

SHEFFIELD LOCAL PLAN EXAMINATION

Further Main Modifications Consultation

Collated representations

Chapeltown, Ecclesfield & Grenoside Save Our Green Belt Action Group (CEG)

Allocations: CH03, CH04, CH05, NES36, NES37, NES38 and NES39

28 October 2026

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SHEFFIELD LOCAL PLAN EXAMINATION

FURTHER MAIN MODIFICATIONS — OVERARCHING CUMULATIVE REPRESENTATION

Chapeltown, Ecclesfield & Grenoside Save Our Green Belt Action Group (CEG) | October 2026

Allocations: CH03, CH04, CH05, NES36, NES37, NES38 and NES39

Executive summary — the cumulative case remains unanswered

CEG objects to the continued justification of these seven closely concentrated Green Belt allocations. The Further Main Modifications (FMMs) and September 2026 updated evidence do not resolve the central concern we raised in May: Sheffield is treating a major, interdependent urban expansion as a collection of separate sites, while relying on housing and employment benefits whose deliverability remains seriously disputed.

This is not opposition to homes, affordable housing or land allocated for employment. It is a challenge to releasing irreplaceable Green Belt before the Council has demonstrated that the additional site allocations are necessary, deliverable and supported by the required infrastructure. Our previously submitted transport, ecology, flood, capacity and alternative-sites evidence remains before the examination. The Council should be required to show where it has substantively answered that evidence, not treat the passage to a further consultation as an answer in itself.

1. A village-scale concentration, not seven isolated sites

Across the wider S35 Green Belt housing allocations, the Council proposes approximately 1,567 homes within a radius of roughly three miles, an addition comparable in scale, population, and housing to a market town like Bakewell in Derbyshire. Within the CEG area are four housing allocations (NES37, NES38, NES39 and CH05) alongside three employment allocations, CH03, CH04 and NES36. Sheffield City Council proposes 1,395 new homes across the four Green Belt housing allocations in Chapeltown, Ecclesfield and Grenoside.

The seven allocations would draw on many of the same constrained roads, junctions, schools, health services, drainage networks and wildlife corridors. Their effects will not stop at allocation boundaries. The revised FMM evidence must be tested against this cumulative reality, including the consequences for the existing communities of Chapeltown, Ecclesfield and Grenoside and the separation between settlements.

2. The capacity challenge changes the balance of benefits and harms

The Sheffield Green Belt Alliance submitted constraint-based capacity evidence in May 2026. It examined land needed for access, landscape and ecological buffers, watercourses, heritage, education, burial provision and other infrastructure. These were not minor design preferences: they affect the land realistically available for housing. The Council has continued to use the original allocations without a clear, site-by-site explanation addressing that challenge.

Housing allocation	Council homes	SGBA estimate	Difference
NES37	592	354-413	179-238
NES38	188	130-152	36-58
NES39	66	38-41	25-28
CH05	549	385-420	129-164
Combined	**1,395**	**907-1,026**	**369-488**

These are the Alliance's submitted constraint-based estimates, not revised Council allocations. They nevertheless raise a substantial issue: across these four housing sites the anticipated capacity could be 369-488 homes lower than the figure used to justify their release, a difference of approximately 26-35%. The Council must explain whether its claimed housing benefits remain achievable after all necessary land uses and constraints are accounted for.

The Council's updated housing supply evidence, including EXAM187A, continues to rely on the stated capacities of the proposed Green Belt allocations. CEG questions whether the housing supply and delivery assumptions underpinning the Plan adequately reflect the constraints identified in the Alliance's previously submitted evidence. The Council should demonstrate how these constraints have been considered in assessing the realistic capacity and anticipated delivery of NES37, NES38, NES39 and CH05, and explain any implications for the housing trajectory.

Affordable housing must be assessed across all four housing allocations. EXAM187A confirms anticipated baseline affordable housing contributions of 178 homes at NES37, 56 at NES38, 20 at NES39 and 165 at CH05 — a combined total of 419 homes. This includes corrections reducing the previously reported contributions for NES37 and NES39 by 29 homes. CEG questions whether these anticipated benefits remain achievable if the Alliance's lower, constraint-based housing capacities are borne out.

3. Where are the facilities for a development of this scale?

A concentration comparable in housing scale to a new market town demands more than promises to consider facilities later. The Council's 2024 Infrastructure Delivery Plan anticipated no significant new community facilities because development was expected largely on brownfield sites; the 2025 addendum described that assessment as broadly up to date. Yet substantial Green Belt housing allocations were subsequently added without clearly identifying how the necessary community facilities would be accommodated and delivered. Where is the corresponding plan for community centres, meeting places, libraries and youth facilities?

At the Sheffield City Council Strategy and Resources Policy Committee on 7 October 2026, the Council Leader referred to facilities being addressed at master-planning and planning-application stage, and to a commitment to their provision. But a verbal statement of intent is not an identified site, an allocation condition, a funding commitment or an enforceable delivery mechanism. If the Council's case for releasing Green Belt land is that available urban capacity has been exhausted, where has land for the necessary community facilities been allowed for within the proposed allocations? The Council should demonstrate how community centres, meeting places, libraries and youth facilities can be accommodated alongside the stated housing capacities, and identify the land, funding and delivery arrangements needed to secure their provision. Why should residents be expected to rely on future planning applications to deliver facilities that the Plan does not clearly require or secure?

FMM28 slightly enlarges the NES38 allocation to accommodate access, while retaining the stated capacity of 188 homes. The Council has recognised the implications of access and amended the size of the allocation accordingly. It should be equally explicit about how the site's other known constraints have been allowed for and reconcile its stated capacity with the Alliance's submitted constraint-based evidence. NES37 also faces competing demands for education, burial provision and environmental protection. These are strategic questions that should be addressed in the Plan, not left unresolved until individual applications.

A Local Plan should do more than allocate land for housing; it should show how it will build better communities. Without clear provision for the facilities residents need, this risks becoming a plan for more houses, rather than for *places to live*.

4. New agricultural evidence adds to the case against these allocations

EXAM219's updated predictive agricultural-land evidence identifies a greater likelihood of higher-quality, potentially best and most versatile agricultural land at NES37, NES38 and NES39. The updated Sustainability Appraisal changes the Land and Soils assessment for the wider Grenoside/Ecclesfield housing location from Minor Negative to Moderate Negative. CH03's assessment also indicates a greater concern about agricultural land quality. CEG asks the Council to explain the changes for CH05 and NES36 and whether the cumulative agricultural harm and choice of alternatives have been reassessed. Predictive mapping is not a substitute for a site-specific agricultural land survey.

At Town End Farm (NES37), the Riddle family has explained, including at the Inspectors' hearings, that development of the allocated land would force them to cease cattle farming and make their wider agricultural business economically unviable. Town End Farm provides the grazing, water supply, cattle housing and handling facilities essential to their suckler herd of approximately 70 cattle, including facilities required for calving, animal welfare and statutory testing. Although the family farms approximately 40 hectares elsewhere, predominantly in Grenoside and Ecclesfield, that land cannot replace these essential facilities. Without the cattle operation, the remaining business would be too small to sustain the costs of agricultural machinery and other operating expenses. The consequences could therefore extend beyond the loss of Town End Farm to the Riddles ceasing to farm approximately 40 hectares of additional agricultural land**.** This is particularly significant given that the Council's updated agricultural evidence identifies substantial areas of higher-quality, potentially Best and Most Versatile agricultural land across the wider Grenoside and Ecclesfield area. The loss of NES37 could therefore bring the family's entire farming operation to an end.

At Strawberry Fields (CH05), Chris Acaster has explained that he and his brother are already operating on very narrow financial margins, despite farming approximately 90 hectares of additional land. Strawberry Fields is an integral part of their wider farming operation, producing crops for the food supply chain while also providing straw from the wheat harvest for bedding their beef cattle, which graze on other land they farm. Purchasing and transporting replacement straw would be prohibitively expensive because of its bulk. With farmers receiving increasingly limited returns for their produce, the viability of their business depends on farming sufficient land and making efficient use of resources across their holdings. Losing Strawberry Fields (CH05) would therefore undermine not only crop production but also the sustainability and economic viability of their cattle operation and wider farming business. As with the Riddle family at NES37, the consequences extend beyond the land proposed for development. The Council must assess these wider agricultural and economic impacts, including the potential loss of

established farming livelihoods and local food production, rather than considering only the hectares directly allocated.

