

# **Save S13 Green Belt**

## **Have Your Say on the Sheffield Plan**

A guide to responding to the Main Modifications consultation  
on city-wide issues and sites SES29 and SES30

**Deadline: 5pm, Tuesday 5th May 2026**

[saves13greenbelt.org.uk](https://saves13greenbelt.org.uk)

## What is this about?

Sheffield City Council wants to build on Green Belt land in our area. Two large sites are proposed:

- **SES29** - Handsworth Hall Farm: 870 homes and a large employment site
- **SES30** - Bramley Lane / Beaver Hill Road: 827 homes, a school and a burial ground

The Council is now asking for public comments on these proposals. This is a formal consultation, and your response will go directly to the independent Planning Inspectors who will decide whether the Plan is sound.

**Please respond. Even a short comment on just one issue can carry real weight. You do not need to be a planning expert.**

This guide is in three parts: Part 1 explains how to respond; Part 2 sets out city-wide issues affecting the whole Plan; and Part 3 covers the specific problems with our two S13 sites, SES29 and SES30. You can comment on any or all of them.

## Part 1 - How to respond

Late responses will not be accepted. The consultation period has been extended to 5 May because documents were updated after the consultation began.

Detail	Information
<b>Deadline</b>	5pm, Tuesday 5th May 2026
<b>Online</b>	<a href="https://haveyoursay.sheffield.gov.uk">haveyoursay.sheffield.gov.uk</a>
<b>Email</b>	<a href="mailto:SheffieldPlan@sheffield.gov.uk">SheffieldPlan@sheffield.gov.uk</a>
<b>Post</b>	Strategic Planning, Howden House, Union Street, Sheffield S1 2SH
<b>Phone</b>	(0114) 273 5259

### Please act now

This is your chance to comment before the Inspectors reach their final conclusions. Please send your response before 5pm on Tuesday 5th May 2026.

Even a few sentences on a single issue can make a difference. Please submit your comments and encourage friends, family and neighbours to do the same.

## What to include in your response

Your response does not need to be long. A few paragraphs is fine. Try to include:

- **Which “main modification” you are commenting on:** MM410 (SES29) and/or MM411 (SES30), or city-wide points referencing the relevant document
- **That you consider it unsound** - this is the key test the Inspectors apply
- **Why** - pick one or more issues from Parts 2 and 3 below and explain them in your own words
- **What you want to happen** - for example: “I request that SES30 be removed from the Plan and kept as Green Belt”
- **Ask to be notified** of the Inspectors’ final report and the adoption of the Plan

### Top tip:

**Write in your own words.** Personal responses carry more weight than identical copied letters. You do not need to cover every issue - just pick the ones that matter most to you.

**Important:** this consultation is only about the Main Modifications and related documents. Do not repeat earlier objections or comment on unchanged parts of the Plan. Focus on whether the modifications are sound and legally compliant.

### Key terms explained:

- **Unsound:** does not meet the planning tests the Inspectors must apply.
- **Justified:** backed by enough proper evidence.
- **Effective:** likely to work in practice.
- **Mitigation:** measures to reduce or offset harm.
- **Viability:** whether it is financially realistic.

## Part 2 - City-wide issues with the Plan

These points apply to the Plan as a whole, not just our local sites. They are powerful because they use the Council's own evidence against it. You can include one or more of these alongside your comments on SES29 and SES30, or submit them separately.

### **The Council's own assessment says the modified Plan is worse for the environment**

The Council's own Integrated Impact Assessment (IIA) says the modified Plan performs worse on soil and land, landscape, biodiversity and transport. This is not our claim - it is in the Council's own evidence.

**A**

The IIA says the modifications rely on Green Belt release, leading to permanent loss of greenfield land. Landscape and townscape effects become more negative. Biodiversity outcomes are slightly worse. Transport also worsens because growth in more peripheral, car-dependent locations leads to more vehicle movements.

This is set out in the IIA Non-Technical Summary, Page 16. The increase in housing delivery comes at a direct, documented cost to the Plan's environmental performance - it systematically degrades the Plan's performance across soil, transport and climate change mitigation objectives.

