

From: Sadie Charlton [REDACTED]
Sent: 10 July 2025 17:30
To: SheffieldPlan
Cc: [REDACTED]
Subject: Objection to Local Plan: SES30 & SES29
Attachments: SES30 SES29 Objection.docx

For the attention of the planning inspectors,

Please find attached my objection to sites SES30 and SES29

1. Personal Details

Name: Sadie Charlton

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Please confirm you have understood this documents relating to use of your personal data.

Yes ☒ No ☐

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? – YES

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. Please avoid sharing personal information. :

I have been actively involved with the residents campaign group “Save S13 Green Belt: The Sapphire McCarthy Campaign”, I have supported residents throughout this process and they trust that I will advocate on behalf on the community. I am also awaiting outstanding FOI requests which may be useful to add for further evidence in the autumn. If the inspector is unable to allocate a space to me, I’m happy for any member of the residents working group to represent on my behalf.

SAVE S13 GREEN BELT

*The Sapphire McCarthy
campaign*



My name is Sadie Charlton, a single parent and NHS Occupational Therapist. I've lived in S13 for 13 years, ever since moving to Sheffield. Just recently, I was finally able to buy my first home here — something I'm incredibly proud of as a single mum. While I'd love to live closer to the Peak District with better schools, healthcare, and green space, the west of the city is unaffordable for people like me. That's why I've built a life in Handsworth — a place I value deeply and want to see thrive.

One of the things I've cherished most is daily access to the SES30 green space, which has been vital to my health, wellbeing, and routine. I'm now doing all I can to protect it — not just for myself and my son, but for the wider community.

Over the past nearly three months, I've been actively involved in the "Save S13 Green Belt – The Sapphire McCarthy Campaign" residents' working group. I've spent countless hours supporting local residents, running community drop-in events, creating accessible information, flyers, banners and leaflets and helping others who are digitally excluded and/or marginalised understand the Local Plan process and how to engage. This is work the Council should have done. My time — and that of so many others — could have been better spent actually analysing the evidence base and trying to understand a complex planning process that none of us had prior knowledge or experience of.

This objection raises my personal concerns about the consultation process, and the legal and soundness issues of site allocations SES30 and SES29. While I've not gone into depth on traffic, flooding or biodiversity — which others in the S13 Working Group have covered — I've focused on what I feel hasn't been said enough, based on my experience, my professional knowledge and engagement with residents.

I know this submission is lengthy. I've tried to keep it concise, but as Sheffield City Council has directed us to raise all concerns directly with the Planning Inspectorate, this is my only opportunity to be heard. *That fact alone shows how unfair and inaccessible this process has been.*

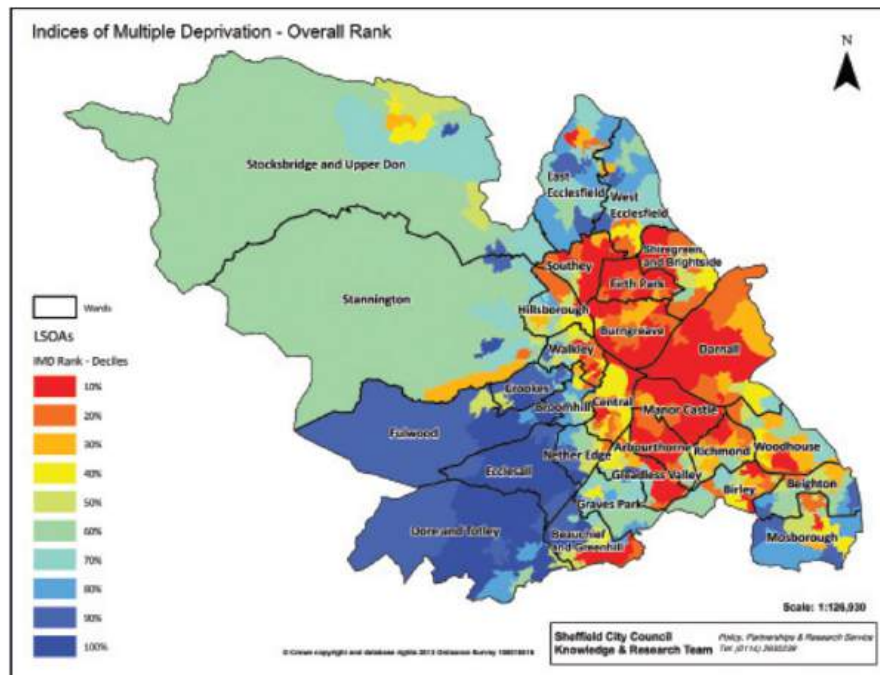
Balancing this with my full-time job and parenting has been hugely stressful. I've had no time to fully examine the thousands of pages of evidence or respond in full to issues like sewage capacity, air pollution, health infrastructure, or duty to co-operate. This process has left residents like me doing the work that should have been transparent, inclusive, and properly supported from the start.



*This written objection is dedicated to **Sapphire McCarthy**, who founded our working group and led the "Save S13 Green Belt" campaign with unwavering passion and pride. At a time when our community felt divided and unheard, Sapphire brought us together — giving a voice to residents who had never before engaged in civic processes. Her leadership, energy, and passion for protecting S13 made this campaign possible. As we continue to challenge this unjust process, we do so with her spirit at the heart of our efforts — fighting for what is fair, and for what is ours.*

Context: Why S13 Matters

We have been repeatedly told by Sheffield City Council that this isn't about an East vs. West divide — but the data tells a very different story, and so does the Council's own evidence.



In its Fairness Commission Report (2020), the Council clearly acknowledges that:

“There is a clear divide running through the city, with wealth, employment, health and life chances concentrated more heavily in the South and West, while the East and North experience multiple forms of disadvantage.” (p. 10)

It goes on to state:

“Life expectancy is up to 14 years lower for a man living in the most deprived part of the city compared with one in the least deprived.”

When you look at this Local Plan through the lens of fairness, and hold in mind the communities that already have less, it is impossible not to see that we are being asked to take more. This is not fair distribution — **this is inequality by design.**

S13 is a working-class area, with higher-than-average rates of disability, long-term illness, and deprivation. Many residents are digitally excluded, elderly, or in insecure or low-paid work. We have lower levels of education. Less young people are going to university. Political engagement has historically been lower here — not because we don't care, but because we are often disconnected from decision-making and distrustful of political processes, as the Council itself admits:

“People in poorer parts of Sheffield often feel disempowered, disconnected from decision-making and distrustful of the political process.” (p. 14)

Our access to green space is already limited. SES30 and the surrounding fields are not just unused “open land” — they are our park, our daily dog walk, our running trails, our play spaces, our social space, and our wellbeing lifeline. The Council's own report emphasises the importance of protecting green spaces in communities like ours:

“Access to good quality green space is lower in deprived areas, yet these communities benefit most from it... Green space must be protected in areas where communities are already disadvantaged.” (p. 17)



Search for a location

LSOA ID E01007971

Population: 1,501

Urban area: 0.40 sq-km (79% of LSOA area)

Sheffield, England

73

Tree Equity Score

Ranked 311th of 338 LSOAs in Sheffield

Priority: HIGH

Current canopy cover: 15%

Canopy cover goal: 30%

Score Indicators

Priority Index

Income Ranking (IMD)

7,706 out of 32,844

Air pollution: PM2.5, NO2

7.1 µg/m3, 11.9 µg/m3

Health Ranking (IMD)

1,958 out of 32,844

Heat disparity

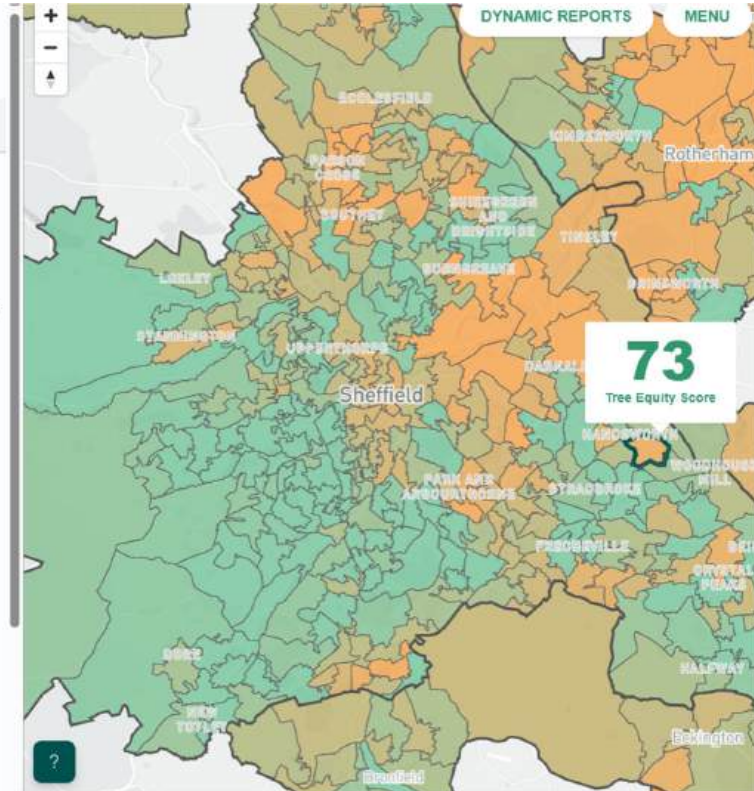
0.66° C

Employment Ranking (IMD)

