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Introduction

The following representations focus on the Main Modifications (MMs) to the Sheffield Plan, in particular those relating to biodiversity, blue and green infrastructure, and site allocations. While the MMs introduce additional wording intended to strengthen the protection of biodiversity, including references to buffers, ecological corridors, Biodiversity Net Gain and the Local Nature Recovery Network, they do not materially change how the Plan operates in practice.

In particular, while certain policies, as modified, state that biodiversity and irreplaceable habitats should be afforded the greatest weight, this is not reflected in the site selection process or spatial strategy. The MMs do not demonstrate how this level of protection has been applied in practice, nor do they ensure that sites have been selected or refined to avoid impacts on ecologically sensitive areas.

The MMs continue to rely on non-binding wording such as 'explore opportunities' and 'where feasible', and defer key matters to the planning application stage. As a result, there is no clear mechanism to ensure that the stated level of protection is translated into decision-making, particularly in relation to the allocation of sites and the release of Green Belt land.

While the policies, as modified, appear to strengthen the protection of biodiversity, this is not carried through into how sites are selected, assessed or delivered.

As a result, the MMs do not provide sufficient certainty that impacts on designated sites, priority habitats and wider ecological networks will be avoided. The Plan therefore continues to rely on mitigation and compensation rather than a true avoidance-first approach.

This inconsistency has direct implications for soundness. The MMs do not demonstrate that reasonable alternatives have been fully explored, nor do they ensure that biodiversity is properly embedded within the spatial strategy. As such, the Plan, as modified, remains **unjustified, ineffective and inconsistent with national policy**.

Policy Modifications

MM8 - Employment Land (Large-Scale Logistics Need)

This MM recognises that the need for large-scale logistics land should be revisited through an early review of the Sheffield Plan, including consideration of supply and requirements at a wider sub-regional level. This acknowledges a degree of uncertainty in the evidence base relating to the scale and distribution of logistics needed.

However, despite this, the Plan continues to allocate significant areas of Green Belt land for employment uses, including large-scale logistics, without any requirement to phase or prioritise their release pending the outcome of that review. There is no mechanism within the MMs to ensure that such sites are only brought forward where a clear and evidenced need has been demonstrated.

As a result, Green Belt release may occur in advance of the evidence base being fully established, with sites capable of coming forward immediately regardless of whether they are ultimately required. This undermines the justification for their allocation and creates a clear risk that unnecessary harm will be caused to land with ecological function.

In the absence of a clear sequential or phased approach, the MM does not resolve the inconsistency between the acknowledged need for further evidence and the immediate release of Green Belt land. The policy framework therefore remains **unjustified and ineffective**.

MM10 - Policy SP1: Overall Growth Plan

The MM to Policy SP1 introduces updated wording relating to growth, including references to blue and green infrastructure. However, biodiversity remains embedded within green infrastructure and is not treated as a standalone primary constraint. The MMs do not introduce any changes to address this issue, and as a result the policy framework continues to risk enabling growth in locations that are fundamentally incompatible with ecological protection, contrary to national policy and the requirement for the Plan to be justified and effective.

It also introduces additional wording requiring the protection, management, enhancement and extension of blue and green infrastructure. However, while the inclusion of ‘extension’ broadens the ambition of the policy, it is not supported by any clear mechanism or framework for delivery.

In particular, the MM does not set out how such extension is to be achieved, nor does it establish criteria, spatial priorities or minimum requirements. Although a more detailed Blue and Green Infrastructure policy is expected, this has not yet been developed. As a result, there is currently no clear policy direction to guide planning decisions in relation to the protection, management, enhancement or extension of these assets.

This creates a policy gap, where in practice, this is likely to result in inconsistent application and continued reliance on case-by-case judgement at the planning application stage. The MM therefore fails to provide sufficient certainty that blue and green infrastructure will be protected or extended in a way that supports nature recovery.

As a result, the MMs fail to resolve the ineffectiveness of the policy or address the failure to treat biodiversity as a primary constraint within the growth strategy. The policy therefore remains

ineffective and inconsistent with national policy and the requirement for a clear and deliverable spatial strategy.

MM11 - Policy SP2: Spatial Strategy

The MM to Policy SP2 amends the spatial strategy, including a change in wording which states that future growth will 'primarily' be focused on previously developed land. This represents a weakening of the policy direction, reducing the expectation that development should be directed to brownfield land and allowing greater flexibility for development elsewhere, including on Green Belt land.

The MM does not introduce a clear sequential approach to site selection. There remains no requirement to demonstrate that all reasonable brownfield opportunities have been fully assessed before the release of Green Belt land, or that sites have been considered in light of their ecological value and role within the Nature Recovery Network.

This risks directing development to ecologically sensitive areas without proper justification and undermines the basis on which Green Belt release is justified. As a result, the MM does not resolve the spatial strategy in a way that ensures the Plan is justified, effective or consistent with national policy.

MM103 - Policy BG1: Blue and Green Infrastructure

The Plan does not treat biodiversity as a primary constraint. The MMs to Policy BG1 do not resolve this issue.

The inclusion of the Nature Recovery Network (NRN) within the MMs is welcomed, as it reflects national policy and the objectives of the Environment Act 2021. However, the MMs do not set out how the NRN will influence decision-making or site design.

The policy refers to the protection of 'designated sites', however it is unclear whether this term is intended to apply solely to statutory designations (such as SSSIs), or whether it also includes non-statutory designated sites such as Local Wildlife Sites. If the term is intended to apply only to statutory designations, this would represent a significant omission, as Local Wildlife Sites form a key component of the Nature Recovery Network. If it is intended to include both statutory and non-statutory sites, this should be made explicit to ensure that appropriate weight is consistently applied in decision-making.

In either case, the MMs do not provide a mechanism to recognise or protect the wider components of the Nature Recovery Network, including priority habitats and ecological corridors which may not have any formal designation but are essential to ecological function and connectivity.

Again, it is recognised that a more detailed Blue and Green Infrastructure Strategy is intended to be prepared. However, until this is in place, there is a clear policy gap. The MMs do not provide sufficient interim direction to guide decision-making in relation to the protection, management, enhancement and extension of blue and green infrastructure. In the absence of clear requirements within the Plan itself, there is a risk that decisions will be made inconsistently or that ecological outcomes will be deferred to the planning application stage.

The MMs do not introduce any minimum standards for ecological provision, nor do they distinguish between land required for biodiversity and that for recreation. While the MMs refer to ecological connectivity, including stepping stones and opportunities for enhancement, they do not set out clear or enforceable requirements to ensure that green infrastructure delivers ecologically functional habitat at a sufficient scale or in appropriate locations. As a result, the policy risks delivering accessible green space of limited ecological value, rather than contributing to meaningful nature recovery. In addition, there is no clear evidence that these requirements have been applied in the selection or refinement of site allocations.

A number of allocated sites, as modified, appear to conflict with these principles, including where development would fragment existing habitats, constrain ecological buffers, or place pressure on identified corridors. This suggests that the provisions within BG1 have not been translated into the spatial strategy or site selection process.

As a result, the MMs do not demonstrate how the policy requirements relating to connectivity and habitat protection have influenced outcomes in practice. This undermines confidence that the policy will be effective in delivering a coherent Nature Recovery Network and reinforces the concern that biodiversity is not being treated as a primary constraint within the Plan

Also, the continued emphasis on multifunctional green infrastructure creates the potential for conflict between access and habitat protection. While the policy includes wording which states that, where conflicts arise, priority will be given to the protection and enhancement of biodiversity, the MMs do not introduce any clear mechanism to ensure that this is applied in practice. In the absence of clear, enforceable requirements, there is no assurance that biodiversity will, in practice, be prioritised where such conflicts arise. The MMs also allow for infrastructure such as pedestrian and cycle routes to be delivered through sensitive areas, without clear safeguards to avoid harm.

The policy therefore remains **ineffective and inconsistent with national policy**.

MM120 - Policy ES5: Managing Air Quality

The MM amends Policy ES5, including paragraph 3.15, to recognise that aerial emissions and poor air quality can have a negative impact on the natural environment and biodiversity. This is a positive addition. However, the MM does not translate this acknowledgement into a robust spatial or cumulative assessment within the Plan.

