

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

Respondent details

Comment ID number: PDSP.124.001

What is your Name: S11swifts

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

S11Swifts

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:

N/A

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 3: An Environmentally Sustainable City - Responding to the Climate Emergency

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 sure to put this comment

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:

There is business potential in biodiversity net gain. Could local fabricators be encouraged to make and market bird and bat bricks etc?

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

No, I do not 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:

N/A

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

Respondent details

Comment ID number: PDSP.124.002

What is your Name: S11swifts

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

S11Swifts

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:

N/A

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:

Policy GS5: Development and Biodiversity

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:

I support this clause but on its own it is not sound, because it is not effective. This is because although "design features to enhance biodiversity" is further defined in the subsequent "Definitions" section, it is unclear on what basis it is that items should be selected and included. Swift bricks are a universal nest brick for small bird species (e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42:

<https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89->

Biodiversity-in-new-housing-developments_FINAL.pdf). Swift bricks are specifically highlighted as valuable to wildlife in NPPG 2019 Natural Environment paragraph 023. Swift bricks are significantly more valuable than external bird boxes for reasons

of longevity, maintenance, aesthetic integration, and better thermal regulation with future climate change in mind. Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM).

Regarding . A) protect, enhance, restore and implement appropriate conservation management of the biodiversity value of the land and buildings; I support this clause but on its on it is not sound, because it is not effective. This is because it is not clear that biodiversity value of buildings includes regular nest sites of birds such as swifts which return to the same nest site each year but are not continuously present.

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:

Please include the following text as an additional item or paragraph under GS5 DEVELOPMENT AND BIODIVERSITY: Swift bricks are considered a universal nest brick for small bird species, so should be incorporated in accordance with best-practice guidance in all developments including extensions unless demonstrated not to be practically feasible (in which case external swift boxes may be specified).

.Regarding A) protect, enhance, restore and implement appropriate conservation management of the biodiversity value of the land and buildings;.... Please include the following text as an additional item or paragraph under GS5 DEVELOPMENT AND BIODIVERSITY: The biodiversity value of buildings includes the regular nest sites of birds such as swifts which return to the same nest site each year but are not continuously present. An ecological survey will advise on the likely presence of such species.

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

No, I do not 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:

N/A

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

Respondent details

Comment ID number: PDSP.124.003

What is your Name: S11swifts

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

S11Swifts

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:

N/A

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:

Policy GS6: Biodiversity Net Gain

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:

Sadly unambitious at 10%

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:

Integrated bat and bird boxes

Taking into account Sheffield Council's declaration of a Biodiversity Emergency GS5 lacks

clarity and ambition with regards to the text about biodiversity enhancements. With many

of our members comprising ecological consultants we know the propensity of developers (particularly larger housebuilders) to exploit loopholes in planning authority requirements.

With this in mind, the existing text in CS5 I) that wherever relevant development should

'incorporate design features to enhance biodiversity' does not bind any set level of commitment, particularly in relation to integrated bat and bird boxes.

□ Within the Definitions section it states Design features to enhance biodiversity – could

include for example green roofs, swift bricks, bird and bat boxes, hedgehog holes in walls and

fences, water features, planting native or wildlife-attracting trees, shrubs wildflowers etc. Of

these things Biodiversity Net Gain (covered in Policy CS6) already covers the creation of

water features and planting of trees, shrubs and wildflowers so it would be better to focus

on bat and bird boxes and hedgehog holes.

□ Integrated bat and bird boxes can cost as little as £30/unit (roughly 0.0001% of the value of

an average English home), whilst hedgehog holes are free. Including boxes at a high ratio in

new developments will not impact on plan viability.

□ The following respected organisations recommend a ratio of one swift nesting provision per

dwelling:

o RIBA - 2nd edition Design for Biodiversity

o BS42021 Integral nest boxes - Selection and installation for new developments which

was published on 29th March 2022

□ There are also examples of councils requiring that all new dwellings include bird and/or bat

boxes. For example:

o Greater Cambridge (see

<https://www.greatercambridgeplanning.org/media/2474/gcsp-biodiversity-spd-feb-2022.pdf>) require integrated swift boxes in 100% of new dwellings with integrated

bat boxes in 25% of new dwellings.

o Leeds Council require that "50% of new dwelling buildings should have an integral bat roosting feature or swift brick i.e. one per two detached houses, one per semi-detached house, a terrace of ten houses should have a minimum of five features" and that a large building (school, industrial building, hospital etc.) should have 10 - 20 features

(<https://www.leeds.gov.uk/docs/Bat%20Roost%20and%20Swift%20Brick%20Features%20Guidance.pdf>).

□ In order for it to be fit for purpose South Yorkshire Bat Group would like to see Policy GS5

amended to specifically state that all new dwellings and other new buildings should include

at least one integrated swift box, with at least 50% of new dwellings to include one

integrated bat box, and that larger buildings (schools, industrial buildings, hospitals etc.)

should have at least 10 features. The policy should also state that hedgehog holes must to

be included at all fence or wall junctions in new developments as standard practice.

The possibility of supplementary guidance needs to be allowed for to provide additional

detail to underpin the policy. Possibly combined with supplementary guidance associated

with GS6.

GS6: Biodiversity Net Gain

In line with our comments in relation to buffer zones in GS5, we would like to see the text in

GS6 require developers to install compensation habitats adjacent to key blue and green

infrastructure in order to help address Policy BG1. To achieve this, the policy set out that this

buffer would comprise a strategically important location. In these areas habitats score 15%

more biodiversity credits, making any biodiversity loss in these areas more expensive and

any gain in these areas more valuable.

The applicability, or not, of the policy to householder applications should be made clear

either in the policy itself or the supporting text.

The implementation of this policy will require supplementary guidance such as that produced by Doncaster Council. Appropriate wording needs to be added to the policy or

supporting text allow for this.

Clarification is required with respect to Paragraph B and how off-site delivery will be

achieved. Sheffield Council must take a lead to facilitate this possibly using a similar model

as adopted by Doncaster. Again the need for supplementary guidance is paramount.

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

No, I do not 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:

N/A