

Consultation Submission on the Draft Sheffield Plan (Proposed Additional Site Allocations)

To: Sheffield Plan Team, Strategic Planning Service

From: Councillor Alison Norris and Councillor Mick Rooney, Woodhouse Ward

Date: 11th July 2025

Subject: Formal Representation on the Sheffield Plan - Proposed Additional Site Allocations (Consultation Period 29 May 2025 - 11 July 2025)

1.0 Introduction and Summary of Position

1.1 Introduction

This document constitutes the formal representation of Councillor Alison Norris and an additional representation from Councillor Mick Rooney, the elected representatives for the Woodhouse Ward of Sheffield. This submission is made in response to the public consultation on the Sheffield Plan - Proposed Additional Site Allocations, which commenced on 29 May 2025.¹ It is intended for formal consideration by the independent Government Inspectors as part of the public examination of the Sheffield Plan, in accordance with the procedures established by Sheffield City Council.² As ward councillors, we have a statutory duty to represent the interests of our constituents and to scrutinise proposals that will have a profound and lasting impact on the communities we serve.

1.2 Summary of Position

We support the fundamental principle of establishing a new, up-to-date Local Plan for Sheffield. The city faces an undeniable and acute housing crisis that requires a strategic, plan-led response. However, we must register our strongest possible objection to the Proposed Additional Site Allocations in their current form. It is our contention that the plan, as amended, is fundamentally **unsound, inequitable, and ineffective**, and therefore fails to meet the requirements of the National Planning Policy Framework (NPPF).

- **Unsound:** The amended plan is unsound because it is unjustified. The evidence supporting it is not sufficiently detailed to demonstrate that the harms caused by the proposed green belt release are offset by sufficient potential benefit. The site selection methodology is inconsistently applied, and reasonable alternatives have not been adequately assessed.
- **Inequitable:** The plan is inequitable because the underlying spatial strategy is demonstrably unbalanced. It proposes to place a disproportionate burden of Green Belt development on established communities in the south-east and north-east of the city, including our own ward of Woodhouse and the neighbouring communities of Handsworth and Richmond. Very few Green Belt sites in more affluent areas have been selected for release, despite similar scoring for several available sites and a lack of affordable homes in these areas. This approach entrenches existing socio-economic division.
- **Ineffective:** The plan will be ineffective in its stated aim of creating sustainable communities. The concentration of development in specific areas will place a strain on already overstretched infrastructure. This will lead to severe and predictable negative consequences for traffic congestion, air quality, public health, and access to

essential local services, particularly healthcare, degrading quality of life for new and existing residents.

1.3 Summary of Proposals

In light of these fundamental failings, we formally propose that the Planning Inspectorate recommend the following modifications to the plan to render it sound, fair, and fit for purpose:

1. The **removal of sites SES29 (Land at Handsworth Hall Farm / Finchwell Road) and SES30 (Land between Bramley Lane and Beaver Hill Road)** from the schedule of additional site allocations due to the severe, localised, and cumulative harm their development would cause.
2. **Reassessment and rebalancing of the proposed Green Belt release allocations** to achieve a more sustainable and equitable distribution of development across the city. This must include a transparent and consistent re-evaluation of the available sites.

2.0 Supporting the Principle of a New Local Plan for Sheffield

2.1 Acknowledging the Housing Crisis

This submission's objections must be understood in the correct context. We unequivocally agree with the core premise driving the Local Plan: Sheffield is in the grip of a severe and worsening housing crisis that demands a robust, plan-led solution. The evidence for this crisis is clear and its consequences are felt daily by our residents^{3,4,5}. We do not oppose the need for new homes; we oppose the unfairness of the additional burden on Woodhouse and Handsworth given the proposed additional development through the release of sites SES29 and SES30.

2.2 The Necessity of a Plan-Led Approach

In the absence of a sound local plan, the city becomes vulnerable to a barrage of speculative, developer-led applications. This "planning by appeal" approach does not serve the city's strategic interests, fails to deliver the right types of housing in the right places, and undermines the ability to secure necessary infrastructure and affordable housing contributions.

Rejecting the Local Plan outright would leave Sheffield's planning system reliant on outdated policies, giving developers the upper hand and making all of the city's green spaces, including the Green Belt, more vulnerable to unplanned and undesirable development.^{6,7}

In their stage 2 post hearings letter to Sheffield City Council in February 2025, the planning inspectors state:

"Homes England indicated at the hearing that Sheffield is one of their top current locations in England for partnership and funding work and that having allocation sites in an adopted local plan can aid funding applications. As such they stressed the need to attain an adopted plan soon."⁸

3.0 Formal Objection: Unsound due to unjustified concentration of development

The concentration of development in our ward, which is compounded by the release of these two additional sites, undermines the social and economic objectives outlined in the NPPF, paragraph 8: the level of development makes the development of well-designed places impossible and mitigates against the provision of services and open space that would support the community's well-being. It will also harm the environment and make pollution and carbon emissions worse, which mitigates against the move to a low carbon economy.

