

SHEFFIELD PLAN – ADDITIONAL SITE ALLOCATION

LAND TO THE SOUTH OF WHITE LANE, S12 3HS (SITE REF: SS19)

EXAMINATION HEARINGS (STAGES 3 & 4), SEPTEMBER-OCTOBER 2025

STATEMENT OF THE S12 GREEN BELT ACTION GROUP

1. PREAMBLE

Introduction

- 1.1. This statement is submitted on behalf of the S12 Green Belt Action Group (hereafter **“the Group”**) in connection with the Sheffield Plan (hereafter **“the plan”**), prepared by Sheffield City Council (hereafter **“the Council”**), and specifically the additional site allocation described as ‘*Land to the South of White Lane, S12 3HS*’ (site ref: SS19) (hereafter **“the site”**).
- 1.2. Briefly, the Group is opposed to any development of the site, for the reasons set out in this statement and invite the Inspectors to take all necessary action to ensure the site is withdrawn from the plan immediately and any future attempts to develop the site as envisaged by the plan are discontinued indefinitely.
- 1.3. The Group is, nonetheless, understanding and sympathetic to the need to meet housing demand in Sheffield but consider any possible benefits from developing the site are offset by the distinct and exceptional harms to the S12 community, which are liable to result from such development.

The Group

- 1.4. The Group includes various individuals who made representations in respect of the site, as part of the consultation process which closed on 11 July 2025. The identities of those representors have been notified to the Programme Officer separately.
- 1.5. The purpose of this further statement is twofold:

- (a) to assist the Inspectors by consolidating the views of multiple representors in one document; and
 - (b) to expand on those representations already submitted, where additional evidence is now available.
- 1.6. The views of the Group are representative of the wider opposition of the S12 community to the development of the site. At the time of writing, an online petition opposing the site allocation has attracted 2007 verified signatures.¹ In addition, a paper petition currently being compiled by the Group, comprises 609 signatures.²
- 1.7. The Group is grateful to the Inspectors for granting us the opportunity to submit this statement. However, for reasons explained below, we consider that the consultation process has been gravely inadequate, and members of the community have not been afforded a proper opportunity to express their views. We therefore reserve the right to introduce further evidence at the Examination Hearings, which is not available at the time of preparing this statement.
- 1.8. We understand that examination hearing concerning the site is currently listed to take place at **2pm on Thursday 2nd October 2025**. It is anticipated that the Group will be represented by a delegation at the hearings, but not all those identified to the Programme Officer will be present. A list of those attending will be notified to the Programme Officer as soon as possible.

2. NATIONAL PLANNING POLICY FRAMEWORK

- 2.1. We submit the Plan, insofar as it relates to the site, departs from the requirements of the National Planning Policy Framework (hereafter “**the Framework**”) in several fundamental respects, as outlined below and elsewhere in this statement. Any departure from the Framework must be ‘*reasoned*’³, which we submit they are not.

¹ Change.org, ‘Protect Greenbelt Land on White Lane, Charnock’ (Change.org, 24 July 2025) <<https://www.change.org/p/protect-greenbelt-land-on-white-lane-charnock>> accessed 2 August 2025.

² Available on request

³ *The Queen (on the application of Lochailort Investments Limited) v Mendip District Council* [2020] EWCA Civ 1259, para 33

Soundness

- 2.2. We submit that the Plan fails to satisfy the soundness test required by the Framework (para. 36-38)
- (a) The Plan is not '*justified*' (para. 36(a)). It fails to properly consider reasonable alternatives, and the allocation of the site is not founded in evidence and ignores fundamental issues affecting the S12 community.
 - (b) The Plan is not '*effective*' (para 36(c)). It is not deliverable over the plan period, or at all. The exceptional issues concerning the site are unassailable and delivery of this site is not feasible as envisaged or otherwise. There has been a clear failure to coordinate effectively between the Council and the neighbouring North East Derbyshire District Council (hereafter "**NEDDC**"), as we explain in section 8 of this statement.
 - (c) The Plan is not '*consistent with national policy*' (para 36(d)). The delivery of a sustainable development consistent with the Framework on the site is impossible; and that the plan fails to meet the '*basic conditions*' set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990, most notably section 2(d)-(e).
- 2.3. Indeed, the extent to which the allocation of this site is justified by planning principles and policy at all is questionable. We refer the inspectors to an excel spreadsheet ⁴, which contains comments made on social media by Labour Councillor, Ruth Milsom (prepared by the S35 green belt opposition group).
- 2.4. On 3 July 2025, in response to a comment from anonymous member 724, Ms Milsom replied (emphasis added):

*'...And whilw [sic] we're on political parties, **everyone who's angry about the unfair distribution of greenbelt sites (two measly small fields in the south west of the city) wants to look at how the liberal democrat councillors in Dore and Totley have kicked off about one tiny site the Parker's lane one.** If anyone's the nimbys it's them.*

Plus there was a planning application to build a retirement village on the site of Dore Moor garden centre so a brownfield site and they mounted a massive campaign to get rid of that.

⁴ Save CEG Green Belt Community Campaign, (*Ruth Milsom Facebook Posts to Save CEG Green Belt Comments*, 2025) <Documentation | Save CEG Greenbelt> accessed 22 August 2025.

At least the labour councillors tried to get fairer distribution of sites. I heard that Tom Hunt made the planning officers reconsider a load of sites in the SW but they would only agree to that Lodge Moor one.'

- 2.5. On 8 July 2025, in response to a comment from anonymous member 491, Ms Milsom replied (emphasis added):

*'C T I'm more bothered about the councillors in Dore tbh. **They're all Liberal Democrats and they've said not on your nelly will we accept more homes being built on our patch.***

The Liberals in Fulwood the same. *One piddling field in Lodge Moor and they're losing their minds.*

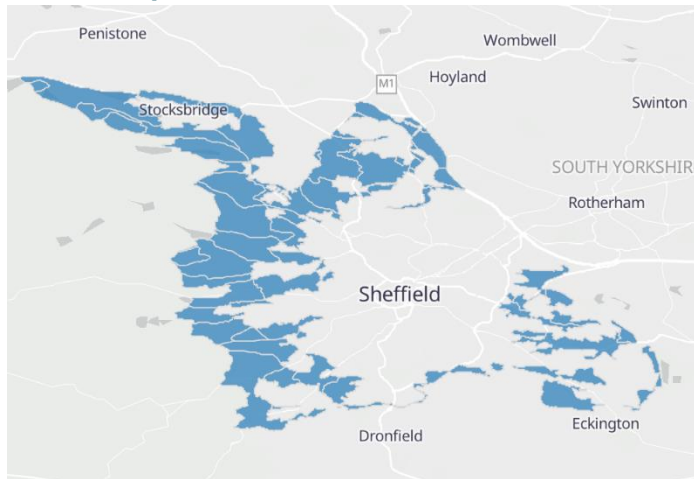
Credit where it's due. The Labour councillors did at least try to get more greenbelt sites in the south west to spare some of the losses in the north and south east.'

- 2.6. Assuming the content of Ms Milsom's statements to be accurate, it appears that the fair distribution of site allocations in Sheffield has become corrupted by party politics and has strayed beyond the legal, regulatory and policy apparatus that exist to guide planning decisions. Notwithstanding the apparent unfairness in the distribution of site allocations between various areas of the city, it is our submission that the proposed development of the SS19 site is not sound in any event.
- 2.7. It would be remiss, however, not to mention the glaring disproportionately of allocations between East and West Sheffield, with 30% of the proposed housing sites in the West, 15% in the North but the South East is expected to absorb 55% of the housing shortfall (1,942 new homes) ⁵, despite having considerably less green belt (see **Figure 1** on the next page). The allocation of sites between East and West is wholly unfair and poses **disproportionate reduction** of the South East Sheffield green belt.

⁵ CPRE, Sheffield Local Plan (CPRE The Countryside Charity, 2025) <<https://www.cprepsy.org.uk/take-action/sheffield-local-plan/>> accessed 20 August 2025

Figure 1

Sheffield Landscape Character Assessment - Green Belt Area | Sheffield City Council Open Data



Release of green belt

Exceptional circumstances

- 2.8. The Framework requires exceptional circumstances to be ***established*** for the release of green belt for development. We submit that the Council has failed to clearly establish the presence of exceptional circumstances exist in relation to the SS19 site, or at all.
- 2.9. The Plan cites the Inspector's letter, dated 6 February 2025, which states: 'exceptional circumstances ***could*** exist in principle to warrant the release of some further Green Belt land for housing' (emphasis added). The Council conclude in the Plan that exceptional circumstances ***do*** exist, on the basis that housing and employment land needs within the existing urban area and that demand cannot be met by neighbouring local authorities (relying presumably on the justification prescribed in paragraphs 146 and 155(b) of the Framework).
- 2.10. The Framework requires that green belt boundaries should only be altered where exceptional circumstances are '***fully evidenced and justified***' (para 145) Plainly, the fact that exceptional circumstances ***could*** exist, does not satisfy the Framework threshold and the Council's precipitous leap to the conclusion that exceptional circumstances are established, is not grounded in evidence.

- 2.11. The onus is on the Council to demonstrate that exceptional circumstances exist in relation to ***each*** individual site which it intends to release from the green belt. It is not sufficient to rely on a generic justification based on the city's broader needs to meet housing demand. There has been no meaningful site-specific assessment of whether exceptional circumstances are present in relation to the SS19 site, to which we say, they do not.

Brownfield and underutilised land

- 2.12. The Plan acknowledges that before concluding exceptional circumstances exist, all other reasonable alternatives must have been fully examined. The Framework requires full exploration of brownfield and underutilised land (para 147(a)) and that '*substantial weight*' be given to using brownfield land for homes (para 125(c)). The Council's assertion that all brownfield and underutilised land has been exhausted is not fully evidenced and the process by which sites are assessed and excluded (based on availability and viability) lacks transparency.
- 2.13. Most alarming is the Council's apparent failure to have maintained an up-to-date register of Brownfield sites, in accordance with Regulation 3 of the Town and Country Planning (Brownfield Land Register) Regulations 2017. Regulation 17 requires the register to be updated at least once a year. At the time of writing, the most up to date register publicly available is dated 2023 (as is the Housing and Economic Land Availability Assessment).
- 2.14. If the Council is failing to maintain a proper record of brownfield sites, its assurances that it has properly applied the sequential test and exhausted all avenues for further brownfield development, cannot be considered credible. This failure undermines public confidence in the Plan.
- 2.15. In the interests of transparency, the Council should be required to produce an up-to-date register accompanied by a report which clearly states which brownfield sites have been excluded from the Plan and why. We are concerned that the cost and expediency of developing green belt sites is being preferred over the more challenging task of repurposing brownfield sites. We note that green belt sites of 500+ units can be delivered 34% quicker (and therefore more cheaply) than their brownfield counterparts.⁶

⁶ Litchfields, '*How Quickly Do Large Scale Housing Sites Deliver*' (3rd Edition, Litchfields, 2024) https://lichfields.uk/media/w3wjmw0/start-to-finish-3_how-quickly-do-large-scale-housing-sites-deliver.pdf accessed 17 August 2025.

- 2.16. In addition, the Council's failure to issue a renewed call for sites (the last one having been issued **6 years ago** in 2019) gives the unavoidable impression that the Council has no contemporary understanding of the land available to meet housing demand in the city. Research has identified that Sheffield has between 2,450 and 7,000 '*empty and low use homes*',^{7 8} yet the Plan and associated documents give no serious consideration of how housing demand might be met from empty and low use homes.
- 2.17. Taking account of these factors, the Council's decision to release further green belt appears, to put it mildly, overhasty and reckless.

Purposes of green belt – scoring

- 2.18. The Plan also cites the Inspectors' comment that some sites identified by the Council have either low or modest scores against the purposes of green belt. We remind the inspectors that the Council has previously stressed the importance of robust, permanent green belt boundaries, which respect local circumstances and the need to avoid undermining the green belt purposes in an area, even where sites are assessing as low scoring against the purposes of the green belt⁹.
- 2.19. We would submit that the score attributed to the SS19 (14) site significantly underestimates its value against the green belt purposes and is based on a superficial understanding on the site's location and crucial role it plays in reinforcing the green belt purposes. The site is positioned immediately on the boundary with North East Derbyshire and plays a vital role in supporting the ecology of the Moss Valley (factors explored further in section 7 of this statement). Accordingly, we consider that the site scores very strongly against green belt purposes, most prominently 143(b)-(c) of the Framework.
- 2.20. We note that several sites that scored lower against the green built purposes have been omitted from the Plan and question the apparent illogic of the SS19 sites inclusion, at the expense of lower scoring sites. We also note that

⁷ Yahya Aydin, '*Low Use Homes in Sheffield.*' (Report, The University of Sheffield, 2024) <https://orda.shef.ac.uk/articles/report/Low_Use_Homes_in_Sheffield/26125168?file=47302720> accessed 20 August 2025.