Alongside Policy NC1, the MM refers to the need to consider cumulative impacts, it does not demonstrate how this has been applied in practice in relation to biodiversity. In particular, there is no evidence within the Plan that the combined effects of housing and employment allocations on ecological receptors have been assessed. Multiple sites draw on the same road networks and are located within shared ecological corridors, yet impacts such as nitrogen deposition, particulate pollution, lighting and disturbance have not been assessed in combination for sensitive habitats.

This is a significant omission, as receptors such as Local Wildlife Sites, priority habitats and irreplaceable habitats are particularly sensitive to incremental changes in air quality. Without a joined-up assessment, the Plan cannot demonstrate that cumulative emissions will not lead to the deterioration of these habitats or undermine the function of the wider Nature Recovery Network.

Therefore the MM acknowledges the issue of cumulative air quality impacts but does not provide the necessary framework to address it. As a result, the policy remains **ineffective** and the Plan cannot demonstrate that it is consistent with national policy in this regard.

MM178 - Policy GS1: Development Affecting Urban Green Space

The MM strengthens Policy GS1 through the use of cumulative criteria (a–g), which must all be satisfied. This represents a positive amendment and increases protection for Urban Green Space, including through the requirement not to cause or increase a break in the city's blue and green infrastructure network.

However, the effectiveness of these safeguards is dependent on how blue and green infrastructure is defined, applied and weighted within the Plan. As set out above in relation to Policy BG1, the MMs do not provide sufficient clarity or enforceable requirements to ensure that biodiversity is treated as a primary constraint or that ecological function is secured at a meaningful scale.

As a result, while GS1 includes a requirement to avoid breaks in the green infrastructure network, it is not clear how this will be interpreted in practice, particularly in relation to sites of ecological value that are not formally designated or where multifunctional green space is proposed. The lack of clear standards within BG1 means that the threshold for what constitutes a 'break' or unacceptable harm to ecological connectivity is not well defined.

In addition, the 'surplus to requirements' test in criterion (a)(i) remains based on quantity and accessibility standards set out in Table 4, which are focused on recreational provision. While criteria (b–g) provide important safeguards, they do not explicitly require biodiversity value to be considered within this test. This places greater reliance on the green infrastructure provisions to protect ecological function.

Taken together, the MMs do not fully resolve how ecological value will be protected in practice, particularly in the context of consequential Green Belt deletions. Land released from the Green Belt and redesignated as Urban Green Space will be subject to the GS1 framework, including the "surplus to requirements" test and the wider green infrastructure criteria.

As a result, ecologically valuable land released through consequential Green Belt deletions may become vulnerable to incremental loss or degradation. The policy framework therefore does not provide sufficient certainty that biodiversity will be protected in practice, and remains ineffective in ensuring that it is treated as a primary constraint.

MM185 - Policy GS5: Development and Biodiversity

The MM confirms that irreplaceable habitats and protected species have been elevated to international designations and should be afforded the greatest weight. While this reflects national policy in principle, the MM does not introduce a corresponding framework to ensure that this level of protection is delivered in practice.

In particular, the policy continues to rely on minimum buffer distances, which are described as starting points and are primarily concerned with preventing direct physical damage, such as root protection. The MM does not define functional, evidence-based buffers that account for air pollution, noise, lighting, recreational pressure and urban edge effects.

This creates a clear inconsistency within the policy. Whilst 'greatest weight' implies a high level of protection, the only spatial controls provided are minimum buffers that do not address the full range of impacts known to affect sensitive habitats. As a result, the policy does not demonstrate how the stated level of protection will be achieved.

This is particularly significant in light of MM120, which recognises that aerial emissions can have a direct negative impact on biodiversity. Despite this, MM185 does not introduce any requirements to measure or mitigate such impacts. Substantial evidence, including Natural England guidance, indicates that the effects of traffic-related air pollution extend well beyond the minimum buffers identified in the Plan. The absence of defined buffer ranges means that protection of Local Wildlife Sites, priority habitats and irreplaceable habitats remains uncertain and dependent on site-by-site judgement.

This issue could be addressed through the inclusion of minimum land use buffers linked to the type and intensity of adjacent development. For example, HGV-intensive employment uses are known to generate significantly higher levels of traffic-related emissions and disturbance, and would reasonably require larger buffers, potentially in the range of 50–100 metres, to avoid harm to sensitive habitats. Similarly, residential development introduces different but still predictable pressures, including increased recreational use, trampling and disturbance, which are already recognised within the MMs to GS5 (e.g. criterion (h) relating to the reduction of human pressures) making a 50m buffer more applicable.

The absence of a framework that differentiates buffer requirements by land use and impact means that these well-understood effects are not accounted for at the plan-making stage. As a result, the policy does not provide sufficient certainty that appropriate mitigation will be secured, and instead relies on reactive, site-by-site negotiation and potential down playing at the planning application stage.

The MM also introduces changes to the weighting applied to priority habitats and species. The apparent reduction from 'very significant weight' to 'significant weight' is not clearly justified and risks weakening protection for habitats that are identified at a national level and are central to the delivery of the Environment Act 2021 and Local Nature Recovery Strategies. By grouping Priority Habitats and Priority Species within 'local designation', the MMs risk understating their importance and reducing the weight that should be applied in decision-making. This is inconsistent with their role in delivering national policy objectives and statutory biodiversity duties.

Furthermore, the policy does not distinguish between priority habitats based on condition or strategic importance. Habitats in good or great condition form the core of the ecological network and are critical to achieving nature recovery targets, yet the MM does not provide enhanced protection for these areas. It would be more appropriate for priority habitats in good or great condition to be treated in line with irreplaceable habitats.

In addition, the policy places emphasis on a limited set of biodiversity enhancement measures without requiring that these are appropriate to site context or capable of delivering functional ecological benefits. This risks a checklist-style approach, for example, we have recently seen hedgehog fence holes being requested within HGV heavy warehouse development which could endanger the species they are intended to support, potentially increasing the risk of mortality and creating ecological traps rather than viable habitat networks. This illustrates the risk of applying generic enhancement measures without regard to site context, surrounding land use or species behaviour. Without a requirement to demonstrate that proposed enhancements are ecologically appropriate and capable of delivering functional benefits, the policy risks securing

features that are present in form but ineffective, or even harmful, in practice. The use of 'may' introduces discretion where certainty is required. In the absence of clear triggers or requirements, there is no assurance that necessary biodiversity enhancements will be secured in practice.

Crucially, the MM does not clearly reinforce the mitigation hierarchy. Minor enhancement measures cannot compensate for the loss, deterioration or fragmentation of irreplaceable habitats or established ecological networks. By failing to distinguish between enhancement and mitigation, the policy risks allowing significant ecological harm to be justified through the provision of inappropriate or ineffective features.

As a result, while MM185 reflects the correct policy intention in principle, it does not provide a robust or evidence-based framework to secure that outcome in practice. The reliance on minimum buffers, combined with the absence of functional spatial requirements, means that the policy remains ineffective and does not ensure that biodiversity is treated as a primary constraint within the Plan.

Site Allocation comments

Many of the following MMs involve development in close proximity to, or result in the loss or isolation of irreplaceable or potentially irreplaceable habitats, yet the Plan as modified does not demonstrate that the 'wholly exceptional reasons' test required by national policy has been applied on a site-specific basis. The justification for Green Belt release relies on exceptional circumstances, which is a separate and materially lower threshold. The Plan does not clearly distinguish between these tests, creating a risk that the justification for Green Belt release is being relied upon to support impacts on irreplaceable habitats.

The 'wholly exceptional reasons' test requires clear evidence that harm is unavoidable and that no less damaging alternatives exist. In this context, the Plan's approach to site selection is directly relevant. The allocation of sites represents a selection from a wider pool of potential options, including identified but untested brownfield and other opportunity sites. In the absence of a robust and comprehensive assessment of these alternatives, it cannot be demonstrated that development affecting irreplaceable habitats is necessary or that such harm is unavoidable.

At the same time, the Plan fails to establish a reliable ecological baseline. While both ecological survey evidence and historic landscape analyses exist, which indicate that ancient boundaries across some of the Green Belt release sites are widespread, they have not been integrated. The Plan elevates species-rich hedgerows but does not assess whether other long-established hedgerows may also be ancient and therefore irreplaceable. This requires an integrated assessment combining ecological survey data with historic landscape evidence, including enclosure mapping and field pattern analysis, to determine whether hedgerows meet the threshold for irreplaceable habitat.

As a result, the extent of irreplaceable habitat is likely to be understated and the correct policy test has not been properly applied.

