for instance, was constructed in the 1960s as a purportedly "temporary" solution to housing shortages but remains a permanent feature of the landscape.<sup>23</sup> While the nearby "massive Waverley estate" technically falls within Rotherham's boundary, its sheer scale and proximity contribute to the cumulative sense of development pressure experienced by communities in the S13 vicinity.<sup>11</sup> This historical context of continuous change and absorption of new housing creates a heightened sensitivity to further large-scale development proposals and fuels anxieties about the erosion of remaining green spaces and local character.

### **C. Anticipated Negative Impacts of Developing SES30**

The proposed development on site SES30 is extensive, encompassing 868 homes, a mainstream secondary school, and a multi-faith burial site.<sup>21</sup> Such a multifaceted and large-scale project will inevitably generate a range of significant and detrimental impacts on the local area and its residents.

#### **1. Increased Traffic Congestion and Air Pollution:**

The introduction of approximately 868 new dwellings, alongside a secondary school and a burial site, will inevitably lead to a substantial increase in vehicular traffic on local roads, including Bramley Lane, Beaver Hill Road, and the surrounding network. This concern is a common consequence of large new developments.<sup>24</sup> Sheffield's ambient air quality is already described as "moderately polluted," with levels that can exceed World Health Organization (WHO) guidelines.<sup>25</sup> Vehicle emissions are recognized as significant contributors to nitrogen oxide (NOx) and particulate matter (PM) pollution in UK urban areas.<sup>27</sup> Research indicates that the highest NO<sub>2</sub> concentrations are typically recorded in streets characterized by dense building blocks and heavy traffic, particularly around traffic lights <sup>29</sup> – conditions likely to be exacerbated by the SES30 development. The resultant increase in traffic will not only cause significant congestion and delays for existing residents but will also worsen local air quality, posing risks to public health.

#### **2. Strain on Local Infrastructure:**

The existing infrastructure in the S13 area is already under pressure, and the addition of a development of this magnitude will stretch services beyond acceptable limits.

- **Schools:** Handsworth Grange Community Sports College, serving the area, has a current enrolment of 1000 pupils against an official capacity of 1025<sup>30</sup>, indicating it is operating near its limit. While the proposal for SES30 includes a new secondary school<sup>21</sup>, this does not address the immediate and cumulative impact on primary school places, nor the transitional period before such a new school becomes operational. Furthermore, other schools in the wider S13/Birley area, such as Birley Academy and Birley Spa Primary Academy, currently hold "Requires Improvement" Ofsted ratings, suggesting existing educational challenges in the locality that could be compounded by rapid population growth.<sup>31</sup>
- **GP Services:** Access to primary healthcare is a significant concern. Patient survey data for Handsworth Medical Practice (C88036) reveals that only 32% of patients find it easy to get through to the practice by phone (compared to a 46% local Integrated Care System (ICS) average and 50% national average). Critically, only 9% of patients usually get to see or speak to their preferred healthcare professional when they would like to, a figure starkly lower than the 39% local (ICS) average and 40% national average.<sup>32</sup> Woodhouse Health Centre also serves this community.<sup>33</sup> The influx of residents from nearly 900 new homes will place an unsustainable additional burden on these already stretched GP services, potentially leading to longer waiting times and reduced access to care.
- **Other Amenities:** The development will also inevitably strain other local amenities, including shops, community facilities, and public transport services, diminishing the quality of life for existing residents.

### 3. Loss of Local Green Space and Biodiversity:

The development of SES30 would result in the irreversible loss of a substantial, accessible, and highly valued local green space. As detailed previously, this land provides crucial recreational opportunities for the community and contributes significantly to local identity and well-being.<sup>11</sup> Its loss would be a severe blow to the local environment. Beyond its amenity value, the site, currently agricultural land with features such as coppices and hedgerows<sup>11</sup>, supports local biodiversity. While the overarching Sheffield Plan may refer to achieving "biodiversity net gain"<sup>34</sup>, the specific measures for a site of this scale and nature would need to be exceptionally robust to compensate for the habitat loss. Sheffield is renowned as one of the greenest cities in the country<sup>35</sup>, and the removal of such a large tract of greenfield land would locally diminish this valued characteristic.