⁸ Gerry Georgieva, '*Empty homes are on the rise. So why aren't they being used to solve the housing shortage?*' (BBC News, August 2025) <<https://www.bbc.co.uk/news/articles/c3r413l5n57o>> accessed 21 August 2025

⁹ Sheffield City Council, '*Draft Sheffield Plan, Green Belt Review Update*' (November, 2024) <<https://www.sheffield.gov.uk/planning-development/emerging-sheffield-plan-draft>> accessed 20 August 2025.

average scores for general green belt areas in the South East (14.4) and South South East (14.7) were greater than those in areas in the more affluent South West, for example Bents Green (13.5), Dore South (14.3) and Fulwood (14). This is not reflected in the overall site allocation, with sites in South East Sheffield making up the bulk of the shortfall, despite having markedly less green belt.¹⁰

Inappropriate development, sustainable location

- 2.21. We submit that the release of the site from the green belt is ‘*inappropriate*’ in accordance with the meaning attributed to this term at para 153 of the Framework. We submit that none of the limited exceptions prescribed by paragraph 154 apply in relation to the SS19 site.
- 2.22. For reasons which will be outlined in the following sections of this statement, we submit that the site is not a ‘*sustainable location*’ for the purposes of para 155, is further inconsistent with the principles of Framework in multiple respects (most prominently, paragraphs 115 and 116).

Biodiversity net gain

- 2.23. Biodiversity net gain (BNG) is required in accordance with Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). We are unaware of any proposals of how BNG will be achieved at the site. At the time of writing, the only consideration we are aware of is to impose an 8m buffer around the Robin Brook.
- 2.24. The notion that BNG can be achieved at the site, by replacing land with innumerable irreplaceable ecological and heritage features, with 300+ houses, is at best, fanciful. As will be detailed in section 7 of this statement, the impact of development on this site on biodiversity simply cannot be mitigated or compensated.

Irrationality and procedural unfairness

- 2.25. We present in this statement indisputable reasons why development of the site is unviable and therefore is irreconcilable with the Framework and other legislative, regulatory and policy instruments. If a decision is taken to

¹⁰ Sheffield City Council, ‘*The Sheffield Plan Our City, Our Future Green Belt Review September 2020*’ (Sheffield City Council, September 2020)
<<https://www.sheffield.gov.uk/sites/default/files/docs/planning-and-development/draft%20sheffield%20plan/Green%20Belt%20Review%2021%20September%202021.pdf>>
accessed 20 August 2025

proceed with the development, we consider that it may be challengeable on grounds of irrationality. We submit that such a decision would be ‘so *unreasonable, that no reasonable authority could ever have come to it*¹¹ and ‘so *outrageous in its defiance of logic*¹² that no sensible local authority could have arrived at it.

- 2.26. We also demonstrate in the following section that the Council has failed absolutely in its duty to conduct a proper consultation, in breach of a host of legislative, regulatory and policy provisions. These failings are of the utmost severity and we consider any decision to proceed with the development of in light of these failings may render it challengeable on the grounds of procedural *ultra vires*.

3. CONSULTATION PROCESS

- 3.1. We submit that the Council has failed to conduct a consultation in accordance with its Statement of Community Involvement (dated 29 July 2020); as required by sections 18 and 19 of the Planning and Compulsory Purchase Act 2004.
- 3.2. We further submit that these failures fall foul of the Council’s duties imposed by section 61W of the Town and Country Planning Act 1990, section 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Article 15 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.
- 3.3. The content of the Plan has profound implications for communities across the city, yet the consultation process has been inadequate, rushed, and in many respects inaccessible. Our own polling shows that at least 28% of residents in the Charnock area were unaware of the plans for the SS19 site and the related consultation. Of those surveyed, 10% of households do not have access to the internet, effectively excluding them from any engagement with the process, which was promoted primarily online (data available on request).

¹¹ *Associated Provincial Picture Houses v Wednesbury Corporation* [1948] 1 K.B. 223, 234

¹² *Council of Civil Service Unions and Others Appellants v Minister for the Civil Service Respondent*, [1985] A.C. 374, 410

3.4. We have submitted a Freedom of Information request (ref: 101000642545) to Sheffield City Council asking for the full details of how the consultation was publicised, including (but not an exhaustive list):

- the number and location of leaflets delivered
- the cost of publicity
- the number of website hits and document downloads; and
- the level of attendance at drop-in events.

3.5. At the time of writing, no response has been received.

Inaccessibility

3.6. The Council's own SCI makes clear commitments to early and ongoing involvement, to "reaching out" to those with barriers to engagement, to using a wide range of publicity channels (press, posters, public meetings, exhibitions, drop-in sessions, hard copies in public locations), and to ensuring equality of access. Yet residents' experience shows that these commitments were not delivered in practice.

- No written notice was circulated to residents directly affected by the proposed sites, undermining the SCI principle of targeted engagement.
- Events were limited to a small number of drop-ins rather than broader public meetings and were poorly timed for those with work or caring commitments.
- Technical questions went unanswered, contradicting the SCI's promise of clarity and feedback to consultees.
- The reliance on a digital-only approach excluded those without internet access, contrary to the SCI's accessibility obligations.

3.7. The Council's own data (EXAM 134) confirms the weakness of the online approach: out of 3,663 total representations, only 758 (21%) were submitted through the consultation portal. By contrast, 2,458 responses (67%) were sent by email and 447 (12%) by post. This demonstrates that most residents avoided the official portal which strongly suggests it was hard to use, inaccessible, and unfit for purpose as the primary means of engagement.

3.8. By comparison, the NEDDC Local Plan consultation portal not only allowed submissions on specific sites but also included 80+ structured questions on the Local Plan as a whole, alongside opportunities to raise overlooked issues

and suggest alternative approaches to implementation. This demonstrates that more accessible and meaningful engagement tools are both possible and expected.

- 3.9. The over-reliance on online to disseminate the information about the Plan made it incredibly difficult for those with limited internet connectivity, such as the elderly or those in poverty to be able to actively participate in the consultation (note, those aged 65+ account for 18% of the S12 population according to census data ¹³. Our own research confirms that of 292 people surveyed 28% had no knowledge of the plans for the SS19 site or the associated consultation, before engaging with our group; and 609 people asked, 10% have no internet access.
- 3.10. For those who were made aware of the plans, they were wholly inaccessible. The Council adopted the model representation for local plans, which invites participants to give details of why the Local Plan is not '*legally compliant or is unsound or fails to comply with the duty to co-operate*'. The language used is completely inaccessible and is for all intents and purposes, legalese. The expectation of ordinary private citizens to have even a basic understanding of these terms is frankly absurd and fails to give any consideration to those for whom may face added difficulties engaging with the process (for example, by virtue of disability).
- 3.11. A common theme amongst those who have engaged with this group was a lack of understanding of how to properly engage with the consultation. The obfuscatory and intimidating language adopted by the Council has played a decisive role in discouraging participation. This represents a failure to follow Government accessibility guidance ¹⁴ and is wholly at odds with the purposes and spirit of the SCI.
- 3.12. Similarly, the sheer volume and length of documentation produced by the Council in addition to the Plan (a mere 66 pages) has been a significant barrier to community engagement. The Plan cites approx. 20 other documents, pieces or legislation and regulations. The [Sheffield Plan - proposed additional site allocations | Have Your Say Sheffield](#) website includes 40+ documents. The [Adopted Sheffield Local Plan | Sheffield City Council](#) website includes 30+ documents relating to the plan. The [Sheffield](#)

¹³ Sheffield Local Authority and England Country, '2021 Census Area Profile - Birley Ward (as of 2022)' (Nomis, 2022) < https://www.nomisweb.co.uk/sources/census_2021/report?compare=E08000019 > accessed 17 August 2025

¹⁴ Gov.UK, 'Guidance Publishing accessible documents' (GOV.UK, 14 August 2024) <<https://www.gov.uk/guidance/publishing-accessible-documents>> accessed 15 August 2025.

[Plan](#) website includes 200+ documents (note the lack of a single central location for all documentation).

3.13. The length of documentation is similarly prohibitive. For example, the Integrated Impact Assessment Report (Update and Addendum) runs to an astounding 428 pages. This is a document cited numerous times in the Plan and is clearly an important document. The expectation that ordinary citizens have the requisite level of knowledge (let alone time) to meaningfully engage with voluminous documents of this size and complexity is preposterous, and is another reason commonly cited to this group as a barrier to participation.

3.14. Further we submit that the available documentation fails to meet accessibility requirements in accordance with Government guidance, which is designed to ensure all government documentation adheres to accessibility standards (legally required by the Equality Act 2010). The guidance states ¹⁵:

- *The document should have a simple structure.*
- *Use simple language and plain English.*
- *Link text should clearly describe where the link goes.*
- *PDF's should be avoided in favour of HTML, especially due to the use of screen readers (which when tested, several documents could not be read by a screen reader, making these documents inaccessible for people who use this assistive technology).*
- *Alt. text should be used on all images.*
- *All maps should include keys.*
- *Consistency should be used naming items/documents e.g. both SS19 and S02898 are used, further to this S02503 is on the SFRA_Detailed.pdf flood map. It is unclear what this corresponds to as it's mentioned only a couple of times throughout the documentation.*
- *Documents should have meaningful titles. Many documents have the same title with a different number for an example of this please see **Figure 2** on the next page. To be accessible and inclusive, the documents should be titled to make navigation easy e.g. Appendix A Map SS19, SW05, so people know which corresponds to their area.*
- *The colour of documentation should be off white with black text, and limited use of italics.*
- *Tables should be used minimally and header rows used if tables are necessary to ensure screen readers can follow it.*
- *A named contact should be provided so any person can discuss their personal accessibility needs for documentation.*

¹⁵ Ibid

- 3.15. The screenshot below taken from [Sheffield Plan - proposed additional site allocations | Have Your Say Sheffield](#) is just one example of the Council's failure to adhere to the guidance:

Figure 2 – Document Titling Example



- 3.16. Navigating to the correct consultation documentation is complicated, many documents are located on multiple websites. For example, SFRA Level 1 is located on the plan website whilst SFRA Level 2 is located on the Inspector's website. All documentation should be readily available and located in a central place to aid navigation and ensure transparency. Many documents also contain several links to further documentation; this is not accessible or screen reader friendly. 29% of the population use a screen reader and 8% use other assistive technologies¹⁶. The current documentation structure excludes or makes it challenging for those using assistive technologies compared to those who do not resulting in inequality.
- 3.17. The Statement of Community Involvement (2020) also commits the Council to making consultation documents available in different languages and

¹⁶ GOV.UK 'Results of the 2016 GOV.UK assistive technology survey' (Accessibility in government, 1 November 2016) <<https://accessibility.blog.gov.uk/2016/11/01/results-of-the-2016-gov-uk-assistive-technology-survey/>> 17th August 2025.

formats including translations of key parts of documents on request, interpreter support, and compatibility with tools like Google Translate. The SCI specifically states:

‘Google Translate is available on all web pages and provides basic translations in to several languages’ (p 20, para 3.30).

- 3.18. In practice, however, the consultation portal offered no visible option to change language, and all published documents were only in English. There is no evidence in the Reg 22 Addendum (EXAM 134) that alternative formats or language support were offered during the 2025 consultation. This is not only a breach of the Council’s own SCI commitments but also raises concerns under the Equality Act 2010, Section 149 – the Public Sector Equality Duty, which requires public bodies to eliminate discrimination, advance equality of opportunity, and foster good relations between different groups. By failing to provide accessible language options, Sheffield City Council has potentially excluded residents from minority language backgrounds from meaningful participation in the Local Plan consultation.

