



Sheffield Plan Examination

Inspectors – Katie Child B.Sc. (Hons) MA MRTPI, Rosie Morgan B.Sc. (Hons) MCD MRTPI, and David Troy B.Sc. (Hons) MA MRTPI

Programme Officer – Ian Kemp, tel. 0772 3009166

Email: ian@localplanservices.co.uk Address: PO Box 241, Droitwich, Worcestershire WR9 1DW

Inspector's reply to the Council re Post Main Modifications Note

27 July 2026

1. Our reply to the Council's response to the Inspector's Post Main Modifications Note (EXAM 217) is set out below. We apologise for the delay in responding. This was due to a combination of prior work commitments and annual leave. Our reply and the Council's response to EXAM 217 should be placed in the examination library.
2. We have dealt with the Council's specific queries in turn below, under sections 3, 4, 5, 6, 9 and 10.
3. The 'further matters' section at the end of this note relates to further queries raised in emails from the Inspectors to the Council dated 5th and 17th June 2026 and the Council's response dated 8th July 2026. The Council is requested to publish these emails in the examination library alongside EXAM 217.

Section 3 - Appraisal of sites put forward during consultation on the additional Green Belt sites in May 2025

4. The Council has confirmed that 6 potential non-Green Belt (urban) site options, in addition to 4 Green Belt site options, were formally put forward by developers/landowners during the Green Belt site consultation in May 2025.
5. The Inspectors have not specified that a second set of additional allocations should be identified in the plan (further to the proposed additional sites put forward during the May 2025 consultation). It is also appreciated that non-Green Belt site options may potentially come forward as windfall development and the Council has included a sizable windfall

allowance in the housing supply workings. However, where reasonable alternative site options are formally put forward by landowners/ developers, it is common to undertake Sustainability Appraisal (SA) and site assessment in order to provide a clear evidence base. Paragraph 141 in the NPPF 2023 also refers to the need to examine all reasonable options when justifying the need for Green Belt releases and to maximise the use of previously developed land.

6. It is therefore our view that the Council should consider Sustainability Appraisal and site assessment work for the 6 non-Green Belt site options as well as the 4 Green Belt ones (which have already been completed). This would build on the site suitability and deliverability summary information provided in EXAM 217.

Section 4 - Boundary of allocation sites NWS30 and SES29 (Yorkshire Water)

7. In relation to NWS30 the amended site area should be included in a further main modifications schedule and the amended site boundary published in a document setting out further changes to the Policies Map. However, the site area change is small and we do not consider that it is necessary to adjust the site capacity by one unit. The site capacity estimates are approximate and there is scope on a site of this size to achieve the original capacity figure with small adjustments in density/design.
8. In relation to SES29 the amended site boundary should be published in a further changes to the Policies Map document.

Section 5 – Boundary of site NES38 (access road)

9. The amended site area should be included in a further main modifications schedule and the amended site boundary published in a document setting out further changes to the Policies Map. As with site NWS30, if the change in site area and estimated capacity is small then there may not be a need to alter the capacity.

Section 6 – Application to secure Listed Building Status for the bridge adjoining site SES29

10. The Council's response to part c) in paragraph 6.1 refers to new evidence which indicates that site SES29 is potentially capable of being accessed via Orgreave Lane only. The Council is requested to place the new evidence in the examination library and to allow consultation on the document(s).

Section 9 – Policy GS5 Biodiversity

11. The suggested revision to Policy GS5 would allow site specific factors to be taken into account when considering the level of protection to be given to Priority Habitats and Species. However, for the avoidance of doubt and to make the policy effective, the suggested additional sentence should be revised to clarify that it applies to priority habitats/species where they are found outside of international or nationally designated sites. The change to Policy GS5 would need to be published as a further main modification and subject to consultation.

Section 10 – Policy BG1 Blue and green infrastructure

12. The Council's proposed revision to the fourth bullet point of Policy BG1 provides helpful clarification on the approach to enhancing habitat connectivity, which would make a positive contribution to nature recovery. However, the justification for affording 'very significant weight' to the protection and enhancement of connecting spaces is lacking, particularly as the Local Nature Recovery Strategy (LNRS) has not yet been finalised, and the scale and nature of such areas is currently uncertain. The suggested text should instead be incorporated as a separate, standalone paragraph, with appropriate revisions so it makes sense.
13. In addition, further consideration should be given as to whether it is appropriate to include specific reference to 'Areas that Could Become of Particular Importance for Biodiversity' at this stage, given the draft status of the LNRS and the potential for change.
14. The new standalone paragraph could be worded as follows: *Where possible, opportunities to maintain or enhance connectivity between designated ecological sites should be taken, with a particular focus on areas identified as having importance for biodiversity in the Local Nature Recovery Strategy. This could be achieved through the protection or creation of green and blue spaces, as appropriate.*
15. The above text should appear after the bulleted list, which should end after 'historic parks and gardens'.
16. The Council has also suggested that the third paragraph of the published policy should be amended to clarify that development affecting Urban Greenspace Zones, Green Belt, Local Green Spaces etc should be assessed against (rather than comply with) the relevant policies listed. We concur that this change would improve the effectiveness of the policy.

17. We note the clarification that the final (fourth) paragraph of the policy is intended to primarily apply to designated wildlife sites. For effectiveness purposes, the policy should be amended to make this clear, through the addition of the words 'on designated wildlife sites' after 'human access'.
18. The above changes to Policy BG1 should be published as a further main modification and consulted on.

FURTHER MATTERS

Agricultural land classification

19. Our attention has been drawn (by representation 5.0467 and others) to the recent publication of the DEFRA predictive agricultural land classification map (October 2025) which reappraises land and breaks down the Grade 3 land classification. The evidence has emerged at a late stage in the examination process and we are cognisant that the Council has already undertaken a significant amount of site assessment work. However, the examination is not yet complete and the new evidence appears to be relevant to the appraisal of site options which are agricultural land. Footnote 58 in the NPPF 2023 states that where significant development of agricultural land is demonstrated to be necessary, sites of poorer quality should be preferred to those of a higher quality. The Sheffield Plan as proposed to be modified includes a significant amount of housing and employment development on agricultural land (mainly on sites in the Green Belt but not exclusively so).
20. The Council is therefore requested to undertake further SA/site assessment work on site options on agricultural land, taking account of the new DEFRA mapping evidence. This will involve revisiting the SA/suitability indicator relating to 'loss of best and most versatile agricultural land' for allocation sites and reasonable alternative site options. SA work on strategic Green Belt locations in the Council's Integrated Impact Assessment may also need to be revisited (under the category of 'soils and land').
21. As part of this work the Council is also requested to:
 - clarify what effect the findings have on the site selection work and whether areas of poorer land quality have been selected; and
 - if areas of poorer quality are not selected, explain why this approach is justified and what other factors weigh in favour of the proposed allocations.
22. Conditions requiring agricultural land surveys have been omitted/removed from site allocation policies on the basis that these matters have been

addressed through the site assessment/selection process. The Council has highlighted that site policies for NWS31 and SES10 still refer to agricultural land classification in the development conditions in error. The Council may need to reflect on the results of the further agricultural land classification SA/site assessment work outlined above. However, if it is determined that the omission/deletion of agricultural land classification conditions is justified, then the conditions should be removed from NWS31 and SES10 for consistency. This would be via further main modifications to the plan that would need to be published for consultation.

Status of site SES13

23. The Council has confirmed that site SES13 was formerly a school playing field. This is key new information which the Council should explore in the context of paragraph 99 in the NPPF 2023. Elsewhere in the plan, development conditions have been used to secure replacement sports facilities or upgrades to existing facilities where former school playing fields are proposed to be redeveloped for housing and there is a shortfall of open space/sports facilities in the local area. If further changes are proposed to Policy SES13, it will be necessary to undertake consultation on new main modifications (and publish new background evidence on the status of SES13 and SA/site technical work in the examination library).
24. The Council is requested to confirm its position on SES13 and how it wishes to take this matter forward.

Condition on site CH04

25. The Council has confirmed that the access road to CH04 has been widened and released from the Green Belt, but will directly affect a Local Wildlife Site and is within an Urban Greenspace Zone. We concur that further modifications will be necessary to the condition on site CH04 to clarify this position, for reasons of effectiveness.