5. Employment allocations: the South Yorkshire strategic question comes first

The Inspectors' EXAM217B correspondence raises the relationship between large-scale logistics provision and the emerging South Yorkshire Spatial Development Strategy. CEG asks the Council to answer that strategic question first: why must CH03, CH04 and NES36 be released now, before the regional approach to the location, scale and timing of logistics provision is settled? CEG's commercial-property research, updated to 12 October 2026, identifies marketed industrial and warehouse premises locally and across the Sheffield-Barnsley area, including examples at Provincial Park, Nether Lane (146,807 sq ft), Thorncliffe Business Park (36,699 sq ft) and Rockingham 36 (55,244 sq ft). These listings require reconciliation with committed development and demand, not dismissal.

The Council should publish a transparent, South Yorkshire-wide reconciliation of marketed premises, available and committed plots, cross-boundary supply, the type of floorspace needed, and the timing of demand. A further distinction is essential: employment land is not the same thing as employment benefit. Modern logistics facilities may be highly automated; job numbers, skills, pay, local recruitment and displacement cannot simply be inferred from hectares allocated. CEG questions the additional employment benefits claimed for an area with relatively high existing employment and asks for evidence of the likely number and quality of jobs, and whether they meet identified local needs. These issues should be tested alongside the South Yorkshire Spatial Development Strategy work highlighted by EXAM217B.

FMM31 acknowledges that CH04 access and associated works may extend beyond the Industrial Zone into sensitive land. The true footprint of roads, remediation, environmental mitigation and operations must be assessed alongside the other employment sites. FMM5's strengthened biodiversity approach increases the importance of explaining how development can be achieved without unacceptable cumulative loss or fragmentation of wildlife habitat.

6. Lessons for Sheffield City Council from Astley and residential impacts

The experience of Astley Business Park should be a warning to Sheffield City Council about the consequences of locating intensive warehouse and yard operations close to established homes without resolving foreseeable amenity conflicts. Residents' complaints and subsequent adverse publicity have consequences for residents, operators and the Council's reputation; operational restrictions can also create difficulties for businesses. CEG asks what lessons the Council has drawn and how it will avoid repeating those problems at CH03, CH04 and NES36. The assessment must address real operating patterns, HGV routes, night-time activity, noise, lighting and cumulative effects rather than treating the issue as an matter to be dealt with by the planning applications.

Hesley Wood (CH04) illustrates the risks of steep, environmentally constrained land and a particularly narrow access corridor close to existing homes, but it is part of the wider case, not a standalone objection. Residents alongside both the proposed employment allocations and the housing allocations face changed traffic, construction activity and pressure on their surroundings. The combined effects of CH03, CH04 and NES36, alongside housing and development across the Barnsley boundary, require integrated assessment. CEG also asks how the absence of a published site-specific preliminary ecological appraisal and biodiversity

net gain assessment for NES39 has been addressed, particularly given the adjacent Local Wildlife Site and the strengthened biodiversity provisions in FMM5.

7. Up to 17 years of construction across CEG communities

Across the CEG allocations, residents face the prospect of a development programme stretching for up to 17 years. Even so, overlapping phases could mean many years of construction traffic, heavy vehicles, noise, dust, vibration, road disruption and pressure on narrow residential routes. For some households, that would affect a significant part of their education, working life or retirement.

The fact that construction impacts can later be controlled through planning conditions does not answer the plan-making question. These are strategic allocations precisely because their scale and combined infrastructure requirements should be considered in advance. The Plan should identify how overlapping construction phases, shared access routes, highway capacity, HGV movements, safety near schools, drainage and environmental safeguards can be coordinated across sites. A construction-management plan for one permission cannot by itself resolve impacts created by several permissions over potentially 17 years. CEG asks for a strategic framework and credible cumulative assessment now, with detailed implementation to follow at application stage.

8. Unresolved cumulative harm and the Council’s responsibility

Our May representation documented the combined risks for highways, flooding, biodiversity, air quality, landscape and community infrastructure. CEG also submitted specialist transport evidence. The FMMs do not remove those concerns; the changed agricultural assessment, access footprint and affordable-housing evidence make a coherent response more necessary. The Council should identify exactly where the earlier cumulative evidence has been addressed and why its conclusions remain sound.

The September 2026 Habitats Regulations Appropriate Assessment Review does not resolve the ecological concerns affecting individual Green Belt allocations. Its conclusions concern the potential effects of the Plan on European protected sites and should not be taken as confirmation that the proposed allocations are environmentally acceptable. The Review also recognises that additional development can create recreational pressures requiring mitigation. CEG therefore questions whether the Council has adequately assessed the cumulative effects on Local Wildlife Sites, ecological corridors and other important habitats, particularly in light of the revised biodiversity requirements in FMM5.

These allocations are the Council's choices, advanced through its Plan. The Inspectors examine soundness; they did not choose the sites or determine that Sheffield had exhausted every urban opportunity. Sheffield City Council must take ownership of its decisions and account for the evidence and alternatives relied upon, including community-identified urban opportunities and the adequacy of its brownfield evidence. It should not present contested local planning judgements as unavoidable instructions from the Inspectors.

The cumulative impact of the proposed allocations must also be considered alongside the demographic characteristics and healthcare needs of existing communities. According to the 2021 Census, 25% of residents in East Ecclesfield and 25.6% in West Ecclesfield are aged 65 or over, compared with 17.1% across Sheffield and 18.3% nationally. Together, these wards have 8,922 residents aged 65 and over.

This significantly older population raises particular concerns about the capacity and accessibility of GP services, community healthcare and support for increasingly complex health needs. The concentration of additional housing allocations in these communities makes it essential to understand whether existing services can accommodate increased demand and what additional provision may be required.

CEG asks the Council to demonstrate how the updated Sustainability Appraisal and supporting infrastructure evidence have considered these cumulative pressures, taking account of the existing population's age profile and the proposed scale of development. In particular, what evidence demonstrates that sufficient healthcare capacity and accessible services will be available to meet the needs of both existing and future residents?

Sheffield City Council is currently promoting the Local Plan through a video on social media Sheffield City Council: Local Plan promotional video which states: "*A small amount of Greenbelt land has been included in the plan. We've tried hard to minimise this and over 96% of Sheffield's Greenbelt remains protected."* The video also claims that the Plan will make neighbourhoods *"healthier and more attractive"* and ensure that Sheffield *"develops in a way that works for everyone."*

CEG considers this presentation misleading by omission. Although the citywide percentage may be mathematically correct, it conceals the highly unequal geographical distribution of the proposed Green Belt release, approximately half of which is concentrated in S35. It also presents environmental improvements as benefits without acknowledging the substantial loss of existing countryside, agricultural land and wildlife habitats in the communities most affected.

These concerns are particularly relevant to the current consultation, given the updated agricultural evidence in EXAM219, the revised Sustainability Appraisal and the outstanding questions about cumulative environmental impacts and realistic development capacity.

The human cost is already being felt. Residents living beside proposed housing and employment sites face prolonged uncertainty about their homes and neighbourhoods, while two established farming businesses confront the possible loss of their livelihoods. A Local Plan should be a social contract between the Council and all Sheffield's residents, founded on fairness, transparency and proper consideration of the cumulative consequences for those most affected. It must serve the whole city, not simply present a citywide picture that masks the disproportionate impacts on individual communities.

9. Action requested of the Inspectors

CEG asks the Inspectors to require Sheffield City Council, before reaching a conclusion on soundness, to:

- Publish a reasoned response to the previously submitted cumulative and site-capacity evidence, including reconciliation of the Council's 1,395-home total for NES37, NES38, NES39 and CH05 with the Alliance's 907-1,026 estimate, and explain the implications for the housing trajectory and anticipated affordable housing delivery across all four sites.
- Demonstrate where necessary community facilities would be located, what land and funding would be available, and which enforceable policies or delivery arrangements would secure them.
- Explain precisely how EXAM219 and the updated Sustainability Appraisal affect the assessment of agricultural land at each site, and address the implications for the

farming operations, including their additional landholdings and reasonable alternative sites.

