



5 May 2026

Dear Inspectors,

**Sheffield Plan Examination - Representation on Proposed Main Modifications.
Treatment of Existing Open Space at S02502: SES30 (MM411).**

1. Summary of representation

This representation concerns proposed allocation SES30, Land between Bramley Lane and Beaver Hill Road, and in particular the treatment of parcel S02502, which forms part of the allocation.

The Council's own evidence is internally contradictory on whether S02502 contains existing open space. The Council's appraisal material refers to the "Loss of accessible natural greenspace adjacent to Beaver Hill", while EXAM 130 records "No existing open space on-site". Both cannot be right.

The Council justifies the inclusion of S02502 on the basis that there is "sufficient open space in the surrounding area". However, the Council's own site appraisal methodology, including EXAM 130 and EXAM 130B, treats two matters as separate:

- Whether there is sufficient open space in the surrounding area; and
- Whether there is existing open space on the site which is required for its current function, may be needed for another open-space function, or otherwise needs to be retained, replaced or justified.

EXAM 130B contains examples where sites were ruled out despite the appraisal also recording sufficient open space in the surrounding area. The Council did not treat surrounding-area sufficiency as a complete answer to the loss of onsite open space. That same approach has not been applied to S02502.

S02502 has been included within SES30 and is relied upon to help gain access to the larger parcel S03020. Yet the Council's evidence treats the loss of S02502's open-space function as neutral or absent. That is inconsistent with the Council's own methodology and with the treatment of other sites.

This representation should not be read as support for the allocation of SES30. My primary position is that SES30 should not be allocated. If the Inspectors retain SES30, the Plan must include site-specific wording requiring the status, function, loss, replacement and access implications of S02502 to be assessed and resolved before development proceeds.

2. Relevant evidence

EXAM 130B uses the same methodology as the Selection of Sites for Green Belt Release Topic Paper (EXAM 130), and records onsite open-space function and surrounding-area sufficiency as separate matters. Three examples illustrate the point.

S02897, Land adjacent former Norton Aerodrome, Norton Avenue was ruled out due to fundamental constraints. The summary records that the western portion of the site, in Sheffield City Council ownership, is in open-space use as Bowman Drive Recreation Ground. The suitability assessment records both that there is a facility onsite which should not be lost, and that existing open-space areas of the site are required for their current function. At the same time, it records “Sufficient open space in the surrounding area - more than 20% above policy standard.”

S03088 / S03064, Land to the East of Limb Lane was also ruled out due to fundamental constraints. The summary records that the northern part of the site is in open-space use as Limb Lane Playing Fields, also a Local Green Space / sports pitch. The suitability assessment records that existing onsite open space is surplus but may be needed for another open-space function, while also recording “Sufficient open space in the surrounding area - more than 20% above policy standard.”

S01883 / S01833, Land to the East and West of Cross Lane was ruled out due to fundamental constraints. The summary records that part of the site east of Cross Lane is an unused outdoor sports ground, Ash House Sports Ground. The suitability assessment records that existing onsite open space is surplus but may be needed for another open-space function, and that the former playing pitch may be afforded protection. It also records “Sufficient open space in the surrounding area - more than 20% above policy standard.”

In each case the surrounding area was recorded as having more than 20% above the policy standard, yet the onsite open-space issue was still treated as relevant and constraining.

3. The inconsistency with S02502

The same logic should apply to S02502. SES30 comprises S03020 and S02502. My previous representation (REF1.892, July 2025) and supporting evidence identify S02502 as accessible natural greenspace (a type of open space) with an informal recreational function. As section 1 records, the Council’s own evidence is internally contradictory on whether the site contains open space at all.

The Council may say that there is sufficient open space in the surrounding area. But that does not answer the point. The existence of sufficient surrounding open space is an area-wide quantity assessment. It is not a site-specific finding that S02502 is surplus to requirements, has no existing function, has no community value, can be lost without replacement, or can be used for access without unacceptable harm to its open-space function.

That is the distinction the Council applies in EXAM 130B. For S02897, S03088 / S03064 and S01883 / S01833, the Council records onsite open-space issues separately from surrounding-area sufficiency, and treats the onsite issue as relevant and constraining even where the surrounding area is recorded as more than 20% above the policy standard.

S02502 has not been treated in the same way. It has been included within SES30 and is relied upon as part of the access solution for S03020, while its open-space function has not been recognised in the site-selection evidence.

