

Statement of objection by S12 Green Belt Action Group Regarding Site 45900 "White Lane Farm"

This is a formal objection to the inclusion of site 45900 "White Lane Farm" as part of any future NEDDC Local Plan. This objection is being submitted by the S12 Green Belt Action Group, a volunteer led action group set up to fight against the inclusion of site SS19 "land to the south of White Lane" as part of the 2025 Additional sites addition to the Draft Sheffield local plan. This objection is based on conflict with the NPPF and local planning policy.

As site 45900 is directly connected to site SS19, shares the same land owner, proposed developer and land promoter, we feel it is important that we submit this objection to prevent the further unsound and unjustified deletion of this area of green belt in the Sheffield 12 (S12) area. Evident over-development of the area, which would essentially connect Sheffield to NE Derbyshire, is the very definition of urban sprawl, and the exact reason that Green Belt regulations were brought into practice in 1955¹.

In this statement, we submit both site specific objections and broader objections relating to the cumulative overdevelopment and lack of infrastructure across the S12 and the South East Sheffield/North East Derbyshire areas. We also raise the procedural failings between SCC, NEDDC and the land promoter that we feel make this site un-developable, unjustifiable, unsound as well as not being in-line with national policy.

Together, SS19 and 45900 create a single cross-boundary expansion that magnifies every constraint identified in the S12 Green Belt Action Group's objections. Green Belt harm becomes strategic, landscape effects spread across the full Moss Valley ridge, and flood-risk and ecological impacts compound along shared corridors. Both sites draw on the same limited school places, GP capacity, road network and wastewater systems, meaning pressures accumulate rather than disperse. In combination, the proposals function as an unplanned urban extension that neither authority has assessed or mitigated

General Site Assessment

As part of the 2026 Issues and Options Consultation, NEDDC has provided a Land Availability Assessment (LLA). Within this, section 2 provides specific site assessment information.

Critically, 45900 is deemed RED for suitability. NEDDCs definition of RED RAG is "The site is unlikely to be developable". For this reason alone the site should be removed from consideration and not included in any future local plan preparation.

¹ Ministry of Housing and Local Government, (1955), *Green Belts*,
<https://londongreenbeltcouncil.org.uk/wp-content/uploads/2016/02/1955-Circular.pdf>

However, it is important to make clear why we support this RED designation, both highlighting elements of NEDDCs own assessment as well as other constraints that it does not cover.

1. Site position & role in Moss Valley

1.1 The site is of significant, irreplaceable, ecological importance and critical to the wider Moss Valley landscape, which includes areas of high countryside heritage character, such as ancient field boundaries, trackways, hedgerows and clean water streams and ponds. The Moss Valley includes many areas designated SSSI status, which are protected by the Wildlife and Countryside Act 1981 (section 28). The Moss Valley is further characterised by unusually rich lowland-farmland mosaic of ancient woodlands, small-scale arable and dairy-farming meadow and pasture grassland, dotted with large timber trees, of which there are few comparators in the whole of England.

1.2 The area is home to many mammals, Red Data Book birds, reptiles, amphibians and insect species which are in rapid decline. The nationally important wealth of wildlife depends on the ecological strength of the Moss Valley, which in turn depends on maintaining the ecological integrity of the Valley as a whole. It was accepted during the Sheffield Green Belt Inquiry in 1982 that the Moss Valley is a nationally important reservoir for many precious and threatened species. The impact of climate change has seen the Moss Valley become an increasingly important stepping-stone and longer term haven for an increased number of southern species, which are wholly dependent on the plant and insect food sources provided by the valley.

1.3 We exhibit to this statement, marked "Exhibit 1", from Emeritus Professor Ian Rotherham, a leading environmental expert and former Ecologist and Head of Ecological Advisory services for Sheffield City Council. The views of Professor Rotherham are unequivocal, and we submit that they should be preferred over any of NEDDCs desk based Heritage Impact Assessment (HIA) concerning the site.

1.4 The Council has failed to identify any mitigation or compensatory measures except from outlining vague "buffers". However, we submit emphatically that any measures adopted would be insufficient. The Moss Valley's ecological richness has been created by centuries of gradual habitat-building and is of the highest green belt value, which cannot be replaced or relocated.

1.5 We submit that any proposed development is entirely inconsistent with the Framework duty to 'protect and enhance biodiversity and geodiversity' and will constitute a failure to 'safeguard components of local wildlife-rich habitats and wider ecological networks' including wildlife corridors and the stepping stones that connect them (para 192(a)). The 'wholly exceptional circumstances' required by paragraph 193 of the Framework to justify development do not exist and the presumption in favour of sustainable development (para 195) is rebutted by the evidence presented in this statement.

As stated above, any notion that BNG can be achieved at the site is, at best, fanciful.

2. The Moss & Robin Brook

2.1 The Moss is a Brook which flows through the Moss Valley and ultimately supplies the River Rother, which in turn has previously supported the three lakes within the Rother Valley Country Park. The Robin Brook runs through the centre of the proposed 45900 site and is one of the main tributaries (alongside Shire Brook) to the Moss. These waterways play a critical role in supporting the ecosystem of the Moss Valley.

2.2 Research conducted by the Environment Agency conducted in 2019 and 2022 showed the alarmingly poor health of The Moss, with its ecological status categorised as 'bad' and chemical status categorised as 'fail'.

2.3 The Group is concerned that the extensive development planned for the site will further diminish the health of the Robin Brook and its connected waterways. We remind the Council of its duties under para 187 of the Framework to enhance the natural and local environment and to avoid adverse effects or unacceptable risk to the Robin Brook, which is unlikely to be ensured by an overly simplistic buffer zone.

