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FMM5 – Policy BG1: Blue and Green Infrastructure

We support the intention of FMM5 to strengthen the relationship between Policy BG1 and the South Yorkshire Local Nature Recovery Strategy (SYMCA LNRS), particularly the recognition of mapped Measures and Areas that Could Become of Particular Importance for Biodiversity. However, we are concerned that FMM5 simultaneously removes an important protection introduced through the Main Modifications.

The Main Modified Policy BG1 gives very significant weight to:

"green spaces forming (or with potential to form) wildlife corridors or 'steppingstones' connecting designated ecological sites, particularly those identified in the Local Nature Recovery Strategy."

FMM5 deletes this bullet and replaces it with:

"Where possible, opportunities to maintain or enhance connectivity between designated ecological sites should be taken…"

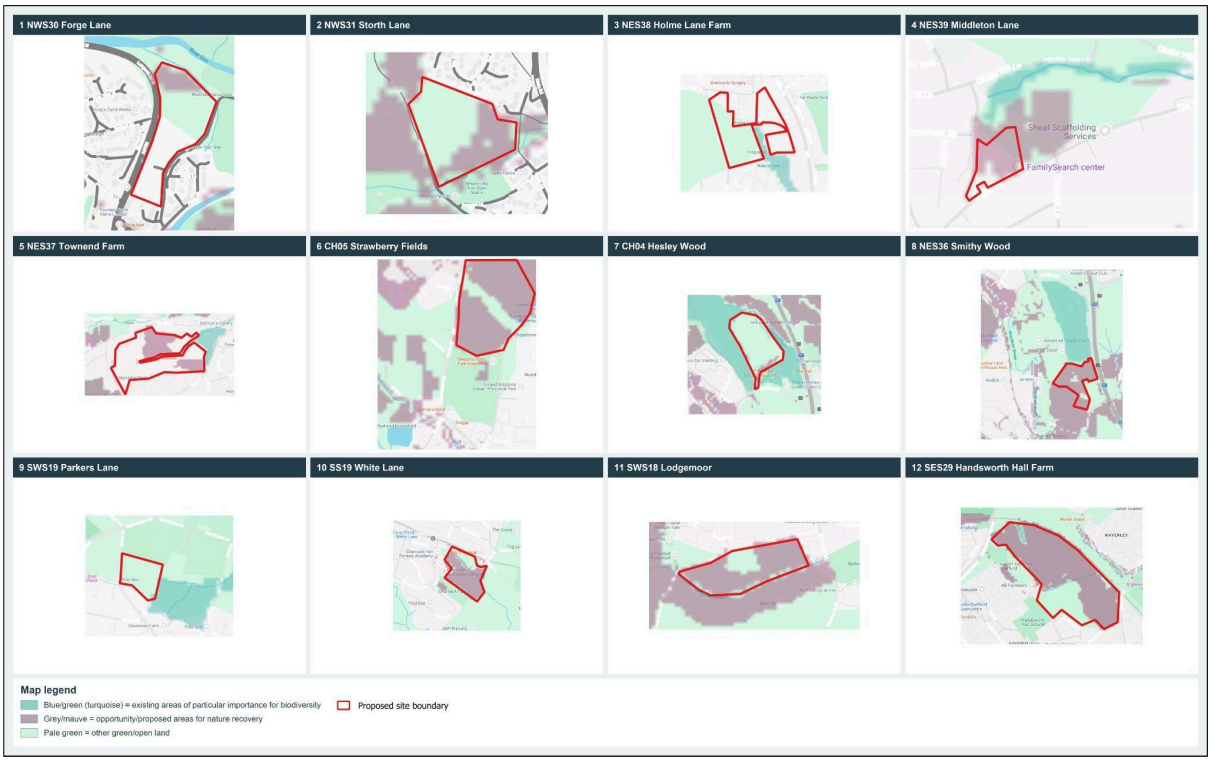
These provisions perform different functions. The Main Modification protects existing and potential ecological connections. FMM5 instead treats maintaining connectivity as an opportunity to be taken "where possible". This risks development requirements determining whether an existing connection can be maintained, rather than important ecological connections being identified first and development designed around them.

There is also a need for clarity about what constitutes a "green space". Ecological connectivity may depend upon a hedgerow or watercourse, but it may equally depend upon a much wider area or mosaic of habitats. Retaining a narrow green strip or individual linear feature does not necessarily maintain the ecological function of the

wider connection. The policy should therefore protect connectivity according to its ecological function and scale, irrespective of the underlying land-use designation.

The deletion of "*or with potential to form*" is also concerning. Nature recovery requires space to restore and reconnect fragmented habitats, including land which may currently have modest ecological value but is strategically important to the future network. Removing this protection appears inconsistent with FMM5's increased emphasis on SYMCA LNRS Areas that Could Become of Particular Importance for Biodiversity.

The significance of this concern is demonstrated by the South Yorkshire emerging LNRS mapping of the 14 Green Belt sites proposed for allocation in the Sheffield Plan. Our examination of these sites identifies 12 which overlap with mapped Areas of Particular Importance for Biodiversity, Areas that Could Become of Particular Importance for Biodiversity, or both.