6,104 out of 32,844

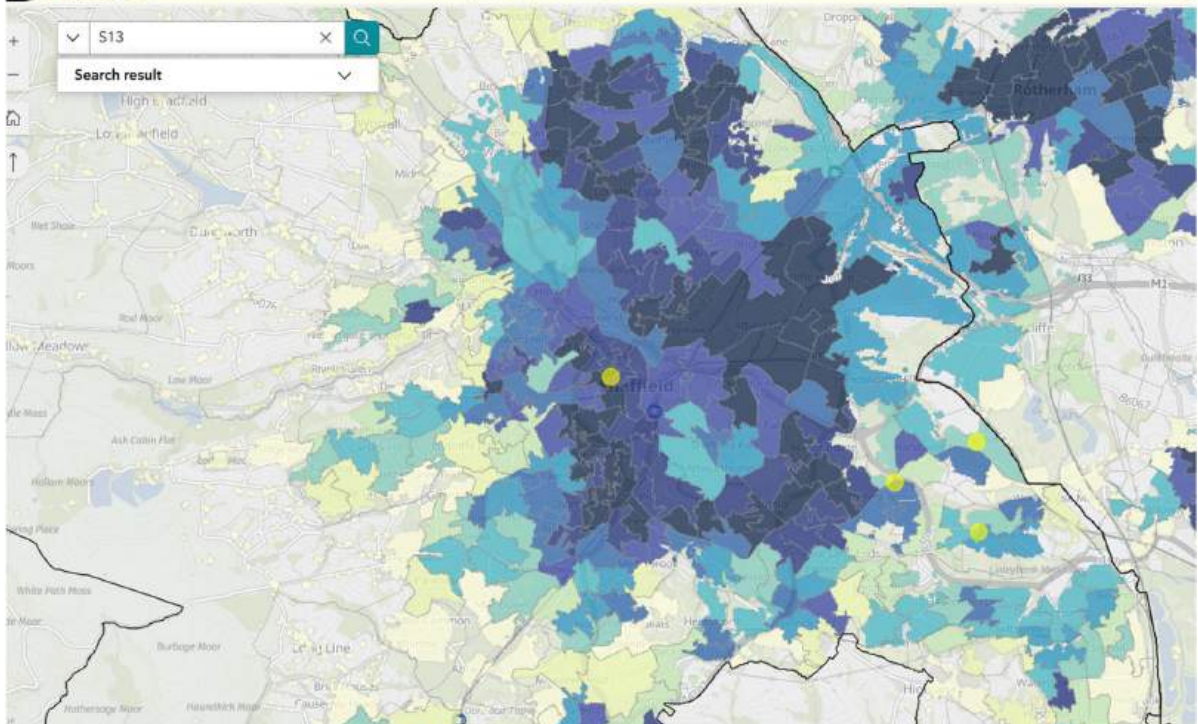
Children & older people

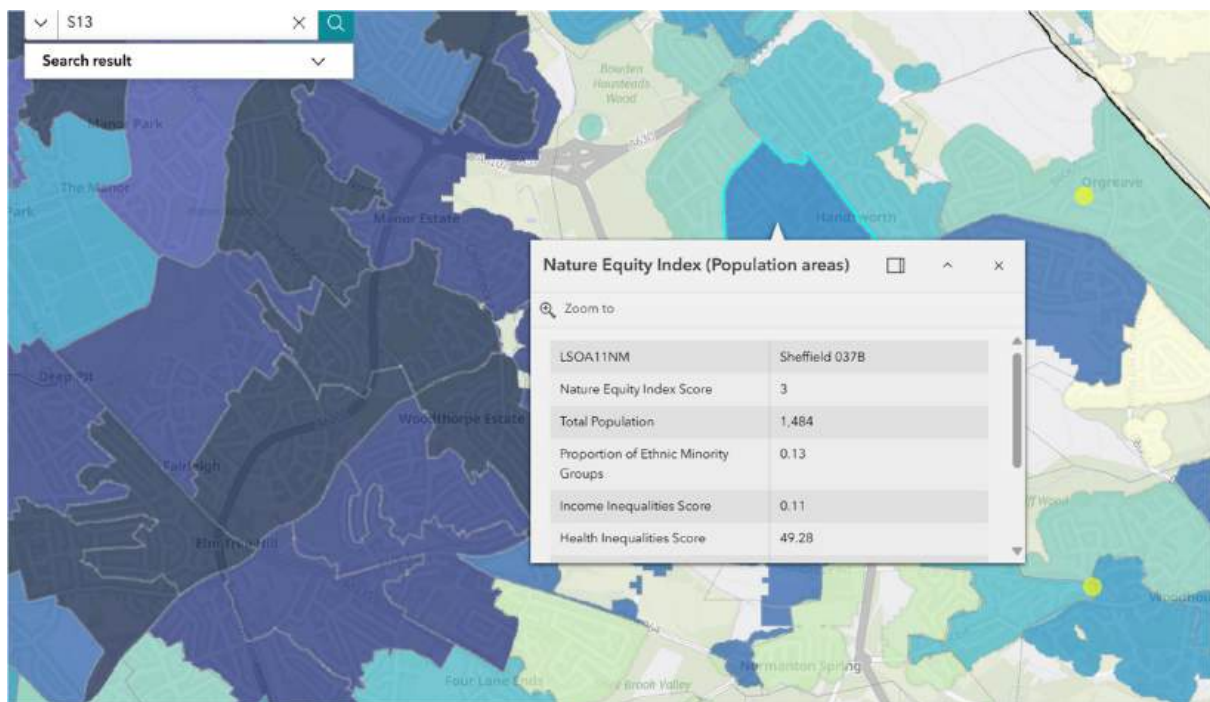
43%



Nature Equity Map

Special thanks to Dr Paul Brindley for his contribution in developing the index





Sheffield City Council has disproportionately allocated nearly 44% of its Green Belt development burden to the S13 community—an area marked by lower civic engagement (~24% turnout), higher disability (~19% households), lower education (~24% no qualifications), and limited digital access—while wholly sparing affluent wards in **Dore, Totley, and Whirlow** where turnout nears 50%, educational attainment and digital inclusion are high, and life expectancy exceeds 85 years. This stark imbalance reveals an unfair, inequitable process that ignores local capacity and widens existing inequalities. Such a skew cannot be considered proportionate or compliant with the inclusive principles of the NPPF (2023) or SCC's SCI.

This plan doesn't feel like it's about improving our community — it feels like it's about meeting housing targets in places where resistance will be hardest to organise. We may not be planning experts, but we are experts in our own lives. And we see clearly what this will mean for us. We might not be able to quote every policy or framework, we might not have our own sources of evidence to refute, but we feel the consequences of inequality. And what's being proposed here is not fair, not inclusive or equitable — and I'll now set out why I don't believe it is legal or sound.

The following sections have questions for the planning inspectors, as we have continuously been told to forward our questions to you. **I have highlighted Questions for the planning inspectors in red, for easier reading.**

Consultation Process – Lack of Fair, Transparent and Legally Compliant Public Engagement

My first objection on the grounds that the consultation process for the inclusion of additional Green Belt site proposals in S13—specifically SES30 and SES29—was neither legally compliant nor sound, and did not meet the standards outlined in the National Planning Policy Framework (NPPF, 2023) or Sheffield City Council's own Statement of Community Involvement (SCI).

An impossible time line - designed to limit engagement

On **24 April 2025**, Sheffield City Council publicly announced 14 new Green Belt sites, including SES30 and SES29 in S13. Many residents, including myself, only learned of this proposal at that point — yet internal documents show councillors had discussed these additions **as early as March**, with one suggesting S13 was “*prepared to take more of our fair share.*” Some of these same councillors later claimed they were unaware until the public release, raising serious concerns about transparency.

Just **five days later**, on **29 April**, the Council approved the inclusion of these sites. However, to submit questions or petitions to that meeting, residents would have needed to act by **25 April** — effectively **within 24 hours** of the announcement.

The crucial **14 May Council meeting** — where the Regulation 19 consultation was approved — was classified as “extraordinary,” barring public questions or petitions. Only after sustained pressure did the Council allow questions, giving us **less than 72 hours’ notice**. Our questions were read aloud at the meeting, met with a blanket response, and we were assured both in writing and verbally that our questions would receive a written response. 5 days later we were told the Council lacked capacity to respond, advising us to contact the Planning Inspectorate instead. We have still not received written answers to our questions.

In total, residents had less than three weeks to understand What a Local Plan is, understand this significant change, organise, and respond — with no prior local engagement or consultation. This sequence of events violates the principles of early, proportionate, and transparent engagement set out in Sheffield’s Statement of Community Involvement (SCI) and the National Planning Policy Framework (NPPF).

