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**Date:** 28th October 2026

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Sent via email

Dear Michael,

**Sheffield Plan: Further Main Modifications and additional associated documents**

1.1 As the examination now enters its 4th year (submission October 2023), James Bailey Planning Ltd ('JBPL') again writes on behalf of its client, Sheffield Green Belt Alliance ('SGBA')[1], in respect of the 'Further Main Modifications and additional associated documents' consultation exercise on the draft Sheffield Local Plan ('Plan'). JBPL responded to the previous Main Modifications consultation on behalf of SGBA, and previous exercises on behalf of Save S13 Green Belt – The Sapphire McCarthy Campaign. This letter should be read alongside our previous representations of: 5th May 2026 ('**May 2026 Letter'**, REF5.0467); 11th July 2025 ('**July 2025 Letter**', REF1.1902); and 11th December 2025 ('**December 2025 Letter**', REF3.0618). The points made in those representations continue to stand.

1.2 This letter makes comments in respect of three areas: the Further Main Modifications ('FMM'); the updated IIA/Sustainability Appraisal; and relevant additional associated documents forming part of the consultation. The structure of this letter is as follows.

[1] *An alliance of community action groups comprising: S12 Green Belt Action Group; Save Chapeltown, Ecclesfield & Grenoside's Greenbelt Community Campaign; Save Land at Lodge Moor Road & Redmires Conduit Action Group; and Save S13 Green Belt: The Sapphire McCarthy Campaign.*

## Table of Contents


2. Further Main Modifications ..... 3

FMM3: Transport mitigation and developer contributions ..... 3

FMM5: Ecological Networks ..... 3

FMM27 and FMM30: Removal of agricultural land survey requirements ..... 4

FMM33: Affordable housing ..... 6

3. IIA / Sustainability Appraisal ..... 6

Agricultural Land ..... 7

Reasonable alternatives and site selection ..... 9

Strategic Locations and overall assessment of effects ..... 11

4. Additional Associated Documents ..... 13

EXAM130C: Promoted urban sites and wider urban capacity ..... 13

EXAM187A: Affordable housing supply update ..... 15

EXAM221: Alternative access option for SES29 ..... 15

EXAM222: SES30 and the Quaker burial and preaching grounds ..... 16

Yorkshire Water infrastructure evidence ..... 17

5. Conclusion ..... 17

## 2. Further Main Modifications

FMM3: Transport mitigation and developer contributions

2.1 The replacement of the reference to a supplementary planning document with 'planning guidance' does not address the concerns raised in our May 2026 Letter regarding the identification, cumulative cost and funding of necessary transport mitigation. Those matters require sufficient certainty to underpin the delivery assumptions for the proposed allocations. Leaving an assessment of necessary contributions until after allocation risks relying on site capacities and delivery timescales that have not been tested against the full cost of the infrastructure required. This brings into question the effectiveness of the Plan. [**July 2025 Letter, para. 3.17; and May 2026 Letter, paras. 2.29-2.31**]

FMM5: Ecological Networks

2.2 FMM5 removes wildlife corridors and 'stepping stones' from the features expressly given 'very significant weight' under BG1. The replacement wording instead provides that connections should be maintained or enhanced 'where possible'. We recognise the Inspectors' concern about the uncertain extent of these areas (EXAM217C, paras. 12-15). However, paragraph 179(a) of the September 2023 NPPF requires plans to identify, map and safeguard the wider ecological network, including links between designated sites.

2.3 The revised Map 17 accompanying MM103 (Main Modifications schedule, p.139) does not separately identify these connecting habitats. The Council should have mapped the existing network and explain how BG1 and GS5 safeguard it, including areas without wildlife designations. The gaps in the mapping and policy wording need to be resolved before the plan is recommended for adoption. Identifying opportunities for future nature recovery does not, by itself, show that existing habitats are adequately protected.