**Why this matters:** the modified Plan is not justified, because it is not supported by proportionate evidence. The environmental harm has worsened and the Council has not shown the trade-off is acceptable.

### **The "Golden Rules" for Green Belt release are too vague to be effective**

The modifications say the Green Belt "Golden Rules" apply to the new sites: higher affordable housing, open space (under Policy NC15), and compensatory improvements to the remaining Green Belt.

But the policies do not show, in site-specific terms, exactly what is required, whether it is viable and deliverable, how it affects housing capacity, or how it will be enforced.

**B**

The site-specific conditions state that proposals must deliver compensatory improvements that "must be suitable and effective" to offset impacts on the Green Belt environment and amenity (Schedule of Proposed Main Modifications, Page 224, MM352). But unlike Biodiversity Net Gain, which requires a strict 10% uplift, the phrase "suitable and effective" has no defined or proportionate metric. Without a quantifiable mechanism to dictate what counts as a "suitable" improvement, the rule is open to wide interpretation at the planning application stage.

**It is not enough to say that "the Golden Rules apply"**. If the Council relies on those rules to justify Green Belt release, it should show clearly what they mean in practice for these sites and how they will be delivered.

**Why this matters:** the Plan is not justified and not effective, because it relies on a vague package of improvements without proving deliverability.

C

### **The changes are significant - the Council's consultants say so**

The Council may try to play down the scale of the modifications. But its own consultants (AECOM) say the modifications were significant enough to need further appraisal because they change the spatial strategy, release Green Belt, and add school, burial and habitat-related consequences.

To put this in local terms: the modifications propose increasing the number of homes in South East Sheffield from 1,640 to 3,013 - an increase of 84%. The Inspectors themselves acknowledge the scale of this shift, stating: "The option of delivering potential additional housing sites on greenfield sites in the Green Belt would represent a significant departure from the spatial strategy which has informed site option work to date" (Stage 2 post-hearings letter, Page 8, Para 37).

While the Council has recognised some of the impacts, the IIA repeatedly defers key questions to the planning application stage. It relies on future studies, uncommitted school delivery and minor road junction works, rather than showing now how the impacts will be addressed. That calls into question whether the cumulative effects of adding so many homes to this area can be properly and viably mitigated.

**These are not minor tidying-up changes.** Residents are entitled to challenge whether the package is sound and properly evidenced.

D

### **The Habitats Regulations Assessment (HRA) reaches a positive conclusion because mitigation is assumed**

The HRA says the Plan includes 38,318 homes, including 3,771 on greenfield Green Belt sites. It accepts that this could increase pressure on protected countryside, especially from more recreation and visitors.

The report says this harm can be avoided, but many of the promised protections are still only set out in broad terms. The detailed, costed Mitigation Delivery Plan is to come later, up to 12 months after the Plan is adopted.

That means the report's positive conclusion depends on future mitigation being put in place, rather than showing that the problem has already been fully addressed.

**If the Plan depends on measures to reduce or offset harm,** those measures need to be specific, documented, credible and deliverable.

**Why this matters:** if the Plan relies on protections that are not yet fully worked out, there is a real question over whether it is backed by enough evidence and whether it can be delivered in practice.

### **Double standards on deliverability**

Elsewhere in the modifications, sites are being deleted because they are unavailable for delivery (for example, SES27 on page 136 of the Policies Map changes). The reason given is “site unavailable”.

**E**

Yet the new strategic Green Belt sites are being proposed without the same rigorous evidence of availability and deliverability. For example, it is unclear if Town End Farm in Ecclesfield (NES37) or SES30 will ever be “available” in the lifetime of the plan due to their agricultural tenancies that will have to be broken<sup>1</sup> - a lengthy process.

**In short:** if some sites are removed because there is not enough evidence of delivery, the same standard should apply to the new Green Belt sites.

### **Viability**

The NPPF requires a plan to be “effective” - meaning deliverable [NPPF, Page 12, Para 35c] - and the Council’s own methodology states that deliverability relies on viability (IIA Report Version 2, Page 89, Stage 5).

