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28 October 2026

Dear Inspectors,

Sheffield Plan Examination - Representation on the Integrated Impact Assessment Sustainability Appraisal note (September 2026), Section 5 and Appendix B, and on Proposed Further Main Modifications FMM27 and FMM30: using the Defra predictive agricultural land map at the level it supports

1. Summary of representation

This representation concerns Section 5 of the Integrated Impact Assessment Sustainability Appraisal note (September 2026, corrected version); its Appendix B, the Site Selection Addendum on agricultural land (also EXAM 219); FMM27 (NWS31) and FMM30 (SES10), which delete the two remaining site requirements for agricultural land surveys; and the note's Appendix A, which screens those deletions as "No significant effects likely" (pp. 32-33).

The Inspectors asked for this work in July (EXAM 217C, paras 19-22). The Council has applied Defra's new predictive agricultural land map to the assessed sites and strategic locations. The map improves on the provisional dataset it replaces. The concern is how its stated limits have been applied.

Defra and the Council both describe the map as a strategic tool. At that level, the Sustainability Appraisal note rates Handsworth and four other locations moderate negative, but says this does not change the strategic choices. At the site level, the Council's scores are used to set alternatives aside and confirm the allocations. FMM27 and FMM30 then remove the remaining survey requirements, without explaining why detailed evidence is no longer needed.

Section 5 and Appendix B of the Sustainability Appraisal note publish scores without the measurements behind them. Each assessed site receives a yes-or-no score for whether best and most versatile (BMV) land is predicted to be present. No site, location or growth option, or the Plan as a whole, is given a predicted BMV area in hectares, an area breakdown by grade, or a map showing the predicted grades within its boundary.

The map should be used to compare the strategic locations, and the choice and order of Green Belt release should be shown to take account of that comparison alongside other factors. Where detailed survey evidence is lacking, the Plan should require it, with measures to reduce harm based on what the survey finds. The note does not adequately explain the first, and FMM27 and FMM30 remove the remaining requirements for the second.

This representation maintains my objections to the Green Belt allocations, particularly SES29 and SES30 (representations 1.1892, 3.0650 and 5.0463).

2. Evidence

Table 1. The predictive map at the two levels at which the Council has used it.

	Strategic locations	Individual sites and parcels
What the map is suited to	"suitable for high-level planning" (Appendix B, para 1.2); "strategic or indicative purposes" (Defra)	"not necessarily for determinative use at individual parcel level" (Appendix B, para 1.2); "should not be used at field-scale" (Defra)
How the note uses it	Updates the ratings of 13 housing locations (Table 5.1) and 8 employment locations (Table 5.2)	Gives every assessed site a score of YY or N (Appendix B, paras 2.1 and 2.3; Appendices 1-5)
What is published	A rating and a short comment; no predicted BMV area (Tables 5.1 and 5.2)	A score of YY or N; no areas by predicted grade or overlay maps (Appendices 1-5)
What the result decides	Strategic choices unchanged; the new data "affects the findings, rather than any fundamental decisions" to exclude locations (para 5.9)	Scores support rejection of alternatives alongside other reasons (Appendix B, para 2.7), and retention of allocations (para 3.3).

2.1 What Defra and the Council say the map is for

Defra's blog of 13 April 2026 said the predictive map "should only be used for strategic or indicative purposes, and it should not be used at field-scale"; that it "does not replace the need for detailed field-based ALC surveys"; and that it can help to target surveys where BMV land is predicted. It is already in the examination: representation 5.0467, Enclosure 1, Appendix 1 (letter, footnote 13).

The project report on the map (Cranfield University for Defra, project RDE118, July 2025, p. 5) expects survey evidence to support local plans and planning applications where BMV agricultural land is an issue. It also expects detailed surveys of proposed development sites unless otherwise agreed with Natural England.

The Council acknowledges the same limit at parcel/site level (Appendix B, para 1.2; Table 1). It also says site surveys would have been needed to establish actual grades within Grade 3 land in the earlier data (para 1.1). The Council describes the same limits as Defra, in softer terms.

