

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

Respondent details

Comment ID number: PDSP.135.001

What is your Name: Nathan

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

Sheffield Street Tree Partnership (SSTP)

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 do 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:

Policy SA1: Central Sub-Area

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:

The SSTP wish to see a consistent approach applied to the provision of green spaces and the requirement for street tree planting across the Central Sub-Area. This area will see a significant increase in housing and therefore a commensurate need for open space and to tree planting that affords a full suite of eco-system services. The Council's Open Space Assessment 2022, identifies that Sheffield ranks in the bottom 5 for green space within its city centre. Only policy CA2B - Priority Location in Wicker Riverside (item h) requires the planting of street trees. The SSTP believe that the requirement for street tree planting should be reinforced across all Central Sub Areas in order to meet the requirements of NPPF para 131. This would

strengthen and accord with Local Plan Part 2 Policy GS7: Trees, Woodlands and Hedgerows.

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:

Not completed by respondent

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

Not completed by respondent

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

I would be happy to participate in my capacity as chair of the SSTP in order to seek a stronger policy commitment to street tree planting. recognising the relatively modest changes we are seeking I equally would not wish to take up the inspector's time un

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Respondent details

Comment ID number: PDSP.135.002

What is your Name: Nathan

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

Sheffield Street Tree Partnership (SSTP)

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 do 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:

Policy GS5 Development and Biodiversity part L is ambiguous and does not therefore wholly comply with Para 131 of the NPPF.

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:

Suggest amendment to the wording of the definition 'Design features to enhance biodiversity': Design features to enhance biodiversity and create opportunities for species could include green and brown roofs, street trees, other native trees,

hedgerows and shrubs, wildflowers, bird boxes or platforms, swift bricks, bat boxes, bat bricks or tiles, hedgehog holes in walls and fences, water features, etc

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Comment ID number: PDSP.135.003

What is your Name: Nathan

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

Sheffield Street Tree Partnership (SSTP)

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 do you wish to make a representation on:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy GS7: Trees, Woodland and Hedgerows

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:

Policy GS7 Trees, Woodlands and Hedgerows should more explicitly recognise Paras 131 and 174 of the NPPF - i.e. the provision of street trees and the benefits from natural capital and ecosystem services from trees and woodland.

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:

Suggested addition of Street Trees in title to recognise the distinction i.e. from Trees, Woodlands and Hedgerows to Trees, Street Trees, Woodlands and Hedgerows.
Modify para 8.27 to recognise the biodiversity value of trees as follows:

"Sheffield's trees, woodlands and hedgerows and an important part of the city's green infrastructure and character. They form an important part of the city's distinctive townscape and provide a setting for relaxation and community activity. Trees and woodlands also play an important role in the biodiversity of the city, mitigating climate change, air quality, traffic calming, well-being and managing flood risk."

Insert new para 8.29 "Tree planting and woodland creation should follow recognised good practice and contribute to the delivery of the Sheffield Street Tree Strategy and/or the Sheffield Woodland Strategy, South Yorkshire Woodland Creation Plan, or the South Yorkshire Nature Recovery Strategy/Nature Recovery Network as appropriate."

Justification: To recognise best practice and/or relevant guidance.

Suggested alterations to the wording of policy GS7 as follows:

GS7 part c - "Where existing trees are within or immediately adjacent to a development site, development proposals should give priority to retaining good condition trees and trees of heritage value and ensure that trees are adequately protected during the demolition and/or construction phases of the development"

Justification: Tree professionals measure and record tree condition. Tree quality is a subjective term.

GS7 part e) - The NPPF seeks the provision of tree-lined streets unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate. Requiring a minimum of 10% of new planting to be on street for developments of 10 or more suggests that developments of fewer number are not required to plant street trees and would therefore not be in keeping with the thrust of para 131.

Equally a minimum of 10% does not provide a reliable method of establishing a coherent street planting strategy where street trees are planted to contribute to placemaking, dispersed evenly, contribute to wildlife corridors etc. The SSCP would suggest that the policy refer back to the Sheffield Street Tree Strategy. The strategy seeks an increase in canopy cover, as such one method would be to replace a 10% requirement with a measure that requires a specified percentage canopy cover.