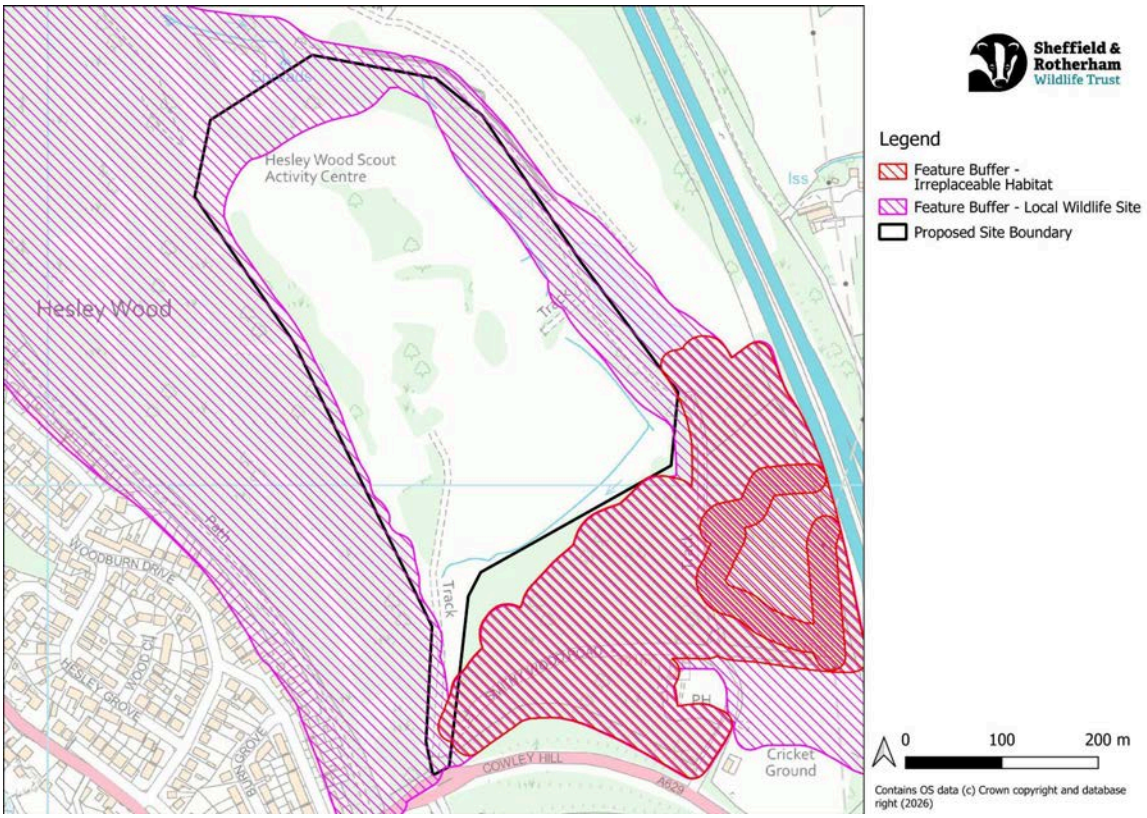
The following are comments relating to our objection sites.

MM460 - CH04: Hesley Wood, north of Cowley Hill

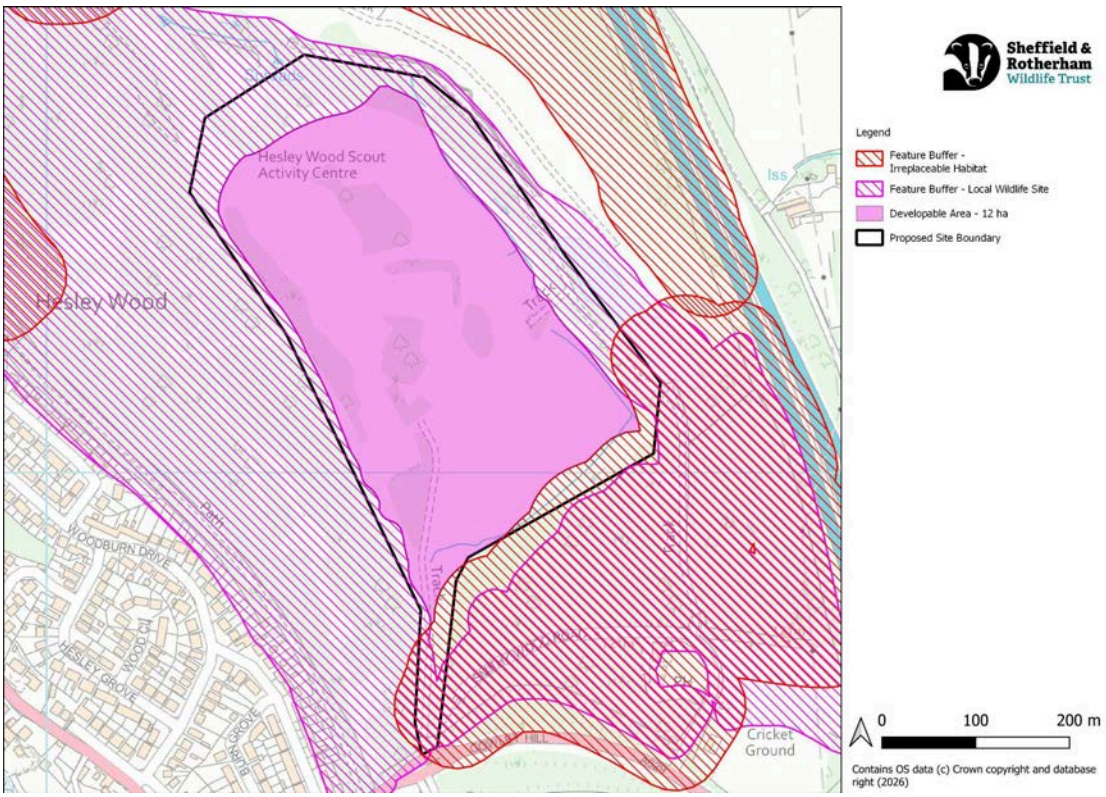
The MMs acknowledge that development of this site can only be achieved where works are undertaken within the Hesley Wood Local Wildlife Site. This is not presented as a possibility but as a requirement to enable access and site preparation. While the plan as modified allows for such harm to be minimised and compensated, this is directly inconsistent with the Inspectors' post-hearing letter, which requires that there should be no development within Local Wildlife Sites.

As a result, the allocation is dependent on a form of development that appears to be already in conflict with the Inspectors' clear direction.

In addition, the plan below, which highlights only the 15m Root Protection Zone of the Ancient Woodland (shown in red), demonstrates that any viable access arrangement would extend into what is effectively that minimum root protection zone. Such an impact goes beyond indirect effects and would constitute direct harm to an irreplaceable habitat.



This constraint is further intensified by the nature of the proposed development. The allocation is for HGV-heavy employment use, where it is entirely predictable that air pollution, noise, lighting and disturbance will be significantly greater than for lower intensity uses. When these impacts are properly taken into account, the area required to avoid deterioration of the Ancient Woodland would likely extend well beyond the minimum buffer.



As a result, both the access and the developable area become substantially more constrained if indirect impacts are to be avoided in accordance with national policy. The MMs do not demonstrate that these constraints have been accounted for, nor that the site can be delivered without causing deterioration of the Ancient Woodland which would again require the application of the 'wholly exceptional reasons' test.

Taken together, this creates a fundamental constraint:

- access requires development within a Local Wildlife Site, contrary to the Inspectors' direction; and
- access and layout also require encroachment into the ecological buffer zone of Ancient Woodland, triggering the need for wholly exceptional reasons

The MMs therefore identify a site that can only be delivered through policy conflict, assume harm will occur and seek to mitigate it, without first establishing that it is acceptable in policy terms.

The Plan, as modified, assumes a net developable employment area of **13.35 hectares**, however this is contingent on the delivery of a viable access strategy. As set out above, the MMs do not demonstrate that access can be achieved without development within the Local Wildlife Site or encroachment into the minimum protection zone of Ancient Woodland.

In the absence of a policy-compliant access solution, the site cannot be considered deliverable. In these circumstances, the assumed employment capacity reduces from **13.35 hectares to zero**.

Even if a compliant access solution could be identified, the developable area would be reduced once realistic, land use-dependent buffers to the Ancient Woodland are applied to address indirect impacts such as air pollution, noise, lighting and disturbance. The MMs do not

demonstrate that this has been accounted for, and the effective employment area would therefore reduce further to **12 hectares**.