Collection of images from the SY Local Nature Recovery Maps

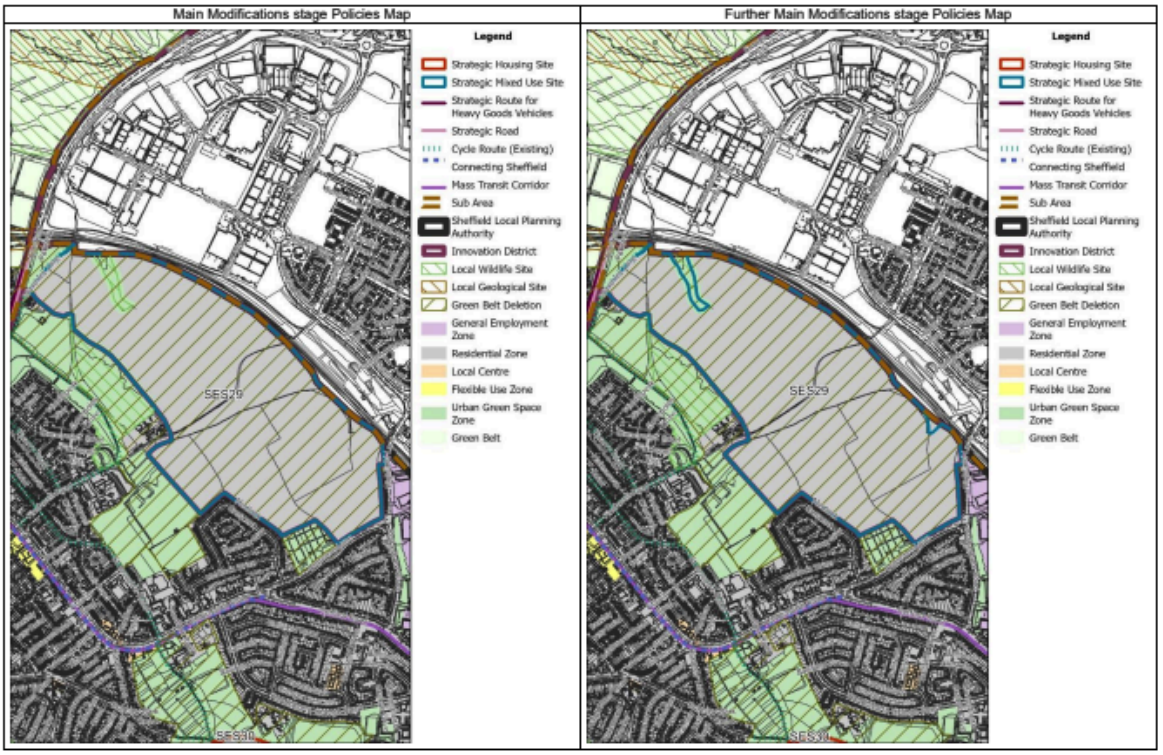
This is not simply a matter of protecting existing habitats. The SYMCA LNRS, which constitutes the best available data pertaining to priority habitats and their condition, identifies land which has strategic importance for restoring and reconnecting fragmented ecological networks, including areas which may not currently support habitats of particularly high ecological value. The overlap with 12 proposed Green Belt allocations demonstrates why the protection of green spaces *with potential to form* ecological corridors or stepping stones is essential. Without this protection, development could permanently remove opportunities to deliver the Local Nature Recovery Strategy, even where individual habitats are retained or compensated for elsewhere.

The practical consequences can be seen at NES36, where the allocation requires opportunities for ecological corridors to be explored and wildlife passage to be provided across the new access road. These measures are not equivalent to maintaining the habitat and ecological functions of an existing corridor. The ecological connection should first be identified and protected, with development then designed around it, rather than the development determining what connectivity is "possible" to retain.

SES29 and Map Change 4 illustrate the related issue of allocation boundaries. Excluding Ancient Woodland or another important habitat from an allocation does not protect it from development of the surrounding land. The indicative masterplans presented at the hearings showed development surrounding the Ancient Woodland in a way that would isolate it from the wider habitat network. The relevant consideration is therefore not simply whether the habitat lies inside or outside the allocation, but what land is necessary to maintain its ecological function and connectivity.

Map change 4 – Associated modification reference: MM410

Description: Amended boundary arising from MM410 for site allocation SES29.



This also requires the habitats providing connectivity to be properly identified. Hedgerows may provide important ecological connections even where they have not been identified as species-rich Priority Habitat, and may prove to be ancient when ecological, historic and landscape evidence is considered together. Similarly, air quality, lighting, noise and other environmental effects should be considered alongside the ecological receptors upon which they act, including their combined and cumulative effects.

FMM5 also fails to resolve the issue of minimum buffers. Without clearer guidance in BG1 and/or GS5, there is a real risk that minimum distances become the standard buffers

applied to development proposals. Appropriate buffers should instead reflect the sensitivity and ecological function of the habitat, its relationship with the wider ecological network, and the likely direct, indirect and cumulative effects of the development. We have provided examples in previous representations of how this could be achieved, including differentiated buffers reflecting the habitat and the type and intensity of development proposed.

We therefore request that the Main Modification bullet giving "*very significant weight*" to green spaces forming, or with potential to form, wildlife corridors or stepping stones is retained. The new FMM5 wording should be additional to, rather than replace, this protection, and amended to distinguish protection of existing connectivity from opportunities for restoration and enhancement:

"Existing important ecological connectivity between designated sites and within the Local Nature Recovery Network should be protected and maintained. Opportunities to restore, enhance and create additional connectivity should be taken, with a focus on mapped Measures and Areas that Could Become of Particular Importance for Biodiversity identified in the South Yorkshire Local Nature Recovery Strategy."

We acknowledge the need to clarify that not every policy listed will be relevant to every type of green infrastructure. However, we are concerned that FMM5 goes further than is necessary to address this issue and, in doing so, weakens the policy test.

