Sheffield Plan Examination

Further Main Modifications

Representation of the Sheffield Green Belt Alliance

28 October 2026

Documents this representation concerns. The Integrated Impact Assessment (IIA): Sustainability Appraisal note (September 2026), particularly paragraphs 2.7 and 2.9 and section 5; EXAM 130C and EXAM 219; FMM5; the changes to additional Green Belt allocations in FMM6, FMM7, FMM26–29 and FMM31, with Policies Map changes 2, 3 and 4 at NWS30, NES38 and SES29; and FMM30's removal of an agricultural survey condition. Other modifications addressed are listed in Appendix A.

The Sheffield Green Belt Alliance brings together residents' groups and campaigns from across the city: *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.* This representation addresses the FMM consultation documents and the examination record on which the Inspectors are now asked to rely.

Sheffield has had no new local plan since 2009. A plan is needed. Homes are needed. The Inspectors said the city needs 38,012 homes by 2039, and that the Plan submitted in October 2023 could not be approved as it stood. We recognise the need to meet that requirement. [3, 6]

We want a Plan that provides the homes and jobs Sheffield needs and the services that make neighbourhoods work. Residents should be able to follow the evidence showing how much Green Belt is needed and how those services will be delivered.

In summary

The Council has chosen to meet part of Sheffield's housing need through Green Belt release. The Inspectors said the first step was to look at additional capacity in built-up areas. We have not found a published account drawing that evidence together and showing how much release is still needed.

The documents also reduce safeguards and leave important questions about local facilities unresolved. At Handsworth, community facilities helped support the choice of a large development, yet their provision remains uncertain. Residents need clear answers about what will be provided and when.

We ask the Inspectors to require a clear account of the urban evidence, an explanation of each reduced safeguard and firm arrangements for necessary infrastructure before confirming the modified Green Belt allocations. Residents should have a meaningful opportunity to respond to that evidence.

1. The change in strategy needs a clear explanation

Paragraph 2.7 of the September 2026 Sustainability Appraisal note says reasonable alternatives "have been considered throughout". [5] The history below explains why residents still need a clear account of the change from an urban strategy to Green Belt release.

In 2015 the Council consulted on where housing in Sheffield should go. Its September 2020 consultation document recorded the response: "Sheffielders said loud and clear that they don't want to see building on Sheffield's countryside and the Green Belt." The Cabinet Member who wrote that added that he did not want to see it either. [1]

In 2020 the Council offered three spatial options under Regulation 18, the stage for asking what a plan should contain and where growth should go. Option A would provide about 40,000 homes within the urban area, without Green Belt release. Of those who answered, 71% chose Option A. [2]

That consultation established a clear preference among respondents for growth within the urban area. It was the last time the public was asked that question.

In February 2025 the Inspectors raised the requirement to 2,236 homes a year and recorded a shortfall of some 3,539 homes. They called greenfield Green Belt release **"a significant departure from the spatial strategy which has informed site option work to date"**. [3]

The Council did not return to Regulation 18. The Strategy and Resources Policy Committee voted to proceed with fourteen Green Belt sites for housing and employment on 30 April 2025, followed by Full Council on 14 May. The subsequent consultation allowed challenges to soundness and legal compliance, including the case for release, but did not ask whether Green Belt should be released. [4, 18]

Now the Sustainability Appraisal note says no additional appraisal work is "considered necessary or proportionate". [5] The FAQ says this consultation "is not an opportunity to comment on other aspects of the plan" and tells residents not to resubmit earlier objections. [6, 9]

A higher housing requirement can require a different strategy. Residents need to understand why the urban strategy could no longer meet that requirement, what alternatives were tested and how their views informed the change. The Inspectors found consultation to date legally compliant in January 2026. [19] That does not explain why the public's preference for an urban strategy was set aside without reopening that choice. Consultation on whether the resulting Plan is sound does not answer that concern.

We ask the Inspectors to explain how engagement on the changed strategy meets the Council's Statement of Community Involvement, and **whether the departure required further consultation under Regulation 18. If it did not, their report should explain why.** [8]

Councillor Penny Baker told the Full Council meeting of 14 May 2025 that a council which asks people their opinion should listen to the answer. [4] That is our point.

2. A Plan weaker than the one the Councillors voted on

This section concerns FMM5, FMM14, FMM18, FMM27, FMM29 and FMM30, and paragraph 2.9 of the Sustainability Appraisal note. The March 2026 changes are cited as context only.

When Full Council voted to add fourteen Green Belt sites, the Plan included ten metre watercourse buffers, a single infrastructure delivery plan on strategic housing sites, and on-site play space for schemes of fifty homes. The sites remain, but these and other safeguards have since been weakened through two rounds of modification.

The changes affect how development will work. A requirement to produce and implement a single infrastructure delivery plan becomes an expectation to produce one "Where appropriate". The usual trigger for on-site play space changes from fifty homes to two hectares. These changes need an explanation of how the necessary provision will still be secured. [38]

Appendix A follows nine reductions across both rounds and records the reasons and examination requests behind them. Those records help trace each change. The central question is whether the revised safeguards provide adequate protection. [10, 11]

1. The National Planning Policy Framework (NPPF), paragraph 179(a), asks plans to "Identify, map and safeguard" wildlife corridors and stepping stones that connect designated sites. Other ecological protections remain, but we have found no map of those links in the consulted Plan. The standard allocation condition asks developers only to "Explore opportunities" for ecological corridors. [12]
2. Footnote 58 prefers poorer quality farmland where significant development of agricultural land is necessary. The Inspectors made removal of the NWS31 and SES10 survey conditions conditional on justification. The Council cites "consistency", although new Defra data predicts both sites to be higher quality land. The reason for removing the surveys still needs to address that evidence. [13]

The former Council Leader said that a future review would consider sites elsewhere in the city. That gave no commitment to reconsider these Green Belt allocations. The evidence, facilities and safeguards secured by this Plan must therefore be sufficient now. [31]

For each reduction, the Council should explain why the protection is no longer needed or how it will be replaced. A short phrase in a reason column does not answer that question.

