

MAIN MODIFICATIONS CONSULTATION RESPONSE

Brownfield Land Availability, Housing Supply and Evidence Base

Introduction

This submission responds to the Main Modifications relating to housing supply, distribution, trajectory and brownfield land, specifically:

- Annex A – Site Allocations (MM461A)
- MM90 – Housing Supply Table
- MM91 – Distribution Table
- MM92 – Housing Trajectory
- MM93 – Five-Year Supply
- MM11 – Policy SP2
- MM87 – Brownfield Target
- MM81 – Windfall / Opportunity Sites

This response is supported by independently compiled evidence of brownfield land availability, together with a Freedom of Information response from Sheffield City Council regarding housing stock, demolition and delivery.

It also highlights a further critical omission in the Plan’s preparation, namely the absence of a comprehensive Call for Sites exercise since 2019. This failure significantly undermines the completeness and reliability of the Council’s land availability evidence.

Taken together, these issues demonstrate that the Plan’s housing strategy is based on an incomplete and outdated understanding of available land, and that the Main Modifications do not resolve these deficiencies.

This submission is further informed by evidence presented during the Local Plan Examination hearings. At the Stage 4 hearing on 21 November, a representative of Sheffield City Council confirmed that:

“We don’t have the resources to look at every plot in Sheffield.”

This statement is significant, as it confirms that the Council’s assessment of land availability was constrained by capacity rather than a comprehensive review of all potential sites.

Failure of Evidence Base: Brownfield Register and Call for Sites (MM87, MM11, MM90)

The Plan's approach to housing supply relies on the assumption that available brownfield land has been appropriately identified and assessed. However, this assumption is not supported by the evidence.

Independent analysis has identified approximately 346.1 hectares of previously developed land across Sheffield with potential for housing or employment use (see Table 1). This includes:

- former council housing sites with existing infrastructure
- vacant and cleared urban land
- sites previously promoted through consultation but omitted from the Council's Brownfield Register
- additional sites currently marketed for development

Many of these sites are not included within the Council's Brownfield Land Register.

In addition to this omission, the Council has not undertaken a comprehensive Call for Sites exercise since 2019. This represents a significant gap in the evidence base. A Call for Sites is a fundamental component of plan preparation, ensuring that landowners, developers and communities have the opportunity to promote available land. Without an up-to-date exercise, the Council cannot demonstrate that all reasonable sites have been identified.

The combined failure to maintain an up-to-date Brownfield Land Register and to carry out a recent Call for Sites means that the Plan is based on incomplete and potentially outdated land availability data. This directly undermines the robustness of the housing supply evidence and the justification for site allocations.

The significance of this is reinforced by the Council's FOI response, which confirms that 9,513 council homes have been demolished between 1996 and 2025, including 4,476 flats/maisonettes and 5,037 houses. In contrast, only 502 new council homes have been delivered since 1980.

This disparity demonstrates that a substantial number of previously developed housing sites exist, many of which have not been redeveloped. These sites represent a clear and deliverable source of housing land that has not been fully accounted for.

In this context, the brownfield target adjustments proposed under MM87 and the spatial strategy under Policy SP2 (MM11) are not supported by a complete or proportionate evidence base.

The hearing evidence also indicates that, in light of these constraints, many potential brownfield sites were treated at a high level as "windfall" based on assumptions about size and delivery stage, rather than being assessed individually. Sites not promoted through the formal 2019 Call for Sites were not fully considered, not because they were unsuitable, but because they fell outside the scope of the Council's assessment process.

This reinforces the conclusion that the evidence base is not comprehensive.

Updated Evidence and Community-Led Call for Sites

The Sheffield Green Belt Alliance has undertaken a city-wide Call for Sites exercise in response to these identified gaps in the evidence base. This exercise has engaged over 1,000 contacts across Sheffield, including residents, landowners and local organisations, and has identified a significant number of additional brownfield opportunities.

This work has been undertaken to assist in addressing the acknowledged limitations in the Council's assessment and to ensure that all reasonable land options can be considered as part of the Examination process.

It builds upon earlier community evidence, including the Sheffield Green Belt Alliance's Brownfield Site List submitted as EXAM 141, which was accepted into the Examination but not assessed on a site-by-site basis.

Housing Supply, Distribution and Trajectory (MM90, MM91, MM92, MM93)

The housing supply figures set out in MM90, MM91, MM92 and MM93 are fundamentally affected by the omission of a substantial number of brownfield sites.