3. Buffers

3.1 As part of the Sheffield SS19 consultation, it was initially presented that an 8m buffer should be put in place either side of the brook. After initial consultation feedback from S12 Green Belt action group and Moss Valley Wildlife Group (MVWG), this was increased to 15m either side as confirmed in the latest main modifications documents in March 2026, note that this should be 15m either side from the canopy of the trees.

However, MVWG has carried out further site analysis for both the SS19 site and NEDDC 45900 site to ascertain the woodland on the banks of the brook, this has uncovered clear evidence that there is strong indication that the woodland on the banks of the brook on both sites has attributes of ancient woodland.

This is based upon but not limited to the findings of:

[A] Very good indicators

1. Yellow Archangel
2. Bush Vetch
- (3). Wood Anemone

[B] Good indicators

3. Bluebell
4. Dog's Mercury
5. Field Maple

6. Greater Stitchwort
7. Pendulous Sedge
8. Sessile Oak
9. Wild Arum

[C] Perhaps confirmatory indicators

- (10). Hart's-tongue Fern
11. Herb Robert
12. Lesser Celandine.

Due to these factors, we believe this buffer should be 24m either side from the center of the brook to allow for the appropriate buffering with respect to the canopy of the woodland.

3.2 We estimate that for NEDDC 45900 this will reduce the developable area by roughly 1.3ha which will inevitably impact the viability and deliverability of the site.

3.3 In addition, site analysis indicates clearly that there are Late 18th Century hedgerows bordering the site, which in themselves should be protected and adequate buffers (minimum 5m ideally 8m in places) should be put in place, this itself reduces the developable area on the southern most site by roughly 1-1.2ha further compounding the impact to buildable area viability.

4 Access/Traffic

4.1 The extensive traffic and road safety issues affecting the local road network surrounding the site cannot be unknown to the Council. According to Sheffield City Council's own traffic counts (2020–2024), South-East Sheffield has the highest volume of traffic on minor roads citywide².

4.2 There are significant issues with traffic congestion, which primarily affect High Lane, White Lane (including Fox Lane junction), Bowman Drive, Charnock Dale Road and Carter Hall Road but undoubtedly have knock on effects for roads in neighbouring areas, including Gleadless Townend, Basegreen, Hollinsend and Birley. Development of the site poses a serious risk of exacerbating existing gridlock traffic conditions and causing severe disruption to daily traffic flow, with the addition of an estimated 72018 further vehicles from this site alone.

4.3 Figure 1 below the Local Road Network report for Sheffield Local Plan projects junction capacity in South Sheffield. Whilst the table fails to address the key junctions in immediate proximity to the SS19 site, it does give an indication of junction capacity in the surrounding area, with forecasts operating grossly exceeding operational capacity. For example, the A6102

² Department for Transport, 'Road traffic statistics' (Local authority Sheffield, 2000-2024) <<https://roadtraffic.dft.gov.uk/local-authorities/159> >11 July 2025.

Ridgeway Road / B6388 Gleadless Road junction (the closest to the 45900 site) forecasts evening peak flows of 161%, with implementation of the Plan³.

Figure 1

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

4.4 We anticipate that similar increases in capacity could be expected at the key junctions surrounding the 45900 site, which would impose intolerable pressures on the local road network, already operating at capacity.

4.5 Up to date publicly available traffic data for the S12 areas mentioned above is limited. Manual count figures from 2019 on White Lane (site ref: 940082), which is categorised as a 'Minor B Road', show annual average daily flow of 8,316 vehicles (with an average of 7,349 vehicles over an 11-year period). Notably these figures are taken just before White Lane enters High Lane and therefore do not account for the significant number of vehicles entering White Lane at the Fox Lane junction, or from other feeders' areas such as Gleadless Townend, Birley, Charnock, Frecheville, Basegreen and Charnock³. Notwithstanding, these figures demonstrate that White Lane experiences significantly above average daily flow for urban minor roads, with the average being between 2,100 and 2,600 vehicles per day, based on RAC and Department for Transport statistics^{4 5 6}

³ Department for Transport, 'Road traffic statistics Manual count points Site number: 940082' (Local authority Sheffield, 2000-2024) <<https://roadtraffic.dft.gov.uk/local-authorities/159>> accessed 18 August 2025.

⁴ RAC Foundation, 'Motoring FAQs Q46) How busy are the roads in Great Britain?' (RAC Foundation, 2024) <<https://www.racfoundation.org/motoring-faqs/mobility>> accessed 18 August 2025.

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

⁶ Department for Transport, 'Road traffic estimates in Great Britain, 2024: Traffic in Great Britain by road type' (Department for Transport, 12 June 2025).

4.6 The data for Norton Avenue (site ref: 7818) is more current, showing annual average daily flow of 35,83523. What is plain, is Norton Avenue and White Lane have extremely high daily annual flow, which converges at the Gleadless Townend junction, a short distance from the 45900 site.

5. Road Safety

5.1 Road traffic accident statistics for White Lane show that between 2013 and 2023 there were over 40 accidents between Gleadless Townend and the traffic analysis datapoint near the Phoenix Pub (S12 3XF). Two of those accidents were fatal leading to a 40mph limit being imposed between the Fox Lane junction and the Phoenix Pub, implemented in early 2025. There have been other historic fatal accidents on the same stretch of road, which have been widely publicised in local media. In addition, 10 of the 40 accidents are classified as "serious", with 16 concentrated around the junctions immediately surrounding the SS19 site, namely Lister Avenue, Carter Hall Road & Fox Lane with 15 additional reported incidents between the short distance at the top of the proposed site on Birley Lane and the Junction of Fox Lane and White lane, 3 of which are severe ⁷.

5.2 The wisdom of attempting to construct access to the site anywhere on White Lane or High Lane has to be questioned, in the context of such serious road safety concerns.