3. How much housing can the urban area provide

NPPF paragraph 141 says the Council "should be able to demonstrate that it has examined fully all other reasonable options", including brownfield and underutilised land, density and neighbouring authorities. The Inspectors returned to that question in June 2026, for urban sites promoted in May 2025. [15]

The Sustainability Appraisal note is published for comment for the first time in this consultation, with EXAM 130C as background. Their conclusions bear directly on the modified Green Belt allocations and FMM22.

In February 2025 the Inspectors said: "As a first step this would involve looking at additional capacity in built-up areas." Site options work "may need" a review of urban capacity, Green Belt evidence and Sustainability Appraisal. The Council Leader later told Full Council that officers had reviewed capacity and densities. The underlying updated housing calculations should be identified and published. [16, 31]

For employment land, EXAM 129A reviews urban intensification and re-use, and the Inspectors accepted a further ten hectares of urban windfall. [17] For housing, later documents still do not draw the capacity evidence together in a comparable way.

- *February 2025.* EXAM 120 says the first step in exploring further housing sites would be to look at additional capacity in built-up areas.
- *May 2025.* EXAM 124 proposed the Green Belt sites and said capacity elsewhere was insufficient, without an updated housing capacity calculation. [18]
- *January 2026.* The Inspectors accepted exceptional circumstances and the site selection and density evidence, reserving full reasoning for their final report. Their later queries asked the Council to consider appraising six urban sites put forward by landowners and developers. [15, 19]
- *September 2026.* EXAM 130C appraises six promoted urban sites but recommends no new allocations. The Sustainability Appraisal note sees no need for further appraisal. [20]

The Council's answer is that new urban sites would fall within the windfall allowance already in the Plan. Its July response also interpreted the Inspectors' request as covering only sites promoted by landowners or developers, excluding suggestions from community groups or third parties. EXAM 130C repeats the windfall conclusion. [39]

Windfall counts towards supply, and we do not ask for the same homes to be counted twice. But the windfall allowance is an estimate of homes from sites not specifically identified in the plan. It is not a limit on what the urban area can provide. Once sites are identified, the Council can test whether they were already expected within that estimate or add to it. It should do so, using the capacity studies, later site evidence and realistic densities. [39]

As communities facing proposals to release Green Belt land, we need to know how much of that release could be avoided. Calling a site windfall does not show whether it

changes the shortfall, housing mix, delivery timing or amount of land needed. EXAM 130C does not show how the six sites relate to the allowance. [39]

The FAQ says brownfield options have been explored, including taller buildings in the city centre. [6] Appendix B of this representation examines the evidence and identifies the information needed to understand how much capacity remains.

The Council's Central Area capacity study, CC02 (July 2020), calls its output "an initial quantum" and leaves Gap Sites and Future Potential Sites unassessed. They total about 29.6 hectares: land area, not extra homes, and some has since been allocated in the Plan. [21]

CC02 called for a tall buildings strategy in 2020. We have found no published strategy six years on. FMM22 defers Tall Building Areas to future guidance without a timetable. [22]

Outside the Central Area, most urban sites without permission are assessed at the bottom of Policy NC9's density ranges. The assessment calls these "conservative estimates of capacity". We found no density monitoring after 2021/22 in the sources checked to test whether achieved densities warrant those capacity estimates. [23]

In 2020 the public was offered about 40,000 urban homes to 2038. The September 2026 note gives 31,822 for "Urban capacity, brownfield only" in 2022–2039. [24] These are not like-for-like figures: the land, periods and assumptions differ. We have found no published account explaining those differences. That account is needed to understand how an urban strategy became one requiring Green Belt release.

The Council now intends to update its Brownfield Register *after* the Inspectors' report. [7] That does not prove extra capacity exists: the Council says its supply evidence uses the same database. Evidence that could change the amount of Green Belt needed must inform the release decision. We do not claim urban capacity can fill the 3,539-home shortfall. We seek a transparent reconciliation, using whatever combination of evidence satisfies paragraph 141, before the Council concludes no further appraisal is needed. [25, 34, 39]

4. The invitation to consider grey belt

The February 2025 letter also invited the Council to "future proof" its Green Belt evidence by identifying and appraising grey belt under the 2024 Framework. [16]

This Plan remains under the September 2023 Framework, which does not use the term. The invitation was not a direction. We found no grey belt appraisal in the site selection papers or the later agricultural land and Sustainability Appraisal documents, including the eight housing options reconsidered in September 2026. [26, 27]

Later policy gives priority to previously developed Green Belt land, then other grey belt, then other Green Belt, subject to a sustainable pattern of development overall. The Council accepts that applications will be decided under later policy and applies its Golden Rules to these housing allocations. [18, 27, 42]

The Council is now proposing to develop land predicted to be among Sheffield's best farmland, without showing whether previously developed land or other grey belt could meet part of the same need. A grey belt review might have identified alternatives and reduced that loss. We ask the Inspectors to explain how the Council responded to their invitation and why the scale of the predicted BMV loss remains necessary. [13, 16, 26, 27]

5. The services new neighbourhoods will need

We end the evidence with the people the Plan is for.

The choice of sites also depends on how new neighbourhoods will function. The Council's answer on community facilities in EXAM 217C shows why delivery needs to be settled alongside the allocations. [30]

The Green Belt allocations that include housing would place 3,771 homes at the edge of the existing built-up area by 2039. Families will need accessible schools, primary care and space to play. Where existing capacity is insufficient, provision must keep pace with occupation. Leaving its timing uncertain puts both new and existing residents at risk of overstretched schools, surgeries and play space. [25, 30]

Handsworth shows what that means. SES29 and SES30 form one strategic location of 1,697 homes. Similarly sized allocations in Rotherham, Kirklees, Calderdale and Cheshire East require a primary school, provide for a local centre and require a masterplan. Three specify schools with room for 60 children in each year group. [33] On Sheffield's assumptions, if Handsworth's homes are houses with two or more bedrooms, they would generate about 51 children per year group. [29] The Council's impact assessment treats 1,000 or more homes as sufficient to trigger a new primary school or extension, but neither allocation specifically requires either. The Council instead forecasts a surplus of primary places "across the city as a whole". That does not tell a parent whether their child will have a place at a school they can reasonably reach. [30, 41]

MM411 safeguards five hectares for a secondary school and four for a burial ground, but says alternative proposals will be considered at the first Plan review if necessary. Reserving land does not establish when the facilities will be delivered. The allocation should clarify their intended future and how any necessary provision will be secured. [30]

EXAM 130's earlier appraisal also considered increasing the housing capacity of the SES30 land to 1,005 homes if the burial ground could be provided on adjoining Council land.[1] Residents need to know whether that is still a possibility, and what would happen to the land reserved for facilities.