- Respond directly to the Inspectors' EXAM217B strategic logistics concerns and explain the relationship with the emerging South Yorkshire Spatial Development Strategy; reconcile October 2026 commercial availability, committed cross-boundary development, realistic jobs and skills benefits, and wider demand with the need for CH03, CH04 and NES36, including FMM31's access and mitigation footprint.
- Provide an integrated, plan-level assessment of cumulative transport, ecological, drainage, residential-amenity and construction impacts across housing and employment sites, including NES39's missing site-specific ecological assessment and a credible strategic approach to overlapping works over a potential 17-year development period.
- Identify the Council's response to unresolved concerns from the earlier consultation and explain whether further assessment, modification or a defined pause is needed before these Green Belt releases can be found justified and effective.

CEG represents residents across Chapeltown, Ecclesfield and Grenoside who are deeply concerned about the lasting consequences of these proposals for their communities. We recognise the need for a Local Plan that delivers homes and jobs in the right places, but we cannot support irreversible Green Belt release where the cumulative impacts are substantial, essential infrastructure is not secured, relevant evidence remains outstanding and the claimed benefits have not been convincingly demonstrated. Our residents deserve a Plan based on complete and transparent evidence, which properly considers their needs, protects their environment and commands their confidence. Sheffield City Council must take responsibility for its decisions and address these concerns before the allocations are treated as settled.

CH03: Warren Lane

Submitted by: Chapeltown, Ecclesfield & Grenoside Save Our Green Belt Action Group (CEG)

Consultation references:

- **Updated Integrated Impact Assessment/Sustainability Appraisal, September 2026**
- **EXAM219: Site Selection Addendum: Updated Agricultural Land Classification Data**

Previous representation: MM459: CH03, March-May 2026 Main Modifications consultation.

1. Purpose and scope of representation

CEG objects to the conclusions of the updated Integrated Impact Assessment/Sustainability Appraisal insofar as they relate to the continued justification for allocating CH03 for employment development.

We recognise that no Further Main Modification specifically changes the CH03 allocation. Our representation therefore concerns the new agricultural land evidence and whether the Council has adequately reconsidered its implications for the site-selection decision.

Our previous MM459 representation addressed Green Belt, landscape, transport, ecology, infrastructure and deliverability concerns. We do not seek to reopen those objections. We refer to relevant earlier evidence only to test whether the planning balance remains robust in light of the updated assessment.

2. Updated agricultural land evidence: EXAM219 and Sustainability Appraisal

The updated DEFRA predictive Agricultural Land Classification (ALC) data was not available when the additional Green Belt allocations were originally selected. Unlike the earlier data, the updated mapping distinguishes Grade 3a from Grade 3b agricultural land. Grades 1, 2 and 3a are classified as Best and Most Versatile (BMV) agricultural land.

For CH03, the Council's agricultural land assessment has changed from: Neutral (-) → Higher-quality agricultural land (N).

This is a less favourable assessment of the site for development than the evidence available at the time of selection. It identifies potential loss of higher-quality agricultural land which was not adequately reflected in the original assessment.

We recognise that predictive ALC mapping does not establish the precise grade of every part of CH03 and is not a substitute for a detailed site survey. Nevertheless, it is now part of the Council's own comparative evidence base and must be given appropriate weight.

The updated appraisal concludes that the original site-selection outcomes remain appropriate. CEG questions whether this conclusion has been sufficiently demonstrated for CH03, rather than merely restated following the change in evidence.

3. Working farmland, national policy and reasonable alternatives

CH03 is currently used for agriculture. Our previous representation explained that the land supports a farming operation, including grazing and livestock feed. Its permanent conversion to employment use would therefore involve the loss of working farmland as well as the agricultural land resource itself.

National planning policy states that where significant development of agricultural land is demonstrated to be necessary, areas of poorer-quality land should be preferred to those of higher quality. The updated site-selection evidence identifies other candidate sites with poorer predicted agricultural quality, although agricultural quality is not the only factor relevant to selection.

CEG does not suggest that the new ALC classification automatically rules out CH03. We question whether the updated assessment adequately explains why this higher-quality working farmland remains preferable to reasonable alternative employment locations when the new evidence is applied consistently across the candidate sites.

In particular, the Council should explain the weight given to the revised ALC assessment, the consequences for the existing agricultural use, and the comparative reasons for retaining CH03 despite the newly identified harm.

4. Previously identified site constraints and their relevance to the new evidence

Our MM459 representation identified potential constraints associated with the Tankersley Railway Tunnel, overhead electricity infrastructure, nearby residential properties, access arrangements and requirements for buffers and mitigation. These are not new matters arising from EXAM219.

Their relevance to the present consultation is that they may affect the amount of usable employment land that CH03 can deliver, and therefore the benefits weighed against the permanent loss of agricultural land. We do not advance a numerical estimate of the reduction in developable area because a sufficiently evidenced calculation has not been established.

The new agricultural evidence makes the potential environmental cost of the allocation less favourable. CEG therefore questions whether the Council has adequately explained the balance between that revised harm and the employment benefits realistically achievable after site constraints and mitigation are taken into account.

5. Overall conclusion and requested action

CEG considers that the September 2026 evidence raises a material question about the continued justification for CH03. The Council's own assessment now identifies higher-quality agricultural land, yet its decision to allocate the site remains unchanged.

We ask the Planning Inspectors to consider whether the updated Sustainability Appraisal and EXAM219 provide an adequately reasoned justification for retaining CH03 in the light of this new evidence.

Specifically, we request that:

1. Sheffield City Council demonstrates how the change from Neutral (-) to Higher-quality agricultural land (N) has been weighed in the continued selection of CH03 including clear audit trail showing how that change affected CH03's overall assessment, how it was weighted against other criteria and why it did not alter the selection outcome.
2. Sheffield City Council should be required to produce a site-specific, constraints-based developable-area assessment identifying the land realistically available for employment development after accounting for railway infrastructure, overhead electricity infrastructure, access requirements, residential amenity safeguards, ecological mitigation and any necessary landscape buffers. This assessment should demonstrate the realistic developable area and employment floorspace achievable, rather than relying upon the gross allocation area, so that the claimed employment benefits can be properly weighed against the permanent loss of agricultural land. This matters because the claimed benefits of CH03 should reflect deliverable employment floorspace, not simply the gross allocation area
3. Sheffield City Council should identify sites which are reasonable alternatives and have poorer predicted agricultural quality, whether they can meet the same employment needs, and explain why CH03 is still preferred.
4. Inspectors consider the proposed mitigation is sufficiently defined and supported by the relevant policy framework, including any necessary Green and Blue Infrastructure provisions, where reliance upon such mitigation materially affects the assessment of CH03.
5. Update Sustainability Appraisals adequately explaining the relationship between the newly identified agricultural harm and the employment benefits claimed, rather than relying solely upon the conclusions reached before the revised agricultural evidence became available.
6. The assessment lists and explains the consideration of reasonable alternatives, including sites with poorer predicted agricultural quality, and the effect on the existing farming use and the agricultural consequences have been fully considered, including the permanent loss of working farmland and the potential effect upon the existing agricultural holding, as distinct from the agricultural classification of the land alone.
7. The Council should demonstrate, through a transparent and site-specific reassessment, whether the realistic employment benefits of CH03, after allowing for all previously identified site constraints and necessary mitigation, remain sufficient to justify the newly identified agricultural harm. In the absence of such evidence, CEG questions whether the continued allocation of CH03 can be regarded as justified and effective.

CEG submits that the issue is not simply whether CH03 remains capable of accommodating employment development, but whether it remains a justified choice when assessed against reasonable alternatives using the most recent evidence. Where the Council's own assessment now identifies additional agricultural harm, the continued selection of CH03 should be supported by a clear and transparent explanation demonstrating why its benefits continue to outweigh that harm and why reasonable alternatives have not been preferred.

CEG requests that the Inspectors consider whether CH03 should be removed from the proposed employment allocations if the Council cannot demonstrate, through a transparent and proportionate reassessment, that the revised agricultural harm has been adequately considered, that reasonable alternatives have been properly assessed, and that the allocation remains justified and effective or CH03 requires **removing** from the plan to make it **sound**?

CH04: Hesley Wood

Submitted by: Chapeltown, Ecclesfield & Grenoside Save Our Green Belt Action Group (CEG)

Consultation references:

- **FMM31**: CH04 Hesley Wood employment allocation
- **FMM5:** Policy BG1: Biodiversity and Sheffield's Green Network
- **Updated Integrated Impact Assessment/Sustainability Appraisal**, September 2026
- **Consequential Changes to the Policies Map**, September 2026

Supporting evidence: September 2025 Statement of Common Ground between SCC and Rula Developments; previously submitted contamination and mining evidence; SCC Environmental Protection Services response dated 7 October 2026.