FMM27 and FMM30: Removal of agricultural land survey requirements

2.4 We object to FMM27 and FMM30. These modifications would remove the requirements for agricultural land surveys at NWS31 and SES10, respectively, to determine whether the land is Grade 3a and ensure consistency with Policy GS4. The stated justification is 'For consistency with other similar site allocations'. That is inadequate because it perpetuates the concern identified in our **May 2026 Letter (paras. 2.32-2.41 and 3.13-3.15)**: whether the agricultural consequences of the proposed allocations have been sufficiently established to justify dispensing with the requirement to undertake further investigation and assessment.

2.5 The Inspectors' position in EXAM217C required further assessment of allocations and reasonable alternatives using the updated agricultural land classification ('ALC') evidence, including an explanation of whether poorer-quality land had been selected and, where it had not, why the proposed allocations remained justified. Paragraph 22 of EXAM217C expressly made deletion of the remaining survey requirements conditional upon determining that their omission was justified, having considered the further assessment. We do not consider that the Inspectors' requirements have been satisfied.

2.6 EXAM219 records that NWS31 has changed from a positive agricultural land assessment ('YY'), indicating poorer-quality land, to a minor negative assessment ('N'), indicating potential best and most versatile ('BMV') agricultural land. SES10 has changed from neutral to minor negative (Appendices 3 and 1, respectively). Illogically, the Council therefore proposes to remove the survey requirements from two sites whose predicted agricultural assessments have *worsened*. In the case of NWS31, the earlier assumption that the land was of poorer quality has been entirely reversed and this change demands a convincing explanation of the implications for allocation and development; it provides no justification, of itself, for dispensing with a requirement for further investigation.

2.7 EXAM219 acknowledges that the dataset is a strategic tool suitable for high-level planning, but not necessarily determinative at individual parcel level (para. 1.2). Natural England's published guidance likewise explains that the predictive maps are not sufficiently detailed or

accurate to assess individual fields or sites, and that a detailed survey may be necessary where suitable survey information is unavailable[2]. Nevertheless, what the predictive ALC maps do do is provide an indication of where BMV is likely to be present, and on an improved basis from the previous 'provisional' datasets. The distinction between predicted land quality and an adequately evidenced assessment of the land affected cannot simply be disregarded when deciding that an express survey requirement is no longer needed; in fact, the opposite should be the case.

2.8 This must also be considered alongside MM184, which would amend Policy GS4 so that allocation provides an express basis for permitting development on BMV land. Its stated justification is that agricultural land value has already been considered when selecting the site. Yet the February 2026 IIA recorded insufficient survey information for consistent appraisal of individual sites (Appendix F, pp. 235-236). The Council now relies on revised predictive scores while removing the requirements intended to establish land quality more precisely. The allocation cannot itself demonstrate that the agricultural harm has been adequately assessed. To rely upon it in that way is circular. We have made this circularity point before, in our **July 2025 Letter, paras. 4.39-4.43**; **May 2026 Letter, paras. 2.39 and 3.15**.

2.9 EXAM219 neither quantifies the anticipated BMV loss by grade nor adequately distinguishes its significance between sites. The comparison with alternatives must also reflect the greater harm now predicted at preferred allocations; repeating the original rejection reasons does not establish that the balance remains unchanged. These deficiencies, and their implications for the preference for poorer-quality agricultural land in footnote 58 to the NPPF, are addressed in Section 3 below.

2.10 The IIA/SA screening entries for FMM27 and FMM30 compound our concern. Each state simply 'No significant effects likely' (September SA Note, Appendix A, pp. 32-33). Neither entry explains why the survey requirement is now unnecessary, how previous material uncertainty has been resolved, or how its removal affects the identification and avoidance of

[2] *Natural England, 'Guide to assessing development proposals on agricultural land', (24 July 2026), sections 5 and 6.2.*

agricultural harm. The conclusion assumes that the underlying assessment is adequate, when that is precisely the matter requiring examination. The seriousness of this issue in relation to other recent local plan examinations has been referred to in our **May 2026 Letter, para. 2.39**.