The Main Modified wording requires development to "*comply with*" the relevant policies. FMM5 changes this to "*where relevant, be assessed against*" those policies. While "*where relevant*" provides the necessary clarification, requiring a proposal to be assessed against a policy is not the same as requiring it to comply with that policy. This risks changing the effect of the policy rather than simply clarifying which policies apply.

FMM5 also removes the explicit statement that "*valuable greenspaces will be protected from inappropriate built development*". We do not consider that this protection needs to be removed in order to address the issue identified.

We therefore recommend retaining both the explicit protection of valuable greenspaces and the requirement for development to comply with the relevant policies, while incorporating the clarification sought through FMM5. We suggest:

"*Valuable greenspaces will be protected from inappropriate built development. Development affecting Urban Greenspace Zones, Green Belt, Local Green Spaces, greenspaces, outdoor recreational facilities or designated ecological or geological sites should comply with the relevant requirements of Policies SA5, SA6, GS1, GS1A, GS2, GS5 and GS8.*"

FMM16 - Policy GS5: Priority Habitats and Priority Species

We welcome the recognition that Priority Habitats and Species have differing ecological values. However, FMM16 risks weakening their protection by making 'significant weight' the default rather than 'very significant weight' and that this follows a succession of

changes to the policy that have weakened biodiversity protections throughout the Sheffield Plan Process.

The original Regulation 19 policy, published in 2023, established a hierarchy of biodiversity protection. Following the October 2025 examination hearings, SRWT was consulted on a revised draft on 18th December 2025. However, the subsequent Main Modifications (MM185) reduced several of the protections contained in that draft.

The principal reductions are summarised below:

Ecological feature	**Original 2023 policy**	**18th December 2025 draft**	**Main Modifications (MM185)**
Priority Species	Greatest weight	Very significant weight	Significant weight
Priority Habitats	Protected, but no explicit weighting category	Very significant weight	Significant weight
Local Nature Reserves (LNRs)	Very significant weight	Very significant weight	Significant weight

FMM16 now proposes 'significant or very significant weight', determined by site-specific ecological evidence. While this partially addresses our previous objection, it does not restore the original level of protection. Instead, it risks establishing significant weight as the default, with very significant weight only applied where additional ecological value can be demonstrated.

At the examination hearing on 16 October 2025, a question was raised as to whether the Council was applying the nationally defined list of Priority Habitats or using a different list. We subsequently raised this matter in our December 2025 representations but have received no response. This distinction is important because it affects which habitats receive protection under GS5 and how their ecological value and contribution to the wider network are assessed. We therefore request explicit clarification of the definition and list of Priority Habitats being applied.

Priority Habitats and Species should be nationally defined and recognised as being of principal importance for biodiversity conservation. Very significant weight should therefore be the starting point, with any reduction requiring robust site-specific ecological evidence.

This is particularly important in Sheffield, where less than 5% of Priority Habitats are thought to be in good or great condition according to our Nature Recovery Network Maps. These remaining high-quality habitats are fundamental to nature recovery and should receive the greatest weight. Their loss cannot simply be justified through the provision of BNG elsewhere.

Equally, habitat condition alone must not determine ecological value. Established habitats in poorer condition may still provide essential connectivity, support Priority

Species, buffer Ancient Woodland or have exceptional restoration potential. Their importance must be assessed within the wider ecological network, including their contribution to the South Yorkshire Local Nature Recovery Strategy.

Ecological assessments must also consider cumulative impacts. The loss of individual habitats or small populations of Priority Species may appear insignificant in isolation but collectively undermine local biodiversity. This is particularly relevant to species such as skylark, where the loss of individual breeding territories across multiple development sites can progressively erode local populations.

Site-specific evidence must be sufficiently comprehensive to identify these impacts. This includes integrating ecological, historic and landscape evidence where habitats may be ancient or irreplaceable, and assessing the combined effects of air pollution, lighting, noise and disturbance.

The burden of demonstrating why its loss is justified should rest with the applicant, with the mitigation hierarchy properly applied before compensation is considered.

The Council should establish clear, consistent criteria for determining when a reduction from very significant to significant weight is justified. Without an agreed assessment framework, the proposed flexibility risks inconsistent interpretation and application, undermining the effectiveness of Policy GS5. These criteria should be established through the Plan rather than left entirely to individual planning applications.

We recommend that FMM16 is amended to read:

Outside of international and nationally designated sites, Priority Habitats and Species will be afforded very significant weight. A lower level of significant weight will only be afforded where robust site-specific ecological evidence demonstrates that this is justified.

Priority Habitats having already met the government target of good or great condition will be afforded greatest weight.

This approach would retain very significant weight as the default for Priority Habitats and Species, while elevating the less than 5% of Sheffield's Priority Habitats currently assessed as being in good or great condition to greatest weight. These habitats represent a scarce and particularly valuable ecological resource, providing the foundations for wider nature recovery.

The approach would also allow for exceptional circumstances where a reduction to significant weight is justified, subject to robust site-specific ecological evidence assessed against clear criteria established by the Council. Such reductions should be the exception rather than the norm.

This provides a proportionate, evidence-led and clearly defined hierarchy of protection, recognising the importance of Priority Habitats while allowing appropriate flexibility where genuinely justified.

FMM29: SS19 White Lane

We welcome the introduction of more detailed buffer requirements for ancient and veteran trees, other trees and hedgerows within FMM29. However, we object to the removal of the previously specified 15-metre buffer on either side of Robin Brook and to the inconsistent application of ecological buffer requirements across the Plan's site allocations.

The original requirement provided a more appropriate level of protection for the watercourse and its associated riparian habitats. Ecological buffers must account not only for the physical extent of habitats but also for the effects of development, including recreational pressure, trampling, artificial lighting, disturbance and domestic encroachment. A minimum 3-metre buffer for minor watercourses cannot be assumed to provide adequate protection for these functions. Furthermore, the classification of a watercourse as minor does not necessarily reflect its ecological importance or the extent of its riparian corridor.

