

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

### Respondent details

**Comment ID number:** PDSP.188.001

**What is your Name:** Boo

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

N/A

**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 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:** Yes

**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 am delighted and relieved that environmental sustainability lies at the heart of the Vision as well as of Aims 2 ('An environmentally sustainable city') and 7 ('A green city that continues to cherish, protect and enhance its biodiversity and green and blue infrastructure.').

**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):**

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.188.002

**What is your Name:** Boo

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

N/A

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

**Which section of the document is your representation on:**

Chapter 5: Topic Policies

**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 draft Plan is strong (Policy BG1) on protecting existing green spaces but does not do enough to define and develop joined up networks of new wild and green spaces. Existing spaces are often not connected, drastically limiting their usefulness for nature. The Nature Recovery Network plans must be included as an enforceable part of planning as soon as they are available.

Sheffield's rivers and streams are existing connecting networks, important for many species including otters. There needs to be a generous buffer zone around the waterways, potentially up to 20 metres, plus measures to discourage humans and dogs from entering the water. Natural vegetation should be preserved and enhanced for the benefit of wildlife and humans, and wildlife shelter areas considered at the

planning stage for uncovering waterways and for new green spaces, on the lines of the existing 'bird reserve' area of Ecclesall Woods and parts of the General Cemetery.

**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):**

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.188.003

**What is your Name:** Boo

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

N/A

**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 ES1: Measures Required to Achieve Net Zero Carbon Emissions in New Development

**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:**

Government advice defines a clear hierarchy of waste, with re-use of material in its original form the highest priority; recycling (reprocessing into a new product) next; and energy recovery last. The Climate Emergency and mandatory targets on carbon emissions justify a strong policy that recognises the lower energy and climate impacts of re-use. Re-use of buildings is the most effective in climate and resources terms and is

strongly supported by RICS, RIBA, the House of Commons Environmental Audit Committee, European Academies Science Advisory Council (which includes the Royal Society), and the Royal Academy of Engineering. It is especially concerning that a requirement for Whole Life Cycle Carbon Assessments in an earlier draft of the plan has been dropped

**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:**

Policy ES1 should be amended to include a “re-use first” policy for both buildings and materials, rigorously enforcing the waste hierarchy and allowing lower priorities only where higher priority options are impossible, as assessed by parties independent of the developers, and to re-instate the requirement for Whole Life Cycle Carbon Assessments.

**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.188.004

**What is your Name:** Boo

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

N/A

**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 NC15: Creating Open Space in Residential Developments

**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:** Yes

**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:**

Point 4.50 on page 48 of part 2 states that 'Integrating open space within development sites ... provides broader environmental benefits and ... can help ... meet the requirement of providing Biodiversity Net Gain'. It is necessary to specify those types of open space which offer most benefit to both people and wildlife over the lifetime of the space - e.g. a copse of trees as an alternative to a wildflower meadow.

**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):**

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.188.005

**What is your Name:** Boo

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

N/A

**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 8: A Green City – Responding to the Biodiversity 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:**

Policy GS5 calls for development to protect and promote biodiversity. Policy GS6 builds on this by requiring Biodiversity Net Gain. Policies GS9, GS10 and GS11 concern flood risk, water resources and drainage. All have the potential for impact on waterways and waterpower infrastructure, but nowhere in these policies is their heritage value acknowledged, and neither is there any reference to the value of artificial waterways as habitat nor their potential to assist in flood risk mitigation. These are serious omissions, and the policies as

they stand constitute a threat to Sheffield's river valleys and their complex system of man-made infrastructure, described in the Council's Sheffield Waterways Strategy as a globally important place.

These policies currently fall very significantly short of providing sufficiently for the conservation and enhancement of the natural, built and historic environment (NPPF 20(d)), recognising historic waterways as an irreplaceable resource to be conserved in a manner appropriate to their significance (NPPF 189) or a positive strategy for the conservation and enjoyment of the historic environment (NPPF 190).

As point 8.1 on pg 83 in Part 2 states, "The UK is one of the most nature depleted countries in the

world, with species declining at alarming rates ...", a situation to which the city responded in May

2021 by declaring a Biodiversity Emergency. But the intended Biodiversity Net Gain (BNG) target in

the Plan is only 10% (Page 17 in Part 1) whereas other places have set elements of it substantially higher than this (e.g. Cambridge at 20% for all council developments). The way in which clear links have been made between public health, climate change and

biodiversity is very welcome. (e.g. in point 8.2 on pg 83 of Part 2). However the role of wildlife and green spaces in adapting to climate change needs to be given greater weight in the points and policies that follow.

In Point I in Policy GS5 'Development & Biodiversity' (on pg 92 of Part 2), much greater

clarity is needed around the requirement to incorporate wildlife-friendly design features into new

buildings. Although examples (including 'swift bricks') are given in the 'Definitions' box beneath,

there is no clear expectation of the extent to which these will be required. What types/percentage of

properties will be required to incorporate such measures? For example, requiring swift bricks to be

incorporated in all new properties of two storeys or above would not be unreasonable, especially as they are

very cheap to incorporate into new brickwork.