The IIA shows the same pattern. It uses “Loss of Open Space” and “Sufficient existing Open Space in the surrounding area” as separate appraisal criteria, distinguishing the two issues in the same way as EXAM 130B. Yet the IIA scores loss of open space at S02502 as neutral despite the site being accessible natural greenspace. The same methodological inconsistency therefore runs through both the site-selection evidence and the sustainability appraisal.

4. Soundness concern

NPPF (Sept 2023) paragraph 99 sets out three tests for building on existing open space: that the land has been shown to be surplus to requirements; that the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or that the development is for alternative sports and recreational provision whose benefits outweigh the loss. A general finding of sufficient open space in the surrounding area satisfies none of those tests.

SES30 is therefore not sound as currently evidenced.

The allocation is not justified (NPPF paragraph 35(b)). The Council has not applied its open-space methodology consistently. EXAM 130B treats onsite open-space function and surrounding open-space sufficiency as separate matters, and treats the onsite issue as relevant even where surrounding sufficiency is recorded. The Council has relied on surrounding-area sufficiency in relation to S02502 without demonstrating that S02502 itself is surplus, replaceable, or capable of being used for access without unacceptable loss of open-space function.

The allocation is not effective (NPPF paragraph 35(c)). The development depends on S02502 to help unlock access to S03020. If S02502 is retained, replaced, or required for another open-space function, the access strategy and capacity of SES30 may change.

The allocation is not consistent with national policy (NPPF paragraph 35(d)). Existing open space should not be built on unless one of the three NPPF paragraph 99 tests is met. That assessment has not been provided for S02502.

5. Primary request

I request that the Inspectors find SES30 unsound until the Council has:

- confirmed whether S02502 is identified as existing open space, accessible natural greenspace, or land with an informal recreational function;
- identified the assessment relied upon to show that S02502 is surplus to requirements, or explained what equivalent or better replacement provision would be secured;
- explained why surrounding-area sufficiency is being treated as sufficient to justify the loss of S02502 when EXAM 130B treats onsite open-space function as a separate constraint on other sites; and
- confirmed whether S02502 was deducted from the net developable area, and how access to S03020 would be achieved if S02502 is retained, replaced, or required for another open-space function.

Where such evidence is not provided, SES30 should be deleted from the Plan, or its capacity reduced to reflect the unresolved open-space and access constraints.

6. Alternative request, while maintaining my objection

While maintaining my objection to the allocation, if the Inspectors retain SES30, the site-specific allocation wording should be amended to include an open-space requirement.

Suggested wording:

Before any planning application is determined, the applicant shall submit an open-space assessment identifying the status, function and extent of S02502, including any identification as accessible natural greenspace and any informal recreational use. The assessment shall demonstrate whether the land is surplus to requirements or, if not, how any loss will be avoided or replaced by equivalent or better provision in terms of quantity and quality in a suitable location. A general finding that there is sufficient open space in the surrounding area shall not, by itself, be treated as demonstrating that S02502 is surplus to requirements. The assessment shall also explain how any proposed access through S02502 can be achieved without unacceptable loss of existing open-space function. The net developable area and housing capacity shall be reduced where necessary to reflect any open-space retention, replacement, no-build area, access constraint or mitigation requirement.

7. Consequential changes required

Before the Plan is adopted, the Council should:

1. Review the SES30 site pro forma;
2. Update the IIA scoring for S02502 and SES30;
3. Update the housing trajectory in light of any change to the SES30 capacity; and
4. Reassess the justification for releasing SES30 from the Green Belt.

Where the loss of S02502 cannot be justified in accordance with national policy, the parcel should be removed from the developable area, retained as open space, replaced by equivalent or better provision, or the allocation should be deleted.

8. Conclusion

I object to the allocation of SES30.

EXAM 130B shows that the Council's own methodology treats onsite open-space function and surrounding-area sufficiency as separate matters. Sites such as S02897, S03088 / S03064 and S01883 / S01833 were ruled out on onsite open-space grounds even where the appraisal recorded sufficient surrounding open space. S02502 has not been treated in the same way.

The allocation is therefore not justified, not effective and not consistent with national policy as currently evidenced. SES30 should be deleted or, while maintaining my objection, the open-space assessment, IIA scoring, capacity and access strategy should be corrected and a specific open-space condition included.

Yours faithfully,

Michael Parkin