Representation on the Sheffield Plan Further Main Modifications

Marie Tidball MP

To: Strategic Planning Team, Sheffield City Council, Howden House, 1 Union Street, Sheffield S1 2SH (sheffieldplan@sheffield.gov.uk), for the attention of the Sheffield Plan Inspectors

From: Marie Tidball MP, Member of Parliament for Penistone and Stocksbridge, House of Commons, London SW1A 0AA

Re: Sheffield Plan – Proposed Further Main Modifications consultation (14 September – 28 October 2026)

Introduction

Dear Inspectors,

I am writing as the Member of Parliament for Penistone and Stocksbridge to respond to the consultation on the proposed Further Main Modifications to the Sheffield Plan and the evidence published alongside them.

Nine of the Green Belt sites proposed for allocation in this Plan are in my constituency: NES36, NES37, NES38 and NES39 in Grenoside and Ecclesfield; NWS30 and NWS31 in Oughtibridge and Wharncliffe Side; and CH03, CH04 and CH05 in Chapeltown. Since 2025 I have corresponded with more than 1,500 constituents about the Plan, hosted a public meeting in Grenoside attended by around 150 residents, and held advice surgeries and community meetings across every affected community.

From the outset, my position has been consistent. I support Sheffield having a Local Plan, and I share the Government's ambition to build the homes our country needs. I want my constituents' children and grandchildren to be able to stay near but go far. I am pro-homes and pro-public transport.

My concern is that too many of the homes in this Plan are in the wrong places. In my written submissions, my oral statement to you on 2 October 2025 and my response to the Main Modifications on 5 May 2026, I set out a practical alternative:

1. a fairer distribution of Green Belt release across the authority, so that the S35 area does not carry a disproportionate share;
2. greater use of brownfield and grey belt land, and of long-term empty homes;
3. bringing forward the Sheffield Hallam University Collegiate Campus for housing;
4. higher-density, transport-led development along the Don Valley tram-train corridor, including at Oughtibridge and Wharncliffe Side; and

5. as a result, relieving the pressure on Grenoside, Chapeltown and Ecclesfield, where roads, GP services and green space are already under strain.

I write now because of the evidence published for this consultation, in particular the Integrated Impact Assessment: Sustainability Appraisal note (September 2026), the Site Selection Addendum (EXAM 219) and the Further Main Modifications affecting sites in my constituency, materially strengthens that case. Each point below identifies the modification or document concerned and whether I consider it sound.

In summary, I ask you to:

1. delete Town End Farm (NES37) from the Plan, in light of the new agricultural land evidence;
2. delete the remaining Grenoside sites, NES38 and NES39;
3. meet those homes instead through higher-density, transport-led development at Oughtibridge and Wharncliffe Side, and through urban and brownfield alternatives;
4. make three changes to FMM27, FMM31 and FMM33; and
5. ensure the questions my constituents have raised, including on Warren Lane and empty homes, are answered.

I also ask you to consider pausing the examination so that this work can be done properly. I have written separately to the Leader of the Council to ask the Council to pause the Plan.

1. Town End Farm (NES37): the new evidence means it should be removed from the Plan

Relevant documents: IIA note Section 5 and Table 5.1; Site Selection Addendum (EXAM 219); FMM33.

Position: in light of the new agricultural land evidence, the allocation of NES37 is not justified or consistent with national policy. I ask that it is deleted from the Plan.

Town End Farm lies between The Wheel and Yew Lane, within allocation NES37 (land to the south of The Wheel and between Creswick Avenue and Yew Lane). It is a working farm, farmed by my constituent Adele Riddle. NES37 is proposed for 592 homes on Council-owned land.

I welcome your request of 27 July 2026 that the Council revisit its site assessment using DEFRA's predictive Agricultural Land Classification data. The Council's Sustainability Appraisal note now moves NES37 from neutral to higher quality agricultural land, which means it is likely to be best and most versatile land. It was previously recorded only as Grade 3, sub-grade unknown.