Furthermore, the MMs significantly underplay the known constraints associated with land contamination. Previous planning applications and site investigations confirm that there is a history of significant contamination across the site. Despite this, the MMs defer detailed assessment to the planning application stage and do not demonstrate that the site is capable of being safely developed.

This is a material omission. The extent of contamination has direct implications for:

- site viability
- the need for extensive remediation and ground disturbance
- and the risk of pollution affecting the adjacent Ancient Woodland and Local Wildlife Site

Without a thorough understanding of these constraints, it is not possible to conclude that the site can be developed without unacceptable risks to public health or the natural environment.

As a result, the evidence base is insufficient and the policy framework relies on mitigation rather than avoidance. **The MMs therefore do not demonstrate that the allocation is justified, effective or deliverable.**

MM350 - NES36: Land to the south of the M1 Motorway Junction 35

The MMs do not resolve the fundamental conflict between the allocation of NES36 and national policy relating to irreplaceable habitats. The NPPF is clear that development resulting in the loss, deterioration or isolation of Ancient Woodland should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists. The MMs do not demonstrate that this test has been applied to NES36.

In this case, the allocation would result in the effective isolation of Smithy Wood Ancient Woodland through development along its boundary and the severance of its connection to the wider Blackburn Brook corridor. This represents a fundamental change to the ecological function of the woodland, rather than a marginal or localised impact.

Smithy Wood forms part of the Blackburn Brook corridor, which is identified as an important ecological corridor within the emerging Local Nature Recovery Strategy and the Strategic Green Network. This corridor already experiences pressure, including from the recently approved HGV refuelling hub, which will weaken its ecological function once complete. The allocation occupies a critical remaining section of this corridor. Development would not simply introduce edge effects, but would remove or significantly degrade the remaining functional link between Smithy Wood and the wider landscape.

This represents a change in ecological impact, moving from a weakened but functioning corridor to an isolated fragment. The MMs do not provide evidence that this loss of connectivity has been assessed or that it can be avoided.

This outcome is also inconsistent with Policy SP1, as modified, which requires that the Nature Recovery Network is protected, enhanced and extended. Rather than enhancing or extending the network, the allocation would result in its fragmentation and contraction, undermining its function at a landscape scale.

While Policies GS5 and GS7, as modified, afford the greatest weight to irreplaceable habitats, the MMs do not demonstrate how this level of protection has been applied to the site. The requirements within the site policy are limited to minimum buffers associated with direct physical protection and do not address wider impact pathways, including air pollution, noise, lighting and hydrological change. This is inconsistent with the recognition elsewhere in the Plan (including MM120) that such impacts can lead to deterioration of habitats.

The MMs therefore do not demonstrate how the stated policy position of 'greatest weight' is translated into site-specific requirements, nor how deterioration or isolation of Ancient Woodland will be avoided.

The MMs require the provision of a wildlife corridor to maintain connectivity. The inclusion of this requirement indicates that the loss of functional connectivity is anticipated. Rather than demonstrating how isolation of the Ancient Woodland will be avoided, the MMs assume that it will occur and seek to mitigate its effects. This is contrary to national policy, which requires that such harm is avoided in the first instance unless wholly exceptional reasons are demonstrated. In the absence of wholly exceptional reasons, it is premature and inconsistent with the policy to be considering mitigation or compensation.

The MMs reduce ecological connectivity to the movement of species across a proposed access route, relying on engineered mitigation measures without demonstrating their feasibility or effectiveness. To function effectively in this context, a corridor would typically require substantial separation from disturbance, or the provision of measures such as guidance features and safe crossing structures to enable movement across a 24-hour HGV route. The MMs do not specify how such measures would be delivered, nor do they demonstrate that they are feasible or capable of long-term maintenance.

Even where such infrastructure is assumed, the MMs do not address the behavioural response of species to disturbance. Heavily trafficked routes, combined with lighting, noise, vibration and emissions, are well established barriers to movement. The MMs do not provide evidence that species sensitive to these factors would use the proposed corridor, nor do they address the long-term management required to maintain its effectiveness.

More fundamentally, the MMs do not reflect the correct understanding of ecological connectivity. National policy requires the establishment and maintenance of coherent ecological networks, which relate to the functioning of habitats at a landscape scale. The provision of a crossing point does not constitute a coherent ecological network and cannot compensate for the loss or fragmentation of connected habitat.

In this case, the introduction of a major access route adjacent to Ancient Woodland, combined with the loss and fragmentation of surrounding habitat, would create a barrier effect. The MMs do not demonstrate that this can be avoided or mitigated. As a result, the allocation would lead to the effective ecological isolation of Smithy Wood, representing a fundamental and irreversible change in ecological function.

In these circumstances, the MMs rely on mitigation that is unproven and defer a fundamental constraint to the planning application stage. The question of whether the site can be developed without isolating Ancient Woodland should have been resolved through the plan-making process. The failure to do so means that the **allocation is not justified**.

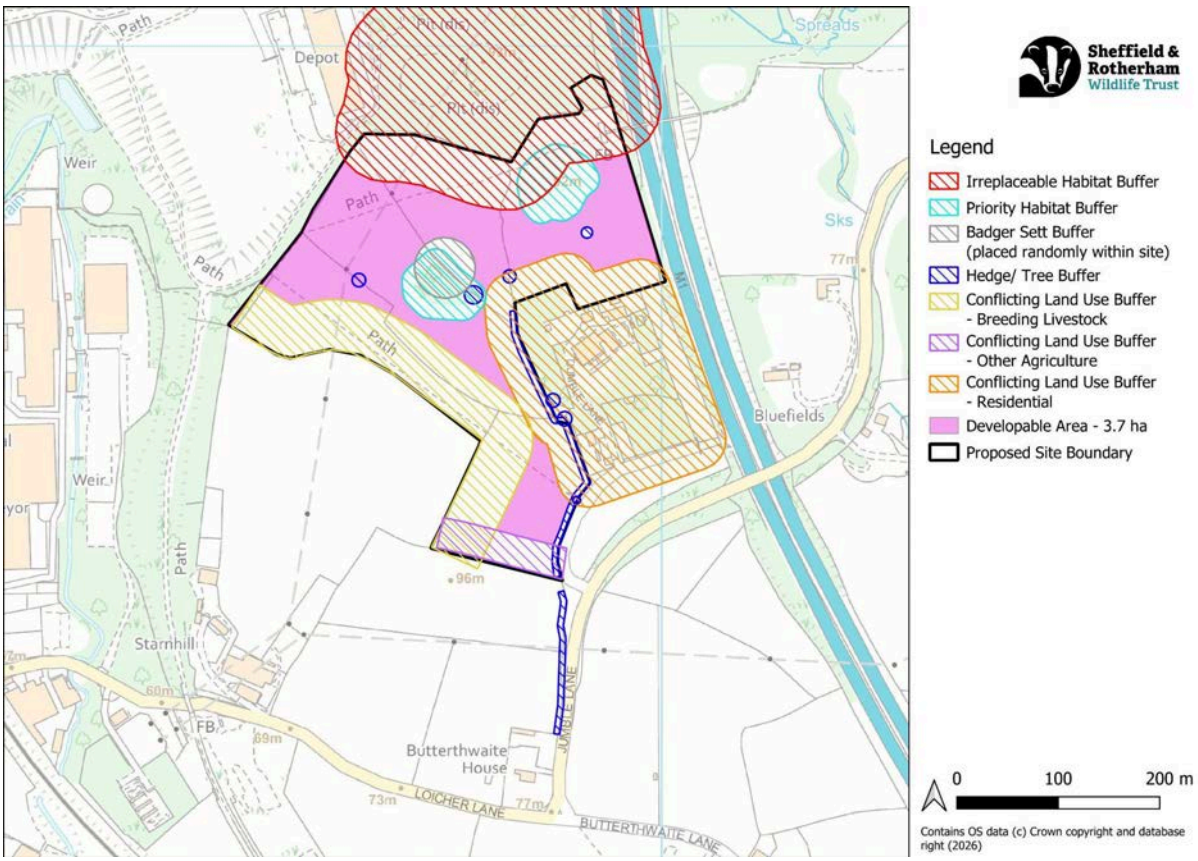
Setting the above aside, the MMs do not demonstrate that the ecological and land use constraints affecting NES36 have been fully taken into account in the assessment of the site.