1. Purpose and scope

CEG maintains its objection to the proposed allocation of CH04 for employment development.

This representation focuses on FMM31 and whether the updated Sustainability Appraisal adequately assesses the access, remediation and ground remodelling now expressly acknowledged in the proposed allocation wording.

We do not repeat our earlier objections concerning the site's general suitability.

2. FMM31: Has the full extent of development been adequately assessed?

FMM31 confirms that delivering CH04 will require:

- Highway access from Cowley Hill through the Hesley Wood Local Wildlife Site and Urban Green Space.
- Additional ground remediation and remodelling within the Local Wildlife Site, Urban Green Space and Green Belt.
- Measures to minimise and fully compensate for unavoidable harm to the Local Wildlife Site.

Although these requirements were previously recognised during the examination, FMM31 now expressly incorporates them into the allocation wording.

The updated Sustainability Appraisal nevertheless concludes that FMM31 provides additional clarity or detail and does not alter the characteristics or significance of the environmental effects previously identified.

CEG questions whether this conclusion has been adequately demonstrated, given that the works necessary to deliver CH04 extend beyond the Industrial Zone into environmentally sensitive areas.

The September 2025 Statement of Common Ground also records that SCC and Rula Developments had not agreed the allocation boundary and acknowledged that significant remediation and remodelling beyond it might be required.

The Council should therefore demonstrate that its assessment reflects the full extent of the access, remediation and remodelling works, rather than considering only the proposed employment development area.

It should also explain whether reasonable alternatives, including less environmentally damaging access and remediation arrangements, have been adequately considered.

3. Biodiversity: Consistency with FMM5

FMM5 strengthens protection of Sheffield's Green Network and gives priority to biodiversity where conflicts arise between biodiversity objectives and human access on designated wildlife sites.

Although FMM5's reference to human access does not necessarily apply directly to an employment access road, the strengthened biodiversity provisions reinforce the importance of assessing and minimising ecological harm.

FMM31 expressly acknowledges that access will pass through the Local Wildlife Site and that unavoidable harm may require compensation.

CEG questions whether the updated assessment adequately demonstrates that this harm is unavoidable, that reasonable alternatives have been considered, and that the proposed works can be reconciled with the strengthened biodiversity protections.

In particular, the Council should explain how habitat loss, ecological connectivity, the existing buffer and replacement habitat requirements have been assessed.

4. Contamination, mining and ground stability

Reference: FMM31 and Updated Sustainability Appraisal

CH04 has a substantial history of mining, colliery spoil disposal and industrial activity.

The September 2025 Statement of Common Ground acknowledges buried voids, unstable ground and contamination, together with the potential need for significant remediation beyond the allocation boundary. The site also has a substantial mining legacy, with more than 120 recorded mine shafts and the potential for unrecorded entries, making current evidence on ground stability, mine gases, voids and the implications of excavation and remodelling particularly important.

Previous investigations also identified contaminants including hydrocarbons, metals and asbestos-containing material. Historic remediation proposals included a containment/capping approach, including approximately 600mm of cover in relevant areas, rather than unnecessarily disturbing contaminated material. FMM31 now expressly anticipates remediation and remodelling, so the Council should explain how that earlier approach has been reconciled with the works now proposed.

We recognise that these investigations are historical and do not establish the site's present condition.

However, FMM31 now expressly acknowledges ground remediation and remodelling within areas outside the Industrial Zone, potentially involving disturbance of historically contaminated ground.

This raises questions about the potential consequences for contamination pathways, groundwater, surface water and ground stability.

The Council's Environmental Protection Services response dated 7 October 2026 also indicates that it had not located a Council land-contamination assessment specific to CH04 undertaken within the preceding 15 years, although historical contamination reports had been reviewed.

This does not establish that no investigations exist, but it raises questions about the current evidence informing the allocation.

CEG therefore questions whether sufficient current site-specific evidence supports the Sustainability Appraisal's conclusion that the works acknowledged in FMM31 do not alter the significance of the environmental effects.

There is also an evidential gap concerning health and exposure pathways. NHS South Yorkshire ICB has confirmed that it holds no site-specific health-risk or epidemiological assessment for Hesley Wood. This does not establish that contamination has caused harm, but equally the absence of such an assessment cannot establish that no risk exists. The implications of remediation, earth movement and construction for contaminated dust, vapours and potential exposure to neighbouring residents and workers therefore require consideration.

The assessment should also address the transport consequences of the development and remediation works, including the suitability of the proposed access, cumulative HGV movements associated with CH04 and nearby employment uses, and the capacity and condition of the Cowley Lane rail structure/bridge.

We are not suggesting that every remediation detail must be resolved at allocation stage. However, the Council should demonstrate that the necessary works are feasible and that their environmental implications have been adequately assessed.

5. Overall conclusion and requested action

CEG considers that FMM31 raises unresolved questions about whether the updated Sustainability Appraisal adequately assesses the full environmental consequences of delivering CH04.

The modification expressly acknowledges access through protected habitats and additional ground remediation and remodelling beyond the Industrial Zone, while the Sustainability Appraisal concludes that no further detailed assessment is required.

We therefore ask the Planning Inspectors to require SCC to demonstrate:

1. **Environmental assessment:** That the combined effects of access, remediation and remodelling, including works outside the Industrial Zone, have been adequately assessed.
2. **Biodiversity:** That the proposed access and ecological harm have been justified, reasonable alternatives considered, and the requirements of FMM5 appropriately addressed.
3. **Contamination and ground stability:** That sufficient current evidence demonstrates the feasibility and environmental implications of the necessary remediation and remodelling.

4. **Development extent:** That the full area required to deliver CH04 has been adequately identified and assessed, including whether consequential Policies Map changes are necessary.

CEG considers that the evidence accompanying FMM31 does not yet sufficiently demonstrate why the works now expressly acknowledged would have no material implications for the environmental assessment of CH04. We request further justification and, where necessary, additional assessment before the Inspectors determine whether FMM31 is sound.

CEG maintains its opposition to the proposed allocation of CH04 for employment development.

CH05: Land East of Chapeltown Road (Strawberry Fields)

Submitted by: Chapeltown, Ecclesfield & Grenoside Save Our Green Belt Action Group (CEG)

Consultation references:

- **Updated Integrated Impact Assessment/Sustainability Appraisal, September 2026**
- **EXAM219: Site Selection Addendum: Updated Agricultural Land Classification Data**
- **FMM33**: Affordable Housing Monitoring Target
- **EXAM187A**: Affordable Housing Supply Update

Previous representation: MM461: CH05, March-May 2026 Main Modifications consultation; Sheffield Green Belt Alliance Site Capacities Investigation, 5 May 2026, Section 12.

1. Purpose and scope of representation

CEG raises concerns about the conclusions of the updated Integrated Impact Assessment/Sustainability Appraisal insofar as they relate to the continued justification for allocating CH05 for housing.

We recognise that no Further Main Modification specifically changes CH05's allocation or its stated housing capacity. This representation focuses on the new agricultural land evidence, the limits of predictive mapping, the implications of FMM33 for affordable housing monitoring, and whether the updated appraisal adequately explains the continued justification for CH05.

Our earlier MM461 representation addressed the site's landscape, agricultural use, access, drainage, ecology and deliverability. We do not seek to reopen those objections here; relevant earlier evidence is cited only to test the conclusions reached in the new assessment.

2. Updated agricultural land evidence: EXAM219 and Sustainability Appraisal

The updated DEFRA predictive Agricultural Land Classification (ALC) data was unavailable when the additional Green Belt sites were originally selected. The revised dataset enables a more detailed strategic distinction between higher- and poorer-quality agricultural land.

For CH05, the Council's assessment has changed from: Neutral (-) → Poorer-quality agricultural land (YY).

CEG acknowledges that this change is more favourable to the Council's case for allocating CH05. We do not claim that the new predictive evidence establishes CH05 as Best and Most Versatile (BMV) agricultural land.

The updated appraisal explains that predictive ALC mapping is a strategic planning tool and may not establish the actual agricultural grade of an individual field. A site-specific ALC survey could provide more reliable evidence for CH05.