Wildlife buffers on site SS19

26. The issue of buffers for site SS19 was discussed at the hearing session. Having reflected on this matter further, taking account of the varying habitats along the brook and the approach taken for other Green Belt sites, we agree that the Council's suggested revised buffer condition for SS19 should be published as a further main modification and consulted on.

Affordable housing supply

27. The Council has confirmed that the total capacity for sites NES37, SES30 and SWS19 is incorrectly recorded in EXAM 187 and therefore the estimated affordable housing supply from these sites is incorrect. On this basis we concur that the overall affordable housing target figure of 5,531 in MM221 would need to be amended via a further main modification, in order to capture these changes.
28. In the meantime the Council is requested to confirm the correct total site capacity figure and revised baseline affordable housing figure (without policy plus) from each of these 3 sites and how this has changed from EXAM 187.

Site SES30 and the Quaker preaching ground

29. The Council has confirmed that an application to list an adjoining Quaker burial ground and nearby preaching site has been turned down by Historic England, and that the Council has accepted that the burial ground should be included on a local list. However, it would be appreciated if the Council could confirm the location of the preaching ground, whether it extends into site SES30 and/or has implications for access to SES30. The Council is also requested to confirm whether an application for the preaching ground to be included on the local list has been made to the Council and refused? If so, what reasons were given?

CONCLUSIONS

30. A number of actions and further consultation requirements are outlined above. In summary, this includes:

Further SA/site assessment work on:

- The 6 non-Green Belt site options proposed by developers/landowners during May 2025 consultation (section 3 above)
- Agricultural land classification for all relevant site options, taking account of new DEFRA mapping (including justification for Council's approach and selected allocations).

Further potential main modifications

- Sites NWS30 – site area changes (section 4)
- Site NES38 – site area changes (section 5)
- Policy GS5 – wording changes (section 9)
- Policy BG1 – wording changes (section 10)
- Sites NWS31 and SES10 – consider whether agricultural land survey conditions should be deleted

- Site CH04 – wording changes
- Site SS19 – wording changes
- Affordable housing supply – changes to target in MM221
- Site SES13 – confirm Council view on potential wording changes.

Further potential changes to the Policies Map

- Sites NWS30 and SES29 – site boundary revisions (section 4)
- Site NES38 – site boundary revisions (section 5)

Other further work/actions

- Publish new access evidence relating to SES29 (section 6)
- Provide breakdown of affordable housing changes for sites NES37, SES30 and SWS19.
- Further information on SES30 and the Quaker preaching ground.

31. Further actions and potential main modifications are also identified in the Inspector's Post Main Modification Note (EXAM 217) in relation to the Innovation Corridor road scheme, and in the Note to the Council dated 16th July on early review policies.
32. Any new main modifications will also need to be subject to further SA/HRA work as necessary.
33. The SA work and schedule of further proposed main modifications would be subject to a minimum 6 week period of consultation. Further changes to the Policies Map would need to be published alongside the Main Modifications schedule.
34. The Council is requested to liaise with the Inspectors (via the PO) on potential timelines and next steps.

Katie Child, David Troy and Rosie Morgan
INSPECTORS

Inspector Message to SCC – 5th June 2026

Message to the Council re Post Main Modifications additional questions/requests

Further to the Inspectors Post Main Modifications Note sent to you today for your consideration.

Please could you respond to the additional questions/requests set out below and let us know via the Programme Officer when to expect your response:

1. **Representations relating to the Council's Integrated Impact Assessment work**

- 1.1 A number of representations (including 5.0371) have questioned whether the Council's Integrated Impact Assessment (IIA) work fully assesses cumulative effects of growth linked to the additional allocation sites. The representations refer to the second sentence on page 120 in the IIA Modifications Report Addendum Modifications Consultation (Feb. 2026) to support this position: '*Additional site allocations are likely to have cumulative effects on the IIA findings that need to be explored further.*' The Council is requested to clarify the meaning of the statement and confirm its position on the matter.
- 1.2 Representation 5.0188 highlights a number of concerns regarding the legality of the Council's approach in the Integrated Impact Assessment 2025 (EXAM 128b). This includes the justification for an initial sift of sites (section 3.1 of the representation), an absence of comparative assessment and reasons for rejecting sites (section 3.2), the legality of undertaking separate SA of different parts of an allocation site (section 4.1-4.3), and whether the sequential test has been met (section 5). The Council is requested to set out a response to the substantive points made in the representation. In relation to the issue of initial sifting (section 3.1) can the Council clarify details of the distance threshold and whether the 'initial sift' was undertaken as part of the site assessment/selection process (its not referred to in the methodology in EXAM 130) or as part of the SA process in the IIA 2025 (e.g. against a wider number of Green Belt site options than in EXAM 130).
- 1.3 Representors (including 5.0384) have queried how the Level 2 Strategic Flood Risk Assessments (SFRA) on additional sites and further work on ecology and archaeology on the additional sites (by site promoters) has been fed into the IIA work. The Level 2 SFRA matter was discussed at the hearings. The Council indicated that draft results were obtained in April 2025 and therefore the flood information was taken into account in the site appraisal/SA work in EXAM 130. It also appears that the general strategy testing, incorporating the Level 2 SFRA results, has been updated in the IIA 2026. Nevertheless, the Council is requested to confirm its position on this matter. The Council is also requested to respond to the points made regarding the further work on ecology and archaeology.

2. Agricultural land classification

- 2.1 A number of representations have raised concerns about the process of assessing and taking account of agricultural land value in the Council's SA and site selection work on the additional allocation sites (including 5.0467).
- 2.2 The representations highlight the recent publication of the DEFRA predictive agricultural land classification map which breaks down the Grade 3 land classification. The representations also dispute agricultural land classification scores of the strategic locations in the IIA and question how agricultural land value was taken into account in the selection of the allocation sites in the Green Belt. The Council is requested to provide a response to the representations and clarify how the site assessment and site selection process is justified and proportionate in the context of footnote 58 in the NPPF 2023.

3. New objections to site SES13

- 3.1 A number of representations have been submitted on SES13 (including 5.0042, 4668798 and 5.0100) citing concerns about the loss of open space and other matters. The Council is requested to provide a response to the points raised in these representations. This should include the status of the current site and whether it comprises a formal park (there is reference in one of the responses to a Council plaque on the site).

4. Farming business adjacent to site NES36

- 4.1 A number of representations have been submitted on NES36 (including 5.0324 and 5.00338) which raise concerns about the impact of the development on the operation of the adjoining farming business (on land that was previously identified within the allocation site). The Council is requested to provide a response to the points raised in these representations and clarify your views on this matter.

5. Condition on site CH04

- 5.1 Representations from Rula Developments (5.0478) indicate there is an error in the 6th condition in the policy, as it fails to refer to the use of Green Belt land outside the allocation site for the access road and ground remediation works (as set out in EXAM 191).
- 5.2 However, is any further Green Belt land outside the site needed for the access road, given that the site boundary around the entrance point has now been widened in the Proposed Changes to the Policies Map document (February 2026)? If this is not the case, does the proposed condition need to be amended to refer to the access road within the LWS and Urban Greenspace Zone (UGZ) only and the need for ground remediation, including engineering works and remodelling works, within the LWS, UGZ and Green Belt, in order to deliver employment development on the site?

- 5.3 The Council is requested to confirm its position and clarify how this matter should be resolved.

6. Deletion of site LR6

- 6.1 The Council has put forward a modification to delete site LR06 on the grounds of flood risk, following publication of the Council's Level 2 SFRA. Representation 5.0069 objects to the deletion, citing concerns that the Lower Don Valley flood alleviation scheme has not been taken into account in the Council's SFRA work and highlighting that planning permission was obtained in 2021 for flats on the site.
- 6.2 The Council is requested to provide a response to the representation. This should clarify whether the modelling work takes account of the flood alleviation schemes in the Lower Don Valley, and if not explain the Council's approach and why the proposed deletion is justified. The Council is also requested to confirm the status of the planning consent from 2021.

7. Wildlife buffers on site SS19

- 7.1 Representation 5.0423 queries the proposed modification in the site policy that requires a minimum 15 metre buffer from the stream, citing the absence of woodland in some sections. Elsewhere in the Plan the Council seeks standard minimum buffers on allocated sites, with the final distance being determined through the planning application process. The Council is requested to respond to this matter and clarify if there are particular circumstances that justify this departure in the case of SS19.