The note also finds that the Grenoside/Ecclesfield strategic location now performs worse on land and soils, moving from a minor to a moderate negative effect, and that almost the whole area is higher quality land (Table 5.1). It accepts that the strategic locations performing worst on agricultural land arguably should not be prioritised in the order of Green Belt release (paragraph 5.18), in line with national guidance. I note that GB7: Development which is not inappropriate in the Green Belt within the National Planning Policy Framwork (NPPF) published in August 2026, states that while agricultural and horticultural uses are permitted as exceptions to inappropriateness, they must still respect the broader Green Belt objective of keeping land permanently open and avoiding excessive or unjustified urban-style structures.

You asked the Council to show whether poorer land had been selected and, if not, why (paragraph 21 of your letter of 27 July). The Site Selection Addendum identifies 28 unconstrained Green Belt sites now assessed as poorer quality land, yet concludes that the earlier reasons for not shortlisting them still hold (paragraphs 2.9 to 2.11). It does not re-weigh NES37 against them. The evidence that underpinned the allocation has changed, and the justification has not been remade.

This concern is reinforced by what residents have since been told. In September 2026 the Council's planning team said that the agricultural land update was still under way, but that it did not expect it to lead to different conclusions about which sites should be allocated. With respect, I disagree. Evidence should inform the choice of sites, not follow it, and the Addendum's conclusion that nothing has changed should be read in that light.

I raised Town End Farm in the House of Commons on 22 October 2026, asking whether the quality of agricultural land should always be taken into account when considering local plan site allocations. The Parliamentary Under-Secretary of State for Environment, Food and Rural Affairs, Jenny Riddell-Carpenter MP, replied that the land use framework will help deliver "faster, clearer and more co-ordinated decisions on housing and infrastructure, ensuring that our most productive farmland is

safeguarded" (Hansard, 22 October 2026). Allocating 592 homes on a working farm now assessed as likely best and most versatile land does not meet that test.

The public benefit offered in return is also less certain than it was. NES37 is one of the sites whose reduced capacity lowers the Plan's affordable housing target (FMM33). Its additional "policy plus" affordable homes, now 59, depend on Homes England funding that has not been secured, with an estimated lead-in of seven years. The cost in farmland is greater than previously understood, while the benefit is smaller and later.

I ask that NES37 is deleted from the Plan by main modification, and that its 592 homes are met instead through the alternatives set out in sections 3 and 4.

2. Delete the remaining Grenoside sites, NES38 and NES39

Relevant documents: IIA note Section 5 and Table 5.1; FMM7, FMM28 and Map Change 3.

Position: NES38 and NES39 should also be removed. The new farmland evidence applies to both sites. I also reiterate my concerns about public transport and the Golden Rules, while recognising that these go wider than the modifications now consulted on.

The updated evidence shows that every Grenoside allocation is likely to be best and most versatile agricultural land:

Site	Location	Homes	Previous assessment	Updated assessment
NES37	The Wheel / Creswick Avenue / Yew Lane (Town End Farm)	592	Grade 3, sub-grade unknown	Likely best and most versatile
NES38	Fox Hill Road and Holme Lane Farm	188	Poorer quality	Likely best and most versatile (both parcels)
NES39	Wheel Lane / Middleton Lane	148	Grade 3, sub-grade unknown	Likely best and most versatile

The reasoning in section 1 applies equally to NES38 and NES39. NES38 is the clearest case: it was previously assessed as poorer quality land, and the Council's justification rested in part on that.

The Further Main Modifications add to my concern. NES38 must be enlarged from 6.70 to 6.80 hectares simply to allow road access within the site (FMM7, FMM28 and Map Change 3). Access has been among the most consistent concerns raised with me, including the blind corners where access to NES39 would join Wheel Lane. This change confirms that access to the Grenoside sites remains unresolved at this late stage.

NES39 is also tied to NES37. Its site policy requires it to share a single infrastructure delivery plan with NES37, on the opposite side of The Wheel. If NES37 is removed, as I ask in section 1, the infrastructure basis for NES39 falls away with it.

Beyond the farmland evidence, I reiterate two points I have made throughout the examination.

