



5 May 2026

Dear Inspectors,

Sheffield Plan Examination - Representation on Proposed Main Modifications. Coal Mining Risk Assessment Conditions: MM350, MM351, MM440, MM441, MM459, MM460 and MM461

1. Summary of representation

This representation concerns a soundness issue arising from the Schedule of Proposed Main Modifications. EXAM 188 identifies coal mining risks affecting several proposed allocations, but the site-specific conditions in the Main Modifications do not address those risks.

This representation should not be read as support for the development of these sites. My primary position is that the affected sites should not be allocated. If the Inspectors retain any of these allocations, the Plan must include enforceable Coal Mining Risk Assessment ("CMRA") requirements, and the Council should reassess whether the assumed site capacities remain justified.

2. Relevant evidence

- EXAM 188 records advice from the Mining Remediation Authority and subsequent assessment by the Council. It identifies coal mining risks affecting proposed allocations, including sites within Development High Risk Areas, sites with recorded or probable shallow workings, coal outcrops, and, in some cases, recorded mine entries.
- The Mining Remediation Authority explains that where coal mining features are present, they may pose risks to surface stability and public safety. Where mine entries are present, their zones of influence may need to be avoided, which can affect the amount of development a site can accommodate.
- The Schedule of Proposed Main Modifications includes a CMRA condition for MM410 (SES29) and MM411 (SES30). Equivalent wording is absent from the Main Modifications for the following sites, despite EXAM 188 identifying coal mining risk issues:

Site	Main Modification	Issue
NES36	MM350	CMRA requirement appears to be missing
NES37	MM351	CMRA requirement appears to be missing
SWS18	MM440	CMRA requirement appears to be missing

SWS19	MM441	CMRA requirement appears to be missing
CH03	MM459	CMRA requirement appears to be missing
CH04	MM460	CMRA requirement appears to be missing
CH05	MM461	CMRA requirement appears to be missing

The Schedule of Proposed Main Modifications is the document intended to make the Plan sound. This omission therefore means that the affected allocations do not reflect the Council's evidence.

3. Soundness concern

The Plan relies on these proposed additional site allocations for housing supply. Where mine entries, shallow workings or coal outcrops constrain layout or reduce the net developable area, that goes directly to whether the allocations are justified, effective and deliverable at their assumed capacities.

In the absence of CMRA requirements, future applicants and decision-makers would lack allocation-specific requirements for addressing the known land stability and public safety risks. That weakens the effectiveness of the Plan. It also raises a question of justification, because the assumed capacities have not been tested against the constraints that EXAM 188 identifies.

This concern is part of a wider issue with whether the Council has tested the capacity of its proposed allocations against known site constraints, which is addressed in a separate representation by the Sheffield Green Belt Alliance (SGBA).

4. Primary request

I request that the Inspectors find the affected allocations unsound unless and until the Council has demonstrated, both during this examination and in the adopted Plan, that the coal mining risks identified in EXAM 188 have been assessed and that the assumed capacities remain justified.

Where such evidence is not provided, the affected allocations should be deleted or their capacities reduced to reflect the unresolved constraints.

5. Alternative request, while maintaining my objection

While maintaining my objection, if the Inspectors retain any of the affected allocations, the site-specific conditions should be amended to include a CMRA requirement.

Suggested wording:

A Coal Mining Risk Assessment is required at the planning application stage where a site layout is submitted. The assessment must identify any coal mining features affecting the site, including recorded or probable shallow workings, coal outcrops, mine entries and any relevant zones of influence. It must also identify any mitigation,

treatment, remediation or layout restrictions necessary to address land instability and public safety risks. Development should not be permitted unless the assessment demonstrates that the proposed layout and amount of development can be safely accommodated.

For sites where mine entries are recorded or suspected, the condition should require the CMRA to locate the mine entries, assess their condition, calculate any zones of influence, and identify any no-build areas.

6. Consequential changes required

Before the Plan is adopted, the Council should review the indicative capacity of each affected site and, where capacity is reduced, update the housing trajectory and the justification for Green Belt release.

7. Conclusion

I object to the allocation of NES36, NES37, SWS18, SWS19, CH03, CH04 and CH05. EXAM 188 identifies coal mining risks affecting these sites, but the Schedule of Proposed Main Modifications does not include the CMRA requirements for all affected sites.

The affected allocations are therefore not sound as currently drafted. They should be deleted or, at minimum and while maintaining my objection, amended to include specific CMRA requirements and revised capacity assumptions where the constraints reduce the developable area.

Yours faithfully,

Michael Parkin