



CONSULTATION PROCESS EXPLAINED

S13 Sunday Drop In 8/6/25

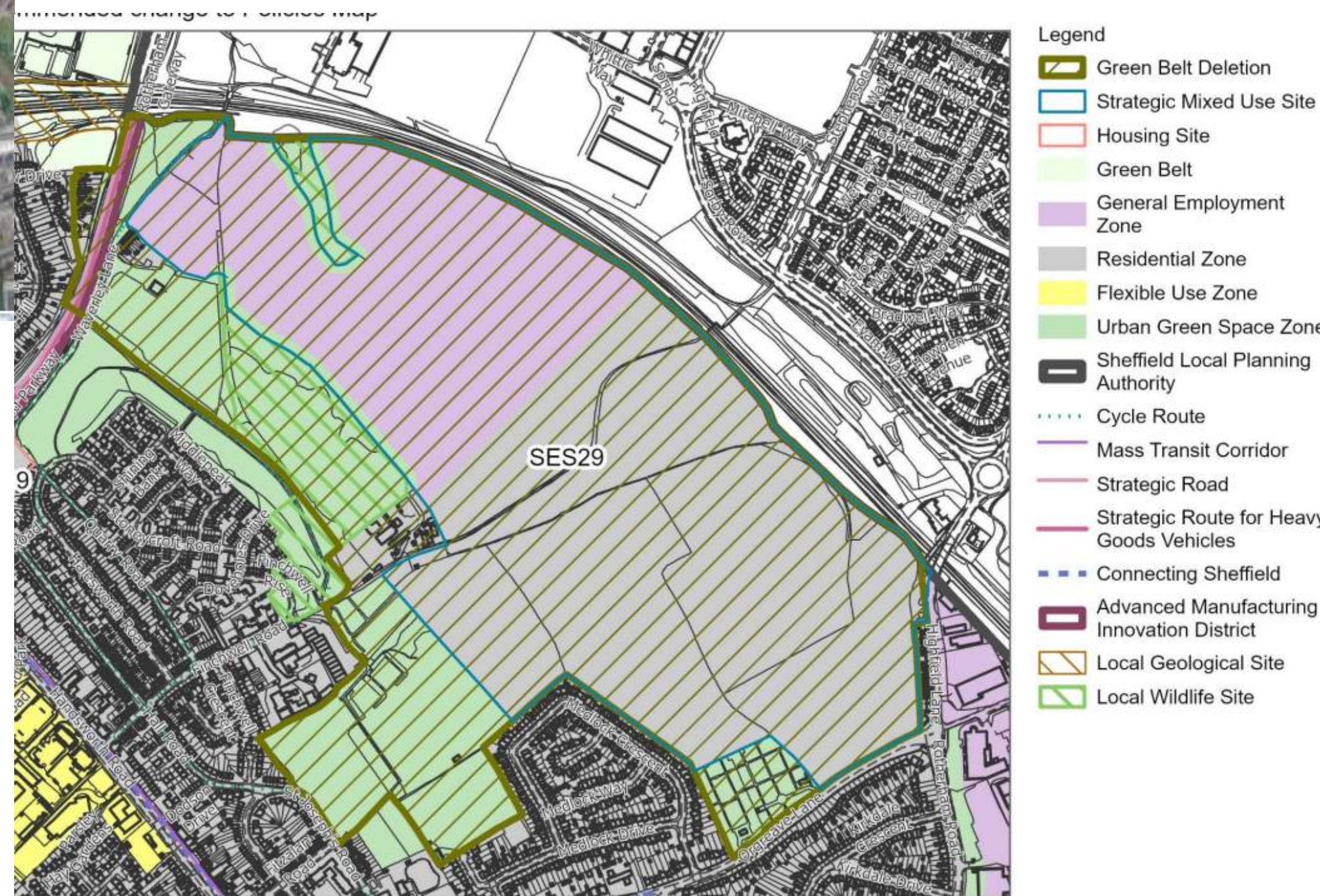