2.11 Retaining surveys at planning application stage would not, by itself, remedy an inadequate assessment of the allocations. The necessary response is to establish the likely extent and quality of agricultural land affected, seek targeted surveys where uncertainty could materially affect the allocation decision, and demonstrate how the findings inform site selection, boundaries and development capacity. Any subsequent removal of survey requirements must follow from that completed exercise. Relying upon consistency with requirements already removed elsewhere is no substitute for demonstrating that those removals were justified in the first place.

FMM33: Affordable housing

2.12 We note the revised affordable housing total. Where affordable housing benefits are relied upon to justify the proposed Green Belt allocations, those benefits must be supported by credible delivery assumptions. Our comments on EXAM187A below address whether the contributions attributed to SES29 and the additional 'policy plus' provision are adequately supported.

## 3. IIA / Sustainability Appraisal

3.1 The September 2026 IIA/SA update ('September SA Note') responds to the Inspectors' requests for further assessment of agricultural land and reasonable alternatives. EXAM217C required the Council to explain how the new evidence affects site selection, whether poorer-quality land has been preferred and, where it has not, why the proposed allocations remain justified. In accordance with the PPG, this should require comparison of reasonable

alternatives and an explanation of the reasons for selecting the preferred approach[3]; the Plan's strategy and allocations should be justified in light of the changed evidence.

3.2 The September SA Note acknowledges that cumulative BMV loss could, considered in isolation, produce moderate to major negative effects (para. 5.5). Yet it does not adequately explain the extent of that harm, its significance relative to alternatives, or why the same allocation choices remain appropriate. General references to other sustainability benefits do not answer those questions. The deficiencies identified below therefore remain material to the Plan's soundness.

Agricultural Land

3.3 Nine of the 15 assessed parcels forming the 14 proposed additional allocations now score negatively against the agricultural land indicator; none did previously (EXAM219, para. 2.6). This exposes the extent to which the earlier assessment ***understated*** the potential agricultural harm associated with those allocations. The Inspectors cannot now rely on an approach which understated the potential extent and quality of BMV loss as being 'precautionary' (September SA Note, paras. 5.3-5.4).

3.4 The chronology also raises questions. EXAM219 confirms that the predictive dataset was published in October 2025 (para. 1.3). Yet the February 2026 IIA continued to use the earlier agricultural data while stating that its site indicators reflected the most up-to-date information available (para. 9.3.16). Explaining that the dataset was unavailable during the original selection exercise in early 2025 does not explain its omission from that subsequent update. Nor does it excuse the need to properly interrogate the current position, as requested by the Inspectors.

3.5 EXAM219 retains the previously used assessment criteria 'for consistency' (para. 2.3). No site can receive a significant negative ('NN') score under this indicator (Figure 1) as there is no

[3] *PPG, 'Strategic environmental assessment and sustainability appraisal', paragraphs 001 and 018, references 11-001-20190722 and 11-018-20140306.*

measure for it. Because the updated mapping distinguishes between predicted Grades 3a and 3b, the neutral category is no longer used and the indicator has become a simple yes/no test of predicted BMV presence. Any site with predicted BMV therefore attracts the same minor negative ('N') score, whether it holds a small pocket of Grade 3a or extensive Grade 2 land. The indicator registers presence, not scale. The published criteria thus impose a ceiling on the agricultural harm that can be recorded for any individual site under this indicator, and in doing so may artificially suppress adverse findings. This is particularly troubling with reference to sites SES29 and SES30, for example, which are predicted to be predominantly BMV land (**May 2026 Letter, paras. 3.4-3.18 and Enclosure 1**[4]). SGBA's analysis of the saved allocation boundaries estimates approximately 53ha of predicted BMV at SES29 (92% of the measured site area) and 31ha at SES30 (89%).[5] CH03 is also predicted to be almost all Grade 2.