### 4. Potential Flood Risk:

The Level 2 Strategic Flood Risk Assessment (SFRA) for site S03020 (coterminous with SES30) indicates that the site is entirely located within Flood Zone 1, signifying a low risk of flooding from rivers. However, the assessment also notes that Shirtcliff Brook, an unmodelled watercourse, runs close to the southern boundary of the site.<sup>22</sup> The proposed development includes a significant impermeable area of approximately 24 hectares.<sup>22</sup> This large impermeable surface, coupled with the proximity of an unmodelled brook, creates a nuanced flood risk. While direct fluvial flooding of the development itself may be low, the increased surface water runoff from such a large impermeable area could exacerbate localised flooding issues



downstream or in adjacent areas, a critical environmental consideration that requires thorough mitigation strategies.

The council's ownership of the land at SES30 <sup>11</sup>, while not precluding its development, does introduce a dimension that warrants careful consideration. It is essential that the decision to allocate this site is based unequivocally on sound planning principles and a comprehensive assessment of its merits and impacts, rather than being influenced, or perceived to be influenced, by land ownership. Given the strength of community attachment and the multifaceted concerns outlined, the planning justification for developing this particular site must be exceptionally compelling.

**Table 3: Summary of Objections to Site SES30 Allocation**

<b>Concern</b>	<b>Specific Evidence / Data Point</b>	<b>Source(s)</b>	<b>Implication</b>
<b>Loss of Valued Green Space &amp; Amenity</b>	Council-owned farmland, "lush green grass," "small coppices". <sup>11</sup> Extensively used for recreation; "lovely to have this on your doorstep". <sup>11</sup>	<sup>11</sup>	Detrimental to community well-being, loss of local character, reduced access to nature.
<b>Past Overdevelopment &amp; Community Fatigue</b>	S13 has "taken more than its fair share". <sup>11</sup> History of 1960s redevelopment, "Badger estate". <sup>23</sup> Proximity to Waverley estate adds to perception of pressure. <sup>11</sup>	<sup>11</sup>	Increased community resistance, perception of unfair burden, erosion of local identity.
<b>Increased Traffic Congestion</b>	868 homes + secondary school + burial site <sup>21</sup> will generate significant new traffic on Bramley Lane, Beaver Hill Rd.	<sup>21</sup>	Severe local congestion, delays, reduced road safety, negative impact on daily life for existing residents.
<b>Worsened Air Pollution</b>	Sheffield air "moderately polluted". <sup>25</sup> Vehicle emissions are major contributors. <sup>27</sup> High NO <sub>2</sub> with dense traffic. <sup>29</sup>	<sup>25</sup>	Exacerbation of local air pollution, increased health risks (respiratory, cardiovascular) for

			residents, especially vulnerable groups.
<b>Strain on School Places</b>	Handsworth Grange CS College (1000 pupils, capacity 1025) near full. <sup>30</sup> Other local schools "Require Improvement". <sup>31</sup> New secondary school on site doesn't address primary needs.	21	Overcrowding in existing schools, potential decline in education quality, pressure on primary school provision.
<b>Strain on GP Services</b>	Handsworth Medical Practice: Difficult phone access (32% easy vs 46% local avg); only 9% see preferred GP (vs 39% local avg). <sup>32</sup>	32	Increased difficulty accessing primary healthcare, longer waiting times, reduced continuity of care, greater pressure on NHS resources.
<b>Loss of Biodiversity</b>	Loss of agricultural land, hedgerows, coppices. <sup>11</sup>	11	Reduction in local wildlife habitats, impact on ecological networks, diminishes Sheffield's green character locally.
<b>Potential Flood Risk (Surface Water)</b>	Site in Flood Zone 1, but Shirtcliff Brook (unmodelled) close to southern boundary; 24ha proposed impermeable area. <sup>22</sup>	22	Increased risk of surface water runoff, potential for localised flooding downstream or adjacent to site, pressure on drainage systems.
<b>Cumulative Impact of Multi-Functional Site</b>	Proposal includes 868 homes, a secondary school, and a multi-faith burial site. <sup>21</sup>	21	Synergistic negative impacts greater than housing alone (traffic, land take, infrastructure demand).

This table systematically outlines the compelling reasons for objecting to the allocation of site SES30, each supported by specific evidence, demonstrating that the cumulative negative impacts of this proposal would be severe and detrimental to the local community and environment.