We also question why the detailed protections now proposed for ancient and veteran trees and other ecological features at SS19 are not consistently specified across other allocations. For example, NES37 (Yew Lane) contains ancient and mature trees, a watercourse and significant riparian habitats, yet MM351 specifies only an 8-metre watercourse buffer without equivalent detailed requirements for these associated features. Realistic minimum buffers should be established at the Local Plan stage, taking account of habitat sensitivity and impacts including pollution, lighting, noise and disturbance, not just root protection. Site-specific assessments should determine whether wider buffers are necessary.

This inconsistency reinforces our longstanding concern that the Plan has not adequately demonstrated that the proposed development capacities can be achieved while delivering the ecological protection required. Where appropriate buffer widths are deferred until the planning application stage, the extent of developable land remains uncertain. The Council cannot reliably demonstrate that its stated housing capacities are achievable without first identifying and incorporating the necessary ecological constraints.

We therefore request that the much more suitable 15-metre minimum buffer along Robin Brook is retained, alongside the additional habitat-specific protections proposed in FMM29. We also request that this is reflected across other relevant allocations and equivalent ecological features receive consistent protection, supported by site-specific evidence, and that the necessary buffers are reflected in calculations of developable areas and housing capacities.

FMM31: CH04 Hesley Wood

We strongly object to FMM31 and maintain the fundamental concerns raised in our previous representation to MM460.

The proposed modification fails to resolve the ecological and deliverability constraints affecting CH04. Instead, it further weakens the restrictions on development outside the Industrial Zone, while expressly acknowledging that works within Hesley Wood Local Wildlife Site (LWS) are necessary to deliver the allocation.

- Conflict with the Inspectors' direction

Paragraph 26 of the Inspectors' post-hearings letter (EXAM 213, 16 January 2026) states that allocation policies affecting Local Wildlife Sites should specify that "*no development shall take place within the LWS*", together with appropriate ecological buffers.

FMM31 remains in conflict with this approach. Rather than protecting the LWS from development, the allocation expressly requires highway access through it, together with ground remediation and remodelling works. A similar concern arises at NES37, Land off Yew Lane, where highway access is also proposed through a Local Wildlife Site, although in that case it would not be the sole means of access, we have previously demonstrated that a large area of the site would be inaccessible without damaging species-rich and possibly ancient hedgerows. Both allocations raise concerns about the effectiveness and consistent application of policies intended to protect designated wildlife sites from development.

The Council has not demonstrated why this departure from the Inspectors' stated approach is justified.

- Unavoidable ecological harm

This allocation presents a fundamentally different situation from most others where the Council has argued that ecological impacts can be avoided or adequately mitigated through development design and planning conditions.

Here, the Council expressly acknowledges that development within the LWS is necessary to deliver the allocation and anticipates unavoidable harm requiring compensation.

The distinction is critical. Rather than demonstrating that ecological harm can be avoided, the allocation is predecided upon accepting harm to a designated wildlife site, which contains Ancient Woodland, as a necessary consequence of delivering employment development.

Compensation for residual harm is not equivalent to avoiding that harm. Nor does the provision of compensation automatically demonstrate compliance with the mitigation hierarchy or justify the selection of the site.

We consider the Council's approach particularly inconsistent given its repeated responses to ecological objections elsewhere in the Plan. The Council has frequently maintained that detailed ecological protections should be determined at the planning application stage, rather than specified within individual site allocations.

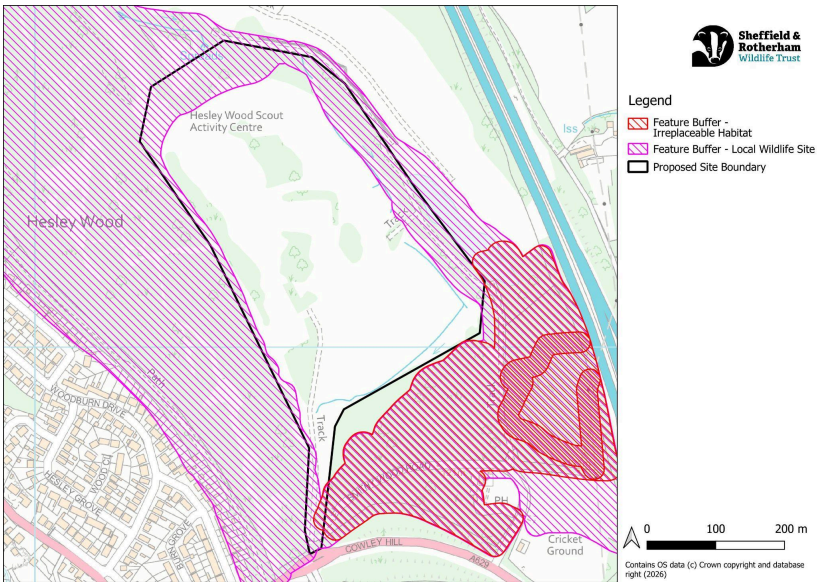
Yet, in the case of CH04, the Council is prepared to be highly specific at the allocation stage where this facilitates development within a designated wildlife site, expressly identifying the necessary works and anticipating unavoidable harm requiring compensation.

Where the Council has sufficient evidence to conclude that such impacts are unavoidable, it should also be required to demonstrate that the mitigation hierarchy has been properly applied and that the allocation is justified and deliverable in accordance with the Plan's environmental policies.