3.6 However, with reference to those allocations, EXAM219 records only a 'minor' negative score given the inability to be recorded as anything but. This is the complete opposite of a precautionary approach. In our view, before any conclusions can properly be drawn, it is necessary to assess and take into account the quantity of the area and grade likely to be lost and demonstrate how the magnitude and permanence of that loss affect the comparison with alternatives. In any event, the statement in EXAM219 that only four existing allocations are now assessed as higher-quality agricultural land (para. 2.13) is directly contracted by the 18 negative scores recorded for Regulation 19 allocations in Appendix 1, thus further significantly undermining the conclusions on impact and alternatives.

3.7 Nor does the claimed earlier 'precautionary approach' answer the point (September SA Note, para. 5.3). The February 2026 Main Modifications Addendum identified approximately 80 hectares of Grade 3 land but expressly left its BMV status unresolved (EXAM225, para. 5.7.2).

[4] *We also foreshadowed the possibility of SES30 being predominantly BMV land in our **July 2025 letter, para. 4.39**.*

[5] *SGBA mapping analysis. SES29 contains 52.75ha of predicted BMV (all Grade 3a) within 57.33ha (92%); SES30 contains 31.39ha of predicted BMV within 35.14ha (89%), including approximately 15.5ha of Grade 2 and 15.9ha of Grade 3a. Percentages use the Council's saved Main Modifications allocation boundaries (exported 28 September 2026).*

Its general acknowledgement of greenfield loss does not demonstrate that the extent and quality of BMV now predicted were assessed.

3.8 The necessary response should be a full and transparent assessment of the estimated area, grade and likely loss of BMV land, with an explanation of how those differences affect the significance attributed to adverse effects. At the very least, the already known grade and likely loss of BMV land should be properly considered as part of the sustainability appraisal and assessment of alternatives. Otherwise, in our view the Inspectors' request remains unaddressed and the site selection and consideration of alternatives cannot be concluded to be sound.

Reasonable alternatives and site selection

3.9 The September SA Note relies on agricultural land quality not having been an original 'hard constraint' or primary driver of the strategic options (paras. 5.9 and 5.17). That reasoning is inadequate and we note that there is no suggestion that such a factor is incapable of being such a constraint (which is obviously correct, especially in a situation now where loss of BMV land is a matter of heightened importance following the updated predictive ALC datasets). The updated evidence required the Council to reconsider whether the original approach still produces justified choices. This has not happened. The limited role previously assigned to agricultural land cannot itself justify maintaining that approach after the predicted harm has increased, and where those adverse effects are likely to be particularly very significant in some cases.

3.10 The February 2026 IIA already provides a method for testing whether significant effects could be reduced by removing parcels or adjusting strategic-location boundaries (paras. 7.5.2-7.5.3). The further assessment should have explained whether the newly recognised agricultural harm warrants such testing; a reduced allocation or different combination of sites may avoid harm while retaining a worthwhile contribution to development needs. That

exercise should have included whether CH03, SES29 and SES30 remain justified in their proposed form, taking account of alternatives involving less agricultural harm.

3.11 The strategic comparison is noteworthy in that regard. Options 4, 5 and 6 each provide 38,012 homes, yet the dispersed approach performs better for agricultural land than the strategic approach, while the mixed approach allows more sensitive sites to be avoided (September SA Note, paras. 5.21-5.27). All receive the same 'minor negative effect' rating for land and soils. The Plan as modified follows Option 6. But there is no explanation of how the opportunities to avoid harm have informed the actual allocations within the Council's preferred approach. This explanation is necessary for soundness to be established.

3.12 At site level, EXAM219 identifies 28 alternatives without a fundamental constraint which now score positively for agricultural land quality (para. 2.11). Their suitability and deliverability require consideration alongside their obvious advantages from a BMV perspective. The Council has repeated its rejection reasons but has not given any explanation as to how the changed BMV consideration has affected the balance of considerations or as to why the outcome is asserted to be the same. The Inspectors cannot simply rely on bare assertions to justify rejection of alternatives that are not shown to be preferable in BMV terms.