The updated Sustainability Appraisal also changes the Plan-wide assessment for Land and Soils from Neutral to Minor Negative. This does not reverse CH05's more favourable predicted classification, but shows that the updated evidence identifies greater agricultural harm across the Plan overall.

3. Productive working farmland and the need for site-specific evidence

CEG has now received direct written testimony from one of the farmers of Strawberry Fields, the fields there support 3 farming families. The land has been farmed since medieval times, when it formed part of strip fields used for local food production. The farmer reports that historic field topography and hedgerows remain visible; the hedgerows are actively managed to support wildlife. The site also has a history of fruit cultivation, reflected in the local name "Strawberry Fields".

For the farmer in question, Strawberry Fields forms part of an approximately 120-hectare cropping operation spread across Sheffield and neighbouring local authority areas. The farmer describes the site as vital to the viability of their wider mixed farming enterprise. Wheat harvested there provides grain used for seed and as part of the farm's production system supporting cattle that spend summers on rough hill and moorland grazing; the farmer says this grazing alone does not bring the cattle to a sufficient slaughter weight. Straw from the wheat harvest supplies essential winter cattle bedding. Buying equivalent straw would, according to the farmer, be prohibitively expensive. Livestock manure is returned to the fields as fertiliser, creating an integrated crop-and-livestock cycle.

The farmer reports average wheat yields of approximately 3 tonnes per acre, or around 132 tonnes in total from the portio of land him and his brother farm - about 1 tonne per acre more than other land in the business. He describes the field as having some of the best soil across the holding: deeper, stone-free soil allows roots to penetrate further and access moisture, whereas other fields reportedly encounter clay and subsoil at around six inches. He attributes the field's ability to be worked and sown later in autumn, including after rainfall, to its soil characteristics and drainage assisted by the slope towards Nether Lane. He reports that the previous harvest was affected by drought and invasive site testing, but remained their most productive site.

The farmer has recently sown beans and oilseeds as part of crop rotation, with Strawberry Fields the last field to be sown because rain prevented sowing on the farm's heavier clay soils elsewhere. He also reports successful oilseed establishment at Strawberry Fields where other sites have failed: rapid early crop growth is necessary to withstand flea beetle damage. This ability to rotate crops and diversify production is described as fundamental to managing agricultural and commercial risk rather than relying solely on wheat. The farmer states that loss of this land could render the two-family business unviable, potentially causing the cessation of farming across other parts of the approximately 120-hectare operation and a wider loss of food production.

The farmer questions whether the indicative predominantly Grade 3b ALC prediction adequately represents the field's agricultural qualities, while recognising that it is predictive rather than a field survey. The farmer has commissioned soil samples which he says corroborate the description of the land; the actual results should be considered once supplied.

CEG therefore asks whether a detailed, independently undertaken site-specific ALC survey exists or should be commissioned, and how the Council has weighed direct

agricultural evidence and the potential loss of a viable farming system in its updated appraisal.

4. Previously submitted housing-capacity evidence and implications for FMM33

The Sheffield Green Belt Alliance's Site Capacities Investigation, submitted on 5 May 2026 (Section 12), questioned whether CH05 could accommodate the Council's proposed 549 homes after allowing for drainage, internal roads, landscape and ecological mitigation.

The constraint-based estimate was 385-420 homes, compared with the Council's 549: a potential reduction of 129-164 homes. These are previously submitted estimates, not an agreed or verified revised capacity, and do not indicate acceptance of development at a lower number.

This capacity assessment is not new evidence arising from the Further Main Modifications. Its relevance here is to whether the updated Sustainability Appraisal adequately explains the continued justification and deliverability of CH05, taking account of evidence already submitted.

If CH05 delivers fewer than the assumed 549 homes, its potential contribution to overall housing supply and affordable housing may also be lower.

FMM33 revises the Plan-wide affordable housing monitoring target from 5,531 to 5,479 homes, supported by EXAM187A. CH05's proposed capacity remains 549 homes. The previously submitted capacity evidence therefore raises a question about whether the housing and affordable housing benefits attributed to this allocation are realistic.

CEG asks how the updated appraisal and affordable housing evidence have taken account of that uncertainty, without suggesting that the earlier capacity estimate is itself new FMM evidence.

5. Overall conclusion and requested action

Although the updated predictive ALC classification is more favourable to development at CH05, its reliability for these particular fields remains uncertain. The farmer is surprised by the indicative predominantly Grade 3b classification and suspects the slope towards Nether Lane may influence it. His testimony concerning exceptional relative yields, deep stone-free soil, workable autumn conditions, crop rotation, livestock interdependence, historic hedgerows and the business-wide consequences of land loss provides substantive site-specific evidence warranting examination. High yields alone do not establish an ALC grade or BMV status; the classification must be tested using appropriate site-specific evidence. The farmer states that commissioned soil sample results support his account, but those results have not been provided with the material available for this revision and should be reviewed separately.

We ask the Planning Inspectors to consider whether the updated appraisal adequately explains CH05's continued justification and deliverability in light of this uncertainty and the previously submitted capacity evidence.

The Council explains why the revised predictive ALC classification is sufficiently reliable for CH05, whether a site-specific Agricultural Land Classification survey has been undertaken and, if not, why one is not needed in light of the farmer's detailed testimony and any supporting soil samples.

1. The Council explains why the revised predictive ALC classification is sufficiently reliable for CH05 and whether a site-specific Agricultural Land Classification survey is needed.
2. The Council considers the farmer's written testimony and any commissioned soil sample results, including wheat yields (approximately 3 tonnes per acre and 132 tonnes overall), soil depth and drainage, autumn workability, successful oilseed establishment, crop rotation, livestock feed and bedding, manure recycling, historic field patterns and managed hedgerows, the effects of drought and invasive testing, and the potential viability consequences for the two families and the wider approximately 120-hectare farming operation.
3. The Council explains how the previously submitted capacity estimate of 385-420 homes, compared with its assumption of 549, has been considered in assessing CH05's deliverability and potential housing and affordable housing contributions in the context of FMM33 and EXAM187A.

CEG maintains its opposition to the release of CH05 from the Green Belt and requests a clearer, site-specific explanation of why the allocation remains justified.

NES36: Smithy Wood

Submitted by: Chapeltown, Ecclesfield & Grenoside Save Our Green Belt Action Group (CEG)

Consultation references:

- **Updated Integrated Impact Assessment/Sustainability Appraisal, September 2026**
- **EXAM219:** Site Selection Addendum: Updated Agricultural Land Classification Data

Previous representation: MM350: NES36, March-May 2026 Main Modifications consultation.

1. Purpose and scope of representation

CEG questions whether the updated Integrated Impact Assessment/Sustainability Appraisal adequately explains the continued justification for allocating NES36 at Smithy Wood for employment development.

No Further Main Modification specifically changes NES36. This representation focuses on the new predictive agricultural land evidence and whether it has been appropriately weighed alongside the site's previously identified constraints.

Our earlier MM350 representation addressed the ancient woodland setting, ecology, mining, contamination, agricultural use and deliverability. We refer to those matters only insofar as they affect the weight to be given to the updated evidence, rather than reopening the previous objections.

2. Updated agricultural land evidence: EXAM219 and Sustainability Appraisal

The updated DEFRA predictive Agricultural Land Classification (ALC) data was unavailable when the additional Green Belt sites were originally selected. It distinguishes Grade 3a from Grade 3b land, but remains a strategic prediction rather than a definitive survey of individual fields.

For NES36, the Council's assessment has changed from: Neutral (-) → Poorer-quality agricultural land (YY).

The same "YY" rating is applied to urban redevelopment where no agricultural land is lost and to NES36, where working farmland and its soil functions would be permanently lost. Although both may avoid the loss of best and most versatile agricultural land, their effects are different. The appraisal should explain this distinction when comparing NES36 with reasonable alternatives.

CEG acknowledges that this change is more favourable to development in agricultural land-quality terms. It does not, however, establish that the land has no productive agricultural value or remove the site's other physical and environmental constraints.

The updated appraisal retains the original site-selection outcome. CEG asks how the Council has assessed the revised classification in the context of NES36's existing agricultural use and

previously identified constraints, rather than treating the improved agricultural score as resolving wider suitability questions.

The Plan-wide Land and Soils assessment also changes from Neutral to Minor Negative. This is a cumulative finding, not a deterioration in NES36's own agricultural score, and should not be presented as such.