The site includes or is directly adjacent to a number of high value features, including Smithy Wood Ancient Woodland, a confirmed area of priority habitat lowland acid grassland in good condition, species-rich hedgerows likely to be ancient, smaller woodland areas and at least one badger sett. Each of these features requires appropriate protection, and in combination they place substantial limitations on the developable area.

- Ancient Woodland protection is limited to root protection buffers, with wider impacts deferred to application stage; this does not reflect national policy which requires consideration of air pollution, noise, lighting and hydrological effects.
- For an HGV-intensive employment use, a land use-dependent buffer (c.50–100m) would typically be required to avoid deterioration of irreplaceable habitat; the MMs do not demonstrate this has been accounted for.
- Priority habitat (lowland acid grassland) and species-rich hedgerows (likely ancient) require retention and buffering; the MMs do not demonstrate that these constraints are reflected in the developable area.
- The site requires land use separation between employment and other sensitive land uses to address amenity impacts; this is not reflected in the allocation. MM459 - CH03 includes conditions for buffering requirements (albeit without clarity), whereas NES36 does not, despite comparable or greater constraints, indicating that site capacity has not been assessed on a consistent or policy-compliant basis.

The Plan assumes a net developable employment area of **10.72 hectares within a total site area of 11.15 hectares**, indicating that the majority of the site is considered available for development. However, this assumption does not reflect the cumulative effect of ecological buffers, land use separation distances and retained features.

This is illustrated in the constraints plan below, which applies realistic buffer assumptions derived from policy and standard practice. When these are applied, the remaining developable area is reduced to approximately **3.7 hectares,** with a part of that area being effectively precluded from development. This represents a substantial reduction from the assumed capacity and demonstrates that the majority of the site is constrained once policy-compliant requirements are applied.



The MMs also do not demonstrate that all irreplaceable habitats on the site have been fully identified.

Even if the Inspectors were to conclude that the test of wholly exceptional reasons has been met in relation to the potential isolation or deterioration of irreplaceable habitats, these constraints remain highly relevant to the assessment of deliverability and site capacity.

Therefore, the site cannot be considered deliverable at the scale proposed. The failure to account for these constraints at the plan-making stage undermines the justification for the allocation and raises serious concerns as to whether the site can accommodate development without unacceptable harm.

MM351 - NES37: Land between Creswick Avenue and Yew Lane

The MMs do not demonstrate that NES37 is deliverable in practice once ecological, heritage and policy constraints are properly applied. The allocation is supported only by a high-level concept plan, with no detailed masterplanning. This is a critical omission, as the viability of the site is dependent on whether access can be achieved without breaching key policy protections.

The MMs identify potential access routes from Creswick Lane, Yew Lane, Creswick Avenue and The Wheel. However, they do not demonstrate that any of these access points can be delivered in accordance with Policy GS5, Policy GS7 or the Inspectors' post-hearing direction.

In particular, the concept plan indicates that a primary access route may be taken from Yew Lane, passing through a Local Wildlife Site. While the policy suggests this could be minimal and compliant, this is directly inconsistent with the Inspectors' clear direction that there should be

no development within a Local Wildlife Site. The MMs do not explain how this conflict is resolved and therefore rely on an access assumption that is not policy compliant.

Alternative access options raise similar concerns. Access from Creswick Avenue would require the removal or fragmentation of a species-rich hedgerow (identified as H23 in the PEA). Such features are afforded the highest level of protection under Policies GS5 and GS7, and may constitute irreplaceable habitat. The MMs do not demonstrate that wholly exceptional reasons exist to justify their loss or deterioration. Similarly access from Creswick Lane may serve a limited portion of the site, but it cannot provide a comprehensive access solution without breaching Policy GS5 (damage to species rich hedgerow or mature woodland).

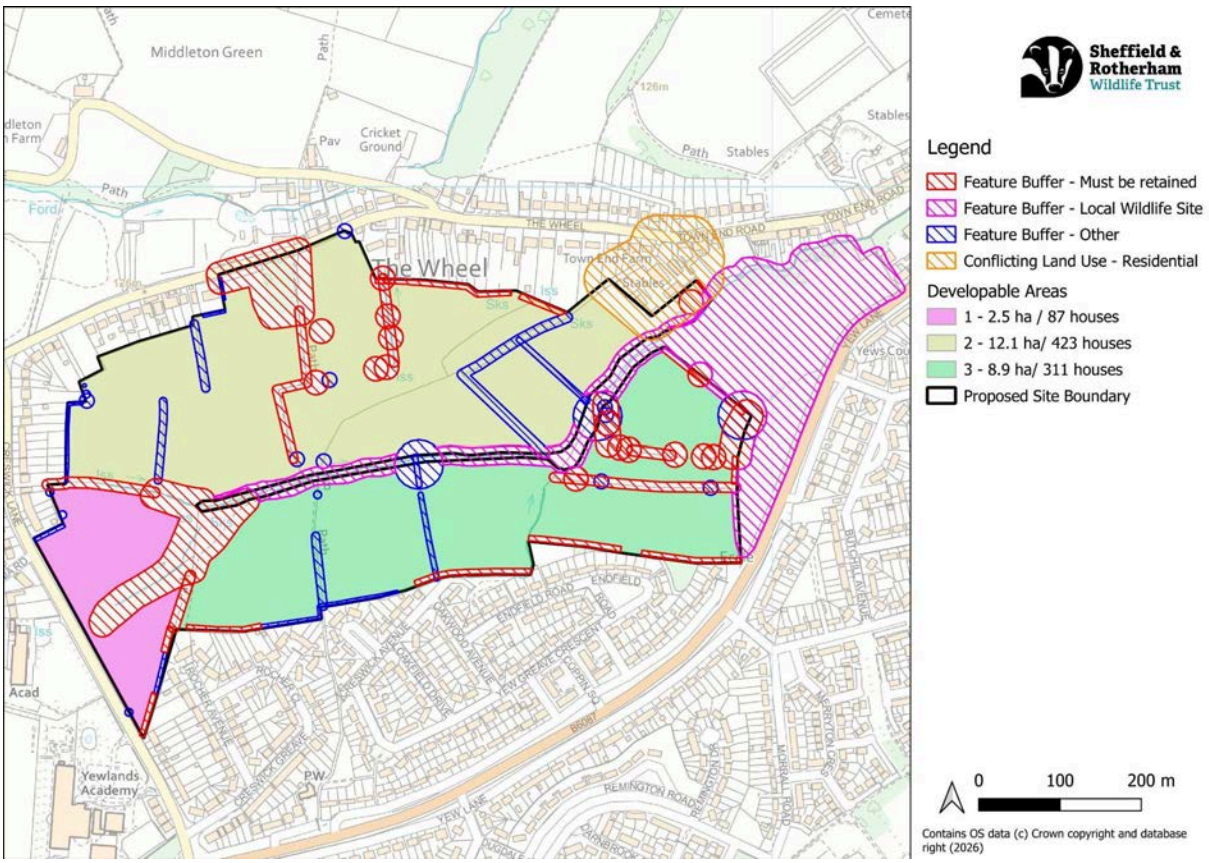
The MMs also refer to access from The Wheel as a potential alternative. However, this assumes that other access routes are deliverable. If those routes are constrained by policy, a more significant access from The Wheel would be required. The MMs do not demonstrate that such an access has been tested or that it could be delivered without further impacts on hedgerows, mature trees or the Local Wildlife Site.

When the requirements of Policy GS5 and GS7 are applied, including the need for wholly exceptional reasons to justify impacts on species-rich hedgerows, together with the Inspectors' direction that there should be no development within Local Wildlife Sites, the site is effectively divided into three distinct zones.

In this configuration, the central area (shown in green on the plan below) becomes inaccessible without breaching one or more of these policy constraints. The MMs do not demonstrate that a policy-compliant access solution exists, nor that wholly exceptional reasons have been established to justify such impacts. As a result, the allocation relies on access assumptions that cannot be delivered in accordance with the Plan's own policy framework.

The MMs also do not demonstrate that ecological and heritage constraints have been fully assessed in combination. Evidence indicates that field boundaries are likely to be medieval in origin and of significant value, supported by enclosure mapping and the presence of ancient indicator species in abundance during an informal spring-time walk over within certain hedgerows and the LWS running through the site. There has been no integrated assessment of these features, nor consideration of their combined ecological and heritage value as potentially irreplaceable habitats.