2.2 How the map has been used at the strategic level

Table 5.1 re-rates the 13 housing locations. Five locations are now moderate negative, the worst rating in the table. The note then says the change does not alter which strategic locations remain reasonable options:

- Para 5.9 says the new data "affects the findings, rather than any fundamental decisions" to exclude locations. Para 5.17 similarly says it would not have a significant bearing on the process for establishing the preferred reasonable strategic alternative.
- "It could be argued that the four strategic locations that perform clearly worst (with the highest quality agricultural land) with regards to the land and soil objective should not be

prioritised in the order of Green Belt release (given directions in the NPPF to look for land of lesser sensitivity). However, these locations perform well in other aspects of sustainability, and it would not be appropriate to rule them out as part of the strategic options appraisal on this factor alone" (para 5.18).

Para 5.18 does not identify which four locations it means. Table 5.1 gives five the same worst rating of moderate negative: Handsworth, West of Mosborough, Owlthorpe, Grenoside / Ecclesfield and Birley Edge. The Council should clarify this discrepancy. Other sustainability factors could justify choosing higher-quality land, but the note does not explain, for each location, how those factors outweigh the greater soil harm.

The fact that agricultural land quality was not the primary driver of the earlier strategy does not explain why the new evidence should have little effect on the choice of locations. The Council needs to keep an open mind and show that it has reconsidered those choices in light of the higher predicted land quality, and explain why selecting higher-quality land remains justified. Para 5.17 does not itself provide that explanation.

The IIA already describes a way to respond to significant effects, with three outcomes: "No change required", "Remove sites from the strategic location" and "Discount the strategic location altogether" (IIA Update and Addendum, February 2026, para 7.5.3, p. 61). The parcel tests cover landscape, Green Belt, biodiversity and flood risk (para 7.5.2). Appendix F records agricultural land as "Not likely to be a significant constraint", noting "Insufficient data/land surveyed for consistent appraisal of each site", and gives the method's output as "% and area overlap with asset" (parameter 6, pp. 235-236). The September note does not revisit those choices in light of the worse soil findings.

The September note should explain whether that approach remains justified in light of the higher predicted land quality.

2.3 How the map has been used at the parcel level

Appendix B asks whether the sites now predicted to be of higher quality remain suitable, or whether poorer-quality alternatives would be more suitable (para 2.6). It uses site scores, alongside other factors, to support its choices:

- the eight shortlisted sites not allocated "are now assessed as being higher quality agricultural land (N). On this basis, and when considering the wider reasons these sites were not deemed appropriate for allocation, they are not considered to provide a better choice" (para 2.7);
- eleven non-shortlisted sites now scored N "would not therefore have provided a preferential choice for shortlisting with reference to the agricultural land assessment" (para 2.8);
- "proposed site allocations in the Plan remain appropriate" (para 3.3).

Those wider reasons do not show how much predicted BMV land would be affected or explain why choosing higher-quality land is justified.

FMM27 and FMM30 then delete the agricultural land survey condition from NWS31 and SES10 "For consistency with other similar site allocations" (FMM Schedule, pp. 18-19).

The Inspectors have recorded the reasoning behind deleting survey conditions: they "have been omitted/removed from site allocation policies on the basis that these matters have been addressed through the site assessment/selection process" (EXAM 217C, para 22). MM184 rests on the same

reasoning: it permits development on best and most versatile land "where the site is allocated", "to reflect the fact that agricultural land value has been taken into account when deciding whether to allocate the site" (Schedule of Main Modifications, March 2026, p. 48).

The Inspectors made the remaining deletions conditional on their being found justified in light of the further assessment (EXAM 217C, para 22). The Council had proposed them on 8 July for consistency with other allocations, before that work was done (EXAM 217C, Council's response, section 2, p. 20). Neither Section 5 nor Appendix B explains why the new evidence makes these survey requirements unnecessary.

2.4 What the further work publishes, and what it does not

Appendix B lists every site with two agricultural land columns: "Assessed ALC Indicator Score" and "Updated ALC Indicator Score". The score is a presence test. Under the criteria reproduced in Figure 1, a site scores N if it "May have some Grade 1, 2 or 3a land", and YY if it is "Likely to be Grade 3b, 4, 5, urban or non-agricultural land". The "Significant negative impact (NN)" column has no criterion, so no site can score worse than N under this indicator. A site with a sliver of predicted BMV land and a site that is almost all of it receive the same score, and the score does not distinguish Grade 2 from Grade 3a.