8. Management Plan for Redmires Conduit, site SWS18

- 8.1 Representation 5.0202 suggests that policy conditions should require that site masterplanning provides for management and maintenance of the Redmires Conduit heritage site and Local Wildlife Site (LWS).
- 8.2 The Statement of Common Ground between SCC and the site promoter (EXAM 164) refers to ongoing discussions between Council officers, the site promoter, landowner and Yorkshire Water to ascertain whether a Management Plan for the Conduit could be developed and delivered. Please can you provide an update on any discussions which may have taken place since the hearings, including in terms of whether it would be feasible to deliver a Management Plan. Furthermore, does the Council consider the policy to be unsound in the absence of a specific requirement for a Management Plan?

9. Opportunity Sites

- 9.1 Representation 5.0467 refers to a recent Freedom of Information (FOI) request to ascertain what work the Council has done to determine if the Opportunity Sites are available. If this FOI evidence has been

published and/or is available, the Council is requested to forward us a copy and add it to the examination library.

10. Provision of community facilities on strategic allocation sites

- 10.1 Representation 5.0463 questions why community facilities are not sought on sites SES29 and SES30 given that they are treated by the Council as one strategic location. Reference is made to the Council's SPD on CIL and Planning Obligations and the IIA (February 2026) which specify that community facilities should be provided on strategic sites of 1000+ dwellings. The Council is requested to set out its response to this representation.

11. Existing greenspace on site SES30

- 11.1 At the hearing the Council indicated that part of the accessible natural greenspace on SO2502 may be needed to facilitate site access, but there is scope to retain most of the area. This is shown on the concept plan in EXAM 168. Representation 5.0463 has queried why the site policy does not refer to mitigation measures relating to replacement provision or clarify the Council's approach to the area. The Council is requested to provide a response to this representation.

12. Affordable housing supply

- 12.1 Representation 5.0463 questions the Council's affordable housing supply figure of 5,531 over the Plan period, as set out in EXAM 187, citing concerns about the 'policy plus' approach on sites NES37 and SES30 and questioning the ability to secure funding from Homes England. The representation also highlights errors in the total capacity figures for NES37 and SES30 that could have implications for the estimated affordable housing figures.
- 12.2 The Council is requested to provide a response to the representation and clarify whether the figure of 5,531 affordable homes should be adjusted. If so, this could have implications for the published affordable housing target figure in the monitoring framework in MM221.

13. Policy NC3 Affordable Housing

- 13.1 A number of representations on the proposed main modifications object to the percentage of affordable housing being linked to Gross Internal Floor Area (GIFA) rather than units (including 4619529, 4690585 5.0425 and HBF). This is notwithstanding that the GIFA approach is set out in submitted Policy NC3 and was covered in the Inspector's Main Issues and Questions (and is covered in the Council's SPD on CIL and developer Contributions). Section 19.6 in the Council's hearing statement (WS19/1) deals with this matter.

13.2 The Council is requested to respond to the various points raised in the representations, including in terms of the practicalities of how the policy will operate.

14. **Policy BG1 Blue and green infrastructure (new wording in third paragraph)**

14.1 The Council is requested to confirm the reason for the new paragraph in Policy BG1 which states: '*Development affecting Urban Greenspace Zones, Green Belt, Local Green Spaces, greenspaces, outdoor recreational facilities or designated ecological or geological sites should comply with policies SA5, SA6, GS1, GS1A, GS2, GS5 and GS8.*' Are all of the listed policies relevant to all of the listed types of green infrastructure? For example, the policy would require non-Green Belt sites to comply with Policy GS2 on Green Belt and non-recreation sites to comply with Policy GS1A on sports provision. Also, would it be more accurate, and therefore clear and unambiguous to decision-makers, to require schemes to be assessed against relevant policies, rather than 'comply with'?

Katie Child
David Troy
Rosie Morgan
Inspectors

Inspector Message to SCC – 17th June 2026

Message to the Council re further question on SES30

We have an additional question relating to site SES30, further to our email of additional questions/requests dated 5th June. Could you please deal with the following question as number 15.

It is our understanding that the Quaker burial ground and the Quaker meeting ground at Cinder Hill Green (as referred to in representations) are on land adjoining site SES30. Can you please confirm whether this is the case, or whether part of these areas extends into SES30? If so, are there any implications for site delivery/access of SES30? It would also be appreciated if you could provide an update on their status, e.g. whether the Council has added them to the list of local heritage assets, and progress with any applications to Historic England for listing.

Council Response to the Email Queries – 8th July 2026

1 Representations relating to the Council's Integrated Impact Assessment work

1.1 A number of representations (including 5.0371) have questioned whether the Council's Integrated Impact Assessment (IIA) work fully assesses cumulative effects of growth linked to the additional allocation sites. The representations refer to the second sentence on page 120 in the IIA Modifications Report Addendum Modifications Consultation (Feb. 2026) to support this position: 'Additional site allocations are likely to have cumulative effects on the IIA findings that need to be explored further.' The Council is requested to clarify the meaning of the statement and confirm its position on the matter.

Consideration of Cumulative impacts

The cumulative impacts of the Plan, including the proposed Main Modifications, have been fully considered. The sentence referred to on page 120 in the IIA Modifications Report Addendum Modifications Consultation (Feb. 2026) is taken from Appendix A of the report which outlines the **screening** of the Main Modifications that was undertaken in advance of the further IIA work being undertaken. Detailed consideration of impacts followed as part of the substantive work within that report.

The main body of the report (pages 1 to 42 of the document) is where the cumulative impacts are set out (i.e. following the screening exercise).

1.2 Representation 5.0188 highlights a number of concerns regarding the legality of the Council's approach in the Integrated Impact Assessment 2025 (EXAM 128b). This includes the justification for an initial sift of sites (section 3.1 of the representation), an absence of comparative assessment and reasons for rejecting sites (section 3.2), the legality of undertaking separate SA of different parts of an allocation site (section 4.1-4.3), and whether the sequential test has been met (section 5). The Council is requested to set out a response to the substantive points made in the representation. In relation to the issue of initial sifting (section 3.1) can the Council clarify details of the distance threshold and whether the 'initial sift' was undertaken as part of the site assessment/selection process (it's not referred to in the methodology in EXAM 130) or as part of the SA process in the IIA 2025 (e.g. against a wider number of Green Belt site options than in EXAM 130).

Initial Sifting of Sites

The representation refers to paragraph 2.3.6 (and 2.3.5) of the 2025 IIA Update and Addendum (EXAM125B) which provides a section of narrative on updates to the IIA

since the previous report was published in 2022 (CD17). It refers to sustainability appraisal of Green Belt sites which was carried out during the Sheffield Plan examination in order to inform strategic level alternatives with respect to a dispersed approach to Green Belt site release in response to discussion at the Stage 1 hearing sessions.

Note that paragraph 2.3.5 within the IIA (Update and Addendum) Version 2 (February 2026) has updated paragraph 2.3.5 & 2.3.6 from the 2025 report to explain more clearly the relationship between the 'sifting' of sites and the expanded strategic alternatives. It reads 'Sustainability appraisal of smaller Green Belt parcels, including promoted sites was undertaken to help inform the further alternatives around dispersed growth. The results were reproduced in the update of the IIA for completeness (Appendix J). It should be noted that an initial sift of sites was undertaken to exclude sites that are not adjoining or close to the edge of the urban area. Given that such sites are not sustainably located, these sites are not regarded by the Council as being reasonable alternatives'

Effectively there were two stages of 'sift' that are relevant to the paragraph in question. As set out in paragraph 9.2.3 of the 2026 IIA update, sites were assessed that had been promoted to the Council through various stages of Plan-making (2019 call for sites, 2020 Regulation 18 consultation and 2023 Regulation 19 consultation). However, all other parcels included within the Green Belt Review (i.e. non-promoted parcels) were also assessed.

Firstly, the Green Belt Review parcels were initially defined through the Green Belt Review (GB02, para 6.8) as extending up to a distance of approximately 400m from the edge of the urban area. They were identified around the edge of the main urban area, Principal Towns and Larger Villages. Three previously developed sites more remote from the urban area were also assessed. This effectively sifted out the majority of sites in remoter, less sustainable locations. Secondly, sites (including promoted sites) were filtered out by making the assumption that those that are 'sustainably located' would be the first port of call (see paragraph 8.1.26 of the 2026 IIA Update). For example, 8.1.26 notes that 'it is assumed that those sites that are closer to public transport hubs (railway stations, tram stops and the core bus network) and other existing infrastructure, and which are relatively unconstrained, would be involved in a dispersed approach rather than those that are not well-connected to the existing urban areas and/or contain a significant constraint.'