- **Public transport.** Grenoside has no rail station, and residents tell me buses are infrequent at the times they need them. The Wheel is a single-lane road past a listed building, Creswick Lane is

dangerous at school pick-up times, and there is no bus or pedestrian route to Oughtibridge other than through the woods. Development here would be car-dependent by design.

- **The Golden Rules.** Land released from the Green Belt should deliver a higher level of affordable housing, the necessary infrastructure and new or improved green space. The Grenoside sites are planned at 30% affordable housing, and I have seen nothing to show how GP, school and leisure capacity will keep pace. That matters in a constituency where 25.6% of residents are aged 65 or over, against 18.9% across England and Wales (House of Commons Library).

I ask that NES38 and NES39 are deleted from the Plan, and that their 336 homes are met through the alternatives in sections 3 and 4. Together with NES37, that is 928 homes to replace.

3. More homes linked to transport corridors

Relevant documents: FMM6, FMM26 and Map Change 2 (NWS30); FMM27 (NWS31); IIA note Section 5.

Position: Sites that would benefit hould be developed at higher density, delivering around 416 homes in total, as part of the replacement for the Grenoside sites.

I am not asking for the homes in my constituency to disappear. I am asking for them to be built where public transport can serve them throughout the city. For examples, throughout this examination I have proposed that the sites at Oughtibridge and Wharncliffe Side should accommodate around 416 homes in total: around 166 at NWS30 (Forge Lane) and 250 at NWS31 (Storth Lane / School Lane). That is an uplift of around 244 homes on the current proposals of 69 and 103 homes.

This is not an arbitrary figure. These sites lie on the Upper Don Valley corridor, where the proposed extension of the tram-train to Stocksbridge via Oughtibridge, Wharncliffe Side and Deepcar offers the prospect of genuine public transport connectivity. Concentrating growth where sustainable transport can serve it is exactly what national policy asks of plan-makers, and it is the kind of development I believe can command support across communities.

The Further Main Modifications and the Council's own evidence support this approach in two ways.

- **Density is already recognised as flexible:** FMM6 and FMM26 reduce NWS30 from 2.56 to 2.52 hectares without changing its capacity. In agreeing this, you noted that site capacity estimates are approximate and can be achieved through adjustments in density and design (letter of 27 July 2026, paragraph 7). The Council's report on the additional sites confirms that capacities are estimates, not a cap, and that assumed densities are based on the bottom end of the density range for each location. The same flexibility should be used to raise the capacity of both sites.
- **Better use of land already being released:** The updated evidence shows that NWS30 and NWS31 are also likely to be best and most versatile land. If they are to be released in any event, making the most efficient use of them means fewer hectares of productive farmland are lost elsewhere for the same number of homes. The IIA note itself recognises land use efficiency as part of the land and soils objective (paragraph 5.6). Building more homes here, rather than releasing three farmland sites in Grenoside, is the option most consistent with footnote 58.

Higher density must come with the right conditions. I ask that the uplift is accompanied by a commitment to the tram-train extension, improved bus services to Middlewood and Sheffield, a higher proportion of affordable homes, and design that respects the character of both villages.

4. Weighing the alternatives: brownfield, density and the Government's lines

Relevant documents: Site Selection Addendum (EXAM 219); IIA note Sections 3 and 5; Promoted Urban Sites Topic Paper Addendum (EXAM 130C); FMM13.

Position: the new evidence confirms that my constituency carries a disproportionate share of the Plan's impact, and that reasonable urban and brownfield alternatives have not been properly weighed.

Of the nine Green Belt allocation parcels across Sheffield now assessed as likely best and most versatile land, seven are in Penistone and Stocksbridge: CH03, NES37, both NES38 parcels, NES39, NWS30 and NWS31. Only SES29 and SES30 lie elsewhere. Across the Plan as a whole, the effect on land and soils has worsened from neutral to minor negative (IIA note, paragraph 5.4). The burden of that loss falls overwhelmingly on the S35 area. That is the unfairness I have raised since 2025, and it is now set out in the Council's own evidence.