Q) Sheffield City Council has repeatedly told residents they could not extend the consultation period due to the tight timescales set by the Planning Inspectors. However, given that this is the same authority responsible for allowing its Local Plan process to fall years behind schedule, is it reasonable that residents are now being penalised with a rushed and exclusionary consultation — particularly when significant Green Belt changes were introduced so late in the process?

Did the Council ever formally write to the Planning Inspectors to request additional time in light of the scale of changes introduced on 24 April? If not, why not — and does this failure reflect a lack of commitment to the spirit of early, effective, and proportionate engagement as required under the NPPF and their own Statement of Community Involvement?

Q) What safeguards exist to ensure councillors do not withhold advance knowledge of major Local Plan changes from their constituents—particularly when meeting minutes show they were involved in Green Belt site discussions weeks before residents were informed?

2. Requests for Extension Ignored

Residents requested that the consultation be extended or reverted to Regulation 18. The Council had the discretionary power to grant this under its SCI but refused, citing the standard six-week period as ‘reasonable’. Given the volume of material, the significant changes

proposed, and the barriers faced by residents, this refusal was unjustified and excluded the community from meaningful participation.^[1]

Q)

1. Was Sheffield City Council within its powers to extend the consultation period in response to our requests?
2. If not, what prevented them from doing so — legally or procedurally?
3. If they were in a position to grant an extension, even by 2 weeks, but chose not to, does this not call into question their adherence to their own SCI and the broader principle of fair and inclusive consultation?

3. Barriers to Participation in S13

S13 is an area of low civic engagement, digital exclusion, and socio-economic disadvantage. The planning system's complexity, technical jargon, and tight deadlines created a hostile environment for engagement. Residents were left feeling overwhelmed and excluded. Volunteers hosted weekly drop-ins, with over 250 attendees, highlighting widespread confusion and lack of clarity about how to object.

Q) **How has Sheffield City Council met its legal obligations under the Equality Act 2010 and its own Statement of Community Involvement (SCI) by failing to provide accessible versions of the Local Plan documents or tailored outreach for digitally excluded, elderly, or disabled residents specifically in S13?**

We anticipate the Council may respond with statements like:

"Where possible, we adapted the format of those events to support people's involvement. There has also been separate engagement with specific interest groups – for example, those representing young people and older people."

(This is a direct quote from the Council Leader, Tom Hunt.)

However, this response is insufficient in the context of the Regulation 19 consultation and the late-stage inclusion of new Green Belt sites in S13, which is the actual subject of consultation. The groups referred to by the Council — such as citywide advisory panels for young people or older residents — are not comprised of people living in S13, nor do they represent the lived experience of our local community. These groups are often self-selecting, citywide in focus, and made up of individuals who are already engaged with Council processes. There is no public record of what was discussed, what or how information was presented, or how these groups were briefed on the late-stage Green Belt site allocations specifically. You only need to read Sheffield City Council's own Equality Impact Assessment to recognise how absent the specific needs of S13 are from their proposals. The EIA relies heavily on generalisations and fails to assess the impact on digitally excluded, disabled, working-class or care-experienced residents in our area. This reflects a deeply biased and top-down approach, where consultation appears to have been carried out with those easiest to reach, rather than those most directly affected. It is not equitable, and it does not meet the standards of inclusive or meaningful community engagement.

So we ask the Planning Inspectors directly:

Q) How can the Council claim it met its Public Sector Equality Duty and SCI requirements when it did not provide any site-specific accessible summaries, did not offer targeted outreach to the marginalised residents most affected (i.e. elderly and disabled within S13), and relied instead on generalised consultation with citywide groups not made up of the people whose lives, health, and local environment will be directly impacted by the site allocations?

In an area with high levels of digital exclusion, chronic illness, lower educational attainment, and political disengagement, the absence of tailored engagement is not just a procedural oversight — it's a failure of equity. It reflects a top-down, box-ticking approach to consultation, rather than one that genuinely includes the people most affected.

4. Strategic Inequality and Disempowerment

During a site visit, Cllr Douglas Johnson admitted that approving the current plan would 'save' further Green Belt release in other areas of Sheffield, confirming S13 was the 'sacrificial lamb'. This political trade-off undermines the objective basis for site selection. Planning decisions must not be made to shield more privileged areas at the expense of already marginalised communities.

Is the allocation of SES30 and SES29 in S13 'positively prepared' and 'justified' under NPPF tests of soundness, if councillors confirmed these sites were chosen in part to 'save' Green Belt elsewhere rather than for local sustainability or need?

5. Accessibility Failures

The Council failed to provide site-specific summaries or accessible materials. No easy-read or visual versions were made available, excluding digitally excluded and disabled residents. The Handsworth drop-in event was overwhelming and inaccessible. A formal complaint was submitted [2], but no response has been received to date.

In line with Sheffield City Council's Statement of Community Involvement, which states that consultation formats will be adapted "where a reasonable request is made," how does the Council justify failing to make accessibility adjustments at the 23 June Handsworth drop-in event — after I made a verbal reasonable adjustment request on the day, and again in a formal written complaint dated 26 June, specifically requesting support to engage with the consultation process in a way that accommodates my disability? Both requests were ignored. How is this compliant with the SCI and the Equality Act 2010?

4. Lack of Transparency and Informed Engagement

At the drop-in events, several Council officers were unable to answer basic questions about the technical evidence underpinning the site selection process. When asked about infrastructure, ecology, and traffic modelling, we were told that much of this work was still "being finalised" or that we should "submit questions to the Planning Inspector" or "submit an FOI request."

This reinforces our concern that decisions about releasing Green Belt land in S13 were made before a proper evidence base was finalised. If the council had extended the consultation process, or reverted back to Regulation 18 (considering the plan has had a drastic change from no greenbelt to green belt) the council would have recognised these valid concerns from locals and could have attempted to demonstrate a sound local plan that considers local need and viability concerns.

6. Lack of Reasonable Communication

The new Green Belt sites were announced through a single press release [3]. There was no letter drop, signage, or outreach. The Council claimed limited resources while residents used personal funds and time to raise awareness. This diverted efforts away from reviewing technical documents and forming responses.

Was the Council's failure to publicise the new sites beyond an online press article (with no local signage, letters, or briefings) compliant with SCI standards for inclusive and accessible community engagement, particularly in a socioeconomically deprived area like S13?

7. Integrity of the Evidence Base in Question

The evidence provided appears to rely heavily on city-wide or national frameworks rather than localised assessments tailored to the conditions and constraints of the S13 area. This directly contradicts the NPPF 2023, which states that plans must be underpinned by “an appropriate, up-to-date, and proportionate evidence base.” Effective evidence, according to the Planning Practice Guidance (PPG), should be locally relevant, clearly scoped, and focused on how planning issues arise in the specific plan area—not generic in nature.

It is particularly concerning that some technical documents used to justify the inclusion of SES30 were only finalised 29 May 2025—the same day the consultation launched. Another document submitted in support of the plan appears to have had its date altered, raising further questions about document integrity and whether the evidence was retrospectively tailored to justify predetermined decisions.

Report to: Sheffield City Council
Report Title: Sheffield Plan – Appropriate Assessment
Version: 4.0
Issue Date: May 2025
Report Ref: 23619-HRA

Originated By:



Stuart Ireland
Head of Ecology Date: 22.05.2025

Reviewed By:



Samantha Shove
Technical Director Date: 29.05.2025

Approved By:

Insert Signature
Staff Member
Job Title Date: Insert Date

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Version	Author	Description	Date
V0.1	SI	First draft	27/04/2025
V0.2	SS	Technical QA	29/04/2025
V1.0	SI	Draft for client review	29/04/2025
V2.0	SI	Consultation Issue	06/05/2025
V2.1	SI	Minor amendments following client comments	13/05/2025
V3.0	SI	Final	22/05/2025
V3.1	SS	Minor amendments following client comments	29/05/2025
V4.0	SS	Final	29/05/2025

Integrated Impact Assessment Report (Update and Addendum)

April 2025

The timing and content of the evidence suggest that these documents were used to post-rationalise a site allocation decision, rather than to inform it. I'm struggling to understand how this is the correct process? The PPG makes clear that "evidence should support intelligent plan-making," not act as a legal defence after the fact. In this case, the community was expected to engage with thousands of pages of complex technical documents without plain-English summaries, in a narrow six-week timeframe, with no confidence that the information was independently or objectively gathered.

The appearance of "evidence-chasing a decision" rather than using evidence to lead decisions severely undermines the plan's credibility and public trust. It calls into question whether the Plan has been positively prepared and justified, as required under the NPPF tests of soundness.

There is no visible audit trail, published project brief, or public sign-off process for key SES30/SES29 documents. It is unclear who commissioned these reports, when they were commissioned, or how they were quality-assured. In fact, several reports are authored by external consultants—yet no clarification is provided on whether the Council or the consultants will defend these findings at examination. This is especially relevant considering the council itself admits that they were not part of some of the discussions between key stakeholders and the authors of the reports [4]. It's been clear within this consultation process that the majority of councillors and council officers, including the Leader of the council himself, Tom Hunt - haven't even read these reports. I find that a wild concept to understand how you can advocate for a sound local plan, when you don't know what the plan actually entails. The Council has not responded to a Freedom of Information request submitted on this matter, further compounding the lack of transparency.

