

Dear Inspectors,

Sheffield Plan Examination – Representation on Proposed Main Modifications. Spatial distribution of additional Green Belt release (MM10 Policy SP1; MM91 Table 2)

1. Summary

This representation concerns where the additional Green Belt release introduced through the Schedule of Proposed Main Modifications has been placed. MM10 (Policy SP1) names five strategic greenfield releases at Ecclesfield/Grenoside, Handsworth, Charnock, Lodge Moor and Chapeltown, with smaller releases at Oughtibridge, Wharnccliffe Side and Dore. MM91 (Table 2) updates how housing supply is split between the city's sub-areas to reflect those releases.

The result is uneven: on the Council's additional allocations evidence, 79% of the additional Green Belt housing release falls into the Northeast, Chapeltown/High Green and Southeast sub-areas. All of the additional Green Belt employment release - some 67.35 hectares - falls into the same parts of the city. The Schedule does not show how the cumulative impacts on the environment, infrastructure and local communities have been assessed. The Council's own IIA Modifications Report Addendum admits that the cumulative effects of the additional allocations "need to be explored further".

A separate but related concern, set out in section 4, is that the same concentration of release falls in and around the parts of Sheffield that, on the Indices of Multiple Deprivation 2025, already experience the highest levels of deprivation. Two MPs gave oral evidence to the Examination on this point.

We are not opposed to meeting Sheffield's housing requirement. Our concern is whether the spatial pattern of Green Belt release introduced by the Main Modifications is justified and effective under NPPF (September 2023) paragraph 35, and consistent with paragraphs 11, 31 and 141. We do not think it is.

Our primary request is that the Inspectors find this distribution unsound, and ask for it to be reconsidered. If not, we ask that the cumulative effects identified by the Council's own IIA be assessed before the Plan is adopted.

2. Relevant evidence

- **Schedule of Proposed Main Modifications**, in particular MM10 (the reworded Policy SP1, naming the five strategic greenfield releases); MM11 (Policy SP2, the spatial approach); MM68 (Policy SA5, Southeast Sub-Area, increasing the housing target from about 1,640 to about 3,013 new homes); MM91 (Table 2, distribution of housing supply by sub-area); MM92 and MM93 (housing trajectory and five-year supply); and the additional site allocations listed below;

- **Council additional allocations evidence (2025)**, showing the sub-area distribution of additional Green Belt housing release and the 67.35 hectares of additional Green Belt employment release;
- **IIA Update and Addendum (2026)**, and the IIA Modifications Report Addendum (Sheffield City Council, February 2026), in particular p.120 (cumulative effects of additional site allocations) and the SA topics on which the modified Plan performs less well than the submitted Plan;
- **Indices of Multiple Deprivation 2025** for the pattern of deprivation in Sheffield;
- **EXAM 196**: oral evidence of Marie Tidball MP (Penistone and Stocksbridge) at the Stage 4 hearing of 2 October 2025;
- **EXAM 214**: oral evidence of Clive Betts MP (Sheffield South East) at the Stage 4 hearing of 15 October 2025.

Taken together, this material shows the following:

- MM10 (the reworded Policy SP1) names five strategic greenfield releases: Ecclesfield/Grenoside, Handsworth, Charnock, Lodge Moor and Chapeltown. It also identifies smaller releases at Oughtibridge, Wharnccliffe Side and Dore. The named releases lean toward the north and east of the city.
- On the Council’s additional allocations evidence, the additional Green Belt housing release is unevenly distributed across the sub-areas. The figures are set out in Table A below.

Sub-area	Additional GB housing capacity	Share
North West	172	4%
Northeast and Chapeltown/High Green	1,395	36%
Southeast	1,697	43%
South	304	8%
South West	338	9%
Total	3,906	100%

Table A: Additional Green Belt housing release by sub-area (Main Modifications, Feb 2026).

- For employment the pattern is starker. The Council’s additional allocations evidence identifies 67.35 hectares of additional Green Belt employment release. All of it is in the Northeast/Chapeltown/High Green and Southeast sub-areas. None is in the North West, South or South West sub-areas.
- Combining housing and employment, about 95% of the additional Green Belt release introduced by the Main Modifications falls within the Northeast, Chapeltown/High Green and Southeast sub-areas. The site allocations follow the same pattern: NES36, NES37, NES38 and NES39 in the Northeast; CH03, CH04 and CH05 in

Chapelton/High Green; NWS30 and NWS31 (in postcode S35, in the north of the city); SES29 and SES30 in the Southeast (Handsworth/SL1); and SS19 in the South.