5.3 We submit that existing road infrastructure cannot absorb the additional traffic which will be generated by the site, without seriously compromising safety and liveability. We consider that the Plan demonstrates a failure to understand and address potential impacts on the transport network as required by para 109(c) of the Framework⁸. Development of the site will significantly exacerbate existing problems in the local road transport network in terms of capacity, congestion and highway safety in the manner prescribed in para 115(c) of the Framework⁹. There has been no consideration of how these impacts can be successfully mitigated. Notwithstanding, we submit that the issues present an unacceptably severe impact on highway safety and the local road network, such that they must be refused in accordance with paragraph 116 of the Framework.

6. Access

6.1 There are no viable access points to the site and any attempts to facilitate access would be inconsistent with the requirements of the Framework (most notably paragraphs 115-117).

⁷ Think!, 'Think! Map' (Think! Map, 2025) <<https://www.think.gov.uk/thinkmap/>> accessed 27th April 2026.

⁸ NPPF, PARA 109(c)

⁹ Ibid, para 115(d)

6.2 The issues of traffic, congestion and road safety in relation to the local road network are detailed in section 4. We submit that these issues alone are compelling and preclude any reasonable prospect of access to the site via White Lane. These issues are, however, compounded by the lack of any viable access to the SS19 site.

6.3 NEDDCs own analysis backs up the access issues and states that due to site topology in site road network will be an issue. This includes the North East Derbyshire Housing Land Availability Assessment 2026 ([Housing Land Availability Assessment 2026](#)) which identifies Fox Lane as a potential access point but acknowledges that this is problematic due to the close proximity of existing traffic-light controls and extensive on-street parking, both of which are likely to cause congestion and obstruct access to the site.

6.4 The group agrees with NEDDCs analysis that Carter Hall Lane should NOT be considered for any form of access.

Infrastructure impact

7. Healthcare provision

7.1 We submit that development of the site, which is likely to bring an influx of 2,000+ residents 304 (SS19), 348 (NEDDC) x 3 bedrooms approx. 2.5 residents per household is 2,282 people. into the S12 area, will apply unsustainable pressures to existing healthcare services (which are already critically overstretched), resulting in reduced access for existing and new residents alike, whilst widening existing health inequalities.

7.2. We consider this is inconsistent with the Framework which contains duties to promote good health, prevent ill-health and reduce health inequalities in deprived communities (para 96(c)) and the wider duty imposed by the Public Sector Equality Duty¹⁰.

GP services

7.3 The SS19 site development is expected to introduce at least 1,000 residents to the S12 community. This will generate demand for approximately 6,000 GP appointments annually¹¹. The planned developments in S12 put forth by the Plan (SS19- 304 homes, Jaunty Avenue- 75

¹⁰ Equality Act 2010, s 149

¹¹ Stuart Hoddinott, 'General practice across England: The number and type of appointments are related to patient satisfaction' (Institute for Government, 21 April 2025).
<https://www.instituteforgovernment.org.uk/publication/performance-tracker-local/general-practice-england/appointments-satisfaction> > accessed 12 August 2025

homes), along with the ongoing SwaN development¹² of over 300 homes are set to introduce around 2,500 new residents who would require a further 15,000 GP appointments annually.

7.4. The above estimates do not consider that two of S12's most deprived Lower Layer Super Output Areas (LSOAs) are proximate to the SS19 site, nor that South East Sheffield has poorer health outcomes, compared with other areas of the city; for example, the more affluent Sheffield Hallam constituency. Figure 2 below demonstrates the increased prevalence of various conditions in S12, as compared to Sheffield Hallam¹³.

Figure 2

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

6.11 A full-time GP typically delivers around 4,500 appointments annually¹⁴. Analysis by The Health Foundation has shown that GP practices in deprived areas face increased patient workloads of 15%¹⁵. Increased demand from the SS19 site alone would require an increase in GP workloads in the region of 42% (i.e., an increase from 4,500 to 6,400 appointments per GP), with demand for the wider S12 community likewise increasing exponentially. These realities appear to have been entirely overlooked by infrastructure modelling for the SS19 site, with the

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

¹³ UK Parliament, 'Constituency data: health conditions' (House of Commons Library, 4 July 2024), <<https://commonslibrary.parliament.uk/constituency-data-how-healthy-is-your-area/>> accessed 17 August

¹⁴ [Stuart Hoddinott](#), 'General practice across England: The number and type of appointments are related to patient satisfaction' (Institute for Government, 21 April 2025). <<https://www.instituteforgovernment.org.uk/publication/performance-tracker-local/general-practice-england/appointments-satisfaction>> accessed 12 August 2025

¹⁵ The Health Foundation, 'Mounting cycle of pressures on GPs in deprived areas' (The Health Foundation, 2019) <https://www.health.org.uk/press-office/press-releases/mounting-cycle-of-pressures-on-gps-in-deprived-areas> accessed 17 August.

only mitigation proposed being to 'reconfigure or create capacity for one additional consultation room' within an existing surgery in Townships 2 Primary Care Network (PCN)^{16 17}.

6.12 We are concerned that these oversights risk deepening health inequalities, (including for those with protected characteristics under the Equality Act 2010) and fall short of the duties imposed by the Health and Social Care Act 2012, which requires the reduction of health inequalities and the improvement of public health;¹⁸ as well as the Framework duties to prevent ill-health and reduce health inequalities between the most and least deprived communities (para 96(c)); and to ensure faster delivery of public service infrastructure¹⁹. These duties cannot be performed if primary care infrastructure is overwhelmed by increased demand imposed by the Plan.

8. Dental care

8.1 This Group has contacted 4 local dental surgeries:

- Hurlfield Dental Practice, S12 2SD
- Hackenthorpe Dental Health Centre, S12 4LB
- My Dentist, S12 4WH
- DL Dental, S12 2AQ 6.27.

