#### Representation on the Sheffield Plan Publication (Pre-Submission) Draft

#### Respondent details

Comment ID number: PDSP.100.001

What is your Name: Helenjamie

If you are making this representation as a member of an organisation, what is the name of your organisation:

Sheffield CTC

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

Cycle Sheffield

#### Document

Which document to you wish to make a representation on:

Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations

Which section of the document is your representation on:

Chapter 2: Vision, Aims, and Objectives

Which paragraph/site/map layer of the document is representation on:

N/A

#### Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

Sheffield CTC supports the overall strategy which seeks to protect the green belt and open spaces. Sheffield CTC supports the focus on the reuse of vacant and underused, previously developed, (brownfield) sites across the city, an increase of high density housing in the city centre and the creation of '20-minute neighbourhoods' where everyday needs can be met within a short walk or cycle ride. Sheffield CTC fully supports the first two aims of transport strategy:

- Public transport which is integrated, faster and user friendly.
- Better, safer active travel options. Sheffield CTC believes there is an absence of strategy around connections and cycle routes across the city.

Sheffield CTC fully agrees that there is a need for better public transport and to prioritise cycling and walking. Sheffield CTC strongly supports the objectives for a connected city Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocation pg 17

"To create an integrated and sustainable transport network that promotes and enables walking, cycling and public transport, in order to reduce congestion, support district centres, improve air quality and safety, and enable healthier lifestyles."

We feel that the commitment to this objective and a network of active travel routes should be clearly shown on the Policies Map.

The proposal for a cycle network seems to show nothing beyond what is already in place, or planned, in the Connecting Sheffield scheme. This creates a network in the city centre but there are some key areas which are not connected by safe cycle routes.

# Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

One such example is Stocksbridge. Transport links from Stocksbridge into the city centre are already stretched with no safe active travel option. The population will grow significantly, given the housing sites already approved and further development areas set aside in the Draft Local Plan.

Another example is access for students to the University of Sheffield. There are large student populations in Ranmoor, Broomhill, Crookes and Walkley. There are currently no safe active travel routes / cycle routes connecting these residential areas with the University and there are no ambitions to provide any safe routes indicated on the plan policies map.

A final example is the suburbs to the Southeast of Sheffield, from Intake, through Hackenthorpe, Waterthorpe to Halfway which currently have no cycle infrastructure shown on the policies map.

We seek the inclusion of a cohesive and extensive network of active travel routes throughout the city of Sheffield, not just the city centre, to demonstrate the commitment of Sheffield City Council to create a city-wide active travel network.

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

Yes, I wish to participate in hearing session(s)

### If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To be able to share updates and feedback with members

#### Representation on the Sheffield Plan Publication (Pre-Submission) Draft

#### Respondent details

Comment ID number: PDSP.100.002

What is your Name: Helenjamie

If you are making this representation as a member of an organisation, what is the name of your organisation:

Sheffield CTC

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

Cycle Sheffield

#### Document

Which document to you wish to make a representation on:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Chapter 7: A Connected City

Which paragraph/site/map layer of the document is representation on:

N/A

#### Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

Not completed by respondent

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

Sheffield CTC and Cycle Sheffield are concerned that the wording in the plan relating to active travel and public transport measures is not strong enough to ensure that these elements of the plan will be delivered. Historically for example what has been achieved falls short of the policies and pledges relating to cycle routes in the 2009 Core Strategy. Sheffield CTC is aware that this in part is due to shortfalls in funding.

We would like a stronger commitment and ambition from SCC to prioritise active travel and public transport and appeal to councillors to be braver when implementing active travel schemes.

Sheffield CTC and Cycle Sheffield call for statements and policies within the documents to be strengthened in order to demonstrate this commitment and provide a mechanism to ensure this plan is delivered.

Where policies support provision for electric cars, Sheffield CTC and Cycle Sheffield call for the inclusion of provision for electric cycles within the document. Where parking requirements are stated, Sheffield CTC and Cycle Sheffield call for greater, or the same, strength in language to be used for cycles as is used for motorised vehicles.

Part 2 doc, chapter 7, A Connected City. pp 78,79 and 80:

7.6. All developments should include provisions and incentives to increase sustainable and active travel and reduce reliance on the car.

Sheffield CTC and Cycle Sheffield call for 'should' to be replaced by 'must', or at least, 'will be expected to'

POLICY CO1: DEVELOPMENT AND TRIP GENERATION

New development should support the delivery of net zero transport carbon emissions.

Proposals should prioritise travel by public transport, cycling, and walking and incorporate inclusive infrastructure which provides connections to and within the development. This should focus on making the most efficient use of existing highway, including where appropriate reallocation of space to more sustainable modes. Sheffield CTC and Cycle Sheffield call for 'should' to be replaced by 'must', or at least, 'will be expected to'

Provision will also be required to support the increased uptake of electric and zero emissions vehicles, in accordance with the Parking Guidelines (see Policy CO2). Sheffield CTC and Cycle Sheffield call for the addition of electric bicycles here. Sheffield CTC and Cycle Sheffield call for these additional requirements: "New development must not degrade existing walking and cycling infrastructure. Any new walking and cycling infrastructure created as part of a new development must adhere to the latest national design guidelines."