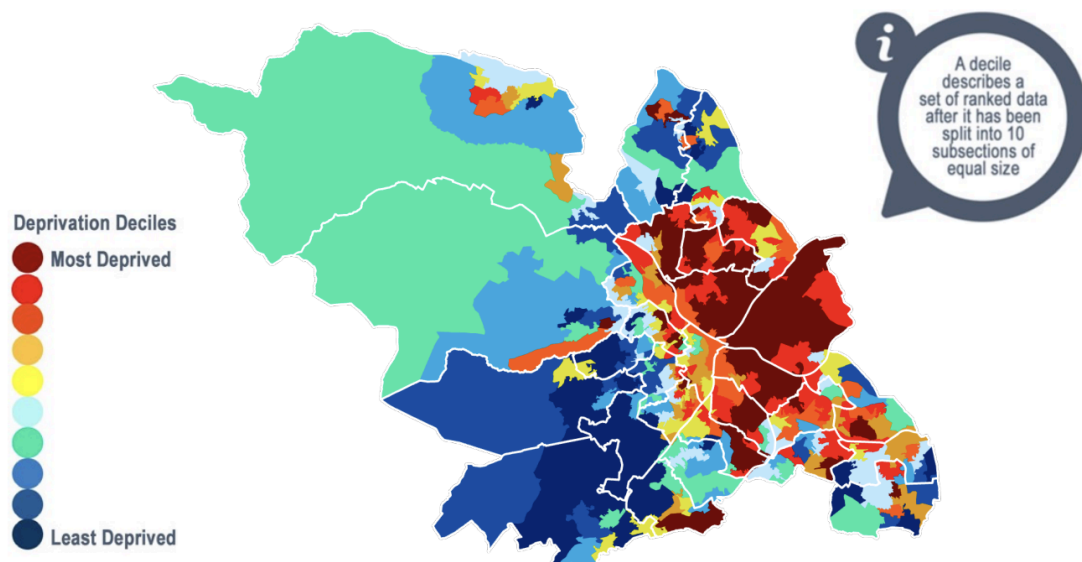
(e) The IIA Update and Addendum (2026) shows that the modified Plan performs less well than the submitted Plan on several SA topics, including soil and land use, landscape and visual impacts, biodiversity, and transport and accessibility. Those negative effects are not spread evenly. They follow the location of the additional sites, and so fall on the same Northeast, Chapelton/High Green and Southeast sub-areas in which the additional release is concentrated.

(f) The IIA Modifications Report Addendum (Sheffield City Council, February 2026) admits, at p.120, that the cumulative effects of the additional allocations have not yet been fully assessed:

“All changes to the site allocations have been considered in the appraisal of the ‘modified version’ of the Plan. Additional site allocations are likely to have cumulative effects on the IIA findings that need to be explored further. Changes to site conditions for all sites (existing and new site allocations) are also screened in to the assessment where appropriate.”

(g) On the Indices of Multiple Deprivation 2025 [citation: IMD 2025], the most deprived neighbourhoods in Sheffield are clustered in the east, north-east and inner urban parts of the city. Areas in or near those clusters include Darnall, Burngreave, Manor and Wybourn, Arbourthorne, Gleadless Valley, Firth Park, Shiregreen, Brightside, Southey, and inner-city neighbourhoods including Highfield. The pattern is a connected cluster, not dispersed, as shown in Figure 1 below.

Index of Multiple Deprivation 2025 in Sheffield LSOAs



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Figure 1: Index of Multiple Deprivation 2025 in Sheffield LSOAs. Source: Sheffield City Council, "Indices of Deprivation 2025 - Sheffield Summary" (November 2025). Reproduced under © Crown copyright and database rights 2025 Ordnance Survey 100018816.

- (h) The site allocations and these deprived neighbourhoods sit close together. For example: NES37 is next to Shiregreen and Southey; NES38 is next to Fox Hill; SES29 and SES30 are next to the Handsworth and Darnall edges; SS19 is next to Gleadless Valley. Within one to three miles, the Manor, Arbourthorne, Burngreave and Firth Park communities lie close to the SES, NES and Chapeltown/High Green allocations.
- (i) Two MPs gave oral evidence to the Examination on this point. Marie Tidball MP (Penistone and Stocksbridge), at the hearing on 2 October 2025 (EXAM 196), said:
- “Nine out of the fourteen Green Belt release sites are in the Penistone and Stocksbridge constituency... comprising 41% of new housing and 60% of new employment land. From what I can see there is currently insufficient justification for that disproportionate allocation... We need to see a wider spread across all community areas, especially in the central urban area and along mass transit corridors.”*

Clive Betts MP (Sheffield South East), at the hearing on 15 October 2025 (EXAM 214), said:

“You can’t have a plan... which is so biased that it puts the majority of the Green Belt sites... in the poorest, most deprived parts of the city, and exempts the most affluent parts of the city. That’s not fair. ... why then take away disproportionately the green open spaces from those communities and exempt development in the richer, more affluent parts of the city? It is fundamentally unfair and unjust.”