Yet the IIA admits that the costs of accounting for severe constraints on strategic sites make the viability “unclear” (IIA Report Version 2, Page 302).

**F**

Because the viability of accounting for constraints remains uncertain and is deferred to the application stage, the Plan does not show that these sites are deliverable in practice.

Finally, it should be noted the Inspectors have only said these sites are “potentially deliverable/developable” (Stages 3 and 4 post hearings letter, Page 5, Para 12) - the Council has not yet fully demonstrated that they can be delivered in practice.

**In short:** the Plan cannot be shown to be effective if the viability of delivering and mitigating these sites remains uncertain.

## **Part 3 - Our local S13 sites**

These are the specific issues with the two proposed allocations in our area. Pick the points that matter most to you and explain them in your own words.

**The actual text of the Main Modifications is at the end of this document.**

### **Site SES30 - Bramley Lane / Beaver Hill Road (MM411)**

This is the proposed allocation of 827 homes, a secondary school and a multi-faith burial ground on 35 hectares of Green Belt. Here are the key issues you could raise:

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<sup>1</sup> <https://saves13greenbelt.org.uk/townend-farm-legal-opinion>

## Access

MM411 requires that all traffic from 827 houses, a school and a burial ground would have to use Beaver Hill Road. This road is already heavily used by the Fire Training Centre and Woodhouse Juniors FC for parking, as well as a main car and bus route between Woodhouse and Handsworth.

The development policy of the site says access is “subject to further transport assessment”, acknowledging the access problems remain unresolved.

1

All traffic going to Handsworth would pass metres from Handsworth Grange School, putting schoolchildren at risk of poor air quality.

The Council’s own transport modelling shows the Retford Road / Beaver Hill Road junction would be at 98% capacity by 2039, even with improvements. Handsworth Grange Road would become a rat-run. Without improvements, that junction exceeds 150% capacity. That means gridlock.

**In short:** safe and suitable access for a development of this scale has not been demonstrated.

## Ecology

Under the Environment Act 2021, all new developments are legally required to deliver at least 10% Biodiversity Net Gain (BNG). The Council has not shown how this can be achieved on SES30 and there is no mention of it in MM411.

2

The Council’s own ecological assessment assigns high importance to every area of habitat on the site. It even suggests the site could be registered as a BNG habitat site on the national register, which is the opposite of building on it.

The ecological appraisal was published months after the decision to allocate the site and states that protected species surveys should have been completed before determining to put the site forward.

**Ask:** where is the evidence for the required 10% BNG? What is the actual impact on wildlife?

## Can the site actually deliver what the Council claims?

The site is subject to multiple constraints: an 800m watercourse, it is adjacent to ancient woodland (Shirtcliff Wood), has kilometres of hedgerows, many veteran trees, public footpaths, areas of coal mining risk, and the need for ecological buffers. All of these reduce the land available for building and the number of houses that can be built - the entire justification for releasing this Green Belt.

3

For the Plan to succeed on its own figures, the Council expects 150 homes a year to be built on the site. That is far above normal rates for a site this size (typically 60-70). The nearby Waverley development (4,000 homes, multiple builders) only manages about 150 a year on a huge, flat brownfield site with no ecological or landscape constraints.

**In short:** the Plan’s numbers don’t add up.

### **Speculative Green Belt release - what happens to the school and burial ground land?**

9 hectares of Green Belt are being set aside for a school (5 ha) and a burial ground (4 ha). But neither use is confirmed.

At the hearings, the evidence showed the school may not be needed - the Council's education department says its preference is to expand existing schools. No evidence has been produced to show the site is suitable for burials.

**4**

The modification says that if these uses are not needed, the land will be "reconsidered at the first plan review". The most likely outcome? More housing. That could push the total on this site to well over 1,000 homes.

The NPPF says Green Belt should only be released in exceptional circumstances. The exceptional circumstances for releasing this land include a school and burial ground. If those uses don't happen, the justification for releasing the Green Belt disappears - but the land will already be gone.

**This is Green Belt release by the back door.** The Plan should not be removing land from the Green Belt on the basis of uses that will never happen and to deliver housing that is not part of the plan.