The identification of over 346 hectares of previously developed land represents a significant additional source of supply that is not reflected within the housing supply tables, spatial distribution or trajectory. Many of these sites are suitable for early delivery due to existing infrastructure, established residential context and, in some cases, public ownership.

The absence of these sites from the supply calculations results in an artificial shortfall, which in turn is used to justify the allocation of more constrained and less sustainable sites.

The housing trajectory set out in MM92 is therefore unreliable, as it does not reflect the full extent of deliverable land. Similarly, the five-year supply calculation in MM93 is based on incomplete data. The inclusion of additional brownfield sites would materially improve supply and reduce reliance on sites that are subject to significant constraints.

The omission of these additional sites is not simply a matter of completeness but materially affects the Plan's conclusions. Where evidence has not been fully assembled, the resulting housing supply position cannot be relied upon as a justification for the release of constrained or Green Belt land.

Windfall and Opportunity Sites (MM81)

Main Modification MM81 recognises the role of windfall and opportunity sites; however, the scale of brownfield land identified demonstrates that such sites are not incidental but form a substantial and consistent source of supply.

The Plan underestimates the contribution of windfall sites by failing to incorporate a comprehensive assessment of available land. The identified sites include former housing land, vacant urban plots,

land promoted through earlier stages of consultation, and sites currently available on the market. Many of these are small to medium-sized sites that are well suited to incremental development and intensification.

Given their scale and distribution, these sites should be treated as a core component of the housing supply rather than a residual category.

Site Allocations and Spatial Strategy (MM461A, MM11)

The failure to fully assess brownfield land availability has direct implications for the site allocations set out in Annex A (MM461A) and the broader spatial strategy.

The allocation of greenfield and Green Belt sites is justified on the basis of an assumed shortage of available land. However, the evidence presented demonstrates that this shortage is, at least in part, the result of an incomplete and outdated assessment of brownfield capacity.

Large previously developed areas, including Parkwood Springs and numerous former housing sites, demonstrate that opportunities exist within the urban area. Many of these sites benefit from existing infrastructure and are located within established communities, making them inherently more sustainable than peripheral greenfield allocations. These sites also present opportunities for intensification, including maisonettes and low-rise apartment development, thereby increasing capacity without expanding into undeveloped land.

The failure to identify and prioritise these sites undermines the justification for the spatial strategy set out in Policy SP2.

A further concern arises in relation to the availability and utilisation of existing employment land within Sheffield. Evidence indicates that a number of allocated and previously developed employment sites, together with units currently marketed for sale or lease, remain underused or vacant. This includes both large-scale logistics units and smaller industrial premises across established employment areas.

The persistence of vacancy and underutilisation demonstrates that supply is not being fully absorbed by the market and calls into question the need for additional large-scale employment allocations. In particular, where existing sites benefit from established infrastructure, known ground conditions and strategic connectivity, they represent a more viable and sustainable option than bringing forward highly constrained land.

The failure to fully utilise existing employment capacity before allocating new sites suggests that the Plan has not adequately aligned its employment land strategy with evidenced market demand, and therefore does not represent an efficient or justified use of land.

Implications for Soundness

The combined evidence from the brownfield study, the FOI response and the absence of a recent Call for Sites demonstrates that the Plan is not based on a proportionate, robust or up-to-date evidence base.

- The Plan is not positively prepared, as it fails to maximise the use of previously developed land.
- It is not justified, as it does not adequately consider reasonable alternatives.
- It is not effective, as it relies on allocations that are less deliverable than available brownfield sites.
- It is not consistent with national policy, which requires that brownfield land is prioritised and that Green Belt release is only justified in exceptional circumstances.

The failure to undertake a comprehensive Call for Sites since 2019 is particularly significant. The Examination evidence confirms that this was not supplemented by a full assessment of alternative sites due to resource constraints. As a result, the Plan cannot demonstrate that all reasonable alternatives have been considered.

This directly conflicts with the requirements of the National Planning Policy Framework, which requires plans to be based on proportionate and robust evidence and to consider reasonable alternatives before reaching conclusions on land release.

Conclusion

The evidence demonstrates that a substantial supply of previously developed land exists within Sheffield that has not been properly identified or incorporated into the Plan.

The identification of approximately 346.1 hectares of brownfield land, together with the Council's own evidence of extensive housing demolition and limited replacement, clearly indicates that opportunities for redevelopment within the urban area have not been exhausted.

The absence of an up-to-date Call for Sites and Brownfield Land Register further confirms that the evidence base is incomplete.

As a result, the housing supply, trajectory, distribution and site allocations set out in the Main Modifications are not reliable.