3.13 EXAM219 records improved agricultural assessments for GBOM03, S03039 and S03050 (para. 2.10), although the Council's Green Belt Review rates each as critical to preventing sprawl or settlement merging. There is no explanation as to why avoiding that harm outweighs the greater agricultural loss now predicted at its preferred allocations, taking account of the other considerations affecting each site. Totley (S02895), which retains a positive agricultural assessment and includes previously developed land, likewise warrants comparison alongside its recognised constraints. Again, it is not open to the Inspectors to rely on bare assertions in dismissing alternatives in this way.

3.14 Our **December 2025 Letter (para. 4.4)** questioned the exclusion of Council-owned Ryecroft Farm (S03012). SGBA has now obtained the registered lease dated 5 November 2014 [**Appended to this Letter alongside EIR disclosure**]. Although granted for 40 years, clause 43

expressly provides for the Council, as landlord, to terminate the lease over all or part of the land for development, subject to planning permission and the requisite notice. This is materially comparable to the provisions relied upon by the Council in EXAM215 to demonstrate that the agricultural tenancy at NES37 does not prevent its allocation and development (which we understand is a lease for three generations / of comparable length). It is therefore unclear why Ryecroft Farm continues to be excluded as fundamentally unavailable (EXAM130B and EXAM219, para. 2.12), particularly given its retained positive agricultural land assessment in EXAM219, in contrast to the predicted BMV land at NES37 and SES30. The Council has not adequately explained this inconsistent treatment or demonstrated why Ryecroft Farm should not be considered a reasonable alternative, given it would involve less harm to landscape and agricultural land and is of weaker Green Belt purpose.

3.15 Crimicar Lane also requires clarification. EXAM130 excludes the 3.76ha site, S01265, because of its active outdoor sports use. However, REF1.2074 promotes a smaller 1.13ha parcel for approximately 32 homes, retaining the cricket square. There is no evidence to identify where that smaller proposal has been assessed, nor reasons given to explain whether the sports constraint still warrants its exclusion. An assessment of the larger parcel does not, without that evidence and explanation, resolve the merits of the alternative actually promoted.

3.16 The six additional urban site appraisals also require a clear explanation of their implications for the strategy. Their anticipated treatment as windfalls was the original reason for omitting them from assessment (September SA Note, para. 3.2). The further work does not appear to establish what contribution suitable and available sites could realistically make, nor when, and whether that contribution is already counted. This is necessary to understand whether they could reduce reliance on particular Green Belt allocations without double counting supply. We return to the individual sites under EXAM130C below.

<u>Strategic Locations and overall assessment of effects</u>

3.17 In relation to Handsworth the February 2026 IIA treated the northern parcel as not being BMV land (EXAM224, Appendix G, p.241). The September SA Note now predicts predominantly

Grade 3a land, with some Grade 2, (i.e all BMV land) and increases the housing location's adverse rating from minor to moderate (Table 5.1). That materially weakens the earlier agricultural assessment underpinning the selection of SES29 and SES30.

3.18 The employment assessment remains minor negative, relying on the 'relatively small scale of loss' and an earlier precautionary approach (para. 5.12; Table 5.2). Yet the earlier assessment expressly left BMV status unclear (EXAM224, Appendix H, p.328) and was not precautionary (see para 3.3 above). Also Table 5.2 downgrades the predicted 'predominantly Grade 3a land, with some Grade 2' to just 'Grade 3a predicted', and para 5.13 downgrades the change (which is from non-BMV to BMV) as 'marginally different in terms of the quality of soils affected'. These errors cannot form a rational basis for declining to amend the assessment of 'land and soil' impact in circumstances where there is a significant change in both the quality of soils affected and the policy effect of the change (in terms of from non-BMV to BMV). To the extent the Council pre-judges or reverse engineers whether or not this might 'represent a major differentiator in the site selection process' (see last sentence of para 5.13), this is an obviously erroneous approach.