## **V. Formal Proposals for a Revised Sheffield Local Plan**

In light of the significant concerns detailed above regarding the unbalanced distribution of proposed Green Belt allocations and the specific unsuitability of site SES30, this submission puts forward two formal proposals for consideration by Sheffield City Council. These proposals aim to foster a Local Plan that is more equitable, sustainable, and responsive to the needs and characteristics of all Sheffield's communities.

### **A. Proposal 1: To Rebalance Green Belt Allocations for New Housing**

It is proposed that Sheffield City Council revises its strategy for Green Belt release to achieve a more balanced and equitable distribution of new housing development across the city. This involves two key actions:

#### **1. Reduce Allocations in the East and North-East:**

A significant reduction is proposed in the quantum of Green Belt land allocated for development in the eastern and north-eastern sectors of the city, particularly within the S13 postcode (Handsworth/Woodhouse) and other areas identified as bearing a disproportionate share of the proposed new Green Belt housing. This is justified by:

- The current over-concentration of proposed sites in these areas, as evidenced in Section III.A and Table 2.<sup>3</sup>
- The existing and anticipated cumulative pressures on local infrastructure (schools, GP services, transport networks) in these communities, as detailed for site SES30 and applicable more broadly.
- The fundamental planning principle of equitable development, ensuring that no single part of the city is asked to absorb an unfair proportion of new growth, especially on sensitive Green Belt land.

#### **2. Strategically Consider Suitable Allocations in the West of the City:**

Concurrently, it is proposed that the Council undertakes a proactive and robust assessment to identify and allocate suitable Green Belt sites for housing development in the western parts of Sheffield. Historically, these areas have seen less Green Belt release despite often having higher property values and, in some locales, potentially greater capacity within existing infrastructure or a stronger economic base to support necessary upgrades.<sup>4</sup> Such an approach would:

- Contribute to creating more balanced and mixed communities across the city.
- Distribute the environmental and social impacts of new housing development more fairly.
- Align with the National Planning Policy Framework's (NPPF) objective to promote sustainable patterns of development that meet identified needs across the whole local authority area.<sup>17</sup>

- Potentially yield greater financial contributions from development in higher-value western areas. These funds (e.g., through Section 106 agreements or the Community Infrastructure Levy) could then be strategically reinvested in infrastructure improvements city-wide, including in areas with greater existing need.

This proposal does not advocate for indiscriminate development in the west but calls for a transparent and evidence-based assessment of potential sites, considering their specific environmental sensitivities, accessibility, infrastructure requirements, and the potential for sustainable integration with existing communities.

### **B. Proposal 2: To Remove Site SES30 (Land between Bramley Lane and Beaver Hill Road, S13 7JH) from the Plan**

A formal request is made for the complete removal of site SES30 (Land between Bramley Lane and Beaver Hill Road, S13 7JH) from the Sheffield Plan's list of proposed allocations. This proposal is based on the comprehensive objections detailed in Section IV and summarized in Table 3. The primary justifications for its removal are:

- **Severe Cumulative Impact:** The sheer scale of the proposed development on SES30 – 868 homes, a secondary school, and a burial site <sup>21</sup> – on this single parcel of land, situated within a community that has already experienced significant development pressure <sup>11</sup>, would result in unacceptable and severe cumulative negative impacts on local infrastructure, traffic, air quality, and overall amenity.
- **Irreplaceable Loss of Community Value:** The site's established and cherished recreational use by local residents, its contribution to local character, and its function as an accessible green lung for the community are of significant intrinsic value.<sup>11</sup> Its loss would be a profound and irreversible detriment to the well-being of the Handsworth/Woodhouse community.
- **Exacerbation of Existing Infrastructure Deficits:** The current documented pressures on local schools and GP services in the S13 area <sup>30</sup> would be unacceptably intensified by the population increase associated with this development, undermining the quality and accessibility of these essential public services.
- **Significant Environmental Concerns:** The potential for increased surface water flood risk due to the large impermeable area and proximity to Shirtcliff Brook <sup>22</sup>, coupled with the loss of biodiversity associated with developing this extensive greenfield site, raises serious environmental objections.
- **Availability of More Suitable Alternatives through Rebalancing:** If the Council adopts Proposal 1 (to rebalance Green Belt allocations), the imperative to develop such a large, sensitive, and contentious site as SES30 would be significantly diminished. A more equitable city-wide distribution strategy should prioritize sites with fewer negative impacts and greater potential for sustainable integration.

