



5 May 2026

Dear Inspectors,

**Sheffield Plan Examination - Representation on Proposed Main Modifications.
Community Facilities at Strategic Location 1 (Handsworth): MM410 (SES29) and
MM411 (SES30)**

1. Summary of representation

This representation concerns soundness issues arising from the Council's failure to secure the community facilities that its evidence base identifies as required to make Strategic Location 1 (Handsworth) sustainable.

MM410 allocates 870 homes at SES29 and MM411 allocates 827 homes at SES30. Together they form Strategic Location 1 (Handsworth), comprising 1,697 homes. The Council's Integrated Impact Assessment (Feb 2026) and the CIL and Planning Obligations SPD both treat 1,000+ dwellings (whether on a single site or in combination) as the threshold at which new community facilities are required to make development sustainable. Strategic Location 1 surpasses that threshold.

However, neither MM410 nor MM411 secures any community facility as defined by the SPD. MM411 temporarily safeguards land for a secondary school and a multi-faith burial ground, but neither is a community facility within that definition, and the safeguarding wording invites alternative proposals at the first plan review.

This representation should not be read as support for SES29 or SES30. My primary position is that the allocations should not be retained. If the Inspectors retain them, the site-specific conditions must secure community-facility provision through on-site delivery or a binding Section 106 contribution.

2. Relevant evidence

- **MM410 and MM411** allocate SES29 (870 homes) and SES30 (827 homes), together forming Strategic Location 1 (1,697 homes). The Council has combined these sites into a single Strategic Location to support the case for their release from the Green Belt.
- **IIA Paragraph 7.1.11** (Feb 2026) states that "Provision of community facilities will be required to make major residential developments sustainable." For the purpose of the Council's CIL and Planning Obligations SPD community-facilities guideline, major residential developments are developments providing 1,000 or more dwellings, applied "either individually or a combination of sites".
- **The CIL and Planning Obligations SPD (December 2015)** defines Community Facilities for the purpose of developer contributions as "local shops, meeting places,

sports venues, cultural buildings, public houses, places of worship and other local services... such as; community centres, youth clubs, libraries, information and advice centres.” Education is governed by a separate infrastructure category (Theme 3); Community Facilities sit under Theme 4.

- **The site conditions in MM411** safeguard land for a secondary school and a multi-faith burial ground but state that “any alternative proposals in relation to this land will be considered as part of the first review of the Plan if necessary.” No community facility within the SPD’s definition is *secured* by either MM410 or MM411.
- **MM97** confirms that a new developer-contributions SPD has yet to be developed, meaning the 2015 SPD remains the operative reference.

3. Soundness concern

The Council has combined SES29 and SES30 into Strategic Location 1, a 1,697-home Green Belt release. Having done so, the Council cannot then treat the sites separately for the purpose of the infrastructure threshold its evidence requires. IIA Paragraph 7.1.11 is explicit that the 1,000+ threshold applies “either individually or a combination of sites,” and the SPD identifies community facilities as the infrastructure required to make such developments sustainable.

Yet the site-specific conditions in MM410 and MM411 do not secure any community facility within the SPD’s definition. Safeguarded land for a school and a burial ground does not meet the requirement: education is a separate infrastructure category in the SPD; a burial ground does not meet the everyday social-infrastructure need identified by the IIA; and either way the safeguarding wording is contingent, inviting “alternative proposals” at the first plan review; they may never materialise.

The Plan is therefore not justified (NPPF paragraph 35(b)). The IIA and SPD identify community facilities as required to make 1,000+ dwelling developments sustainable. By failing to write that requirement into the site-specific conditions, the Plan adopts a strategy inconsistent with its evidence base.

The Plan is not effective (NPPF paragraph 35(c)). A sustainable community of 1,697 homes is not deliverable when the site-allocation rules do not secure a single meeting place, library, community centre or local shop, and when the only safeguarded uses are liable to be replaced at the next plan review.

The Plan is not consistent with national policy (NPPF paragraph 35(d)). NPPF paragraphs 8 and 11 require plan-making to support sustainable development through, among other things, social infrastructure that meets communities’ needs. If the Golden Rules at NPPF paragraphs 156–157 are read as requiring Green Belt releases to be supported by necessary community infrastructure, Strategic Location 1 does not meet that requirement: it is a Green Belt release, and the Main Modifications do not secure the community facilities that the Council’s evidence identifies as necessary.

4. Primary request

I request that the Inspectors find MM410 and MM411 unsound until the Council has demonstrated, through site-specific policy wording, that the community facilities required by IIA Paragraph 7.1.11 and the CIL and Planning Obligations SPD will be secured at Strategic Location 1.

Where such evidence is not provided, the allocations should be deleted, or their justification - including the case for Green Belt release - reassessed to reflect that the development is not, according to the Council's evidence, sustainable.

5. Alternative request, while maintaining my objection

While maintaining my objection to the allocations, if the Inspectors retain SES29 and SES30, the site-specific conditions in MM410 and MM411 should be amended to include a community-facilities requirement.

Suggested wording:

In accordance with IIA Paragraph 7.1.11 and the CIL and Planning Obligations SPD, development at Strategic Location 1 shall provide on-site community facilities, or secure a binding Section 106 contribution towards equivalent off-site community facilities in the local area, sufficient to make the development sustainable. Safeguarded land for education or burial provision shall not count towards this requirement unless a distinct, publicly accessible community-facility use is secured, including the nature of the facility, access arrangements, management, affordability, phasing and delivery mechanism.

6. Consequential changes required

If the Plan cannot demonstrate that community facilities will be secured at Strategic Location 1, the Council should:

1. Reassess whether SES29 and SES30 remain justified as Green Belt releases under Policy SA5 (MM68) and Policy SP1 (MM10);
2. Update the IIA scoring for Strategic Location 1 to reflect that the community-facilities provision on which a positive sustainability conclusion depends has not been secured; and
3. Update any other supply, infrastructure or Green Belt exceptional-circumstances material affected by that change.

7. Conclusion

I object to the allocation of SES29 and SES30.

The Council's evidence - the IIA and the CIL and Planning Obligations SPD - identifies community facilities as required to make a 1,000+ dwelling development sustainable. The Council has combined SES29 and SES30 into a 1,697-home Strategic Location to support the case for Green Belt release, meeting that threshold. Yet the site-specific conditions in MM410 and MM411 do not secure any community facility within the SPD's definition. The only related provision - *temporarily* safeguarded land for a school and a burial ground - does not meet the requirement and is liable to be replaced at the next plan review.

The allocations are therefore not sound as drafted. They should be deleted or, at minimum and while maintaining my objection, amended to secure community-facility provision through on-site delivery or a binding Section 106 contribution.

Yours faithfully,

Michael Parkin