The policy requirement to "explore opportunities" for ecological corridors does not resolve these issues. This wording is non-specific and does not provide any certainty that connectivity will be maintained, let alone enhanced. The MMs do not set clear standards or demonstrate how ecological function will be preserved.



Taken together, the MMs do not demonstrate that access can be achieved without breaching Policy GS5, damaging potentially irreplaceable habitats or conflicting with the Inspectors' direction on Local Wildlife Sites. As a result, the developable area is likely to be significantly overstated.

MM351 assumes a total site area of **29.80 hectares**, with **16.92 hectares identified as net housing land** delivering **592 dwellings**, alongside **up to 7 hectares for education use** and **4 hectares for a burial ground**. However, once policy-compliant constraints are applied, it is estimated that only around **16 hectares of the site is realistically deliverable**, from which the education and burial uses must still be accommodated.

This would leave approximately **5 hectares available for housing**, equating to around **175–200 dwellings**, significantly below the assumed **592 dwellings**. The MMs do not demonstrate how this discrepancy has been addressed or how the stated capacity can be achieved.

In the absence of clear evidence that access can be achieved without unacceptable harm, and without demonstration of wholly exceptional reasons to justify impacts on species-rich hedgerows and other irreplaceable features, **the MMs do not demonstrate that the allocation is justified or deliverable.**

MM352 - NES38: Holme Lane Farm and land to the west of Grenoside Grange, Fox Hill Road

The MMs fail to demonstrate that NES38 is deliverable in practice once ecological, hydrological and land use constraints are properly applied. The allocation relies on multiple access assumptions and mitigation measures that are either inconsistent with policy or deferred to the planning application stage.

Access is proposed from Fox Hill Road and from Salt Box Lane (via the area adjacent to Grenoside Grange Hospital). The MMs do not demonstrate that both access points can be delivered without unacceptable harm. In particular, access from the Salt Box Lane is likely to interact with hedgerows along the northern boundary. In the absence of a Preliminary Ecological Appraisal (PEA), it is not possible to determine whether these hedgerows are species-rich or potentially irreplaceable, however historic mapping (OS 1850–51 below) identifies the northern boundary as a roadside hedge ("3 ft RH"), confirming that this feature has been present since at least the mid-19th century. When considered alongside enclosure mapping and the observed field pattern, this indicates a long-established boundary which may be of historic origin. The MMs do not demonstrate that this has been assessed in combination with ecological evidence to determine whether the hedgerow qualifies as a priority or irreplaceable habitat. If they are, any removal or fragmentation would require wholly exceptional reasons under Policy GS5 and GS7. The MMs do not demonstrate that this has been assessed.

The MMs also include provision for a pedestrian and cycle route through the Cowper Avenue Greenspace Local Wildlife Site. This is directly inconsistent with the Inspectors' post-hearing direction that there should be no development within Local Wildlife Sites. While the policy seeks to minimise harm and provide compensation, this represents a clear departure from an avoidance-first approach and introduces a fundamental policy conflict. The MMs do not demonstrate how this can be reconciled.

In addition, the requirement for a minimum 15 metre buffer to the Local Wildlife Site is insufficient to manage increased recreational pressure arising from the development. Such buffers provide only basic physical separation and do not address the predictable increase in human and pet activity. This is inconsistent with Policy GS5, which requires impacts to be avoided or minimised. Minimum buffers alone cannot achieve this, and the MMs do not demonstrate how increased recreational pressure will be controlled in practice.

The MMs acknowledge that there is a conflict with other sensitive land uses and again do not demonstrate that required buffers have been accounted for in determining site capacity. This is a fundamental constraint that should be addressed at the plan-making stage as it has, in conjunction with ecological constraints, the potential to influence the viability of the site.

No PEA has been published for this site, despite being referenced during the examination. As a result, the MMs do not demonstrate that key ecological features have been identified or assessed. This includes:

- the potential presence of **species-rich hedgerows** along site boundaries
- the relationship between the site and the **adjacent Local Wildlife Site**
- and the role of the site within the **wider ecological network**

Without this information, it is not possible to determine whether access, layout or mitigation proposals are policy compliant. The reliance on “where possible” and “where feasible” wording further weakens the policy, as it provides no certainty that key features will be retained.

On an informal springtime walkover of the site (publicly accessible areas), we noted several features which would create further constraints without breaches of policy.

These included a small willow copse which contained mature trees, a line of mature trees running along the northern boundary (or just outside the boundary but whose roots protections would impact the developable area) and there is evidence of a spring within the site, located close to the Local Wildlife Site. This feature is shown on the historic OS map below as a ‘well trough’ and is supported by visible evidence of sediment and fluvial erosion extending down through the LWS. Despite this, the Level 2 SFRA and associated site assessment do not identify any surface water feature within the site.

This represents a significant gap in the evidence base. If a spring is present, it may influence:

- site drainage patterns
- groundwater conditions
- and the design and effectiveness of SuDS infrastructure

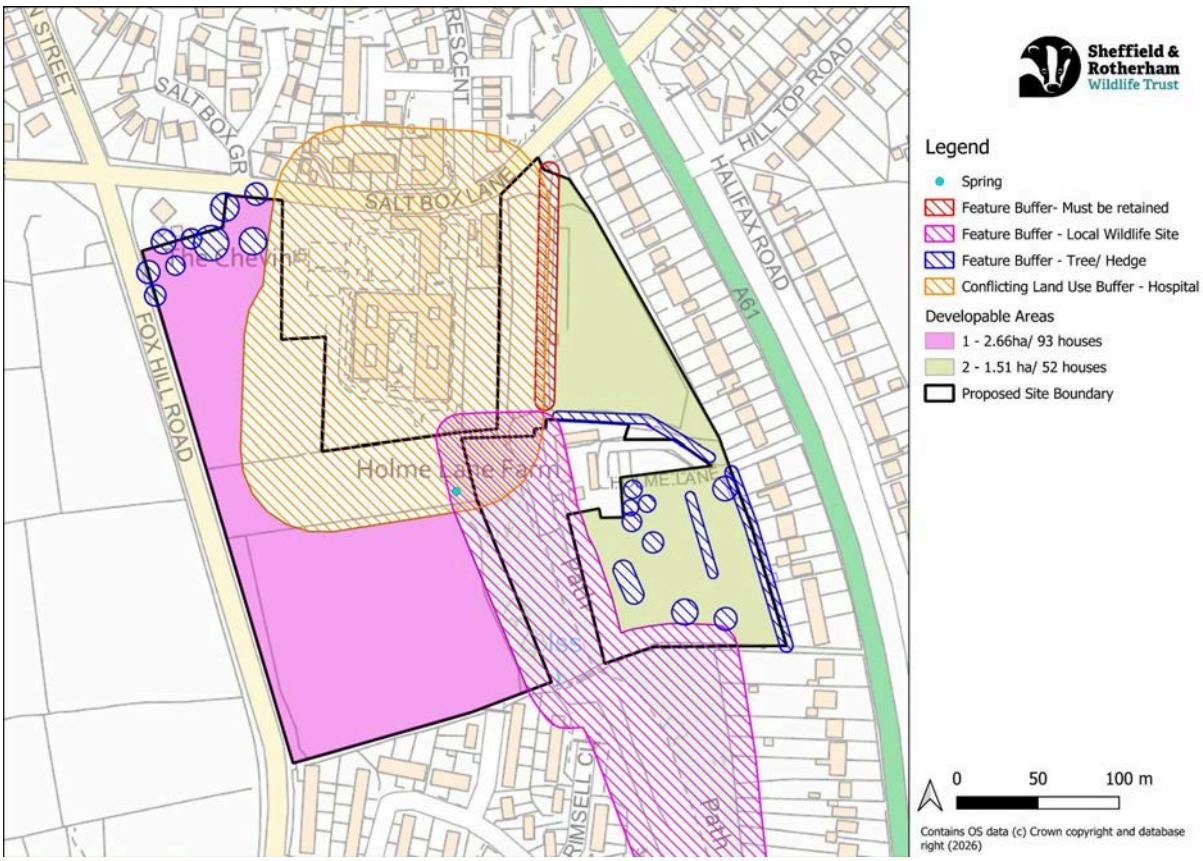
The omission of this feature means that surface water management assumptions are likely to be inaccurate. This has further direct implications for the developable area, as additional land may be required for drainage, buffers or flood mitigation.