How can Sheffield City Council demonstrate that the inclusion of SES30 and SES29 is "positively prepared" and "justified" under NPPF paragraph 35, when key supporting evidence was finalised on the same day the consultation launched, appears to lack an audit trail, and fails to reflect localised conditions specific to S13 as required by NPPF paragraph 31 and Planning Practice Guidance?

Further:

In the absence of transparency over who commissioned these reports, when they were scoped, or how they were quality-assured—can the Inspectors be confident that this evidence genuinely informed plan-making, rather than retroactively justified decisions already made?

Summary: As an Occupational Therapist, assessment always comes first. Before recommending any intervention, I spend time understanding the person in front of me — their environment, strengths, limitations, and lived experience. We don't make general assumptions. We don't apply a standardised intervention based on national averages. We start with the individual, then build a plan around their needs.

This Local Plan process has felt like the opposite. The “treatment” — releasing SES30 and SES29 for development — was decided first. The “assessment” — the additional supporting evidence base — came after, and is largely drawn from city-wide or national frameworks, not the specific circumstances of S13.

To put it bluntly: it's like recommending a sensory intervention or mobility aid for a patient I've never met, based solely on national health data and a tick-box checklist — without ever stepping into their home or speaking to their family. That wouldn't just be poor practice — it would be unethical.

Planning should be no different, surely? It should be grounded in the local context, shaped by the people it affects, and underpinned by credible, peer-reviewed evidence. In this case, the Council's approach undermines both the principles of what I assume good planning is and the trust of the community it's meant to serve.

An unfair advantage

Between 6 February and 29 May 2025, Sheffield City Council's planning department — a full-time team of 11 qualified professionals — had 113 days to prepare, update, and finalise the Local Plan evidence base, much of which was outsourced to external consultants using public funds. This was not a new process for the Council — it follows years of preparation to update a Local Plan whose core policy documents date back to 2009 (Core Strategy) and even 1998 (Unitary Development Plan). These must be some of the most outdated planning policies in the country, and Sheffield has known for years that an urgent update was needed.

In contrast, residents like myself — who didn't even know what a Local Plan was until 24 April 2025 — were given just six weeks to read thousands of pages of technical material, raise awareness within our community, understand complex planning law, write formal objections, attend chaotic drop-in events, and support neighbours in our community — many of whom are vulnerable, digitally excluded, or living with chronic health conditions.

How can this possibly be considered fair or inclusive? The imbalance in time, knowledge, capacity, and resources between a fully staffed planning authority and ordinary residents — most of whom are working-class, full-time workers, carers, disabled, or unfamiliar with planning frameworks — **represents a structural disadvantage**. It undermines the very principle of public participation, enshrined in the NPPF and Sheffield's own Statement of Community Involvement.

If this is considered a “normal” consultation process, then it is a system that is not fit for purpose and undermines everything we believe about democracy — and it urgently needs challenging, not just locally, but at a national level.

So I respectfully ask the planning inspectorate, is this considered a standard and acceptable model of public consultation under current national planning policy and practice?

If so, how can communities like ours — who experience structural disadvantage due to health, education, and digital exclusion — meaningfully challenge or improve this process at a national level? What reforms would the Inspectors recommend to ensure future Local Plan consultations are truly inclusive, proportionate, and accessible to all?

Objection: Unfair and Disproportionate Distribution of Green Belt Release in S13

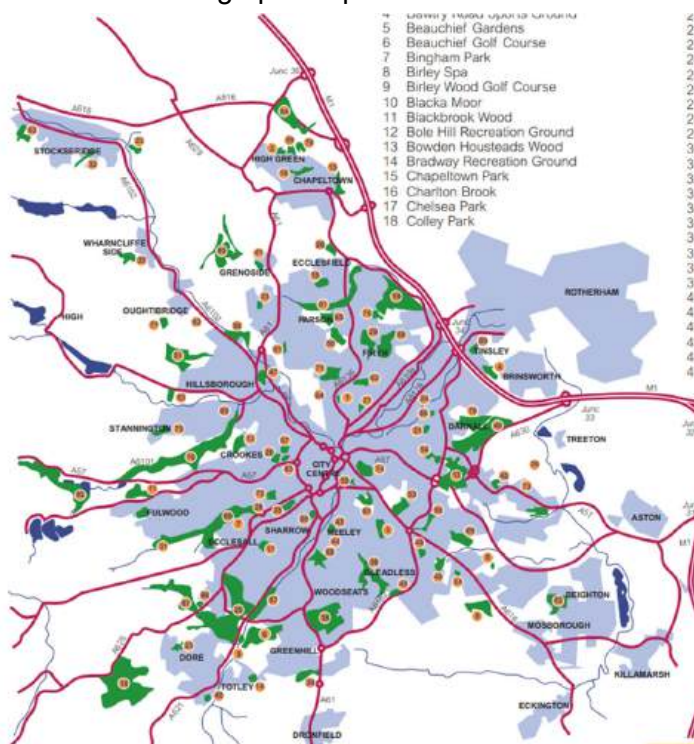
Secondly, I strongly object to the proposed release of Green Belt land in S13—SES29 and SES30—on the grounds that it represents a disproportionate and inequitable distribution of new housing development across Sheffield, placing an unjust burden on an already under-resourced part of the city.

1. Nearly Half of All Green Belt Release is Concentrated in S13

According to the Council's own figures and maps, approximately 44% of the Green Belt land proposed for release across Sheffield is located in S13, across sites SES30 and SES29. These large allocations are concentrated within a small geographic area, straddling major route Handsworth Road which already suffers from significant traffic congestion, worrying levels of air pollution and limited reliable public transport. They are also both within a short walking distance to Waverley Housing development site, which itself feeds off the infrastructure in S13.

2. Our Only Accessible Green Space Is Being Taken

S13 lacks the public green space infrastructure that is abundant in more affluent areas of West Sheffield. Unlike wards such as Ecclesall, Fulwood, or Dore and Totley, S13 residents do not benefit from large public parks or close access to the Peak District.



(Map of Sheffield's public parks - note, this is actually incorrect both 30, and 73 are incorrectly placed on this map)

Instead, we rely on the fields around Bramley Lane and Beaver Hill Road as our local green lungs — for walking, exercise, socialising, dog walking, and children's play.

Other sites were reportedly dismissed during the plan process due to being classified as “informal green space,” “wildlife site” or “sports field.” Yet no such weight has been given to the active community use and wildlife of these S13 fields, despite their identical function.



I’ll be honest — as a resident and not a planner, I don’t fully understand what the Local Plan is required to provide in terms of hectares of green space per household. The terminology used is inaccessible, and most residents I’ve spoken to don’t understand what’s meant by “2 hectares within 300 metres” — but what we do understand is lived experience. We know when space feels scarce, when we’re boxed in by roads, and when families have nowhere green and peaceful to walk to.

At a public drop-in event, we were told that the loss of accessible Green Belt in SES30 would be “compensated” by reclassifying the playing fields of Handsworth Secondary School and Ballifield Primary School as public open space. These are school fields — not public parks. Children and families cannot just walk in and use them freely. The idea that fenced, privately controlled educational fields can be used to compensate for the loss of publicly accessible, natural green space is frankly absurd. It feels like a tick-box exercise to meet a metric rather than a meaningful response to community need.

Q) How can the Plan be considered “positively prepared” or “justified” when the Council is proposing to compensate for the loss of accessible Green Belt land (SES30) by reclassifying the fenced-off playing fields of local schools — facilities that

are not freely accessible to the public? Is this approach consistent with national policy standards on public open space, such as those outlined by Natural England (ANGSt) and expected in local plans?

3. Health Inequalities and Access to Nature

Sheffield's own strategic documents — including the *Health is Wealth* Report (2025), the *Green and Open Space Strategy* (2010–2030), and the *Fairness Commission Report* — consistently recognise that access to local green space is essential for reducing health inequalities, particularly in deprived communities. These policies highlight that disadvantaged areas already face worse health, limited access to nature, and fewer protective wellbeing factors — and explicitly warn against the unequal loss of green space. The proposed release of SES30 and SES29 in S13 directly contradicts these aims, removing one of the few publicly accessible green spaces in an area with some of Sheffield's worst health outcomes, lowest life expectancy, and least civic influence. To proceed with this plan would not only widen existing health disparities — it would undermine Sheffield's own commitments to fairness, equity, and prevention-driven public health.

4. Access to the Peak District is Not Equivalent

It is often assumed in planning arguments that all Sheffield residents benefit equally from proximity to the Peak District. This is not the case for S13 residents, who must travel considerable distances — often by car or with multiple buses — to access national parkland. In contrast, residents in West Sheffield wards can walk or cycle to moorlands, trails, and parks directly from their neighbourhoods.

Equality Impact Assessment: Inadequate and Misapplied

The Equality Impact Assessment (EIA) for the April 2025 proposed site allocations — including SES30 and SES29 in S13 — fails to meet the legal standard required under the Public Sector Equality Duty (Equality Act 2010) and undermines the principles set out in Sheffield City Council's own Equality Framework. As an Occupational Therapist, I am disheartened by the effort that has been put into this assessment.