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

9. Public Transport

9.1 The scale of growth envisaged at the site and S12 generally will place substantial pressure on an already limited and overstretched public transport network.

9.2 S12 is served by bus routes (principally the 120, 51, 252, 8, and 41/42), and Blue Route tram (which is full at White Lane towards the city centre in peak hours) and a minimal Purple Route service (hourly). Existing services experience significant peak-time congestion, especially

¹⁶ Sheffield City Council. 'Infrastructure Delivery Plan Part 2: Infrastructure Schedule Addendum' (Sheffield City Council, May 2025) <https://017f5bf8-ff4d-415b-be58-79dae2836c33.usrfiles.com/ugd/017f5b_a48ec4aca84e4953a1ecd7f75619d79d.pdf> accessed 15 August 2025, p27

¹⁷ Public Health England, 'Health Impact Assessment in spatial planning' (Gov.UK, October 2020) <https://www.gov.uk/government/publications/health-impact-assessment-in-spatial-planning> accessed 15 August 2025

¹⁸ Health and Social Care Act 2012, s 4, 12

¹⁹ Ibid, para 101

along Ridgeway Road, White Lane, and City Road, City Road, Norton Avenue leading to Ridgeway Road are recognised pinch points in the Council's own transport assessments²⁰.

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

9.4 We note that Chartered Institution of Highways & Transportation (CIHT)^{21 22} and Department for Transport²³ suggests that public transport stops should be located within 400m of new residential areas and run every 12 mins or better please see Figure 13. to ensure convenience and reduce emissions. Furthermore, CIHT and Department of Transport suggest that the regularity of services is important with 'frequency minimum every 20 minutes in urban areas, with 10 minutes the target, and 5–6 minutes the target for core routes and corridors'²⁴. Whilst developed for urban settings the guidance is designed to be applied to suburban areas such as SS19 and 45900. At present none of the bus/tram services which service SS19 or 45900 hit this target of 10 mins and 400m.

Figure 3

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

²⁰ *Transport Assessment: Report on Local Road Network Impacts and Potential Mitigation* (Sheffield Local Plan, May 2025) <https://haveyoursay.sheffield.gov.uk/sheffield-plan-proposed-additional-site-allocations?tool=survey_> accessed 12 August 2025

²¹ Chartered Institution of Highways & Transportation, '*Buses in Urban Developments*' (Chartered Institution of Highways & Transportation, January 2018) https://www.ciht.org.uk/media/4459/buses_ua_tp_full_version_v5.pdf accessed 20 August 2025

²² Chartered Institution of Highways & Transportation, '*Planning for Walking*' (Chartered Institution of Highways & Transportation, April 2015) https://www.ciht.org.uk/media/4465/planning_for_walking_-_long_-_april_2015.pdf

²³ Department for Transport, '*Manual For Streets*' (Department for Transport, 2007) <https://assets.publishing.service.gov.uk/media/5a7e0035ed915d74e6223743/pdfmanforstreets.pdf> accessed 20 August 2025.

²⁴ Chartered Institution of Highways & Transportation, '*Buses in Urban Developments*' (Chartered Institution of Highways & Transportation, January 2018) https://www.ciht.org.uk/media/4459/buses_ua_tp_full_version_v5.pdf accessed 20 August 2025.

10. Water Supply

10.1. Since October 2024, there have been seven documented water supply failures in the S12 3 area. Below is a documented pattern of water infrastructure failures in the S12 area, including repeated incidents of low pressure and supply interruption caused by burst mains and pump failures. This demonstrates existing strain on the water network, raising concerns that additional development could worsen reliability. These are evidenced by SMS alerts sent to residents of the Charnock area on the following dates:

- 21 November 2024
- 16 December 2024
- 12 March 2025
- 28 April 2025
- 29 April 2025
- 30 April 2025
- 3 July 2025

10.2. The issues range from a complete loss of supply to low pressure and pump malfunctions. Seven Trent have not been engaged throughout the process however, much of Charnock and S12 is supplied by Seven Trent and suffers supply issues and therefore we feel should be engaged to mitigate possible issues²⁵. The existing infrastructure has demonstrated an inability to adequately service existing homes in accordance with the duty imposed by section 37 of the Water Industry Act 1991. Any increase in demand is likely to further reduce the resilience and reliability of the water supply to the Charnock area.

10.3 Access to a clean and safe water supply is a basic right. The Framework imposes a duty to make sufficient provision for water supply (para 20(c)). The Sheffield Draft Local Plan Policy (Infrastructure Delivery) similarly stipulates that new developments must only proceed where essential utilities are available. The Plan, however, fails to acknowledge and mitigate existing supply issues, which are likely to be intensified by the addition of 300+ homes.

10.4. Severn Trent have declined the opportunity to comment substantively on the Plans in response to questions posed by the Group.

²⁵ Sheffield City Council. 'Infrastructure Delivery Plan Part 2: Infrastructure Schedule Addendum' (Sheffield City Council, May 2025) <https://017f5bf8-ff4d-415b-be58-79dae2836c33.usrfiles.com/ugd/017f5b_a48ec4aca84e4953a1ecd7f75619d79d.pdf> accessed 15 August 2025

11. Wastewater and sewerage

11.1. The sewerage system in S12 is already under unsustainable pressure, demonstrated by frequent storm overflow discharges for the past 12 months²⁶. These include:

- Seagrave Crescent: 29 spills totalling 54.75 hours into Shire Brook in 2024 and 27 times for a total of 52.75 hours, in 2025.
- Bridge Inn Ford: 37 times for a total of 81.50 hours in 2025 and 27 times for a total of 87 hours in 2025, discharging into The Moss
- Birley Vale Combined Sewer Overflow: 36 spills totalling 120.5 hours into Shire Brook in 2024 and 20 times for a total of 55.00 in 2025.
- Alport Road: 71 spills totalling 123.5 hours into a tributary of Shire Brook (cause cited as insufficient hydraulic capacity)
- Normanton Springs: 39 spills totalling 46.5 hours into Shire Brook — despite the monitor being operational only 86.94% of the year

11.2 Other areas within S12 are notably less affected than S12 3, which is suggestive of chronic underlying issues in the existing network. We are concerned that the inevitable increase in wastewater (as well as surface water) generated by 300+ new homes will overwhelm the network's safe operating limits, and the Plan includes no proposals for deliverable upgrades to the system. Yorkshire Water's assessment suggests the system will struggle to cope 'Records show evidence of some capacity constraints in network close to site'²⁷.