3.19 The revised assessment also increases the adverse effect at Location 9, Grenoside/Ecclesfield, from minor to moderate negative (September SA Note, Table 5.1), but, as with Handsworth, this is not carried through to the commentary in Table 5.2 and paras 5.12 -5.13, giving rise to similar errors as those referenced above.

3.20 At Plan level, the September SA Note acknowledges that cumulative BMV loss could produce moderate to major negative effects but reduces the overall land and soils assessment to minor negative by reference to urban regeneration, efficient land use and recycled aggregates (paras. 5.5-5.6). Those benefits form part of the planning judgement but obviously do not restore agricultural land permanently lost to development. Combining them within the same appraisal objective masks the extent of agricultural harm and does not satisfy the Inspectors' request for the Council to justify why areas of poorer quality land have not been selected (EXAM217C, para. 21). There is nothing to indicate, on a site by site basis, or at all, what benefits would be lost under less harmful alternatives, and why those differences justify the

additional agricultural loss. These omissions are fatal to a rational consideration of reasonable alternatives.

## 4. Additional Associated Documents

EXAM130C: Promoted urban sites and wider urban capacity

4.1 EXAM130C provides the six urban site appraisals sought in our **May 2026 Letter**. But completing those appraisals does not establish that reasonable urban alternatives have been fully explored. The Inspectors expressly linked this work to the need to justify Green Belt release (EXAM217C, paras. 5-6). The Council has not explained what the findings mean for the extent of release proposed.

4.2 As we explained in our **May 2026 Letter**, **paras. 2.9-2.12**, treating further sites as windfalls does not answer that question. The Council should establish what suitable sites could deliver during the Plan period, how that contribution relates to its existing allowance, and whether allocating or actively bringing them forward could reduce reliance on Green Belt land. Double counting must be avoided, but the Council cannot simply assume that every further opportunity is already allowed for as yet further "windfall".

4.3 Bassett Place and Collegiate Campus illustrate the outstanding work. Bassett Place is Council-owned, included in a draft disposal programme for a housing association, and considered potentially suitable subject to contamination, ecology and open space concerns (EXAM130C, p.11). At Collegiate Campus, the University wishes to vacate significant parts of the site, with potential for conversion and phased redevelopment, subject to heritage constraints (p.20). The requirement to consider alternatives to Green Belt release requires that realistic capacity and timing be established and considered, applying comparable scrutiny to urban opportunities and the proposed Green Belt allocations.

4.4 SGBA's review also identifies a need to check the wider urban supply. At Weston House/Western Tower, West Bar (S00178), the December 2023 Brownfield Land Register

records a minimum of 180 homes, while a subsequent application proposes 316 homes (25/03233/FUL). It is unclear what contribution is already counted and whether that proposal changes its assessment of available capacity.

4.5 The wider question is also illustrated by Evidence Base document CC02, the '*July 2020 Central Area Strategy Capacity Report*'. It identified 26 Future Potential Sites and 36 Gap Sites but left their capacity unassessed and recommended further work (p.62). Some subsequently became allocations e.g. B&Q at Queen's Road (LR01) and Grosvenor Casino at Duchess Road (LR04). There is no evidence to demonstrate how the full list was subsequently assessed, which opportunities were pursued or discounted and why, and how any contribution is reflected in its current supply assumptions.

4.6 Availability also requires closer examination. Site references KN11, SU26, SV17 and SV18, with a combined indicative capacity of 273 homes, are proposed for removal as allocations and retention as Opportunity Sites because of insufficient availability information (MM235, MM267, MM291 and MM292). Examination Document EXAM81O records unanswered landowner enquiries[6]. But there is no explanation from the Council to demonstrate what further engagement, and where appropriate land assembly or relocation work, followed those enquiries to establish whether these sites could come forward during the Plan period.