3. Working farmland and the limitations of predictive classification

The residents' evidence describes NES36 as working farmland used by a beef farmer for cattle grazing and hay production for winter feed, supporting a herd reported to number approximately 75 cattle. This account is based on local information and would benefit from direct confirmation by the farmer.

The farmer has publicly stated that his family have farmed this land for over 100 years and that the loss of the land will have a serious impact on the viability of the farm. The consequences could therefore extend to the total loss of Butterthwaite Farm which equates to approximately 31 hectares of additional agricultural land**.**

Previous representations also identified cattle-rearing activity on adjoining farmland. Predicted agricultural grade alone does not show the contribution of these fields to the existing farming operation or the practical consequences of losing them.

CEG therefore asks whether the updated appraisal gives adequate weight to the land's existing productive use when considering the revised agricultural assessment.

4. Previously identified constraints and realistic employment land yield

NES36 directly adjoins Smithy Wood Ancient Woodland. Earlier evidence raised concerns about ecological connectivity, woodland buffers, mining legacy and contamination. These are previously submitted matters, not new effects established by the updated agricultural mapping.

The allocation boundary was reduced during the examination. Earlier representations questioned how much usable employment land would remain once woodland and ecological buffers, ground conditions, access arrangements, neighbouring uses and necessary mitigation were allowed for.

The Council should explain the realistic net developable employment area and the assumptions used to derive it. No percentage reduction is asserted here without a substantiated site-specific calculation.

The relevance of these established constraints to the present consultation is the weight that can reasonably be placed on the site's anticipated employment benefits when the revised agricultural evidence is considered. A more favourable predicted soil-quality score does not establish that the allocation is deliverable.

5. Overall conclusion and requested action

Although the revised predictive agricultural classification is more favourable to development, it does not itself demonstrate that the loss of this working farmland has been adequately assessed or that the proposed employment benefits are achievable.

CEG asks the Planning Inspectors to consider whether the updated Sustainability Appraisal and EXAM219 adequately explain the continued selection of NES36 in light of the new agricultural evidence and the constraints already before the examination.

Specifically, we request that:

1. The Council explains how the revised predictive ALC classification has been weighed and whether the existing agricultural use and consequences of permanent land loss have been considered.
2. The Council identifies the realistic net developable employment area, with supporting assumptions for ecological buffers, mining and ground conditions, access and necessary mitigation.
3. The Council explains how the employment benefits realistically achievable at NES36 have been weighed against the agricultural loss, and why NES36 remains preferable to reasonable alternative employment locations on the evidence now available.

CEG maintains its objection to the release of NES36 from the Green Belt. The present request is for a transparent explanation of the continued allocation in response to the updated evidence.

NES37: Creswick Avenue / Yew Lane

Submitted by: Chapeltown, Ecclesfield & Grenoside Save Our Green Belt Action Group (CEG)

Consultation references:

- **FMM33**: Affordable Housing Monitoring Target
- **Updated Integrated Impact Assessment/Sustainability Appraisal, September 2026**
- **EXAM219**: Site Selection Addendum: Updated Agricultural Land Classification Data
- **EXAM187A**: Affordable Housing Supply Update

Previous representation: MM351: NES37, March-May 2026 Main Modifications consultation.

1. Purpose and scope of representation

CEG objects to the conclusions of the updated Integrated Impact Assessment/Sustainability Appraisal insofar as they relate to the continued justification for allocating NES37. We also raise concerns about the implications of FMM33 and the corrected affordable housing figures in EXAM187A.

We recognise that the NES37 allocation and its stated capacity of 592 homes are not themselves changed by the current Further Main Modifications. Our previous MM351 representation addressed ecology, transport, infrastructure, agricultural use and deliverability. We do not repeat those objections; we refer to earlier evidence only where it bears on the new assessments.

2. Updated agricultural land evidence: EXAM219 and Sustainability Appraisal

EXAM219 confirms that updated DEFRA predictive Agricultural Land Classification data was unavailable when the additional Green Belt sites were originally selected. For NES37, the assessment changes from Neutral (-) to Higher-quality agricultural land (N), representing a less favourable assessment of the site for development.

The September 2026 Sustainability Appraisal also changes the Land and Soils assessment for the wider Grenoside/Ecclesfield housing location from Minor Negative to Moderate Negative, identifying substantial areas of Grade 2 and Grade 3a Best and Most Versatile (BMV) agricultural land. The Plan-wide Land and Soils assessment changes from Neutral to Minor Negative.

Although predictive mapping does not establish the precise grade of individual parcels, the updated evidence identifies greater agricultural harm. CEG questions whether the continued selection of NES37 has been adequately justified against reasonable alternatives on poorer-quality land.

Town End Farm is farmed by Adele and Andrew Riddle and comprises approximately 30.3 hectares, predominantly used for grazing a suckler herd of approximately 70 cattle, grass conservation and some arable production for animal feed. The farm provides the secure grazing, water supply, housing and handling facilities essential to the cattle operation, including facilities needed for calving, animal welfare and statutory testing.

The Riddles also farm approximately 40 hectares of additional land, predominantly in the Grenoside and Ecclesfield area, which they believe to be Grade 2 and 3a agricultural land. This is consistent with the Council's updated evidence identifying substantial areas of higher-quality agricultural land within the wider Grenoside/Ecclesfield housing location. However, this additional land cannot accommodate their cattle because it lacks secure grazing, water supplies, handling facilities and proximity to Town End Farm. Losing Town End Farm would therefore mean abandoning cattle farming. The Riddles explain that the remaining arable operation would be too small to remain economically viable, particularly given machinery costs.

The farmers also undertake regular hedgerow management, including trimming, traditional hedge laying and replanting where necessary, despite this not being a requirement of their tenancy. This voluntary work helps maintain established hedgerows and secure field boundaries, contributing to the management of the agricultural landscape.

The farmers' evidence indicates that the consequences of developing NES37 could extend beyond the loss of agricultural land to the viability of the wider farming business.

CEG asks whether these consequences have been adequately considered alongside the higher-quality agricultural land now identified in EXAM219 and the revised Sustainability Appraisal.

3. Affordable housing: FMM33 and EXAM187A

FMM33 reduces the Plan-wide affordable housing monitoring target from 5,531 to 5,479 homes. EXAM187A corrects NES37’s anticipated baseline affordable housing contribution from 183 to 178 homes, a reduction of five.

The corrected affordable housing contribution is relevant to the balance of benefits and harms, particularly alongside the newly identified agricultural harm.

CEG questions whether the combined implications have been adequately explained in the updated appraisal.

4. Previously submitted capacity evidence and its relevance to FMM33

The Sheffield Green Belt Alliance submitted its Site Capacities Investigation on 5 May 2026. For NES37, it questioned whether 592 homes can realistically be delivered alongside the land required for education and burial provision, ecological and landscape mitigation, watercourse protection, footpaths, access and infrastructure. Ecological and Biodiversity Net Gain assessments have been undertaken for NES37 and form part of the existing evidence.

SCC proposed capacity: 592 homes. Previously submitted constraint-based estimate: 354-413 homes. Potential reduction: 179-238 homes.

These estimates were submitted during the earlier Main Modifications consultation; they are not new evidence arising from FMM33. They are relevant here because the corrected affordable housing contribution in EXAM187A continues to depend on the Council’s capacity assumptions. If the developable capacity is materially lower, the housing and affordable housing benefits could be lower too. The estimate is not an endorsement of development at a reduced capacity.

The September 2026 Appropriate Assessment Review does not establish that NES37 can accommodate the proposed development without unacceptable effects on the Field at Yew Lane Local Wildlife Site and its wider ecological network. The Council must demonstrate that

the strengthened biodiversity requirements in FMM5 can be met while protecting the watercourse, woodland, veteran trees and ecological connectivity associated with the site. These constraints must inform the assessment of the land realistically available for housing, rather than being left to future planning applications or Biodiversity Net Gain calculations after the proposed capacity of 592 homes has already been assumed.

5. Overall conclusion and requested action

The revised agricultural assessment, corrected affordable housing contribution and existing capacity evidence together raise questions about whether the benefits and harms of NES37 have been adequately assessed. We ask the Inspectors to examine whether the updated Sustainability Appraisal and FMM33 assessment sufficiently explain the continued justification for this allocation.