With respect to EXAM 130 (Selection of Sites for Green Belt Release Topic Paper – May 2025) sites were not sifted by distance from the urban area.

Comparative Assessments and Reasons for Rejecting Sites

Our response to your question regarding ‘sifting’ of sites above addresses the first element of this point. The representation then goes on to state that the IIA has relied on the outputs of site selection methodology rather than carrying out an independent, Plan-level comparison of reasonable alternatives, and gives no explanation of why rejected sites perform worse.

It is our view that this is a misinterpretation of the role of different elements of the IIA. In terms of sustainability appraisals for individual sites utilised in different parts of the IIA, this has been carried out through the Council’s site selection methodology (initially in CD56). This states clearly (paragraph 3.27, Table 1) that the indicators used in the site selection exercise align with the IIA. They are two inter-related exercises. However, the exercise of considering the relative impacts of different Plan-level spatial reasonable alternatives and the subsequent selection of sites to deliver on the selected approach taken are separate by nature and have been confused by the respondent in our view.

Aggregation

The response notes that elements of the technical evidence underpinning site allocation for site SES30 have been carried out across more than one parcel, then subsequently aggregated, which is unsound. We do not consider that this matter presents a risk to soundness. For example, combining the respective SFRA’s for the two parcels that make up SES30 when considering the allocation simply gives you an overview of the whole site in that context. For instance, the sequential test combines this information to offer a comparison against other sites.

Sequential Test

Our response to the substantive points above around sifting and aggregation of sites for assessment address this point.

Ownership of SES30

The representation challenges the allocation of site SES30 on the basis that there is no evidence provided of independent verification or peer review to ensure that the evidence base informing its allocation is objective. It should be noted that, whilst site SES30 is owned by the Council, as with other sites in a similar position, the Council’s Property Services team were involved as the landowner representative for the purpose of site consideration, and through the examination hearings this role was carried out by the Council’s agent Carter Jonas.

In terms of the evidence base supporting SES30’s allocation, this is reflective of the overall approach to evidence gathering at this stage in the Plan’s examination.

Effectively, the site's allocation was supported by the same elements of the evidence base as every other site – whether Council or privately owned. For example, the Heritage Impact Assessment was carried out in-house for all relevant sites, and the SFRA was carried out externally by JBA Consulting for all sites. Therefore, the evidence base is objective and subject to public scrutiny to the same extent for each site in our view.

1.3 Representors (including 5.0384) have queried how the Level 2 Strategic Flood Risk Assessments (SFRA) on additional sites and further work on ecology and archaeology on the additional sites (by site promoters) has been fed into the IIA work. The Level 2 SFRA matter was discussed at the hearings. The Council indicated that draft results were obtained in April 2025 and therefore the flood information was taken into account in the site appraisal/SA work in EXAM 130. It also appears that the general strategy testing, incorporating the Level 2 SFRA results, has been updated in the IIA 2026. Nevertheless, the Council is requested to confirm its position on this matter. The Council is also requested to respond to the points made regarding the further work on ecology and archaeology.

Consideration of SFRA and the Sequential Test

All SFRA work (Level 1 SFRA in 2023; Level 2 SFRA (Submitted Plan sites) in 2024 and Level 2 SFRA (Additional Sites) in May 2025) has been fed into, and been considered, within the updated IIA 2026. The relevant SFRA work was also considered in both the site selection process (EXAM130/130A/130B) and in the application of the Sequential and Exception Tests (EXAM151/151A). Further details on these stages are given below.

SFRA as part of the Site Selection

When beginning the site selection for the Proposed Additional Site Allocations, the Level 1 SFRA was used to identify the SA Flood Risk indicator score. The indicator is set out in the Site Selection Methodology (CD56, page 22). The data from the Level 1 SFRA was also used as part of the suitability assessment phase of the methodology to further screen the potential sites against flood risk.

This information, alongside wider findings from the site selection process to this point, were used to identify a shortlist of reasonably available sites that were suitable for the proposed development. These sites were then assessed through the Level 2 SFRA (Additional Sites) work.

Drafts of the SFRA level 2 screening reports for these shortlisted sites were available to officers as part of the final stages of the site selection process. This

helped inform the choice of recommended sites by, for example, feeding into the sequential test and highlighting any site-specific mitigations.

SFRA as part of the IIA

The IIA Update 2026 establishes (paragraph 2.3.7 and section 9.5) that the site-specific evidence identified through the Level 2 SFRAs (alongside the findings of the wider Level 1 SFRA) are considered within the report and that the Level 2 SFRA does not have a material effect on the overall delivery of the spatial strategy. The IIA Update 2026 also includes the results of the Sequential and Exception Tests, in accordance with the requirements set out in the Flood Risk and Coastal Change PPG (Paragraph 007).

In terms of testing the spatial strategy for the Plan, the 'IIA Report Addendum – Modifications Consultation', includes within section 5.11 consideration of the effects of both the submission version of the Plan, and Plan with modifications on the Climate Change Resilience aim. This indicates specific outputs from the SFRA in relation to additional sites and indicates an overall minor negative effect of the Plan with modifications compared with the moderately negative effects of the submission Plan.

Consideration of Ecology and Archaeology

For the consideration of the strategic alternatives, the IIA uses high level mapping of designated ecological sites and heritage assets to determine whether there would be Likely Significant Effects (LSEs). It is not reliant on baseline studies. From an ecology perspective at a site level, the IIA uses the suitability assessment undertaken as part of the site selection process. Those assessments considered a site's potential impact on designated ecological areas.

Some site promoters have chosen to produce preliminary ecological assessments (PEAs) or archaeological studies to support the allocation of their site, but the IIA is not dependent on these. Where PEAs were made available, they were used to inform site specific conditions on development, which, in some cases, were agreed as a result of discussions at the Examination hearings.

For archaeology, the general approach for proposed additional site allocations has been to attach a condition where scoping of potential heritage interest (based on the findings in EXAM127) suggests a heritage statement should be produced at the planning application stage. The representation (5.0384) requests specifically that the IIA appraisal of sites SES29 and SES30 is updated to take account of EXAM127A (archaeology). EXAM 127A is the Heritage Impact Assessment for proposed additional sites, updated to include an archaeology concordance note. All

evidence included within this document was available as part of the site selection process. In the case of archaeology in particular, the concordance note in Appendix 1 highlights and links to the relevant archaeology/heritage assessments for each site for ease of reference. It should be noted that the primary source of archaeology evidence for both sites referred to is the 2015 Archaeological Scoping Study (GB04). The output of these Heritage Impact Assessments (incorporating archaeological assessment) was reflected in the site selection process methodology and site appraisals.

2 Agricultural land classification

- 2.1 A number of representations have raised concerns about the process of assessing and taking account of agricultural land value in the Council's SA and site selection work on the additional allocation sites (including 5.0467).**
- 2.2 The representations highlight the recent publication of the DEFRA predictive agricultural land classification map which breaks down the Grade 3 land classification. The representations also dispute agricultural land classification scores of the strategic locations in the IIA and question how agricultural land value was taken into account in the selection of the allocation sites in the Green Belt. The Council is requested to provide a response to the representations and clarify how the site assessment and site selection process is justified and proportionate in the context of footnote 58 in the NPPF 2023.**

Site Selection

The site selection work carried out for the additional site allocations was undertaken in early 2025 using Natural England's Agricultural Land Classification (ALC) data. At that time, this was the provisional 1:250,000 scale regional ALC maps, where grade 3 land is not subdivided into subgrades 3a and 3b. Only a very small number of land parcels in Sheffield have post-1988 surveys available.

The new 'Predictive' ALC map now replaces the ALC map used during the Sheffield Plan's site selection. A wide range of data sources have been used to underpin the new map, including indicators that allow the subdivision of grade 3 into 3a and 3b, meaning that the extent of BMV can be mapped. Notes provided by DEFRA indicate that around 20% of land has improved by 1 grade. The webpage for the dataset for the Predictive ALC map was created on 12th August 2025 (published 15th October) – after consultation on Proposed Additional Site Allocations for the Sheffield Plan had closed. We understand that the dataset was not available to download and use until later.