Despite being a statutory document intended to assess how proposed policies affect those with protected characteristics, the EIA largely consists of generic statements and broad assumptions. The assessment appears to have been adapted from previous versions written for city centre developments and was not meaningfully revised to reflect the very different communities affected by the new Green Belt site allocations.

For example, the EIA includes the statement:

“An increase in dwellings in the city centre will have a positive impact on the age equality characteristic...”

— This is completely irrelevant to S13, a working-class suburban area with high rates of disability, chronic illness, and elderly residents. The failure to distinguish between city centre and Green Belt contexts shows that this was not a targeted or thoughtful assessment.

The EIA also states:

“No specific impacts on people with protected characteristics are expected to arise as a direct result of the allocation of additional sites.”

This is deeply concerning. As a resident of S13 — and someone with a disability — I can say with certainty that the consultation process was not accessible. There were no site-specific summaries, no easy-read documents despite my request, and the Handsworth drop-in event

was overwhelming and inaccessible. I submitted a formal complaint and made a reasonable adjustment request, both of which were ignored.

I believe this EIA was not carried out in the spirit of its purpose — to proactively identify and mitigate risks to marginalised groups. It appears to have been used after the fact, to justify decisions already made, and does not include meaningful site-level analysis.

Also, it took me a while to even find this updated assessment. After requesting it through the equalities email, I was sent the wrong report.^[5] When I asked for the updated EIA, they didn't reply.

Summary

The proposed Green Belt release in S13:

- **Disproportionately targets one part of the city** with nearly half of all release land;
- **Removes one of the last remaining accessible natural spaces** in the area;
- **Ignores public health guidance** about access to green space and community wellbeing;
- **Worsens health and environmental inequalities** between East and West Sheffield.

For the Local Plan to be considered “**justified**” under the soundness tests set out in paragraph 35 of the NPPF, it must demonstrate that reasonable alternatives have been considered and that its chosen strategy is based on proportionate evidence. In a city with wide disparities in health, income, and green space access, this surely must include ensuring that the distribution of housing growth is fair and not disproportionately borne by disadvantaged communities. A failure to equitably assess site options or to fairly share the impacts of development calls into question the justification and integrity of the Plan. That has not happened here. I therefore strongly oppose the inclusion of SES30 and SES29 and call for the Council to withdraw these sites from the Plan.

Objection: Loss of Accessible Green Space (Plan is Not “Sound”: Not Justified, Not Effective, Not Consistent with National Policy)

The proposed development at SES30 would result in the removal of the vast majority of accessible green space for residents in Handsworth and Woodhouse. Sheffield City Council has not provided a clear or site-specific assessment of what green space will remain or how it will meet the needs of the growing population in this part of the city.

1. No Evidence of Greenspace Impact Assessment

Despite the NPPF 2023 requiring that development support “healthy communities”, and Public Health England (2020) stating that accessible greenspace must be treated as “essential infrastructure”, the Council has failed to:

- Identify how many hectares of walkable greenspace will remain per resident
- Clarify which spaces meet accessibility standards for disabled residents
- Assess the health, safety, or wellbeing implications of removing this valued land

In effect, the Plan removes community-used land without evaluating the impact on quality of life, especially in an area of higher-than-average health needs.

PHE (2020): “People in areas with the least green space are more likely to experience poor physical and mental health... fairer access is key to reducing health inequalities.” (*Improving Access to Greenspace*, p.6, p.12)

2. Shirtcliff Woods Is Not a Suitable Replacement

The only remaining green space within walking distance of SES30 will be Shirtcliff Woods, a designated ancient woodland. While this space is vital to the area's biodiversity, it is:

- Not flat or open, making it unsuitable for informal recreation
- Located in a steep valley, making it largely inaccessible for residents with mobility issues, chronic pain, or pushchairs
- Currently used predominantly by Woodhouse residents, as the SES30 fields act as a natural buffer that reduces footfall and protects the woodland and its wildlife.

Building over 800 homes, a secondary school, and a burial site on SES30 would likely turn Shirtcliff Woods into the sole available green space for thousands of residents — leading to overuse, degradation, and irreversible harm to a protected ecological site.

This development would not just destroy a beloved field. It would expose a fragile and ancient woodland to damaging levels of footfall, fundamentally altering its ecological balance and accessibility.

3. Inaccessible to Many, Unjust for All

For many residents of S13 — especially the elderly, disabled, or those without cars — SES30 is their only accessible, safe, and flat open space. Replacing that with a woodland valley does not meet the planning requirement to maintain access to “*inclusive and safe places*,” as stated in NPPF

PHE (2020): “*Car ownership should not be a prerequisite for accessing green space.*” (p.25)

If this site is built on, what are we actually left with? There is no other public park, open field, or equipped recreational space within walking distance for many in this area — a community already experiencing inequality, poor health, and limited transport options.

Objection: Infrastructure Concerns – Health Provision (Plan is Not “Sound”: Not Justified or Effective)

I object to the inclusion of site SES30 in the Local Plan on the basis that the health infrastructure implications of this proposed development have not been properly assessed or addressed, contrary to the requirements for a sound plan under the NPPF

1. No Localised Health Needs Assessment for S13

The Plan proposes 1,700+ additional homes across S13 Green Belt sites, potentially bringing thousands of new residents into the area. However, there is no evidence of a site-specific health needs assessment for this population increase. Sheffield City Council officers confirmed at the public consultation events that no such localised health report exists.

When residents asked for further detail, we were directed to submit a Freedom of Information (FOI) request to obtain basic information about whether the Council had engaged with the NHS or the Integrated Care Board (ICB). This is not transparent planning.

[6]

Without a clear and published assessment of the current health capacity in S13—including GP and dental services, hospital referrals, and adult social care—the Plan cannot be said to be “justified” or “effective” in terms of infrastructure delivery.

2. No Evidence of Meaningful “Duty to Cooperate” with the NHS or ICB

The Council has claimed that it has met the Duty to cooperate with key infrastructure partners. However, when pressed, officials stated that discussions with the ICB occurred “between the report author and the ICB”[41]—with no published outcomes or written confirmation of those conversations.

There is no published Memorandum of Understanding, letter of support, or health impact assessment for SES30 or S13 in general.

This directly undermines the Local Plan’s effectiveness under the soundness tests and does not meet the requirements of collaborative infrastructure planning as set out in NPPF

3. Existing GP and Dental Provision is Already Overstretched

Residents in S13, especially those served by Woodhouse Surgery, already experience significant delays and appointment shortages when trying to access GP care. Local dentists are also at capacity, with many reporting no availability for new NHS patients, particularly adults. I am currently unregistered at a dentist due to no availability within the local area. Last time I called the GP was due to a serious developing cellulitis infection, when I called at 8.05am the queue system was so long, I couldn’t even be placed in a telephone queue. The line just apologised and hung up on me. I had to go to multiple pharmacies for help, finally finding a pharmacy that had an available pharmacist who was able to prescribe antibiotics.

Introducing hundreds of new homes without confirming how basic healthcare services will be expanded is deeply irresponsible and clinically unsafe, this renders the plan ineffective.

4. Public Health Needs in S13 Are Higher Than Average

S13 has one of the highest birth rates in Sheffield, as well as a large population of elderly and chronically ill residents. Census data confirms that disability and long-term illness rates in this area are above the city average.

Despite this, there has been no visible health strategy to accompany the development proposals. This risks creating a significant health access gap for existing residents, as well as placing impossible pressure on local services.

Summary

This section of the Sheffield Local Plan is not “sound” under the NPPF 2023 definition because:

- It is not justified: there is no evidence base to show the health infrastructure impacts in S13 have been considered.
- It is not effective: the Plan provides no delivery mechanism or commitments from health bodies to manage the additional population load.

This represents a failure of strategic planning and a lack of duty to cooperate, and I therefore object to the inclusion of SES30 in the Plan.

Objection: Flooding Risk (Plan is Not “Sound”: Not Justified or Consistent with National Policy)

I object to the proposed development of SES30 due to the known flood risks in the surrounding area, and the failure of the Plan to clearly demonstrate how these risks have been properly assessed, mitigated, or communicated.

1. Known Local Flooding Issues – Beaver Hill Road

Beaver Hill Road has a long history of surface water flooding, particularly during periods of heavy rainfall, which are becoming more frequent and intense due to climate change.

Residents in the area have repeatedly observed:

- Water pooling and overflowing onto pavements and roads
- Blocked drains and insufficient run-off management
- Increased flooding risk during autumn and winter months

The proposed development would remove permeable green field land and replace it with hardstanding, homes, and roads — likely exacerbating runoff and increasing flood risk for existing residents.



Objection: Sewage Infrastructure in S13: A contradiction in national policy and local planning

The Infrastructure Delivery Plan Addendum (v2.1) acknowledges a significant issue regarding foul drainage in the Handsworth/S13 area. It states:

"Insufficient capacity in the foul drainage network has been identified in the Handsworth area. Yorkshire Water have advised that a developer-funded solution will be required to resolve this issue."

