

Sheffield Plan Examination

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By email via the Programme Officer

16 January 2026

Dear Mr. Johnson,

Sheffield Plan examination – Stages 3 and 4 post hearings letter from the Inspectors

Thank you for the Council's contributions and assistance at the hearing sessions held in 2024 and 2025. Following the completion of the Stage 3 and 4 hearing sessions and further consultation on a number of documents we are writing to set out our views on the way forward for the examination.

Overall, we consider that, subject to main modifications, the Plan is likely to be capable of being found legally compliant and sound. A number of main modifications which are necessary for soundness reasons were discussed at the hearing sessions and are referenced in the Council's running list of main modifications/actions from the hearing sessions (documents EXAM 61, 115, 195 and 198). A number of potential main modifications were also outlined in the Inspectors initial post-hearings letter (EXAM 120). These proposed changes are not re-rehearsed here.

Following the close of the hearing sessions and completion of the recent consultation event, we consider that a small number of further main modifications are necessary for reasons of soundness. The further changes are briefly covered in Annex 1 below. Full reasoning and conclusions will be set out in the Inspectors final report.

The Council is now invited to prepare an updated comprehensive set of proposed main modifications for the Inspectors consideration prior to publication, based on the changes referenced in EXAM 61, 115, 195 and 198, the initial post hearings letter and this letter. The modifications will need to be subject to Sustainability Appraisal and Habitats Regulations Assessment as necessary and published for consultation for the statutory period. The documents should also be accompanied by a schedule of any associated changes to the Policies Map.

In producing the proposed main modifications document, the Council is requested to liaise with the Inspectors via the Programme Officer regarding projected timescales and formatting.

The comments in this letter are based on the submitted written evidence and representations, and all that has been heard at the hearing sessions. However, the examination has not yet concluded, and consultation on main modifications has yet to take place. We will have regard to all comments made during the forthcoming consultation when writing the final report. Consequently, the findings in this letter are without prejudice to our final conclusions on the Plan.

The final Inspectors report will set out conclusions on the main issues discussed at the hearing sessions and will be published in due course.

It would be appreciated if the Council could confirm if it is content to proceed on the basis outlined in this letter. Please note that we are not expecting to receive or accept comments from any other parties on the contents of this letter.

A copy of this letter should be placed on the Council's website and made available on request.

Katie Child
David Troy
Rosie Morgan

INSPECTORS

Annex 1

Housing need/requirement

1. The submitted Plan sets out a net housing requirement of 2,040 dwellings per annum (dpa). This is lower than the Government's standard methodology local housing need figure of 3,018 dpa including 35% city uplift, and the 'baseline' local housing need figure of 2,236 dpa. In the Inspectors initial post hearing letter (EXAM 120) we advised that, in the case of Sheffield, the baseline housing need figure of 2,236 dpa represents a justified and reasonable housing requirement which should be reflected in the Plan. It was also concluded that the Plan period 2022 to 2039 represents a pragmatic and reasonable approach. Further detail and reasoning is set out in our initial post hearings letter.
2. The Council subsequently published document EXAM 124 which proposes delivering the higher housing requirement of 2,236 dpa, equating to 38,012 dwellings over the period 2022-2039. Taking account of all the evidence and representations before us, our view is the proposed increased rate is justified and necessary for soundness. It would enable the city to respond to identified local housing needs and support forecast employment growth. Furthermore, as set out in the following section, we are satisfied that the Council has demonstrated that exceptional circumstances exist in principle to justify the release of Green Belt land to deliver this level of housing growth. Full reasoning and details on these matters will be set out in our final report.
3. The Council's updated housing trajectory in EXAM 181 proposes a stepped requirement based on two rates (1,780 dpa from 2022/23 to 2030/31 and 2,750 dpa from 2031/32 to 2038/39). Overall, we consider that the stepped rates are justified. The Plan includes a supply of homes on strategic sites which are likely to be delivered later in the Plan period. The stepped rates broadly reflect step changes in the level of housing expected to be delivered across the Plan period. In the 'housing supply' section below it is concluded that the plan is capable of delivering sufficient housing to meet the overall higher housing requirement. Full reasoning relating to stepped requirements will be set out in our final report.
4. Main modifications will therefore be necessary to reference the higher net total housing requirement figure and the stepped rates in Policy SP1 in Part 1 of the Plan.