In-person events

- 3.19. It should be noted that the Council failed to arrange **any** in-person consultative events for the community concerned with the SS19 site, until challenged on this matter by members of the community. Prior to this, residents were expected to attend events in other postcodes, primarily concerned with other sites. This is neither inclusive nor accessible leaving large sections of the community, for example, the elderly, disabled, and non-drivers unable to attend. It should be noted that the Woodhouse venue had 8 car-parking spaces making it difficult for those with disabilities to attend. The use of security guards at some events was entirely inappropriate creating an intimidating atmosphere which all sections of the community found unsettling, further prohibiting participation.
- 3.20. The Policy Committee Decision Report concerning the Sheffield Plan – Update on Progress and Proposed Additional Site Allocations meeting held on 30th April 2025 states on p33 section 3.14.8:

‘The public consultation will be targeted at those parts of the city that are most affected by the proposed additional site allocations. Officers will liaise with the Local Area Committees and the Parish/Town Councils to agree a series of ‘drop-in’ sessions. The consultation will focus on the following LAC areas: Southeast – focussed on Woodhouse Ward, Richmond Ward and Birley Ward’

- 3.21. The S12 drop-in session was only organised in response to complaints made by residents of the Charnock community to Councillors through social media regarding the lack of accessibility at other drop-in sessions (particularly for the ageing population) and the lack of public transport available connecting S12 and S13.
- 3.22. A drop-in event was arranged for Charnock residents on 5 July 2025 at the Charnock Library (a mere **6 days** before the deadline for representations to be made in connection with the Plan), which was attended by Councillors Karen McGowan and Matthew Dwyer, along with Clive Betts MP. This was the **only accessible** in-person event arranged for members of the S12 community. Representatives for the Council's Planning Department declined to attend the session, despite being invited to do so leaving the Councillors and Mr Betts to respond to questions about the Plan and consultation, which ought properly to be answered by representatives from the Planning Department. We exhibit this email chain marked "**Exhibit 1**".
- 3.23. This session was only publicised by the abovenamed Councillors on their social media pages and by way of two posters placed in the library and one GP surgery on White Lane. It did not feature anywhere on the Council's website and was not otherwise communicated to residents. The result was that S12 residents were unfairly prejudiced and did not have the same opportunity as those in other areas to learn about the Plan and consultation, ask relevant questions and prepare informed representations.
- 3.24. This Group and other members of the community have attempted to spread awareness of the SS19 site plans and consultation, yet many in the community remain unaware at the time of writing this statement. Until recently, this included those living in homes immediately bordering the site e.g., on Carter Hall Lane). This Group is only aware of two residents (on Arnold Avenue and Smithfield Road) that reported receiving any correspondence concerning the site. There has been no or no effective communication of the plans to the community, enabling any meaningful engagement with the consultation process. The burden of informing the community has fallen squarely on the community. Put plainly, **this is not our job**.
- 3.25. The Council's failure to abide by its own SCI in connection with the SS19 site consultation are truly staggering. The Council did not:
- Encourage involvement in planning
 - Involve the community by engaging at the earliest opportunity
 - Encouraging involvement appropriate to people's experience and needs.

- Provide a clear planning process with timetables for production or review of local development documents and planning decisions (para. 1.3)
- Publicise the consultation through social media (and had it have done so, those without access or not subscribed to the Council's social media, would not have seen it in any event)
- Use posters or newsletters
- Publish questionnaires
- Hold public exhibitions, meetings, events or drop-in sessions (save for in the limited circumstances mentioned above) (para 2.1)
- Ensure equality by recognising additional barriers and constraints (para 2.3)
- Produce planning documents in plain language (para 2.4)

3.26. These failures cannot be ignored or downplayed. They constitute a dereliction of duty of the gravest kind and a flagrant violation of the Council's statutory and regulatory duties; the result of which is an undermining of public confidence in the Council's competence and integrity.

3.27. We submit that a consultation process where: approx. a third of residents were unaware of the consultation; whole sections of the population were digitally or otherwise excluded; residents' questions went unanswered; and the official consultation platform was rejected by nearly 80% of participants – cannot credibly be described as meeting the tests of soundness required by the Framework.

3.28. It is our intention to raise a formal complaint to the Council concerning (but not limited to) the consultation process.

4. TRAFFIC / ROAD SAFETY

Traffic

4.1. The extensive traffic and road safety issues affecting the local road network surrounding the site cannot be unknown to the Council. According to Sheffield City Council's own traffic counts (2020–2024), South-East Sheffield has the highest volume of traffic on minor roads citywide.¹⁷ We are therefore surprised to see there has been a total failure to account for the SS19 site specific issues in the Plan and associated Report on Local Road Network Impacts and Potential Mitigation.

¹⁷ Department for Transport, 'Road traffic statistics' (Local authority Sheffield, 2000-2024) <<https://roadtraffic.dft.gov.uk/local-authorities/159>> 11 July 2025.

- 4.2. There are significant issues with traffic congestion, which primarily affect White Lane (including Fox Lane junction), Bowman Drive, Charnock Dale Road and Carter Hall Road but undoubtedly have knock on effects for roads in neighbouring areas, including Gleadless Townend, Basegreen, Hollinsend and Birley. Development of the site poses a serious risk of exacerbating existing gridlock traffic conditions and causing severe disruption to daily traffic flow, with the addition of an estimate 720¹⁸ further vehicles from this site alone.
- 4.3. Table 6 on page 27 (see **Figure 3**) of the Local Road Network report projects junction capacity in South Sheffield. Whilst the table fails to address the key junctions in immediate proximity to the SS19 site, it does give an indication of junction capacity in the surrounding area, with forecasts operating grossly exceeding operational capacity. For example, the A6102 Ridgeway Road / B6388 Gleadless Road junction (the closest to the SS19 site) forecasts evening peak flows of 161%, with implementation of the Plan. Similar extremes of capacity are envisaged at the A6102 Bochum Parkway / Norton Avenue junction (Norton Avenue notably intersecting with White Lane at Gleadless Townend).
- 4.4. We anticipate that similar increases in capacity could be expected at the key junctions surrounding the SS19 site, which would impose intolerable pressures on the local road network, already operating at capacity.

Figure 3

JUNCTION UNIQUE ID	JUNCTION NAME	CAPACITY RESULTS							
		2029 Reference Case		2029 'with Local Plan'		2039 Reference Case		2039 'with Local Plan'	
		MORNING PEAK	EVENING PEAK	MORNING PEAK	EVENING PEAK	MORNING PEAK	EVENING PEAK	MORNING PEAK	EVENING PEAK
L-SE-19	B6388 Gleadless Road / Daresbury Road	59%	78%	59%	79%	60%	81%	62%	84%
L-SE-20	A6135 Granville Road / City Road	103%	74%	106%	76%	103%	75%	108%	79%
L-SE-21	A6135 City Road / Manor Lane	88%	133%	96%	133%	83%	131%	115%	136%
L-SE-22	A6135 City Road / Wulfric Road	195%	181%	205%	196%	199%	194%	213%	219%
L-SE-26	A6102 Ridgeway Road / Newlands Road	96%	102%	111%	104%	116%	105%	122%	110%
L-SE-27	A6102 Ridgeway Road / B6388 Gleadless Road	91%	111%	95%	118%	90%	141%	93%	161%
L-SE-28	A6102 Bochum Parkway / Norton Avenue	97%	109%	96%	114%	97%	116%	99%	122%

¹⁸ Office for National Statistics, 'Census 2021: Car or van availability (TS045) — total number of cars in Sheffield' (Office for National Statistics, 28 March 2023).

- 4.5. The Charnock area (which includes Bowman Drive, Charnock Dale Road and Carter Hall Road) is bordered to the [WEST] by the A6102, Norton Avenue and to the [NORTH] the B6388, White Lane. Both are extremely busy commuter arteries to Sheffield City Centre, the Sheffield Parkway, the M1 and other residential communities. The speed limit on Norton Avenue is 40mph. Between High Lane and Fox Lane junction, the speed limit on White Lane is 40mph (recently reduced from the national speed limit); and from Fox Lane Junction to Gleadless Townend, the speed limit is 30mph. The speed limit on Bowman Drive, Charnock Dale Road and Carter Hall Road (and surrounding roads) is **20pmh**. Norton Avenue and White Lane intersect are Gleadless Townend, where there are a series of traffic lights (see **Figure 4**, with the SS19 site outlined in red).

Figure 4



- 4.6. Up to date publicly available traffic data for the S12 areas mentioned above is limited. Manual count figures from 2019 on White Lane (site ref: 940082), which is categorised as a 'Minor B Road', show annual average daily flow of 8,316 vehicles (with an average of 7,349 vehicles over an 11-year period). Notably these figures are taken just before White Lane enters High Lane and therefore do not account for the significant number of vehicles entering White Lane at the Fox Lane junction, or from other feeders' areas such as Gleadless

Townend, Birley, Charnock, Frecheville, Basegreen and Charnock¹⁹. Notwithstanding, these figures demonstrate that White Lane experiences significantly above average daily flow for urban minor roads, with the average being between 2,100 and 2,600 vehicles per day, based on RAC and Department for Transport statistics.^{20 21 22}

- 4.7. The data for Norton Avenue (site ref: 7818) is more current, showing annual average daily flow of 35,835²³. What is plain, is Norton Avenue and White Lane have extremely high daily annual flow, which converges at the Gleadless Townend junction, a short distance from the SS19 site.

Road Safety

- 4.8. Road traffic accident statistics for White Lane show that between 2013 and 2023 there were over 40 accidents between Gleadless Townend and the traffic analysis datapoint near the Phoenix Pub (S12 3XF). Two of those accidents were fatal leading to a 40mph limit being imposed between the Fox Lane junction and the Phoenix Pub, implemented in early 2025. There have been other historic fatal accidents on the same stretch of road, which have been widely publicised in local media. In addition, 10 of the 40 accidents are classified as “serious”, with 16 concentrated around the junctions immediately surrounding the SS19 site, namely Lister Avenue, Carter Hall Road & Fox Lane²⁴.

¹⁹ Department for Transport, ‘*Road traffic statistics Manual count points Site number: 940082*’ (Local authority Sheffield, 2000-2024) <<https://roadtraffic.dft.gov.uk/local-authorities/159>> accessed 18 August 2025.

²⁰ RAC Foundation, ‘*Motoring FAQs Q46) How busy are the roads in Great Britain?*’ (RAC Foundation, 2024) <<https://www.racfoundation.org/motoring-faqs/mobility>> accessed 18 August 2025.

²¹ Department for Transport, ‘*Road Traffic Estimates: Great Britain 2019*’ (Department for Transport, 10 September 2019) <https://assets.publishing.service.gov.uk/media/5f5a32ade90e072077aafe94/road-traffic-estimates-in-great-britain-2019.pdf> accessed 18 August 2025.

²² Department for Transport, ‘*Road traffic estimates in Great Britain, 2024: Traffic in Great Britain by road type*’ (Department for Transport, 12 June 2025), <<https://www.gov.uk/government/statistics/road-traffic-estimates-in-great-britain-2024/road-traffic-estimates-in-great-britain-2024-traffic-in-great-britain-by-road-type>> accessed 18 August 2025

²³ Department for Transport, ‘*Road traffic statistics Manual count points Site number: 7818*’ (Local authority Sheffield, 2024) <<https://roadtraffic.dft.gov.uk/manualcountpoints/7818>> accessed 18 August 2025.

²⁴ Think!, ‘*Think! Map*’ (Think! Map, 2025) <<https://www.think.gov.uk/thinkmap/>> accessed 18 August 2025.

- 4.9. The wisdom of attempting to construct access to the site anywhere on White Lane has to be questioned, in the context of such serious road safety concerns.
- 4.10. There are heavy queues of traffic, daily, heading towards Gleadless Townend, from Norton Avenue and White Lane (including Fox Lane junction). To avoid these queues, many motorists use Bowman Drive, Charnock Dale Road and Carter Hall Road as a “rat run”, to navigate between Norton Avenue and White Lane. At the request of residents and arranged by Clive Betts MP and South Yorkshire Police, a traffic survey carried out on Charnock Dale Road on 07 March 2023 from 13:36 to 14:06 observed 46 cars travelling in above of the 20mph speed limit, with the average speed being 28.4mph (see **Figure 5**).

Figure 5

From [REDACTED] [REDACTED]@southyorks.pnn.police.uk>
Sent: 21 March 2023 10:05
To: 'Clive Betts MP' <officeofclivebettsmp@parliament.uk>
Subject: FW: (Case Ref: ZA24019) from Clive Betts MP

Good morning Clive.

Two of our PCSOs [REDACTED] and [REDACTED] completed a speed operation on 7th March 2023 on Charnock Dale Road near to the school between 13:36-14.06hr. This location has a 20mph speed limit.

Out of 46 cars checked 13 were over the 24 mph threshold, with the top speed being 34mph. (average speed 28.4).

Having checked keeper details over half of the speeding cars live on Charnock Dale Road or surrounding roads like Arnold Avenue.

All details will be sent to Safety Camera Partnership for advisory letters to be issued.

Some of the local residents approached the officers conducting the speed check and thanked them for their good work.

I have requested the officers to re-attend attended and repeat the operation.