This means that despite already overstretched sewage infrastructure, Sheffield City Council is proposing to release SES30 — a major Green Belt site for development — without a confirmed or funded solution in place. This is particularly alarming in light of the national agenda to hold water companies accountable for sewage discharges into rivers and watercourses.

How can the Council justify adding thousands of additional homes in an area where the foul drainage network is already inadequate — especially when the burden of fixing it will fall on private developers who may delay or seek to minimise costs?

This Local Plan fails to uphold environmental responsibility. It directly contradicts national efforts to reduce water pollution, as it risks further sewage overload in a community that already lacks investment in critical infrastructure. The public is being asked to trust that developer-led mitigation — with no transparency or guaranteed timeline — will protect our local environment. That is not good enough.

Objection: Air Pollution Concerns

I object to the inclusion of SES30 in the Sheffield Local Plan on the basis of existing and future air pollution impacts, and the lack of any credible mitigation strategy. The allocation of a large development site in an already polluted corridor, without analysis or action, is incompatible with local public health priorities, environmental equity, and national climate policy.

1. SES30 and SES29 Lies in a High Traffic Corridor Already Prone to Air Pollution

The proposed development site borders Beaver Hill Road and Retford Road, and Handsworth Road to Sheffield Parkway which are already known for:

- Daily congestion during school hours and rush hour
- Heavy vehicle traffic, including buses and lorries
- Residential homes, schools, and pedestrians exposed to roadside emissions

No air quality modelling or health impact assessment has been shared publicly to demonstrate how adding 1,700+ new homes and a secondary school will affect air pollution levels or mitigate existing risks. The only available pollutant level readings I can find online are below,

Site	163 Handsworth Road
Further Information	Handsworth and Darnall
Pollutant	Nitrogen Dioxide
Tube Group	Community
Tube Number	404
Pollutant levels (µg/m ³) in 2023	32

Air pollution levels in Handsworth already hover dangerously close to or exceed the UK's legal limit for Nitrogen Dioxide (NO₂), with figures between 32–42µg/m³—well above the WHO's recommended level of 10µg/m³. PM2.5, though lacking a UK legal cap, is recognised as harmful at even low levels, and residents here are regularly exposed beyond the WHO's 5µg/m³ threshold.

Despite this, the Local Plan proposes a major housing allocation at SES30 — increasing vehicle traffic, removing green space, and worsening emissions — in a community already facing poor health outcomes, high levels of childhood asthma, and limited safe walking routes. Multiple schools and nurseries are within close proximity, placing thousands of children at further risk. Air pollution is not only linked to respiratory illness, but also to attention difficulties, depression, and substance misuse, yet the Council's Equality Impact Assessment fails to meaningfully address these risks.

The EIA instead assumes air quality will improve over time due to a transition to electric vehicles — a sweeping and unrealistic generalisation. As a resident, I drive a 2006 petrol Ford Fusion because it's what I can afford. EVs remain out of reach for many in S13 due to high costs, limited infrastructure, and inadequate public transport alternatives. There is currently no confirmed funding or timeline for the proposed tram-train extension, yet this too is used to justify additional development.

Finally, the proposal directly contradicts Sheffield's Net Zero by 2030 ambitions and national air quality policy, which requires plans to “sustain and contribute towards compliance with relevant limit values or national objectives for pollutants.”

How can this Plan be considered sound or justified when it allocates a major housing site in an area already exceeding safe air pollution thresholds, relies on unproven transport shifts, and fails to provide mitigation for the disproportionate health risks to vulnerable residents and schoolchildren?

Objection: Housing Need – Flawed Assumptions and City Centre Neglect

I object to the inclusion of SES30 and SES29 on the grounds that Sheffield City Council has failed to justify why these Green Belt sites are necessary to meet housing need. The assumptions underpinning this allocation are flawed, outdated, and ignore more sustainable,

evidence-backed alternatives — particularly the potential for delivering family housing in the city centre.

1. Misguided Assumptions About Family Housing Demand

The Plan wrongly assumes families do not want to live in urban areas, using this to justify large-scale suburban expansion. This view is not supported by evidence, and directly contradicts some national best practice and research — including the *Family Housing in City Centres* report (HCA, 2009) — which highlights how families will choose city centre living when housing is well-designed, safe, and connected to schools, services and green space.

Other cities like Manchester, Nottingham, and Birmingham have embraced this model, successfully attracting families to city centres through mixed-tenure, larger, well-managed homes.

Meanwhile, Sheffield has:

- A surplus of underused city centre land
- A glut of one-bed flats and student blocks
- Low levels of affordable, family-sized units in urban locations

Instead of tackling these issues, the Plan bypasses city centre regeneration in favour of displacing families to peripheral sites like SES30 — increasing car dependency and harming public health.

2. Weak Strategic Case for SES30

No robust evidence is presented to suggest a unique housing need in S13. The supporting documents rely on city-wide housing targets, but fail to demonstrate:

- Why S13 is particularly suitable to meet this need
- Whether more sustainable brownfield alternatives have been fully assessed
- How the homes proposed meet the specific demographics or affordability needs of the area

There is no localised demand case — only a generic one — which cannot pass the “justified” test under NPPF.

3. City Centre Decline and Missed Opportunity

Sheffield city centre is struggling with reduced footfall, remote working trends, and vacant retail units. Increasing family occupancy could:

- Boost local economy
- Improve safety and vibrancy
- Align with net zero and clean air targets

Instead, the Council is choosing edge-of-city, car-reliant sprawl — the opposite of sustainable development.

Failure to Follow Inspector Advice on Site Distribution and Family Housing

The inclusion of SES30 and SES29 in the Sheffield Local Plan contradicts key advice issued by the Planning Inspectors in their post-hearing letter dated 6 February 2025.

1. Ignoring the Call for a Wider Spread of Sites

The Inspectors clearly recommended that Sheffield City Council explore a broader distribution of sites — including smaller greenfield allocations — to ensure a fairer and more sustainable development pattern across the city. They wrote:

“We requested at the Stage 1 hearings that [the Integrated Impact Assessment] should be expanded to include smaller site options on greenfield land in the Green Belt... as a reasonable alternative strategy.”

Rather than taking this advice forward, the Council chose to allocate 14 new Green Belt sites at the last minute, with a **disproportionate 44% of this burden placed on one community — S13 and also unfairly burdening S35**. This is not the “wider spread” of sites the Inspectors requested. It is the opposite: a rushed, concentrated strategy that targets a disadvantaged area with limited political power, while exempting other wards with higher socio-economic indicators.

2. Outdated and Unsupported Assumptions About Family Housing

The Local Plan assumes that family housing cannot be delivered in the city centre — and that Green Belt release is the only viable option. However, the Inspectors directly challenged this position:

“Sheffield benefits from a large existing stock of houses and the Council has suggested there could be scope to increase the proportion of people living in flats in the future.”

“The Council’s Strategic Housing Market Assessment 2018... identifies a specific need for additional houses for families... [but] this information has not been updated in the more recent Local Housing Needs Assessment (2024).”

This highlights two major flaws in the Council’s strategy:

- No updated evidence has been provided to show that city-centre family housing is not viable.
- No serious attempt has been made to repurpose existing underused city-centre space to accommodate families.

Instead, the Council continues to approve one-bedroom apartments and student blocks in the city centre, while pushing family housing to the fringes — in areas like S13, where car dependency will increase pollution, congestion, and infrastructure strain.

3. No Site-Specific Justification for SES30

The Inspectors stated clearly that Green Belt release must be:

“Based on sound evidence and site-by-site justification.”

Yet there is no localised evidence to support building on SES30. There is no specific S13 housing need assessment. There is no infrastructure plan for how this community will absorb 1,700 new homes. There is no evidence that other options — like brownfield or inner-city regeneration — have been fairly evaluated.

The Council’s allocation of SES30 and SES29 directly undermines the Inspectors’ advice. It ignores the need for a wider, fairer site distribution and relies on outdated assumptions about where families want to live. No updated city-centre housing strategy has been published. No new analysis has been carried out to assess whether demand could be met more sustainably through regeneration.

Q) Do you believe the Council has complied with your February 2025 direction to explore a wider spread of smaller development sites and revisit the assumptions underpinning family housing in Sheffield? Or does the rushed addition of 14 Green Belt sites — disproportionately concentrated in S13 — indicate a failure to follow your guidance and conduct a fair and justified allocation process?

Objection: Inaccessible Submission Process and Lack of Confirmation Undermining Public Participation

The final stage of this consultation has only deepened the community’s mistrust and feelings of exclusion. Many residents in S13, already facing digital exclusion and limited access to devices like personal laptops, have struggled to engage with the Council’s preferred submission method via the online portal. The portal frequently fails to load, times out, or presents error messages — a fact acknowledged informally by Council officers but never resolved.

The alternative submission method via email has been offered, yet it remains riddled with problems. Many residents report sending objections with no confirmation of receipt. Some have received acknowledgements days later, others not at all. One resident who phoned to check was told their objection was not on record. They were then directed to call 0114 273 4157 — a number that, in multiple cases, rings out with no answer.

