



5 May 2026

Dear Inspectors,

Sheffield Plan Examination - Representation on Proposed Main Modifications. Affordable Housing Deliverability: MM127, MM351 (NES37), MM411 (SES30), and also relevant to MM10 (Policy SP1), MM68 (Policy SA5), MM90-MM93 (housing supply tables and trajectory) and MM221 (Annex C Monitoring Framework, which embeds the 5,531 affordable housing target into the Plan).

1. Summary of representation

This representation concerns a soundness issue arising from the Council's affordable housing evidence for two proposed Green Belt allocations: SES30 (Land between Bramley Lane and Beaver Hill Road) and NES37 (Land between Creswick Avenue and Yew Lane).

EXAM 187 presents these allocations as delivering above the 30% S106 affordable housing requirement set by MM127 through a "Policy Plus" mechanism funded externally. For SES30, this is 20% additional affordable housing (174 homes), bringing the claimed total to 50%. For NES37, it is 10% additional affordable housing (61 homes), bringing the claimed total to 40%. Across the two sites, the Policy Plus element totals 235 homes.

EXAM 131 does not show either site to be viable at these higher affordable housing percentages through normal planning obligations. The additional homes are above the policy requirement set by MM127 and depend on external funding.

A Homes England FOI request asked about funding commitments, indicative allocations, letters of intent, heads of terms, or expressions of funding interest for the Sheffield Green Belt sites, naming SES30 and NES37 as the two strategic sites. Homes England confirmed (in RFI5626, dated 9 April 2026, enclosed) that they hold no such information for any of the sites and that, although they support some housing projects in Sheffield, they are not supporting any developments on Green Belt sites.

This representation should not be read as support for either allocation. My primary position is that SES30 and NES37 should not be allocated. If the Inspectors retain the allocations, the Plan must not rely on the additional Policy Plus affordable homes until they are shown to be viable, funded, secured and deliverable.

The Policy Plus homes are an important part of the claimed public benefit of allocating these sites and releasing them from the Green Belt. If that benefit is not evidenced as deliverable, it cannot be relied upon in the soundness assessment.

2. Relevant evidence

- MM411 describes the proposed SES30 allocation, and MM351 describes the proposed NES37 allocation. MM127 places both sites in the group of former Green Belt allocations subject to a 30% minimum affordable housing requirement, not a 50% requirement.

- EXAM 131 identifies SES30 as Site 9 (Bramley Lane and Beaver Hill Road) and NES37 as Site 4 (South of Wheel Lane / between Creswick Avenue and Yew Lane). The viability evidence does not show either site to be viable at the affordable housing levels claimed in EXAM 187 through normal planning obligations.
- EXAM 187 nevertheless counts SES30 as delivering 50% affordable housing (868 homes total: 434 market, 260 S106 affordable, 174 “Policy Plus” affordable) and NES37 as delivering 40% affordable housing (609 homes total: 365 market, 183 S106 affordable, 61 “Policy Plus” affordable). EXAM 187 explains that Policy Plus is affordable housing above the planning policy requirement, delivered through external funding and “enabled by Homes England funding opportunities”.
- The Homes England FOI response undermines that delivery assumption. The request asked about funding commitments, indicative allocations, letters of intent, heads of terms or expressions of funding interest for the Sheffield Green Belt sites, naming SES30 and NES37. Homes England replied that it holds no such information and confirmed that, although it supports some housing projects in Sheffield, it is not supporting any developments on Green Belt sites.

There is a further inconsistency for SES30. EXAM 187 uses the previous 868-home capacity, but EXAM 180 explains that SES30 was reduced by 41 homes to 827 homes, and MM411 now reflects the 827-home allocation. On that capacity, the equivalent 20% Policy Plus figure is around 165 homes, not 174. The Council’s affordable housing trajectory (MM92) and supply tables (MM90-MM93) have not been reconciled with the updated SES30 allocation.

3. Soundness concern

EXAM 187 counts 235 additional Policy Plus affordable homes from these two sites - 174 from SES30 and 61 from NES37 - as part of the Plan’s affordable housing supply. However, those homes are not required by MM127, are not shown by EXAM 131 to be viable through normal obligations, and are not supported by any recorded Homes England funding commitment or expression of funding interest.

