

Representation on the Sheffield Plan Main Modifications Consultation



5 May 2026

Documents referenced

Schedule of Proposed Main Modifications (March 2026)

Integrated Impact Assessment (Update and Addendum, Feb 2026)

Integrated Impact Assessment Report Addendum: Modifications Consultation (2026)

Dear Inspectors,

1. Who we are and why we write

We are residents of S13 - the community that will live, every day, with the consequences of the additional Green Belt allocations now out for consultation. Many of us attended the Stage 4 hearings. Many thousands more across S13 have followed this examination through our MP, our local councillors, and our community organisations.

Our purpose is narrow: to show where the consultation documents now say one thing about MM410 (SES29) and MM411 (SES30), while the wider evidence before the examination says something else.

2. The concern, in short

The IIA carries over the assessment of SES29 and SES30 from earlier IIA work, without revisiting it against the further evidence that emerged during and after the Stage 4 hearings. The conditions on development in MM410 and MM411 push most major concerns to the planning application stage - flood risk mitigation, access feasibility, mining remediation, archaeology, and contamination. That is not how soundness is demonstrated.

The SEA Regulations require the IIA to identify, describe and evaluate the likely significant effects of the Plan and its reasonable alternatives. The NPPF requires the Plan to be positively prepared, justified, effective and consistent with national policy. We do not think the consultation documents yet meet those tests for S13.

The IIA itself acknowledges as much. Paragraph 5.2.2 of the IIA Modifications Report Addendum confirms that "what matters are the cumulative effects of the Plan, and so conclusions are drawn on the significance of effects 'as a whole'." Annex A of the same document concedes that "**additional**

site allocations are likely to have cumulative effects on the IIA findings that need to be explored further." That further exploration has not been published. The Council has set the test and identified the work needed to meet it. They have not done that work.

3. Strategic-level concerns

3.1 The concentration of growth in S13

South East Sheffield was already set to take 3,064 homes under the existing Plan. MM410 and MM411 add a further 1,697 on top of that - a 55% increase in housing in this single sub-area. Around 2,000 further homes are also coming forward at Waverley, across the road from SES29. For our community, that means approximately 3,500 new homes in a small area around Handsworth over the plan period.

How is this sustainable for our community? How has the IIA accounted for this level of growth? The IIA does not answer either question.

3.2 Cumulative impact

Section 3.2 is where the IIA's outstanding cumulative-effects work would be tested, if it were ever done. The IIA Addendum at paragraph 5.6.2 itself acknowledges that growth across the Green Belt sites in Handsworth "is likely to increase private vehicle and HGV movements... placing additional pressures on an already congested local highway network." That is the beginning of an assessment. It is not the conclusion of one. There is no single appraisal that puts SES29, SES30, the existing SES19-SES28 commitments, and the 3,890-home Waverley settlement just over the city boundary in Rotherham, onto one page and asks what their combined effect on S13 will be. Waverley shares our roads, our junctions, our schools, GP surgeries and dental practices, and the demands they place on local infrastructure. Administrative boundaries do not insulate residents from cumulative impact. The cross-boundary effect from Waverley alone deserves proper assessment. It has not had it.

3.3 Site selection and reasonable alternatives

Section 9 of the IIA Update and Addendum (February 2026) sets out the site selection process for the additional Green Belt allocations. The IIA Addendum at paragraph 4.2.10 groups SES29 and SES30 together as a single "Strategic Location 1 (Handsworth)". Paragraph 4.2.12 explains that other strategic locations were rejected because, on a mixed approach, sufficient available land was selected on more sustainable sites overall.

We disagree, and the Council's evidence points the same way. EXAM130A discounted GBOM01 partly on the basis that the Handsworth strategic location offered a stronger opportunity for "sustainable strategic growth" - but the SES29 and SES30 deliverability and constraint evidence (below) tells a different story. One Council-owned site (Ryecroft Farm) was rejected as "unavailable", while the Council's similar farmland at SES30 is to be made available by terminating an agricultural tenancy held since the early 1980s. No further Call for Sites was undertaken.¹ The SEA Regulations (12(2)) require this comparison to be set out openly. We do not think it yet is.