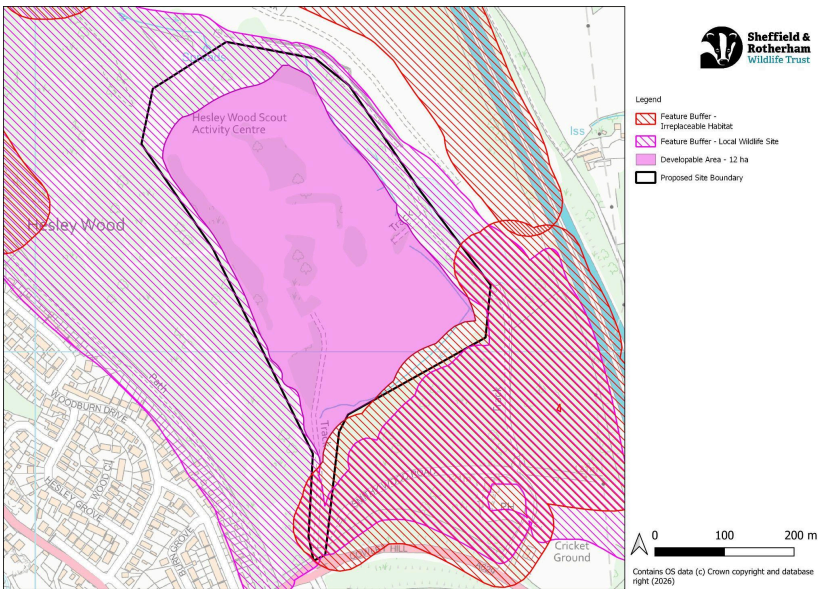
The planning application stage should not be relied upon to resolve fundamental ecological conflicts that the Council has already identified during plan preparation.

- Ancient woodland and deliverability

As demonstrated in our previous representation to MM460, the proposed access arrangements would potentially encroach upon the 15 metre root protection zone of adjacent ancient woodland.



This minimum buffer does not account for the additional protection potentially required against air pollution, noise, lighting and disturbance associated with HGV-intensive employment development. We reiterate that 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 demonstrated below.



Ancient woodland is an irreplaceable habitat. Where development would result in its loss or deterioration, the NPPF requires wholly exceptional reasons and a suitable compensation strategy.

We remain extremely concerned that the Council continues to pursue an allocation at CH04 where deliverability appears to depend upon compromising fundamental ecological protections. Natural England's standing advice requires the potential impacts of development near ancient woodland, including air pollution, noise, artificial lighting and other indirect effects, to be properly considered and addressed. In addition, the Sheffield Plan's own Managing Air Quality policy (ES5) expressly acknowledges in paragraph 3.15 that "Aerial emissions and poor air quality can also have a negative impact on the natural environment and biodiversity". Yet, as demonstrated in our previous representations, it remains unclear whether the proposed access can be delivered without causing direct damage to the root systems of ancient woodland trees. What is clear, however, is that the proposed access would introduce HGV traffic and associated air, noise and light pollution immediately adjacent to ancient woodland, with no demonstrated means of adequately avoiding or mitigating these impacts. We question how the Council can continue to regard this allocation as justified and deliverable when its essential access arrangements appear to conflict with the very ecological protections the Plan is intended to uphold.

The Council's approach to this allocation also raises serious questions about how consistently these ecological protections will be applied across the other proposed allocations, particularly those involving major development adjacent to ancient woodland, Local Wildlife Sites and other sensitive habitats. If an allocation can proceed despite unresolved questions about direct damage and the absence of demonstrated measures to avoid or mitigate foreseeable air, noise and light pollution, it risks establishing an approach in which ecological safeguards are treated as matters to be negotiated at planning application stage rather than fundamental constraints on site selection and deliverability. This would undermine confidence in the effectiveness of the Plan's biodiversity policies and their consistent application across Sheffield.

These concerns are not confined to CH04. At NES36 Smithy Wood, the proposed HGV-intensive employment development would effectively isolate ancient woodland from the wider ecological network, with reliance on provisions for wildlife crossings that do not adequately address the woodland's wider ecological functions or its exposure to air, noise and light pollution. At SES29 Handsworth, the indicative masterplan presented at the examination hearings similarly showed ancient woodland becoming isolated within the proposed development. Although assurances were given that ecological connectivity would be retained, SRWT's subsequent ecological constraints assessment demonstrated that providing meaningful habitat corridors and appropriate buffers would substantially reduce the land available for development, with significant implications for the proposed housing and employment capacity. These examples, alongside CH04, raise serious questions about whether the allocations have been assessed against realistic ecological constraints and whether their stated development capacities are achievable while complying with the Plan's own biodiversity policies. This then calls into question whether the affected allocations are justified, effective and consistent with national policy, and therefore whether they meet the tests of soundness.

- Weakening of the allocation condition

FMM31 proposes replacing *"built development will only take place"* within the Industrial Zone with *"new buildings will only be constructed"* within that zone.

This is a substantive weakening. The revised wording potentially allows other forms of development outside the Industrial Zone, including roads, hardstanding, service yards and engineering operations.