Strategic Locations in the IIA

The IIA, Table 7.1, identifies strategic locations with a potential grade 3 agricultural land constraint. Table 7.2 and 7.3 summarise findings for housing and employment locations – many indicate minor negative impact against soils. Appendix F sets out the parameters for identifying significant constraints in the Green Belt. For parameter 6, 'Land' the 'Agricultural land classification (pre-1998)' data is used. The 'threshold for significant constraint' column notes that it is 'not likely to be a significant constraint'.

Reasonableness of Approach

We consider that our approach is appropriate and justified. NPPF footnote 58 states that *'Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality'*.

In selecting sites for Green Belt release, it has been necessary to consider a range of sustainability objectives – the NPPF does not require the use of areas poorer quality agricultural land at the expense of all other objectives. It is one factor in the planning balance and that is how it has been considered through the IIA and site selection process.

The IIA report for the Main Modifications recognises that allocation of new sites will lead to loss of agricultural land and soil functions – this is recorded as a minor negative impact compared to the Submission Plan which recorded moderate positive effects, being largely urban focussed. Table 6.1 takes this further and recommends that given a loss of soil resources is unavoidable to an extent, productive topsoil should be retained/recovered.

Given the above, most notably the publication of new evidence on BMV by Natural England, we would ask the Inspectors to advise on whether they wish us to undertake any further work to help with their considerations.

Please note that in reviewing this issue we see that in Annex A, site NWS31 (Green Belt) and SES10 (non-Green Belt) both still incorrectly have a reference to Agricultural Land Classification within the conditions on development. For consistency with the remaining sites that are agricultural land, following changes to the text of policy GS4 (MM184) we suggest this could be removed through a further main modification(s).

3 New objections to site SES13

3.1 A number of representations have been submitted on SES13 (including 5.0042, 4668798 and 5.0100) citing concerns about the loss of open space and other matters. The Council is requested to provide a response to the points raised in these representations. This should include the status of the current site and whether it comprises a formal park (there is reference in one of the responses to a Council plaque on the site).

The site is shown as wholly part of the 'park/recreation ground' open space category in the Southeast Area Profile of the Sheffield Open Space Assessment (2022) (submission document OS13). During the hearings, as part of work to examine deliverability, we noted (EXAM81L) that the site is included in a draft programme for future disposal to a Housing Association, and the Council's Property Services team indicated that it would be marketed from 2027/28 (or sooner) with a 3 year lead in time and delivery starting in 2030/31.

As part of the further technical due diligence work undertaken recently by the Council's Housing Growth team, records show the site is part of a former school site called 'Frecheville County Junior School'. The area of land on which the former school building was located is now housing, which was completed by 1999 (as shown by aerial photographs). Frecheville Infant school was located nearby to the north of SES13 off Fox Lane (and has since been sold and housing built). It is likely the two schools shared a joint playfield. School records show the Infant school on Fox Lane, opened in 1935 and closed in 1986 ([School records at Sheffield City Archives](#)), but we have been unable to establish when the Junior school closed. We can, however, confirm that the school building site was cleared and sold in 1992. We understand that SES13 included the schools' joint playing fields prior to their closure.

As a result of this site history, SES13 is within the Education Service property holdings within the Council and is not subject to any maintenance agreement with the Parks and Countryside Service. The area of land to the north (Fox Lane Playing Fields, identified as Urban Green Space Zone on the Policies Map) is under a maintenance agreement with the Parks and Countryside Service and is within their property holdings.

The previous open space assessment undertaken as part of the Site Selection Methodology Background Paper (CD56) identified the land as being within an area where there is sufficient open space, and surplus for the current function. However, given the new evidence on the former playing field use, the position on this site would potentially have changed.

We would like to seek your view on how we could deal with this new information with respect to the previous use of the site.

4 Farming business adjacent to site NES36

4.1 A number of representations have been submitted on NES36 (including 5.0324 and 5.00338) which raise concerns about the impact of the development on the operation of the adjoining farming business (on land that was previously identified within the allocation site). The Council is requested to provide a response to the points raised in these representations and clarify your views on this matter.

The representations on the main modifications (including 5.0324 and 5.00338) refer to the potential impact of development on site NES36 on livestock in neighbouring fields. In our view, it is not unusual for development to take place next to pastureland, and we consider that any impacts due to noise and disturbance can be addressed as needed through the site layout and a construction management plan at the appropriate point. The neighbouring farming business would be consulted on any future planning application.

5 Condition on site CH04

- 5.1 Representations from Rula Developments (5.0478) indicate there is an error in the 6th condition in the policy, as it fails to refer to the use of Green Belt land outside the allocation site for the access road and ground remediation works (as set out in EXAM 191).**
- 5.2 However, is any further Green Belt land outside the site needed for the access road, given that the site boundary around the entrance point has now been widened in the Proposed Changes to the Policies Map document (February 2026)? If this is not the case, does the proposed condition need to be amended to refer to the access road within the LWS and Urban Greenspace Zone (UGZ) only and the need for ground remediation, including engineering works and remodelling works, within the LWS, UGZ and Green Belt, in order to deliver employment development on the site?**
- 5.3 The Council is requested to confirm its position and clarify how this matter should be resolved.**

We expect that, in order to achieve comprehensive reclamation of the spoil heap, it will be necessary for works to take place outside the boundary of the proposed allocated site. However, we consider that the land outside the site boundary should remain in the Green Belt and any habitat that is harmed should be restored. Policy GS5, as modified, requires any loss of LWS to be compensated with alternative provision – that requirement is included in the wording of the relevant condition that

was previously agreed with the site promoter (explained in EXAM 191). The agreed revised wording, taken from EXAM 191, is as follows:

“New buildings will only be constructed within the Industrial Zone (the developable area), as identified within the Policies Map but the access road and ground remediation, including engineering works and remodelling, will be required within the Hesley Wood Local Wildlife Site, Urban Green Space Zones and Green Belt in order to deliver employment development on the site. Consequently, at the planning application stage, proposals must demonstrate how any development to be accommodated outside the Industrial Zone will keep unavoidable harm to the Local Wildlife Site to a minimum. Unavoidable harm must be fully compensated for through the provision and safeguarding of replacement habitats of a similar character and quality and be of an equivalent size.”

Regarding the access road, the Green Belt boundary was amended to accommodate the road within the allocation, however delivery of the road will still directly affect the Local Wildlife Site and is within an Urban Green Space Zone. Given this is not the same scenario as the remodelling/regrading (required to deliver a development platform within the allocation) which also involves engineering works within the Green Belt, further modifications to the condition are required to reflect the Statement of Common Ground and make this clear. The following alternative wording for the condition on development is therefore proposed, amending the text agreed in EXAM 191:

“New buildings will only be constructed within the Industrial Zone (the developable area), as identified within the Policies Map. However, in order to deliver employment development within this zone, highway access (off Cowley Hill) will be required through the Hesley Wood Local Wildlife Site and Urban Green Space Zones. In addition, ground remediation and remodelling will also be required within the Local Wildlife Site, Urban Green Space Zones and Green Belt. ~~but the access road and ground remediation, including engineering works and remodelling, will be required within the Hesley Wood Local Wildlife Site, Urban Green Space Zones and Green Belt in order to deliver employment development on the site.~~ Consequently, at the planning application stage, proposals must demonstrate how any development to be accommodated outside the Industrial Zone will keep unavoidable harm to the Local Wildlife Site to a minimum and ensure the openness of the Green Belt is preserved. Unavoidable harm must be fully compensated for through the provision and safeguarding of replacement habitats of a similar character and quality and be of an equivalent size.”

Given the different wording between the condition in the schedule of main modifications and the proposed condition within EXAM 191, and the subsequent further modifications above, we agree that it will be necessary to publicise the change to this condition as a main modification.