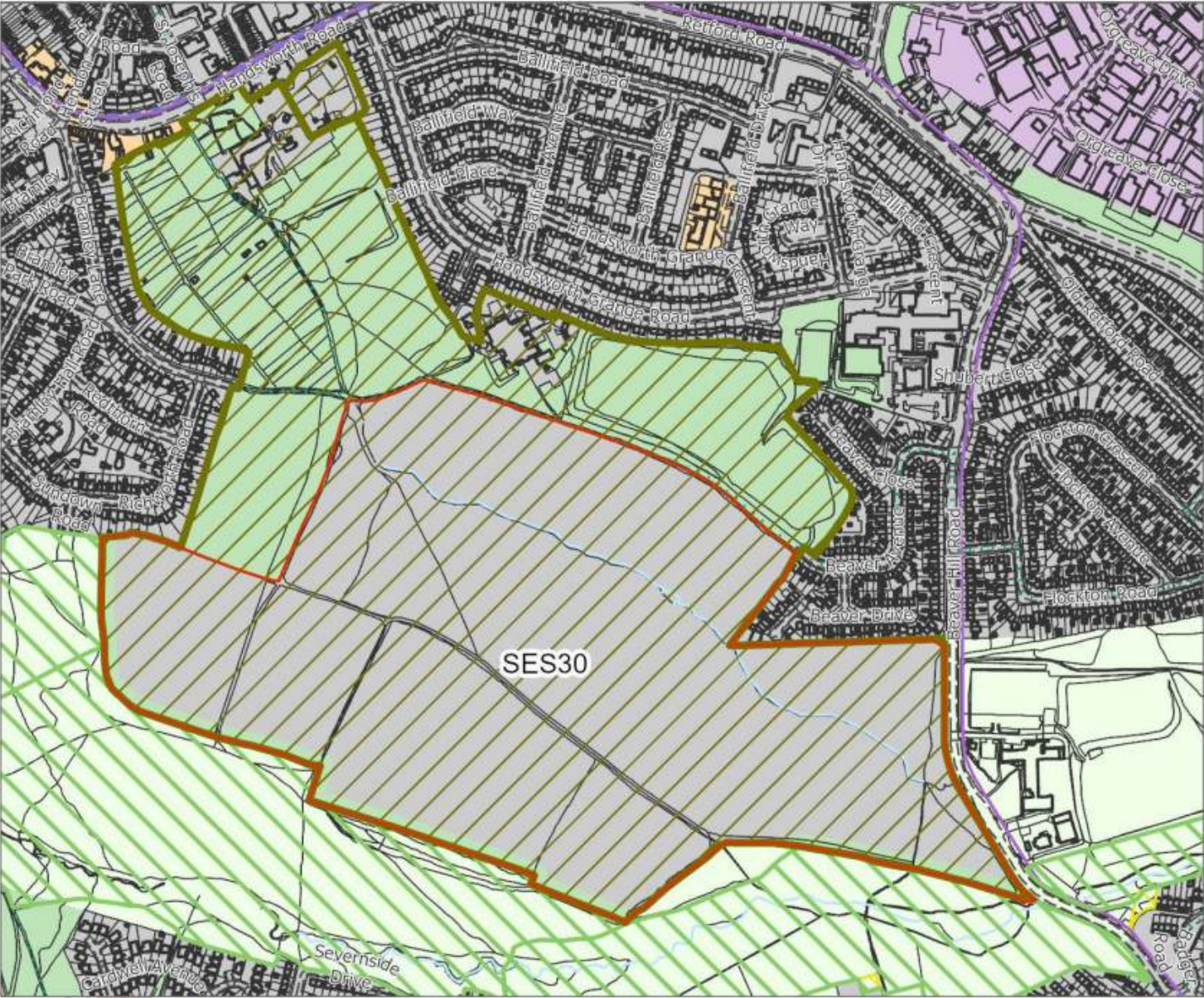
HANDSWORTH HALL FARM, LAND AT FINCHWELL ROAD, S13 9AS