A sound Local Plan must distribute development in a way that reduces socio-economic inequalities, makes efficient use of existing and planned infrastructure, and avoids placing a disproportionate burden on specific communities. The spatial strategy presented in the Proposed Additional Site Allocations document represents a failure to adhere to this principle.

Furthermore, in the inspectors' letter of February 2025 the following assumption is made:

"For example, most growth in Sheffield city centre is anticipated to be flatted development whereas a wider mix including family houses is likely on land in the suburbs or on potential Green Belt sites."⁸

We contest that assumption. There is evidence that families are happy to live in flats in the city centre where these are appropriately designed and where appropriate infrastructure is provided. Green Belt does not need to be released primarily to meet the objective of providing more family homes. Indeed, providing single family homes in the suburbs may be an outdated model that itself undermines the principle of sustainable development.^{9,10}

3.2 Evidence of Gross Imbalance

The proposed additional Green Belt allocations are unfairly concentrated in the north-east and, particularly, the south-east of the city.

Analysis of the Council's own proposals reveals that approximately 69.78% of the proposed new housing sites on Green Belt land are located in the north-east and south-east of Sheffield.¹¹ This has been highlighted by the Member of Parliament for Sheffield South East, Clive Betts, who notes that the Handsworth area is being asked to accommodate over 40% of the entire city's **new** Green Belt housing allocation.¹²

This disparity is a recurring theme in feedback from residents and local representatives, who have consistently described the distribution as "not fair, it's not balanced".¹³ The plans would see a cumulative total of 1,638 new homes built on Green Belt land in the plan period in Handsworth alone, across two major sites.¹² In stark contrast, the affluent western suburb of Dore is allocated just 82 homes.¹⁴ This is a strategy of concentration that places the heaviest burden on communities that are already experiencing significant challenges.

The table below provides a clear, quantitative illustration of this disparity, collating the proposed housing allocations by city sub-area.

Table 1: Geographical Distribution of Proposed Additional Green Belt Housing Allocations

City Sub-Area	Site Reference(s)	Site Location	Proposed Housing Units	Sub-Area Total	% of Total
South-East	SES29	Handsworth Hall Farm	870	1,738	44.1%
	SES30	Bramley Lane/Beaver Hill Rd, Handsworth	868		
	SES31	South of White Lane, Gleadless	44		
North-East	NES37	Creswick Ave/Yew Ln, Grenoside	609	954	24.2%
	NES38	Holme Ln Farm/Fox Hill Rd, Grenoside	336		
	NES39	Wheel Ln/Middleton Ln, Grenoside	9		
North-West	NWS30	Forge Lane, Oughtibridge	69	275	6.97%
	NWS31	Storth Ln/School Ln, Wharncliffe Side	103		
	NWS32	East of Chapeltown Road	103		
South-West	SWS18	Lodge Moor Rd/Redmires Conduit	258	340	8.67%
	SWS19	North of Parkers Lane, Dore	82		

<i>Mixed-Use/ Other</i>	MU1	Handsworth Hall Farm (part)	7	590	16%
	CH05	Land at former Dyson Refractories	549		
	CH03/CH04	Cemetery Sites	34		
TOTAL				3,941	100%

Source: Compiled from Sheffield City Council consultation documents and media reports.¹¹

Note: Figures represent estimated capacity and may vary slightly between sources. The core imbalance remains consistent.

This data demonstrates the inequity of the plan's spatial strategy for greenbelt release.

3.3 Entrenching Socio-Economic Divides

This imbalance risks reinforcing Sheffield's well-documented spatial social divide.¹⁵ A Local Plan should seek to mitigate such divisions, not entrench them.

Academic research on urban development patterns in the UK confirms the negative outcomes of such unbalanced growth (UK2070 Commission¹⁶ ; Uneven growth: tackling city decline, Joseph Rowntree Foundation¹⁷)

The plan's imbalance appears to be the direct result of a flawed site selection process.