6 Deletion of site LR6

- 6.1 The Council has put forward a modification to delete site LR06 on the grounds of flood risk, following publication of the Council's Level 2 SFRA. Representation 5.0069 objects to the deletion, citing concerns that the Lower Don Valley flood alleviation scheme has not been taken into account in the Council's SFRA work and highlighting that planning permission was obtained in 2021 for flats on the site.**
- 6.2 The Council is requested to provide a response to the representation. This should clarify whether the modelling work takes account of the flood alleviation schemes in the Lower Don Valley, and if not explain the Council's approach and why the proposed deletion is justified. The Council is also requested to confirm the status of the planning consent from 2021.**

The representation states that the Level 1 SFRA (2023) does not account for the Lower Don Valley Flood Alleviation Scheme (FAS), and that it is recommended that: “the functional floodplain is updated to account for the FAS in the next update to this Level 1 SFRA”. The Level 2 SFRA (April 2024, EXAM38-42) took account of the FAS model, and also updated the extent of the functional floodplain, as recommended in the Level 1 SFRA. A map of the extents of the various flood models used in the Level 2 SFRA is given in the main report (EXAM38, Fig 4-1) but is replicated below. We have annotated the map to show the approximate location of site LR06, in yellow. It can be seen that the site is situated well upstream of the Lower Don FAS, with the 2012 SCFR model detailing the flood extent in the vicinity of site LR06.

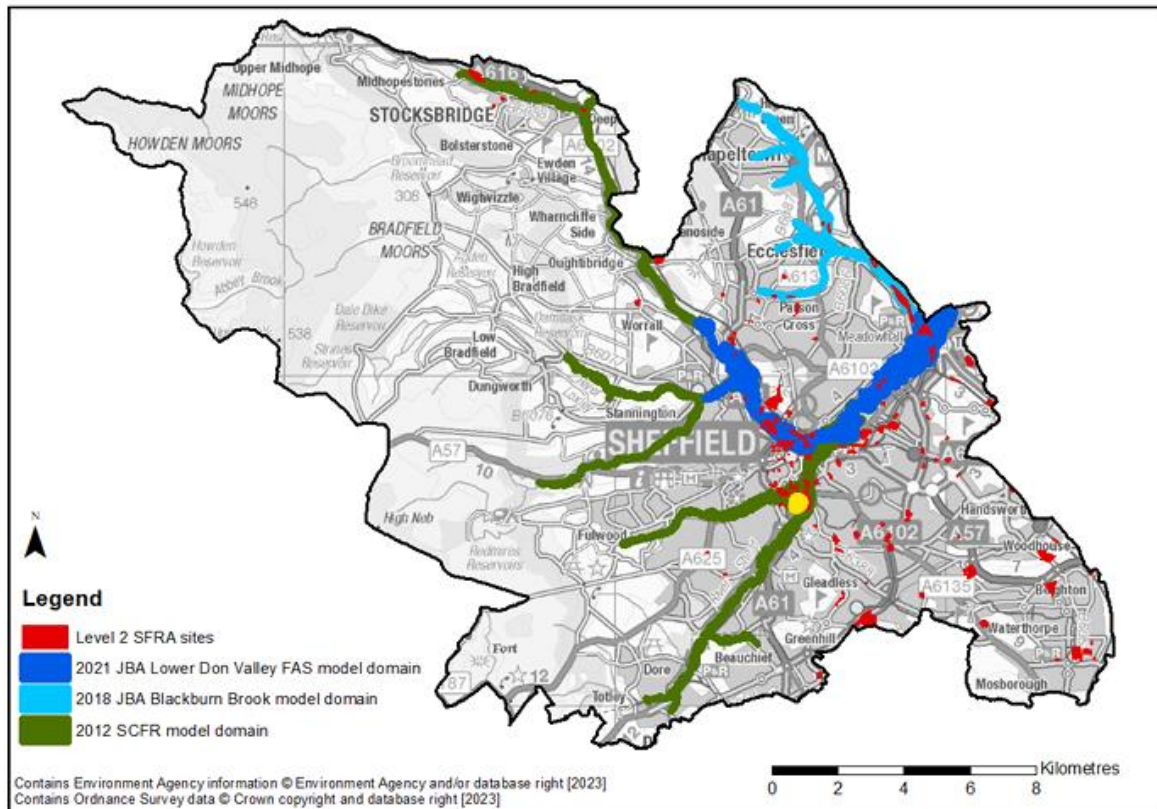


Figure 4-1: EA river model domains

The functional floodplain update showed that the entirety of the developable area of the site is currently indicated as being in Flood Zone 3b, and we therefore considered that the site was not suitable for allocation and proposed that it was de-allocated.

During the Stage 2 hearings (and also noted in the Level 2 SFRA), we noted that an updated flood model was in production, that would supersede the 2012 SCFR model for the River Sheaf and the Porter Brook. This model remains under production and has not yet been approved by the Environment Agency for use for Planning purposes (including for use in defining functional floodplains). The 2012 SCFR model remains the latest approved model for this area of the city and so use in the SFRA (and the resultant recommendation to deallocate the site) remains justified.

As part of this year's annual monitoring process, it has been established that permission granted in 2021 (19/02484/FUL), has not been implemented and has now lapsed. Buildings on the site were demolished as part of a separate application last year.

7 Wildlife buffers on site SS19

7.1 Representation 5.0423 queries the proposed modification in the site policy that requires a minimum 15 metre buffer from the stream, citing the absence of woodland in some sections. Elsewhere in the Plan the Council seeks standard minimum buffers on allocated sites, with the final distance being determined through the planning application process. The Council is requested to respond to this matter and clarify if there are particular circumstances that justify this departure in the case of SS19.

The 15 metre buffer was discussed at the Examination hearings, but we agree that it would be preferable for the buffer distances to be determined through the planning application process. This would also be consistent with the approach on other allocated sites. It allows variations in habitat types along the length of the brook to be considered – we agree that a 15 metre buffer may not be necessary along its entire length. A number of ecological features run along the length of the brook within site SS19 and have different recommended minimum buffer distances:

- minor watercourse (such as the Robin Brook) is 3m
- Ancient or veteran trees - 15 times larger than the diameter of the tree trunk, or 5m from the edge of the tree's canopy if that is larger.
- hedgerows - 5m either side, where a hedgerow forms part of an S41 native species rich hedgerow or has other significant biodiversity interest. If a hedgerow contains ancient or veteran trees, then the buffers listed above for those trees applies. Non-native hedgerows identified for retention require 2m either side.

We therefore suggest that appropriate buffers should be specified in accordance with the recommendations of the detailed ecological survey at the time of the planning application. The condition on site allocation S19 should therefore be amended through an amendment to proposed main modification MM429 so that the condition reads:

- A buffer is required to the Robin Brook watercourse which flows through the site. Minor watercourses require a minimum 3 metres either side; Ancient or veteran trees – at least 15 times larger than the diameter of the tree trunk, or 5m from the edge of the tree's canopy if that is larger; other trees – for root protection, 12 times the stem diameter requires a minimum 15m buffer either side. This buffer will be protected from built development; hedgerows - 5m either side, where a hedgerow forms part of an S41 native species rich hedgerow or has other significant biodiversity interest. If a hedgerow contains ancient or veteran trees, then the buffers listed above for

those trees applies. Non-native hedgerows identified for retention require 2m either side.

8 Management Plan for Redmires Conduit, site SWS18

- 8.1 Representation 5.0202 suggests that policy conditions should require that site masterplanning provides for management and maintenance of the Redmires Conduit heritage site and Local Wildlife Site (LWS).**
- 8.2 The Statement of Common Ground between SCC and the site promoter (EXAM 164) refers to ongoing discussions between Council officers, the site promoter, landowner and Yorkshire Water to ascertain whether a Management Plan for the Conduit could be developed and delivered. Please can you provide an update on any discussions which may have taken place since the hearings, including in terms of whether it would be feasible to deliver a Management Plan. Furthermore, does the Council consider the policy to be unsound in the absence of a specific requirement for a Management Plan?**

We consider that the production, and implementation, of an agreed management plan for the conduit is the best means of safeguarding its historic and ecological value, as well as managing any potential flood risk. However, it is possible those matters could also be dealt with through planning conditions or a legal agreement so we do not consider that the policy would be unsound in the absence of a specific requirement for a Management Plan. The landowner/ promoter of the site has not yet established contact with Yorkshire Water to begin a dialogue which would also inform discussions between the promoter and Sheffield City Council's Property Services Team.