SITE: SES29

56.92 Hectares

870 Homes
Net employment (Class B2, B8 & E(g)(iii)) area: 20.00 hectares





LAND BETWEEN BRAMLEY LANE AND BEAVER HILL ROAD, S13 7JH SITE: SES30

36.55 Hectares
868 Homes
Secondary School
Burial Ground



- 2020 – First public consultation under **Regulation 18** (early stage). It showed people preferred building on brownfield land rather than on Green Belt.
- Early 2023 – The Draft Sheffield Plan was published for the **Regulation 19 consultation** (final draft before submission). It proposed around 34,500 new homes and over 180 hectares of land for jobs, with 89% of homes and nearly all employment land on brownfield sites.
- Autumn 2023 – The Plan was submitted to the Government and began formal examination by Planning Inspectors.
- 2024 – Public hearings were held so Inspectors could examine the Plan in detail and hear from community groups and developers.
- February 2025 – Government Inspectors told the Council they needed to find more land for housing and jobs.
- April 2025 – In response, the Council proposed to release 14 Green Belt sites, making up 3.6% of Sheffield's Green Belt. Alarming, **44%** of that total Green Belt release is in the S13 area alone.
- May 29th 2025 - **Regulation 19 Public Consultation** begins again, despite there being a SIGNIFICANT change to the plan. Many residents are still UNAWARE of these proposals.

BACKGROUND



SAVE  **S13**
GREENBELT!

REGULATION 18

your chance to say “What should we do?” —
shaping strategy, locations, and priorities.

REGULATION 19

is your chance to say “Have they done it properly?”
— focusing on legal soundness and coherence with
national policy.

Feature	Regulation 18 (Emerging Options)	Regulation 19 (Publication Draft)
Stage	Early draft development	Final draft before submission
Focus	Gathering ideas and shaping policy scope	Testing legal compliance and soundness
Type of Input	Open-ended feedback and suggestions	Formal representations on legal/soundness issues
Consultation Window	At least 6 weeks	At least 6 weeks
Council Activity	Adjusting proposals based on feedback	Collating representations for Examination
Relevant NPPF Principle	“Early, proportionate and effective engagement”	Ensuring Plan is “sound and legally compliant”
Outcome	Update to Draft Plan	Submission with representations for Examination

SHOULD SCC HAVE GONE BACK TO REG 18 CONSULTATION?

The National Planning Policy Framework (2023) states:

Public consultation is defined not just as informing people but as actively involving them in shaping planning policies, proposals, and decisions.

- Paragraph 16(c): Plans should "be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees."
- This means engagement should happen before decisions are made—not after a preferred plan is drafted.
- Engagement should be proportionate to the scale and potential impact of the proposals

TIME LINE – WHAT TO EXPECT

you can find the councils timeline here: https://017f5bf8-ff4d-415b-be58-79dae2836c33.usrfiles.com/ugd/017f5b_f183d0b2b3714043aea61201b74fe8e6.pdf

- Regulation 18 – Early engagement and options consultation (This happened in 2020, before Greenbelt release was proposed)
- Regulation 19 – Publication
- of the draft Local Plan for formal representations (This is happening now!)
- Submission to Planning Inspectorate (Summer 2025)
- Examination in Public (Autumn 2025)
- Adoption (July 2026)
- Potential Legal action (last chance!)

OBJECTING TO THE PLAN



1. Is it Legally Compliant?



This means: Did the Council follow the correct procedures and legal requirements?



2. Is it Sound?



This means: Is the plan well-evidenced, justified, and aligned with national planning policy?



LEGALLY COMPLIANT

✓ 1. Was the Plan in the Local Development Scheme (LDS)?

The Plan must be listed in the Council's LDS (a publicly available timetable).

Check: Was the Local Plan (and any changes like new Green Belt sites) included in the LDS and published at the right time?

✓ 2. Did the Council follow its Statement of Community Involvement (SCI)?

- The SCI sets out how the public should be involved.
- Look for failures like:
 - Only using online methods, excluding elderly or digitally excluded residents
 - No direct notifications (e.g., letters, leaflets, community drop-ins)
 - Changes announced without adequate time or promotion

✓ 3. Was there a Sustainability Appraisal?

- A full Sustainability Appraisal (SA) must accompany the Plan and assess:
 - Environmental impacts (e.g., Green Belt loss, wildlife)
 - Social impacts (e.g., local services, health, equity)
 - Economic impacts (e.g., jobs, transport, viability)
- Check: Was an up-to-date and transparent SA published alongside new site proposals?