4.7 Our request for a refreshed call for sites, or an equivalent urban capacity review, therefore concerns both longstanding opportunities and newly promoted sites. The Council has not identified the work undertaken following the Inspectors' request to explore additional urban capacity (EXAM120, paras. 34-35). Nor has the Council provided evidence to support its subsequent claim that urban supply had been maximised (EXAM124, para. 2.14). The September appraisal's retained conclusions require a clear explanation of whether further reasonable urban opportunities could reduce the proposed Green Belt release and its agricultural harm, taking account of supply already counted, including windfalls.

[6] *EXAM81O, Site Availability Tables – Central Area Updated and Merged, pp. 9 (KN11), 24 (SU26) and 28 (SV17 and SV18).*

EXAM187A: Affordable housing supply update

4.8 EXAM187A counts 261 affordable homes from SES29 within the Plan period. This represents 30% of its full capacity of 870 homes, although MM410 anticipates only 735 homes being delivered within that period. There is nothing to explain how the phasing would viably deliver those 261 affordable homes. Without this, that level of affordable housing in the Plan period cannot be relied on to justify the allocation.

4.9 The additional 225 'policy plus' homes also depend on external funding and delivery arrangements. EXAM187 describes the intended approach, but EXAM187A provides no updated evidence supporting those arrangements. Where these additional homes are relied upon to justify the proposed Green Belt allocations, a realistic prospect of their delivery needs to be demonstrated and this has not happened [see **December 2025 Letter, para. 4.7**].

EXAM221: Alternative access option for SES29

4.10 EXAM221 identifies a possible access arrangement, but its acceptance in principle remains subject to further assessment. The Council's response in EXAM217A expressly anticipates a Transport Assessment and further technical work; the promoter's letter also identifies outstanding design, modelling and Road Safety Audit requirements. The published material does not demonstrate how the proposed arrangement would accommodate 870 homes and 20ha of employment alongside wider growth.

4.11 The two development access arms connect to the same roundabout. They therefore provide no independent route if that junction becomes obstructed. There is nothing to demonstrate how emergency access and safe movement for pedestrians and cyclists would be maintained. We have previously stressed that NPPF paragraph 110(b) requires safe and suitable access to be achievable for all users at allocation stage (**July 2025 Letter, paras. 4.21-4.23**).

4.12 The access arrangement must also be reconciled with the site's capacity. An updated land budget is needed to show how housing, 20ha of employment, access, drainage, open space

and necessary buffers can be accommodated together within the amended boundary. Until that work is provided, EXAM221 does not resolve our previous capacity concerns. If those requirements cannot be accommodated together, the allocation's capacity and delivery assumptions cannot rationally be relied on. We have already made the point that the landowner's previous promotion material significantly deviated from the Council's assumptions on net developable area and quantum of development (**May 2026 Letter, para. 2.46**).

4.13 The assessment of EXAM221's proposed access arrangement should also have tested the traffic implications of both delivery and non-delivery of Waverley station. Network Rail's response of 15th October 2026 (FOI2026/01605, **Appended to this Letter**) confirms that it had not undertaken outline design and held no agreed construction timetable for Waverley station. The disclosed Waverley Rail Station Option Study Report (P02, pp. 56-57) places vehicular access and parking on the Waverley/Rotherham side of the railway and records no proposal to improve the public footpath on the Sheffield side. Safe, convenient walking and cycling links from SES29 should therefore have been demonstrated. A station could reduce some car journeys while attracting traffic to its access and car park; non-delivery could leave greater car reliance where rail use has been assumed. The cumulative effects on Orgreave Lane and the proposed roundabout need to be demonstrated before relying on rail benefits to justify the allocation.

<u>EXAM222: SES30 and the Quaker burial and preaching grounds</u>

4.14 EXAM222 confirms that the recorded burial ground lies outside SES30 and that the recommendation for local listing has been agreed for formal adoption. Its position outside the allocation does not resolve the question of harm through development within its setting, however, and existing housing adjacent does not establish that the remaining undeveloped setting makes no contribution to its significance. That contribution, the effects of SES30 and any necessary mitigation needed to be assessed before concluding that the allocation's capacity and development requirements are unaffected.