On top of this, the official template for submission is inaccessible to residents writing their objections on mobile phones, many of whom do not have access to Microsoft Word or a PC. This further disadvantages low-income households and digitally excluded individuals — the very people this process should be designed to support.

Given the significance of this consultation and the scale of the proposed Green Belt release, the Council had a duty to ensure a clear, accessible, and trustworthy submission process. Instead, we’ve faced confusion, technical barriers, and a lack of consistent communication — all of which amount to a serious failure in public engagement.

As I finish writing this objection — the day before the consultation deadline — I do so after weeks of balancing full-time work, parenting alone, and supporting my local community in trying to navigate this process. Many S13 residents have already submitted their objections, or at least tried to. People are anxious and unsure whether their voices will even be heard. After everything we've already overcome just to understand and engage with this process, it is heartbreaking that so many are being silenced at the final hurdle.

Q) How can the consultation on these late-stage Green Belt sites be considered lawful, sound, or inclusive when residents in S13 — many of whom are digitally excluded — have faced repeated technical barriers, inaccessible documentation, and no confirmation of receipt for their objections?

Does this meet the standards of fair consultation required under the NPPF, the Council's own Statement of Community Involvement, and the Equality Act 2010?

What We Are Proposing: A Fairer, Community-Led Future for S13

As residents of S13, we are not professional planners, lawyers, or developers. We are working-class people, many with limited time, access, or prior knowledge of how planning decisions are made — but we care deeply about our community, our health, our environment, and our future.

This consultation has been inaccessible, rushed, and overwhelming. We have had six weeks to the day to:

- Understand what a Local Plan even is
- Learn the difference between “sound” and “legal compliance”
- Interpret thousands of pages of technical documentation
- Write detailed objections to defend the only green space we have

We have received no meaningful support from the Council during this time. Repeated requests for help — including guidance on how to submit a Neighbourhood Plan — have been ignored.

Despite this, we have organised ourselves. We have raised awareness, held meetings, supported digitally excluded residents, and educated one another. And now we are asking to be taken seriously.

We Propose:

1. The Immediate Removal of SES30 and SES29 from the Local Plan

These sites were added late, without prior consultation, and disproportionately target a working-class community with existing health and infrastructure challenges. The evidence base does not justify their inclusion.

2. A Community-Led Vision for the Site: Nature, Health, and Togetherness

Instead of housing, we propose that this land be designated as a protected local green space, with potential to evolve into a community nature reserve, like Shirebrook Nature Reserve — but owned, used, and shaped by the people of S13.

Features could include:

- Woodland regeneration and wildflower zones. A wildflower meadow honouring Sapphire McCarthy and her impact within our community.
- Accessible walking paths and sensory trails

- A nature-based play area for children
- Community-led wildlife and climate education projects

This would directly support Sheffield's climate, health, and inclusion goals.

3. The Development of a Neighbourhood Plan for S13

We request formal support from Sheffield City Council to begin the Neighbourhood Plan process, allowing the community to co-design a vision for its future development, land use, and green space protection — just as communities in more affluent areas of the city have done.

We have already emailed the Council requesting information on this and received no reply. We ask this formally again now.

4. Investment in a Community Hub for Handsworth

Unlike many other areas of the city, Handsworth does not currently have a dedicated community centre or indoor gathering space. With the right investment, a nature-based site hub or small visitor facility could serve as:

- A wellbeing space
- Venue for workshops and outreach
- Local café or youth hub
- Anchor for intergenerational connection

Final Words

We may not have always had the language, tools, or platforms to engage with planning policy — but that does not mean our views should be ignored.

We are awake now. And we are asking for the chance to shape our future, not just defend it.

We respectfully urge the Planning Inspectors and the Council to:

- Listen to our concerns
- Recognise the injustice of this proposal
- And support a fairer, healthier, greener alternative for the people of S13

Thank you for your time reading this,

Sincerely,

Sadie Charlton

Resident of S13 and member of the working group "Save S13 Green Belt: The Sapphire McCarthy Campaign"

Appendix of evidence

[1] Copy of email sent by S13 Residents to 84 Sheffield City Councillors before May 14th, requesting extension

I am writing as a resident of S13 to formally object to the proposed release of Green Belt land at Bramley Lane (Site SES30) and Finchwell Road (SES29) in the updated Sheffield Local Plan.

These two sites — both in S13 and less than a mile apart — are now being proposed for large-scale housing development, despite never being part of previous public consultations. Together, they would remove over 44 hectares (110 acres) of Green Belt land and result in 1738 new homes, along with new roads, a secondary school, and a burial ground. **S13 alone is being asked to accommodate 1,738 of the 3,948 homes proposed across all 14 new Green Belt sites in Sheffield — a staggering 44% of the city's total allocation.**

Combined, these sites represent one of the largest Green Belt incursions in Sheffield's history, permanently erasing countryside that buffers the communities of Handsworth, Richmond, and Woodhouse. They would overwhelm local infrastructure that is already failing to meet demand, worsen long-standing traffic congestion on local roads, and place even more pressure on health services already stretched to breaking point.

The area is home to rich and diverse wildlife, including protected species such as bats, owls, newts, hedgehogs, badgers, and foxes, and forms part of a vital ecological corridor. The Bramley Lane site directly borders the ancient woodland of Shirtcliff, meaning development here would not only destroy important habitats but also damage irreplaceable natural heritage. No ecological mitigation has been clearly communicated. The loss of these green spaces would further erode biodiversity, fragment habitats, and eliminate natural carbon sinks essential for air quality and climate regulation.

The Bramley Lane site is also a known flood risk area, particularly along the existing greenfield boundaries. Paving over these fields would increase surface runoff and put downstream homes—especially on Beaver Hill Road, which floods annually—at even greater risk. Combined with already poor air quality from the Parkway (A630) and heavy local traffic, this development would worsen air pollution and harm public health, particularly for children and older residents.

Sheffield's Green and Open Space Strategy (2010–2030) commits to ensuring equitable access to green space for all residents, recognising its essential role in health, wellbeing, social inclusion, and environmental quality. In S13 – where families already face more disadvantage than the majority of areas to the west – we're now expected to give up two vital Green Belt sites, while the vast majority of the leafier suburbs remain protected

There is no equity in removing green space from those who already have the least access to it, while more affluent areas—despite being closer to the Peak District, having greater car ownership and mobility to reach green space—face far less development pressure. The south-east of Sheffield is being

stripped of its last remaining accessible countryside, leaving residents without meaningful access to nature on their doorstep.

The National Planning Policy Framework (NPPF 2023) calls for plans that are “justified,” “consistent with national policy,” and shaped by “proportionate and effective engagement.” What is happening in S13 clearly violates both the spirit and letter of those principles, deepening existing inequalities and worsening environmental and health outcomes in our community.

This process is flawed and exclusionary.

- Neither site was specifically included in the Regulation 18 or Regulation 19 consultations in 2023.
- Both were introduced only in early 2025, following Planning Inspectors’ recommendations.
- Some S13 residents became aware of this on 24 April 2025, when it was first announced via social media.
- The Council met on 30th April to approve these updates—less than a week later. To submit questions or petitions for that meeting, the deadline was Friday 25 April, giving us no realistic opportunity to engage, submit questions or petition.
- A final vote is now scheduled for 14 May, and the updated Regulation 19 consultation begins on 29 May, running for only six weeks.

To make matters worse, the 14 May meeting is classed as an “extraordinary” Council meeting, meaning S13 residents are not permitted to submit questions or petitions.

This change to the Local Plan should have triggered renewed public consultation. The last time Sheffield residents were consulted on the direction of the Local Plan was during the Regulation 18 stage in 2020, which did not include proposals to release Green Belt land in S13. The final draft consulted on under Regulation 19 in 2023 also excluded these sites. The sudden inclusion of two large Green Belt developments in early 2025— without any prior public engagement—**is a fundamental shift in policy**. According to the planning process, Regulation 18 is meant for early, open dialogue with communities, while Regulation 19 is for final feedback on a near-complete plan. **When major changes are introduced at such a late stage, best practice—and democratic fairness—suggests the Council should revert to Regulation 18 and re-consult the public before moving forward.** To proceed directly to Regulation 19 without this step undermines both the democratic spirit of public consultation and the requirements of the National Planning Policy Framework (NPPF 2023) for early and proportionate engagement.

You have effectively dropped a bombshell on our community—and silenced us.

This rushed timeline leaves no time for residents to make sense of the proposals, let alone respond. Critical documents are buried in multiple jargon-filled 500+ page reports, scattered online, and difficult to locate. Some referenced appendices are not even available. No printed information has been delivered. No public events have been held.

No effort has been made to contact vulnerable or elderly residents—many of whom still don’t even know this is happening.

This approach breaches both national policy and equality law. National Planning Policy Framework (NPPF 2023):

- Paragraph 3.16(c): Plans should be “*shaped by early, proportionate and effective engagement between plan-makers and communities.*”
- Paragraphs 140–145: Green Belt land should only be released in exceptional circumstances, and only when all other options have been thoroughly explored.
- Paragraph 35: A sound plan must be positively prepared, justified, effective, and consistent with national policy.