### **Suggested closing line for SES30**

*"I consider Main Modification MM411 (site SES30) to be unsound. It is not justified and not consistent with national policy. I request that SES30 be removed from the Plan and retained as Green Belt."*

### **Site SES29 - Handsworth Hall Farm, Finchwell Road (MM410)**

This is the proposed allocation of 870 homes and 20 hectares of employment land on 56 hectares of Green Belt. Here are the key issues you could raise:

### **Can the site deliver what the Council claims?**

**1**

The Council assumes a net developable area of 44.84 hectares (24.84 ha for housing, 20 ha for employment). But the landowner's own masterplan submitted in the May/June 2025 consultation (examination ref. 1.0633), which accounts for the site's constraints, shows only 34.59 hectares - over 10 hectares less, roughly 23% less buildable land than the Council assumes.

Like SES30, the Council expects 110 homes to be built each year, but industry research (Lichfield's 'Start to Finish') shows that rate is normally only achieved on sites of 1,500+ homes with multiple builders working at once.

The overall housing supply in the Plan has a buffer of less than 1% - 298 units. That matters because if SES29 underdelivers, the Plan fails to meet its own housing requirement.

**In short:** the Council is again over-promising on what sites can deliver.

## Contaminated land and mining risk

The site has potentially contaminated land, is within 250 metres of a historic landfill, and needs a Coal Mining Risk Assessment.

2

Data from the Mining Remediation Authority shows areas of “development high risk” with old mine workings across the site. No investigation has been done to find out how much of the site is actually safe to build on.

The cost of cleaning up contamination and making the land stable has not been included in any viability assessment.

**You cannot soundly plan for 870 homes** if you do not know how much of the site is safe to build on.

## Access and infrastructure

The modification admits the access is “subject to further transport assessment work” - in other words, they haven’t worked out how to get in and out of the site yet.

3

The site needs major highway improvements to the Retford Road / Beaver Hill Road junction (the same junction that SES30 also depends on), contributions to wider road improvements, space for a potential new railway station, protection of public footpaths, an archaeology assessment, and ecological buffers to nearby wildlife sites.

**None of this infrastructure is funded or committed**, and the access strategy is not yet confirmed.

## Ecology and biodiversity

Elsewhere in the examination, evidence is being tested properly and sites are being removed where they cannot be shown to be suitable or deliverable. The same discipline must apply to this site.

4

SES29 was proposed for allocation in March/April 2025, yet the Baseline Biodiversity Net Gain Assessment used to support its release was written on 11/12/2023 and only made public on 7/10/2025.

That is not timely, transparent, or up-to-date evidence. The document itself points to missing survey work and identifies clear biodiversity value, yet MM410 does not rectify that defect before the allocation is carried forward.

Instead, it defers ecology matters to later masterplanning and application stages. If the ecology evidence was incomplete, unpublished, and already old

when SES29 was proposed, and MM410 does not cure that defect, the allocation should not proceed.

**In short:** you cannot allocate Green Belt land on the strength of ecology evidence that was already old, still incomplete, and only disclosed after the allocation decision had effectively been taken.

**Suggested closing line for SES29**

*"I consider Main Modification MM410 (site SES29) to be unsound. It is not justified and not consistent with national policy. I request that SES29 be removed from the Plan and retained as Green Belt."*