¹ The last Call for Sites was undertaken in the Christmas period of 2019-2020. A lot has changed since then.

3.4 Housing supply headroom

The IIA Update and Addendum (February 2026) records a supply of approximately 38,318 dwellings against a requirement of 38,012. That is a headroom of less than 1%. It has not been tested against the constraints and delivery questions set out below for SES29 and SES30. If those constraints reduce capacity, or if delivery on these sites is slower than assumed, the supply position falls below the requirement. The IIA does not show what happens in that scenario.

3.5 Housing delivery at SES30

The Council's stepped trajectory assumes a delivery rate of 150 homes a year for SES30. The IIA does not test this against evidence from comparable sites:

- the nearby Waverley development - around 4,000 homes when complete, across multiple housebuilders - delivers approximately 150 homes a year;
- Lichfield's "Start to Finish" research records a median delivery rate of 68 homes a year for sites of 500-999 homes;
- a comparable allocation CH05 was agreed at 60 homes a year;
- the landowner representation (Rep. 1.2042) originally anticipated approximately 100 homes a year for SES30.

Why should a single-developer site at SES30 deliver the same number of homes each year as the whole multi-developer Waverley scheme - an unconstrained, level, brownfield site? The IIA does not say. Nor does it say what would follow for plan effectiveness if SES30 delivers more slowly than assumed.

4. Site-specific concerns

4.1 MM410 - SES29, Handsworth Hall Farm

MM410 (SES29) describes a mixed-use allocation: 870 homes alongside 20 hectares of employment land. This is not a simple housing allocation. It is a large Green Belt release with several known constraints, a large employment component, and a significant relationship with the Sheffield Parkway. The Plan should not treat the stated housing and employment capacity as reliable until those matters have been tested.

Known constraints and developable area. The site-specific requirements for SES29 defer several important matters to the planning application stage. These include a Coal Mining Risk Assessment, a contaminated land assessment, an assessment of the impact of a historic landfill within 250 metres of the site, and provision of a Local Wildlife Site buffer. Each of these is an important constraint. They should have shaped the allocation and its assumed capacity, not been left to be resolved later.

The IIA's Flood Risk Sequential and Exception Test reports 3% of the site with a "high" surface water risk. It also identifies surface water flow routes and an unnamed watercourse running across the site.²

EXAM188, from the Mining Remediation Authority, records three mine entrances and Development High Risk Areas across significant parts of SES29.

Neither the allocation nor the IIA accounts for these constraints. Once the Local Wildlife Site buffer, watercourse, surface water routes, coal mining high-risk areas and historic landfill stand-off are allowed for, the developable area is significantly smaller than MM410 implies.

We ask the Inspectors to require the Council to explain what the realistic developable area of SES29 is, after all known constraints have been deducted.

Mixed-use layout and internal traffic conflict. The proposed 20 hectares of Class B2/B8 employment land is unusual: SES29 is the only additional Green Belt allocation in the Plan that combines a large housing allocation with a large industrial and warehousing component.

SES29 sits alongside the Sheffield Parkway, one of the most heavily trafficked roads in the city, notorious for some of the worst pollution in Sheffield. That creates a constraint for residential development. Housing should not be assumed to be appropriate at the Parkway end of the site because of traffic noise, air quality and residential amenity impacts.

The logical location for industrial or employment uses is therefore the Parkway side of the site, with housing further away from that road.

However, access to the site is from the opposite end, where the housing would need to be located. This creates a real internal conflict. If the employment or industrial units are placed at the Parkway end, but access is taken through the residential end, then traffic serving the employment uses - including commercial vehicles - would have to pass through or close to the housing area. This raises several concerns:

- conflict between residential amenity and employment traffic;
- noise, disturbance and air quality impacts for new residents;
- safety concerns from mixing residential streets with commercial vehicle movements;
- a risk that the site layout is driven by mitigation of Parkway impacts rather than by the need to create a good place to live;
- uncertainty over whether the site can deliver both housing and employment uses without conflict.