Kind regards

[REDACTED]

APS 51 [REDACTED]

- 4.11. Notably, the survey took place outside peak commuter times and therefore does not accurately reflect the extent of the issue. Notwithstanding, the tests clearly show evidence of consistent and unsafe driving practices, which are a direct result of congestion on Norton Avenue and White Lane. No measures have been taken to address these issues, and they persist today.
- 4.12. As will be detailed later in this statement, there are several facilities on Bowman Drive, Carter Hall Road and Carter Hall Lane, which are attended primarily by children. These include a BMX track and playing fields (Bowman Drive), nursery, primary school, NHS facility and recreation ground (Carter

Hall Road, Carter Hall Lane). Children often frequent the area unsupervised (often on bicycles, scooters etc.), and being children, do not exercise much road-sense.

- 4.13. There already exists an extraordinary risk of a serious accident in this area, which can only be exacerbated by proposed development and the increased traffic it will introduce, which includes the potential for an access road on Carter Hall Lane (discussed in section 5 of this statement).
- 4.14. The increased noise and air pollution for residents also appears to have been overlooked and should not be underestimated, especially given the pre-existing health inequalities in the S12 area (discussed in section 6 of this statement).
- 4.15. We submit that existing road infrastructure cannot absorb the additional traffic which will be generated by the site, without seriously compromising safety and liveability. We consider that the Plan demonstrates a failure to understand and address potential impacts on the transport network as required by para 109(c) of the Framework.²⁵ Development of the site will significantly exacerbate existing problems in the local road transport network in terms of capacity, congestion and highway safety in the manner prescribed in para 115(c) of the Framework.²⁶ There have been no consideration of how these impacts can be successfully mitigated. Notwithstanding, we submit that the issues present an unacceptably severe impact on highway safety and the local road network, such that they must be refused in accordance with paragraph 116 of the Framework.

Air pollution

- 4.16. Reported air pollution on White Lane already exceed World Health Organization (WHO) guidelines, with NO₂ levels at 24–30 µg/m³ and PM2.5 nearing 10 µg/m³ (calculated using DEFRA's Pollution Climate Mapping model) double the safe threshold of 5 µg/m³.²⁷ The new sites' estimated 720

²⁵ NPPF, PARA 109(c)

²⁶ Ibid, para 115(d)

²⁷ World Health Organization, 'WHO global air quality guidelines. Particulate matter (PM2.5 and PM10), ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide.' (World Health Organization, 2021).

additional cars²⁸ would add approximately 9 metric tons of CO₂, up to 1.2 kg of NO_x, and 100 g of PM2.5 daily.²⁹

- 4.17. Children are especially vulnerable to air pollution.³⁰ The Academy, Nursery and Hub are situated just 125-160m from White Lane, well exceeding the 300–500 metre high-risk zone identified by the HEI Special Report (2010)³¹ as most affected by vehicle emissions. This proximity places young children in a scientifically recognised exposure zone. NICE Guideline NG70 (2017) similarly recommends that schools and nurseries are not sited in areas with high levels of pollution.³² It is estimated that the existing green belt may reduce NO₂ and PM2.5 concentrations by up to 40% and 60% respectively³³. We submit that the proposed reduction of the green belt in S12 has potential to significantly increase exposure to harmful pollutants for the approx. 500 children attending the Academy and Nursery, as well as the wider S12 population.
- 4.18. Two areas close to the site (LSOAs 062C and 076E) fall into decile 2 of the Index of Multiple Deprivation³⁴, placing them among the bottom 20% nationally. There are known health vulnerabilities within these communities (26% of S12 residents met the Equality Act definition of disabled according to

²⁸ Office for National Statistics, 'Census 2021: Car or van availability (TS045) — total number of cars in Sheffield' (Office for National Statistics, 28 March 2023).

²⁹ Sheffield Health and Wellbeing Board, 'Fair and Healthy Sheffield Plan' (Sheffield Health and Wellbeing Board, 2022) <<https://health-wellbeing.sheffield.gov.uk/fair-healthy-sheffield-plan>> accessed 19 August 2025

³⁰ European Environment Agency, 'Air pollution and children's health' (European Environment Agency, 24 April 2023) <https://www.eea.europa.eu/en/analysis/publications/air-pollution-and-childrens-health> accessed 19 August 2025

³¹ Health Effects Institute, 'Traffic-Related Air Pollution: A Critical Review of the Literature on Emissions, Exposure, and Health Effects' (Health Effects Institute, 17, 2010) <https://www.healtheffects.org/system/files/SR17TrafficReview.pdf> p720

³² Paragraph 1.2.2 [Recommendations | Air pollution: outdoor air quality and health | Guidance | NICE](#) National Institute for Health and Care Excellence 'Air pollution: outdoor air quality and health - NICE guideline NG70' (NICE, 30 June 2027) <<https://www.nice.org.uk/guidance/ng70/chapter/Recommendations#planning>> accessed 18th August 2025, para 1.1.2

³³ COMEAP (2018). Air Pollution and Mortality: Estimating the Impact of Changes in Air Pollution.

³⁴ UK Parliament, 'Census 2021: Constituency data: Indices of deprivation' (House of Commons Library, 4 July 2024), <<https://commonslibrary.parliament.uk/constituency-data-indices-of-deprivation/>> accessed 17 August.

the 2021 census)³⁵ and development of the site will likely reduce air quality further, placing disabled and vulnerable residents at increased risk.

- 4.19. As explored in the following sections of this statement, the absence of site-specific Health Impact Assessment represents yet another failure to account for the disproportionate burden placed on residents of the S12 community, and especially children, those with disabilities, and low-income households.
- 4.20. We submit that development of the site is inconsistent with the Council's Fair and Health Sheffield Plan which commits to reducing health inequalities and undermines the aims of its Clean Air Strategy and the duties to promote health and tackle climate change, as required by sections 8 and 14 and the Framework.
- 4.21. This situation in S12 contrasts with that in Totley, a more affluent area in the South West of the city, which has significantly lower levels of Nitrogen Dioxide.³⁶ Notably, previously proposed green belt development in Totley was discontinued.

5. ACCESS

- 5.1. There are no viable access points to the site and any attempts to facilitate access would be inconsistent with the requirements of the Framework (most notably paragraphs 115-117) and/or other legal, regulatory and policy provisions, including: Sheffield Unitary Development plan (1998), BE9 and Sheffield Core Strategy (2009), CS53 & CS66; and Draft Sheffield Local Plan Policies: T1 (Delivering Sustainable Transport); HW1 (Health Neighbourhoods); and IN1 (Infrastructure Delivery).
- 5.2. The issues of traffic, congestion and road safety in relation to the local road network are detailed in section 4. We submit that these issues alone are compelling and preclude any reasonable prospect of access to the site via White Lane. These issues are, however, compounded by the lack of any viable access to the SS19 site.

Access via White Lane

- 5.3. There is currently no vehicular access to the site from White Lane.

³⁵ UK Parliament, '*Census 2021: Constituency data: Disability*' (House of Commons Library, 30 October 2024), <<https://commonslibrary.parliament.uk/constituency-data-disability/>> accessed 17 August.

³⁶ *Air Pollution Trend and Analysis around Carter Hall Road, Sheffield, S12 3HS (site SS19) v Air Pollution Trend and Analysis around Totley Hall Croft, Sheffield, S17 4BE (site S03007)*

- 5.4. We submit that access via White Lane would be inconsistent with the Framework's requirement for: (a) '*safe and suitable access*' (para 115(b)); and (b) the refusal of developments which present an '*unacceptable impact on highway safety*' or severe residual impacts on the road network (para 116).
- 5.5. In addition to those issues raised in section 4 (traffic and road safety), the South Yorkshire Supertram extends for the majority of White Lane and it's infrastructure likely inhibits any realistic proposal for access to the site via White Lane; and any disruption to the Supertram Network would further contravene paragraphs 115(b) and 116 of the Framework, as well as the requirements of paragraph 117(a), which seeks to promote access to high quality public transport.
- 5.6. Further, the border between White Lane and the site is lined with ancient hedgerow. Hedgerow is considered a '*priority habitat*' for the purposes of s 41 of the Natural Environment and Rural Communities Act 2006 and is protected under The Hedgerows Regulations 1997. The Framework contains a duty to '*promote conservation, restoration and enhancement of priority habitats*' (para 192(b)). The Council's own Policy NE1 requires protection of green infrastructure. We submit that destruction of these hedgerows to enable access to the site would be inconsistent with the purposes of the 1997 Regulations, 2006 Act, the Framework and the Council's Local Plan Policy.

Access via Carter Hall Lane

- 5.7. Carter Hall Lane is accessible only from the junction at Charnock Dale Road, which is situated a short distance from the junction with Charnock Grove/Carter Hall Road. Carter Hall Lane is a single-track public bridleway, which appears on both Sheffield City Council and NEDDC's Definitive Maps (labelled 'ECK/19' on the Sheffield City Council and 'Eckington BW 19' on the North East Derbyshire District Council mapping portals). It is an offence to drive a mechanically propelled vehicle on Carter Hall Lane, except for access to land³⁷. Carter Hall Lane is not maintainable at the public expense.^{38*} There is no continuous pedestrian footpath on Carter Hall Lane.

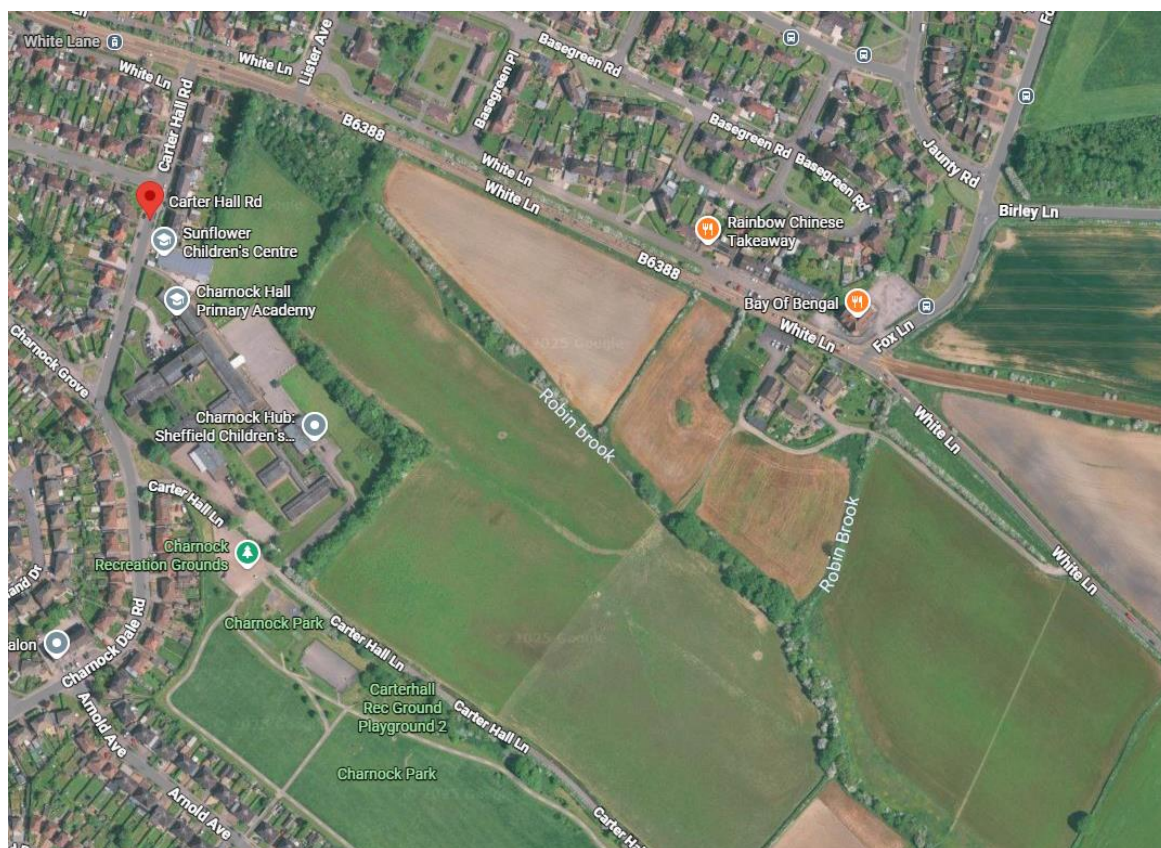
³⁷ Road Traffic Act 1988, s 31(1)(b)

³⁸ GeoPlace, 'Find my Street Map - Carter Hall Lane' (Find My Street, 2025)

<<https://www.findmystreet.co.uk/map>> accessed 24 August 2025. *Find my street mapping portal, [Home - FindMyStreet](#), which shows every street in England and Wales that's held in the National Street Gazetteer. The data is created and maintained by local authorities, collected, and managed centrally by GeoPlace.