## MM410 - Main Modifications for proposed Site Allocation SES29

<b><u>Site Reference: SES29</u></b>	<b><u>Address: Handsworth Hall Farm, Land at Finchwell Road, S13 9AS</u></b>	
<b><u>Allocated use: Mixed Use</u></b>		<b><u>Site area: 56.40 Hectares</u></b>
<b><u>Net housing area: 24.84 Hectares</u></b>		<b><u>Total housing capacity: 870 Homes (735 Homes within plan period)</u></b>
<b><u>Net employment (Class E(g)(i) area: 0.00 hectares</u></b>	<b><u>Net employment (Class B2, B8 &amp; E(g)(ii) &amp; (iii)) area: 20.00 hectares</u></b>	<b><u>Net (Other employment uses) area: 0.00 hectares</u></b>
<p><b><u>Conditions on development:</u></b></p> <ul style="list-style-type: none"> <li>• <u>This site was formerly designated as Green Belt, so the ‘Golden Rules’ set out in the National Planning policy Framework will apply. Open space should be provided in accordance with Policy NC15.</u></li> <li>• <u>In accordance with the Golden Rules the level of affordable housing required will be expected to be at a higher level than would otherwise apply to land which has not been released from the Green Belt.</u></li> <li>• <u>The Golden Rules do not apply to the employment area of the site.</u></li> <li>• <u>The location of the 20ha of employment area will be determined through the masterplanning process.</u></li> <li>• <u>Proposals for development on key sites within the Innovation District, including the employment element of SES29 shall support the innovation focused approach to delivering advanced manufacturing, and advanced health &amp; wellbeing uses.</u></li> <li>• <u>As this allocation was removed from the Green Belt, proposals should deliver those compensatory improvements identified within the ‘Green Belt Allocations: Compensatory Improvement Opportunities within remaining Green Belt’ document or successor documents. These seek to offset the potential impacts of the allocation’s development on the Green Belt environment and amenity of residents and visitors. Should alternative improvements be proposed these must be suitable and effective.</u></li> <li>• <u>The site has been identified as having potentially contaminated land. A detailed assessment of the extent of land contamination and identifying sufficient mitigation/remediation will be required at planning application stage.</u></li> <li>• <u>A Coal Mining Risk Assessment is required at the planning application stage where a site layout is included. It should also identify any other mitigation, treatment and remediation measures that are necessary to ensure that the development is not subject to land instability or other public safety risks.</u></li> <li>• <u>The site is identified as being within 200m of a road exceeding an average trip generation of 19,000 trips per day. A detailed Air Quality Assessment will be required at planning application stage identifying sufficient mitigation measures.</u></li> <li>• <u>Site is within 250m of a historic landfill site. An assessment of the impact (including identifying any necessary mitigation/remediation works) will be required at planning application stage.</u></li> </ul>		

- Assessment will be required at planning application stage to determine the impact of the nearby Environment Agency waste permit site(s) and any mitigation required.
- A suitably detailed Heritage Statement that explains how potential archaeological impacts have been addressed will be required prior to the submission of any planning application. This will need to be informed by the results of a staged archaeological evaluation, with the results addressed by the design of the scheme. The resulting development proposal can then avoid or minimise harm to the significance of identified archaeology and heritage assets and their settings.
- In accordance with policy NC1, the masterplanning of the site must include mitigation measures that address any significant visual and landscape impacts whilst enabling integration with the surrounding area.
- Explore opportunities to provide ecological corridors having regard to the Local Nature Recovery Network. Where feasible, Biodiversity Net Gain should be delivered on site within these areas in the first case, in line with the BNG hierarchy.
- A minimum 15m buffer is required to the adjacent Waverley Pond and Handsworth Tip Local Wildlife Sites.
- Subject to further transport assessment work, access to the highway will be required off Orgreave Lane and/or Highfield Lane.
- Highways improvements to the Retford Road / Beaver Hill Road junction, identified within the Infrastructure Delivery Plan, will be required.
- Contributions may be required to highways improvements at junctions on the strategic and local road network.
- Any public footpaths/permissive footpaths that cross the site will need to be taken into account and protected through subsequent site masterplanning and/or planning applications.
- Due consideration should be given to any impacts of flood risk identified in the Level 2 Strategic Flood Risk Assessment. All mitigation matters identified in the "Recommendations, FRA requirements, and further work" section of the Level 2 SFRA site assessment should be addressed at or before planning application stage.
- Contributions may be required towards the provision of a new station on the rail line.
- The layout of the site should take account of the opportunity to provide a new station on the rail line, by providing new pedestrian and cycle links over the rail line and options for car parking and other ancillary access arrangements on the site. The precise location(s) will be informed by subsequent site masterplanning.