11.3 The Framework imposes a duty to make sufficient provision for wastewater infrastructure (para 20(b)).

The nearest sewers are overflowing regularly it is unreasonable to believe that Yorkshire Water's system can cope with another proposed 922 homes in the area surrounding Charnock (45900, SS19, and SS17) without severely impacting the delicate ecosystem and wildlife.

12. Flood risk

12.1 The North East Derbyshire Housing Land Availability Assessment (2026) confirms that Site 45900 contains land within Fluvial Flood Zone 3 and Flood Zone 2, alongside multiple surface-water flood-risk layers and steep topography. Under NPPF paragraphs 170–182 ([National Planning Policy Framework](#)) development must be directed away from areas at highest flood risk, and the Sequential Test must be applied at plan-making stage to steer allocations to safer land wherever possible. Paragraph 174 is explicit that development should

²⁶ The Rivers Trust. Sewage Map: The Rivers Trust (April 2026) [Sewage Map | The Rivers Trust](#) accessed 25 April 2026.

²⁷ Sheffield City Council. 'Infrastructure Delivery Plan Part 2: Infrastructure Schedule Addendum' (Sheffield City Council, May 2025) <https://017f5bf8-ff4d-415b-be58-79dae2836c33.usfiles.com/ugd/017f5b_a48ec4aca84e4953a1ecd7f75619d79d.pdf> accessed 15 August 2025

not be allocated if reasonably available sites exist in areas of lower flood risk, which is clearly the case in North East Derbyshire.

12.2 The presence of Robin Brook along the southern boundary further constrains the developable area and introduces ecological and drainage sensitivities that require buffers and mitigation. Given the combination of Zone 3 land, surface-water pathways, steep gradients, and the site's location within a high-sensitivity landscape and Conservation Area, the site cannot realistically demonstrate that development would be safe for its lifetime without increasing flood risk elsewhere, as required by NPPF paragraphs 178–181. On this basis, Site 45900 fails the Sequential Test and is unsuitable for allocation.

13. Green belt exceptions

13.1 Site 45900 does not meet the national policy exceptions for Green Belt release. The LAA confirms that the site is 99.8% Green Belt and lies almost entirely within the Moss Valley Conservation Area, with 98.43% Primary AMES sensitivity, meaning it strongly fulfils Green Belt purposes by safeguarding the countryside from encroachment and preserving the setting, character, and openness of the valley landscape.

13.2 Under the NPPF, Green Belt boundaries may only be altered in exceptional circumstances, demonstrated through a fully evidenced plan-making process & not through site-by-site pressure or housing numbers alone. No such exceptional circumstances exist here: the district has numerous lower-harm alternatives, the site's landscape harm is assessed as Major, and development would represent a clear incursion into open countryside, directly conflicting with Green Belt purposes.

14. Cross Boundary Impact

14.1 Site 45900 lies immediately adjacent to Sheffield's SS19 allocation, meaning that development here would form a single, continuous block of urban expansion across the district boundary. The two sites share the same landowner, promoter, and developer, yet there has been no transparent, cross-boundary assessment of their combined effects.

14.2 Together, they would erode the Green Belt separation between Sheffield and North East Derbyshire, undermine the Moss Valley Conservation Area, and intensify pressure on shared infrastructure including school places, GP capacity, and the wastewater network already identified as constrained.

14.3 The North East Derbyshire LAA 2026 itself records major landscape harm, high environmental sensitivity, and Red suitability, confirming that the site is unsuitable even in isolation. When considered cumulatively with SS19, the omission of a joint assessment breaches the recognised "golden rules" of plan-making, whereby there should be no surprises,

no duplication, and no gaps, leaving both authorities without a defensible evidence base for Green Belt release or infrastructure mitigation.

15. Density and uplift

15.1 The LAA ([Housing Land Availability Assessment 2026](#)) assessment gives site 45900 space for around 290 homes, then adds a 20 percent uplift, pushing this up to 348, because it sits near Sheffield. However, the site is rural Green Belt agricultural land, not part of the city. It has narrow lanes, B roads, limited public transport, and lies within a Conservation Area. The site also faces flood-risk, steep ground, and a watercourse requiring significant buffers and major landscape harm, all of which reduce the land that could actually be built on. The number of houses proposed is unrealistic and inflates capacity beyond what the site can safely or sustainably deliver.

16. SCC/NEDDC/Land Promoter

16.1 Fisher German, is acting as promoter for sites 45900 and SS19. While the statutory Duty to Cooperate rests with the local authorities, it is reasonable to expect land promoters to act transparently and support coordinated evidence where proposals cross boundaries. Fisher German's promotion of linked sites in Sheffield and North East Derbyshire without any joint assessment falls short of that expectation and undermines the integrity of the plan-making process.