- 5.8. Immediately left of the Charnock Dale Road/Carter Hall Lane Junction, is a site housing Charnock Hall Primary Academy (hereafter **“the Academy”**, please note this also includes a site used by Hugi Nest, an organisation supporting children with specialist needs) and Charnock Hub: Sheffield Children's Hospital Speech and Language Therapy³⁹ (hereafter **“the Hub”**). Situated immediately adjacent to the school on Carter Hall Road is Sunflower Children's Centre (hereafter **“the nursery”**) (see **Figure 6**). The Academy and the Hub have multiple access points on both Carter Hall Lane and Carter Hall Road (see **Figure 7**).

Figure 6



³⁹ Sheffield Children's NHS Foundation Trust, 'My speech and language therapy appointment at Charnock Hall' (A Sheffield Children's Hospital NHS Foundation Trust facility, 2025) <[Speech and Language Therapy Service - Sheffield Children's NHS Foundation Trust](#)> accessed 19 August 2025.

Figure 7



- 5.9. Immediately right of the of the Charnock Dale Road/Carter Hall Lane Junction are private residential dwellings, which are accessible from the front (via Charnock Dale Road) and rear (via Carter Hall Lane) (see **Figure 8**). Immediately behind the residential dwellings is Charnock Recreation Ground. The recreation ground is accessible to the public at two points on Carter Hall Lane; via the car park and via a gate further down the lane (see **Figures 9 and 10**).

Figure 8



Figure 9



Figure 10



- 5.10. Carter Hall Lane is intersected by the NEDDC boundary (see **Figure 11**). Beyond this point is access to residential dwellings (some of which are dual purposed for business use), farmland, woodland and Carter Hall Fisheries. The Severn Trent, Gleadless Water Booster Power Station is also situated on Carter Hall Lane (a key piece of infrastructure for the area's water supply).

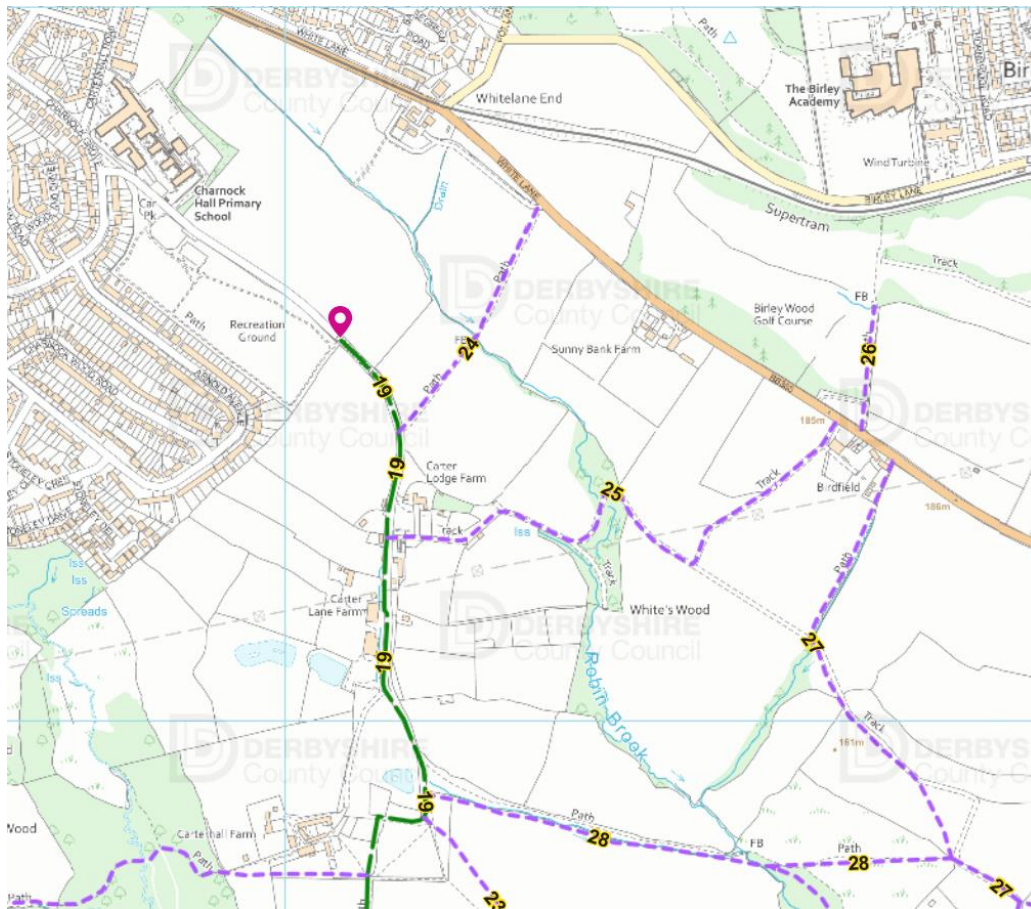
Figure 11

(The Sheffield/NEDDC county boundary is marked by the dashed orange line)



- 5.11. Carter Hall Lane provides access to various registered public rights of way (see **Figure 12**). These public rights of way are frequently used and provide safe alternative routes for pedestrians, connecting Charnock and surrounding areas with the neighbouring areas of Birley, High Lane and Ridgeway. Many pedestrians consider these routes preferable to the single narrow footpath running adjacent to White Lane, which for the reasons outlined above, is a serious safety concern.

Figure 12



- 5.12. The most flagrant objection to access via Carter Hall Lane is the safety of children, parents and members of staff attending the Academy, the Hub, Nursery and recreation ground. Notably Carter Hall Lane is used as a point of access for children entering and exiting the school premises and children use the Lane to queue. The recreation ground car park has also been used in the past as a fire assembly point, which requires safe access via Carter Hall Lane.
- 5.13. The previous section of this statement has set out in detail the traffic and road safety issues affecting Charnock Dale Road and Carter Hall Road (among others) as against the Framework. We submit that development of Carter Hall Lane as an access site would likewise contravene paras 115(b) and (c) as above, and further fall short of the duty to prioritise pedestrian and cycle movements as required by para 117(a). We likewise submit that development of Carter Hall Lane as an access road should be refused in accordance with para 116 of the Framework.

- 5.14. To repurpose any part of Carter Hall Lane to facilitate access to the site would exacerbate these issues resulting in a severe and unacceptable escalation of the risk to pedestrians in the area, chiefly children, which is incompatible with the Framework requirement that developments are ‘*safe and accessible*’ (para 96(c)), and any commonsense approach. These issues are at present, somewhat curtailed by Carter Hall Lane’s present status as a public bridleway, which forbids vehicular access, save for access.
- 5.15. Another objection is that access via Carter Hall Lane is inconsistent with para 105 of the Framework which requires the protection of public rights of way and enhancement of access, including taking opportunities to provide better facilities. We also point to the commitment to maintaining public rights of way and access to the wider green belt, as per para 4.27 of the Plan. We submit that any development of Carter Hall Lane as an access road would fly in the face of these principles and would prohibit access via public rights of way in a manner which cannot be compensated or mitigated.
- 5.16. A further objection is that access via Carter Hall Lane is likely to impede access to the Academy, the Hub, the recreation ground, private residential dwellings (on Charnock Dale Road and Carter Hall Road) and other infrastructure; all of which are accessible via Carter Hall Lane. This is inconsistent with the spirit of paragraphs 96 to 108 of the Framework generally.
- 5.17. In addition, the Framework requires that developments allow access by service and emergency vehicles (para 117(d)). The Building Regulations standards, requires any street or private drive forming part of such a fire access way to be no less than 3.7m wide between kerb⁴⁰. Much of Carter Hall Lane does not comply with this requirement and is not achievable without wholly disproportionate modifications, which for the reasons already set out is unviable.
- 5.18. Carter Hall Lane is likewise lined at either side by hedgerow and the points raised at paragraph 5.6 equally apply.

6. INFRASTRUCTURE AND SERVICES

Education provision

- 6.1. We submit that the education infrastructure modelling for S12 is flawed and inadequate. The housing trajectory relied upon is unrealistic and relies disproportionately on the assumption that the site will be delivered after the

⁴⁰ Building Regulations Approved Document B Volume 1: Dwellinghouses

recent decline in birth rates, when there is a temporary surplus of school places.

- 6.2. A more accurate picture is that by 2029, the site will generate approx. 224 school-aged children, including 30 early years, 121 primary, and 73 secondary pupils.⁴¹ Inconceivably, however, no consideration has been given to the reality that education providers in the S12 area are already operating at near or full capacity.⁴²

Primary and secondary education

- 6.3. The Sunflower Children's Centre (the nursery) is the nearest early years provider to the site. The Centre is oversubscribed and unlikely to be able to absorb the projected intake of children.⁴³
- 6.4. The Academy, the nearest primary school, was oversubscribed by 33% for academic year 2025/26⁴⁴, with its roll expected to increase by 30%.⁴⁵
- 6.5. Birley Academy, the closest secondary school to the SS19 site, is at 95% capacity. It faces persistent barriers to attainment and progression, with 36% of pupils eligible for Free School Meals and 22% in receipt of send support.⁴⁶ There is currently no provision in the Plan for an additional secondary school in S12.

⁴¹ GOV.UK, 'Create your own tables on pupil yield from housing developments' (DfE's pupil yield calculator, 2022) <<https://explore-education-statistics.service.gov.uk/data-tables/pupil-yield-from-housing-developments/2022?subjectId=4656a80b-f047-4b60-7b9a-08dbaf818119>> accessed 19 August 2025

⁴² IBID

⁴³ Ofsted, 'Inspection of Sunflower Children's Centre 2021', (Ofsted, 2021) <<https://files.ofsted.gov.uk/v1/file/50177755>>

⁴⁴ Sheffield City Council, 'Entrance into Reception 2025/25: Oversubscribed Schools' (Sheffield City Council, 2025) https://www.google.com/url?q=https://www.sheffield.gov.uk/sites/default/files/2025-04/oversubscribed_infant_and_primary_schools_2025.pdf&sa=D&source=docs&ust=1756123907638923&usg=AOvVaw0GvJypYPE3sMNdLfBe3uns

⁴⁵ Gov.UK, 'Charnock Hall Primary Academy' (Get Information about Schools, July 2025) <<https://get-information-schools.service.gov.uk/Establishments/Establishment/Details/143970>> accessed 15 August 2025

⁴⁶ Gov.UK, 'The Birley Academy' (Compare school and college performance in England, July 2025) <<https://www.compare-school-performance.service.gov.uk/school/143963/the-birley-academy/secondary>> accessed 15 August 2025

- 6.6. These pressures must be viewed in the context of a shortage of 350 year 7 places, which is expected to persist until 2030⁴⁷ and is disproportionately affecting South East Sheffield.

Post-16 education

- 6.7. There is no post-16 education provision within S12 or the wider South-East area. Pupils are currently forced to travel considerable distances to access sixth form or college places. S12 ranks in quintile 2 of POLAR4 and TUNDRA MSOA⁴⁸ indicating the area has some of the lowest levels of higher education participation and progression, which could be attributed to the lack of available post-16 opportunity.
- 6.8. At Birley Academy, 60% of Year 11 pupils transition to further education college (as opposed to sixth form)⁴⁹, nearly double the national average.⁵⁰ Birley leavers are therefore forced to attend educational providers such as the Sheffield College, which has been judged ‘*well below average*’, with an average Level 3 result of D, with only 53% progressing to higher education or training.⁵¹
- 6.9. The present situation is at odds with the Council’s duty to promote participation by ensuring that young people are not prevented from participating in education because of the cost or availability of transport to their education or training.⁵² The situation can only be exacerbated by a

⁴⁷ Sheffield City Council. ‘Infrastructure Delivery Plan Part 2: Infrastructure Schedule Addendum’ (Sheffield City Council, May 2025) <https://017f5bf8-ff4d-415b-be58-79dae2836c33.usrfiles.com/ugd/017f5b_a48ec4aca84e4953a1ecd7f75619d79d.pdf> accessed 15 August 2025

⁴⁸ Office for Students, ‘Access and Participation Dashboard’ (Office for Students, 2023) <<https://www.officeforstudents.org.uk/data-and-analysis/access-and-participation-data-dashboard/about-the-data-dashboard/get-the-data/>> accessed 15 August 2025

⁴⁹ Gov.UK, ‘The Birley Academy’ (Compare school and college performance in England, July 2025) <<https://www.compare-school-performance.service.gov.uk/school/143963/the-birley-academy/secondary>> accessed 15 August 2025

⁵⁰ Department for Education, ‘Key Stage 4 Destination Measures (2022/23 cohort)’ (Explore education statistics, 2023) <<https://explore-education-statistics.service.gov.uk/data-tables/fast-track/8bc2a4cd-5942-4fd9-ec32-08dcdd324466>> accessed 15 August 2025

⁵¹ Gov.UK, ‘The Sheffield College’ (Compare school and college performance in England, July 2025) <<https://www.compare-school-performance.service.gov.uk/school/130531/the-sheffield-college/16-to-18/advanced-level-qualifications>> accessed 15 August 2025

⁵² Department for Education, ‘Participation of young people in education, employment or training Statutory guidance for local authorities.’ (Department for Education, 2024), <https://assets.publishing.service.gov.uk/media/660e971663b7f8001fde187f/Participation_of_young_people_in_education_employment_or_training.pdf> p14, para 44

significant increase in competition for places generated by the proposed SS19 site.