This is not a minor issue. Those 235 homes form part of the stated public benefit of allocating SES30 and NES37 and releasing them from the Green Belt. If they are not deliverable, the affordable housing benefit has been overstated.

The Plan is examined under the September 2023 NPPF, but the Golden Rules in NPPF paragraphs 156 and 157 are not subject to transitional arrangements, and the Council’s own evidence (EXAM 131 paragraph 1.13) accepts that they apply to these sites. The Golden Rules require at least 50% affordable housing unless made unviable when tested under PPG. PPG paragraph 10-029-20241212 then disapplies site-specific viability for that purpose.

For SES30, MM127 sets the requirement at 30% and the Policy Plus mechanism is the device that provides the extra 20% to reach 50%. For NES37, the Policy Plus mechanism only provides an extra 10%, so even if it were delivered, the total would be 40% - itself below the Golden Rules threshold. Because the Policy Plus delivery is not evidenced for either site, the Plan is not consistent with national policy on Green Belt release.

In the absence of confirmed funding, an identified delivery partner, an updated viability position, or an enforceable mechanism, the Plan should not treat the Policy Plus homes as deliverable. SES30 and NES37 are not justified, not effective, and not consistent with national policy on Green Belt release.

4. Primary request

I request that the Inspectors find proposed allocations SES30 and NES37 unsound until the Council has demonstrated, with examination evidence, that the 235 Policy Plus affordable homes attributed to these sites (174 from SES30 and 61 from NES37) are deliverable.

Where such evidence is not provided, SES30 and NES37 should be deleted from the Plan. At minimum, the 235 Policy Plus affordable homes should be removed from the affordable housing supply and the Council should reassess whether the allocations, housing trajectory and Green Belt release remain justified.

5. Alternative request, while maintaining my objection

While maintaining my objection to the allocations, if the Inspectors retain SES30 or NES37, the Plan should be amended so that it does not rely on the additional Policy Plus affordable homes unless they are supported by documented evidence.

Suggested wording:

The SES30 and NES37 allocations shall not be relied upon as delivering affordable housing above the 30% requirement in Policy NC3 unless the Council has demonstrated, before adoption or through an evidenced delivery mechanism, that the additional Policy Plus affordable housing is viable and deliverable. This evidence should include confirmation of any external funding, the identity and role of any Registered Provider or delivery partner, the timing of delivery, and an updated viability assessment showing that the proposed affordable housing can be achieved alongside all site-specific infrastructure, mitigation and policy requirements.

If such evidence is not provided, the Plan should count only the 30% S106 affordable housing required by MM127.

6. Consequential changes required

- Remove the 235 Policy Plus homes (174 from SES30 and 61 from NES37) from the affordable housing supply unless they are evidenced as deliverable;
- Update EXAM 187 Table 1, the housing trajectory (MM92) and supply tables (MM90, MM91, MM93) accordingly;
- Reconcile the inconsistency between the 827-home capacity in MM411 and the 868-home trajectory used in EXAM 187 for SES30, and confirm whether NES37's 609-home trajectory in EXAM 187 reflects the current MM351 capacity;
- Reassess whether SES30 and NES37 remain justified as Green Belt releases under Policy SA5 (MM68) and Policy SP1 (MM10) if the additional affordable housing benefit is not secured; and

- Update the Annex C monitoring framework (MM221) and any other housing supply, affordable housing supply or Green Belt exceptional circumstances material affected by that change.

7. Conclusion

I object to the allocations of SES30 and NES37.

The Council has presented these sites as delivering 235 additional Policy Plus affordable homes - 174 from SES30 and 61 from NES37. The SES30 figure is based on the superseded 868-home capacity in EXAM 187, but the proposed allocation is now 827 homes, on which the equivalent 20% Policy Plus figure would be around 165 homes, not 174. None of these figures has been shown to be viable, funded, secured or deliverable.

EXAM 187 relies on external funding and Homes England funding opportunities for Policy Plus delivery, but the Homes England FOI response confirms that there is no recorded funding commitment, indicative allocation, expression of funding interest, or Homes England support for Green Belt development in Sheffield, including SES30 and NES37 (the two strategic sites named in the FOI request).

