

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

### Respondent details

**Comment ID number:** PDSP.285.001

**What is your Name:** Jonathan789

**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:**

It is excellent 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.').

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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.285.002

**What is your Name:** Jonathan789

**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 3: Growth Plan and Spatial Strategy

**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:**

It is very positive that the allocated sites for development almost entirely exclude green belt and focus on brownfield sites (Point 3.4 on pg 19 of Part 1).

The designation of Owlthorpe Fields and Bole Hill Wood as Local Green Spaces and the fact that Smithy Wood is not defined as an area for development are all extremely welcome.

Despite the welcome emphasis on developing brownfield sites, not all of these are the same; some may 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.

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Not completed by respondent

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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.285.003

**What is your Name:** Jonathan789

**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:**

Policy BG1: Blue & Green Infrastructure

**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:**

The draft Plan is strong (Policy BG1 on pg 103 of Part 1) on protecting existing green spaces but lacks sufficient ambition to define and develop new wild and green spaces. Map 17 is captioned as showing 'Blue and Green Infrastructure and the Green Network' whereas, in fact, it largely shows existing sites, many of which are highly disjointed from one another and so cannot realistically be described as a network. It is appreciated that the Nature Recovery Network currently in preparation across South Yorkshire hasn't yet been included in the Local Plan due to the maps for this not yet being available and that it is the intention of the Council to include this as a supplement – an essential move.

Point 174d in the National Planning Policy Framework expects Local Plans to establish 'coherent ecological networks that are more resilient to current and future pressures' with Point 175 requiring 'a strategic approach to maintaining and enhancing networks of habitats and green infrastructure'. Point 179b requires plans to 'promote the conservation, restoration and enhancement of ... ecological networks ...'

Such networks are essential if the city is to achieve its aim of a minimum 10% net increase in biodiversity. Enhancement of natural spaces needs to go beyond the currently identified blue and green areas and focus in addition on increasing and improving green space across the city.

**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:**

New areas need to be identified to connect existing blue and green infrastructure. Creation of new assets is particularly needed in areas where current provision is low. As with brownfield sites, not all green spaces are of equal wildlife value. Some are already excellent but others contain substantial areas of little wildlife value, particularly where land is primarily dedicated to sport and recreation. Specific objectives should be included to make such areas better for wildlife alongside retaining and enhancing their wider recreational value.

**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.285.004

**What is your Name:** Jonathan789

**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:**

Policy BG1: Blue & Green Infrastructure

**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:**

The draft Plan is strong (Policy BG1 on pg 103 of Part 1) on protecting existing green spaces but lacks sufficient ambition to define and develop new wild and green spaces. Map 17 is captioned as showing 'Blue and Green Infrastructure and the Green Network' whereas, in fact, it largely shows existing sites, many of which are highly disjointed from one another and so cannot realistically be described as a network. It is appreciated that the Nature Recovery Network currently in preparation across South Yorkshire hasn't yet been included in the Local Plan due to the maps for this not yet being available and that it is the intention of the Council to include this as a supplement – an essential move.

Point 174d in the National Planning Policy Framework expects Local Plans to establish 'coherent ecological networks that are more resilient to current and future pressures' with Point 175 requiring 'a strategic approach to maintaining and enhancing networks of habitats and green infrastructure'. Point 179b requires plans to 'promote the conservation, restoration and enhancement of ... ecological networks ...'

Such networks are essential if the city is to achieve its aim of a minimum 10% net increase in biodiversity. Enhancement of natural spaces needs to go beyond the currently identified blue and green areas and focus in addition on increasing and improving green space across the city.

Sheffield's rivers and streams play a vital role as wildlife corridors, especially (but not just) for aquatic species such as kingfisher, goosander, dipper and otter (a priority species in the UK Biodiversity Action Plan and classified as 'Near Threatened' on the IUCN Red List (2004)). With this in mind, the Plan needs to be more ambitious and prescriptive regarding the width of the buffer zones specified for these – 15 (or even 20) metres seems to be appropriate. Existing natural vegetation including trees and shrubs should be preserved with new ones planted if relevant. This all ties in well with plans to 'open up' the city's watercourses as well as to avoid development on areas vulnerable to flooding.

Extending the 'natural network' is not just about protecting and enhancing wildlife. As shown in Figure 12 in the Open Spaces Assessment document (in supporting evidence), Sheffield is currently some way off meeting Natural England's national Accessible Natural Green Space standards. So a 'locally derived access standard' with lower expectations has been developed (Figure 11) but even this doesn't show all areas of the city having sufficient access to Accessible Natural Green Spaces. Greater ambition is needed i.e. much closer to Natural England's nationally accepted definitions.

Care needs to be taken to ensure that public access to green spaces does not impinge unduly on biodiversity. Many of Sheffield's green spaces experience considerable pressure from people and dogs. Appropriate sections of public green spaces in which access could be restricted or passively discouraged to protect and enhance biodiversity should be identified. There are already some precedents for this, for example the 'nature reserve' area of Ecclesall Woods and parts of the General Cemetery.

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New areas need to be identified to connect existing blue and green infrastructure. Creation of new assets is particularly needed in areas where current provision is low. As with brownfield sites, not all green spaces are of equal wildlife value. Some are already excellent but others contain substantial areas of little wildlife value, particularly where land is primarily dedicated to sport and recreation. Specific objectives should be included to make such areas better for wildlife alongside retaining and enhancing their wider recreational value.

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**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.285.005

**What is your Name:** Jonathan789

**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:** Yes

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The way in which (Policy ES1 on pg 11 of part 2) new developments need to 'create and restore habitats that absorb carbon, such as wetlands and woodlands' is welcome. RSPB nationally has done some significant work on this with nationally well known house builders to which the Council could be directed. (See <https://www.rspb.org.uk/globalassets/downloads/documents/conservation--sustainability/223-0282-20-21-barratt-developments-plc--rspb-16pp-05-07-21.pdf>)

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**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.285.006

**What is your Name:** Jonathan789

**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 4: Creating Sustainable Communities - 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

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In relation to point 4.50 on page 48 of part 2 which recognises that 'Integrating open space within development sites ... provides broader environmental benefits and ... can help .... meet the requirement of providing Biodiversity Net Gain', there is a need to clarify that not all green spaces are of equal value and to specify those which are of the greatest benefit to both people and wildlife.

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**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.285.007

**What is your Name:** Jonathan789

**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

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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 a modest 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 much to be welcomed. (e.g. in point 8.2 on pg 83 of Part 2)

Although the role of wildlife and green spaces in combating and adapting to climate change is mentioned in Point 8.2 on pg 83 of Part 2, this needs to be given greater weight in the points and policies that follow.

With regard to Point I in Policy GS5 'Development & Biodiversity' (on pg 92 of Part 2), much greater clarity is needed around the requirement for incorporation of 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 place an unreasonable demand on developers, especially as they are very cheap to incorporate into new brickwork. In 2021, Swifts were added to the 'UK Red List', joining House Sparrow and Starling which have also declined due to changes in building techniques and which can also make use of swift bricks as breeding/roosting spaces. House Martins were another species added to this list in 2021 and these too can benefit from the installation of swift bricks and other artificial nest sites.

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

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N/A