- 6.10. We submit that the plan fails to demonstrate that adequate education provision across all levels of education provision exists. This is inconsistent with the requirements of the Framework, which provides that '*sufficient choice of early years, school and post-16 places are available to meet the needs of existing and new communities*'.⁵³ It is also inconsistent with the statutory duty to ensure sufficient school places imposed by section 14 of the Education Act 1996.
- 6.11. How then, we ask, can S12 education providers be expected to absorb the increased demand generated by the construction of 300+ homes on White Lane and a total of 1,000 homes across S12? The inevitable outcome is a deepening of existing education provision inequalities for pupils living in S12, and an unacceptable increase in the risk of poor life outcomes, when compared with peers in better-served areas.

The Academy – heightened concerns

Health, safety and risk

- 6.12. The SS19 site presents a unique predicament given its proximity to the Academy, Hub and nursery. Despite this, the Council has failed to carry out any site-specific Health and Safety or Environmental risk assessment. This is an unacceptable and dangerous omission, which is contrary to the precautionary planning principle and the Framework, which requires the anticipatory action to address hazards (para 102(a)).
- 6.13. The Plan and associated documentation contain no evidence of how risks (including noise, dust, vibration, air pollution, toxic and hazardous substances, traffic, site access) from nearby construction will be mitigated to prevent harm to children using these facilities daily. We point to para 224(c) of the Framework which specifically identifies a duty to minimise noise, dust and particle emissions (albeit in the context of mineral extraction), which we say applies here.
- 6.14. No consideration has been given to the implementation of protective measures for children with complex and special education needs, who are likely to be disproportionately affected by the sensory and environmental

⁵³ NPPF, 100

impacts of large-scale construction, in addition to the disruption to their regular educational setting. We again draw attention to the Hugi Nest organisation, which is based on the Academy site ([Our Centres | Hugi Hub AP](#)), and as we understand, frequently traverse Carter Hall Lane.

- 6.15. The risks associated with construction activities in school grounds have already been demonstrated at this site. A fire in around 2000 caused by maintenance work on the school roof resulted in the evacuation of pupils to the nearby recreation ground, which required access via Carter Hall Lane. Without adequate risk assessment, it is entirely plausible that an event of this nature could happen again (with a potentially tragic outcome). In such an event, it is likely that unimpeded access across Carter Hall Lane would be required to ensure a safe evacuation, which would clearly be compromised by the use of the Lane as an access road.

Impact on attainment

- 6.16. The proximity of the site to the Academy poses a significant risk of disruption to education, which may harm academic attainment and prospects. Research has shown that noise levels exceeding 65dB reduces reading comprehension, verbal memory, and academic achievement in younger children.⁵⁴ Construction site noise frequently exceeds 85dB⁵⁵ which has the potential to damage to a child's hearing long-term but also risks placing children at a significant disadvantage, especially during critical KS2 SATs years. These results determine secondary school placement, meaning impacts could have serious implications for future education provision and prospects. Given the size of the proposed development, such noise intrusion is likely to be constant.
- 6.17. The impact of nearby construction is not limited to academic studies, and there has similarly been a failure to consider how outdoor activities, physical education and break times will be affected, and the knock-on effect this may have on the physical and mental wellbeing of children.
- 6.18. We submit that the failure to implement a site-specific risk assessment including mitigation strategies is inconsistent with para 198 of the

⁵⁴ Flavia Gheller and others, 'The Effects of Noise on Children's Cognitive Performance: A Systematic Review' [2024] 55(8-10) Environment and Behavior <<https://doi.org/10.1177/00139165241245823>> accessed 19 August 2025

⁵⁵ Health and Safety Executive. 'Assessing noise risks for larger / more dynamic sites' (HSE, 2025) <<https://www.hse.gov.uk/construction/healthrisks/physical-ill-health-risks/assessing-noise.htm>> accessed 18 August 2025

Framework, which imposes a duty to minimise the adverse impacts of noise pollution on health and quality of life.

Healthcare provision

- 6.19. We submit that development of the site, which is likely to bring an influx of 1,000+ residents (based on 304 x 3 bedroom houses each containing 3.5 residents) into the S12 area, will apply unsustainable pressures to existing healthcare services (which are already critically overstretched), resulting in reduced access for existing and new residents alike, whilst widening existing health inequalities.
- 6.20. We consider this is inconsistent with the Framework which contains duties to promote good health, prevent ill-health and reduce health inequalities in deprived communities (para 96(c)) and the wider duty imposed by the Public Sector Equality Duty⁵⁶.

GP services

- 6.21. The SS19 site development is expected to introduce at least 1,000 residents to the S12 community. This will generate demand for approximately 6,000 GP appointments annually⁵⁷. The planned developments in S12 put forth by the Plan (SS19- 304 homes, Jaunty Avenue- 75 homes), along with the ongoing SwaN development⁵⁸ of over 300 homes are set to introduce around 2,500 new residents who would require a further 15,000 GP appointments annually.
- 6.22. The above estimates do not consider that two of S12's most deprived Lower Layer Super Output Areas (LSOAs) are proximate to the SS19 site, nor that South East Sheffield has poorer health outcomes, compared with other areas of the city; for example, the more affluent Sheffield Hallam constituency. **Table 1** one on the next page demonstrates the increased prevalence of various conditions in S12, as compared to Sheffield Hallam⁵⁹.

⁵⁶ Equality Act 2010, s 149

⁵⁷ Stuart Hoddinott, 'General practice across England: The number and type of appointments are related to patient satisfaction' (Institute for Government, 21 April 2025).
<<https://www.instituteforgovernment.org.uk/publication/performance-tracker-local/general-practice-england/appointments-satisfaction>> accessed 12 August 2025

⁵⁸ BSP Consulting, Scowerdons Weakland Newstead Estates (SWaN) (BSP Consulting, 2025)
<<https://bsp-consulting.co.uk/projects/scowerdons-weakland-newstead-swan-estates/>> accessed 12 August 2025

⁵⁹ UK Parliament, 'Constituency data: health conditions' (House of Commons Library, 4 July 2024), <<https://commonslibrary.parliament.uk/constituency-data-how-healthy-is-your-area/>> accessed 17 August

Table 1 The increased prevalence of various conditions in S12, as compared to Sheffield Hallam

Health condition	S12	Sheffield Hallam
Asthma	8.1%	6.6%
COPD	2.54%	1.23%
Depression	17%	10%

- 6.23. A full-time GP typically delivers around 4,500 appointments annually⁶⁰. Analysis by The Health Foundation has shown that GP practices in deprived areas face increased patient workloads of 15%⁶¹. Increased demand from the SS19 site alone would require an increase in GP workloads in the region of 42% (i.e., an increase from 4,500 to 6,400 appointments per GP), with demand for the wider S12 community likewise increasing exponentially. These realities appear to have been entirely overlooked by infrastructure modelling for the SS19 site, with the only mitigation proposed being to *‘reconfigure or create capacity for one additional consultation room’* within an existing surgery in Townships 2 Primary Care Network (PCN)⁶².
- 6.24. We note that no site-specific Health Impact Assessment (HIA) has been conducted, despite guidance in paragraph 7.2 of Public Health England’s Health Impact Assessment in Spatial Planning (2020)⁶³, which recommends undertaking an assessment to reduce health inequalities. The guidance highlights in paragraph 3.12 that local authorities can use socio-economic indicators as a trigger for conducting a HIA and in 3.13 lists ‘sites in areas of high deprivation’ as an example for triggering an assessment in the local plans of some local authorities.

⁶⁰ Stuart Hoddinott, ‘General practice across England: The number and type of appointments are related to patient satisfaction’ (Institute for Government, 21 April 2025).

<<https://www.instituteforgovernment.org.uk/publication/performance-tracker-local/general-practice-england/appointments-satisfaction>> accessed 12 August 2025

⁶¹ The Health Foundation, ‘Mounting cycle of pressures on GPs in deprived areas’ (The Health Foundation, 2019) <https://www.health.org.uk/press-office/press-releases/mounting-cycle-of-pressures-on-gps-in-deprived-areas> accessed 17 August.

⁶² Sheffield City Council. ‘Infrastructure Delivery Plan Part 2: Infrastructure Schedule Addendum’ (Sheffield City Council, May 2025) <https://017f5bf8-ff4d-415b-be58-79dae2836c33.usrfiles.com/ugd/017f5b_a48ec4aca84e4953a1ecd7f75619d79d.pdf> accessed 15 August 2025, p27

⁶³ Public Health England, ‘Health Impact Assessment in spatial planning’ (Gov.UK, October 2020) <https://www.gov.uk/government/publications/health-impact-assessment-in-spatial-planning> accessed 15 August 2025

- 6.25. We are concerned that these oversights risk deepening health inequalities, (including for those with protected characteristics under the Equality Act 2010) and fall short of the duties imposed by the Health and Social Care Act 2012, which requires the reduction of health inequalities and the improvement of public health;⁶⁴ as well as the Framework duties to prevent ill-health and reduce health inequalities between the most and least deprived communities (para 96(c)); and to ensure faster delivery of public service infrastructure⁶⁵. These duties cannot be performed if primary care infrastructure is overwhelmed by increased demand imposed by the Plan.

Dental care

- 6.26. This Group has contacted 4 local dental surgeries:

- Hurlfield Dental Practice, S12 2SD
- Hackenthorpe Dental Health Centre, S12 4LB
- My Dentist, S12 4WH
- DL Dental, S12 2AQ

- 6.27. From the above list, only Hurlfield Dental Practice accepts NHS patients and there is currently a 2-3 year waiting list. It is self-evident that dental care provision in S12 is severely limited and the significant increase to the area's population that is being proposed cannot be supported by existing services. This is likewise inconsistent with the Framework requirements set out above.

Public Transport

- 6.28. The scale of growth envisaged at the site and S12 generally will place substantial pressure on an already limited and overstretched public transport network.
- 6.29. S12 is served by bus routes (principally the 120, 51, 252, 8, and 41/42), and Blue Route tram (which is full at White Lane towards the city centre in peak hours) and a minimal Purple Route service (hourly). Existing services experience significant peak-time congestion, especially along Ridgeway Road, White Lane, and City Road, City Road, Norton Avenue leading to Ridgeway Road are recognised pinch points in the Council's own transport assessments⁶⁶. The Supertram service is also frequently affected by

⁶⁴ Health and Social Care Act 2012, s 4, 12

⁶⁵ Ibid, para 101

⁶⁶ Systra, 'Transport Assessment: Report on Local Road Network Impacts and Potential Mitigation' (Sheffield Local Plan, May 2025) <https://haveyoursay.sheffield.gov.uk/sheffield-plan-proposed-additional-site-allocations?tool=survey_> accessed 12 August 2025

outages, as a result of track maintenance, mechanical failures and severe weather disruption, all of which hinder the reliability of the service for residents, who in turn have to rely on private vehicles, adding further to the traffic pressures outlined elsewhere in this statement.

- 6.30. We note that Chartered Institution of Highways & Transportation (CIHT)⁶⁷ ⁶⁸ and Department for Transport ⁶⁹ suggests that public transport stops should be located within 400m of new residential areas and run every 12 mins or better please see **Figure 13**. to ensure convenience and reduce emissions. Furthermore, CIHT and Department of Transport suggest that the regularity of services is important with *'frequency minimum every 20 minutes in urban areas, with 10 minutes the target, and 5–6 minutes the target for core routes and corridors.'*⁷⁰ Whilst developed for urban settings the guidance is designed to be applied to suburban such as SS19. At present none of the bus/tram services which service SS19 hit this target of 10 mins and 400m.

Figure 13. Recommended Maximum Walking Time to Bus Stops

Situation	Maximum walking distance
Core bus corridors with two or more high-frequency services	500 metres
Single high-frequency routes (every 12 minutes or better)	400 metres
Less frequent routes	300 metres
Town/city centres	250 metres

- 6.31. There are, however, only two local bus services (8 and 8a buses), which meet the distance recommendations, thereby unfairly disadvantaging those with limited physical mobility. However, the 8 and 8a fails to meet the frequency recommendations whilst the 51 service and tram meets the frequency requirements but exceeds the recommended 400m distance. The 252 service meets neither the distance nor frequency recommendations.