The Council's IIA, drawing on the Planning Obligations SPD, says: "Provision of community facilities will be required to make major residential developments

[1] EXAM 130, printed p. 40. That estimate exceeds the 1,000-home threshold used in the Council's community facilities guidance (Planning Obligations SPD, GCF2, p. 35).

sustainable".[2] The assessment used that threshold to identify strategic locations for Green Belt release, including Handsworth, and treated locations that "fall way short" of it as unreasonable alternatives. This reasoning appears in December 2022, April 2025 and February 2026. [41]

The Council now says other community facilities, such as meeting rooms, can be accommodated in the site layouts "if a need is identified". [30] Its own assessment has already identified the need for facilities to make development of this scale sustainable. Yet MM219 replaces the duty to produce and implement a single infrastructure delivery plan with "Where appropriate, they should produce" one. [38] The next step is to say what will be provided, where and how delivery will be secured. If existing facilities are sufficient, the Council should demonstrate that. [41] Its Infrastructure Delivery Plan expected no significant new community facilities because development would "largely be on brownfield sites in close proximity to existing communities". [30] The changed strategy needs an answer that reflects the circumstances, especially at Handsworth.

Residents' experience makes clear answers especially important.

Residents and tenants directly affected were not notified of the Green Belt decision. Requests for officers to attend community meetings, including through local MPs, were declined. In September 2026 the current Leader asked that further technical questions go through this consultation. We therefore ask for answers that residents can follow and respond to. [34]

In September 2026 Ruth Hubbard, founder of "It's Our City", told Full Council: [43]

> *"The Local Plan is not only a technical document, it's a social contract. By treating a revised local plan as mere corporate compliance, our council doubles down on its own neglect and lack of public accountability."*
>
> *"There is no success in getting a revised Local Plan across the line, it is unfit for purpose, if it alienates communities."*

A Plan should explain why this Green Belt is needed and how the new neighbourhoods will function. Resolving the urban capacity question, explaining reduced safeguards and securing necessary facilities will give existing and future residents a clear basis for understanding the proposals.

6. What remains to be resolved before confirmation

Public involvement, paragraph 16(c). The Inspectors found consultation to date legally compliant in January 2026. We ask their final report to explain how engagement on the changed strategy satisfies the Statement of Community Involvement and paragraph 16(c), given the history in sections 1 and 5. Section 19(3) of the 2004 Act requires compliance with that Statement. [8, 19]

[2] The SPD defines 'Major Residential Developments' as "developments providing 1,000 or more dwellings" (Guideline GCF2, definitions, p. 35). [41]

Evidence for the choice of sites, paragraph 35(b). The September appraisal and EXAM 130C do not show how much Green Belt is needed after urban alternatives are tested together. Treating new sites as windfall does not show whether they confirm the allowance or add capacity, or whether realistic density changes could reduce the shortfall. The comparison must account for housing type and delivery without double counting. It is needed to justify the amount of release against reasonable alternatives. [28, 39]

Delivery of services, paragraph 35(c). Policy NC11 and the Infrastructure Delivery Plan provide a general framework, but leave local questions unresolved. A citywide surplus of primary school places and possible GP reconfiguration do not establish accessible local capacity or when necessary improvements will be available. Safeguarded school and burial land has no delivery timetable. The allocations should secure the provision, funding and timing needed for services to keep pace with occupation. [30]

Transport raises the same delivery question. Strategic Location 1's appraisal says housing could support the business case for a new station on the line to the north. SES29 says contributions "may be required"; SES30 has no station-specific requirement. Neither ties occupation to its opening. Network Rail's response of 15 October 2026, FOI2026/01605, identifies no agreed construction programme or formal construction milestones. Where station benefits are relied on, the Council should show credible funding and delivery, with occupation triggers matched to need, or demonstrate that development remains sustainable without it. [40]

The allocations expressly apply the Golden Rules, including necessary infrastructure improvements, to housing. The allocation conditions must also secure those improvements when needed. Existing and future communities need to know that services will keep pace with development. [42]

National policy, paragraph 35(d). Paragraph 141 asks whether the strategy makes as much use as possible of suitable brownfield land and optimises density. The Council says the six promoted urban sites "would fall within that windfall allowance". Most urban capacity figures rest on the bottom of the density ranges. The Council needs to show how that evidence demonstrates the full examination of other options required by paragraphs 140–141.

Paragraphs 20(c), 34 and 73 require planning for necessary infrastructure and facilities. The local capacity and delivery gaps in the Plan need to be resolved. FMM5 follows wording proposed by the Inspectors, but the consulted Plan still does not show how wildlife corridors and stepping stones are identified, mapped and safeguarded under paragraph 179(a). FMM27 and FMM30 remove survey conditions without explaining how the new data predicting higher quality farmland has been addressed. "Consistency" does not answer the question raised by footnote 58's preference for poorer quality land. Until these gaps are resolved, we consider the allocations unjustified, ineffective and inconsistent with those policies. [12, 13, 32, 39]

7. What we ask

We ask the Inspectors to resolve the following matters in their final report and require the necessary changes before confirming the modified Green Belt allocations:

1. Do not confirm the modified Green Belt allocations (FMM6, FMM7, FMM26–29 and FMM31), or make Policies Map changes 2, 3 and 4, until the Council publishes a clear account of the urban housing alternatives. Identify the work described in EXAM 120, paragraphs 34–35, or confirm what was not undertaken. Show how windfall relates to net additional capacity and the effect on the shortfall and amount of Green Belt needed. Identify the evidence satisfying NPPF paragraph 141.
2. Explain how residents were able to consider and respond to the changed strategy, and whether the departure described in EXAM 120, paragraph 37, required consultation under Regulation 18 and the Statement of Community Involvement. If it did not, explain why.
3. Do not treat paragraph 2.7 of the Sustainability Appraisal note as resolving reasonable alternatives until the Council shows how urban land and realistic densities were tested together. As a supporting matter, explain the response to the invitation to appraise grey belt and its weight under the September 2023 Framework.
4. Require an explanation of the evidence and replacement protection for each reduction in Appendix A. Retain the protections in Appendix A4 unless a change is justified. Reassess the survey requirements in FMM27 and FMM30 against the new predictive data, as EXAM 217C, paragraph 22, contemplates. Map and safeguard wildlife corridors and stepping stones connecting designated sites while the Local Nature Recovery Strategy is awaited.
5. Require publication of the capacity, density and tall buildings documents listed in Appendix B4, with an account of the differences between the 2020 and 2026 capacity figures. FMM22 should specify when and how Tall Building Areas will be identified and consulted on.
6. Require a proportionate assessment of local school, primary care and community facility capacity for each housing allocation, with SES29 and SES30 assessed together and a joint delivery plan produced and implemented across all phases and applications. Secure necessary improvements through allocation conditions, with funding, delivery and occupation triggers matched to need. Apply the same approach where Waverley station is relied on, or demonstrate sustainability without it. MM411 should clarify the intended future of the safeguarded facility land.
7. Consider further hearing sessions where needed to resolve these matters, and explain in the final report how each was weighed.

Sheffield needs a Plan that provides homes and jobs and makes clear how new neighbourhoods will work. The evidence and delivery arrangements should give residents confidence in both.

Please require the remaining evidence to be brought together, the reduced safeguards to be justified and necessary facilities to be secured before confirming the modified Green Belt allocations. Residents should have a meaningful opportunity to respond to that evidence.

Our member groups' objections to the Green Belt allocations stand.

Sheffield Green Belt Alliance

Appendix A. Reductions in safeguards and the examination record

Page numbers are printed page numbers. "MM schedule" means the Schedule of Proposed Main Modifications (March 2026); "FMM schedule" means the September 2026 schedule. The March changes provide context for the further modifications. "No request found" means none was found in the records listed below; it does not itself establish whether a reduction is justified.

A1. Reductions without a specific request found in the records

Change	What changed	What the record shows
FMM14, paragraph 4.49	The sentence "Further guidance on appropriate opening hours in different parts of the city will be provided in a supplementary planning document" is deleted. Reason: "To reflect latest planning legislation which does not allow for the production of 'supplementary planning documents'" (FMM schedule, p. 13).	No request found. For the same reason, FMM4 keeps its commitment as "local planning guidance" and FMM9 as "practice guidance" (pp. 7–8, 11). FMM14 removes the commitment. [10]
MM192 and FMM18, Policy GS9(o)	MM192 added an exception (MM schedule, p. 210) so that more vulnerable uses, including housing, may be at ground floor level "where it has been demonstrated that any site-specific surface water risk has been effectively mitigated via a site-specific Flood Risk Assessment". FMM18 adds that the exception is "without prejudice to any other sources of Design Flood Risk". Reason: "To provide clarification and assist policy implementation" (p. 15).	No request found. EXAM 198's GS9 item MM3.23 refers to "Modifications as agreed with EA in EXAM 34", which we have not seen. [10, 11]
Monitoring of best and most versatile farmland, Sustainability Appraisal note ¶2.9	The April 2025 appraisal proposed to measure "Hectares of Best and Most Versatile Agricultural land lost to development" (EXAM 125B, Table 12.1, pp. 168–169). The February 2026 addendum drops it; land is measured only by homes built on brownfield land (Table 7.1, p. 40). The September note says "No changes are considered necessary" (¶2.9).	No request to drop the measure found. The addendum's reasons are changes to the findings and alignment with the Council's monitoring framework (¶7.1.2), which has no farmland indicator (MM221, Annex C). The monitoring measures are to be finalised in the adoption statement; as proposed, they contain no indicator that would record this loss. The September note says the cumulative loss of Grade 2 and 3a land, considered on its own, "could give rise to moderate to major negative effects" (¶5.5); the land and soil topic as a whole is scored minor negative. [35]

Change	What changed	What the record shows
Watercourse buffers, MM229, 232, 243, 253, 256, 357, 394, 396, 399 (KN03, KN07, KN36, CW15, CW21, ES02, SES04, SES05, SES10)	In each Local Wildlife Site buffer condition, "10 metre buffer" becomes "minimum 8 metre buffer" (MM schedule, pp. 61–63, 77, 82–83). At ES02 the condition carries both a 10 metre and an 8 metre clause.	For allocations containing a Local Wildlife Site, the Inspectors asked for site policies to "include reference to relevant buffers", to "help to protect the natural environment" (EXAM 213, Annex 1, ¶26). Action MM4.16 asked for distances to be stated as minimums (EXAM 195, p. 8). Neither asks for a shorter distance. The GS5 definitions add that "larger buffers may be recommended in Green Belt sites or LWS" (MM185, p. 202). [36]

A2. Changes following requests for clarification or justification

Change	What the Inspectors asked	What changed
FMM29, SS19, Robin Brook	After the Stage 4 hearings, MM429 added a "minimum 15m buffer either side of Robin Brook" (EXAM 195, MM4.42, p. 19). After a representation, the Inspectors asked the Council to "clarify if there are particular circumstances that justify this departure in the case of SS19" (EXAM 217C, question 7.1).	The Council replied that 15 metres "may not be necessary along its entire length" and proposed habitat-based minimums: 3 metres either side of minor watercourses, with separate buffers for ancient and veteran trees, other trees and hedgerows. The Inspectors agreed the revised condition should be published and consulted on (EXAM 217C ¶26; FMM schedule, pp. 18–19). Three metres is the GS5 general rule for minor watercourses; the same text says larger buffers may be recommended on Green Belt sites, and SS19 is one (MM185, p. 202). [37]
MM219, Policy DC1, infrastructure delivery plans	Action MM3.40: "clarify what type and scale of scheme it applies to. Clarify what Infrastructure Delivery Plans will involve and how they will operate" (EXAM 198, p. 39).	MM219 adds the liaison requirement asked for, and also replaces "Promoters of strategic housing sites will be required to work collaboratively to produce and implement a single infrastructure delivery plan" (CD02, Policy DC1) with "Where appropriate, they should produce a single joint infrastructure delivery plan". The duty to implement a single plan is removed; where several developers share a strategic site, they are "expected to coordinate the delivery of required infrastructure". Reason: "To aid implementation of site allocation policies" (MM schedule, p. 57). [38]