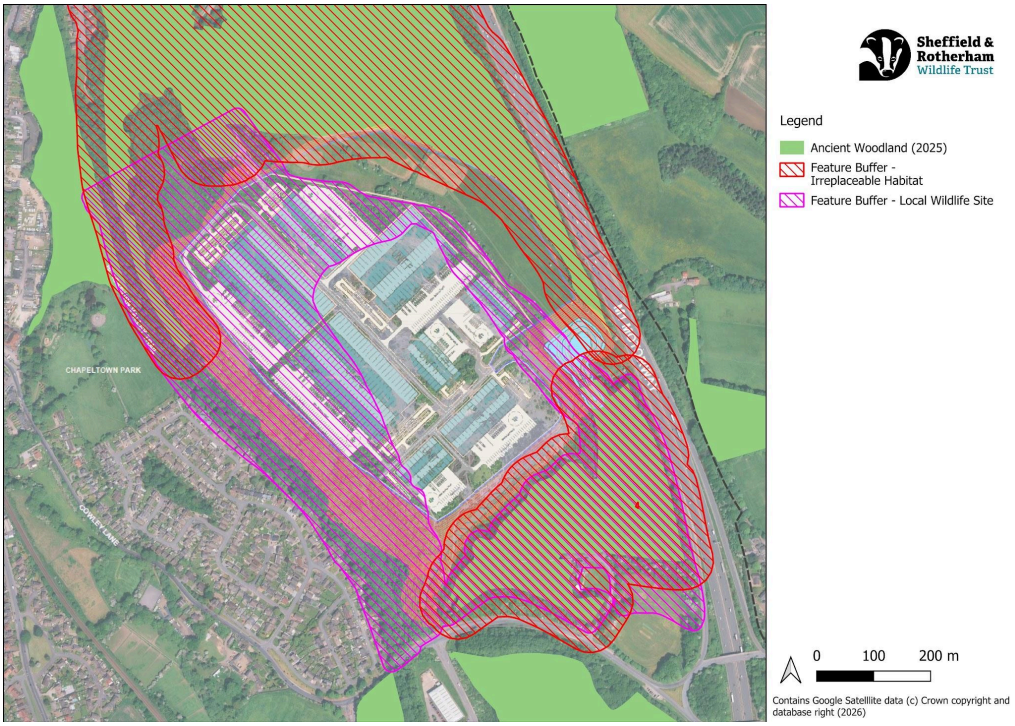
The significance of this change is illustrated by Rula Developments' own proposed *Elevate* scheme. An illustrative masterplan, publicly available by 19 June 2025, shows extensive warehouse development, hardstanding, service yards, internal roads and associated infrastructure.



Illustrative masterplan for Elevate, Hesley Wood, as promoted by Rula Developments.

Although Rula's masterplan is illustrative, it indicates the types and extent of development that could potentially be enabled outside the Industrial Zone by the proposed change in wording.

An approximate overlay of Rula's illustrative masterplan onto the ecological constraints plan submitted with our MM460 representation indicates significant potential overlap between elements of the proposed development and environmentally sensitive areas, including the mapped minimum buffer for ancient woodland. Although the overlay is illustrative and does not establish precise development boundaries, it reinforces the need for clear, enforceable restrictions on development outside the Industrial Zone.



- Impact on the SY Local Nature Recovery Strategy

This LWS surrounding this allocation has also been identified as an area of existing importance for nature on the SYMCA LNRS, while the SYMCA LNRS may be an unadopted draft strategy, the underlying baseline evidence mapped should not be dismissed, these maps expose existing, high-value ecological assets, explicitly evaluating them is a legal necessity to satisfy the NPPF's mandatory mitigation hierarchy which strictly requires avoiding harm to baseline habitats like Local Wildlife Sites before considering development and to ensure local plan allocations are backed by the best available evidence rather than risking undeliverable, unviable developments.

Similarly, opportunity areas physically connected to Local Wildlife Sites represent the essential corridor infrastructure required by the NPPF to maintain functional ecological networks. By allocating development proposals across these critical linkages, the council risks violating the mitigation hierarchy by severing ecological buffers, destroying prime locations for nature recovery, and raising serious questions about whether the

allocation is justified and deliverable while meeting the ecological protection requirements of national planning policy.



SYMCA LNRS Map showing areas of existing importance and opportunity/proposed areas for Nature Recovery

The above maps demonstrate that the LWS surrounding the allocation is identified as an existing Area of Particular Importance for Biodiversity, while the proposed access crosses an area identified as an opportunity for nature recovery. This reinforces concerns about the potential impacts of the allocation on existing biodiversity and future ecological connectivity, raising questions about its consistency with the NPPF's requirements to protect and enhance ecological networks and whether these constraints have been adequately considered in assessing the allocation's soundness and deliverability.

- Conflict with the Plan's environmental policies

The allocation also raises significant concerns regarding consistency with the Sheffield Plan's own environmental policies, particularly:

- GS5: Protection of Local Wildlife Sites and application of the mitigation hierarchy.
- BG1: Protection and enhancement of ecological networks and habitat connectivity.
- ES5: Recognition that aerial emissions can negatively impact biodiversity.
- GS1: Protection of Urban Green Space Zones.
- GS7: Protection of trees and woodland, including ancient woodland.

- GS6: Biodiversity net gain, which should not substitute for avoiding ecological harm.

While site-specific allocation policies can address particular development constraints, the Council must demonstrate that the allocation is justified and capable of operating consistently with the Plan's wider policies and national policy.

CH04 expressly requires development within a Local Wildlife Site and Urban Green Space Zones, together with engineering works affecting Green Belt land, while potentially threatening adjacent ancient woodland. The Council has not demonstrated how these works can be undertaken without conflicting with the Sheffield Plan's own environmental policies or national planning policy.

We request that FMM31 is rejected and that the Inspectors reconsider the soundness of CH04. The Council has expressly acknowledged that delivering this allocation requires development within a designated Local Wildlife Site, yet has not demonstrated that the resulting ecological harm, potential impacts upon ancient woodland and conflicts with the Plan's environmental policies can be satisfactorily addressed. These fundamental constraints should be resolved at the allocation stage rather than deferred to a future planning application.