Employment need/requirement

5. The submitted Plan sets out an employment requirement of 12.9 hectares per annum. In the Inspectors initial post hearing letter, we advised this figure was not justified and should be increased to specify provision of 13.95 hectares per annum of employment land (237.2 hectares over the Plan period), comprising 11.5 hectares for general employment and 2.45 hectares per annum for large scale logistics. This provides a more reasonable and justified approach to meeting identified employment needs over the Plan period. We also concluded that the Plan should specify the need for an early Plan review relating to large scale logistics. Further detail and reasoning is set out in our initial post hearings letter.
6. The Council subsequently proposed additional employment allocations to deliver the higher employment requirement in EXAM 124. In reviewing this matter, we have taken into account the evidence and representations before us and consider the proposed increased employment requirement is justified and necessary for soundness. It would enable the city to respond to identified employment needs and support sustainable employment growth. As set out below, we are satisfied that exceptional circumstances have been demonstrated in principle to justify the release of Green Belt land to deliver the proposed level of economic growth. Full reasoning and details will be set out in our final report.
7. Main modifications will be necessary to Policy SP1 to reference the higher total employment requirement figure, the breakdown between different employment uses as set out above, and an early Plan review relating to large scale logistics.

Additional allocations

8. The assessment work shows that there is insufficient capacity on suitable, deliverable/developable and available non-Green Belt sites to deliver the amended housing requirement and meet employment land needs. Document EXAM 124 proposes a number of additional allocations to deliver the higher housing requirement and employment land needs. These sites would be released from the Green Belt, in addition to site SS17 in the submitted Plan (proposed for 270 dwellings). The additional allocations include:
 - NWS30 – land at Forge Lane, Oughtibridge (housing)
 - NWS31 – Storth Lane/School Lane, Wharncliffe Side (housing)
 - NES36 – land south of M1 junction 35 (employment)
 - NES37 – Yew Lane, Grenoside (housing)
 - NES38 – Fox Hill Road, Grenoside (housing)
 - NES39 – Wheel Lane, Grenoside (housing)

- SES29 – Handsworth Hall Farm (housing and employment)
- SES30 – Bramley Lane/Beaver Hill Road, Handsworth (housing)
- SS19 – White Lane, Gleadless Townend (housing)
- SWS18 – Lodge Moor Road, Lodge Moor (housing)
- SWS19 – Parkers Lane, Dore (housing)
- CH03 – Warren Lane, Chapeltown (employment)
- CH04 – Hesley Wood, Chapeltown (employment)
- CH05 – Chapeltown Road, Chapeltown/Ecclesfield (housing)

9. The additional allocations have generated a significant number of concerns and objections from the local community. We have taken account of all submissions relating to the sites, including verbal comments at the hearing sessions and representations received on EXAM 124 and during the recent consultation event. The examination of the Plan has been protracted and complex, with a significant number of technical supporting evidence documents published. However, there have been high levels of local engagement and we are satisfied that the overall consultation process to date has been legally compliant.

10. The NPPF confirms that Green Belt should only be released in exceptional circumstances. The Council has engaged with other authorities about accommodating needs. However, many of these authorities also have Green Belt land and no positive offers have been received to accommodate Sheffield's growth. The delivery of identified housing needs within Sheffield would help to provide homes for people, deliver a wider mix of house types, and facilitate the delivery of additional affordable housing. The release of Green Belt land for employment would allow the Council to meet employment needs. In the absence of reasonable alternatives and given the benefits associated with local housing and economic growth, it is concluded that exceptional circumstances exist in principle to justify the release of land from the Green Belt for these purposes. Further reasoning will be set out in our final report.

11. The Council has undertaken extensive assessment work on the suitability and deliverability of the specific allocation sites proposed to be released from the Green Belt which is proportionate to the development plan process. On the basis of the submitted material we are satisfied the site assessment/selection process and density estimates are reasonable and justified. Further reasoning will be set out in our final report.

12. Taking account of the evidence before us, we are satisfied that the proposed additional allocations are suitable and potentially deliverable/developable at the point envisaged, subject to the changes agreed at the hearing sessions. Delivery will help to meet identified housing/employment needs and the evidence shows it would be feasible

to secure appropriate mitigation measures that would help to limit environmental impacts in association with each allocation. We are also satisfied that exceptional circumstances are demonstrated for the release of each site from the Green Belt for housing/employment uses.