In the section on Trees, Woodlands & Hedgerows' it needs to be clarified (e.g. in Policy GS7 pg 95 –

96 in Part 2) that not all new trees are of equal wildlife value. More specific guidance is required on

which species would best enhance biodiversity, for example, berry bearing trees and shrubs. It

needs to be clarified that, although native species are often the most appropriate, trees and shrubs

of value to wildlife do not necessarily need to be native.

**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:**

The wording of policies GS5, GS6, GS9, GS10 and GS11 must be amended to refer explicitly to and protect the heritage value of historic waterways and waterpower infrastructure, and their settings. There should be specific prohibition of measures such as the destruction of historic weirs, changes to water levels in dams and goits, or decanalisation of historic artificial channels. Increase the Biodiversity Net Gain target to a minimum of 20% for all development. Be more specific and ambitious about requirements for wildlife-friendly design features in new buildings.

**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.188.006

**What is your Name:** Boo

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

N/A

**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 DE9: Development and Heritage Assets

**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 existing Sheffield Conservation Areas have been successful in protecting the unique atmosphere of a range of areas for the present and the future. There should be provision for the proactive identification and designation of new Conservation Areas, in compliance with the Planning (Listed Buildings and Conservation Areas) Act 1990 s69(1).

Policy DE9 calls for the conservation and sustainable use of heritage assets, including those which are locally listed or non-designated. The policy makes no provision for around forty Areas of Special Character (ASC)

which since 1998 have been identified and protected in the Unitary Development Plan for their special architectural or historic interest. These areas are non-designated heritage assets and deserve assessment for designation as Conservation Areas, although this has not been done for the great majority of ASCs.

Removing their protection is a retrograde step in the protection of the city's historic environment.

Although local listing is referred to there is no provision for the creation, maintenance or expansion of the

Local Heritage List and no description of its importance. It was a major coup for Sheffield to have created and supported the first such List to be created by the public, from the roots up, and to have it adopted and welcomed by the council. It would be very poor for the LHS to lose its importance and place in the planning strategy world so soon after its creation.

Sufficient provision needs to be made for the conservation and enhancement of the natural, built and historic environment

(NPPF 20(d)) and to ensure that developments are sympathetic to all aspects of local character and history

(NPPF 130(c))

**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:**

Policy DE9 and/or other relevant policies should be amended so as to maintain protection for Areas of Special

Character; provide for the creation, maintenance and expansion of the Local Heritage List; and proactively

identify and designate new Conservation Areas.

**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.188.007

**What is your Name:** Boo

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

N/A

**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:**

Annex A: Site Allocations

**Which section of the document is your representation on:**

Policy SA2: Northwest Sheffield

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

NWS29

### 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:**

It is excellent that the allocated sites for development largely exclude green belt and focus on brownfield sites (Point 3.4 on p 19 of Part 1).

However not all brownfield sites are the same; some have developed into valuable wildlife habitats. In particular, some of the Site Allocations incorporate parts of Local Wildlife Sites (LWS) within their boundary. These are sites SES02 (Land adjacent to the River Rother, Rotherham Road, S20 1AH incorporating part of Rother Valley: Beighton to Holbrook LWS), SES04 (Mosborough Wood Business Park) and SES05 (Land to the east of New Street S20 3GH) both of which include parts of the Short Brook & Carr's Marsh LWS, and NWS29 (Former Sheffield Ski Village S3 9QX

which includes significant parts of Parkwood Springs LWS). The boundaries of these Site Allocations should be revised to entirely exclude the Local Wildlife Sites.

**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):**

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.188.008

**What is your Name:** Boo

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

N/A

**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:**

Annex A: Site Allocations

**Which section of the document is your representation on:**

Policy SA5: Southeast Sheffield

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

SES02

### 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:**

It is excellent that the allocated sites for development largely exclude green belt and focus on brownfield sites (Point 3.4 on p 19 of Part 1).

However not all brownfield sites are the same; some have developed into valuable wildlife habitats. In particular, some of the Site Allocations incorporate parts of Local Wildlife Sites (LWS) within their boundary. These are sites SES02 (Land adjacent to the River Rother, Rotherham Road, S20 1AH incorporating part of Rother Valley: Beighton to Holbrook LWS), SES04 (Mosborough Wood Business Park) and SES05 (Land to the east of New Street S20 3GH) both of which include parts of the Short Brook & Carr's Marsh LWS, and NWS29 (Former Sheffield Ski Village S3



9QX which includes significant parts of Parkwood Springs LWS). The boundaries of these Site Allocations should be revised to entirely exclude the Local Wildlife Sites.

**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):**

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.188.009

**What is your Name:** Boo

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

N/A

**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:**

Annex A: Site Allocations

**Which section of the document is your representation on:**

Policy SA5: Southeast Sheffield

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

SES04

### 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:**

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9QX which includes significant parts of Parkwood Springs LWS). The boundaries of these Site Allocations should be revised to entirely exclude the Local Wildlife Sites.

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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):**

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.188.010

**What is your Name:** Boo

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

N/A

**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:**

Annex A: Site Allocations

**Which section of the document is your representation on:**

Policy SA5: Southeast Sheffield

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

SES05

### 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:**

It is excellent that the allocated sites for development largely exclude green belt and focus on brownfield sites (Point 3.4 on p 19 of Part 1).

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9QX which includes significant parts of Parkwood Springs LWS). The boundaries of these Site Allocations should be revised to entirely exclude the Local Wildlife Sites.

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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):**

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