16.2 Fisher German Duty to cooperate.

Below are FOI requests results regarding land promoter evidence that there has been no correspondence between NEDDC and SCC until April 2026. This evidence is a result of EIR Ref: N-E/53/2526:

3. Impact on Sheffield Local Plan site SS19

Please provide any documents, internal analysis, or correspondence held by NEDDC assessing whether the proposed allocation of site 45900 had any implications for:

- the justification,*
- need, or*
- deliverability*

of Sheffield Local Plan allocation SS19 – Land south of White Lane.

NEDDC RESPONSE - No information held.

4. Correspondence regarding cross-boundary development

Please provide copies of any emails, letters, meeting notes, or briefing documents exchanged between North East Derbyshire District Council and Sheffield City Council since 1 January 2025 that relate to:

- potential housing allocations near the Sheffield boundary, including Ridgeway / White Lane, or*

- any sites that could have cross-boundary planning implications for Sheffield, including site 45900.

NEDDC RESPONSE - No discussions have taken place with Sheffield City Council (SCC) in relation to Site 45900, due to the relatively early stage in the process. However, it will be discussed at future meetings between the two councils under the Duty to cooperate.

The only Local Plan and site related correspondence between the Councils since January 2025 took place in April 2025 and related to SCC's Local Plan as part of the Duty to Cooperate.

A further EIR to SCC provided meeting notes between SCC and NEDDC from 17th March 2026, relating to cross boundary issues the following is notes

"It was also agreed that further meetings would be necessary to discuss the detailed cross boundary issues and approach to any site that is likely to be included within NEDDC's Regulation 19 Plan. In the meantime, NEDDC will review SCC's Main Modifications in respect of the site at White Lane."

The fact that the last 2 meetings between SCC and NEDDC took place almost a year apart and that there were 2 key consultations as part of the sheffield local plan both before and after site 45900 was promoted to NEDDC as part of issues of options could be viewed as a critical failure of Duty to cooperate, the failure to have a documented meeting with SCC at the point of the site being submitted, when a site has been clearly stated and understood that this was an adjoining site to an already submitted site to Sheffield could be viewed to completely undermine the inspectorate process as there were critical Plan hearings in October 2025. It cannot be denied that SCC at a minimum should have been made aware of the site promotion by the land promoter and NEDDC and this should have been brought to the attention of the inspectorate.

It should be noted we have pending FOIs with SCC where we are seeking to establish the earliest date SCC were aware of the land promotion as to ascertain if there was any withholding of information at the time of inspectorate hearings that undoubtedly would have changed the landscape and discussion topics, even if development was speculative with regards to NEDDC 45900.

16.3 At the 15 October hearing, Sheffield confirmed a wider (15m from banks either side) Robin Brook buffer than that shown in the promoter's masterplan (8m from banks either side), and further differences emerged regarding the promoter's viability assumptions, land value expectations, and reliance on outdated evidence.

16.4 In parallel, North East Derbyshire District Council has confirmed in its Issues & Options consultation that the previous Green Belt Review cannot be relied upon under the updated NPPF and revised methodology, and that the new Review is still awaited. Despite this, Fisher

German continues to promote the site for Green Belt release without the necessary, up-to-date evidence base.

17. School places and post- 16 education

17.1 Charnock Hall Primary Academy, the school closest to both sites, offers only 60 reception places for 2026/27 but received 119 applications. Although the breakdown of first-preference choices is not yet available, the overall demand demonstrates that the school is heavily oversubscribed and competition for places is high. Oversubscription for academic year 2025/26 was 33%²⁸. These figures reflect sustained pressure on primary provision within the S12 catchment, leaving no realistic scope to absorb additional pupil yield from new housing at SS19 or 45900.

17.2 Two other local primary schools are over capacity according to government data.

Figure 4

School	Capacity	Current number of pupils
Gleadless Primary	420	438 ²⁹
Woodlands Primary	420	473 ³⁰

17.3 Across both secondary schools in S12 there are only 58 places available, which is not enough to support the influx of pupil numbers expected across S12, with 1500 homes as part of Sheffield's local plan and 400 included in S12 for NEDDC local plan.

Figure 5

²⁸ [Sheffield.Gov.uk](https://www.sheffield.gov.uk/sites/default/files/2025-04/oversubscribed_infant_and_primary_schools_2025.pdf). *ENTRANCE INTO RECEPTION 2025/2026: OVERSUBSCRIBED* (April 2025). SCHOOLS https://www.sheffield.gov.uk/sites/default/files/2025-04/oversubscribed_infant_and_primary_schools_2025.pdf [accessed 27th April 2026].

²⁹ [Gov.UK](https://get-information-schools.service.gov.uk/Establishments/Establishment/Details/150172?searchQueryString=SelectedTab%3DEstablishments%26SearchType%3DLocation%26SearchType%3DLocation%26LocationSearchModel.Text%3DS12%26LocationSearchModel.AutoSuggestValue%3D53.339225769043%252c-1.40551197528839%26b%3D1%26b%3D4), *Gleadless Primary Academy* (2026). <https://get-information-schools.service.gov.uk/Establishments/Establishment/Details/150172?searchQueryString=SelectedTab%3DEstablishments%26SearchType%3DLocation%26SearchType%3DLocation%26LocationSearchModel.Text%3DS12%26LocationSearchModel.AutoSuggestValue%3D53.339225769043%252c-1.40551197528839%26b%3D1%26b%3D4> [accessed 27th April 2026].

³⁰ [Gov.uk](https://get-information-schools.service.gov.uk/Establishments/Establishment/Details/141339?searchQueryString=SelectedTab%3DEstablishments%26SearchType%3DLocation%26SearchType%3DLocation%26LocationSearchModel.Text%3Ds123he%26LocationSearchModel.AutoSuggestValue%3D53.3415832519531%252c-1.42129552364349%26b%3D1%26b%3D4), *Woodlands Primary School* (April 2026). <https://get-information-schools.service.gov.uk/Establishments/Establishment/Details/141339?searchQueryString=SelectedTab%3DEstablishments%26SearchType%3DLocation%26SearchType%3DLocation%26LocationSearchModel.Text%3Ds123he%26LocationSearchModel.AutoSuggestValue%3D53.3415832519531%252c-1.42129552364349%26b%3D1%26b%3D4> [accessed 27th April 2026].