The MMs defer these matters to the planning application stage. However, this is a fundamental constraint which may affect both layout and capacity, and should therefore be addressed at the plan-making stage.

The MMs assume a total capacity of **188 dwellings** across **5.38 hectares of net housing land** within a total site area of **6.70 hectares**.

When these constraints are applied, the developable area is reduced to two smaller parcels, as illustrated, with a combined capacity of approximately **145 dwellings** (c.93 + 52 units). This represents a reduction of around **40–45 dwellings** from the capacity assumed in the MMs.

However, if once the hospital buffer is applied, the eastern parcel becomes inaccessible without breaching the very mitigation requirement introduced by MM352. This further reduces the realistic housing capacity to approximately **90–100 dwellings**, based on the remaining accessible western parcel. This is without taking into account any additional reductions arising from the presence of surface water features on the site, which are likely to affect SuDS requirements and further reduce the developable area.



Taken together, the MMs do not demonstrate that NES38 can be delivered without breaching Policy GS5, conflicting with the Inspectors' direction on Local Wildlife Sites, or giving rise to unacceptable impacts on adjacent sensitive receptors.

Key constraints, including access feasibility, ecological value, hydrology and land use compatibility, have not been sufficiently assessed. The reliance on minimum buffers and deferred mitigation does not provide confidence that these issues can be resolved.

As a result, the **MMs do not demonstrate that the allocation is justified, effective or deliverable**.

MM353 - NES39: Land at Wheel Lane and Middleton Lane

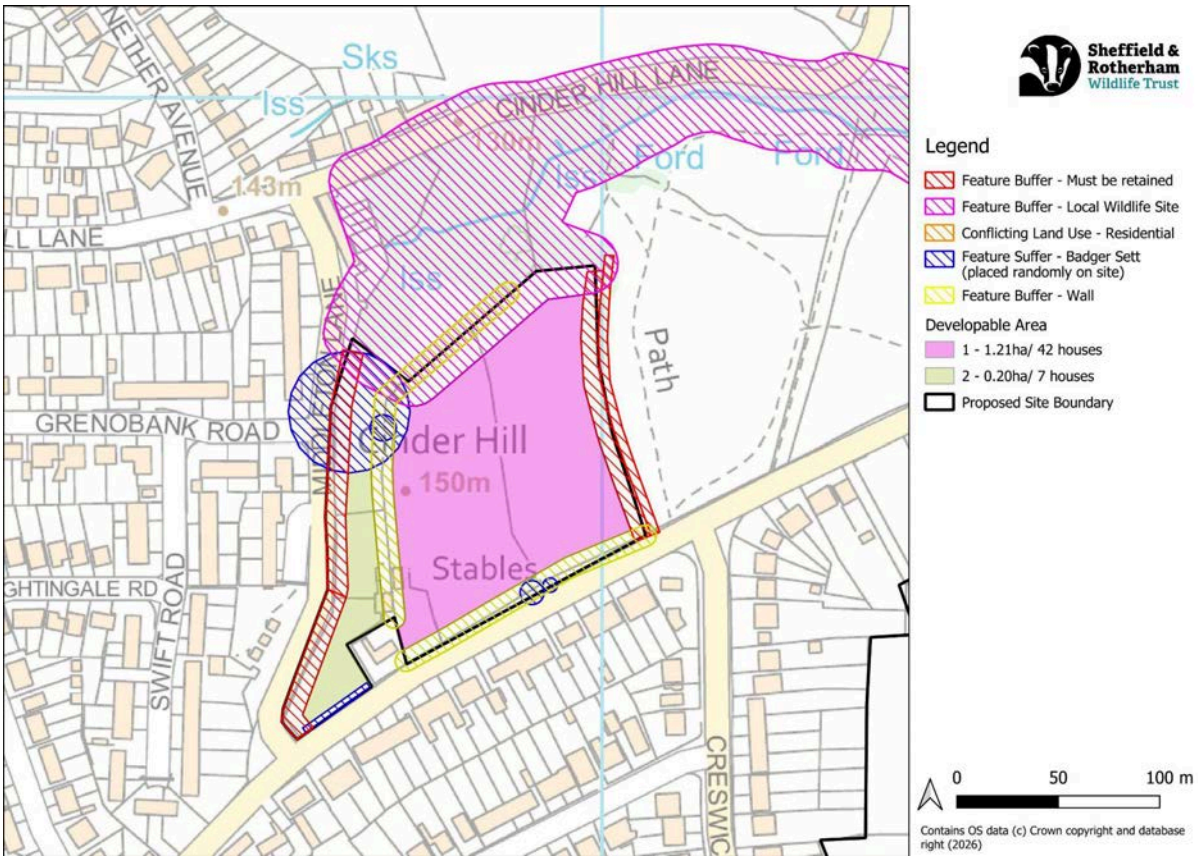
The MMs for NES39 rely on a limited and incomplete ecological evidence base. No Preliminary Ecological Appraisal or Biodiversity Net Gain assessment has been made publicly available for scrutiny, despite reference to such work and confirmation at the hearings that Ancient Woodland is present on or adjacent to the site. This represents a significant gap in the evidence base at the plan-making stage.

Accompanied by the current tenant, we conducted an informal springtime walkover of the site and identified ecological features not reflected in the available documentation. In particular, the hedgerow along the eastern boundary, especially where it meets the Local Wildlife Site, supports an abundance of ancient indicator species. This raises a clear possibility that the hedgerow is ancient and therefore constitutes an irreplaceable habitat. In addition, parts of the site exhibit characteristics consistent with lowland acid grassland, a priority habitat, which has not been assessed or mapped within the Plan.

No integrated ecological and historic landscape assessment has been undertaken to determine whether these features meet the threshold for irreplaceable habitat. In the absence of this baseline, it is not possible to conclude that the impacts of development have been properly understood or that the correct policy tests, including the requirement for wholly exceptional reasons, have been applied.

Taken together, this represents a fundamental gap in the evidence base. The Plan simultaneously requires the retention of the wall, proposes access that may require its breach, and fails to demonstrate that the relevant policy tests have been applied. In these circumstances, it is not possible to conclude that the site can be delivered in accordance with Policy D1 or without harm to potentially irreplaceable features.

Furthermore, the Landscape Review relied upon in support of the MMs does not reflect the current site boundary or scale of the allocation. The assessment explicitly references a larger site area and capacity assumptions derived from the earlier Proposed Additional Sites stage, including a gross site area of 5.30 hectares and associated parcel-based layout . The site has since been significantly reduced in extent, yet the landscape evidence has not been revisited to reflect this change. As a result, the conclusions regarding landscape capacity, visual effects and mitigation are based on a materially different site configuration. This undermines the reliability of the evidence base supporting the Main Modifications, as it cannot be assumed that the reduced site would perform in the same way in landscape or visual terms, particularly where the remaining land is more constrained and more sensitive.



The Plan assumes a capacity of **66 dwellings** across a net developable area of **1.89 hectares**. However, the plan above demonstrates that once policy-compliant buffers and retained features are applied, the developable area is significantly reduced and fragmented. The Local Wildlife Site buffer to the north, the requirement to retain boundary features including the drystone walls, and the presence of additional constraints such as the badger sett and wall buffers, reduce the site to two small and disconnected parcels.

As illustrated, the realistic developable areas equate to approximately **1.21 hectares** (around **42 dwellings**) and a further **0.20 hectares** (around **7 dwellings**), giving a combined capacity of approximately **49 dwellings**. This represents a reduction of around 25% from the assumed capacity and does not take into account further potential constraints arising from the ecological status of the wall or hedgerows, or the unresolved access requirements.