Cities such as Plymouth and Canterbury for example, are all referencing canopy cover as a policy metric. Of relevance is the work of Prof. Cecil Konijnendijk van den Bosch on his 3-30-300 rule for example - see link

(<https://iucnurbanalliance.org/promoting-health-and-wellbeing-through-urban-forests-introducing-the-3-30-300-rule/>)

Suggest an additional clause to distinguish street planting from tree planting in open spaces, gardens etc, is added after point (f) as follows:

"The species of street trees should be chosen in line with current guidance from the Sheffield Street Tree Partnership to reflect the fact that streets in hard standing need to be resilient to both a challenging environment (arid, prone to salt and air pollution) and a changing climate."

Should an additional clause be accepted (as above) suggest an alteration to the wording of clause (f) with regard to other trees as follows: Native trees and hedgerows of local origin should be used and, where appropriate reflect similar habitat(s) of ecological importance and not conflict with other important habitats, natural features or archaeological remains;

Justification: To distinguish trees planted within open spaces etc from Street Trees.
Suggest alteration to the wording of clause (g) as follows:

"New street trees and other green infrastructure should be considered early in the design and located so that they are integrated into the street scene avoiding potential conflict with other features or activities and that the benefits of green infrastructure can be maximised.

Justification: A critical first step is that trees are considered at the very early stage of a development proposal. They cannot be an afterthought otherwise they are liable to failure. Issues such as shrinkable soils, foundations for low-rise buildings (housing), utility infrastructure and subsidence all have a bearing on what can be planted.

Trees should be regarded as assets rather than liabilities. If trees are planted in the most appropriate way for their location and the needs of the tree are taken into account from the outset then, once

the tree has achieved independence in the landscape (BS8545), and following post-planting structural pruning undertaken to raise the canopy etc, then there should not be significant ongoing costs beyond regular tree inspections until trees reach the end of life.

Suggest alteration to the wording of clause (i) as follows:

"Appropriate provision should be made for replacement of failed trees (based on the Trees in Town average estimated at 27% for street trees and Forestry Commission allowance for 30% within woodlands) and ongoing management of any trees, woodlands and hedgerows that have been planted and appropriate measures should be put in place to minimise the risk of trees failing including adequate watering."

Justification: NPPF para 131 "that appropriate measures are in place to secure the long-term maintenance of newly-planted trees".

Definitions

'Good quality trees' identified in the tree survey as being of high or moderate value and capable of making a significant contribution to the area for 20 or more years.

Suggest the following minor modification in line with Industry terminology:

"Good condition or high heritage value trees" – identified in the tree survey as being of high or moderate condition (Categories A&B) and capable of making a significant contribution to the area for 20 or more years and/or have a significant heritage value.

Further information

The Sheffield Street Tree Strategy provides more advice and guidance on the considerations that need to be taken into account when planting and managing trees in the highway

Minor amendment

The Sheffield Street Tree Partnership and Strategy provides more advice and guidance on the considerations that need to be taken into account when planting and managing trees in the highway

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Not completed by respondent

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

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Comment ID number: PDSP.135.004

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Sheffield Street Tree Partnership (SSTP)

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 do you wish to make a representation on:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy DE4: Design of Streets, Roads and Parking

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: Not completed by respondent

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:

Expression of support

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:

Wholly support the inclusion of para 9.13. "Street trees contribute to the city's green infrastructure and the character of its urban streets and neighbourhoods. They bring a wealth of benefits to the city by helping to reduce air pollution and flooding, increase biodiversity, provide cooling, shade and shelter while also helping to reduce

our stress levels. Policy GS7 provides more details on the planting and maintenance of street Trees."

Supporting evidence

Microclimate impacts and the environmental performance of buildings - As we respond to climate change and the impact on our urban microclimates, it is important to recognise the role of trees in both cooling the urban climate and, when placed correctly, cooling the facades of low rise (up to 4 storey) buildings. Research shows that planting more trees could reduce premature heat-related deaths in European cities by a third (<https://jech.bmjjournals.org/content/64/9/753.short>)

Sugest minor modification to Policy DE4

"Roads, pedestrian routes and areas, cycleways, and public spaces should be well-connected, legible and permeable, providing safe and attractive travel choices, and should adhere to the principles of inclusive and dementia friendly design. Streets, routes and spaces should therefore be designed or improved to:

f) ensure buildings and trees create enclosed spaces where the height of buildings and the width of streets and spaces is well proportioned and generates a sense of enclosure appropriate to the area; and which follows the best practice of specifying the right tree in the right place" "

Justification:

Reflects NPPF Para 131 - "Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users."

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