The removal of allocated sites from Local Plans can be justified on several grounds, including emerging evidence of constraints (such as flood risk or infrastructure limitations becoming more apparent) or if a site no longer aligns with a revised and more sustainable spatial strategy.<sup>36</sup> The evidence presented against SES30 aligns with these justifications.

Presenting these two proposals – the rebalancing of Green Belt allocations and the removal of site SES30 – in tandem offers a constructive path forward. It demonstrates a commitment to Sheffield meeting its housing needs but insists that this must be achieved in a way that is strategically sound, environmentally responsible, and socially equitable. This approach seeks a *better overall plan* for Sheffield, rather than simply opposing development in one location, and aligns with the planning principle of identifying "credible alternatives to meeting identified need" when challenging specific allocations.<sup>36</sup> These proposals are put forward to assist the Council in developing a Local Plan that is truly "positively prepared," "justified," "effective," and "consistent with national policy," in line with the Council's own stated criteria for a sound plan.<sup>2</sup>

## **VI. The Wider Implications of Development Strategy: Ensuring Sustainable and Equitable Communities**

The decisions made within the Sheffield Local Plan regarding site allocations, particularly the use of Green Belt land, have implications that extend far beyond the boundaries of individual development sites. They reflect a broader strategy for the city's growth and will shape the character and sustainability of its communities for decades to come.

### **A. The Consequences of Decades of Overdevelopment and Concentrated Development**

The experience of communities like Handsworth/Woodhouse, which have seen repeated phases of development over many years<sup>11</sup>, highlights a common challenge in urban planning. When new development is consistently concentrated in specific areas, often without commensurate and timely investment in supporting infrastructure, it can lead to a degradation of the local environment, increased pressure on public services, community fatigue, and a pervasive sense among residents of being unfairly burdened or "left behind".<sup>11</sup> This pattern of development can exacerbate socio-spatial inequalities and contribute to environmental destruction if not carefully managed.<sup>15</sup> Housing insecurity, which can be intensified by unaffordable housing costs and poor living conditions in areas subjected to concentrated development or gentrification pressures, is known to have significant negative health and social consequences for affected populations.<sup>15</sup> The Local Plan must actively seek to avoid repeating or reinforcing such patterns.

### **B. The Importance of Strategic, City-Wide Planning for Infrastructure and Environmental Protection**

A Local Plan should be far more than a mere inventory of land parcels available for development. It must represent an integrated, strategic vision for sustainable growth across the entire city.<sup>7</sup> This necessitates proactive and comprehensive planning for all forms of infrastructure – including schools, healthcare facilities, transport networks, green infrastructure, and utilities – to ensure that new development is adequately supported, regardless of where it occurs. The National Planning Policy Framework (NPPF) places considerable emphasis on the need to align growth with infrastructure provision.<sup>17</sup> Furthermore, achieving well-designed places requires coordinated efforts across council departments, ensuring that every investment in the built environment is considered as a piece of urban design contributing to the whole, rather than an isolated project.<sup>19</sup> This holistic approach is essential if the Local Plan is to deliver genuinely sustainable communities.

### **C. Advocating for a Truly Plan-Led System**

The UK planning system is intended to be plan-led, meaning that decisions on development should be guided by an up-to-date, democratically adopted Local Plan. Such a system should ensure that development is genuinely sustainable and meets the identified needs of all communities, rather than being driven solely by developer interests or abstract national targets pursued in isolation.<sup>39</sup> Maintaining an up-to-date Local Plan is crucial for guiding development effectively and fairly, and for providing certainty to both communities and developers.<sup>39</sup>

Recent changes to national planning policy, including discussions around "Grey Belt" land<sup>39</sup>, may be influencing the Council's approach to Green Belt release. While these policies aim to facilitate housing delivery, it is critical that their application is carefully scrutinized at the local level. The definition and identification of "Grey Belt" must not become a mechanism for the indiscriminate release of Green Belt land that, despite potentially scoring lower against some strategic Green Belt purposes, still performs vital local functions in terms of amenity, recreation, biodiversity, or preventing urban sprawl between distinct communities. Sites like SES30, which are clearly valued and utilized by the local community, warrant a nuanced assessment that goes beyond broad-brush national categorizations.