3. Soundness concern - concentration and cumulative impact

NPPF (September 2023) paragraph 35 requires a plan to be justified, effective and consistent with national policy, on the basis of evidence that meets paragraph 31. Paragraph 141 says that, when releasing Green Belt land, plans should give first consideration to land that is well-served by public transport.

The figures in section 2 show a strongly concentrated pattern: about 87% of the additional Green Belt housing release and 100% of the additional Green Belt employment release falls into three of the nine sub-areas. The site-specific Main Modifications describe the suitability of each individual allocation. They do not address the prior question we are concerned with: whether the overall pattern is itself an appropriate strategy. The Schedule does not show why a more even distribution was rejected, nor how the cumulative effects of concentrating release into the same parts of the city have been assessed.

That gap is admitted by the Council’s own evidence. The IIA Modifications Report Addendum (Sheffield City Council, February 2026, p.120) records that the additional site allocations “are likely to have cumulative effects on the IIA findings that need to be explored further.” That work has not been carried out. The evidence does not yet show how that further exploration has been completed or how it has informed the final distribution of additional Green Belt release..

We therefore think the spatial distribution of additional Green Belt release is not justified under NPPF §35(b): the alternatives have not been tested, and the cumulative effects have not been assessed. It is also not effective under NPPF §35(c): there is no evidence that the chosen distribution can be delivered without overloading local roads, public transport, schools, healthcare, open space, drainage and biodiversity networks. The IIA itself shows that the modified Plan performs less well than the submitted Plan on soil and land use, landscape and visual impacts, biodiversity, and transport and accessibility - negative effects which fall on the same sub-areas where the additional release is concentrated.

4. A separate concern - alignment with deprivation

Section 3 sets out a soundness concern about the spatial distribution in its own terms, against the NPPF tests of justified and effective. There is also a separate concern. The same concentration of additional Green Belt release falls in and around the parts of Sheffield that, on the IMD 2025, already experience the highest levels of deprivation.

The IIA is meant to look at how the Plan affects different groups of people, including those who are already disadvantaged. It shows that the modified Plan performs less well than the submitted Plan on a number of SA topics that affect day-to-day life for communities close to large new developments - transport and accessibility, landscape and visual impacts, biodiversity, and soil and land use. The Schedule of Main Modifications does not bring those topic-level findings together with the deprivation pattern across the city to show that the chosen distribution does not make existing inequalities worse.

Two of the city's MPs made the same point in oral evidence. Both Tidball MP (EXAM 196) and Betts MP (EXAM 214) described the distribution as unfair between the more affluent and the more deprived parts of the city. We ask that the examination to look at whether the Council's evidence shows that the spatial pattern is acceptable, when read alongside where deprivation falls in the city.

On current evidence, we do not think it has been shown to be acceptable. The site-by-site evidence does not explain why the additional Green Belt release falls where it does, when set against the cumulative effect on communities that already experience higher deprivation. That is a soundness concern under NPPF §35(b), separately from the concern in section 3.

5. Primary request

We ask that the Inspectors find the spatial distribution of additional Green Belt release introduced by the Main Modifications unsound under NPPF (September 2023) paragraph 35, together with paragraphs 31 and 141. The distribution should be reconsidered. If the concerns at sections 3 and 4 cannot be resolved on the evidence currently available, the affected allocations should be deleted or their capacities reduced.

6. If the additional Green Belt release is kept

If the Inspectors decide to keep the additional Green Belt release at the overall scale proposed, we ask that the cumulative effects identified by the Council's own IIA be assessed before the Plan is adopted, and that the findings are reflected in the site allocations and conditions on development.

7. Consequential changes

If the Inspectors agree with either request at sections 5 or 6, the Council will need to make consequential changes to the Plan and its evidence base.

8. Conclusion

The Main Modifications introduce a new Green Belt release. On the Council's own additional allocations evidence, that pattern of release is highly concentrated: about 87% of the additional Green Belt housing release and 100% of the additional Green Belt employment release falls into three of the nine Sheffield Plan sub-areas - Northeast, Chapelton/High Green and Southeast. The same concentration falls in and around the neighbourhoods which, on the IMD (2025), already experience the highest levels of deprivation.

The Schedule does not show how the cumulative impacts on the environment, infrastructure and local communities have been assessed. The Council's own IIA Modifications Report Addendum (February 2026, p.120) admits that the cumulative effects of the additional allocations "need to be explored further" - work that has not been carried out. On the evidence available, the spatial distribution of additional Green Belt release introduced by the Main Modifications is therefore not sound under NPPF (September 2023) paragraph 35, together with paragraphs 31 and 141.

The pattern should be reconsidered, or the cumulative effects identified by the Council's own IIA should be reassessed.

Yours faithfully,

Sheffield Green Belt Alliance