Specifically, we request that:

1. The Council explains how NES37's revised agricultural assessment and the wider deterioration in Land and Soils have been weighed, including consideration of reasonable alternatives on poorer-quality land.
1. The Council considers the evidence provided by the farmers of Town End Farm, including the dependence of their cattle operation on the land and facilities at NES37, and explains whether the potential loss of the wider farming business has been adequately assessed alongside the revised agricultural evidence.

2. The Council explains how the corrected affordable housing contribution, previously submitted constraint-based capacity evidence and the ecological requirements of FMM5 have been taken into account when assessing the benefits, environmental acceptability and deliverability of NES37.

CEG maintains its opposition to the release of NES37 from the Green Belt. The updated evidence raises unresolved questions about whether the allocation remains justified and effective.

NES38: Holme Lane Farm / Land West of Grenoside Grange

Submitted by: Chapeltown, Ecclesfield & Grenoside Save Our Green Belt Action Group (CEG)

Consultation references:

- **FMM28**: revised NES38 site boundary and access
- **FMM5**: Policy BG1, biodiversity and green network
- **Updated Integrated Impact Assessment/Sustainability Appraisal, September 2026**
- **EXAM219**: Site Selection Addendum: Updated Agricultural Land Classification Data
- **FMM33**: Affordable Housing Monitoring Target
- **EXAM187A**: Affordable Housing Supply Update

Previous representation: MM352: NES38, March-May 2026 Main Modifications consultation.

1. Purpose and scope of representation

CEG questions whether NES38 remains justified and deliverable in light of FMM28, which enlarges the allocation for road access, and the updated agricultural land evidence. FMM5 also raises a specific issue concerning protection of the Local Wildlife Site within the allocation.

This representation addresses the new modification and supporting assessments. Previously raised concerns about drainage, ecology and capacity are included only where they bear directly on the implications of FMM28 or FMM5.

2. FMM28: site enlargement for road access

FMM28 increases the gross allocation from 6.70 to 6.80 hectares and the net housing area from 5.38 to 5.44 hectares. The stated purpose is “to allow appropriate road access within the site”. The proposed housing capacity remains approximately 188 homes.

The Sustainability Appraisal screening states that “Access was presumed in the appraisal” and concludes that no significant effects are likely. Yet FMM28 expressly enlarges the allocation to allow appropriate road access. CEG questions whether the original appraisal adequately established access feasibility and whether the revised appraisal demonstrates that the required access can now be provided without additional environmental or capacity consequences.

The net housing area increases by only 0.06 hectares. This small change does not itself demonstrate that safe and suitable access, internal roads, drainage infrastructure, SuDS and ecological safeguards can all be accommodated while retaining approximately 188 homes. The Council’s response of 2 July 2026 described inclusion of the relevant turning-area land as necessary for effectiveness. CEG has not identified a newly published NES38-specific layout showing the complete Salt Box Lane access route, junction and turning feasibility, gradients, road width or actual highway land-take; this does not assert that no such design exists. CEG also seeks clarification on how the relevant provisions of FMM7 would apply to the protection of the existing dry-stone boundary and mature tree line, should these features be affected by the revised access arrangements. CEG’s community Tree & Hedgerow Audit (23 March 2026) identified veteran trees, including three at a proposed Salt Box Lane access location; the audit

is not a substitute for a professional arboricultural assessment and does not prove that a final alignment would harm them. CEG asks the Council to publish proportionate site-specific access and layout evidence, including how mature and veteran trees, hedgerows and boundary features would be retained or protected, and demonstrate access to the proposed housing areas without assuming vehicular passage through Cowper Avenue Greenspace LWS.

3. Updated agricultural land evidence: EXAM219 and Sustainability Appraisal

The updated DEFRA predictive Agricultural Land Classification evidence changes both constituent parcels of NES38, Holme Lane Farm and land west of Grenoside Grange, from Poorer-quality agricultural land (YY) to Higher-quality agricultural land (N). This evidence was not available when the additional sites were originally selected.

The Land and Soils assessment for the wider Grenoside/Ecclesfield strategic housing location also changes from Minor Negative to Moderate Negative. The new classification is predictive, not a site-specific soil survey; nevertheless, both parcels now score less favourably for development in the Council's comparative evidence.

National policy indicates that where significant development of agricultural land is necessary, poorer-quality land should be preferred to higher-quality land. EXAM219 acknowledges that 28 sites which were not shortlisted and had no identified fundamental constraints are now assessed as poorer-quality agricultural land. Although the Council maintains that these sites remain less suitable when other planning considerations are taken into account, CEG questions whether the updated evidence has been sufficiently reflected in the comparative assessment. The Council should demonstrate why NES38 remains preferable to genuinely reasonable alternatives, considering agricultural quality alongside the full range of sustainability, access and deliverability factors.

4. Drainage, capacity and biodiversity: relevance to FMM28 and FMM5

Earlier representations identified constraints involving Cowper Avenue Greenspace Local Wildlife Site, veteran trees and buffers, topography, drainage and access. Their relevance here is whether FMM28 genuinely enables the necessary access without undermining the allocation's proposed capacity or its environmental safeguards.

The documentary evidence is more specific than a general concern. Correspondence headed "49755 - Holme Lane Farm, Grenoside - SW discharge", disclosed with SCC's formal response EIR/2146296 dated 25 September 2026, records the Council Flood & Water Development Officer's site visit of 17 June 2025. The officer identified a clearly defined natural valley, an apparent culverted watercourse (described by reference to an attached historic sketch), and physical evidence of exceedance flows crossing the footpath towards Grimsell Close, including sandbags and wrack. A possible inlet obstruction or maintenance issue was identified for checking. The officer indicated that discharge at Qbar was likely acceptable in principle, not that a completed scheme had been approved. The historic Grimsell Close drainage letter and plan dated January 1962 also record earlier drainage and pipe-blockage issues; they do not establish the culvert's current condition. SCC's formal EIR response confirms that, at the date of its response, no drainage strategy, surface-water flood-risk assessment or SuDS design had been submitted to the LLFA, no further detailed LLFA/Council assessment had been carried out, and no SuDS maintenance/adoption agreement existed. SCC also identifies the site as Flood Zone 1 with very low mapped surface-water risk. CEG does not claim that the site cannot

be drained. Rather, it asks the Council to demonstrate how the revised FMM28 access, existing valley and culvert, drainage infrastructure, SuDS, housing and ecological safeguards fit together without displacing one another, increasing risk to neighbouring properties or undermining the assumed capacity.

The Sheffield Green Belt Alliance submitted its Site Capacities Investigation on 5 May 2026. For NES38, it estimated a constraint-based capacity of approximately 130-152 homes, compared with the Council's 188 homes (a potential shortfall of 36-58). This estimate considered existing physical and environmental constraints; it is previously submitted evidence, not a new finding arising from FMM28 or FMM33.

FMM33 reduces the Plan-wide affordable housing monitoring target from 5,531 to 5,479 homes, supported by EXAM187A. Unlike NES39, no NES38-specific correction has been established in the material reviewed. However, if NES38 delivers fewer homes than assumed, its contribution to housing and affordable housing supply may also be lower. CEG asks the Council to explain whether the assumptions underlying the revised affordable housing monitoring target have been tested against the previously submitted NES38 capacity evidence, and whether any resulting uncertainty could affect the housing and affordable housing contributions attributed to this allocation.

FMM5 strengthens Policy BG1 by prioritising biodiversity protection and enhancement where biodiversity objectives conflict with human access on designated wildlife sites. Cowper Avenue Greenspace Local Wildlife Site lies within NES38. CEG questions how any proposed pedestrian or cycle connection affecting the site would comply with this strengthened policy and the previously identified restriction on development within the Local Wildlife Site.

5. Overall conclusion and requested action

CEG considers that FMM28 and the updated agricultural evidence raise significant questions about the continued justification and deliverability of NES38. The Council should demonstrate that the revised access arrangements are feasible, that the newly identified agricultural harm has been properly weighed, and that the assumed housing benefits remain credible.

1. The Council demonstrates, through proportionate site-specific evidence, that the complete access arrangements under FMM28 are feasible alongside the existing valley and culvert, drainage, SuDS and ecological mitigation; clarifies treatment of the FMM7 dry-stone boundary and tree line and the community-audited veteran trees; and explains whether the assumed 188-home capacity remains realistic in light of the previously submitted 130-152-home estimate.
2. The Council explains how the revised agricultural assessment for both parcels, the wider Land and Soils effects and reasonable alternatives have been considered in retaining NES38.
3. The Council explains how FMM5 and Local Wildlife Site protections would apply to proposed connections affecting Cowper Avenue Greenspace, and how uncertainty over housing capacity has been considered in the assessment supporting FMM33 and EXAM187A.