Furthermore, the long-term failure to meet housing needs, particularly for affordable and social housing, creates a persistent pressure that makes the invocation of "exceptional circumstances" for Green Belt release more frequent. Addressing the root causes of this chronic undersupply – which may include issues such as land banking by developers, challenges with financial viability of schemes, insufficient public funding for social housing, and slow build-out rates on permitted sites<sup>15</sup> – is as crucial in the long term as the immediate task of site allocation. The Local Plan should, where possible, incorporate policies that tackle these systemic issues to reduce future reliance on Green Belt land. For instance, the observation that sites with a higher share of affordable housing tend to be built out more quickly<sup>41</sup> suggests that policies robustly promoting and enabling affordable housing delivery can also contribute to meeting overall housing targets more efficiently. The Local Plan, therefore, has an opportunity not only to allocate land but also to influence the pace and type of development to better address Sheffield's pressing needs.

## **VII. Conclusion and Call to Action**

### **A. Reiteration of Support for a *Sustainable and Balanced* Local Plan**

This submission reaffirms its initial support for Sheffield City Council's commitment to developing a new Local Plan to guide the city's future growth and address its significant housing needs. However, it is imperative that this plan is built upon robust principles of sustainability, comprehensive environmental protection, genuine social equity, and meaningful community engagement. A Local Plan that fails to achieve this balance risks undermining the very communities it purports to serve.

### **B. Urging Sheffield City Council to Amend the Plan**

Sheffield City Council is formally and respectfully requested to give full consideration to the evidence, arguments, and proposals presented within this submission. The Local Plan process is, by its nature, iterative, involving public consultation, scrutiny by Planning Inspectors, and opportunities for modification before final adoption.<sup>3</sup> This representation is offered as a constructive contribution to that process, aiming to assist the Council in refining the Sheffield Plan to better serve the long-term interests of all Sheffield's residents.

Specifically, Sheffield City Council is urged to:

1. **Commit to rebalancing the geographical distribution of additional Green Belt housing allocations.** This requires moving away from the current over-concentration of proposed sites in the eastern and north-eastern parts of the city. A revised strategy should ensure a more equitable city-wide approach, which includes a transparent and evidence-led assessment of suitable Green Belt sites in the western areas of Sheffield, alongside necessary infrastructure planning.
2. **Remove site SES30 (Land between Bramley Lane and Beaver Hill Road, S13 7JH) from the list of proposed allocations.** The significant adverse cumulative impacts of developing this site – on local infrastructure, traffic, air quality, community amenity, and the environment – combined with its high value as an accessible local green space, render it unsuitable for the scale and nature of development proposed.

This submission has demonstrated that there are substantial, evidence-based grounds for these amendments. Adopting these proposals would represent a significant step towards a Sheffield Local Plan that is not only compliant with national policy but is also demonstrably fairer, more sustainable, and more responsive to the expressed needs and values of its local communities.

We are willing to engage further with Sheffield City Council and its officers in a constructive dialogue to help develop a revised Local Plan that effectively addresses the city's housing requirements while ensuring a high quality of life and a healthy environment for all its citizens, both present and future.

## VIII. References

- <sup>1</sup> "Proposed Additional Site Allocations" Sheffield Local Plan PDF. URL: <https://haveyoursay.sheffield.gov.uk/sheffield-plan-proposed-additional-site-allocations>
- <sup>2</sup> Sheffield City Council planning documents green belt review. URL: [https://haveyoursay.sheffield.gov.uk/sheffield-plan-proposed-additional-site-allocations?tool=news\\_feed](https://haveyoursay.sheffield.gov.uk/sheffield-plan-proposed-additional-site-allocations?tool=news_feed)
- <sup>3</sup> Sheffield City Council minutes Handsworth S13 development concerns. URL: <https://www.bbc.com/news/articles/c2kqcx0kyv2o>
- <sup>4</sup> Sheffield housing crisis impact on property prices rents. URL: <https://www.housing-studies-association.org/articles/housing-policy-formation-in-sheffield>
- <sup>5</sup> 13,000 on the waiting list: We explore the scale of Sheffield's housing crisis. URL: <https://nowthenmagazine.com/articles/13000-on-the-waiting-list-we-explore-the-scale-of-sheffields-housing-crisis-shelter-renting-general-election>
- <sup>6</sup> Housing Strategy Evidence - Sheffield City Council. URL: [https://www.sheffield.gov.uk/sites/default/files/2024-12/housing\\_strategy\\_evidence\\_base\\_0.pdf](https://www.sheffield.gov.uk/sites/default/files/2024-12/housing_strategy_evidence_base_0.pdf)
- <sup>7</sup> "Proposed Additional Site Allocations" Sheffield Local Plan PDF. URL: <https://haveyoursay.sheffield.gov.uk/41788/widgets/124681/documents/84580>