✓ 4. Were legal procedures followed?

The Plan must comply with:

- The Planning and Compulsory Purchase Act 2004
- The Town and Country Planning (Local Planning) Regulations 2012, including:
 - Regulation 18: Early public consultation on what the Plan should contain
 - Regulation 19: Formal consultation on the final draft Plan

Common issues:

- Major new sites added without reconsulting the public (e.g., Green Belt sites introduced late)
- Insufficient consultation periods or lack of publicity
- Not publishing required documents (e.g., site assessments, consultation summaries)


✓ 5. Was everyone fairly able to take part?

- The council must consult in a way that's:
 - Inclusive (reaching all communities)
 - Accessible (different formats, languages, in-person options)
- Consider: Were vulnerable or marginalised groups excluded from the process




LEGAL COMPLIANCE: KEY QUESTIONS FROM SHEFFIELD'S SCI

WAS I (OR OTHERS IN MY COMMUNITY) DIRECTLY INFORMED ABOUT THIS CHANGE TO THE PLAN?

- The SCI commits to “informing people early and clearly” when decisions are being made (Section 2.6).
-  Example objection:
- “I was not made aware of the inclusion of site SES30 until I saw a news article on 24 April 2025. No direct communication or local publicity was issued to our community beforehand.”


WERE CONSULTATION MATERIALS MADE ACCESSIBLE FOR ALL, INCLUDING THOSE WITHOUT INTERNET ACCESS?

- The SCI states that engagement should be “inclusive and accessible to all sections of the community”, including “hard to reach groups” (Section 2.5 and 2.8).
-  Example objection:
 - “Consultation was limited to online platforms, excluding elderly and digitally excluded residents in S13. No paper notices, letters, or in-person engagement were provided. Notification of public consultation was made online for a 2 hour drop in session, despite this being the area with largest impact. Another consultation was later added but I was not made aware of this update to the website and therefore missed it”




LEGAL COMPLIANCE: KEY QUESTIONS FROM SHEFFIELD'S SCI

DID THE COUNCIL USE A RANGE OF METHODS TO REACH RESIDENTS, NOT JUST DIGITAL ONES?

- The SCI promises a mix of methods, including community venues, exhibitions, and print (Section 3.8, 4.3, and Appendix 2).
-  Example objection:
- “The Council did not use community spaces, leaflets, or local meetings to inform or involve the public, contrary to its commitment in the SCI to use varied methods of engagement.”


WERE SIGNIFICANT CHANGES (LIKE ADDING GREEN BELT SITES) RECONSULTED ON APPROPRIATELY?

- The SCI says that “where significant changes are made, additional consultation may be required” (Section 4.3).
-  Example objection:
- “The late-stage inclusion of SES30 and SES29 constitutes a significant change to the spatial strategy. These sites were not in previous consultations and should have triggered new, targeted engagement.”




LEGAL COMPLIANCE: KEY QUESTIONS FROM SHEFFIELD'S SCI

DID I HAVE ENOUGH TIME AND INFORMATION TO MAKE AN INFORMED RESPONSE?

- The SCI outlines that the Council will give people clear, timely information and sufficient time to respond (Sections 3.6–3.8).
-  Example objection:
- “The announcement of new Green Belt sites came just 20 days before the vote to approve them. This did not allow enough time for meaningful public understanding or feedback.”

DID THE COUNCIL RESPOND TO PUBLIC INPUT AS PROMISED?

- The SCI states they will “listen to the views expressed and provide feedback” (Section 2.6 and 4.2).
-  Example objection:
- “Questions submitted by residents ahead of the 14 May meeting were not answered, despite the Council committing to written responses. This undermines public trust and breaches its SCI.”

IS THE PLAN SOUND?

📍 1. Positively Prepared: Does it meet local needs?

- Has the Council shown evidence that all brownfield options have been exhausted, justifying Green Belt use?
 - Council statement: “all available brownfield sites have already been allocated”
- Are the proposed sites needed to meet housing targets set by the Inspectors?
 - Inspectors required an extra ~3,259 homes

✓ Ask: “What evidence supports the claim that no alternative non-Green Belt sites exist?”