⁶⁷ Chartered Institution of Highways & Transportation, *'Buses in Urban Developments'* (Chartered Institution of Highways & Transportation, January 2018)

https://www.ciht.org.uk/media/4459/buses_ua_tp_full_version_v5.pdf accessed 20 August 2025.

⁶⁸ Chartered Institution of Highways & Transportation, *'Planning for Walking'* (Chartered Institution of Highways & Transportation, April 2015) https://www.ciht.org.uk/media/4465/planning_for_walking_-_long_-_april_2015.pdf

⁶⁹ Department for Transport, *'Manual For Streets'* (Department for Transport, 2007)

<https://assets.publishing.service.gov.uk/media/5a7e0035ed915d74e6223743/pdfmanforstreets.pdf> accessed 20 August 2025.

⁷⁰ Chartered Institution of Highways & Transportation, *'Buses in Urban Developments'* (Chartered Institution of Highways & Transportation, January 2018)

https://www.ciht.org.uk/media/4459/buses_ua_tp_full_version_v5.pdf accessed 20 August 2025.

- 6.32. We point out that the Purple Route service is unlikely to be able to satisfy the public transport needs of the nearby proposed Aerodrome site (SS17) due to the limited hourly service, with the nearest alternative stops being at Gleadless Townend or White Lane (significantly more than the recommended 400m).
- 6.33. The S12 area has no train connectivity.
- 6.34. We submit that the Plan fails in its duty to promote sustainable transport, provide access to high quality public transport and reduce reliance on private vehicles as required by paras 109(e) and 117(a) of the Framework.

Fire and Rescue Services

- 6.35. Data from the Community Risk Management Plan 2025–2028 (CRMP) and South Yorkshire Fire and Rescue’s (SYFR) Fire Cover Review 2025 confirms that South Yorkshire Fire & Rescue is already operating at the upper end of the national response time targets for high, medium and low risk incidents.⁷¹

Figure 14 – South Yorkshire Fire and Rescue Response Times

Community risk	Incident category risk		
	High	Medium	Low
Target	7 minutes	9 minutes	11 minutes
High	65% 06:32 mins	74% 08:17 mins	89% 07:20 mins
Target	9 minutes	11 minutes	13 minutes
Medium	78% 07:15 mins	81% 08:36 mins	92% 07:34 mins
Target	11 minutes	13 minutes	15 minutes
Low	86% 07:38 mins	86% 09:01 mins	94% 07:40 mins

- 6.36. The closest fire station to the site (approx. 2km) is Birley Moor Fire Station, S20 5BB. This is a station with one wholetime crewed appliance and one “on-call” appliance manned by a small subset of firefighters who live or work within a 5-minute travel radius. This leaves limited resilience, particularly if the wholetime appliance is already deployed.

⁷¹ South Yorkshire Fire and Rescue, *Our Plan: Community Risk Management Plan 2025-2028* (South Yorkshire Fire and Rescue, 2024) <<https://www.syfire.gov.uk/wp-content/uploads/2024/11/SYFR-Draft-CRMP-2528.pdf>>

- 6.37. The CRMP clearly states that currently there are no plans to increase either the number of fire stations or number of fire appliances within the 2025–2028 CRMP period due to financial viability. Even in the independent modelled scenarios, increasing on-call cover to an unrealistic 90% only improves Sheffield-wide average response times by around 6 seconds, which SYFR itself describes as negligible.⁷²
- 6.38. There is no evidence within the CRMP that any Sheffield Plan allocations (including SS19) have been taken into consideration. The CRMP statements illustrate SYFR themselves would not be able to fund extra fire cover without significant investment. This omission is reinforced by the Local Plan evidence base: the Integrated Impact Assessment and the Appropriate Assessment (2025), which makes no assessment of fire cover capacity for the new site allocations, including SS19.⁷³
- 6.39. Meanwhile, the Proposed Additional Site Allocations (Feb 2025) identify further growth land, adding more pressure on Birley Moor and Parkway stations. Yet no infrastructure baseline or funding pathway is set out for SYFR, despite the Framework requirement that plans ‘*align growth and infrastructure*’ (para 11(a)). We submit that fire cover represents a critical constraint which has been overlooked in the planning process, further evidencing a lack of soundness.

Water Supply

- 6.40. Since October 2024, there have been seven documented water supply failures in the S12 3 area. These are evidenced by SMS alerts sent to residents of the Charnock area on the following dates:
- 21 November 2024
 - 16 December 2024
 - 12 March 2025
 - 28 April 2025
 - 29 April 2025
 - 30 April 2025
 - 3 July 2025

⁷² IBID

⁷³ South Yorkshire Fire and Rescue, ‘Fire Cover Review’ (South Yorkshire Fire and Rescue, 2025) <https://www.syfire.gov.uk/wp-content/uploads/2025/03/SYFR_Fire_Cover_Review_2025.pdf> accessed 12 August 2025

- 6.41. The issues range from a complete loss of supply to low pressure and pump malfunctions. Seven Trent have not been engaged in the process however, much of Charnock and S12 is supplied by Seven Trent and suffers supply issues and therefore we feel should be engaged to mitigate possible issues.⁷⁴ The existing infrastructure has demonstrated an inability to adequately service existing homes in accordance with the duty imposed by section 37 of the Water Industry Act 1991. Any increase in demand is likely to further reduce the resilience and reliability of the water supply to the Charnock area.
- 6.42. Access to a clean and safe water supply is a basic right. The Framework imposes a duty to make sufficient provision for water supply (para 20(c)). The Sheffield Draft Local Plan Policy (Infrastructure Delivery) similarly stipulates that new developments must only proceed where essential utilities are available. The Plan, however, fails to acknowledge and mitigate existing supply issues, which are likely to be intensified by the addition of 300+ homes.
- 6.43. Severn Trent have declined the opportunity to comment substantively on the Plans in response to questions posed by the Group.

Wastewater and sewerage

- 6.44. The sewerage system in S12 is already under unsustainable pressure, demonstrated by frequent storm overflow discharges for the past 12 months. These include:
- Seagrave Crescent: 29 spills totalling 54.75 hours into Shire Brook
 - Bridge Inn Ford: 37 times for a total of 81.50 hours, discharging into The Moss
 - Birley Vale Combined Sewer Overflow: 36 spills totalling 120.5 hours into Shire Brook
 - Alport Road: 71 spills totalling 123.5 hours into a tributary of Shire Brook (cause cited as insufficient hydraulic capacity)
 - Normanton Springs: 39 spills totalling 46.5 hours into Shire Brook — despite the monitor being operational only 86.94% of the year

⁷⁴ Sheffield City Council. 'Infrastructure Delivery Plan Part 2: Infrastructure Schedule Addendum' (Sheffield City Council, May 2025) <https://017f5bf8-ff4d-415b-be58-79dae2836c33.usrfiles.com/ugd/017f5b_a48ec4aca84e4953a1ecd7f75619d79d.pdf> accessed 15 August 2025

- 6.45. Other areas within S12 are notably less affected than S12 3, which is suggestive of chronic underlying issues in the existing network. We are concerned that the inevitable increase in wastewater (as well as surface water) generated by 300+ new homes will overwhelm the network's safe operating limits, and the Plan includes no proposals for deliverable upgrades to the system. Yorkshire Water's assessment suggests the system will struggle to cope '*Records show evidence of some capacity constraints in network close to site*'⁷⁵.
- 6.46. The Framework imposes a duty to make sufficient provision for wastewater infrastructure (para 20(b)). The Local Plan Draft Policy (Infrastructure Delivery) similarly requires that new housing only proceeds where utilities such as foul drainage are '*safe, adequate and deliverable*'. There are various other legislative frameworks which impose duties in relation to wastewater and sewage, which are unnecessary to repeat here.

7. ENVIRONMENTAL / HERITAGE

- 7.1. The impact of the proposed development on the area's ecology and heritage will be grave.
- 7.2. The site is of high and irreplaceable ecological importance and of critical importance to the wider Moss Valley landscape, which includes areas of high countryside heritage character, such as ancient field boundaries, trackways, hedgerows and clean water streams and ponds. The Moss Valley includes many areas designated SSSI status, which are protected by the Wildlife and Countryside Act 1981 (section 28). The Moss Valley is further characterised by unusually rich lowland-farmland mosaic of ancient woodlands, small-scale arable and dairy-farming meadow and pasture grassland, dotted with large timber trees, of which there are few comparators in the whole of England.
- 7.3. The area is home to many mammals, Red Data Book birds, reptiles, amphibians and insect species which are in rapid decline. The nationally important wealth of wildlife depends on the ecological strength of the Moss Valley, which in turn depends on maintaining the ecological integrity of the Valley as a whole. It was accepted during the Sheffield Green Belt Inquiry in 1982 that the Moss Valley is a nationally important reservoir for many

⁷⁵ Sheffield City Council. 'Infrastructure Delivery Plan Part 2: Infrastructure Schedule Addendum' (Sheffield City Council, May 2025) <https://017f5bf8-ff4d-415b-be58-79dae2836c33.usrfiles.com/ugd/017f5b_a48ec4aca84e4953a1ecd7f75619d79d.pdf> accessed 15 August 2025

precious and threatened species. The impact of climate change has seen the Moss Valley become an increasingly important stepping-stone and longer-term haven for an increased number of southern species, which are wholly dependent on the plant and insect food sources provided by the valley.

- 7.4. We exhibit to this statement, marked “**Exhibit 2**”, from Emeritus Professor Ian Rotherham, a leading environmental expert and former Ecologist and Head of Ecological Advisory services for Sheffield City Council. The views of Professor Rotherham are unequivocal, and we submit that they should be preferred over the Council’s superficial Heritage Impact Assessment (HIA) concerning the site.
- 7.5. The Plan and associated documentation, namely the HIA, fail emphatically to account for many of the factors identified by Professor Rotherham. Save for the vague proposal of an 8m buffer around Robin Brook, the Council has failed to identify any mitigation or compensatory measures. However, we submit emphatically that **any measures adopted would be insufficient**. The Moss Valley’s ecological richness has been created by centuries of gradual habitat-building and is of the highest green belt value, which **cannot be replaced or relocated**.
- 7.6. We submit that the proposed development is entirely inconsistent with the Framework duty to ‘*protect and enhance biodiversity and geodiversity*’ and will constitute a failure to ‘*safeguard components of local wildlife-rich habitats and wider ecological networks*’ including wildlife corridors and the stepping stones that connect them (para 192(a)). The ‘*wholly exceptional circumstances*’ required by paragraph 193 of the Framework to justify development do not exist and the presumption in favour of sustainable development (para 195) is rebutted by the evidence presented in this statement.
- 7.7. As stated above, any notion that BNG can be achieved at the site is, at best, fanciful.

Robin Brook and The Moss

- 7.8. The Moss is a Brook which flows through the Moss Valley and ultimately supplies the River Rother, which in turn supports the three lakes within the Rother Valley Country Park. The Robin Brook runs through the centre of the proposed SS19 site and is one of the main tributaries (alongside Shire Brook) to the Moss. These waterways play a critical role in supporting the ecosystem of the Moss Valley.

- 7.9. Research conducted by the Environment Agency conducted in 2019 and 2022 showed the alarmingly poor health of The Moss, with its ecological status categorised as ‘*bad*’ and chemical status categorised as ‘*fail*’.⁷⁶ The Group is concerned that the extensive development planned for the site will further diminish the health of the Robin Brook and its connected waterways. We remind the Council of its duties under para 187 of the Framework to enhance the natural and local environment and to avoid adverse effects or unacceptable risk to the Robin Brook, which is unlikely to be ensured by an overly simplistic buffer zone.

8. NORTH-EAST DERBYSHIRE DISTRICT COUNCIL, LOCAL PLAN

- 8.1. The S12 community is uniquely prejudiced by the Plan, due to its proximity to North East Derbyshire. The North East Derbyshire District Council (hereafter “**NEDDC**”) Local Plan⁷⁷ includes the following proposed site allocations:
- Land to the south of Bochum Parkway, Sheffield (45049) – approx. **3 miles** FROM SS19
 - Land North East of High Lane, Ridgeway, Eckington, Sheffield (45243) – approx. **0.8 miles** from SS19
 - Land to the rear of Ridgeway Courtyard, Ridgeway (45388) – approx. **1.1 miles** from SS19
 - Land north of the Old Vicarage, Main Road, Ridgeway, Derbyshire (45097) – approx. **1.4 miles** from SS19
- 8.2. All the above sites are designated as green belt. The NEDDC plan also includes plans for development in nearby areas of Eckington/Mosborough.
- 8.3. In addition, the Sheffield City Council Plan includes a proposed development on the former Norton Aerodrome site (ref: SS17) – approx. **2.4 miles** from SS19.
- 8.4. The above sites are all located within exceptionally close to one another. The combination of both Local Plans disproportionately affects the S12 community, especially but not limited to, residents of Gleadless Townend,

⁷⁶ Environment Agency, *The Moss from Source to River Rother Water Body* (Environment Agency, 2022) <<https://environment.data.gov.uk/catchment-planning/WaterBody/GB104027057720>> accessed 18 August 2025

⁷⁷ North East Derbyshire District Council, (Sites Dashboard, 2025) <<https://placemaker.ne-derbyshire.urbanintelligence.co.uk/documents/12>> accessed 12 August 2025.