Change	What the Inspectors asked	What changed
MM147, Policy NC15, children's play space	Action MM3.9: "Clarify the level of provision required in residential developments of fewer than 100 homes" (EXAM 198, p. 6).	MM147 answers this, and also changes the usual on-site play trigger from "50 or more new homes" (CD02, Policy NC15) to "2 hectares or more", with play space "usually" on site (MM schedule, pp. 188–189). A scheme of 90 homes on 1.5 hectares met the old trigger and does not meet the new one; its other open space obligations remain. Reason: "To ensure the Policy is effective" (MM schedule, p. 41). [38]

A3. Questions about wildlife corridors and farmland

FMM5 with MM227, wildlife corridors. Paragraph 179(a): plans should "Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including … wildlife corridors and stepping stones that connect them". The Inspectors found the justification for "very significant weight" to connecting spaces lacking, "particularly as the Local Nature Recovery Strategy (LNRS) has not yet been finalised" (EXAM 217C ¶12), and FMM5's "Where possible" paragraph follows their suggested wording (¶14), with changes. We do not question that finding, and we accept that other ecological and green space protections in the Plan remain. But on corridors specifically, the Plan as modified: removes from Policy BG1 the bullet "green spaces forming (or with potential to form) wildlife corridors or 'steppingstones'" (FMM schedule, pp. 8–9), which MM103 had added in March (MM schedule, p. 136); on 159 allocations replaces the condition that corridors and buffers "are to be maintained on site and removed from the developable area" with "Explore opportunities to provide ecological corridors" (MM227, MM schedule, p. 60; EXAM 198, action MM3.19, p. 16); maps no wildlife corridor or stepping stone (Map 17, MM schedule, p. 139); and defers guidance on the network until "the work on the LNRS has been completed", with no date (FMM4, paragraph 5.26). Whether that meets paragraph 179(a) until the Strategy is adopted is the question for the report. [12]

FMM27 and FMM30 with MM184, best and most versatile farmland. Footnote 58 to paragraph 175: "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." MM184 makes allocation itself a route through Policy GS4 (MM schedule, p. 48), following action MM3.18, agreed on 16 October 2025 on the provisional 1:250,000 map. The new Defra predictive map was published on 15 October 2025; the Council says the dataset "was not available to download and use until later" (EXAM 217C, Council response to email queries, section 2). The Inspectors asked the Council to say whether poorer land had been selected and, if not, why (EXAM 217C ¶21), and said the NWS31 and SES10 conditions should be removed "if it is determined that the omission/deletion of agricultural land classification conditions is justified" (¶22). EXAM 219 does not discuss the conditions; it says the new map is "not necessarily for determinative use at individual parcel level" (¶1.2), and records NWS31 moving from poorer to higher quality (¶2.6) and SES10 predicted higher quality (¶2.13): predicted

scores, not measured grades. The FMM schedule's reason is "For consistency with other similar site allocations" (pp. 18–19), and the Officer Decision Report says the conditions "had been retained in error", relying on the October 2025 agreement (¶2.7). Neither records a reassessment of the survey requirement in the light of the new data, which is what ¶22 contemplates. Without the condition, the Plan no longer requires the grade of this land to be established at the application stage; and the proposed monitoring framework has no indicator that would record the loss (A1). [13]

A4. Protections to retain unless a change is justified (ask 4)

The 10 metre watercourse buffers, with one consistent figure at ES02; the farmland-loss monitoring measure, reinstated in the monitoring framework; the FMM14 commitment, as guidance; the single infrastructure delivery plan and the duty to implement it; a homes-based play trigger alongside the area-based one; and a Robin Brook buffer that reflects the GS5 text for Green Belt sites.

Records searched. Hearing action schedules EXAM 61, 115, 195 and 198. Inspectors' letters EXAM 8 (6 February 2024), 120 (6 February 2025), 213 (16 January 2026), 217 (5 June 2026), 217B (16 July 2026) and 217C (27 July 2026, with appended questions and Council responses). Also EXAM 125B, EXAM 219, the IIA Report Addendum (February 2026), the Sustainability Appraisal note (September 2026, updated 15 September) and CD02. [11]

Appendix B. The city centre and density evidence

B1. The capacity study for the Central Area

The housing land assessment describes the 2020 capacity study for the Central Area Strategy (CC02), and records that the later Priority Neighbourhood Frameworks are reflected in its estimates (EXAM 3A ¶3.46–3.49). CC02 was prepared as part of the Council's commission with Deloitte Real Estate and Planit-IE. It describes its output as "an initial quantum of residential development for the Central Area based on a density-led approach to capacity testing" (p. 5), calculated "without prescribing any specific design outcome to any of the identified sites" (p. 5). It tested only known sites: "Gap Sites and Future Potential Sites have not been assessed and the capacity for these sites will need further consideration" (p. 62). The schedules (pp. 36–56) list 36 Gap Sites and 26 Future Potential Sites with recorded areas totalling about 29.6 hectares; that is a land area, not a homes figure, and some of it has since been allocated. It contains an initial building heights framework, with a 15-storey benchmark drawn from the existing skyline (pp. 14–15). Its site-by-site heights, floor-area ratios and notes sit in a master schedule described as "a 'live file'" (p. 28), which we have not located in the published material. It says: "A cohesive tall buildings strategy for The City Centre should be produced" (p. 62). [21] We have not found the strategy in the published material.

The Council's parcel-by-parcel work (the Priority Neighbourhood Frameworks, CC03, November 2022) covers five Priority Locations and calls its heights indicative: they "are based on existing townscape and desktop analysis and will require further testing

at later stages in the process" (p. 128). The Site Availability Tables cite CC03 by name for 44 of the 165 Central allocations, 5,773 of 17,988 homes, and cite CC02 nowhere (EXAM 81O, October 2024; Alliance count). Historic England said in 2023, of the Policy CA1B catalyst site, that CC03's illustrative masterplan "lacks sufficient detail to guide proposals" and does not "carry sufficient weight in the decision-making process" (Regulation 19 representation, Appendix A, p. 5).