CEG maintains its objection to the release of NES38 from the Green Belt. These requests concern the new modifications and evidence, not a general reopening of previous representations. Drainage evidence cited: SCC EIR/2146296 (25 September 2026), including disclosed correspondence headed 49755 (17 June 2025) and the attached historic Grimsell Close drainage letter and plan (January 1962). Contains public sector

information obtained from Sheffield City Council and licensed under the Open Government Licence v3.0.

NES39: Wheel Lane / Middleton Lane

Submitted by: Chapeltown, Ecclesfield & Grenoside Save Our Green Belt Action Group (CEG)

Consultation references:

- **FMM33**: Affordable Housing Monitoring Target
- **Updated Integrated Impact Assessment/Sustainability Appraisal**, September 2026
- **EXAM219**: Site Selection Addendum: Updated Agricultural Land Classification Data
- **EXAM187A**: Affordable Housing Supply Update
- **FMM5:** Biodiversity requirements

Previous representation: MM353: NES39, March-May 2026 Main Modifications consultation.

1. Purpose and scope of representation

CEG objects to the conclusions of the updated Integrated Impact Assessment/Sustainability Appraisal insofar as they relate to the continued justification for allocating NES39.

We also raise concerns about the implications of FMM33 and the corrected affordable housing figures in EXAM187A.

We recognise that NES39's allocation and housing capacity are not themselves being modified through the current consultation.

Our previous MM353 representation addressed the site's landscape, ecology, heritage, highways, infrastructure and deliverability constraints. We do not repeat those objections here.

Instead, this representation addresses whether the new evidence published for the Further Main Modifications consultation has been adequately reflected in the assessment of NES39.

2. Updated agricultural land evidence: EXAM219 and Sustainability Appraisal

EXAM219 confirms that the updated DEFRA predictive Agricultural Land Classification data was unavailable when the additional Green Belt sites were originally selected.

For NES39, the agricultural land assessment has changed from: Neutral (-) → Higher-quality agricultural land (N)

This represents a less favourable assessment of NES39 than the evidence available when the site was selected.

The September 2026 Sustainability Appraisal also identifies greater harm to Land and Soils within the wider Grenoside/Ecclesfield housing location. The assessment has changed from: Minor Negative → Moderate Negative

The updated evidence identifies substantial areas of Grade 2 and Grade 3a agricultural land within this wider location, both classified as Best and Most Versatile agricultural land.

We recognise that predictive agricultural land data does not establish the precise agricultural classification of every part of NES39. Nevertheless, the Council's own updated evidence now identifies greater agricultural harm than was previously understood.

EXAM219 concludes that the original site-selection decisions remain justified. The updated Sustainability Appraisal similarly concludes that the proposed strategy and allocations remain appropriate.

CEG questions whether these conclusions have been adequately demonstrated for NES39, given that the new evidence identifies higher-quality agricultural land within the site and greater adverse effects on Land and Soils across the wider Grenoside/Ecclesfield area.

In particular, we question whether the updated appraisal has given sufficient consideration to the national planning policy preference for poorer-quality agricultural land where significant agricultural development is necessary, and whether the justification for selecting NES39 over reasonable alternatives remains robust.

3. Affordable housing: FMM33 and EXAM187A

FMM33 reduces the Plan-wide affordable housing monitoring target from 5,531 to 5,479 homes, reflecting corrected site capacities.

EXAM187A confirms that the expected baseline affordable housing contribution from NES39 has been corrected as follows:

NES39 affordable housing	Homes
Previous figure	44
Updated figure	20
Reduction	*24*

This represents a reduction of approximately 55%.

We acknowledge that the correction reflects the earlier reduction in NES39's proposed housing capacity from approximately 148 to 66 dwellings under MM353. FMM33 does not introduce a further reduction in NES39's allocation.

Nevertheless, the corrected figures formally establish that the affordable housing contribution associated with NES39 is substantially smaller than previously presented.

Affordable housing is an important benefit associated with the proposed release of Green Belt land.

CEG questions whether the assessment supporting FMM33 adequately considers the implications of the corrected affordable housing contribution from NES39 alongside the newly identified agricultural harm.

We note that the Sustainability Appraisal's screening of FMM33 concludes that the capacity corrections are insufficient to materially alter its appraisal findings.

However, the NES39 correction is substantial at the individual site level, and the updated agricultural evidence independently makes the environmental assessment less favourable.

We therefore consider that the combined implications warrant a clearer explanation.

4. Previously submitted capacity evidence and its relevance to FMM33

The Sheffield Green Belt Alliance submitted its *Site Capacities Investigation* on 5 May 2026.

For NES39, the assessment questioned whether the Council's proposed capacity of 66 homes could realistically be achieved once the site's known constraints were taken into account.

Housing capacity	Homes
SCC proposed capacity	66
Constraint-based estimate	38-41
Potential reduction	25-28

The assessment considered constraints including Local Wildlife Site buffers, hedgerows and heritage features.

We acknowledge that this evidence was submitted during the previous Main Modifications consultation and is not new evidence arising from FMM33.

We do not seek to reopen those earlier objections. Its relevance to the current consultation is that EXAM187A's corrected affordable housing contribution for NES39 remains based on the delivery of 66 homes.

If the site's developable capacity proves materially lower, its contribution to both housing and affordable housing supply would be further reduced.

We therefore question whether the assessment of FMM33 has adequately considered the uncertainty surrounding the capacity assumptions on which the revised affordable housing figures depend.

At the examination hearing on 21 November 2025, the Inspector identified important differences between the landscape characteristics of the three original NES39 parcels, particularly the greater sensitivity of Parcels B and C. These observations provide context for the subsequent reduction of the allocation to Parcel A. However, its more contained landscape setting does not establish that it can accommodate 66 homes without unacceptable ecological, landscape or heritage impacts. Of particular concern is the absence of a published site-specific Preliminary Ecological Appraisal (PEA) and Biodiversity Net Gain (BNG) assessment, despite the site's proximity to a Local Wildlife Site. CEG questions whether sufficient evidence exists to identify any priority or irreplaceable habitats and assess potential direct and indirect effects, including habitat deterioration.

In light of FMM5's strengthened biodiversity requirements and the previously identified ecological, heritage and landscape constraints, CEG questions how the Council can continue to justify an allocation of 66 homes without publishing the site-specific evidence necessary to establish its realistic developable capacity. The absence of a published Preliminary Ecological Appraisal and Biodiversity Net Gain assessment raises fundamental questions about whether the allocation can be delivered without unacceptable environmental harm. It is for the Council to demonstrate that the proposed capacity is justified and deliverable, not for residents to establish that it is unachievable. Until these matters are resolved, CEG considers that neither

the assumed housing capacity nor the associated affordable housing benefits can be relied upon as adequately evidenced justification for releasing this Green Belt land.

5. Overall conclusion and requested action

CEG considers that the September 2026 evidence raises an important question about the continued justification for NES39.

The updated agricultural evidence identifies greater environmental harm, while the corrected affordable housing figures confirm a substantially smaller contribution from the allocation.

Although the Council concludes that these changes do not alter the overall appraisal findings, we do not consider that the implications for NES39 have been sufficiently explained.

We therefore ask the Planning Inspectors to consider whether the updated Sustainability Appraisal and the assessment supporting FMM33 provide adequate justification for their conclusions in relation to NES39.

Specifically, we request that:

1. The Council demonstrates how the revised agricultural land assessment has been considered in reaching its conclusion that NES39 remains justified, including the consideration of reasonable alternatives.
2. The combined implications of the revised agricultural assessment and reduced affordable housing contribution are addressed.
3. The Council demonstrates that NES39's assumed capacity of 66 homes, and the associated housing and affordable housing contributions in EXAM187A, remain achievable in light of the previously submitted capacity evidence, the absence of published site-specific ecological assessments and the strengthened biodiversity requirements in FMM5.

CEG maintains its opposition to the release of NES39 from the Green Belt. We consider that the updated evidence raises unresolved questions about whether the allocation remains justified and effective.