4.0 Specific Objection: The Proposed Allocation of Sites SES29 and SES30

4.1 Identification of Sites

- **Site SES30:** Land between Bramley Lane and Beaver Hill Road, Handsworth. This site is allocated for an estimated **868 homes**.¹
- **Site SES29:** Land at Handsworth Hall Farm, located off Finchwell Road. This site is allocated for an estimated **870 homes**, potentially as part of a wider mixed-use development that also includes employment land and a new secondary school.¹

The development of these two sites alone would represent one of the largest single incursions into the Green Belt in Sheffield's history and would fundamentally and permanently alter the character of our communities.¹⁸ Evidence shows that the Council assessed at least 24 potential Green Belt sites in the affluent west of the city (in postcodes S10, S11, and S17) but that all of them were dismissed and "not shortlisted".¹⁴

In their response to plan examination in February 2025, inspectors suggested that the council's approach, focusing on large strategic sites:

"...should be expanded to include smaller site options on greenfield land in the Green Belt, on the grounds that this is a reasonable alternative strategy and should therefore be subject to appraisal (as set out in EXAM 61). This work has yet to be completed and it is feasible that it could identify further sites without fundamental constraints." ⁸

This alternative strategy has clearly not been considered.

The official justification provided for the sites selected —a combination of "sustainability appraisal, impact on green belt purposes, planning appraisal and availability information" is vague and lacks transparency and consistency.¹⁴ For example, site S01265 is assessed as having a fundamental constraint because it is currently used by a cricket club¹⁹, but there is no acknowledgement that SES29 and SES30 are used regularly both by the local running club and a significant number of local residents for walking. Sites GBOM11, GBOM13 and S03069 are rejected because they are local green spaces and because of the difficulty of access down a narrow road¹⁹, whereas the equal local green space value of SES29 and SES30 is ignored, and similar difficulty of access to SES29 is dealt with in mitigation by a vague allusion to the need for improvement of the local road network.¹⁹

4.2 The Failure to Assess Cumulative Impact on Established Communities

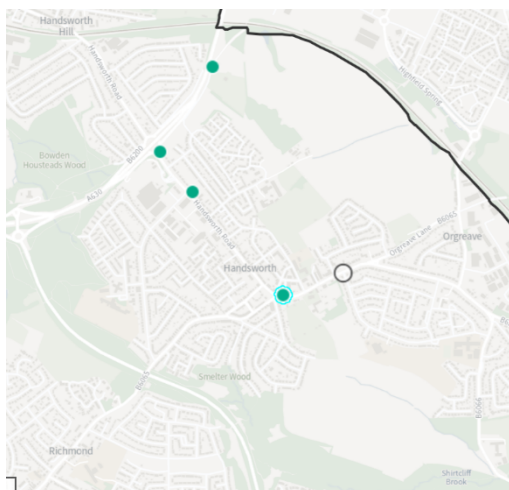
A critical failure of the draft plan is its inability to assess the *cumulative* effect of concentrating multiple large-scale developments in a single community. The combination of the proposed greenbelt development, housing development already allocated in the draft plan, and the impact of the large and still expanding neighbouring Waverley development in Rotherham, risks creating a cascading system of failure.

4.3 Traffic Congestion

The proposed development will increase traffic congestion, incurring economic and social costs. Nationally, congestion is estimated to cost the UK economy over £30 billion per year, which equates to an average of nearly £1,000 for every driver in wasted time and fuel.²⁰ Residents have consistently raised the alarm that the existing road network is at capacity and cannot cope with thousands of additional vehicle movements per day.¹⁸ Access issues are particularly acute for site SES30 (Bramley Lane), with proposed access through a small estate which already operates a one-way system. The only detailed proposed mitigations are to the strategic road network. There are no proposed local road network mitigations for SES29 and the mitigations for SES30 are vague.

4.4 Air Quality

Data from Sheffield City Council diffusion tubes adjacent to SES29 and SES30 shows that levels of Nitrogen Dioxide (NO₂) in 2023 exceeded the WHO safe annual average of 10 µg per m³ at every site where data was collected.²¹ This will only increase given the proposed development.



Diffusion Tubes

Site	Handsworth Rd/Richmond Rd Bus Stop
Further Information	Darnall
Pollutant	Nitrogen Dioxide
Tube Group	Community
Tube Number	427
Pollutant levels ($\mu\text{g}/\text{m}^3$) in 2023	27

Diffusion Tubes

Site	163 Handsworth Road
Further Information	Handsworth and Darnall
Pollutant	Nitrogen Dioxide
Tube Group	Community
Tube Number	404
Pollutant levels ($\mu\text{g}/\text{m}^3$) in 2023	32

NO₂ and fine Particulate Matter (PM_{2.5}), are scientifically linked to a range of serious health conditions, including the development and exacerbation of asthma, chronic obstructive pulmonary disease (COPD), and cardiovascular disease.²²