B2. Tall buildings and FMM22

Policy DE6 as modified permits tall buildings, defined as 15 or more storeys (MM211), in "Tall Building Areas" within the Central Area (MM208); outside them, proposals "will not be supported other than in exceptional circumstances" (MM209). The modified Central Area Policies Map (EXAM 227A, March 2026) shows no Tall Building Area in its legend. In 2023 Historic England and the Council agreed the Council's statement that "A Tall Building Area review/assessment will form part of the new City Centre Design Guide, which is currently work in progress" (EXAM 4B, p. 14, "Both parties agree"). In March 2024 the Council told the Inspectors that the 2003 Urban Design Compendium "is currently in use for determining planning applications for tall buildings" and that "Evidence base work, including the heritage significance report, analysis of existing tall buildings and drawings, has been carried out to date at officer level and has not yet been produced in the form of a public report", and that it would be published for consultation once the Plan is adopted (EXAM 11C). We found no published guide and no adopted Tall Building Areas map since. FMM22 replaces "a supplementary planning document" with "local planning guidance" (FMM schedule, p. 16); FMM20 and FMM21 use "practice guidance" elsewhere in the Plan, and neither term is explained. CC02's heights framework and the neighbourhood frameworks are indicative; the only map of locations for tall buildings in use remains the Compendium's (EXAM 64, 2003, p. 67). [22]

B3. Density outside the Central Area

Policy NC9 sets density ranges by location: at least 70 dwellings per hectare within or near the Central Area; 50 to 80 within or near District Centres; 40 to 70 within easy walking distance of tram stops and high frequency bus routes; 35 to 50 in the remaining urban area; 30 to 40 in rural areas (CD02, pp. 40–41; ranges unchanged by the Main Modifications). The housing land assessment says that for most sites without planning permission "the assumed densities are based on the bottom end of the density ranges usually required by the Sheffield Local Plan Core Strategy and therefore reflect conservative estimates of capacity" (EXAM 3A ¶3.40; other routes and exceptions at ¶3.37–3.42), and that "Adjustments may need to be made to the density assumptions in future updates if monitoring shows that actual densities being achieved on approved schemes are lower (or higher) than had previously been estimated" (¶3.43). Appendix 1 assumes 50, 40 and 35 dwellings per hectare for the three urban location types and 30 for rural areas. The Council's Authority Monitoring Report of January 2023 calls the ranges "certain minimum densities" (CD57 ¶5.27) and records that in 2021/22 "The average density on sites outside the Central Sub-Area was 51 dwellings per hectare" (¶5.26): an average across completed schemes, which shows the Council holds the data to test its assumptions, not that every site can achieve it.

We found no later monitoring report with a density series in the sources checked. The Inspectors' finding that "density estimates are reasonable and justified" (EXAM 213 ¶11) concerns the Green Belt allocation sites. [23]

B4. Documents requested (ask 5)

The master schedule to the 2020 Capacity Report (CC02, p. 28). The heritage significance report, tall building analysis and drawings described in EXAM 11C, and any draft City Centre Design Guide. For each Gap Site and Future Potential Site left unassessed by CC02: its later assessment and capacity; where it is counted in allocations, permissions or windfall; or why it was rejected. A reconciliation of the 2020 urban capacity of about 40,000 homes to 2038 with the September 2026 brownfield-only figure of 31,822, stating each exercise's land categories, periods and assumptions. Densities of housing permissions granted since 1 April 2022, by location type, against EXAM 3A Appendix 1, and the Authority Monitoring Report density series from 2021/22 onwards. The updated Core Public Transport Network zone used in EXAM 130C.

A review of the windfall allowance against the newer urban evidence, including the six sites in EXAM 130C and reasonable options suggested by communities. It should separate capacity already counted in allocations or permissions, capacity represented by the windfall forecast, and any net addition, including density gains on allocated sites. It should test delivery periods and housing types, avoid double counting, and show the effect on the housing shortfall and the amount of Green Belt needed. [39]

References

1. Sheffield City Council, *Sheffield Plan: Issues and Options*, September 2020, foreword, pp. 3–4 (Councillor Bob Johnson, Cabinet Member for Transport and Development), and "The previous consultation – what did you say?", p. 11.
2. *Issues and Options*, September 2020, spatial options A to C, pp. 46–49 and Table 1; *Interim Consultation Report*, March 2021, questions 22a–22b, printed pp. 203–205 (331 of 464 responses, 71.34%, preferred Option A).
3. EXAM 120, Inspectors' Stage 2 post hearings letter, 6 February 2025, paragraphs 25, 26, 33 and 37.
4. Votes: Strategy and Resources Policy Committee, 30 April 2025 (8–5); Full Council, 14 May 2025 (45–31, four abstentions). Full Council vote and Penny Baker: Julia Armstrong, *The Star*, "Cross-party allegations as Sheffield councillors agree controversial Green Belt housing plan", 15 May 2025. The 2025 consultation's scope: EXAM 124, paragraphs 5.1–5.3; Officer Decision Report, paragraphs 5.1–5.2.
5. *Integrated Impact Assessment: Sustainability Appraisal note to respond to Examination queries and Further Main Modifications*, September 2026 (updated 15 September 2026), paragraph 2.7.
6. *Sheffield Plan: Proposed Main Modifications – Frequently Asked Questions*, September 2026, questions 1, 6, 7, 14, 17, 21 and 22.
7. Sheffield City Council, "Development sites", Brownfield Register section, accessed 27 October 2026: the next register update is intended after the Inspectors' report. https://www.sheffield.gov.uk/planning-development/city-wide-plans-reports/housing-land-sites.
8. Planning and Compulsory Purchase Act 2004, sections 19(3) and 20(5)(a); Town and Country Planning (Local Planning) (England) Regulations 2012, regulation 18; NPPF, September 2023, paragraph 16(c).
9. *Statement of Representations Procedure*, September 2026, page 1.
10. *Schedule of Proposed Further Main Modifications*, September 2026, reason column, pp. 6–21. Stated reasons: legislation, 18 (14 supplementary planning documents; FMM1 and FMM13, Local Plan review; FMM11 and FMM12, Renters' Rights Act); land ownership, 3 (FMM6, FMM7, FMM26); road access, 2 (FMM28, FMM31); effectiveness, 3 (FMM2, FMM5, FMM16); clarification, 2 (FMM18, FMM19); consistency, 2 (FMM27, FMM30); habitats, FMM29; new evidence, FMM32; capacity changes, FMM33. FMM4, FMM9 and FMM14 at pp. 7–8, 11 and 13.
11. Hearing action schedules EXAM 61, EXAM 115, EXAM 195 and EXAM 198; Inspectors' letters EXAM 8 (6 February 2024), EXAM 120 (6 February 2025), EXAM 213 (16 January 2026), EXAM 217 (5 June 2026), EXAM 217B (16 July 2026) and EXAM 217C (27 July 2026); EXAM 217 sections 2, 4 and 5 and EXAM 217B paragraphs 4–6 and EXAM 217C paragraphs 7–9, 11–18 and 22–30 for the changes the Inspectors requested or agreed. The safeguards as they stood in May 2025: Publication Draft Sheffield Plan (CD02), Policies DC1 and NC15; the