- <sup>8</sup> Housing prices in Sheffield - Office for National Statistics. URL: <https://www.ons.gov.uk/visualisations/housingpriceslocal/E08000039/>
- <sup>9</sup> Private rents soared by 8% in Sheffield last year – but local politicians are divided over proposals to introduce caps. URL: <https://nowthenmagazine.com/articles/private-rent-soared-by-8-percent-in-sheffield-last-year-but-local-politicians-are-divided-over-proposals-to-introduce-caps>
- <sup>10</sup> Public consultation launches into latest Sheffield Local Plan proposals. URL: <https://www.sheffield.gov.uk/news/2025/public-consultation-launches-latest-sheffield-local-plan-proposals>
- <sup>11</sup> The battle brewing over Sheffield's green belt. URL: <https://www.sheffieldtribune.co.uk/the-battle-brewing-over-sheffields-green-belt/>
- <sup>12</sup> Unbalanced burden is escalating: Urban inequality landscape under sudden shocks. URL: [https://www.researchgate.net/publication/383717501\\_Unbalanced\\_burden\\_is\\_escalating\\_Urban\\_inequality\\_landscape\\_under\\_sudden\\_shocks](https://www.researchgate.net/publication/383717501_Unbalanced_burden_is_escalating_Urban_inequality_landscape_under_sudden_shocks)
- <sup>13</sup> Urbanization: expanding opportunities, but deeper divides. URL: <https://www.un.org/development/desa/en/news/social/urbanization-expanding-opportunities-but-deeper-divides.html>
- <sup>14</sup> Consequences of Uneven development. URL: [https://www.coolgeography.co.uk/gcsen/EW\\_Consequences\\_Uneven\\_development.php](https://www.coolgeography.co.uk/gcsen/EW_Consequences_Uneven_development.php)
- <sup>15</sup> Housing insecurity: impacts and solutions. URL: <https://post.parliament.uk/housing-insecurity-impacts-and-solutions/>
- <sup>16</sup> Impact of the UK Housing Crisis on Local Communities. URL: <https://ergsy.com/information/impact-uk-housing-crisis-local-communities/debt-management/416/415>
- <sup>17</sup> National Planning Policy Framework (December 2024). URL: [https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF\\_December\\_2024.pdf](https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf)
- <sup>18</sup> Equitable Housing. URL: <https://www.vaia.com/en-us/explanations/architecture/urban-studies-in-architecture/equitable-housing/>
- <sup>19</sup> Councillors' guide to urban design. URL: <https://www.designcouncil.org.uk/fileadmin/uploads/dc/Documents/councillors-guide-to-urban-design.pdf>
- <sup>20</sup> Sheffield Green Belt Land Set for Release Amid Housing and Employment Expansion Plans. URL: <https://www.cprepsy.org.uk/news/sheffield-green-belt-land-set-for-release/>
- <sup>21</sup> Thousands of homes approved for green belt sites. URL: <https://www.bbc.com/news/articles/c5y64re59elo>