The Main Modifications do not address these fundamental shortcomings. Instead, they rely on the same incomplete evidence base, meaning that the issues identified through the Examination process remain unresolved.

It is also important to note that this work has been undertaken by a group of volunteers within a limited timeframe and without access to the full resources available to the Council. As such, the sites identified in this submission are not intended to represent an exhaustive list of all brownfield opportunities within Sheffield.

Despite these constraints, the exercise has identified a substantial number of previously developed sites across the city. This reinforces the likelihood that further suitable land remains available and has not yet been fully assessed. In parallel, landowners and developers have been encouraged to bring forward their own sites directly through the Main Modifications consultation process.

This submission should therefore be seen as part of an ongoing process of identifying and evidencing available brownfield land, rather than a fixed or complete dataset.

Required Modification

The Plan should be amended to:

- undertake a comprehensive and up-to-date Call for Sites and update the Brownfield Land Register;
- incorporate identified brownfield land into the housing supply;
- revise housing supply, trajectory and distribution accordingly;
- remove reliance on unnecessary Green Belt release.

Table 1 – Identified Brownfield Sites

The following table sets out the brownfield sites identified through independent analysis. Sites referenced as “EXAM 141” are drawn from the Sheffield Green Belt Alliance’s Brownfield Site List previously submitted to the Examination.

Site	Description	Hectares	Previous Use	For Sale	Council Owned	Comments
Walkley Primary School		0.345	school			housing
Woodhouse Trinity Methodist Church		0.052	church			housing
Record Tools	Parkway Works	0.691	industrial			
Page Hall Cinema		0.171	cinema			housing
Old New Inn	Duke Street	0.29	pub			edge of housing — ideal for flats
Ash House	Ash House Lane	1.05	large house / hotel			
Kenwood Suite	Kenwood Road	2.06	large hotel site with grounds			
Town Market and Dental	Charles Street	0.063	multi-storey dental — city centre			
Salvation Army	council owned	0.103	Salvation Army — listed building		Yes	
Old Town Hall		0.14	town hall	Yes	Yes	
Old Burgon and Ball Factory	Holme Lane	0.5	factory			
Limestone Cottage Lane / Claywheels Lane		18.12	factory			
Halifax Road		0.06	car sales			

Site	Description	Hectares	Previous Use	For Sale	Council Owned	Comments
Backmoor Road		0.125	for sale	Yes		CPO ready
Underhill Lane	Batchelors factory	0.667	factory			
Deerlands Avenue 1		0.696	housing		Yes	30 homes — ideal for flats
Deerlands Avenue 2		0.61	housing		Yes	30 homes — ideal for flats
Penistone Road (near Aldi)		1.99	retail			
Pye Bank Road	previous housing site	1.51	housing		Yes	70+ homes
Rear of tram stop, Eckington Way		2.25			Council?	
Station Road, Halfway		2.16	industrial			
Storrs Bridge Road		2.94	industrial			
Main Road, Darnall		0.278	housing		Yes	ideal for flats
Baslow Road		4.38	industrial			great for housing
Chipping House Road		0.243	flattened			
Alderson Road		0.091	retail			
Mansfield Road	for sale for housing	0.251	club	Yes		housing
Derbyshire Lane	for sale, with plots	0.846	flattened	Yes		housing or light industry
Upperthorpe Road	for sale for flats	0.067		Yes		flats
Stevenson Road	land for sale	0.192		Yes		
Longacre Way		0.473	flattened			retail / industry
Sandygate Road	plot for sale for flats — EXAM 141	0.144	cleared	Yes		housing

Site	Description	Hectares	Previous Use	For Sale	Council Owned	Comments
Cookwood Road		0.031	abandoned home			CPO
Broad Street	for sale	0.038	plot	Yes		next to another plot
Jaunty Road		0.003				
Broomspring Lane		0.11	plot	Yes		CPO
Wood Royd Road		0.15	abandoned			may be larger
Bardwell Road	promoted in plan response	0.166	industrial			
Infield Lane	vacant allotment site, promoted in Plan	5.76	abandoned allotments		Yes	
Collegiate Campus	offered by the university	3.76	university campus			promoted as available with all infrastructure in place
Crimicar Lane	offered in the plan responses	1.02	cricket ground			promoted as available
Queens Road	promoted in plan response	0.412	cleared			put forward in plan response
Roman Ridge Road	for sale	0.55	industry / retail	Yes		
Holme Lane	for sale	0.395	industry / retail	Yes		
Bold Street	for sale	0.038	small industry	Yes		
East Bank Road	for sale	0.52	small industry	Yes		
Carr Road, Deepcar	site for sale	1.7	retail / industry	Yes		ideal for housing
Carwood Road	land for sale	0.639	industry	Yes		
Brompton Road	land for sale	0.555	industry	Yes		
Attercliffe Common	land for sale	0.128	retail	Yes		