The allocations are not sound as drafted, because an important part of the claimed public benefit relied upon in the examination - additional Policy Plus affordable housing above the 30% policy requirement - has not been evidenced as deliverable. For NES37, the position is weaker still: even with the claimed Policy Plus, the total is only 40%, which is below the Golden Rules threshold. The Council's evidence is also internally inconsistent for SES30, because the affordable housing trajectory in EXAM 187 has not been updated to reflect the SES30 capacity in EXAM 180 and MM411.

The Council has moved from a general claim that future external funding may be available to a site-specific assumption that additional affordable homes will be delivered at SES30 and NES37. The Council has not justified that move. SES30 and NES37 should be deleted or, at minimum, the unevidenced Policy Plus affordable housing should be removed from the affordable housing supply and the Green Belt justification reassessed.

Yours faithfully,

Michael Parkin

Enclosure: Homes England FOI response RFI5626 dated 9 April 2026



Date: 9 April 2026

Our Ref: RFI5626

Tel: 0300 1234 500

Email: infogov@homesengland.gov.uk



By Email Only

Dear Sir/Madam,

RE: Request for Information – RFI5626

Thank you for your request for information which was processed in accordance with the Freedom of Information Act 2000 (FOIA).

You requested the following information:

Has Homes England made any written or verbal funding commitment, indicative allocation, letter of intent, heads of terms, or general expression of funding interest relating to any of the 14 greenbelt sites proposed for development in the Sheffield Local Plan? If so, please provide all relevant documents and confirm the date on which any such commitment or expression of intent was made.

I ask that you pay particular attention to the following sites which are designated as 'strategic sites' with Sheffield City Council the landowner:

- Site Reference SES30: Land between Bramley Lane and Beaver Hill Road, S13 7JH - S13 8UG and
- Site Reference NES37: Land between Creswick Avenue and Yew Lane, S35 8QN

Response

We can confirm that Homes England does not hold the information detailed in your request.

To conclude that the information is not held, we have searched with our Investments team, and our Markets, Partners and Places team, who would have the requested information if held.

The FOIA does not oblige a public authority to create information to answer a request if the requested information is not held. The duty under section 1(1) is only to provide the recorded information held.

The full text of section 1 in the legislation can be found here:

The Lumen
2nd Floor
St James Boulevard
Newcastle upon Tyne
NE4 5BZ

0300 1234 500
@HomesEngland
www.gov.uk/homes-england





Date: 9 April 2026

Our Ref: RFI5626

Tel: 0300 1234 500

Email: infogov@homesengland.gov.uk

<https://www.legislation.gov.uk/ukpga/2000/36/section/1>

We have a duty to provide advice and assistance in accordance with Section 16 of the FOIA. To comply with this duty we are able to confirm that Homes England are supporting some housing development projects in Sheffield, however we are not supporting any developments on green belt sites.

Right to Appeal

If you are not happy with the information that has been provided or the way in which your request has been handled, you may request an internal review. You can request an internal review by writing to Homes England via the details below, quoting the reference number at the top of this letter.

Email: infogov@homesengland.gov.uk

Information Governance Team
Homes England
The Lumen
2nd Floor
St James Boulevard
Newcastle Helix
Newcastle upon Tyne
NE4 5BZ
United Kingdom

Your request for review must be made in writing, explain why you wish to appeal, and be received within 40 working days of the date of this response. Failure to meet this criteria may lead to your request being refused.

Upon receipt, your request for review will be passed to an independent party not involved in your original request. We aim to issue a response within 20 working days.

You may also complain to the Information Commissioner's Office (ICO) however, the Information Commissioner does usually expect the internal review procedure to be exhausted in the first instance.

The Information Commissioner's details can be found via the following link:

<https://ico.org.uk/>

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Date: 9 April 2026

Our Ref: RFI5626

Tel: 0300 1234 500

Email: infogov@homesengland.gov.uk

Please note that the contents of your request and this response are also subject to the Freedom of Information Act 2000. Homes England may be required to disclose your request and our response accordingly.

Yours sincerely,

The Information Governance Team

For Homes England

The Lumen
2nd Floor
St James Boulevard
Newcastle upon Tyne
NE4 5BZ

0300 1234 500
@HomesEngland
www.gov.uk/homes-england

