

Danny Allsebrook's greenbelt objection:

To the Planning Inspector,

Re: Main Modifications MM410 (SES29) and MM411 (SES30)

I write to formally object to the proposed Main Modifications MM410 (SES29) and MM411 (SES30) relating to the release of Green Belt land within the Local Plan.

The inclusion of Green Belt sites is, in my view, unsound. The Integrated Impact Assessment (IIA) acknowledges that development on Green Belt land results in the permanent loss of greenfield sites. This loss will have adverse impacts on biodiversity, place additional strain on public transport infrastructure, and increase reliance on private vehicles, thereby contributing to environmental degradation.

The proposed "Green Belt Golden Rules" lack clarity and precision. As currently presented, they are insufficiently defined and do not demonstrate how the required standards will be achieved within MM410 and MM411. Although site-specific policies require compensatory improvements and sustainable infrastructure, these matters are deferred to the planning application stage. This approach is inadequate. Infrastructure provision should be secured in advance of development to ensure that existing communities are not adversely affected. At present, local infrastructure is already operating at or near capacity, particularly in areas where recent housing developments have been delivered. Without prior investment, further development risks placing unsustainable pressure on these services.

There is evidence to suggest that the proposed developments will exacerbate existing pressures on local schools, many of which are already oversubscribed. While expansion is identified as a potential mitigation measure, there is no clear or detailed strategy for its delivery. Significant concerns remain regarding the availability of teaching staff, the capacity to accommodate increased demand for Special Educational Needs (SEN) provision, and the physical constraints on expanding existing school sites. Furthermore, increased demand for school transport, particularly for pupils with SEN, will place additional strain on an already overstretched system.

Transport considerations have not been adequately addressed. In particular, the absence of a tram-train connection to Waverley undermines assumptions regarding sustainable transport provision and is likely to result in increased car dependency.

The Habitat Regulations Assessment (HRA) is also deficient. While it acknowledges the potential for increased pressure on protected habitats, it relies on mitigation measures that are not yet defined and are deferred to a later stage. This introduces a high degree of uncertainty. Where mitigation is necessary to render development acceptable, it should be clearly identified and secured at the plan-making stage.

Ecological evidence is incomplete. Only one ecology survey has been undertaken for SES30, and no equivalent assessment has been carried out for SES29. Both sites contribute to an important ecological network in the South East, and their development would result in habitat loss and fragmentation. The loss of ecological corridors would restrict wildlife

movement, increasing the risk of injury and long-term population decline. Such impacts are unlikely to be fully mitigated.

There are also significant concerns regarding ground stability. No comprehensive mining risk assessment has been provided, despite available data indicating a high level of risk in the MM410 area. Development without a full understanding of mine shaft locations presents a serious risk of subsidence and sinkholes. In addition, both sites are subject to potential flooding from underground springs. Although Sustainable Drainage Systems (SuDS) are referenced, their implementation may reduce the developable area, thereby undermining housing delivery targets and weakening the justification for Green Belt release.

The loss of prime agricultural land is a further concern. Recent surveys indicate that land within the S13 area is of high agricultural quality. In the context of increasing pressures on food security, the protection of such land should be prioritised. Alternative sites, including land in Dore owned by Sheffield City Council, appear to present fewer constraints and offer greater potential for infrastructure provision.

In summary, the proposed modifications rely excessively on matters being deferred to the planning application stage, creating unacceptable uncertainty and risk. The cumulative impacts on biodiversity, infrastructure capacity, public safety, and environmental sustainability are significant.

I therefore respectfully request that these sites be removed from the Local Plan. Priority should instead be given to the effective use of brownfield land. Where appropriate, higher-density development should be encouraged in sustainable locations.

Yours faithfully,  
Danny Allsebrook