This matters because the IIA framework includes transport and accessibility, health, pollution, open space, land use and quality of the built environment as relevant sustainability considerations. SES29

² The IIA Sequential Test lists the site capacity at 770, not the 870 dwellings expected.

therefore requires more than a general statement that mixed-use development is acceptable in principle. It requires a clear explanation of how the internal layout will avoid routing employment traffic through the residential part of the site.

Ecology and Biodiversity Net Gain. The Biodiversity Net Gain assessment for SES29, EXAM157, was prepared in December 2023. By the time the Main Modifications are being considered, that ecological baseline is out of date and should not be relied on without review.

We are concerned that any desktop assessment based on older records will not capture more recent ecological data, including records added to the National Biodiversity Network database and records notified to the Council's Ecology Service.

The existing BNG assessment recognises Handsworth Beck and the stand of trees in the centre of the northern field, and notes the former extent of ancient woodland on or near the site. Further work is needed to assess:

- the ecological value of the hedgerows;
- the role of Handsworth Beck as a habitat corridor;
- the stand of trees in the northern field;
- the ecological influence of neighbouring land parcels outside the red line boundary;
- habitat connectivity across and beyond the site;
- whether more recent species records alter the baseline position;
- whether surveys undertaken in November missed species or habitat indicators visible earlier in the year.

If the ecological baseline is out of date, the assessment of site capacity, layout, mitigation and Biodiversity Net Gain is also uncertain.

The site's housing and employment capacity should not be treated as fixed until an updated ecological assessment has been carried out in the appropriate survey season.

Requested change. The Inspectors are asked to require the Council to demonstrate that SES29 can be planned so that:

1. the stated housing and employment capacity is realistic after all known constraints have been deducted;
2. housing is not exposed to unacceptable traffic noise, air quality or amenity impacts from the Parkway;
3. employment traffic can access the employment land without undermining residential amenity or safety;
4. the ecological baseline is updated before the allocation is finalised;
5. the updated ecological work considers hedgerows, Handsworth Beck, habitat connectivity, neighbouring land parcels and recent species records; and

6. the site capacity, layout, mix of uses and allocation boundary are reconsidered if the updated evidence shows that stronger buffers, lower capacity or different access arrangements are required.

If these matters cannot be demonstrated, the capacity, mix of uses, access arrangements or allocation boundary for SES29 should be reconsidered.

4.2 MM411 - SES30, Land between Bramley Lane and Beaver Hill Road

MM411 (SES30) describes an allocation with a total housing capacity of 827 homes alongside up to 5 hectares for a secondary school and up to 4 hectares for a multi-faith burial ground. The conditions on development direct that flood risk mitigation, mining remediation, and archaeology will all be addressed at or before planning application stage. In our view, this leaves soundness to be dealt with later, rather than demonstrating it now.

Site access and local road network. The IIA records active travel and public transport scores at a high level. It does not show how an 827-home site is to be entered and exited safely. There is one practical way in, off the steep Beaver Hill Road, and it crosses the no-development buffer recommended by the Level 2 SFRA. The Strategic Road Network assessment shows the Retford Road / Beaver Hill Road junction running at virtual maximum capacity (98%) by 2039, even with mitigation. None of this is addressed in the IIA's appraisal of SES30.

Flood risk. The IIA's site-level appraisal scored flood risk at SES30 as "minor positive", noting "no significant flood risk constraints". Those scores were prepared before the Level 2 SFRA. The IIA Update and Addendum (February 2026) acknowledges at paragraph 2.3.7 that the Level 2 SFRA has been "taken into account at strategy level" - but the SES30 site score itself has not been updated. The Level 2 SFRA, when it came, identified Flood Zones 2 and 3 on parts of the site; an "unknown" fluvial risk from an unmodelled on-site tributary; a recommended approximately 9.9% of the site (around 3.6 hectares) for flood storage; and an 8-metre no-development buffer either side of the watercourse. Climate change impacts remain unmodelled. No Sequential Test was undertaken for SES30 reflecting these findings.

Cumulative on-site constraints. Once you subtract the isolated northern parcel (around 5 hectares), the flood storage requirement (around 3.6 hectares), the 8-metre watercourse buffer, the 15-metre buffer to ancient woodland, the area of "major archaeological constraint" of approximately 3 hectares (EXAM127A), the Mining Remediation Authority's Development High Risk Areas (EXAM188), and the safeguarded land for the school (5 hectares) and burial ground (4 hectares), the developable area is significantly smaller than MM411 implies. We have done that arithmetic. The IIA has not.