Site	Description	Hectares	Previous Use	For Sale	Council Owned	Comments
Broadfield Close	land for sale, with planning for 3-storey	0.13	retail	Yes		with planning for a 3-storey build
Athol Road	land for sale	0.102	small industry	Yes		
Fife Street		2.19	industry			close to another
Fife Street 1	EXAM 141	8.56	industry			close to another
Butterthwaite Lane		1.34	industry			close to another
Butterthwaite Lane 1		0.617	industry			close to another
Europa Link	EXAM 141	16.7	industry			close to another
Europa Link	not started	18	industry			close to another
Europa Link	EXAM 141	10.5	industry			close to another
Meadowhall Way	EXAM 141	9.26	industry			close to another
Weedon Street	EXAM 141	5.8	industry			close to another
Meadowhall Drive		0.993	industry			close to another
Jordanthorpe Parkway	EXAM 141	3.46	open			housing
Remington Road	EXAM 141	1.78	housing		Yes	
Deep Lane	EXAM 141	1.58	industry			
Grange Mill Lane	EXAM 141	1.55	industry			
Bellhouse Road	EXAM 141	0.606	housing		Yes	
Loxley Valley	EXAM 141	1.19	abandoned church			
Loxley Valley	EXAM 141	1.37	plot			

Site	Description	Hectares	Previous Use	For Sale	Council Owned	Comments
Wincobank Lane	EXAM 141	0.875	housing		Yes	housing
Petre Street	EXAM 141	0.216	industry			
Lyon Street	EXAM 141	0.715	industry			
Carlisle Street East	EXAM 141	0.615	industry			
Windmill Lane	EXAM 141	0.366	housing		Yes	
Green Lane	EXAM 141	0.135				
Leppings Lane	EXAM 141	0.232				
Wardsend Road	EXAM 141	0.715				
Loicher Lane	EXAM 141	1.72				
Brooklands Avenue	EXAM 141	0.392	housing		Yes	
Henley Avenue	EXAM 141	0.591				
Broad Street 1	EXAM 141	0.027				next to another
Old Lane	EXAM 141	0.942				
New Street	EXAM 141	1.33				
Winder Avenue	EXAM 141	1.28				next to another
Winder Avenue		0.554				next to another
Winder Avenue		0.242				next to another
Firshill Rise	EXAM 141	0.329	housing		Yes	
Norwood Drive	EXAM 141	0.692				

Site	Description	Hectares	Previous Use	For Sale	Council Owned	Comments
Bellhouse Road	EXAM 141	0.557	housing		Yes	
Gleadless Road	EXAM 141	1.07	industry			next to housing — ideal for housing
Staniforth Road	EXAM 141	5.83	housing			
Wardsend Road	EXAM 141	1.19				
Wardsend Road	EXAM 141	0.732				
Parkwood Springs	EXAM 141	72.9	housing and ski village		Yes	
Parkwood Springs 1	EXAM 141	5.24				
Livesey Street	EXAM 141	1.07				next to stadium
Livesey Street 1	EXAM 141	0.775				next to stadium
Busk Meadows	EXAM 141	0.417	housing			
Penrith Road	EXAM 141	0.173	housing			10 houses — ideal for flats
Sandygate Road	EXAM 141	0.184	abandoned site			
Ella Road	EXAM 141	0.158	cleared site		Council?	
Remington Road	EXAM 141	0.165	housing		Yes	
Remington Road	EXAM 141	0.147	housing		Yes	
Tunwell Avenue	EXAM 141	0.057	housing		Yes	
Deerlands Avenue	EXAM 141	0.215	housing			10 houses — ideal for flats
Mansel Crescent		1.08	housing		Yes	
Knutton Rise	EXAM 141	0.22	housing		Yes	

Site	Description	Hectares	Previous Use	For Sale	Council Owned	Comments
Donovan Road	EXAM 141	0.135	housing		Yes	
Donovan Close		0.149	housing		Yes	
Storrs Bridge Lane	EXAM 141	2.65	abandoned			
Loxley Valley		0.395	industry			
Low Matlock Lane	EXAM 141	0.922	factory			
Barnsley Road	EXAM 141	0.11	cleared site			
Greenland Road	EXAM 141	0.221	industry			
Barleywood Road		0.941	industry			
Shepcote Lane		4.7	industry			
Europa Way		4.5	industry			
Europa Link		12.3	industry			
Europa Link		1.39	industry			
Europa Avenue		5.62	industry			
Underhill Lane		0.376	industry			
Old Loxley Chapel		0.112	old chapel			
Aldene Road	EXAM 141	0.543	cleared site			
Fox Lane		0.92	housing		Yes	
Princess Street	EXAM 141	0.201	industry		Yes	
Windsor Street	EXAM 141	0.399	industry			