The Government's lines on farmland. During the Makerfield by-election, the Prime Minister, Andy Burnham, said: "Do less of the development on greenfield and start to repurpose retail space, we've seen that in Farnworth" (BBC Question Time, 4 June 2026). His predecessor told the House: "We will not plough through farmland; we will make sensible proposals to build houses" (Hansard, 7 January 2026, col. 265). I would put it as a simple test: before productive farmland is released, has every urban option, including retail space and high streets, been properly tested? The Plan says very little about repurposing retail sites or high streets for housing.

Urban sites. I welcome your request that the six urban sites promoted during the May 2025 consultation be appraised (IIA note, Section 3). These include the Sheffield Hallam University Collegiate Campus, which I and other Sheffield MPs pressed to be brought forward for housing in July 2025, and which the University has confirmed it considers capable of substantial residential development. These sites are assessed as non-agricultural land. The Council's position is that such sites are accounted for within the windfall allowance. But where a site has been formally promoted, appraised and found suitable in principle, it is a reasonable alternative, as you noted with reference to paragraph 141 of the NPPF (letter of 27 July 2026, paragraphs 5 and 6).

Brownfield. The Council's Brownfield Register was last updated in December 2023. An up-to-date register would help identify further brownfield capacity, both now and at the first review. The Council's recent decision to bring forward two brownfield sites for 169 homes through its housing company [source to confirm] shows what can be done when brownfield land is prioritised.

Density. Analysis by the Save S13 group (October 2026) compares the Plan's density assumptions with those in Leeds:

Area	Sheffield Plan (homes per hectare)	Leeds (homes per hectare)
City centre	300	350
Main urban areas	35 to 50	85
Rural areas	30	35

The group estimates that matching Leeds' city centre density alone would yield around 2,870 more homes. The former Green Belt sites are planned at 30 to 40 homes per hectare, almost the same as the brownfield assumptions, which raises the question of why so much Green Belt land is needed. The net developable area assumptions behind Sheffield's urban capacity rest on an undated Bolsover District Council methodology, adopted through a 2008 joint assessment with Rotherham. By contrast, Gloucester's 2025 Urban Capacity Study, using the National Model Design Code, assumes 60 to 120 homes per hectare for urban neighbourhoods. I note that you have found the Plan's densities appropriate. My point is that the evidence on the city's urban capacity is dated, and has not been tested against these alternatives. I have asked the Council's Chief Executive to commission an independent review of urban capacity before Green Belt farmland is released.

Replacing the Grenoside homes. I recognise the Council's concern that the Plan has only a small margin of supply above its housing requirement, and that under-delivery could engage the Housing Delivery Test. That is why I am not simply asking for sites to be removed. The 928 homes at Grenoside can be replaced from sources already before you:

Source	Homes	Basis
Higher density at NWS30 and NWS31	about 244	Section 3; capacities are estimates at the bottom of the density range
SHU Collegiate Campus	[X]	Promoted by the University and appraised in the IIA note, Section 3
City centre at Leeds densities	about 2,870	Save S13 estimate, October 2026

I ask the Inspectors to weigh these as genuine alternatives to the Grenoside allocations. I also welcome the commitment in FMM13 to an early review linked to the new plan-making system. When the Council

prepares its next plan, I ask that it revisits the distribution of growth across the whole authority, so that no single part of the city bears a disproportionate share.

5. Three modifications: FMM27, FMM31 and FMM33

FMM27 (NWS31): keep the farmland condition. FMM27 would delete the requirement for an agricultural land survey on NWS31 for consistency with other allocations. Yet the updated evidence now shows NWS31 is likely to be best and most versatile land, having previously been assessed as poorer quality, and you noted the Council may need to reflect on the new results before removing such conditions (paragraph 22). FMM27 is not justified. I ask that the condition is retained, or replaced with a soil resource management requirement securing the retention and reuse of productive topsoil, as the IIA recommends, applied to every allocation now assessed as likely best and most versatile land.