## MM411 - Main Modifications for proposed Site Allocation SES30

<b><u>Site Reference:</u></b> SES30	<b><u>Address:</u></b> Land between Bramley Lane and Beaver Hill Road, S13 7JH	
<b><u>Allocated use:</u></b> Housing		<b><u>Site area:</u></b> 35.28 Hectares
<b><u>Net housing area:</u></b> 23.65 Hectares		<b><u>Total housing capacity:</u></b> 827 Homes
<b><u>Net education use area:</u></b> Up to 5.00 Hectares		<b><u>Net multi-faith burial ground use area:</u></b> Up to 4.00 Hectares
<b><u>Net employment (Class E(g)(i &amp; ii)) area:</u></b> 0.00 hectares	<b><u>Net employment (Class B2, B8 &amp; E(g)(iii)) area:</u></b> 0.00 hectares	<b><u>Net (Other employment uses) area:</u></b> 0.00 hectares
<p><b><u>Conditions on development:</u></b></p> <ul style="list-style-type: none"> <li>• <u>This site was formerly designated as Green Belt, so the ‘Golden Rules’ set out in the National Planning policy Framework will apply. Open space should be provided in accordance with Policy NC15.</u></li> <li>• <u>In accordance with the Golden Rules the level of affordable housing required will be expected to be at a higher level than would otherwise apply to land which has not been released from the Green Belt.</u></li> <li>• <u>As this allocation was removed from the Green Belt, proposals should deliver those compensatory improvements identified within the ‘Green Belt Allocations: Compensatory Improvement Opportunities within remaining Green Belt’ document or successor documents. These seek to offset the potential impacts of the allocation’s development on the Green Belt environment and amenity of residents and visitors. Should alternative improvements be proposed these must be suitable and effective.</u></li> <li>• <u>5 hectares of land within the allocation shall be safeguarded to meet the Council’s identified need for a mainstream secondary school. The location of this land should be identified through the masterplanning of the site and within subsequent planning applications. Any alternative proposals in relation to this land will be considered as part of the first review of the Plan if necessary.</u></li> <li>• <u>4 hectares of land within the allocation shall be safeguarded to meet the Council’s identified need for a burial site. The location of this land should be identified through the masterplanning of the site and within subsequent planning applications. Any alternative proposals in relation to this land will be considered as part of the first review of the Plan if necessary.</u></li> <li>• <u>Any public footpaths/permissive footpaths that cross the site will need to be taken into account and protected through subsequent site masterplanning and/or planning applications on the site.</u></li> <li>• <u>Subject to further transport assessment, access to the highways is required off Beaver Hill Road.</u></li> <li>• <u>Highways improvements to the Retford Road / Beaver Hill Road junction, identified within the Infrastructure Delivery Plan, will be required.</u></li> </ul>		

- Contributions may be required to highways improvements at junctions on the strategic and local road network.
- Explore opportunities to provide ecological corridors having regard to the Local Nature Recovery Network. Where feasible, Biodiversity Net Gain should be delivered on site within these areas in the first case, in line with the BNG hierarchy.
- A minimum 15m buffer is required to the adjacent Smelter Wood, Shirtcliffe Valley Grasslands and Shirtcliffe Woods & Fields Local Wildlife Sites. Green corridors will also be required within the site where appropriate to ensure hedgerows and watercourses are protected.
- In accordance with policy NC1, the masterplanning of the site must include mitigation measures that address any significant visual and landscape impacts whilst enabling integration with the surrounding area.
- This site is identified as impacting on an area of known archaeological interest and due consideration should be given to the impact of any proposal prior to the submission of any planning application. Development proposals should implement the recommendations set out in the Heritage Impact Assessment prepared in support of the Local Plan, or other suitable mitigation measures agreed with the Local Planning Authority, to avoid or minimise harm to the significance of archaeological assets.
- Due consideration should be given to any impacts of flood risk identified in the Level 2 Strategic Flood Risk Assessment. All mitigation matters identified in the “Recommendations, FRA requirements, and further work” section of the Level 2 SFRA site assessment should be addressed at or before planning application stage.
- A Coal Mining Risk Assessment is required at the planning application stage where a site layout is included. It should also identify any other mitigation, treatment and remediation measures that are necessary to ensure that the development is not subject to land instability or other public safety risks.