

Alison Norris' greenbelt objection:

I am submitting my response to the main modifications consultation as ward councillor for Woodhouse and Handsworth. I support my fellow ward Councillor Mick Rooney's submission, but have the following serious concerns to add:

MM184

This modification creates a circular process where development on the best and most versatile agricultural land is only permitted where the site is allocated for development. This is proposed on the basis that "agricultural land value has been taken into account when deciding to allocate the site".

However no accurate assessment of the agricultural value of the land released from green belt was made when deciding to allocate the sites.

Planning policy should protect high quality agricultural land from loss to development. The new predictive Agricultural Land Classification map makes the most accurate data publicly accessible. This clearly shows that some of the sites allocated for development contain grade 2 and 3a agricultural land.

MM184 permits unjustified release of sites by allowing sites to be released based on inaccurate assessments of agricultural land value. I consider this to be unsound as it is not consistent with the requirement of planning policy to protect high quality agricultural land.

The council's own Integrated Impact Assessment Report Addendum: Modifications Consultation concludes that the modified plan ranks worse than the originally submitted plan in relation to:

Soil and Land

Landscape and Townscape

Biodiversity and Geodiversity

Natural Resources and Pollution

Transport and Accessibility

These problems are particularly evident in relation to sites SES30 and SES29, MM411 and MM410

MM411 - SES30

This modification is not justified because:

The distribution of affordable housing is heavily skewed, which means this aspect of the plan is not positively prepared. SES30, for example, is expected to deliver 434 affordable homes, which is more affordable housing than the entire South West is set to gain from its Green Belt allocations. This is in direct contradiction to Council Policy NC3, which states that the South West has a far greater requirement for affordable housing than the South East, where

SES30 is located. The Council cannot claim that this site allocation strategy matches its own policy, as it will widen the gap still further between the parts of the city that can afford to buy and the parts that cannot.

There is no evidence that the required 10% bio net gain is achievable. The council's own ecological assessment suggests the site could be registered on the national register as a BNG habitat site – how can its biodiversity possibly be improved by development?

Viability of the site is doubtful given the watercourse, ancient hedgerows and trees that are required to be protected and the need for SUDs.

The allocation of land for a school and burial site is purely a planning place marker that can be removed at the first review. This weakens the case that there are exceptional circumstances to release this site from the green belt.

Agricultural land on this site is mostly grade 2 with the remainder 3a, with some 3b to the Southern edge. In contrast, the Ryecroft Farm site, which was not considered for release even though it could provide an equivalent number of homes in an area very short of affordable housing, is grade 4 land.

MM410 - SES29

This modification is not justified because:

This allocation adds to the problem of affordable housing being in the wrong place, as stated in my statement of opposition to modification MM411.

The viability is questionable, given factors such as the areas of contamination, the old mine workings, the need for ecological buffers for adjacent wildlife sites, and the watercourse.

There is no up-to-date and accurate ecological assessment, so how can the required 10% BNG be assured?

The site is nearly all grade 3 agricultural land.

For both MM410 and MM411 the IIA states:

“The sites at Handsworth (SES29, SES30) are characterised by fairly sensitive landscapes where development would reduce openness and alter landscape function, with complete mitigation difficult to achieve. The accompanying site policies require consideration of landscape character and environmental improvements, which will help to mitigate effects somewhat, but residual negative effects are likely to remain.”

Also, the IIA states “the cumulative scale and distribution of growth across Green Belt sites in and around north-east Sheffield, Grenoside and Handsworth is likely to increase private vehicle and HGV movements in these areas, placing additional pressures on an already congested local highway network”. However, it also states that adding more development by releasing SES30 and SES29 only “may” enable better strategic interventions to improve transport. The negative impact is likely, the mitigation only a possibility.

The IIA is also the only official document I have seen that even begins to acknowledge the social, health, and wellbeing impact of releasing these sites:

“Surrounding communities do value the Green Belt land that is now proposed for allocation, and these sites have formal and informal footpath access. The loss of this green and open space does therefore have some negative effects in terms of mental health and wellbeing.”

For these reasons I think both MM411 and MM410 are unsound. I request that site SES29 and site SES30 are removed from the plan and remain green belt.

Yours faithfully,

Alison Norris

Councillor for Woodhouse and Handsworth