🔍 2. Justified: Is the approach the most appropriate?

- Has the Council published a detailed Selection of Sites for Green Belt Release Topic Paper?
 - Available online as supporting evidence
- Is there a fully updated Sustainability / Integrated Impact Assessment including smaller Green Belt sites?
 - Updated IIA and Addendum are part of the consultation materials

✓ Ask: “Does the evidence show that these particular Green Belt parcels are the best and least damaging choice?”

⚙️ 3. Effective: Is the plan deliverable?

- Does the Council include an Infrastructure Delivery Plan update, showing how new sites will be serviced?
 - Addenda on transport, flood risk, and infrastructure are provided (but these have only just been uploaded so were not available for the FULL 6 weeks consultation period)
- Are there “Golden Rules” for Green Belt development — e.g., infrastructure, affordable housing, biodiversity net gain?
 - Council mentions enhanced standards and requirements

✓ Ask: “Is there clear, funded planning to deliver homes, infrastructure and environmental protections?”

🌱 4. Consistent with National Policy: Does it follow the NPPF?

- Green Belt should only be released in exceptional circumstances — are these clearly stated?
 - Council states exceptional need due to Inspector request
- Does the Plan enforce NPPF biodiversity net gain and affordable housing quotas on former Green Belt?
 - Policies set targets: 30%–50% affordable housing and biodiversity enhancement

✓ Ask: “Does the Plan clearly show exceptional circumstances and follow NPPF’s environmental protections?”

KEY ARGUMENTS FOR PUBLIC ENGAGEMENT: LEGAL

Key Argument:

Residents were not given fair, accessible, or reasonable opportunity to examine the evidence base and respond meaningfully to the consultation, especially regarding the newly added Green Belt sites SES29 and SES30.

Supporting Policies:

Under the Statement of Community Involvement (SCI), the Council must provide clear, timely, and accessible information in formats the public can reasonably understand.

The Town and Country Planning (Local Planning) (England) Regulations 2012 require that relevant documents must be made available and intelligible during consultation.

Equality Duty under the Equality Act 2010 also means processes must not disadvantage digitally excluded or less literate groups.

Example Objection Statement:

“The evidence base for the new site allocations is buried in thousands of pages of complex and technical reports. I was only given 5 weeks to engage with a process requiring professional-level analysis. This severely limits the ability of non-expert, time-poor or digitally excluded residents to engage meaningfully. As such, the process does not meet the standards of accessibility, transparency or fairness set out in the Council’s SCI, and may breach legal requirements around inclusive consultation.”

KEY ARGUMENTS FOR PUBLIC ENGAGEMENT: SOUND

Key Argument:

The Plan is not justified, because it fails to clearly present and explain why SES29 and SES30 are the most appropriate sites — especially to a general public audience.

- If residents can't understand the evidence, they can't effectively comment — undermining the Plan's legitimacy.**
- If the Council cannot clearly communicate why these sites were chosen, the selection process may lack transparency or robustness.**

Example Objection Statement:

““The decision to allocate Green Belt sites SES29 and SES30 is not presented in a transparent or accessible way. Key justifications are buried in dense technical documents, making it impossible for most members of the public to understand or scrutinise. This undermines the claim that the Plan is ‘justified’ and demonstrates a lack of accountability in the decision-making process.””

EVIDENCE: HOW YOU CAN HELP

- 1. Emails Sent to the Council (and Replies)
 - Copies of emails sent to sheffieldplan@sheffield.gov.uk or councillors asking:
 - For help accessing documents
 - For extensions to the consultation period
 - For clear summaries of new sites or their impact
 - Responses (or lack of response) from:
 - Planning officers
 - Local councillors
 - Council departments or support staff
- ✓ Useful for proving the council failed to meet duties to respond, inform, or provide support.

EVIDENCE: EXAMPLE – NO REPLY!!

Hello,

Wondering if you could clarify some confusion for me.

I have been trying to make sense of all the documents available on Sheffield council website which were referred to in the May Local Plan (Proposed additional site allocations).