These tests are not met in relation to S13

S13 includes areas of high deprivation, limited digital access, lower literacy levels, and a high proportion of older and disabled residents. Under **Section 149 of the Equality Act 2010**, the Council has a legal obligation to ensure **fair access and inclusive engagement** through the Public Sector Equality Duty (PSED).

In essence, the PSED requires public bodies to:

- **Integrate equality considerations into all their activities – meaning equality must be factored into policy development, decision-making, and service delivery.**
- **Be proactive in addressing inequality – not merely avoiding discrimination, but actively working to advance equality and foster good community relations.**
- **Be transparent and accountable – clearly demonstrating how they are meeting their equality obligations and being able to justify decisions.**

The Council’s **rushed & hushed consultation process** fails to meet these duties and risks **excluding the very people most impacted** by the proposals. Without deliberate efforts to engage and include disadvantaged groups, particularly those with limited digital access or additional support needs, the process falls short of the legal standards required.

We are therefore requesting:

1. That the Council delays the 14 May vote to allow time for proper community engagement in S13.

2. That the Council contacts the Government Planning Inspectors to request an extension—on the basis of democratic fairness—so that local communities affected by newly identified Green Belt allocations are given the opportunity to engage through a full Regulation 18 consultation process.

3. That the Council provides:

- Plain-language summaries of both proposals, including the reasoning behind the selection of S13 Green Belt sites.

- An in-person public consultation event in Handsworth with opportunities to ask questions directly to planning officers, prior to the Consultation 19 period.

- Direct written communication (letters or flyers) to affected households, including those who are not online.

This is not a minor policy tweak. These proposals would permanently reshape our local landscape, strip our community of its last accessible green space, and burden future generations with the consequences. S13 is a predominantly working-class community. We are not planning consultants,

barristers, or specialists in land use policy. Yet we are being expected to engage meaningfully with an extremely complex planning process— navigating hundreds of technical documents—in a matter of weeks, with no prior notice or support. This is simply not a reasonable or fair expectation.

We are not asking for special treatment. We are simply asking for a fair, transparent, and inclusive process—the same opportunity that other communities across the UK have had, with time to understand proposals and meaningfully engage since the Regulation 18 stage.

Please stand with the residents of S13. **Pause this process. Let our voices be heard.** This community has been a Labour stronghold for over 90 years—generation after generation placing its trust in Labour councillors and MPs to represent our values and protect our interests. Right now, that loyalty is being taken for granted. The very people we have elected to stand up for us are turning their backs and shutting down our voices. We trust that, as elected representatives, you will recognise the seriousness of our concerns and the urgency of this matter. We look forward to receiving your public response and seeing how you intend to represent and protect the voices of the communities you serve.

[2] Complaint to council:

(I haven't included the full complaint as it discloses personal matters I would prefer to keep private for this public objection, however this is what I requested)

"I would like to know whether an Equality Impact Assessment (EIA) was carried out for this consultation event.

If so, please provide a copy.

If not, please explain how the Council claims to have fulfilled its Public Sector Equality Duty in the absence of one.

I am requesting that Sheffield City Council take the following actions:

1. Acknowledge that the consultation event was not accessible, and that the Council failed to provide reasonable adjustments when directly requested.
2. Offer alternative and accessible methods of engagement, such as:
 - A scheduled one-to-one meeting (in person or online)
 - A written Q&A process with officer responses
 - A follow-up reduced-stimulation session
 - An online Q&A event where people can be muted and unmuted to ask questions
3. Improve accessibility and staff support at future consultations, including:
 - Quiet-hour sessions or small group formats
 - Clear structure and turn-taking systems
 - Staff trained to respond to real-time access requests
 - Clear accessibility guidance and venue layout shared in advance
 - Duty of care planning to prevent staff overwhelm and public distress

I would appreciate a full and timely written response to this complaint. If the Council does not respond — or fails to meaningfully address the issues raised — I will escalate this matter to the Local Government and Social Care Ombudsman.

I sincerely hope this won't be necessary. But I do believe disabled and neurodivergent residents deserve better than this. We deserve to take part in local democracy and public consultation processes without distress, confusion, or harm — and with the adjustments we are legally entitled to.

Many thanks,

Sadie”

[3] [Sheffield houses: 14 green belt sites earmarked for thousands of homes and businesses](#)
[4]

 SheffieldPlan 23 Jun
to me ▾

😊 ↩ ...

Sadie

I'm very sorry you couldn't open the link. I have attached the PDF document instead.

The discussions held as part of updating the Infrastructure Delivery Plan (IDP) formed part of day-to-day work on building the evidence base for the Plan, as with all similar work, and wouldn't be expected to be a public discussion.

The outcome of discussions with the ICB is included in the document attached. The conversation was between the authors of the report and the ICB and we do not hold notes of that meeting.

...

Best wishes,



Email from Planning Team on 23/6/2025

[5]

equalitiesandengage... 15 May
to me, equalitiesandengagement

Dear Miss Charlton

Apologies for the delay. Please see attached a copy of the draft Local Plan – EIA as requested.

Kind regards

Equalities and Engagement Team
Strategy and Communication
Sheffield City Council
Town Hall, Pinstone Street, Sheffield
Tel: 0114 4743885
Email: equalitiesandengagement@sheffield.gov.uk

First, due to be discussed at the full council meeting tomorrow (14th May) I can't seem to find this online, and as a disabled resident myself I would like to review this myself. Best wishes, Sadie

How would you like us to contact you?: By email

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Draft Local Plan - integrated im...

PDF



This is an integrated impact report, not the Updated EIA

[6] FOI REQUESTS

I am writing to make a request under the Freedom of Information Act 2000 regarding the involvement of Sheffield Integrated Care Board (ICB) in the evidence base for Sheffield City Council's updated Infrastructure Delivery Plan (May 2025), specifically relating to:

- **Site SES30** – Land between Bramley Lane and Beaver Hill Road, S13
- **Site SES29** – Handsworth Hall Farm, Land at Finchwell Road, S13

These sites are proposed for development in the Sheffield Local Plan and are referenced in the Infrastructure Delivery Plan Addendum (May 2025), which attributes healthcare infrastructure recommendations (e.g. additional GP consultation rooms) to discussions with the ICB.

Please provide the following information:

1. **Any and all correspondence** (emails, letters, meeting requests or summaries) between Sheffield ICB and either:
 - o Arup (authors of the Infrastructure Delivery Plan), and/or
 - o Sheffield City Council regarding healthcare provision, capacity, or infrastructure needs for SES29, SES30, or any developments proposed in the Handsworth/Southeast Sheffield area.

2. **Any documents or reports produced by or shared with Sheffield ICB** that assess the primary care impact of the proposed developments at SES29 and SES30.

3. **Any meeting notes, minutes, or briefing materials** held by Sheffield ICB that discuss the capacity of GP practices or healthcare infrastructure in the vicinity of SES29 and SES30.

4. The **methodology and/or assumptions used to calculate the estimated patient yield** (e.g. 2.3 patients per dwelling) and the resulting need for "2-3 additional consultation rooms" per site. This includes any reference documents or internal models used to derive these estimates.

5. Any information held regarding **potential mitigation plans, developer contributions, or known capacity constraints** related to serving the population growth from these developments.

I look forward to your response within the statutory 20 working days.

Thank you so much in advance,

Best wishes,

Sadie

FOI submitted to Sheffield ICB 23.6.205

From: Sarah [REDACTED]

Sent: 26 June 2025 10:58

To: FOI <FOI@sheffield.gov.uk>

Subject: FOI Request – Local Plan Evidence Base and External Consultancy Communications

Dear FOI Officer,

Under the Freedom of Information Act 2000, I am requesting the following information relating to the Sheffield Local Plan (as submitted in 2024 and updated in 2025). I am interested in the update to the evidence base reports that were commissioned during the period January 2025 to this current date (26/6/2025)

1. Commissioning of External Consultants

- A full list of all external consultants, consultancy firms, or third-party organisations commissioned by Sheffield City Council to produce or contribute to reports forming part of the Local Plan updated evidence base (including, but not limited to, the Sustainability Appraisal, Green Belt Review, Transport Assessment, Viability Study, Infrastructure Delivery Plan, Housing Needs Assessment, Infrastructure Assessment, Impact Assessment, Sheffield Plan - Appropriate Assessment and Landscape Assessments).
- For each, please provide:

- The date of commissioning (including the date they were contacted to update the report if applicable)
- The value/cost of the contract
- The scope of the commission (e.g., terms of reference or project brief)

2. Communications and Scrutiny

- Any emails between council officers and external consultants concerning: amendment requests from sheffield city council to the report
 -
- Records of any formal reviews, approvals, or internal scrutiny of consultant-produced evidence before publication or submission.

I would particularly like to see:

Email correspondence between Sheffield City Council and CuraTerra on May 29th regarding the Appropriate Assessment

3. Member Involvement

- Any evidence showing that elected members (e.g., Cabinet Members, Planning Committee, or Local Plan Steering Group) were presented with, discussed, or signed off on these

FOI submitted to Sheffield Council 26.6.2025