



# S13 KEY FACTS REFERENCE SHEET

*Essential Facts with Citations for Your Objection.*

---



## HOW TO USE THIS REFERENCE SHEET

*This document contains three lists of facts to use in your objection:*

- *List A Legal/Procedural Arguments Backed by S13 Evidence*
- *List B: Greenbelt Policy Arguments with S13 Facts*
- *List C: Local/Practical Arguments Specific to S13*

*The final two pages provide evidence to back up these lists.*

✓ Remember the most important thing is **your experience and opinion**, these facts are here as an aid - **feel free to use the specific facts** that relate to your concerns

✓ **Include the full citation** when using any fact

✓ **Combine facts from different lists** for stronger arguments

✓ **Use statistics** to make your objection evidence-based

**This reference sheet provides the ammunition to make your S13 objection factual, specific, and robust!** 🌳

---

## LIST A - Legal/Procedural Arguments Backed by S13 Evidence

- **S13 bears a disproportionate 44% of all Green Belt housing allocations across Sheffield despite representing only a fraction of Sheffield's total area.** *[Sheffield Plan: Proposed Additional Site Allocations (May 2025)]*
  - **The proposed development involves 1,738 new homes concentrated across two major sites - SES29 (Handsworth Hall Farm) with 770 homes and SES30 (Bramley Lane/Beaver Hill Road) with 868 homes.** *[Sheffield Plan: Proposed Additional Site Allocations (May 2025)]*
  - **The Planning Inspectors requested 3,539 additional homes, but the Council has offered sites for 3,948 homes - nearly 400 more than required.** *[Sheffield Plan Inspectors' Letter (February 6, 2025)]*
  - **S13 residents weren't notified of these proposals until April 24th, 2025, with no Regulation 18 consultation specifically on Green Belt release.** *[Sheffield Statement of Community Involvement (2020)]*
  - **Site SES30 was only added in April 2025, well after earlier consultation stages had already closed.** This gives the “illusion” of community involvement without the reality. The SCI states councils should involve communities **“by consulting at the earliest opportunity”**. *[Sheffield Statement of Community Involvement (2020)]*
  - **Neither S13 or Sheffield residents received a single letter, or leaflet from the council informing them of this plan. Leaving countless thousands of residents who are not online “in the dark”.** Despite their own Statement of Community Involvement policies requiring them to implement “early involvement” *[Sheffield Statement of Community Involvement (2020)]*
  - **The S13 sites score between 13-14 points out of 20 on the Green Belt purpose assessment, demonstrating moderate to strong Green Belt function.** *[Green Belt Review Update (November 2024)]*
  - **Only 5 sites across the entire city score below 10 on the Green Belt purpose assessment, and none of these are in S13.** *[Sheffield Plan Green Belt Review 2024]*
  - **The exceptional circumstances test requires demonstration for each individual site, not as a blanket justification, which has not been properly applied to S13.** *[Green Belt Review Update (November 2024)]*
  - **The Council has consistently underperformed on brownfield delivery targets, completing only 65% of planned brownfield development between 2019-2024.** *[Sheffield City Council Housing Land Audit (2024)]*
-

## LIST B - Greenbelt Policy Arguments with S13 Facts

- **Between 2022-2024, 89% of homes were delivered on brownfield sites in Sheffield, proving this approach works and should be prioritized over Green Belt release.** *[Housing Fund Economic Land Availability Assessment (December 2024)]*
  - **Sheffield City Council Housing Land Audit 2024 identified 96 brownfield sites with potential for 7,840 homes that remain undeveloped.** *[Sheffield City Council Housing Land Audit (2024)]*
  - **Sheffield has approximately 95 hectares of vacant previously developed land according to national data.** *[Campaign to Protect Rural England, State of Brownfield Report (2024)]*
  - **S13's Green Belt maintains 14 identified wildlife corridors that would be severed by the proposed development.** *[Sheffield Wildlife Trust, Ecological Network Report (2021)]*
  - **Replacing mature hedgerows and woodland habitats with newly planted alternatives results in a 35-year time lag before equivalent ecological function is restored.** *[Sheffield Biodiversity Net Gain Assessment (2024)]*
  - **The Council has failed to examine fully all other reasonable options for meeting development needs as required by NPPF paragraph 137.** *[Comparison of brownfield capacity vs Green Belt proposals]*
-