In practice, the fragmentation of the site and the need to retain continuous boundary features may further reduce the effective capacity or render parts of the site undevelopable. The MMs do

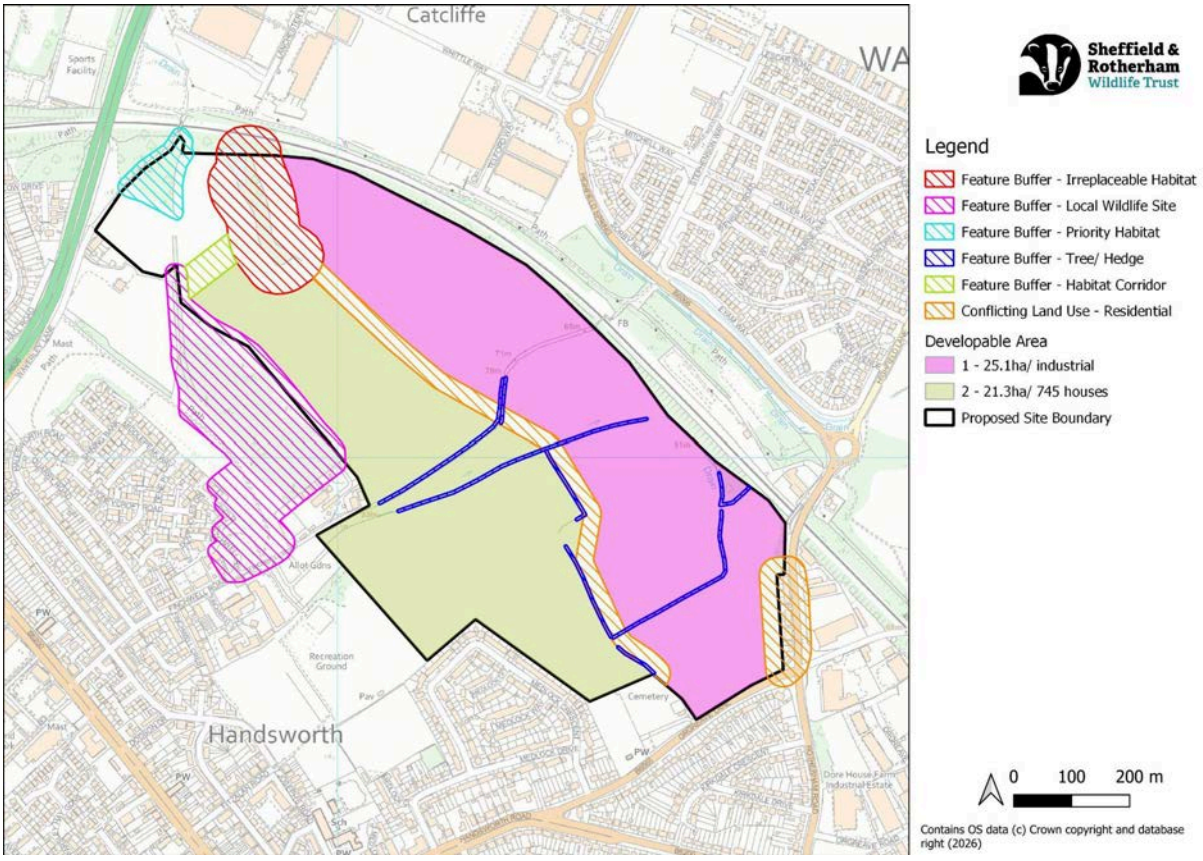
not demonstrate that these constraints have been taken into account in deriving the site capacity, and therefore the figure of 66 dwellings cannot be considered robust.

MM410 - SES29: Handsworth Hall Farm, Land at Finchwell Road

The MMs do not demonstrate that the 'wholly exceptional reasons' test has been applied in relation to impacts on irreplaceable habitats. The site includes Ancient Woodland which, under the proposed allocation, would become effectively isolated from the wider ecological network.

Given the scale and configuration of development, this impact is potentially more significant than at NES36. The woodland would be surrounded by mixed-use development, including substantial employment uses, fundamentally altering its ecological context. National policy is clear that deterioration and isolation of Ancient Woodland should be avoided unless wholly exceptional reasons are demonstrated. The MMs do not provide any site-specific justification to meet this test.

While it may be theoretically possible to maintain ecological connectivity through the provision of a sufficiently wide, functional buffer linking the Ancient Woodland to the adjacent Local Wildlife Site, this would require a substantial area of land to remain undeveloped. In practice, this would remove the northern part of the site from the developable area. The MMs do not demonstrate that such a buffer has been incorporated, nor that the resulting reduction in capacity has been accounted for. In the absence of wholly exceptional reasons and a suitable compensation strategy, development in this location would be contrary to national policy.



The allocation includes a significant employment component (20 hectares) alongside existing and proposed residential development. However, the MMs do not include any requirement for land use buffers between these uses.

This is inconsistent with other allocations, such as CH03, where specific provision is made for land use separation to address amenity impacts. The absence of equivalent requirements at SES29 represents an inconsistent application of policy and suggests that the capacity of the site has been derived without applying the same assumptions used elsewhere in the Plan.

The ecological evidence base for this site is not robust. The original and updated Preliminary Ecological Appraisals were not shared as part of the consultation and are both out of date and the Main Modifications process has not addressed this issue. As a result, the baseline ecological conditions are unreliable. This is a critical omission. If these hedgerows were under-reported and subsequently confirmed as species-rich or ancient, they would attract the highest level of protection under Policies GS5 and GS7 and be subject to the 'wholly exceptional reasons' test. If these circumstances occurred, it is not clear that access or site layout would be achieved without direct harm to these features. The MMs do not demonstrate that this has been tested.

The Plan assumes a capacity of **870 dwellings** and **20 hectares** of employment land across the site. However, the constraints plan demonstrates that once policy-compliant buffers and retained features are applied, the developable area is materially altered.

As illustrated, the realistic developable areas equate to approximately **21.3 hectares** for housing, accommodating around **745 dwellings**, and approximately **25.1 hectares** for employment. This represents a **reduction of around 125 dwellings** from the assumed capacity, even before further detailed constraints are fully accounted for.

Housing and Employment Land Capacity – Implications for Policies SP1 and H1

The Main Modifications to Policies SP1 and H1 rely on housing and employment land capacity figures which assume that allocated sites are largely developable as identified. However, the evidence presented across site-specific representations demonstrates that this assumption is not robust. Ecological constraints, access limitations and land use compatibility requirements have not been fully accounted for at the plan-making stage, despite national policy requiring that site constraints are understood and reflected in allocations.

Across multiple sites, the application of policy-compliant buffers, protection of irreplaceable habitats, and realistic access requirements results in likely substantial reductions in developable area. These are not marginal adjustments but fundamental changes to site capacity and, in some cases, site deliverability, yet the MMs either do not recognise these constraints or defers them to the planning application stage.

The cumulative effect of this approach is clearly evidenced in the site-specific analysis. Once realistic, policy-compliant buffers are applied, developable areas are significantly reduced and, in some cases, sites are rendered undeliverable. This demonstrates that the housing capacity figures underpinning Policy H1 are systematically overstated.

This has direct implications for the soundness of the Plan. A housing trajectory based on inflated site capacities does not provide a reliable basis for meeting identified need. It also undermines the justification for Green Belt release, as sites with significant ecological constraints are brought forward in the absence of a robust assessment of whether less harmful alternatives could meet the requirement.

The correct sequence is to identify constraints, apply necessary buffers and then derive capacity. The approach taken in the MMs reverses this process. By deferring critical constraints

to the application stage, the Plan fails to demonstrate that it can deliver the stated housing requirement without unacceptable harm to biodiversity or reliance on further land release.

In these circumstances, the outcome of the Plan as modified is entirely predictable. Where realistic, policy-compliant buffers and constraints are applied, site capacities will reduce to a level that is unlikely to meet the housing and employment requirements set out in Policies H1 and SP1. This creates an inherent conflict within the Plan. Either the stated level of biodiversity protection, including the requirement to give the greatest weight to irreplaceable habitats such as Ancient Woodland and species-rich hedgerows, is not applied in practice and is reduced to minimum root protection distances, or the anticipated level of development will not be delivered. If the latter occurs, it is equally predictable that any resulting shortfall will be identified at plan review, leading to further pressure for Green Belt release.

In effect, the current approach risks embedding a cycle of over-allocation, under-delivery and incremental loss of Green Belt and ecological networks, arising from the selection of sites whose constraints have not been properly understood or accounted for at the plan-making stage.

Other Main Modifications on Green Belt Release Sites

The detailed issues identified in our December 2025 representations in relation to the remaining Green Belt allocations have not been addressed through the Main Modifications. Due to time and operational constraints, it has not been possible to reassess each of these sites in detail again here. However, we respectfully draw the Inspectors' attention back to those previous submissions. In particular, it is important to ensure that appropriate, policy-compliant buffers to ecological constraints are applied across all sites. Without this, there remains a clear risk that these allocations will also contribute to the systematic overstatement of housing and employment land capacity within the Plan.

Our December 2025 submission can be found here.