original site conditions as struck through in the MM schedule; EXAM 124 (survey conditions); EXAM 125B, Table 12.1 (monitoring).

12. NPPF, September 2023, paragraph 179(a); EXAM 217C, paragraphs 12 and 14; *Schedule of Proposed Further Main Modifications*, FMM4 (paragraph 5.26) and FMM5 (pages 8–9); *Schedule of Proposed Main Modifications*, March 2026, MM103 (page 136), MM227 (page 60) and Map 17 (page 139); EXAM 198, action MM3.19, page 16.
13. NPPF, September 2023, paragraph 175 and footnote 58; EXAM 217C, paragraphs 19, 21 and 22, and the Council's response to email queries, section 2; EXAM 219, paragraphs 1.1–1.3, 2.6, 2.13 and 3.3; EXAM 198, action MM3.18 (16 October 2025); *Schedule of Proposed Main Modifications*, March 2026, MM184 (page 48); Officer Decision Report, paragraph 2.7; *Schedule of Proposed Further Main Modifications*, FMM27 and FMM30.
14. EXAM 217B, 16 July 2026, paragraphs 1–6; *Schedule of Proposed Further Main Modifications*, FMM1 and FMM13 (logistics and Gypsy and Traveller provision); 2012 Local Planning Regulations, regulation 10A; NPPF, September 2023, paragraph 33 (ordinary review duty).
15. NPPF, September 2023, paragraph 141; EXAM 217, 5 June 2026, paragraph 3.3; EXAM 217C, paragraphs 5 and 6.
16. EXAM 120, 6 February 2025, paragraphs 34, 35, 36 and 53; EXAM 130, *Selection of Sites for Green Belt Release Topic Paper*, May 2025 (the site options work).
17. EXAM 129A, Assessment of Employment Land, April 2025, paragraphs 1.1–1.4; EXAM 129B, area appraisals; EXAM 213, Annex 1, paragraph 31.
18. EXAM 124, *Proposed Additional Site Allocations*, May 2025, paragraphs 2.10, 2.14, 2.21, 4.2 and 4.3 (fourteen sites: ten housing, three employment, one mixed).
19. EXAM 213, 16 January 2026, page 2 and Annex 1, paragraphs 8–13: consultation legally compliant to date (paragraph 9); exceptional circumstances (10 and 12); site selection and densities (11); full reasoning reserved for the final report.
20. EXAM 130C, *Promoted Urban Sites – Topic Paper – Addendum*, September 2026, page 2; Sustainability Appraisal note, section 3 and paragraph 2.7; Officer Decision Report, paragraph 2.18.
21. CC02, *Sheffield Central Area Strategy – Capacity Report*, July 2020, pages 5, 14–15, 28 and 62, and the site schedules at pages 36–56; EXAM 3A, *Housing and Economic Land Availability Assessment*, December 2023, paragraphs 3.46–3.49; CC03, *City Centre Priority Neighbourhood Frameworks*, November 2022, page 128; EXAM 81O, *Site Availability Tables – Central Area*, 15 October 2024; Historic England, Regulation 19 representation, February 2023, Appendix A, page 5. The 29.6 hectare figure (10.37 ha of Gap Sites and 19.18 ha of Future Potential Sites, 61 recorded areas) and the EXAM 81O counts are the Alliance's.
22. EXAM 11C, *SCC Tall Buildings Evidence Base Note*, 14 March 2024; *Schedule of Proposed Main Modifications*, March 2026, MM205, MM208, MM209 and MM211 (pages 54–55); EXAM 227A, Policies Map – Central Area, March 2026, legend; *Schedule of Proposed Further Main Modifications*, FMM20, FMM21 and FMM22

(page 16); EXAM 64, *Sheffield Urban Design Compendium*, 2003, pages 66–68; EXAM 4B, Statement of Common Ground with Historic England, page 14.