POLICY CO2: PARKING PROVISION IN NEW DEVELOPMENT

Car and cycle parking must be secure and appropriately designed, suitable for the use and location and be accessible and convenient for all users.

Sheffield CTC and Cycle Sheffield support the use of the word 'must' here but call for the inclusion of a requirement for charging infrastructure for electric bikes.

POLICY DE4: DESIGN OF STREETS, ROADS AND PARKING

Sheffield CTC and Cycle Sheffield call for this additional requirement:

"Streets, routes and spaces must therefore be designed or improved to:

Adhere to the latest national guidelines on walking and cycling infrastructure."

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

Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To update and feedback to our membership

#### Representation on the Sheffield Plan Publication (Pre-Submission) Draft

#### Respondent details

Comment ID number: PDSP.100.003

What is your Name: Helenjamie

If you are making this representation as a member of an organisation, what is the name of your organisation:

Sheffield CTC

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

Cycle Sheffield

#### Document

Which document to you wish to make a representation on:

Annex B: Parking Guidelines

Which section of the document is your representation on:

N/A

Which paragraph/site/map layer of the document is representation on:

Cycle Parking Provision

#### Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

Annex B: Parking Guidelines

Sheffield CTC and Cycle Sheffield supports the car parking standards for the Central Area.

However, the policies and guidelines relating to cycle parking are weak in comparison. Sheffield CTC and Cycle Sheffield note the repeated use of the word 'should' relating to the provision of cycle parking. We deem this to be unacceptable. Sheffield CTC calls for 'should' to be replaced by 'must' or 'there is a requirement to' in order to support the vision for a connected city and to enable and encourage modal shift.

Sheffield CTC and Cycle Sheffield call for the following text to be replaced, changes highlighted yellow:

Cycle Parking Developments will need to address the needs of both long-stay (staff, residents) and short-stay (visitor) cyclists. Allocated spaces for non-standard cycles should must also be provided. Cycle parking should must be secure, well-lit and overlooked and within 20m of main entrances.

In order to be considered 'secure', parking related to residential development should must be in a secure building (with a roof) or a locker with an ability to lock the cycles to a fixture inside.

Where it is not possible to provide suitable visitor parking within the curtilage of a development or in a suitable location in the vicinity agreed by the planning authority, the planning authority may at their discretion instead accept, additional long-stay provision or, contributions to provide cycle parking in an appropriate location in the vicinity of the site.

Developers should liaise must consult with neighbouring premises and the local planning authority to identify potential for off-site visitor cycle parking. Secure cycle lockers should must be provided for long stay cycle parking. Sheffield Stands or M Stands should must be provided for short stay and visitor parking.

Short-stay cycle parking should must be available for shoppers, customers, messengers and other visitors to a site, and should will be convenient and readily accessible. Short-stay cycle parking should will be expected to have step-free access and be located within 15 metres of the main site entrance, where possible. For both long-stay and short-stay parking, consideration should be given to providing there must be provision of spaces accessible to less conventional cycle types, such as tricycles, hand cycles, electric cycles, cargo cycles and cycles with trailers and other adapted cycles. This should will be expected to include consideration provision of re-charging facilities for electric cycles.

It is recommended that It will be expected that supporting facilities are provided at land uses where long stay cyclists require them, (i.e. places of employment). Supporting facilities include secure lockers, showers and changing/drying rooms. Where it is not possible to provide adequate cycle parking within residential dwellings, the City Council will engage with developers to propose innovative alternatives that meet the objectives of these standards. This may include options such as providing the required spaces in secure, conveniently located, on-street parking such as cycle hangars. Where there is a lack of space within the curtilage of the proposed development developers will be expected to contribute to the cost of providing cycle parking on the highway.

Where cyclists share surfaces with pedestrians, the safety and accessibility of the environment for disabled and older people must be assured.

Sheffield CTC and Cycle Sheffield call for the wording within this paragraph to be strengthened in order to reflect that the provision of adequate cycle parking is non-negotiable. This must include:

Space for non-standard bikes (Long John, Cargo etc) - the types that replace cars. Electric charging facilities at parking provision at appropriate destinations. People will need to charge bikes at places other than just their home.

Work/Leisure places must be required to provide minimum facilities for the type of cycle users who will be using the premises in order to demonstrate the commitment to encouraging modal shift.

Additionally, Sheffield CTC and Cycle Sheffield are concerned that open air cycle stands are too widely relied upon for all short stay, We call for major new public facing venues to be required to provide fully secure 'medium' stay cycle parking, either indoors or in cycle lockers.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

see above. Email with highlighted text document to be sent

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

Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To update and feedback to our members