Consequential changes to the Sheffield Plan Policies Map as a result of proposed Further Main Modifications

Map Change 3: NES38

We are concerned that the proposed amendment to the boundary of allocation NES38 has not been accompanied by sufficient ecological information to demonstrate that the change would avoid adverse impacts on existing habitats and ecological connectivity.

We have not been provided with, or been able to identify, ecological survey reports assessing the implications of the revised allocation boundary.

Historic Ordnance Survey mapping from the 1850s identifies established field boundaries in this location, while subsequent aerial photography demonstrates the continued presence of mature hedgerows and trees associated with the historic landscape.

We are particularly concerned that the amended boundary may affect a surviving historic hedgerow.

In the absence of adequate ecological evidence, it is not possible to establish whether the proposed boundary amendment would result in the loss, fragmentation or deterioration of these features.

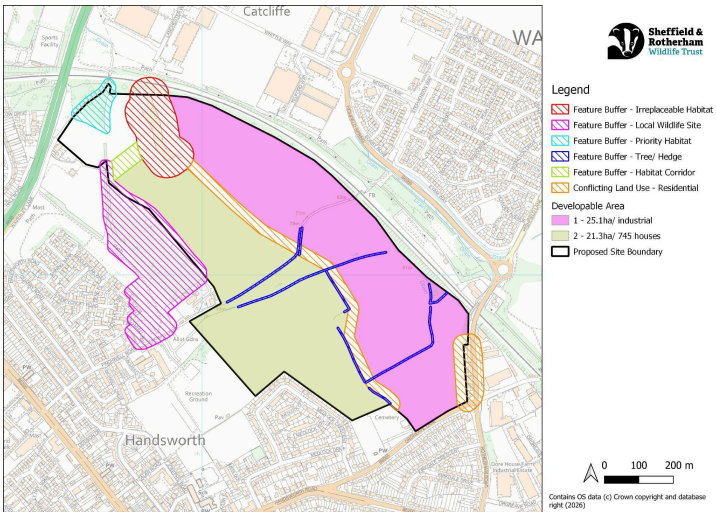
We therefore request that the Council provides the ecological evidence supporting the amended boundary and demonstrates that existing hedgerows, mature trees and ecological connectivity have been appropriately considered.

Where necessary, the allocation boundary should be adjusted to secure the retention and appropriate protection of these features.

Map Change 4: SES29 Handsworth

We remain concerned about the treatment of ancient woodland within the allocation boundary for SES29 and the implications of the successive changes to the Policies Map.

The original allocation boundary followed an extremely irregular alignment, apparently designed to exclude ancient woodland from the developable area. As demonstrated in the ecological constraints map submitted with our Main Modifications representation, the ancient woodland cannot be considered in isolation from the wider ecological network. Our assessment identified the need for appropriate buffers around ancient woodland, Priority Habitats, Local Wildlife Sites and existing hedgerows, alongside the retention of functional habitat corridors. These constraints substantially affect the land available for development and are essential to prevent the ancient woodland becoming completely isolated within the proposed development.



The subsequent Main Modifications map appeared to incorporate the ancient woodland within the allocation boundary, providing a more realistic representation of its relationship with the surrounding development. The September 2026 consequential change now seeks to exclude it once again.

These successive changes raise questions about how the ancient woodland and its associated ecological constraints have been treated within the assessment of the allocation.

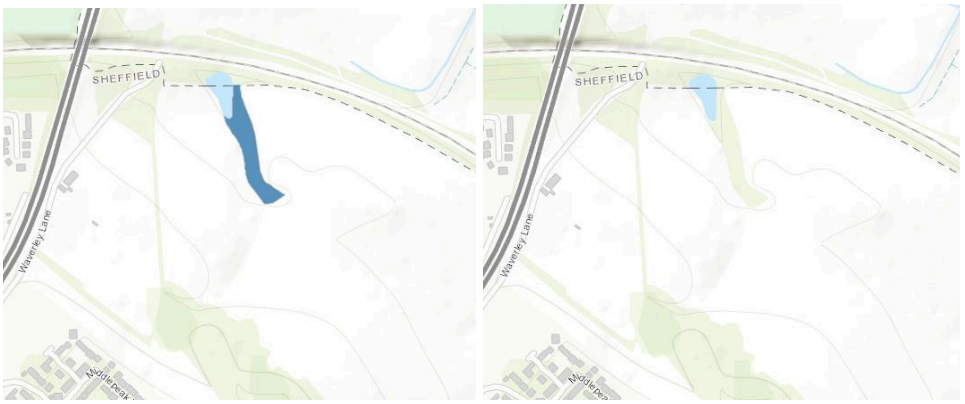
In particular, it is unclear whether the original assessment adequately considered the potential effects of development immediately adjoining ancient woodland, or whether excluding the woodland from the allocation boundary has influenced the assessment of developable land, environmental impacts and the mitigation required.

These concerns are reinforced by the EIA scoping request submitted for SES29, which fails to correctly identify the ancient woodland. This may reflect the continued

availability of older Ancient Woodland Inventory mapping alongside the updated inventory, which incorporates more recent survey evidence. Our representations have relied upon the updated mapping. The apparent discrepancy raises questions about whether the ecological assessments informing the allocation have consistently used the most up-to-date evidence.