13. Further reasoning and details on each additional allocation will be set out in our final report. However, it should be noted that in relation to sites NES39, NES37 and SES30 the above conclusions are based on further changes to site area/capacity set out in the following paragraphs. Site NES37 is owned by the Council but it is currently occupied and worked by an active tenant farming family. Comments relating to this matter are also set out below.
14. Site NES39 is located to the north of Wheel Lane, Grenoside. Parcels B and C (as shown on the map in EXAM 180) are particularly attractive and consist of open fields sloping down to a river valley, with views from Wheel Lane to the open countryside beyond. We consider that these parcels make a strong contribution to the character and setting of the local area and development here would cause significant landscape/visual harm. Accordingly, weighing up all factors we are not persuaded that development is justified or appropriate on these sections of the site.
15. Parcel A is more contained with nearby built development/woodland on three sides. There is no firm evidence before us that parcel A alone would be undeliverable and we consider there are exceptional circumstances to justify its release from the Green Belt. Site NES39 (comprising parcel A) would therefore have a reduced capacity of 66 dwellings, as identified in EXAM 180. We consider that the southern boundary of the adjoining Local Wildlife Site would form a defensible clear new Green Belt boundary along the northern edge of the allocation. The eastern site boundary would also provide a clear Green Belt boundary. Further reasoning and details will be set out in our final report. A number of conditions in the draft site policy may cease to be relevant and would need to be omitted. New conditions should be included which seek to retain and enhance planting on the eastern and western boundaries and maximise retention of stone walls on the site, for reasons of effectiveness and consistency with national policy.
16. It has been confirmed that a small section of additional allocations NES37 and SES30 are not available for development (as shown in the maps in EXAM 180). As such the allocations would have a slightly reduced site area and be capable of accommodating an estimated 592 and 827 dwellings respectively.
17. Representations before us indicate that the Council's proposed cessation of the current farm tenancy on site NES37 may be subject to legal

challenge and could involve a number of steps. Cessation and/or legal challenge would take time and it is likely that our final report would precede any decision by the Courts. The site is identified in the trajectory in EXAM 140 as coming forward from 2033/34 which allows a significant period for matters to be resolved. Notwithstanding any potential legal challenge, the evidence currently before us does not demonstrate that the site is incapable of development. Furthermore, if it were to emerge that the site is not deliverable for housing, if necessary the Council could consider alternative site options and reappraise Green Belt status through the next Plan review. These matters will be covered in detail in our final report.

18. Sites NES37 and SES30 are also proposed for the potential provision of burial space and new secondary/special needs schools. The Council's evidence shows there is a need for these uses over the plan period. However, departmental work to determine delivery strategies and confirm sites is at an early stage. As such the Plan does not seek to comprehensively plan for these uses. It is also noted that burial provision is not normally an inappropriate use in the Green Belt. The two sites are identified as potential options in EXAM 124 because the land is proposed for release for housing and is in Council ownership. If burial space/schools provision is not ultimately required on these sites, the Council's proposed condition for re-use to be determined through a plan review would enable future options to be fully appraised and debated with the local community.
19. The Council's assessment work to date shows that both sites could potentially be suitable for an element of burial use/schools provision. Some stage 2 technical work is ongoing but overall the evidence indicates there is a reasonable prospect of suitability being confirmed. We are also satisfied that the release of Green Belt land to accommodate these uses is justified in these locations. This is linked to the large amount of land required for housing on these sites, which means that remaining land would make a limited contribution to Green Belt purposes. As such its removal from the Green Belt would be justified on the basis of consequential deletion. Further details will be set out in our final report.
20. The proposed additional allocations listed in paragraph 8 above should therefore be added to Appendix 1 in Part 1 of the Plan and new site-specific policies included in Annex A of the Plan. Consequential amendments to the Green Belt will also be necessary. The policies and map changes should be based on EXAM 124, taking account of changes set out in EXAM 195 and 198 and those referred to above. A number of further changes are listed below and should also be incorporated.
 - SWS19 – reduction in capacity from 82 to 80 dwellings to reflect new information on flood risk (as set out in EXAM 180).

- SES29 – amend site area to exclude small areas of unavailable land, as set out in EXAM 200 (site capacity is not affected).

Other allocations in the submitted Plan

21. Having regard to evidence before us on potential alternative sport improvement schemes in the local area (including in EXAM 123B), we consider that housing allocations ES25 and SS01/SS04 are justified and potentially capable of delivery in line with paragraph 99 in NPPF 2023. This is subject to the main modifications in EXAM 115 and 198. Further changes are also required in relation to site ES25:
 - Main modification to add ES25 to the list of strategic sites in Policy SA4 and Map 9 (missed off in error)
 - Main modification to include a condition which seeks to address risks from the nearby hazardous installation
 - Removal of the Urban Greenspace Zone designation on the Policies Map.
22. The Council’s evidence in EXAM 152B indicates that a significant area of site NES22 is within flood zone 3a in the Environment Agency’s updated flood risk maps. As such site capacity would be less than the minimum 10 dwellings threshold. We therefore concur with the Council that site NES22 should be deleted as a housing allocation for suitability reasons.
23. The Council’s updated evidence on the intensification and reuse of employment land (EXAM 129A) indicates that planning permission was granted in June 2025 for an extension to employment allocation NES03 (as shown in the map in EXAM 193). As such the allocation would have an increased net site area of 2.58 hectares. We are satisfied that this change is justified and a main modification is required to show the increased capacity of NES03, with consequential changes to the Policies Map.
24. A main modification is also required to amend a condition relating to heritage assets on housing allocation NWS17 (as set out in EXAM 199) in order for the Plan to be effective and consistent with national policy.
25. Actions 90 and 92 in EXAM 115 instruct the Council to resolve a number of detailed boundary and policy wording matters for sites ES01 and ES02 through Statements of Common Ground (SoCG) with site promoters. Signed versions of the SoCG were not available when this letter was written and the documents had not been published in the examination library. Nonetheless, in this case we are satisfied these matters are capable of being resolved without undermining the soundness of the plan and can be dealt with after the post hearings letter is published.