Late evidence not reflected in the appraisal. Several reports relevant to SES30's soundness were produced after the decision to allocate. EXAM153 (the Ecological Appraisal) was issued in September 2025 and not published until October. EXAM175 (the Baseline Biodiversity Net Gain Assessment) suggests that registering SES30 as a biodiversity net gain site "may be a consideration instead of development". The Archaeological Scoping Assessment recommended evaluation before allocation.

The IIA Update and Addendum (February 2026) does not revisit the SES30 site score against any of these reports.

4.3 Site-specific exceptional circumstances

Both MM410 and MM411 record that the sites were “formerly designated as Green Belt” and that the National Planning Policy Framework “Golden Rules” apply. A site-specific assessment of harm to the Green Belt and the mitigation of that harm should have been carried out before exceptional circumstances can be established. The IIA records the rationale at strategic level only, and the Green Belt Release Topic Paper (EXAM 130) does not contain site-by-site assessments for SES29 and SES30, only inaccurate “suitability assessments” and superficial “planning appraisals”. More detailed reports to show exceptional circumstances for both sites should, in our view, be provided.

5. What we ask

Our main request is straightforward: MM410 (SES29) and MM411 (SES30) should be deleted. The matters set out in sections 3 and 4 do not, in our view, describe an IIA that needs minor updating. They describe allocations whose developable area, delivery rate, cumulative impact and exceptional-circumstances case have not been demonstrated on the evidence now before the examination. They are not sound under the NPPF tests, and the gaps cannot be closed by further desk work alone. The community of S13 does not support these allocations, and we ask the Inspectors to recommend their removal from the Plan.

If the Inspectors decide not to recommend deletion, then at minimum - and while maintaining our objection - the consultation documents and any further IIA work carried out before the Plan is finalised should address the matters above. Specifically:

- that the IIA’s appraisal of SES29 and SES30 is updated to take account of the Level 2 SFRAs, EXAM127A (archaeology), EXAM153 (ecology), EXAM157 and EXAM175 (biodiversity net gain), and EXAM188 (Mining Remediation Authority);
- that the developable area and housing capacity of each site is recalculated once the on-site constraints are subtracted - including, for SES29, the surface water routes, watercourse, Local Wildlife Site buffer, coal mining high-risk areas and historic landfill stand-off, and for SES30 the buffers to local wildlife sites and veteran trees, no-development areas, coal mining high-risk areas and areas of archaeological interest;
- that the assumed delivery rate of 150 homes a year for SES30 is justified against the evidence from comparable sites, or revised;
- that the Council provides a sensitivity analysis showing the effect on the supply position if capacity or delivery on the S13 sites comes in below assumption;
- that the Council provides a single cumulative impact assessment for S13, covering SES29, SES30, the existing SES19-SES28 commitments, the cross-boundary growth at Waverley and the 20 hectares of Class B2/B8 employment proposed at SES29;

- that site-specific exceptional circumstances assessments are provided for both SES29 and SES30; and
- that the Council explains clearly why alternative sites in Strategic Locations 3, 6 and 7 were considered less sustainable than the Handsworth strategic location, against the IIA framework.

We do not offer these steps as a substitute for our main request. Even if every one of them were undertaken, the cumulative impact of 1,697 additional homes in an area already absorbing more than 5,000 dwellings, on a constrained road network, against a sub-1% supply headroom, would remain unaddressed. The matters that drive the community's opposition - the loss of Green Belt for Handsworth and Woodhouse, the concentration of growth in S13, and the deferral of major constraints to the planning application stage - cannot be fixed by further IIA work.

We ask the Inspectors to recommend that MM410 and MM411 are deleted, and to require the Council to find the homes the Plan needs without releasing this part of the S13 Green Belt and without the cumulative burden these allocations place on our community. We are the S13 residents who will live with the effects of this Plan for its lifetime and beyond.

Yours faithfully,

Save S13 Green Belt: The Sapphire McCarthy Campaign