Across Section 5 and Appendix B there is:

- no predicted BMV area in hectares or percentage for any site, strategic location or growth option, or for the Plan as a whole. The national percentages in Appendix B para 1.2 do not quantify the local effects;
- no map. The only figure in Appendix B is the scoring table (Figure 1). No plan shows the predicted grades within any site or location boundary;
- no statement of which release of the dataset was used. Appendix B describes the data as "created in August 2025 and published initially in October 2025" (para 1.3); Defra's blog of 13 April 2026 announced "a new and updated version";
- no figures behind the descriptive words: "mostly 3a and some Grade 2" (Table 5.1), "relatively small scale of loss" (para 5.12), "small pockets amongst predominantly Grade 3 land" (para 5.32).

The Council says the extent of likely BMV land "can now be mapped" (Appendix B, para 1.2). The note publishes neither maps nor measurements of that extent. Representation 5.0467, which the Inspectors cite at EXAM 217C para 19, enclosed overlays of the predictive map on the Green Belt allocations in May 2026. The Council's further work contains none.

Indicative measurements at the strategic level show differences the ratings do not. Appendix A sets out predicted hectares for each housing location. The measured part of Handsworth contains 101.89 ha of predicted BMV land, about a third of the total measured across the thirteen housing locations. Two locations have no predicted BMV land within the measured boundaries.

3. Soundness concern

The tests. NPPF September 2023 para 175 says plans should "allocate land with the least environmental or amenity value, where consistent with other policies in this Framework". Footnote

58 adds: "Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality." The Inspectors have noted that the Plan as proposed to be modified "includes a significant amount of housing and employment development on agricultural land" (EXAM 217C, para 19). The September note accepts that, in isolation, the cumulative loss of predicted Grade 2 and 3a land "could give rise to moderate to major negative effects" (para 5.5).

Step 1: footnote 58 calls for a comparison of land quality. The preference for poorer-quality land in footnote 58 to para 175 applies when choosing which land to allocate for development. The predictive map supports that comparison at a strategic scale.

Step 2: the effect of the comparison on choices is not shown. Para 5.17 does not show whether poorer land was preferred, or why higher-quality land was retained.

Step 3: the question of actual grades is still open. A site score read from the predictive map cannot settle the grade of a field. The map can inform the comparison of site options, but using the scores to set alternatives aside (paras 2.7 and 2.8) and confirm allocations (para 3.3) does not explain why surveys are no longer needed.[1]

Step 4: a presence test does not quantify the comparison. The Inspectors asked the Council to "clarify what effect the findings have on the site selection work and whether areas of poorer land quality have been selected", or explain why higher-quality land is justified (EXAM 217C, para 21). Appendix B para 2.7 sets aside the eight shortlisted sites because they score N and for wider reasons; nine allocation parcels also score N (para 2.6). No published measurements show the differences in predicted grades and areas between them. Paras 2.9-2.12 also refer to other reasons for rejecting poorer-quality sites. Those reasons need to be weighed against a comparison that representors and the Inspectors can test.

Step 5: the Plan should ensure that missing survey evidence is obtained. A survey before allocation can inform site choice. A survey required with a planning application can inform layout and soil management, though it cannot replace the comparison needed before allocation. The further work identifies no detailed ALC surveys of the Green Belt allocations. FMM27 and FMM30 would remove the two remaining explicit site requirements. Surveys could still be requested at application stage, but the site policies would no longer require them. The note quotes "the outcome of detailed soil surveys" (para 5.3), without confirming that any have been undertaken, yet its Appendix A screens the deletions as "No significant effects likely".

The affected allocations and the removal of survey requirements have not been adequately justified (NPPF paras 31 and 35(b)). Nor has the Council shown that poorer-quality land was preferred, or why choosing higher-quality land is justified (para 175, footnote 58 and para 35(d)).

[1] Natural England's guidance, updated 24 July 2026, sections 5-7, says the maps are unsuitable for assessment of individual fields or sites and detailed survey may be needed where existing evidence is insufficient: https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land

4. Requests

The Inspectors are asked not to accept the note's conclusion that the allocations "remain appropriate" (Appendix B, para 3.3), and not to recommend FMM27 and FMM30, until the Council has published the measurements behind its conclusions, properly compared the strategic options and explained how detailed survey evidence will be secured:

1. **At the strategic level:** publish predicted hectares by grade for each location in Tables 5.1 and 5.2, using the "% and area overlap with asset" approach described in the IIA; name the "four strategic locations that perform clearly worst" (para 5.18); and for each location rated moderate negative, either apply the para 7.5.3 procedure to soil or set out, location by location, what outweighs the finding. The choice and order of Green Belt release should be shown to take account of that comparison alongside other factors.
2. **The data behind Appendix B:** for every allocation and every site in Appendices 3 and 4, publish the predicted hectares in each grade and the share of the site; maps showing the predictive data against the site boundaries; and the dataset release and boundaries used. Representors should be able to comment before the Inspectors' final report.
3. **At the site level:** do not recommend FMM27 and FMM30, so that the survey requirements on NWS31 and SES10 remain. The Schedule's reason, "consistency" with other allocations, can be taken in either direction. The evidence supports keeping the requirement and applying it to the other allocations where the map predicts BMV land.
4. **The Appendix A screening of FMM27 and FMM30 should be revised.** Survey results and records of land developed would allow monitoring of BMV land lost to development. The 2022 and 2025 IIAs proposed it (Table 12.1); the February 2026 IIA does not include it.

If, once the strategic comparison is made, the Council cannot show what outweighs the soil finding at Handsworth, SES29 and SES30 are not justified, and MM410 and MM411 should not be adopted, with consequential changes to MM68, MM127, MM461A, the supply tables and Policies Map. This request responds to Appendix B para 3.3, which concludes that the allocations remain appropriate.

5. Conclusion

Defra and the Council agree that the predictive map supports strategic comparisons, and both caution against using it to establish actual site-level grades. The Council uses site-level predicted grades to support the additional site allocations, while FMM27 and FMM30 remove the remaining survey requirements. Section 5 and Appendix B of the September 2026 note publish no predicted BMV areas in hectares against which to check those conclusions.

If the Inspectors retain the additional site allocations, their report should explain the comparison on which they found that poorer areas of land were preferred, or why choosing higher-quality land was justified. If FMM27 and FMM30 are recommended, it should explain how the grade of the land present will be established after the explicit survey requirements are removed.

Yours faithfully,

Michael Parkin

Appendix A. Predicted best and most versatile land by housing strategic location

Ratings are from the September note, Table 5.1. Hectares are calculated by overlaying the Defra Predictive Agricultural Land Classification Map (GeoPackage last changed 6 July 2026) on the parcels the IIA lists for each location (Appendix G), with overlaps counted once, using the Council's Green Belt Review 2024 parcel layer. BMV land is predicted Grades 1, 2 and 3a; none is predicted Grade 1. These are strategic Land and Soil ratings, separate from the YY/N scores for individual sites.

Location	Strategic Land and Soil rating (Table 5.1)	Area measured (ha)	Predicted BMV overlap (ha)	Predicted BMV overlap (%)
1. Handsworth	Moderate negative	118.08[2]	101.89	86
2. West of Mosborough	Moderate negative	73.20	58.59	80
3. South of Birley Estate	Minor negative	53.01	36.70	69
4. Owlthorpe / Mosborough	Moderate negative	46.35	35.93	78
10. Birley Edge	Moderate negative	46.31	30.52	66
5. Beighton	Minor negative	15.89	14.36	90
9. Grenoside / Ecclesfield	Moderate negative	45.00	11.61	26
6. Norton / Charnock	Minor positive	11.12	7.29	66
12. South of Deepcar	Neutral	57.11	5.87	10
13. Oughtibridge / Wharncliffe Side	Minor negative	14.77	5.18	35
11. Worrall / Middlewood	Minor negative	47.13	4.69	10
7. Dore / Whirlow	Minor negative	81.60	0.00	0
8. South of Chapeltown	Minor negative	44.69	0.00	0

Table ordered by predicted BMV overlap (ha). The method and data are available on request.

Other sources cited: Defra, *Unlocking the National Soil Map: free and unrestricted access to England and Wales's most comprehensive soil data*, Defra Environment blog, 13 April 2026 (also at representation 5.0467, Enclosure 1, Appendix 1); Cranfield University for Defra, *Development of a Predictive Agricultural Land Classification Map for England*, Final Report, project RDE118, July 2025; Defra, Predictive Agricultural Land Classification Map for England, GeoPackage (last changed 6 July 2026); Natural England, *Guide to assessing development proposals on agricultural land*, updated 24 July 2026; Defra, *Construction Code of Practice for the Sustainable Use of Soils on Construction Sites*, 2009; NPPF, September 2023.

[2] Parcel S03651 at Handsworth is not in the Council's parcel layer, so the Handsworth figure covers nine of its ten parcels and is a lower bound for the predicted overlap.