Within this document it references a number of additional supporting documents to support why the plan is the plan. It's absolutely crazy that the council expect members of the general public who are not at all tech savvy or from a background that can easily digest these reports filled with 1000s of pages of jargon, trying to find out pieces of information that are related directly to our greenbelts. Where is the simplified information that addresses each individual site and explains jargon free, why this site has been chosen and then a link to the corresponding evidence? Surely that's the most transparent and inclusive way for the communities you serve.

I have been trying to understand this report for a while now and referencing reports for a number of weeks since I found out. Then suddenly, without any notification - a bunch of NEW documents appear of the council website.

Can you confirm what is a new update and what date this was uploaded so that I can make sure I'm reading the most current information and disregard others?

Thank you so much,
Sadie

Hello,

Sorry, I'm looking for the equality impact assessment that specifically highlights the assessment and considerations of Greenbelt released sites for disabled residents?

Is that included within this report? I have ADHD, dyslexia and dyspraxia so I really would appreciate an accessible document or your help in referencing the page numbers within because I find long documents in this style with too overwhelming to navigate. Sorry, I'm trying to understand this whole process and there hasn't been any accessible information offered. I'm being expected to read reports that are hundreds of pages long, filled with jargon and technical language which is a barrier for me to engage with the upcoming consultation process.

Do you have any accessible versions of the plans/ reports? There's so many and it's practically impossible for me to take all this information in. The council hasn't provided any accessible information and yet I'm expected to meaningfully engage with the consultation process? How?

Thank you,
Sadie

EVIDENCE: HOW YOU CAN HELP

- 2. Records of Requests for Accessible Formats
 - Emails or records of requests for:
 - Paper copies of consultation documents
 - Easy-read versions, plain English summaries, or large print versions
 - Printed maps or summaries of Green Belt proposals
 - Any failure to respond, delay, or refusal by the Council
- ✓ Shows the Council may have breached its SCI and Equality Act duties for accessibility and inclusion.

EVIDENCE: HOW YOU CAN HELP



3. Screenshots or Printouts of Council Communications

- Website notices or emails announcing the consultation
- Screenshots showing:
 - Lack of visibility on key pages
 - Missing or broken links
 - Excessive complexity or inaccessible formats

✓ Helps demonstrate that the information was not clearly presented or reasonably accessible to the public.

EVIDENCE: HOW YOU CAN HELP

4. Timeline of Events / First Awareness

- Personal records from residents:

- When they first found out about SES29/SES30 (e.g., April 24 Star article)
- How they found out (e.g., social media, word of mouth, not the Council)
- What information they were able to access

✓ Builds a timeline of public exclusion or late-stage awareness.

EVIDENCE: HOW YOU CAN HELP

5. Comments from Vulnerable or Excluded Groups

- Testimonies from:

- Elderly or digitally excluded residents
- People with low literacy or learning disabilities
- Busy parents, carers, or others with limited time

- Statements like:

- “I didn’t know this consultation was happening.”
- “I couldn’t understand the documents.”
- “I didn’t know where to find my site.”

✓ Adds weight to the argument that the process was not inclusive, as required by law.

EVIDENCE: HOW YOU CAN HELP

- 6. Council Meeting Records or Broken Promises
 - Documentation of the May 14 meeting process:
 - Emails showing late change in rules about accepting public questions
 - Evidence that the Council promised written responses but didn't deliver
 - Records of petitions or questions submitted and how they were (or weren't) acknowledged
- ✓ Supports the argument that the Council failed to uphold procedural fairness and transparency.

EVIDENCE: HOW YOU CAN HELP

● 7. Copies of Leaflets / Letters (or Lack Thereof)

- Evidence showing:
- No letters or leaflets were delivered to affected households
- No physical signage or community events were held
- If possible, compare with areas that did receive targeted consultation in previous years

✓ Strengthens the case that S13 residents were disproportionately excluded.

REMEMBER!

- It's not the NUMBER of objections recieved that matters, its the QUALITY
- You are free to make your own objections based on your OWN views
- If you tick to 'attend hearings' in the Autumn, you'll need to be confident in presenting your facts publicly based on evidence.
- We have until July 11th, there are no points for early submission!

Join the public consultation events - it's your chance to ask your questions to the planners!



THANK YOU

What would be helpful for next time?