In accordance with paragraph 142 of the NPPF (Sept 2023), the third condition on development for SWS19 (within Annex A) requires delivery of compensatory improvements identified within the 'Green Belt Allocations: Compensatory Improvement Opportunities within remaining Green Belt' document (EXAM 197) or successor documents. EXAM 197 sets out specific compensatory improvements to the environmental quality and accessibility of remaining Green Belt within the vicinity of the SWS19, this includes surface improvements to the Conduit right of way and maintenance and repairs to its structural integrity. The Council believes the policy requirement (condition on development) to deliver improvements to the Green Belt and specific identification of improvements to the Conduit within EXAM 197 provides sufficient certainty that these will be delivered.

9 Opportunity Sites

9.1 Representation 5.0467 refers to a recent Freedom of Information (FOI) request to ascertain what work the Council has done to determine if the Opportunity Sites are available. If this FOI evidence has been published and/or is available, the Council is requested to forward us a copy and add it to the examination library.

We have contacted the FOI team regarding potential outstanding FOI requests related to opportunity sites and consulted the list of FOIs that the Strategic Planning Team have recently dealt with. We have not found any FOIs that fit this description, scope, timing or requester. We had an FOI on behalf of the representor which related to a different sub-set of sites in the Green Belt, not Opportunity Sites.

10 Provision of community facilities on strategic allocation sites

10.1 Representation 5.0463 questions why community facilities are not sought on sites SES29 and SES30 given that they are treated by the Council as one strategic location. Reference is made to the Council's SPD on CIL and Planning Obligations and the IIA (February 2026) which specify that community facilities should be provided on strategic sites of 1000+ dwellings. The Council is requested to set out its response to this representation.

Site SES30 includes provision for a secondary school and a burial ground within the site boundary – both are community facilities and will serve the wider area, including site SES29. The provision proposed on site SES29 follows the assessment of infrastructure needs as part of the production of the Infrastructure Delivery Plan.

Analysis by the education service forecasts that there will be a surplus of primary school places across the city as a whole. Consequently, an allocation for primary school provision on parts of sites SES29 and SES30 is unnecessary.

The Integrated Care Board has previously advised that the need for additional primary care space could be met through a reconfiguration of existing practices in the area.

In terms of other community facilities such as small-scale meeting rooms, we are confident that these can be accommodated as part of the overall site layouts if a need is identified. As they are small scale, they would not materially affect the site capacities.

11 Existing greenspace on site SES30

11.1 At the hearing the Council indicated that part of the accessible natural greenspace on SO2502 may be needed to facilitate site access, but there is scope to retain most of the area. This is shown on the concept plan in EXAM 168. Representation 5.0463 has queried why the site policy does not refer to mitigation measures relating to replacement provision or clarify the Council's approach to the area. The Council is requested to provide a response to this representation.

The Open Space Assessment (South East Area Profile – OS13) identifies land parcel SO2502 as accessible natural greenspace. Any ecological value would be identified through the ecological surveys at the planning application stage when it would be necessary to comply with the usual BNG requirements. So, the higher the value of any habitat that is lost, the higher the compensatory measures that would be required – to ensure at least a 10% increase in BNG.

We continue to be of the view that, whilst a section of this area is needed to facilitate access to the wider site, the majority can be retained as open space as part of the overall site layout. New open space will also be provided as part of the wider allocation.

12 Affordable housing supply

12.1 Representation 5.0463 questions the Council's affordable housing supply figure of 5,531 over the Plan period, as set out in EXAM 187, citing concerns about the 'policy plus' approach on sites NES37 and SES30 and questioning the ability to secure funding from Homes England. The representation also highlights errors in the total capacity figures for NES37 and SES30 that could have implications for the estimated affordable housing figures.

12.2 The Council is requested to provide a response to the representation and clarify whether the figure of 5,531 affordable homes should be adjusted. If so, this could have implications for the published affordable housing target figure in the monitoring framework in MM221.

Affordable housing supply as set out in EXAM 187 reflected the capacities for sites SES30 and NES37 (and SWS19 which is not referenced in the representation) at a point in time, prior to the publication of the Inspector's Post Hearing Letter (EXAM 213) published in January 2026, in which the reduced site capacities for SES30, NES37 and SWS19 were confirmed.

We agree that the updated figure should have therefore been reflected in the published affordable housing target figure in the monitoring framework in MM221. The following

capacity changes are highlighted in the table published in EXAM 187 (below). Overall, the total number of affordable homes has reduced by 93 units.

Housing Supply Category	Number of Dwellings	June 2026 Update (response to EXAM 217)
Total Urban Area	4,048	4,048
Completed 2022-2025	393	393
Large sites with Planning Permission (planning permission and proposed site allocation)	635	635
Proposed site allocation - no planning permission (S106 delivery, not in a programme)	974	974
Proposed site allocation - no planning permission (Affordable Housing Programme)	2,047	2,047
Total Green Belt Additional Sites	1,248	1,165
Proposed Site Allocation 30% S106 delivery (CH05, NES38, NES39, NES37, NWS30, NWS31, SES29, SES30, SS19)	1,112	1,030
Proposed Site Allocation 40% S106 delivery (SWS18, SWS19)	136	135
Policy Plus on Green Belt Additional Sites	235	225
Proposed Site Allocation NES37 10% additional affordable housing	61	59
Proposed Site Allocation SES30 20% additional affordable housing	174	165
TOTAL	5,531 (325/yr)	5,438 (320/yr)

It is proposed the following changes are made to MM221:

*Deliver ~~5,531~~ 5,438 additional affordable homes across the Plan period
(equivalent to ~~325~~ 320 per annum).*

As requested, the following is a response to representation 5.0463:

The representation states that MM90 – MM93 should be updated to take account of the capacities of 827 homes for SES30 and 592 homes for NES37. We can confirm that the total capacities for the sites have been included in these main modifications, as

demonstrated by the total capacity figures in MM411 and MM351. It is only the affordable housing supply figure which had not been adjusted to take account of the reduced capacities. Therefore, no further action is required.

With regards to the ‘policy plus’ approach and the ability to secure funding, as stated in EXAM 187 (para 7 & 8), the likely route to securing funding is through the established frameworks Sheffield has set up through the Sheffield Together Partnership, including the South Yorkshire Housing Partnership (SYHP) who represent 13 of the largest housing associations in South Yorkshire. As set out in EXAM187 the estimated lead in times for developing SES30 and NES37 is 7 years, and the funding opportunities, including through Homes England, are over a 10-year period (as set out in para 9). The allocation of SES30 and NES37 provides certainty of a long-term pipeline of strategic sites in Sheffield (which has not been in place previously); it is this, alongside the clear policy direction and commitment to social rent, and a long-term funding framework that provides the certainty and mechanism for delivering additional ‘policy plus’ affordable homes in Sheffield.

13 Policy NC3 Affordable Housing

13.1 A number of representations on the proposed main modifications object to the percentage of affordable housing being linked to Gross Internal Floor Area (GIFA) rather than units (including 4619529, 4690585 5.0425 and HBF). This is notwithstanding that the GIFA approach is set out in submitted Policy NC3 and was covered in the Inspector’s Main Issues and Questions (and is covered in the Council’s SPD on CIL and developer Contributions). Section 19.6 in the Council’s hearing statement (WS19/1) deals with this matter.

13.2 The Council is requested to respond to the various points raised in the representations, including in terms of the practicalities of how the policy will operate.

We intend to produce an Affordable Housing Guidance note, which will explain in more detail the affordable housing requirements in Policy NC3 and set out how to calculate the affordable housing requirements as part of any planning application. The Gross Internal Floor Area (GIFA) approach is a continuation of existing policy and has been in use since 2015. The updated Guidance note will draw on detail already used in the 2015 CIL & Planning Obligations SPD, which provides practical detail.

Our response to representation 4619529 is set out in EXAM 217A under question 8. The following is our response to the various points raised in the representations.

Outline planning stage – the approach will be a continuation of existing practice (set out on the Council’s ‘approved planning guidance and advice notes’), in which affordable housing is secured in a section 106 legal agreement. This will either secure a set

amount, as a % of the gross internal floor area of the total GIFA of all dwellings to be provided as affordable housing. Or, the S106 will set out the mechanism for assessing the requirement during the reserved matters stage. In cases where the full affordable housing contribution is not committed to at outline stage, the weight afforded to it as a benefit in determining the outline application will be restricted given that viability assessment would be carried out during the reserved matters process.