4.15 EXAM222 cannot confirm the preaching ground's location or extent, although it identifies the most likely location as east of SES30. That uncertainty does not establish an absence of heritage interest. The Council has not explained whether the documentary evidence indicates archaeological potential affecting SES30 or its access, and whether further investigation is needed. This remains a risk to the developable site area, alongside all the other constraints previously identified and which remain unresolved (see for example, **December 2025 Letter, para. 3.15**).

Yorkshire Water infrastructure evidence

4.16 Yorkshire Water's EIR disclosure of 13th October 2026 (EIR 1483, **Appended to this Letter**) raises wider questions about the September SA Note's conclusion that the proposed allocations remain appropriate on the full suite of evidence (Appendix B, paras. 3.2-3.3). The supplied assessment records ten red 'object to allocation' entries corresponding to earlier parcels underlying nine allocations: CH04, CH05, NES36, NES37, NES38, NES39, NWS30, SES30 and SWS19 (allocation references: SA Note, Appendix B, Appendix 3). This is directly relevant to FMM26 and FMM28, which amend NWS30 and NES38 respectively, and FMM33, which revises the affordable housing target to reflect capacity changes at NES37, NES39, SES30 and SWS19. The assessment does not identify which red-rating criterion applies to each entry or establish whether the concerns remain current. The Council has not reconciled these findings with current boundaries and capacities, nor provided evidence of any resolution. Any necessary works, mitigation, funding and timing should be reflected in the affected allocations' capacity and delivery assumptions, and the Council should have explained whether this alters the retained SA conclusions.

## 5. Conclusion

5.1 The work prepared by the Council in support of this latest consultation identifies greater potential agricultural harm but does not adequately demonstrate why the proposed

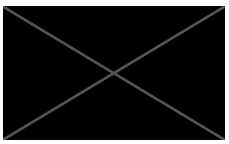
allocations remain justified, contrary to the Inspectors' request. The extent and significance of BMV loss, the comparison with less harmful alternatives, and the capacity and deliverability of constrained sites remain insufficiently resolved. These matters go directly to the justification for the proposed Green Belt release.

5.2 FMM27 and FMM30 demonstrate how site allocations NWS31 and SES10 cannot be found sound on the current information. FMM27 and FMM30, together with MM184 would allow the allocated sites to be developed without any further consideration of the extent of agricultural harm caused. This is in circumstances where the full extent of the agricultural land quality has not been taken into account and where there has not been proper consideration of comparative agricultural land quality, alongside other factors, in the consideration of alternatives. Before those allocations could be found sound, the deficiencies identified above would need to be remedied, and it would be necessary to reconsider the affected allocations and make consequential changes to boundaries, capacities, infrastructure requirements and the delivery trajectory. This should include a quantified assessment of agricultural loss and a clear comparison with reasonable alternatives. Any material revisions to the appraisal or proposed modifications should be subject to further consultation, albeit noting the current length of the examination and that the evidence base is becoming increasingly dated. Each successive consultation relates to the Council making further attempts to retrospectively justify its actions; which in turn creates further material inconsistency.

5.3 **SGBA maintains its objections to the Plan's legal compliance and soundness for the reasons set out in this letter and our May 2026, July 2025 and December 2025 Letters. The legal compliance concerns raised here include the adequacy of the SA assessment of reasonable alternatives and the reasons for selecting the preferred approach; the soundness objections concern whether the allocations are justified and effective. This includes the need for a fundamental review of the approach to growth in South-East and North-East Sheffield, and reappraisal of sites SES29 and SES30. We respectfully ask the Inspectors not to recommend adoption unless and until these matters have been properly addressed; or, in the**

**alternative, request that the Plan be withdrawn from examination because it is now incapable of being made sound.**

Yours sincerely,



**Steven Stroud MRTPI**
James Bailey Planning