Our ward, as a socio-economically disadvantaged neighbourhood, is disproportionately exposed to poor air quality.²³ The concentration of development will create new pollution hotspots, disproportionately harming the health of the very communities the plan should be protecting. Children are particularly vulnerable; a comprehensive meta-analysis confirmed a statistically significant association between exposure to traffic-related air pollution (TRAP) and the development of asthma in childhood.²⁴ "Dieselgate" highlighted that real-world vehicle emissions are higher than results from official laboratory tests, meaning the public health impact will be worse than models predict.²⁵

4.5 Strain on Local Services and Infrastructure

An entirely valid concern from residents is the pressure the proposed development of greenbelt will place on already stretched local services.²⁶ Residents report that local schools and medical centres are oversubscribed.¹² The Royal College of General Practitioners has issued a clear warning that as communities expand, it is essential that local services grow to meet demand.²⁷ The proposed mitigation for SES29 and 30, expanding existing GP and dental practices, is not clearly demonstrated to be either sufficient or achievable in practice.

We also face permanent loss of accessible public green space providing regularly used opportunities for exercise, recreation, and stress relief.²⁷ Studies have shown that newer housing developments have, on average, 40% less green space than those built in previous decades, and that a lack of access to such spaces is directly linked to poorer health outcomes and lower life expectancy.²⁷

Overall, in our ward these proposals risk precipitating a cascading system failure. A plan that creates such a negative cycle cannot be considered effective or sustainable.

4.6 Loss of Irreplaceable Community Amenity

This land is not of low value. It is a cherished and heavily used natural, "lungs" for the communities of Woodhouse and Handsworth.¹⁸ Residents describe it as a literal life saver in terms of mental health, and a key reason for choosing to raise families here.²⁸ It is a vital space for maintaining physical and mental health for residents who cannot afford to travel further afield to get these benefits. It provides a crucial natural buffer that separates established communities from the encroaching urban sprawl and the polluting regional road network.¹⁸

4.7 Significant Ecological Harm

The development of these specific sites would cause severe, demonstrable, and irreversible harm to biodiversity and the natural environment. This has been confirmed by expert bodies.

The Sheffield & Rotherham Wildlife Trust objects to the development of SES29 and SES30 on the grounds that it would irreversibly harm biodiversity, make residents more nature deprived and threaten the health of the adjacent wildlife sites and ancient woodland. The proposed 15m buffer is insufficient to mitigate these harms. The trust states:

“The Environment Act 2021 and the NPPF (paragraph 180) provide clear protection for irreplaceable habitats. Natural England and Forestry commission standing advice on projecting Ancient Woodland, Ancient and Veteran Trees from development “is at least 15m but 50m is preferable”. A minimum 50m buffer is now widely recommended as best practice as a safeguard especially for significant developments near Ancient Woodland.”²⁹

Local conservationists and residents have documented that the sites are home to legally protected species such as bats and owls, alongside a thriving population of deer, badgers, foxes, kestrels, buzzards, and numerous other bird species.¹⁸ These sites are also being proposed for release before the developers can produce even Preliminary Ecological Assessments.

4.8 Flood risk

Sheffield’s main level 2 flood risk assessment identifies that there is not sufficient data to provide an accurate sequential flood risk assessment for these sites.³⁰ The level 2 flood risk assessment for SES29 suggests woodland planting along the existing watercourse as mitigation, accepting that development of this site will increase flood risks.³¹ I could not find an equivalent document for the SES30 site, but the stream running through the site flows into the bordering level 2 and 3 flood risk site along the brook running through Shirtcliff Wood. Beaver Hill Road already floods regularly, to a depth that prevents traffic, including buses, using the road (see the image below from Yorkshire Live, November 2024).



5.0 Flawed Consultation Process

The original local plan public consultations in 2023 did not clearly explain the constraints of the process and the need to focus objections on soundness and legality, with the result that residents felt it was a sham consultation.³²

Consultations for the additional site allocations has been better focused as a result of feedback, but have still been heavily criticised by residents for being "grossly unfair" because of the short time scale in which to raise objections, given the need to understand a complex planning process and identify evidence¹⁸ The sheer scale of the Handsworth proposals, particularly the site off Bramley Lane, was not part of earlier public consultations, meaning residents have been denied a proper opportunity to engage in the plan-making process from the beginning. This runs contrary to the principles of open and collaborative planning encouraged by the NPPF and has understandably led to a deep sense of mistrust and disenfranchisement within the community.¹⁸

6.0 Formal Proposals for a Sound and Equitable Plan

6.1 The Path to a Sound Plan

An amendment to the plan that is based on a flawed and opaque site selection and consultation process for green belt release, and which proposes development that will cause unmitigated harm to communities cannot be considered sound. We formally propose that the Inspectorate recommend two critical and substantive modifications to the plan, to ensure that it is delivered in a manner that is fair, sustainable, and genuinely plan-led.