Tenure split flexibility - the tenure mix set out in policy NC3 is informed by housing need evidence (Local Housing Need Assessment (LHNA) EXAM66) and Plan wide viability (VI01 and EXAM 131). It is therefore consistent with the NPPF requirement to specify the type of affordable housing required, including the proportion of social rent.

LHNA based on number of units – the LHNA sets out the need, yes as a number of units along with bedroom sizes, and policy NC3 is about *how* that need is delivered, which ultimately is a home. This can be easily monitored by recording both the final % of the GIFA of the total GIFA of all dwelling, and the resulting number of units that translates into.

Awkwardly designed units (to hit precise square metre affordable requirements) - this approach will be a continuation of existing practice and as stated in WS19/1 para 19.16.1, there is scope for flexibility. In practice, the total gross internal floor area of the identified affordable housing units does not always equate to an exact percentage of the schemes gross internal floor area, so this may also require a contribution to offsite provision.

Calculating the GIFA - this approach will be a continuation of existing practice, but we welcome the suggestion of referencing industry standard such as the RICS Code of Measuring Practice, which we will review as part of the supporting Guidance note.

14 Policy BG1 Blue and green infrastructure (new wording in third paragraph)

14.1 The Council is requested to confirm the reason for the new paragraph in Policy BG1 which states: ‘Development affecting Urban Greenspace Zones, Green Belt, Local Green Spaces, greenspaces, outdoor recreational facilities or designated ecological or geological sites should comply with policies SA5, SA6, GS1, GS1A, GS2, GS5 and GS8.’ Are all of the listed policies relevant to all of the listed types of green infrastructure? For example, the policy would require non-Green Belt sites to comply with Policy GS2 on Green Belt and non-recreation sites to comply with Policy GS1A on sports provision. Also, would it be more accurate, and therefore clear and unambiguous to decision-makers, to require schemes to be assessed against relevant policies, rather than ‘comply with’?

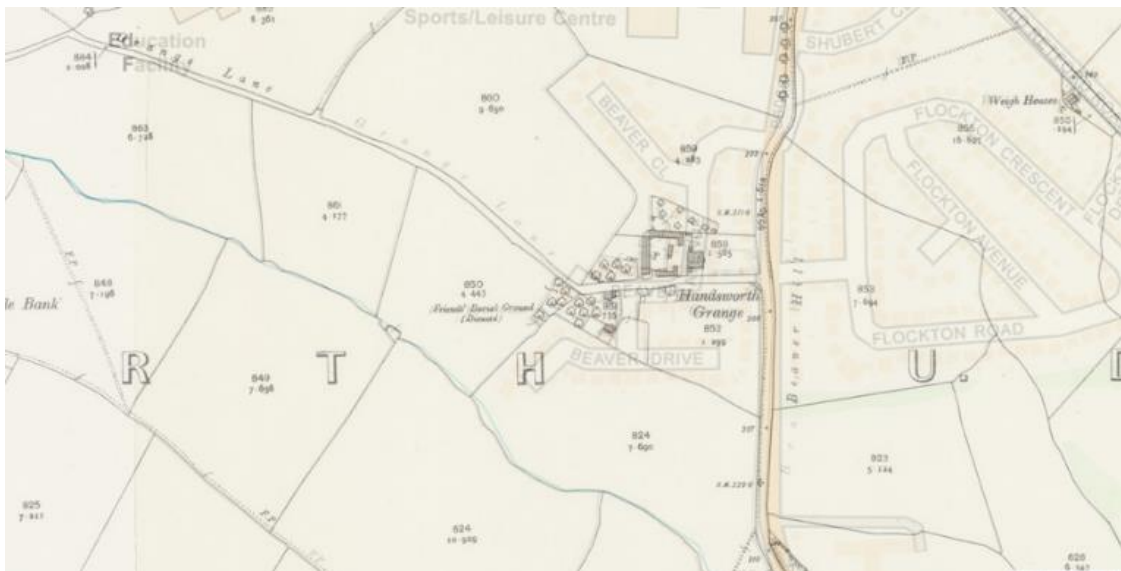
We agree that this part of the policy would be clearer and more effective if it was revised to read:

Development affecting Urban Greenspace Zones, Green Belt, Local Green Spaces, greenspaces, outdoor recreational facilities or designated ecological or geological sites should, *where relevant, be assessed against* ~~comply with~~ policies SA5, SA6, GS1, GS1A, GS2, GS5 and GS8.

15 SES30 – Quaker Burial Ground

15.1 It is our understanding that the Quaker burial ground and the Quaker meeting ground at Cinder Hill Green (as referred to in representations) are on land adjoining site SES30. Can you please confirm whether this is the case, or whether part of these areas extends into SES30? If so, are there any implications for site delivery/access of SES30? It would also be appreciated if you could provide an update on their status, e.g. whether the Council has added them to the list of local heritage assets, and progress with any applications to Historic England for listing.

The Council can confirm that the Cinder Hill Green Quaker Burial Ground is located adjacent to SES30 on its eastern boundary. No part of the recorded burial ground is located within the allocation. The maps below show the location of the cemetery in 1892, overlayed with a modern map, and its location on the Sheffield Plan Policies Map.



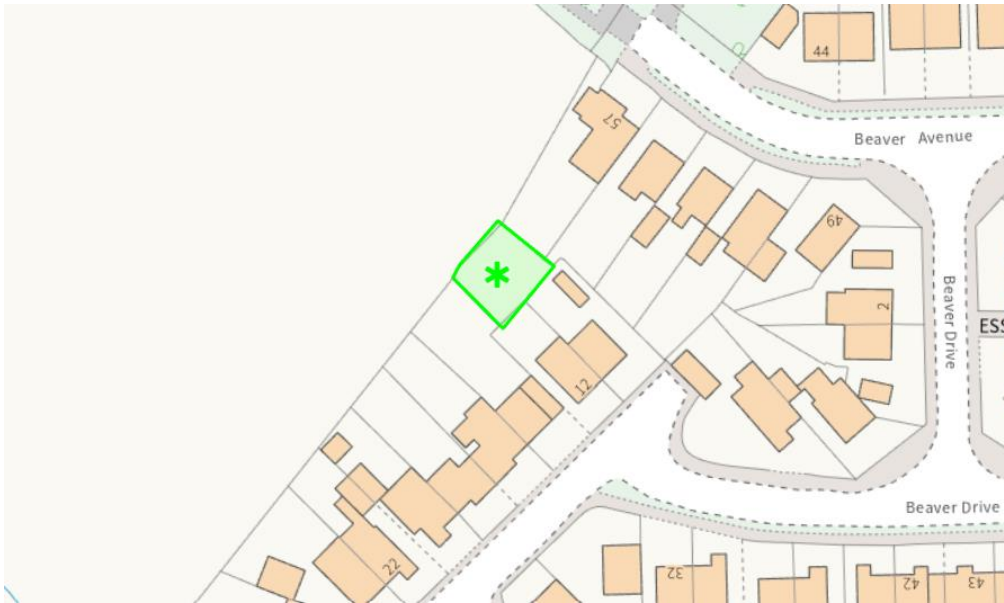
1892 Ordnance Survey map overlying modern mapping



Policies map and the location of burial ground

As the burial ground is outside the allocation, no direct harm has been identified. Whilst the setting may be affected, it should be recognised that the burial ground is already significantly affected by the postwar residential development which surrounds it on three sides. These have already separated the site from the rural setting that existed when the site was used for burials during the 17th Century. The development of SES29 does offer opportunities to provide formal access close to the burial ground and public information on its historic significance.

Regarding the burial ground's local heritage list status, it has been nominated for local listing, been through the assessment process and is recommended for local listing. It is now awaiting submission to the Head of Planning for formal adoption. Given the absence of harm to the burial ground, the site's listing would not affect the suitability SES29 for development.



Map of land that is recommended for inclusion on the local heritage list (South Yorkshire Local Heritage List).

The burial ground was submitted to Historic England for registering on the national heritage list. Sheffield City Council was notified on the 2 July 2026 that the Secretary of State has decided not to add Cinder Hill Quaker Burial Ground and Cinder Hill Green Preaching Site, Handsworth to the List at this time.

The decision can be found here:

services.historicengland.org.uk/webfiles/GetFiles.aspx?av=F3EABEB6-017C-4968-BAB2-C8F6F9D47C9D&cn=5A36CA55-D289-4110-9F59-D442138ADEAC