

28 October 2026

Dear Inspectors,

Sheffield Plan Examination – Representation on the Further Main Modifications Consultation. Community Facilities at Strategic Location 1 (Handsworth): SES29 and SES30

FMM23 (Policy DC1); September 2026 Sustainability Appraisal note, Appendix A, p. 30 and Appendix B, paras 3.2–3.3; Council response in EXAM 217C, item 10.1

1. Summary of representation

This representation concerns the Council's response to the Inspectors' question about community facilities at Strategic Location 1 (Handsworth), published after my May representation, reference 5.0463.

The Council says that small-scale meeting rooms could be accommodated "if a need is identified" and would not materially affect site capacities. Its response identifies neither an assessment of the community-facility provision this development needs nor the arrangements securing its delivery. Its reassurance about capacity therefore depends on an unexplained assumption that the required facilities will be "small scale".

The Council cannot give community-facility benefits weight in selecting Handsworth while leaving their assessment and delivery unresolved.

The September Sustainability Appraisal note continues to rely on "other factors in the planning balance" and published site-selection evidence to conclude that the allocations remain appropriate. The Council's new response exposes a gap between the strategic-growth rationale informing the choice of Handsworth and the community-facility provision secured for it. My earlier representation provides the background; this representation addresses that subsequent response and its implications for the Council's renewed conclusion.

This representation maintains my objections to the Green Belt allocations, particularly SES29 and SES30 (representations 1.1892, 3.0650 and 5.0463). If the Inspectors retain them, the community-facility assessment, delivery requirements and any consequential capacity implications must be resolved.

2. Relevant evidence

- **September 2026 Sustainability Appraisal note, Appendix B, paras 3.2–3.3:** the Council maintains, in its site selection addendum on updated agricultural land data, that the proposed allocations remain appropriate, taking account of the full suite of evidence and the other factors in the planning balance.
- **FMM23 (Policy DC1), Schedule of Proposed Further Main Modifications, p. 17:** AM135 stated that additional guidance on the Community Infrastructure Levy and developer

contributions would be set out in a Supplementary Planning Document "that will seek to maximise social value benefits arising from new development" (Schedule of Proposed Additional Modifications, p. 30). FMM23 replaces "a Supplementary Planning Document" with "local planning guidance". Its text does not include the social value clause, and the schedule does not show that clause as deleted. The Sustainability Appraisal note's screening of FMM23 states: "Though the status and naming of guidance is different, it is unlikely to lead to a significantly different outcome in terms of strategic effects" (Appendix A, p. 30).

- **EXAM 217C, item 10.1, PDF page 28:** the Inspectors asked the Council to respond to my representation about community facilities at SES29 and SES30 as a combined strategic location. The Council's response, dated 8 July 2026, states:

  "In terms of other community facilities such as small-scale meeting rooms, we are confident that these can be accommodated as part of the overall site layouts if a need is identified. As they are small scale, they would not materially affect the site capacities."

- **IIA Update and Addendum, February 2026, paras 7.1.10–7.1.11, pp. 32–33:** the IIA identifies new social infrastructure among the benefits supporting its strategic-growth approach. It applies its scale assumptions to individual sites or combinations of sites and expressly cites the SPD's community-facilities requirement.
- **IIA, paras 7.5.6–7.5.11 and Table 7.6, pp. 63–64:** when narrowing the choice of locations, the IIA identifies strategic-growth benefits as relevant to the planning balance. Handsworth appears in the resulting list of reasonable strategic alternatives. Under the more restrictive Scenario B, which the IIA did not apply because it would "make it difficult to factor in benefits that could be achieved through strategic growth", only Strategic Locations 3 and 6 would remain (paras 7.5.9 and 7.5.11).

3. Soundness concern

The September conclusion that the allocations remain appropriate relies on other factors in the planning balance and the published selection evidence. The IIA expressly treats strategic-growth benefits as relevant to the choice between locations. The adequacy of the Council's subsequent answer therefore matters to the justification for selecting Handsworth, as well as to the design of the development.

The new response leaves a fundamental gap in that reasoning. Community-facility provision forms part of the rationale for pursuing strategic growth, yet the Council identifies no assessment of the combined development's community-facility needs, no resulting provision strategy and no arrangements securing delivery. The land it cites for a school and burial ground meets citywide needs that would exist without these allocations (EXAM 128A, paras 3.2.4 and 3.5.7). It answers a question about the provision needed for a community of 1,697 homes with an assurance that "small-scale meeting rooms" could fit.

The 1,000-dwelling threshold does not prescribe the precise facility or its size. Those matters require assessment against existing provision. But the Council's guidance establishes an expectation of provision at this scale, and the IIA invokes that expectation when explaining its strategic-growth approach. The Council's reply identifies neither the assessment nor an explained outcome.

The reference to small meeting rooms is also consequential. The Council expressly relies on their assumed small scale to conclude that site capacities would not be materially affected. Yet its response identifies no assessment establishing that small meeting rooms would meet the combined development's needs. The capacity conclusion therefore depends on the very question the Council has left unanswered: what provision is actually required?

The necessary provision must be established and then accommodated. If the assessment identifies requirements which cannot be met within existing land allowances or through suitable, deliverable off-site provision, the implications for layout, developable area and housing capacity must be addressed. Maintaining the preferred housing capacity is not a justification for assuming that the facilities needed to support those homes will be small.