6.2 Proposal 1: Remove Sites SES29 and SES30

For all the reasons outlined in detail in Sections 4.0 and 5.0 of this submission, the social, environmental, and infrastructural harm that would be caused by the development of sites SES29 and SES30 would be severe, cumulative, and irreversible. These two sites must be removed from the schedule of allocations.

6.3 Proposal 2: A Rebalancing of Green Belt Allocations

The housing need identified by the Inspectorate is accepted and must be met. However, it must be met in a way that is equitable and sustainable. We therefore propose a comprehensive re-evaluation and rebalancing of the additional Green Belt site allocations.

A crucial component of this rebalancing must include the formal and transparent reconsideration of the numerous potential development sites in the west of Sheffield that were assessed by the Council but summarily dismissed¹⁴ This list includes:

- **12 sites** in the S17 postcode area (covering Dore, Totley, and Bradway)
- **7 sites** in the S11 postcode area (covering Ecclesall)
- **5 sites** in the S10 postcode area (covering Fulwood and Lodge Moor)

A sound plan-making process requires a transparent and robust comparison of all reasonable alternatives. We propose that this list of 24 sites be publicly released and subjected to a new, transparent assessment as part of a revised "Selection of Sites for Green Belt Release" process. This would allow for a genuine city-wide discussion about where best to locate new homes. This is not a request for preferential treatment, but a

demand for a fair and accountable process. The table below presents this proposal in a clear, actionable format for the Inspectorate's consideration.

Table 2: Illustrative Alternative Green Belt Areas in West Sheffield for Re-evaluation

Postcode Area	General Location	Number of Sites Previously Assessed but Not Shortlisted	Justification for Re-evaluation
S17	Dore, Totley, Bradway	12	To be re-evaluated as part of a comprehensive review to achieve a more balanced, equitable, and sound spatial strategy for housing growth. Ensures all reasonable alternatives are properly and transparently considered as required by the National Planning Policy Framework.
S11	Ecclesall	7	To be re-evaluated as part of a comprehensive review to achieve a more balanced, equitable, and sound spatial strategy for housing growth. Ensures all reasonable alternatives are properly and transparently considered as required by the National Planning Policy Framework.
S10	Fulwood, Lodge Moor	5	To be re-evaluated as part of a comprehensive review to achieve a more balanced, equitable, and sound spatial strategy for housing growth. Ensures all reasonable alternatives are properly and transparently considered as required by the National Planning Policy Framework.

Source: Compiled from media reports citing council sources.¹³

This proposal offers a constructive solution, demonstrating a commitment to finding a workable solution to the city's housing needs.

Key conditions on development

We have argued that proposed sites SES29 and SES30 should be retained in Green Belt. However, should the inspectorate decide these sites should be released, then we propose the following additional conditions on development.

SES29

- Retention of all ancient trees and hedgerows, with a detailed, independent ecological assessment that provides a robust plan for their long-term preservation and protection of their role as wildlife corridors.
- A robust biodiversity net gain plan based on current and site survey based ecological assessments.
- A minimum 50m buffer between the development and local wildlife sites, as now widely recommended as best practice as a safeguard, especially for significant developments near Ancient Woodland (Environment Act 2021, NPPF paragraph 180).
- Retention of all walking routes to local schools.
- No development without confirmation that the proposed tram-train link and station will be constructed, as without this the impact on traffic congestion and air quality would be very harmful. The site is already assessed to be close to an air quality exceedance area.
- A masterplan for the site to be developed using a co-operative citizen-based planning approach.
- The inclusion of cycling infrastructure.
- Maximisation of the number of new homes for social rent.

SES30

- A masterplan for the site to be developed using a co-operative citizen-based planning approach, including specific proposals to meet residents' requests for wildlife rich community spaces accessible to the community in perpetuity.
- Retention of all walking routes to local schools.
- A robust biodiversity net gain plan based on current and site survey based ecological assessments, including evidence-based plans for the preservation of hedgerows and watercourses as effective wildlife corridors.
- A minimum 50m buffer between the development and the adjoining ancient woodland, as now widely recommended as best practice as a safeguard, especially for significant developments near Ancient Woodland (Environment Act 2021, NPPF paragraph 180).
- The inclusion of biodiverse open spaces for the proposed school, to serve as outdoor classrooms.
- The inclusion of cycling infrastructure.
- Maximisation of the number of new homes for social rent.

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