Site	Description	Hectares	Previous Use	For Sale	Council Owned	Comments
Clifton Street	EXAM 141	0.132	industry			
Beighton Road land	EXAM 141	0.257	industry			
Meetinghouse Croft land	EXAM 141	0.405	housing		Yes	
Manor Laithe Road	EXAM 141	0.471	housing		Yes	
Boundary Road		0.4	housing		Yes	
Chipping House Road	EXAM 141	0.199	industry			
Holme Lane	EXAM 141	0.195	industry			
Fisher Lane	EXAM 141	1.43	housing		Yes	
Fisher Lane	EXAM 141	0.072	housing		Yes	
Irving Street		0.087	housing		Yes	
Senior Road	EXAM 141	0.145	housing			
Birley Vale Close	EXAM 141	0.669	industry			
Hunsley Street	EXAM 141	1.39	industry			
Manor Lane		1.98	housing		Yes	
SCC Emergency Repairs	EXAM 141	3.22	industry		Yes	
Maltravers Road		0.813	housing		Yes	
Manor Oaks Road		0.734	housing		Yes	
Worthing Road	scrap site being cleared	0.43	industry			
Lumley Street		2.07	industry			

Site	Description	Hectares	Previous Use	For Sale	Council Owned	Comments
Parkway Works		0.167	industry			
Lumley Street		1.3	industry			
Carlisle Street		0.773	industry			
Victoria Station Road		0.547	industry			ideal for flats
Lound Side		0.156	bank			flats
Janson Street		1.82	commercial			
Wilfrid Road		0.118	commercial			
Darnall Road industrial estate		0.438	cleared site / industry			
Darnall Road		0.027	commercial			
Chapelwood Road		0.124	housing		Yes	
Orgreave Place		0.709	cleared industry			
Woodhouse Mill		2.94	cleared industry			
Woodhouse Mill 1		2.89	cleared site			ideal for housing
Meadowbrook Park		2.67	cleared industry			
Rotherham Road		0.551	industry			
Rotherham Road		0.177	industry			
Blagden Street		0.222	industry			
Sussex Street		0.582	commercial / cleared			
Swinton Street		0.195	cleared industry			

Site	Description	Hectares	Previous Use	For Sale	Council Owned	Comments
Cowper Avenue		1.18	housing		Yes	
New Brinsworth Road	may be Rotherham — usable with consultation/agreement	4.68	cleared site			could be Rotherham — usable with consultation
Bawtry Road		3.2	cleared site			housing
Charnock Drive		0.106			Yes	
Barnsley Road		0.334			Yes	housing
Knutton Rise		0.225	housing		Yes	
Wordsworth Avenue		0.33	housing		Yes	housing
Deerlands Avenue		0.244	housing		Yes	12 old houses — room for more with intensification
Buchanan Road		0.31	housing		Yes	14 old houses
Remington Road		0.123	housing		Yes	
Hazlebarrow Crescent		2.14	housing		Yes	40 old houses, plus large space at the rear from another old building
Norton Avenue		13.7	housing		Yes	large site
Penistone Road		0.248	retail			
Barnsley Road		0.173	car wash			ideal for housing
Southey Green Road		0.237	housing		Yes	
Deerlands Avenue		0.36	housing		Yes	
Penistone Road		0.282	retail			
Newbould Lane		0.414	underground car park			

Site	Description	Hectares	Previous Use	For Sale	Council Owned	Comments
Fulwood Road		0.316	old school			
	TOTAL HECTARES	346.1				

Additional sites identified online

The following sites have been identified through publicly available listings and are presented separately as supplementary evidence.

Site	Description	Hectares	Previous Use	For Sale	Council Owned	Comments
Cavendish Street	Wilson Carlile University residence	0.333	halls of residence	Yes		university selling off
Brailsford Avenue		0.12	pub			ideal for flats
Brightside Lane	for sale	3.2	industrial	Yes		
Egerton Lane	saw mill	0.062	saw mill	Yes		
Greenhead Lane	church	0.13	old chapel	Yes		housing
Loxley Road	garage	0.053	garage	Yes		housing
Effingham Street	units	0.354	industrial	Yes		