FMM31 (CH04 Hesley Wood): protect the Green Belt. FMM31 is not effective as drafted and omits a Green Belt safeguard the Council itself proposed. It confirms that highway access off Cowley Hill will pass through the Hesley Wood Local Wildlife Site and Urban Green Space Zones, and that ground remediation and remodelling will take place within the Local Wildlife Site, Urban Green Space Zones and Green Belt. Chapeltown is already under pressure, and residents have consistently raised traffic on Cowley Hill and around the M1 with me. I ask for four changes:

1. **Protection of the Green Belt.** In its July 2026 response to you, the Council proposed wording requiring proposals to "ensure the openness of the Green Belt is preserved". That requirement is missing from the published FMM31, even though the condition now expressly allows engineering works in the Green Belt beyond the allocation. I ask that it is reinstated.
2. **Clarity of wording.** The condition refers both to development "within" and "outside" the Industrial Zone, and it is unclear which works are permitted where. I ask for a clean, consolidated version.
3. **Local compensation.** Replacement habitat for harm to Hesley Wood Local Wildlife Site should be provided in the Chapeltown area, and secured before works affecting the wildlife site begin.
4. **Construction traffic.** With the access route now fixed in policy, I ask that a construction traffic management plan for Cowley Hill is required.

FMM33: affordable homes. FMM33 reduces the Plan's affordable housing target from 5,531 to 5,479 homes, while the Council's response to EXAM 217 gave a revised total of 5,438 (320 a year). I ask that these figures are reconciled so that the monitoring target is correct.

The larger point is the scale of the gap. The Council's housing market assessment identifies a need for 902 affordable homes a year, so the Plan meets only around a third of it, wherever the homes are built. Sheffield's housing problem is above all one of affordability, tenure and getting the right homes to those who need them. Of 27,892 applications on the housing register, only 1,142 (4.1%) are in the priority bands A to C, and the Council has confirmed that the register was not used to calculate housing need. The test for the Green Belt allocations should therefore be how many of their homes will be affordable homes of the size and tenure local households need.

The reduction arises partly from the lower capacity at NES37. I have always said that new housing in my constituency must deliver more social and affordable homes for local people, not simply more houses on the edge of our villages. I ask that the higher-density allocations I propose at Oughtibridge and Wharncliffe Side carry a higher proportion of affordable homes, consistent with the Golden Rules, so

that the change I am seeking delivers at least as many affordable homes as the Grenoside sites would have done.

Other modifications. I support the strengthened Policies BG1 and GS5 (FMM4, FMM5, FMM15 and FMM16), including the recognition of Greno Woods as one of the city's major green spaces; removing the Grenoside allocations would best protect the countryside around it. I support the changes aligning the Plan with the Government's new planning legislation and ask the Council to commit to a timetable and public consultation on replacement guidance, starting with developer contributions (FMM3, FMM23), on which infrastructure for new homes in the S35 area depends. The HRA Review relies on a full recreational pressure mitigation strategy (paragraph 4.4.2); as the South Pennine Moors borders the Stocksbridge and Upper Don area, I ask that its timetable is published.

6. Residents' questions that still need answers

Warren Lane (CH03). Residents living alongside the employment allocation at Warren Lane, Chapeltown, have never had proper answers to their concerns, and I am still not satisfied. They fear that disturbing land with a mining history, within 250 metres of a historic landfill, could release contamination. They are concerned that large warehouse-style buildings would overshadow the linear village along Warren Lane, and that lighting and noise would run through the night. The site policy defers the contamination and landfill assessments to the planning application stage. The new evidence also shows CH03 is likely to be best and most versatile land. I ask that the contamination and landfill assessments are required before any development is permitted, that the policy sets limits on building heights and external lighting, and that the Council answers these questions in its report to you. I am also seeking clarity from the Ministry of Housing, Communities and Local Government on how the Golden Rules apply to employment land released from the Green Belt.

Empty homes. There are 6,943 empty properties in Sheffield, including long-term empty homes. In September 2026 the Government announced stronger powers for councils to take over empty homes, cutting the period a home must be empty before an Empty Dwelling Management Order can be sought from two years to six months (Local Government Lawyer). Empty homes brought back into use do not count towards additional net dwellings, so they cannot replace allocations. But they can help meet the need for affordable homes now. I ask the Council to set out how it will use these powers in Sheffield.