Link to the Ancient Woodland Inventory with the latest survey information

Link to the Ancient Woodland Inventory with older survey information



Images taken from the 2 versions of the AWI

Ancient woodland cannot be adequately protected simply by drawing an allocation boundary around it. Development immediately adjacent to the woodland may result in significant indirect effects, including artificial lighting, air pollution, noise, hydrological changes and disturbance. Appropriate buffers and ecological connectivity must be considered irrespective of whether the woodland falls inside or outside the allocation boundary. Furthermore, the woodland is identified within the South Yorkshire Local Nature Recovery Strategy as an existing Area of Particular Importance for Biodiversity, providing further recognition of its ecological significance.

We therefore request clarification of the rationale for the successive boundary changes and confirmation that the ecological assessment of SES29 has consistently considered the ancient woodland and the wider ecological constraints identified in our Main Modifications representation. The Council should demonstrate how the proposed development can accommodate the necessary habitat buffers and ecological corridors without compromising the integrity and connectivity of the remaining habitats.

The exclusion of ancient woodland from the allocation boundary should not be used to understate the potential environmental effects of the allocation or the mitigation necessary to safeguard this irreplaceable habitat.

Integrated Impact Assessment (IIA): Sustainability Appraisal Note, September 2026

In light of our comments above, we question the conclusion reached in the accompanying Integrated Impact Assessment (IIA) that none of the proposed

modifications is likely to give rise to significant additional environmental effects, either individually or cumulatively.

In particular, we consider that the screening assessment does not adequately recognise the potential consequences of weakening ecological safeguards within the Plan.

FMM5 (Policy BG1): removes the explicit provision giving very significant weight to the protection of wildlife corridors and stepping stones connecting designated ecological sites. However, the IIA characterises this modification as providing greater confidence that significant negative environmental effects will be avoided. This fails to adequately consider the implications for ecological connectivity, including habitats outside designated sites that are essential to the functioning of Sheffield's wider ecological network.

FMM16 (Policy GS5): similarly raises concerns regarding the weight afforded to Priority Habitats and Species. The potential consequences of weakening these protections, particularly for habitats already in unfavourable condition, should be considered within the assessment.

FMM31 (CH04 Hesley Wood): changes the restriction on development outside the Industrial Zone from *built development* to *new buildings*. As detailed in our representation, this potentially enables a substantially wider range of development within environmentally sensitive areas, including land associated with a Local Wildlife Site and ancient woodland. The IIA should assess the implications of this substantive change rather than relying solely on the Council's stated intention to accommodate the access road.

Map Change 4 (SES29 Handsworth): The successive changes to the allocation boundary raise concerns about how ancient woodland and its associated ecological constraints have been assessed. As demonstrated in our Main Modifications representation, excluding ancient woodland from the allocation boundary does not address the need for appropriate buffers and ecological connectivity to prevent its isolation. The IIA should demonstrate that these constraints, their implications for the developable area and the potential indirect and cumulative ecological impacts have been adequately assessed.

We are particularly concerned that the IIA concludes, at paragraph 2.5, that the modifications are unlikely to give rise to significant effects when considered in combination, without demonstrating how the cumulative consequences of weakening protections for designated sites, Priority Habitats and ecological connectivity have been adequately evaluated.

We therefore consider that the conclusion that no further detailed assessment is necessary is insufficiently justified. We request that the IIA screening is reconsidered, particularly in relation to FMM5, FMM16 and FMM31, and that the potential individual and cumulative effects on biodiversity, ecological connectivity and irreplaceable habitats are properly assessed before the Plan is finalised.

Reasonable alternatives, urban capacity and Green Belt release

We remain concerned that the IIA does not adequately demonstrate how the cumulative evidence of additional urban development opportunities has informed the justification for releasing Green Belt land.

During the examination, EXAM 141, identified approximately 80 potential urban and brownfield sites with an estimated capacity of 3,783 dwellings. Six further urban sites were subsequently promoted by developers and landowners, which the Council has now assessed following the Inspectors' request.

The Council maintains that development on these sites would contribute to its existing windfall allowance. However, this does not adequately explain how the identified opportunities have been considered collectively when assessing reasonable alternatives to Green Belt release.

This is particularly important given the substantial reliance on windfall development within the housing supply, including 4,675 dwellings from large-site windfalls alone.

These concerns are reinforced by the age of the evidence underpinning the assessment of urban capacity. Sheffield's Brownfield Register has not been updated publicly since December 2023, and the Council has indicated that a further update will follow publication of the Inspectors' report. Regulation 17 of the Town and Country Planning (Brownfield Land Register) Regulations 2017 requires registers to be reviewed at least annually, while national Planning Practice Guidance emphasises the importance of identifying new sites, including windfall opportunities. Given that the justification for Green Belt release depends partly on the availability of suitable urban alternatives, we question why publication of updated evidence is being deferred until after the Inspectors have reported, and request clarification of when the statutory annual reviews were undertaken and what additional development opportunities they identified.

Furthermore, actual windfall completions during the early years of the Plan raise questions about the continued appropriateness of the housing trajectory assumptions, particularly the absence of any forecast large-site windfall contribution until 2031/32. The Council should demonstrate how actual delivery, emerging urban opportunities and sites removed from allocation have been accounted for when assessing the continuing need for Green Belt release.

The updated IIA also identifies significantly greater adverse effects on agricultural land at several strategic Green Belt locations, including Handsworth and Grenoside/Ecclesfield.

Therefore we question whether it is sufficient to conclude that the preferred strategy remains unchanged without clearly demonstrating how the additional urban capacity,

existing windfall assumptions and increased environmental costs of Green Belt development have been considered together.

We recognise that not all identified urban sites will be suitable or deliverable, and that potential capacity cannot simply be added to existing housing supply figures. Nevertheless, the evidence warrants a transparent reassessment of reasonable alternatives, particularly where Green Belt allocations would result in significant ecological harm.