School	Capacity	Current number of pupils
The Birley Academy	1163	1108 ³¹
Sheffield Springs Academy	1050	1047 ³²

17.4 A further key concern with the scale of proposed housing development in South Sheffield is the lack of adequate post-16 education provision. The National Planning Policy Framework makes clear that development should be supported by sufficient infrastructure, including education, to meet the needs of growing communities. However, there is no post-16 education provision in S12 or the wider South-East Sheffield area, meaning students must travel long distances for sixth-form or college. S12 has some of the lowest higher-education participation rates locally, likely linked to these access barriers. The addition of large numbers of new homes will inevitably increase the population of 16-18 year olds, placing further strain on an already stretched system. Without clear investment in new or expanded post-16 facilities, this risks reduced access to education, increased travel times, and greater inequality, directly conflicting with the NPPF's objective of supporting strong, inclusive communities.

Closing Statement

For the reasons set out above, S12 Green Belt Action Group strongly supports NEDDC's own RED suitability conclusion and submits that site 45900 should be removed from further consideration. The site is not a marginal or unconstrained housing option: it is sensitive Green Belt land within the Moss Valley landscape, affected by steep topology, Robin Brook, ecological corridors, hedgerows, flood risk, landscape harm, access difficulties and unresolved infrastructure constraints. Once proper buffers are applied and the developable area is realistically reduced, the assumed housing capacity becomes unsound and undeliverable. Any allocation would also rely, directly or indirectly, on the adjoining Sheffield SS19 proposal, creating a single cross-boundary urban extension and compounding existing traffic, road safety, pollution, school, health, public transport, water and wastewater pressures across S12 and North East Derbyshire. The absence of a transparent joint assessment between NEDDC, SCC

³¹ . [Gov.uk, The Birley Academy](https://get-information-schools.service.gov.uk/Establishments/Establishment/Details/143963?searchQueryString=SelectedTab%3DEstablishments%26SearchType%3DLocation%26SearchType%3DLocation%26LocationSearchModel.Text%3Ds123he%26LocationSearchModel.AutoSuggestValue%3D53.3415832519531%252c-1.42129552364349%26b%3D1%26b%3D4), (April 2026). <https://get-information-schools.service.gov.uk/Establishments/Establishment/Details/143963?searchQueryString=SelectedTab%3DEstablishments%26SearchType%3DLocation%26SearchType%3DLocation%26LocationSearchModel.Text%3Ds123he%26LocationSearchModel.AutoSuggestValue%3D53.3415832519531%252c-1.42129552364349%26b%3D1%26b%3D4> [accessed 27th April 2026].

³² [Gov.uk, Sheffield Springs Academy](https://get-information-schools.service.gov.uk/Establishments/Establishment/Details/131896?searchQueryString=SelectedTab%3DEstablishments%26SearchType%3DLocation%26SearchType%3DLocation%26LocationSearchModel.Text%3Ds123he%26LocationSearchModel.AutoSuggestValue%3D53.3415832519531%252c-1.42129552364349%26b%3D1%26b%3D4) (April 2026). <https://get-information-schools.service.gov.uk/Establishments/Establishment/Details/131896?searchQueryString=SelectedTab%3DEstablishments%26SearchType%3DLocation%26SearchType%3DLocation%26LocationSearchModel.Text%3Ds123he%26LocationSearchModel.AutoSuggestValue%3D53.3415832519531%252c-1.42129552364349%26b%3D1%26b%3D4> [accessed 27th April 2026].

and the land promoter represents a serious Duty to Cooperate failure and leaves a clear evidential gap. We therefore object to the inclusion of site 45900 in any future NEDDC Local Plan and request that the site be rejected. The S12 Green Belt Action Group's SS19 statements are appended and should be read as part of this objection, given the direct relationship between the two sites and the cumulative impacts that would arise.

EXHIBIT 1 – Professor Ian Rotherham

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

Ian Rotherham – experience and cv.

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

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

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

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

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

Context

I have known the area in some detail since the 1970s and was instrumental in the Green Belt Public Inquiry in the 1980s and which clearly established the Moss Valley as a regionally significant landscape on high and irreplaceable ecological importance and county-level landscape value as a countryside area. The results of the inquiry included the establishment of the Moss Valley (later 3-Valleys) Countryside Management Project. The site in question is an important part of this wider landscape and includes areas of high countryside heritage character including ancient field boundaries, trackways, and associated hedgerows. This aspect of the landscape character, archaeology, and heritage is not addressed in the City Council's evaluation of archaeology by SYAAS.

Comments on the ecological significance of the area

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

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

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

Protected species include breeding barn owl nearby and hunting over the site, [REDACTED] numerous bat species, and much more. The area has bird species that are now declining like skylark, yellowhammer, linnet, tree sparrow, house sparrow, etc. and others. Lapwing has also been recorded. The countryside here is habitat for tawny owls, kestrel, sparrowhawk, common buzzard, grey heron, and for typical farmland birds like chaffinch, greenfinch, bullfinch, willow warbler, whitethroat and blackcap. I have also

recorded the now increasingly rare cuckoo in this area. In terms of mammals, along with [REDACTED] there are fox, brown hare, rabbit, hedgehog, wood mouse, field vole, brown rat, muntjac deer, and roe deer. Grass snake, smooth newt, common frog, common toad, and the rare, palmate newt are all recorded from the vicinity. The area is rich in invertebrates such as butterflies, moths, hoverflies, bees and bumblebees, and many of which are groups under serious pressure of long-term declines.

