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cc: PlanConsAreaTeamYorkshireandNorthernLincolnshire@defra.gov.uk

cc: sheffieldplan@sheffield.gov.uk (Sheffield City Council Strategic Planning)

Sent via email.

27 May 2026

Dear Sir or Madam,

Sheffield Local Plan: Main Modification MM184 and protection of best and most versatile agricultural land. Your refs: 514044 and 523236

I am writing on behalf of Sheffield Green Belt Alliance regarding the Sheffield Local Plan.

Natural England has engaged with Sheffield City Council on the protection of best and most versatile agricultural land ('BMV land') at three points: its Regulation 19 response (PDSP006, 9 February 2023); its response to the Proposed Additional Site Allocations consultation (NE ref 514044, 8 July 2025); and the September 2025 Statement of Common Ground (tracker 523236). We are concerned that subsequent Main Modifications to the Local Plan may materially affect the basis on which that common ground was reached.

Proposed Main Modification MM184 amends Policy GS4 to permit development on BMV land where the site is allocated for development. The Council's stated reason is that agricultural land value has already been taken into account when allocating the site.

That position is difficult to reconcile with the evidence. Under NE ref 514044, Natural England advised that "Agricultural Land Classification surveys should be required at planning application stage for this allocation, to determine whether the land is best and most versatile agricultural land, and to ensure that the development is consistent with Policy GS4". The Council adopted that advice, and the September 2025 SoCG records the agreed position for SES29 in those terms, with the same condition added by agreement for NES39 and CH05: "Agricultural land surveys required at planning application stage to determine whether the land is Grade 3a and ensure that development is consistent with policy GS4". Each entry concludes "Common ground agreed".

Equivalent ALC survey conditions were applied to other allocations in the Proposed Additional Site Allocations of May 2025 (EXAM124), including CH03, NES36, NES37, NWS31, SES30 and SS19. However, the Schedule of Proposed Main Modifications now removes those requirements from five of the six sites:

- CH03: survey requirement removed via MM459;
- NES36: survey requirement removed via MM350;
- NES37: survey requirement removed via MM351;
- SES30: survey requirement removed via MM411; and
- SS19: survey requirement removed via MM429.

The condition remains for NWS31, the only one of the six allocations where it has been preserved (through MM332, which inserts the allocation). That makes the deletion of equivalent safeguards elsewhere harder to understand, rather than less concerning.

The concern is not simply that wording has changed. The Council now relies on the allocation process as the reason why the loss of BMV land can be accepted in principle,

while removing the survey requirements that would establish whether BMV land is present and how significant that loss would be. If the Council's position is that agricultural land value was already assessed at plan-making stage, it is unclear why the earlier application-stage ALC survey conditions were needed. Conversely, if those conditions were needed because the evidence was incomplete, it is unclear how they can now safely be removed.

This is reinforced by the Integrated Impact Assessment, which records at Appendix F, Parameter 6 that there was "insufficient data/land surveyed for consistent appraisal of each site" in relation to agricultural land quality. That is difficult to reconcile with the Council's justification for MM184.

I enclose the James Bailey Planning Ltd representation to the Main Modifications consultation, which considers this issue in detail at paragraphs 2.32-2.42 and 3.13-3.18. It raises the concern that MM184 treats allocation as sufficient to permit the loss of BMV land, although the Council has not identified whether affected allocations comprise BMV land, assessed the extent of such land, or demonstrated that poorer quality land has been preferred where reasonable alternatives exist.

I would be grateful if Natural England could confirm:

- whether Natural England was formally consulted on MM184 and the removal of the ALC survey conditions from the above allocations;
- whether Natural England considers that its September 2025 Statement of Common Ground position, including the agreed survey wording for SES29, NES39 and CH05, remains current in light of MM184 and the deletion of equivalent safeguards from the other allocations;
- whether Natural England considers that the Council has demonstrated, at plan-making stage, that poorer quality agricultural land has been preferred to higher quality land where reasonable alternatives exist; and
- whether Natural England considers that the Plan, as now proposed to be modified, still provides adequate protection for BMV land.

In the underlying analysis also enclosed, at least 53% of the c.230 hectares of proposed Green Belt release is predicted to comprise BMV agricultural land, a strategic-scale loss of BMV now permitted by the Plan without either a plan-stage ALC assessment or the previously agreed application-stage survey safeguard. That is a material change from the position on which common ground was reached.

Yours faithfully,

Michael Parkin
on behalf of Sheffield Green Belt Alliance

Enclosures

1. James Bailey Planning Ltd Main Modifications representation.
2. Predicted BMV Analysis paper.