- <sup>22</sup> Level 2 SFRA Site Assessment SES30 S03020. URL: <https://haveyoursay.sheffield.gov.uk/41788/widgets/124681/documents/84606> (Note: This refers to the PDF link within the main page)
- <sup>23</sup> Woodhouse, South Yorkshire - Wikipedia. URL: [https://en.wikipedia.org/wiki/Woodhouse,\\_South\\_Yorkshire](https://en.wikipedia.org/wiki/Woodhouse,_South_Yorkshire)
- <sup>24</sup> Sheffield releases short list of Green Belt land for development. URL: <https://www.placeyorkshire.co.uk/sheffield-releases-short-list-of-green-belt-land-for-development/>
- <sup>25</sup> Live air quality report and air quality forecast in Sheffield. URL: <https://air.plumelabs.com/air-quality-in-Sheffield-b4hD>
- <sup>26</sup> Air Pollution in Sheffield. URL: <https://www.aqi.in/au/dashboard/united-kingdom/sheffield>
- <sup>27</sup> Assessing the Polarising Impacts of Low-Traffic Neighbourhoods: A Community Perspective from Birmingham, UK. URL: <https://pmc.ncbi.nlm.nih.gov/articles/PMC11675817/>
- <sup>28</sup> Assessing the Polarising Impacts of Low-Traffic Neighbourhoods: A Community Perspective from Birmingham, UK. URL: [https://www.researchgate.net/publication/386596737\\_Assessing\\_the\\_Polarising\\_Impacts\\_of\\_Low-Traffic\\_Neighbourhoods\\_A\\_Community\\_Perspective\\_from\\_Birmingham\\_UK](https://www.researchgate.net/publication/386596737_Assessing_the_Polarising_Impacts_of_Low-Traffic_Neighbourhoods_A_Community_Perspective_from_Birmingham_UK)
- <sup>29</sup> Low-cost air quality sensor network calibration and deployment for urban pollution monitoring. URL: <https://acp.copernicus.org/articles/25/4477/2025/acp-25-4477-2025.pdf>
- <sup>30</sup> Handsworth Grange Community Sports College - Ofsted Report. URL: <https://reports.ofsted.gov.uk/provider/23/141495>
- <sup>31</sup> All 11 Sheffield schools currently rated 'requires improvement' or 'inadequate' by Ofsted in May 2025. URL: <https://www.thestar.co.uk/education/all-11-sheffield-schools-currently-rated-5093395>
- <sup>32</sup> Handsworth Medical Practice - GP Patient Survey. URL: <https://gp-patient.co.uk/patientexperiences?practicecode=C88036>
- <sup>33</sup> The Woodhouse Health Centre - GP Patient Survey. URL: <https://www.woodhousehealthcentre.co.uk/gp-patient-survey>
- <sup>34</sup> Sheffield City Council's online consultation for their local plan : r/sheffield. URL: [https://www.reddit.com/r/sheffield/comments/1kygt0k/sheffield\\_city\\_councils\\_online\\_consultation\\_for/](https://www.reddit.com/r/sheffield/comments/1kygt0k/sheffield_city_councils_online_consultation_for/)
- <sup>35</sup> Green spaces - Sustainability at Sheffield. URL: <https://www.sheffield.ac.uk/sustainability/green-spaces>
- <sup>36</sup> Objecting to emerging Local Plans. URL: [https://www.ftbchambers.co.uk/images/uploads/documents/Local\\_Plan\\_Objections\\_2020\\_Master.pdf](https://www.ftbchambers.co.uk/images/uploads/documents/Local_Plan_Objections_2020_Master.pdf)

- <sup>37</sup> BP35 Justification for the Removal of Proposed Development Sites. URL: <https://www.conwy.gov.uk/en/Resident/Planning-Building-Control-and-Conservation/Strategic-Planning-Policy/Adopted-Local-Development-Plan-LDP/Evidence-Base/Housing/BP35-Justification-for-the-Removal-of-Proposed-Development-Sites.pdf>
- <sup>38</sup> Environmental sustainability in mass housing development: learning from UK and Swedish case studies. URL: <https://www.tandfonline.com/doi/full/10.1080/13549839.2025.2496161?src=exp-la>
- <sup>39</sup> Does anyone else think the UK planning system is cooked? r/ukpolitics. URL: [https://www.reddit.com/r/ukpolitics/comments/1js26v1/does\\_anyone\\_else\\_think\\_the\\_uk\\_planning\\_system\\_is/](https://www.reddit.com/r/ukpolitics/comments/1js26v1/does_anyone_else_think_the_uk_planning_system_is/)
- <sup>40</sup> Reforming site thresholds for residential development. URL: [https://assets.publishing.service.gov.uk/media/6835e870c239ae3e866c040a/Reforming\\_site\\_thresholds.pdf](https://assets.publishing.service.gov.uk/media/6835e870c239ae3e866c040a/Reforming_site_thresholds.pdf)
- <sup>41</sup> Planning Reform Working Paper: Speeding up build out. URL: <https://www.gov.uk/government/publications/planning-reform-working-paper-speeding-up-build-out/planning-reform-working-paper-speeding-up-build-out>
- <sup>42</sup> Stalled Sites: An Empirical Investigation of Stalled Residential Sites in England. URL: <https://centaur.reading.ac.uk/67079/1/PPR%20Resubm%20-%20McAllisterStreet%20Wyatt.pdf>