The Council describes the secondary school and burial ground as "community facilities". It gave this answer to the Inspectors on 8 July 2026. The Plan's glossary, the Council's SPD and IDP, and the NPPF classify these uses as follows:

	Plan glossary (MM468)	**Council's CIL and planning obligations SPD (2015)**	**IDP Part 2 (2023)**	**NPPF 2023, chapter 8**
Secondary school	Not listed	Separate heading: Education (GE1–GE2)	Separate category: Education	Separate: school places (para 95)
Open space	Not listed	Separate heading: Open Space (GOS1–GOS2)	Separate: Green infrastructure	Listed as a community facility (para 93)
Burial ground	Not listed	Not mentioned	Listed as "Community facilities – Burial sites and crematoria" (CF01)	Not mentioned

Of these four sources, only the IDP treats a burial ground as a community facility, and none treats a secondary school as one.

The Council's reference to a secondary school and burial ground does not complete the answer. Those uses can provide public benefits. The Council must nevertheless explain which community-facility needs they address and what provision remains necessary. Its own infrastructure evidence reserves the school land "in the event that this is required", prefers extensions to existing schools, and forecasts a surplus of secondary places in the Southeast planning area by the time these homes are built (EXAM 128A, scheme ED11 and para 3.2.10). Safeguarding land does not itself demonstrate delivery, nor does it establish arrangements enabling residents to use a school for wider community purposes. Calling the proposals community facilities does not demonstrate that they satisfy the requirement.

The continued allocation of SES29 and SES30 is therefore not adequately justified in this respect: the Council has not demonstrated that the community-facility benefits supporting its strategic-growth approach are deliverable at Handsworth.

It is also not demonstrated to be effective: the response identifies no coordinated provision or delivery strategy, while asserting that capacity would not be materially affected.

A requirement for future masterplanning does not cure this gap. Detailed design can follow, but the examination must establish what provision is needed, how it can be delivered and what this means for capacity. Strategic designation must be matched by strategic planning for the community facilities relied upon.

FMM23 widens the gap. Current guidance establishes an expectation of community-facility provision at this scale, and the IIA invokes that expectation. FMM23 changes the status of future guidance on developer contributions and no longer states that this guidance will seek to maximise social value benefits arising from new development. The Sustainability Appraisal note's screening addresses the change of status and name but does not mention the omitted clause. With that guidance changed in status and without a stated social value aim, the allocation requirements in MM410 and MM411 are where the community-facility provision relied on in selecting Handsworth must be secured.

Other authorities name community facilities for allocations of a similar scale:

Allocation	Homes	Community facilities named	Assessment and delivery
Cheshire East, Site LPS 33, Handforth East (adopted 2017)	Around 1,500	Local centre including "Community centre and other community uses"	Delivery plan for the "timing of provision of the local centre and other community facilities and infrastructure" (criterion b); management plan (criterion r)
Calderdale, Brighouse garden suburbs LP1451 and LP1463 (adopted 2023)	1,257 and 1,998	Masterplans expected to include "community facilities and services to serve the new development" (Policy IM7 VI(l))	Council-commissioned masterplans adopted as an SPD (IM7 V); "assessment of the impact of the development on existing and planned infrastructure" (IM7 VI(j)); management plan (IM7 VII)
Rotherham, Bassingthorpe Farm (council web page)	Up to 2,000	"a local centre" and "community facilities", listed separately from the primary school	Not stated on the page
Sheffield, SES29 and SES30 (MM410, MM411)	1,697	None; land safeguarded for a secondary school and burial ground	No requirement to assess or deliver community facilities

MM410 and MM411 contain no equivalent requirement.

4. Primary request

I request that the Inspectors require the Council to resolve this deficiency before concluding that the allocations remain justified and effective.

The Council should identify:

- the assessment of SES29 and SES30 together, including existing community facilities and the additional demands generated;
- the resulting requirements for the type, scale and location of provision;
- how the school and burial proposals satisfy any part of those requirements;

- the land requirements and implications for developable area and housing capacity; and
- the arrangements securing delivery, including responsibility, funding and timing.

If the Council concludes that no additional provision is necessary, it should publish the supporting evidence and explain how that is reconciled with GCF2 and the IIA's strategic-growth rationale.

I have found no assessment of the capacity of existing community centres, meeting places or libraries in Handsworth. The IIA's appraisal of Handsworth covers schools, GP services, shops and open space (Appendix G, pp. 240–241). The IDP maps existing facilities but says it "may be beneficial to undertake a more comprehensive review of facility quality and gaps in provision" (Part 1, p. 69).

The Council should identify the weight given to community-facility benefits in preferring Handsworth. Where those benefits are not substantiated, it should reassess the comparison with reasonable alternatives using only the benefits supported by evidence and delivery arrangements. If SES29 and SES30 cannot be justified on that corrected basis, they should not be retained.

5. Consequential changes required

Following that assessment, the Inspectors should require the Council to:

1. Amend the allocation requirements (MM410 and MM411) and the IDP infrastructure schedule to identify and secure necessary community-facility provision.
2. Review the developable areas and housing capacities where provision cannot be accommodated within existing assumptions, updating Policy SA5 (MM68), the relevant supply figures and trajectory where necessary.
3. Update the appraisal and site-selection justification, including the comparison with reasonable alternatives, to reflect the community-facility benefits supported by evidence and delivery arrangements.
4. Identify delivery milestones and monitoring arrangements for the required facilities.

Any material new evidence or proposed changes relied upon to resolve this issue should be made available for comment before the examination concludes.

6. Conclusion

The Council's subsequent response has not resolved the community-facilities concern. If the community-facility benefits supporting the strategic-growth case are not substantiated and secured, the justification for preferring Handsworth must be reconsidered.

The needs of the proposed community must inform the development's provision and capacity. They must not be left conditional on what can conveniently fit around a predetermined housing figure.

I request that this matter be resolved before the examination concludes, with the necessary changes to provision, capacity and the justification for retaining the allocations.

Yours faithfully,

Michael Parkin