Charnock & Birley. The issues outlined in this statement will be significantly exacerbated by the proposed development of the sites in the NEDDC Local Plan and the Aerodrome site.

- 8.5. The harms posed to the S12 community and reduction to the South East Sheffield green belt are **wholly disproportionate** when compared with other areas of the city (most notably the more affluent South West), despite the fact that the East of the city has markedly less green belt.

9. PLANNING APPLICATION, RAINBOW FORGE

- 9.1. We would like to draw the Inspectors' attention to a recent planning permission denial by the Council which we say bears striking similarities to the SS19 site. On 6 August 2025, the Council denied planning permission for development of a site adjacent to Rainbow Forge Primary School, Beighton Road, S12 (ref: 24/00242/OUT). The decision notice includes the following statement:

'The Local Planning Authority considers that insufficient information has been supplied in relation to the layout of the proposed development and in the Transport Assessment to evidence the estimated traffic generation, modal split, junction capacity...'

- 9.2. And:

*'As such, the development is deemed contrary to saved policy BE9 of the Sheffield Unitary Development Plan (1998) and policies CS53 and CS66 of the Sheffield Core Strategy (2009) and is therefore refused in accordance with paragraph 116 of National Planning Policy Framework (2024).'*⁷⁸

- 9.3. We consider that the same principles apply in relation to the SS19 site and that the same decision, to refuse permission to develop the site, should be made on the grounds that the proposals are non-compliant with paragraphs 115 and 116 of the Framework (as well as others), for the reasons outlined in the preceding sections
- 9.4. It must be noted that the planned development for Rainbow Forge consisted of 33 homes, whereas the plans for the SS19 envisage a site approx. **90% bigger**, with 300+ homes. We submit that the problems anticipated in respect of the Rainbow Forge site would be significantly greater, given the scale of the proposed development (one might estimate, up to 90% greater).

⁷⁸ Sheffield City Council, Decision Notice, 6 August 2025, para 2

10. CONCLUSION

- 10.1. There is a recurrent theme which permeates the Plan, at least insofar as it relates to the SS19 site, that is **failure**. The Council has failed to:
- a. Conduct a proper consultation
 - b. Prove that the Plan is sound.
 - c. Justify the release of the site from the green belt.
 - d. Undertake an adequate site-specific assessment, which acknowledges and addresses the discrete and exceptional issues concerning the site.
 - e. Comply with multiple duties imposed by the Framework and/or other legislative, regulatory and policy instruments.
- 10.2. In contrast, we have demonstrated compelling reasons why development of the site is entirely unfeasible. We have shown that the Plan insofar as it relates to the SS19 site, is **not sound** and there is **no credible argument for the release of the site from the green belt**. We have shown that the **disproportionate erosion of the South-East Sheffield Green Belt** and the specific harms to the S12 community **cannot be adequately mitigated or compensated** by measures outlined in the Plan, associated documentation, or at all.
- 10.3. We respectfully invite the Inspectors to reach the same conclusions and take the necessary action to ensure that the proposed development of the site is abandoned immediately. We propose that the land retain its current use for agriculture, or alternatively, that it is enhanced as a green space for community benefit.
- 10.4. If we can be of further assistance to the Inspectors, please contact us via email on [REDACTED]. We politely request that the Group be kept apprised of developments in connection with the Plan.

26th August 2025
S12 Green Belt Action Group

Fwd: Fw: White Lane meeting

From S12 Green Belt [REDACTED]

Date Mon 25/08/2025 19:57

To [REDACTED]

----- Forwarded message -----

From: [REDACTED]

Date: Wed, 20 Aug 2025 at 17:59

Subject: Fw: White Lane meeting

To: S12 Green Belt <[REDACTED]>

Hi All,

Please see the chain of emails regarding the non-attendance of any representatives from SCC Planning Team.

Regards - [REDACTED]

Sent from [Outlook for Android](#)

From: Karen McGowan (LAB CLLR) <[REDACTED]>

Sent: Tuesday, August 19, 2025 7:34:32 pm

To: [REDACTED]

Subject: FW: White Lane meeting

Hi [REDACTED]

This is the email trail below please note I have taken out SCC officers names and email addresses (I never give those out unless it's a generic email address) but my email was to Head of Planning.

Hope this helps let me know if you need anything further.

Best wishes

Karen

Sent: 26 June 2025 10:11

To: Karen McGowan (LAB CLLR) <[REDACTED]>

Cc: Matthew Dwyer (LAB CLLR) <[REDACTED]>; Clive Betts

<[REDACTED]>;

Subject: RE: White Lane meeting

Thank you for the below Karen,

You will be aware that officers have facilitated two formal four-hour events in Woodhouse and Handsworth respectively over the past two weeks and I am pleased to confirm that these were also well attended with healthy debate around the proposals being consulted on. Further events are planned during the remainder of the consultation period, including a daylong event in the city centre today.

Whilst we have sought to answer questions from the public over the consultation period as best we can, I am sure you will appreciate the challenges this presents from a resourcing point of view as we continue to facilitate the broader consultation process. Given this, rather than sending a list of questions from your event and seeking bespoke answers, I would ask you to encourage residents to send any comments they have at this point as formal representations that we will then pass to the Inspector. I cannot commit to providing answers to the questions asked at your public meeting and remind you that this is not part of the process that has been agreed by the City Council.

Regards

From: Karen McGowan (LAB CLLR) <[REDACTED]>
Sent: 24 June 2025 10:30
Cc: Matthew Dwyer (LAB CLLR) <[REDACTED]>; Clive Betts
<[REDACTED]>;

Subject: RE: White Lane meeting

Hi

Thank you for the reply and is what I expected to be honest. I do think there should have been a session organised for every area that has housing in the green belt proposed – residents have a right to be properly consulted on something happening on their door step. It has been left to us to write a letter out to all the residents as many are elderly and don't use facebook or online services. I think it is really poor of the council not to have done a letter themselves on this and advertising the sessions available. We will organise our own drop in session and feedback any question which I hope your team will respond to.

Many thanks

Councillor Karen McGowan
Birley Ward

Sent: 24 June 2025 08:36
To: Karen McGowan (LAB CLLR) <[REDACTED]>
Cc: Matthew Dwyer (LAB CLLR) <[REDACTED]>; Clive Betts
<[REDACTED]>;

Subject: White Lane meeting

Hi Karen,

Thank you for the below and apologies it has taken a few days to drop a line back.

Whilst we do understand it can be challenging for some residents to travel to events; we must balance this with the resources available to us in the context of the number of events

we are able to support. In this respect, we are not intending to add any further events to the schedule we have in place.

We do have an event in the Winter Gardens on Thursday of this week between 10am and 3pm in the residents would like to attend that.

Regards

From: Karen McGowan (LAB CLLR) <[REDACTED]>
Sent: 19 June 2025 14:53
To:
Cc: Matthew Dwyer (LAB CLLR) <[REDACTED]>; BETTS, Clive
<[REDACTED]>;
Subject: FW: White Lane meeting

Hi both

We are receiving messages on social media from residents requesting a meeting to discuss the White Lane site in the Local Plan. Is it possible to either do a drop in session or a presentation specifically for White Lane. See the message below where a resident is saying the LAC meeting wasn't accessible for most residents in S12.

Birley Ward Labour Councillors is it possible to get another South East LAC meeting or at least another drop-in, in S12 as an area it is impacting?! It is not inclusive or accessible to hold the majority in S13! Getting to Woodhouse or Handsworth from S12 3 without a taxi or access to a car, is very difficult unless you want to walk 30+ mins then catch a bus or change multiple buses/trams, which is certainly not easy for the elderly or disabled. It feels you have very much failed to consider the needs of some of your constituents. At the bare minimum could you please add a drop-in which is listed on the official event listings within S12 to give residents fair opportunity to discuss with the relevant people.

Many thanks

Councillor Karen McGowan
Birley Ward

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S12 Green Belt Action Group
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Comments on the Sheffield City Council Proposals Concerning Green Belt at White Lane, Charnock

Ian Rotherham – experience and cv.

Professor Emeritus, Sheffield Hallam University, BSc PhD PGCE FRSB CEnv MCIEEM

Former Sheffield City Council Ecologist and Head of Ecological Advisory Services.

Former Professor of Environmental Geography, Reader in Tourism and Environmental Change, Sheffield Hallam University

45 years' experience in university research and local government planning advisory service and environmental consultancy.

Author of over 500 academic papers, and 50+ books.

Context

I have known the area in some detail since the 1970s and was instrumental in the Green Belt Public Inquiry in the 1980s and which clearly established the Moss Valley as a regionally significant landscape on high and irreplaceable ecological importance and county-level landscape value as a countryside area. The results of the inquiry included the establishment of the Moss Valley (later 3-Valleys) Countryside Management Project.

The site in question is an important part of this wider landscape and includes areas of high countryside heritage character including ancient field boundaries, trackways, and associated hedgerows. This aspect of the landscape character, archaeology, and heritage is not addressed in the City Council's evaluation of archaeology by SYAAS.

Comments on the ecological significance of the area

The area is of high landscape and aesthetic value and impacts on county protected landscape areas throughout the Moss Valley.

Robin Brook and the associated ancient hedgerows have high intrinsic value but also enhanced importance as green corridors at a landscape level. They link down into the valley with unimproved meadows and old hedgerows around Carter Hall.

Along with breeding farmland birds, many species of which are already in serious decline, the area is actively used as habitat by a number of uncommon species. Overall, the loss of this area would be hugely damaging and is such [with ancient hedgerows and other non-tradeable features] that it cannot be offset or compensated for.

Protected species include breeding barn owl nearby and hunting over the site, badger, numerous bat species, and much more. The area has bird species that are now declining like skylark, yellowhammer, linnet, tree sparrow, house sparrow, etc. and others. Lapwing has also been recorded. The countryside here is habitat for tawny owls, kestrel, sparrowhawk, common buzzard, grey heron, and for typical farmland birds like chaffinch, greenfinch, bullfinch, willow warbler, whitethroat and blackcap. I have also recorded the now increasingly rare cuckoo in this area. In terms of mammals, along with badgers there are fox, brown hare, rabbit, hedgehog, wood mouse, field vole, brown rat, muntjac deer, and roe deer. Grass snake, smooth newt, common frog, common toad, and the rare, palmate newt are all recorded from the vicinity. The area is rich in invertebrates such as butterflies, moths, hoverflies, bees and bumblebees, and many of which are groups under serious pressure of long-term declines.

Specific queries and issues:

Assessment is required prior to any designation and not retro fitted.

- 1) *'Planning applications must include a comprehensive assessment of the development's impacts on the environment. Where appropriate, adverse impacts should be offset through compensatory improvements to the environmental quality and accessibility of remaining areas of Green Belt.'* It is totally unclear how this might be achieved to provide any local or nearby viable compensation. Amongst other problems, the City Council does not own or control any land in the adjacent Green Belt zone, which is working farmland. Achievability needs to be clarified and transparent. Furthermore, ancient species-rich hedgerows are non-tradeable, and their loss cannot be mitigated.
- 2) *This site is identified as impacting on Heritage Assets and due consideration should be given to the impact of any proposal prior to the submission of any planning application. Development proposals should implement the recommendations set out in the Heritage Impact Assessment prepared in support of the Local Plan, or other suitable mitigation measures agreed with the Local Planning Authority, to avoid or minimise harm to the significance of heritage assets and their settings.* As noted above, this has not been addressed in the SYAAS report which simply highlights the built structures such as Carter Hall. The important landscape context is not taken into account.

I write also as the former director of ecological services for SCC and am VERY CONCERNED about this and other proposals which impact on the long-term sustainability of the valley. Such proposals affect other matters such as exacerbating floodwater runoff in this very flood-prone catchment, with regular flooding risk downstream at Ford and lower down the catchment. Furthermore, the present area with

its provision of access and footpaths and proximity to a local primary school, offers major health and wellbeing benefits associated with nature connectedness. These assets would be severely compromised by the proposals.

Professor Ian D. Rotherham, August 2025