## LIST C - Local/Practical Arguments Specific to S13

- **Only 9% of Handsworth residents can access their preferred healthcare professional compared to the 40% national average.** *[NHS Sheffield GP Patient Survey (2024)]*
  - **Both Athelstan and Ballifield primary schools appear on the Council's 2025-2026 oversubscribed schools list despite Council claims of sufficient capacity.** *[Sheffield City Council, Oversubscribed Schools List (2025-2026)]*
  - **The Transport Assessment projects a 37% increase in journey times along Handsworth Road by 2030 even before these developments.** *[Transport Assessment Update, Sheffield Plan (April 2025)]*
  - **Air quality monitoring in 2023 showed that S13 already exceeds national guidelines for NO2 pollution by 15% at peak times.** *[Sheffield Air Quality Annual Status Report (2023)]*
  - **Pothole damage claims data shows a 65% increase in claims in 2023/24, indicating existing infrastructure maintenance challenges before any new development.** *[Pothole Vehicle Damage Claims and Compensation Data (2012-2025)]*
  - **The already congested junctions at A630 Sheffield Parkway/B6200 Handsworth Road and Retford Road/Beaver Hill Road would see traffic increases described as "severe" by the Council's own consultants.** *[Transport Assessment Update, Sheffield Plan (April 2025)]*
  - **S13's diverse communities include 34% of residents from ethnic minority backgrounds, many of whom rely heavily on local green spaces for recreation and cultural activities.** *[Sheffield Plan Equalities Impact Assessment (2025)]*
  - **The Strategic Flood Risk Assessment identifies parts of both SES29 and SES30 sites as high flood risk areas, with SES30 showing significant surface water flooding issues.** *[Sheffield Strategic Flood Risk Assessment (2024)]*
  - **Communities with limited access to green space show 18% higher stress levels and 25% higher rates of depression according to Sheffield's own strategy documents.** *[Sheffield Health and Wellbeing Strategy (2023-2028)]*
  - **S13 has already absorbed significant recent development including the Waverley development (4,000 homes), Gateway Estate, Pickard Estate, and Fitzalan Development.** *[Public submissions to Sheffield Plan consultation (May 2025)]*
-

## QUICK STATISTICS SUMMARY

Category	Key Statistic	Source
<b>Disproportionate Burden</b>	44% of Sheffield's Green Belt housing in S13	Sheffield Plan Allocations (May 2025)
<b>Over-Provision</b>	400 homes more than Inspectors requested	Inspectors' Letter (Feb 2025)
<b>Green Belt Function</b>	S13 sites score 13-14/20 (moderate-strong)	Green Belt Review (Nov 2024)
<b>Healthcare Crisis</b>	9% GP access vs 40% national average	NHS Patient Survey (2024)
<b>Air Quality</b>	15% above national NO2 pollution limits	Air Quality Report (2023)
<b>Traffic Impact</b>	37% journey time increase by 2030	Transport Assessment (April 2025)
<b>Infrastructure Strain</b>	65% increase in pothole claims 2023/24	Damage Claims Data (2025)
<b>Brownfield Alternative</b>	96 sites, 7,840 home potential unused	Housing Land Audit (2024)

---

# Evidence Checklist for Objections: Site SES30 (Green Belt, S13)



## Evidence Checklist for Objections – Site SES30 (Green Belt, S13)

This checklist helps residents support their objections with practical evidence. You do not need to be an expert – use your own experiences, photos, and simple observations to strengthen your submission.

### Key Point to mention

**- State how you use the Greenbelt land now!**

### 1. Consultation and Accessibility

- State if you received no letter, email, or leaflet about Site SES30.
- Describe when and how you first found out about the site – was it late? Was it word of mouth?
- Take a screenshot showing how difficult it is to find SES30 information on the Local Plan website.
- Mention if you don't use the internet or had trouble finding documents.
- Provide screenshots or descriptions of inaccessible document formats (e.g. 1000+ page PDFs).
- Note whether your local library, school, or noticeboard displayed any materials.
- Refer to the 'Proposed Additional Site Allocations' paper as evidence that SES30 was added late (April 2025).

### 2. Traffic and Congestion (Beaver Hill Road)

- Take photos of daily traffic or school-time congestion.
- Submit written statements about how long it takes to travel during peak times.
- Mention any personal experience of near misses, traffic hazards, or delays.
- Reference the Transport Assessments if you've read them and found concerns not addressed.

### 3. GP Access and Health Services

- Include screenshots of your GP surgery's appointment booking page showing no available slots.
- Describe your recent experience trying to get an appointment.
- If you've written to or heard back from NHS or your surgery, you can include the email or reply.
- State that the plan gives no guarantee of a new health facility – just vague 'expansion' plans.

## **S13 Key Facts and Evidence reference sheet**

### **4. Flood Risk**

- Take photos or videos of local flooding or standing water near SES30 during/after rain.
- Refer to the Level 2 SFRA for SES30, which shows 9.9% of the site would be used for flood mitigation.
- Explain if you've seen blocked drains, overflowing gutters, or water collecting on roads.

### **5. Green Space and Wildlife**

- Take photos of local wildlife (e.g. bats, birds, foxes) on or near the site.
- Describe how you use the green space: walking, dog walking, mental health, family time.
- If you have a fitness tracker showing your walking routes through the green space, include a screenshot.

### **6. Green Belt Fairness and Distribution**

- Quote the Council's own documents showing that 44% of the total Green Belt loss is in east Sheffield.
- Use a map or summary to compare how west Sheffield hasn't lost any Green Belt.
- Express how this imbalance feels unfair or disproportionate based on your local knowledge.

### **7. Overlooking Waverley and Local Housing Context**

- Mention that Waverley (in Rotherham) is a large development nearby that hasn't been factored in.
- Suggest that housing need could be met through regional cooperation, rather than Green Belt loss in S13.
- Point out that the Duty to Cooperate seems to have failed if this wasn't discussed with Rotherham.