Specific queries and issues:

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

1) 'Planning applications must include a comprehensive assessment of the development's impacts on the environment. Where appropriate, adverse impacts should be offset through compensatory improvements to the environmental quality and accessibility of remaining areas of Green Belt.' It is totally unclear how this might be achieved to provide any local or nearby viable compensation. Amongst other problems, the City Council does not own or control any land in the adjacent Green Belt zone, which is working farmland. Achievability needs to be clarified and transparent. Furthermore, ancient species-rich hedgerows are non-tradeable, and their loss cannot be mitigated.

2) This site is identified as impacting on Heritage Assets and due consideration should be given to the impact of any proposal prior to the submission of any planning application. Development proposals should implement the recommendations set out in the Heritage Impact Assessment prepared in support of the Local Plan, or other suitable mitigation measures agreed with the Local Planning Authority, to avoid or minimise harm to the significance of heritage assets and their settings. As noted above, this has not been addressed in the SYAAS report which simply highlights the built structures such as Carter Hall. The important landscape context is not taken into account.

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

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

Professor Ian D. Rotherham, August 2025

Appendices A - Moss Valley Wildlife Group Supporting Statement

[A] The MVWG fully supports and agrees with all the points made, evidence provided, and reasoning and references set out, in S12 Green Belt Group's objection to Site 45900, with regard to:

1. The exceptional and irreplaceable ecological and landscape importance of the Moss Valley as a cross-border whole.

2. The disproportionately and indefensibly high price in ecological and landscape damage that inclusion of Site 45900 would wreak.

3. The gross inadequacies of NEDDC's knowledge and assumptions about Site 45900 in relation to SCC's wholly unsustainable and undeliverable Site SS19, which would render the above-stated damage tragically pointless.

[B] The MVWG can provide the following additional points and evidence from our latest researches:

1. The (1985+) Moss Valley Countryside Management Project

a) The attached "Schedule of Projects" map clearly states, in the top right corner, that it shows the "Schedule of Projects" for the "Moss Valley Countryside Management Project".

b) The map as a whole also clearly shows that the Project covered the whole of the Moss Valley, across the two LEAs and both counties, clearly demonstrating the whole-Valley scope of the Project.

c) The Project included the whole of both Site SS19 and Site 45900, right up to Birley Lane, as shown in the top-central area of the map.

2. The regional and national ecological and landscape significance of the whole Valley

This is clearly demonstrated by the information provided by ***an article in the local Mosborough "Leader" newspaper of 21st February 1985***, written by Janet Lane, reporting on a public meeting to launch the Project's work in that year:

"Work will be tackled through schemes run by the Manpower Services Commission...

"Half the cost of the project will be met by Derbyshire County Council, North East Derbyshire District Council, South Yorkshire County Council and Sheffield City Council.

"The rest will come from the Countryside Commission and the Nature Conservancy Council".

In other words, this is serious money and involvement from all levels of government: not just a jointly-funded LEA/county-level scheme, but one that was 50% funded by the two top relevant national bodies of the time, and with the employment contracts in the hands of the UK Government's top job-creation office of the time.

3. Late-18th-century hedgerows

See the attached 1796 and modern maps. Crosses indicate hedgerows not on both maps. The dotted line shows the present-day footpath. The grid lines show the 100-metre map-reference squares.

The Enclosure Award map, dated 1796, shows the following hedgerows in the 45900 area, and these are also marked on the attached modern map of the same area:

a) From the footpath tip of White's Wood:

- the hedgerow that runs NE. to just W. of the N. tip of the wood
- the hedgerow that curves W. to Carterhall Lane.

b) From Sunnybank:

- the hedgerow that runs SSW. from the W. Side of Sunny Bank.
- the first hedgerow W. from Sunny Bank, that runs from White Lane to Robin Brook. The well-wooded lower third of this hedgerow still currently includes at least one Ancient Woodland Indicator plant, Dog's Mercury, in profusion.
- the hedgerow S. of Sunny Bank. that runs between these two.

c) *From Eckington Leys:*

– all the hedges that mark the field between EL and the hedge that the tram cuts through. The NE. hedgerow is the obviously very ancient N. boundary of Eckington Parish.

d) *Obviously both hedgerows along the ancient White Lane, as well as those along the ancient Carterhall Lane.*

4. Impact Risk Zones

The following warnings included in SSC's PEA for Site SS19 may well apply to NEDDC's Site 45900 as well:

a) 3.2 *The Site falls within the SSSI Impact Risk Zone (IRZ) for Moss Valley Meadows SSSI.*

The Site lies within an area that indicates that impacts to the SSSI could be present for residential

*developments of 100 units or more, or rural residential developments of 50 or more units outside existing settlements/urban areas. As the proposals are anticipated to have in excess of 200 units, **there is potential for the development to impact Moss Valley SSSI.***

b) 3.3 & 3.4: *"A total of 15 non-statutory designated sites were identified within 2 km of the Site*

boundary, all of which were Local Wildlife Sites (LWS). Stoneley and Charnock Woods LWS is the closest non-statutory designated site to the Site, located approximately 300m. south

*of the Site.... Due to the proximity of Stoneley and Charnock Woods LWS, **there is potential for***

this designated site to be impacted from increased footfall in the designated site from the development".

Links of maps of the area can be found in the folder [here](#)

Appendices B – Links to S12 Green Belt Action Group Documentation

This [LINK](#) takes you to a folder which includes previous S12 Green Belt Action Group Documentation

- S12 Green Belt Action Group - Initial Objection August 2025
- S12 Green Belt Action Group - Second objection in response to hearings December 2025
- Maps of the Area