23. EXAM 3A, paragraphs 3.37–3.43 and Appendix 1 (printed pp. 49–50); Publication Draft Sheffield Plan Part 2 (CD02), Policy NC9, pages 40–41; CD57, *Authority Monitoring Report*, January 2023, paragraphs 5.25–5.27; EXAM 213, paragraph 11.
24. *Issues and Options*, September 2020, Option A (pp. 46–49, Table 1); Sustainability Appraisal note, September 2026, table following paragraph 5.21 (Option 1, 31,822; Option 2, 34,203; Option 3, 34,473); IIA Report (Update and Addendum), Table 8.1, printed p. 69.
25. EXAM 120, paragraph 26; EXAM 124, paragraphs 2.10, 4.4 and 4.5; *Schedule of Proposed Main Modifications*, March 2026, allocation tables for CH05 (549 homes by 2039), NES37 (592), NES38 (188), NES39 (66), NWS30 (69), NWS31 (103), SES29 (735), SES30 (827), SS19 (304), SWS18 (258) and SWS19 (80) (pages 216–244; 3,771 by 2039, 3,906 in all), MM90 Table 1 and MM92 Table 3.
26. EXAM 130, 130A, 130B and 130C; EXAM 219; EXAM 125B (April 2025); *IIA Report (Update and Addendum)* and *IIA Report Addendum*, February 2026; Sustainability Appraisal note, September 2026, section 5; EXAM 135, pages 12, 29 and 30.
27. NPPF, December 2024, paragraph 148 and glossary; NPPF, August 2026, policy GB4(1)(d)(i) and Annex A, paragraphs 7–8. The later release sequence is subject to a sustainable pattern of development overall. This examination remains under the September 2023 Framework: EXAM 219, paragraph 3.1; EXAM 120, paragraph 35. Predicted farmland quality: EXAM 219, paragraph 2.6, and September Sustainability Appraisal note, paragraphs 5.22–5.27.
28. NPPF, September 2023, paragraphs 35(b) and 140–141; EXAM 120, paragraphs 12 and 34; EXAM 213, Annex 1, paragraphs 8–13; EXAM 217C, paragraphs 5–6.
29. EXAM 128A, IDP Part 2 Infrastructure Schedule Addendum, October 2025, paragraphs 3.2.6–3.2.7, printed p. 16: three pupils per year group per 100 houses of two or more bedrooms. Thus 1,697 × 3 ÷ 100 = 50.9. This illustration is conditional on housing mix, not a pupil forecast.
30. Publication Draft Sheffield Plan Part 2 (CD02), Policy NC11, pp. 43–44; NPPF, September 2023, paragraph 35(c); *March Main Modifications*, MM410–411, pp. 230–233 (Handsworth allocation conditions and safeguarded land); EXAM 43, *IDP Addendum*, section 4.5.1; EXAM 128A, paragraphs 1.1.2–1.1.4, 3.2.10 and 4.4.1, and scheme ED11; EXAM 213, Annex 1, paragraph 18; EXAM 217C, appended Council response, item 10.1, PDF p. 28 (citywide primary surplus, possible GP reconfiguration, meeting rooms "if a need is identified").
31. Full Council, 14 May 2025, minutes, p. 10, item 5.2.4 (Leader's statement on revisiting urban capacity and densities, and considering sites elsewhere at review); NPPF, September 2023, paragraph 33; EXAM 217B and FMM1/FMM13 (reference 14).
32. NPPF, September 2023, paragraphs 16(c), 20(c), 34, 35(b)–(d), 73 (including footnote 37), 140–141, 175 (footnote 58) and 179(a).

33. Rotherham Core Strategy (2014), CS1 (around 1,700 homes within the plan period), pp. 43–44; Kirklees Local Plan Allocations and Designations (2019), HS11 (1,460 homes within the plan period), pp. 28–30; Calderdale Local Plan (2023), Appendix 1, LP1451 (1,257 homes), pp. 93–95; Cheshire East Local Plan Strategy (2017), LPS 33, criteria 1, 3 and 4 (around 1,500 homes). The latter three specify two-form-entry primary schools.
34. Email from the Leader of the Council, "Recent questions raised regarding green belt sites", 22 September 2026, with planning team answers, including the "Process" section: the Brownfield Register and examination supply evidence draw on the same SHELAA database; further technical questions are directed to the consultation.
35. EXAM 125B, *Integrated Impact Assessment Update and Addendum*, April 2025, Table 12.1, pages 168–169; *IIA Report Addendum*, February 2026, Table 7.1, pages 39–40, and paragraph 7.1.2; Sustainability Appraisal note, September 2026, paragraphs 2.9 and 5.5–5.6.
36. *Schedule of Proposed Main Modifications*, March 2026, MM229, MM232, MM243, MM253, MM256, MM357, MM394, MM396 and MM399 (pages 61–63, 77 and 82–83); EXAM 213, Annex 1, paragraph 26; EXAM 195, action MM4.16, page 8; MM185, page 202.
37. EXAM 195, action MM4.42, page 19; EXAM 217C, question 7.1 and paragraph 26; *Schedule of Proposed Further Main Modifications*, FMM29, pages 18–19; MM185, page 202.
38. EXAM 198, actions MM3.40 (page 39) and MM3.9 (page 6); *Schedule of Proposed Main Modifications*, March 2026, MM219 (page 57) and MM147 (pages 41 and 188–189); Publication Draft Sheffield Plan Part 2 (CD02), Policies DC1 and NC15.
39. EXAM 217A, Council response to the Inspectors' Post Main Modifications Note, 2 July 2026, pp. 3–4, section 3; EXAM 130C, September 2026, p. 2; EXAM 217C, paragraphs 5–6; EXAM 120, paragraph 27; EXAM 3A, paragraphs 3.50–3.64; NPPF, September 2023, paragraphs 71 and 141 and glossary definition of windfall sites; Planning Practice Guidance, Housing and economic land availability assessment, paragraphs 008, 010 and 023–025 (22 July 2019).
40. IIA Report (Update and Addendum), Version 2, February 2026, Appendix G, Strategic Location 1, printed p. 241 (transport benefits); March Main Modifications, MM410–411, pp. 230–233 (station wording at p. 231). Network Rail, response of 15 October 2026, FOI2026/01605, p. 3, item 3 (no agreed construction programme or formal construction milestones identified).
41. IIA Report (Update and Addendum), Version 2, February 2026, paragraphs 7.1.10–7.1.11, printed pp. 32–33; EXAM 125B, April 2025, paragraph 7.1.11, pp. 31–32; CD17, December 2022, paragraph 7.1.10, p. 20. CIL and Planning Obligations SPD, December 2015, Guideline GE1 and definitions, pp. 29–30, and GCF2 and definitions, p. 35. These passages underpin the 1,000-home threshold, school provision and community facilities argument.
42. March Main Modifications, allocation conditions for the additional housing sites, especially MM410–411, pp. 230–233: Golden Rules expressly applied to

housing; SES29's employment land is excluded. NPPF, August 2026, policy GB8(1)(b): necessary infrastructure improvements. The delivery argument also rests on September 2023 NPPF paragraphs 34, 35(c) and 73.

43. Sheffield City Council, Public Petitions, Questions and Statements for the Council Meeting on 23 September 2026, p. 33 (Ruth Hubbard's statement).