26. A number of the allocation sites in the submitted plan contain Local Wildlife Sites (LWS). In such cases we consider it is necessary for site policies to specify that 'no development shall take place within the LWS' and include reference to relevant buffers. The Council is requested to ensure that these conditions are captured for all relevant sites, and to include any necessary amendments (further to the changes in EXAM 115) in the schedule of proposed main modifications. This will help to protect the natural environment and ensure consistency with national policy.

Housing supply

27. The Council's updated trajectory in EXAM 140 indicates that 38,481 dwellings would be delivered over the plan period, including the additional allocation sites. However, taking account of the further changes in the above sections, this figure reduces to some 38,318 dwellings (as confirmed in EXAM 180). We are satisfied that the Council has made reasonable assumptions and used an appropriate approach to estimating supply. Further reasoning will be set out in our final report.

28. A supply of 38,318 dwellings is slightly higher than the amended requirement of 38,012 dwellings over the plan period. As such it appears the plan as amended is capable of delivering a sufficient supply of housing to meet overall housing requirements over the plan period. The headroom is narrow. However, the Plan makes clear provision for more than 10 years of supply, as set out in paragraph 68 in NPPF 2023 (taken from the start of the five year period in 2026/27). Furthermore, taking account of the significant number of allocated sites in the plan and the large-scale of some sites, we consider there could be some flexibility in supply.

29. Based on the evidence in EXAM 181 we are satisfied the Council would be able to demonstrate in excess of five years of housing land supply at the anticipated date of plan adoption in 2026. The document shows that 6.34 years of supply would be secured. This is linked to the stepped requirements discussed above and a 5% buffer. The Council's workings indicate that based on the new plan requirements applied from 2022/23 (and having regard to the Housing Delivery Test Measurement Rulebook), Housing Delivery Test measurements from plan adoption would exceed 80% and therefore a 5% buffer should be applied. The site capacity reductions in EXAM 180 may result in a slightly lower rate than 6.34 years. However, having regard to the trajectory in EXAM 140 it appears this difference will be small and that supply will still exceed five years.

30. Main modifications will be needed to the housing supply tables in Part 1 of the Plan (Tables 1 and 2) to reflect the updated dwelling estimates. Amended supply figures will also need to be reflected in the new trajectory

graph/summary table and five year supply table in the Plan (identified as potential main modifications in EXAM 115). Consequential main modifications may also be needed to supporting text to Policy H1 (page 91) to reflect updated housing supply/requirement figures.

Employment land supply

31. The Council's Updated Employment Land Supply in EXAM 56B indicates that 258.65 hectares of employment land would be delivered over the Plan period, including the additional site allocations (as confirmed in Tables 4 and 5). The updated supply also includes the delivery of an additional 10 hectares of windfall development in the urban area through the intensification and reuse of areas of employment land (EXAM 129A). Having considered the evidence and representations before us, this is both a reasonable and proportionate approach.
32. A supply of 258.65 hectares of employment land is slightly higher than the amended requirement of 237.2 hectares over the plan period. As such the Plan as amended is capable of delivering a sufficient supply of employment land to meet overall employment requirements, with a surplus of 21.45 hectares. The overall supply of additional employment land would aid market choice and flexibility and provide a positively prepared strategy to encourage sustainable economic growth in accordance with paragraph 82 in NPPF 2023.

Other matters

33. Main modifications are needed to Policy GS5 on biodiversity to clarify the status of designated sites within the hierarchy and to confirm that proposals for development will be considered in accordance with the mitigation hierarchy. This will ensure consistency with paragraphs 175 and 180a in NPPF 2023. The approach to protecting Local Wildlife Sites also needs to be clarified for reasons of effectiveness.
34. Main modifications are needed to Policy GS6 on Biodiversity Net Gain (BNG) to ensure consistency with the new legal framework for BNG (which has come into force since the plan was submitted). Policy GS6 should also provide clearer guidance on how legislative and national policy requirements in NPPF para 174d) will be implemented at local level, for effectiveness reasons.
35. Policy AS1 states that required uses should cover at least 80% of the site area. A main modification is needed to change 'site area' to 'gross floorspace' (as set out in CD31). This change is necessary for reasons of effectiveness as built form may cover less than 80% of the site area.