Housing numbers. Residents have repeatedly been told that, if the Plan is not agreed, 51,000 homes would be required, most of them on the Green Belt. That figure appears to rest on the old standard method with the 35% cities uplift, which the Government abolished in December 2024. Under the current method, Sheffield's need is around 2,451 homes a year. I ask the Council to publish the working behind the figures councillors are being asked to weigh.

7. Process and accessibility

In October 2025 I wrote to you about documents published late in the hearings, leaving my constituents little time to respond. Similar issues have arisen again:

- two different closing dates have been published: 5pm on Monday 26 October and 5pm on Wednesday 28 October;
- the IIA note was corrected on 14 and 15 September, and the Policies Map schedule on 24 September, after the consultation opened; and
- documents central to this consultation, including EXAM 216 to 222, are available only on the examination website, not the Council's consultation portal.

Residents have also been asked to put their technical questions about the Plan into this consultation rather than raise them at Council meetings. As the Inspectors do not answer questions from members of the public, many residents have had no clear route to the information they need. Colleagues in Parliament have raised the same concern. I ask that the substantive questions raised in representations are identified and answered in the Council's report to you, and that all representations received up to 5pm on 28 October are accepted in full.

8. Summary of requests

The evidence published for this consultation has changed the basis on which the Green Belt sites in my constituency were chosen. I therefore ask the Council to request, and the Inspectors to agree, a pause in the examination, so that the site selection can be properly re-weighed against the new farmland evidence, the urban capacity evidence can be brought up to date, and residents' questions can be answered. A pause is not a call for fewer homes. It is a chance to put them in the right places. I have made the same request to the Leader of the Council, and Clive Betts MP has made the same call.

In summary, I ask:

1. **Town End Farm:** that NES37 is deleted from the Plan, as the new evidence shows it is likely best and most versatile land and the Grenoside/Ecclesfield location now performs among the worst on land and soils.
2. **Grenoside:** that NES38 and NES39 are also deleted, with the 928 Grenoside homes replaced through the sources in sections 3 and 4.
3. **Oughtibridge and Wharncliffe Side:** that NWS30 and NWS31 are developed at higher density, delivering around 416 homes in total (an uplift of around 244), linked to the tram-train extension to Stocksbridge and improved bus services.
4. **Alternatives:** that the appraised urban sites, including the SHU Collegiate Campus, are weighed as reasonable alternatives; that footnote 58 is applied through a genuine re-weighing of sites; and that the Brownfield Register and urban capacity evidence are updated.
5. **FMM27:** that the agricultural land condition on NWS31 is retained, or replaced by a soil resource management requirement for all allocations now assessed as likely best and most versatile land.
6. **FMM31:** that the requirement to preserve the openness of the Green Belt is reinstated on CH04, the condition is redrafted clearly, compensatory habitat is provided locally, and a construction traffic plan for Cowley Hill is required.
7. **FMM33:** that the affordable housing target is reconciled, and that the alternative I propose delivers at least as many affordable homes as the Grenoside sites, of the size and tenure local households need.
8. **Residents' questions:** that the Council answers the questions on Warren Lane (CH03), empty homes and housing numbers in its report to you.
9. **Process:** that all representations received by 5pm on 28 October are accepted in full.
10. **A pause:** that the examination is paused while this work is done.

My constituents have engaged with this process in good faith at every stage. They are not opposed to new homes. They want homes that are fairly distributed, built where the transport and services exist to support them, and that protect the farmland and countryside that define our communities. The evidence published for this consultation shows that the Plan, as it stands, does not yet achieve that balance in Penistone and Stocksbridge. I urge you to take this opportunity to put it right.

I would be grateful to be notified of the publication of your report and of the adoption of the Plan at the address above, and I would be happy to provide any further information that would assist you.

With best wishes,

Dr Marie Tidball MP
Member of Parliament for Penistone and Stocksbridge