

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

Respondent details

Comment ID number: PDSP.332.001

What is your Name: Nickyleaf

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: 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:

"De-culverting of the River Sheaf (where possible), integrating it into the public realm and using blue and green infrastructure to enhance quality of place and amenity"

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:

Re culverting, who decides what is possible? I refer to Simon Ogden's article in Sheffield Telegraph 9/2/23. (Opinion: Why are we not doing more to open up rivers?)

"I wanted to add his sensible comments in to my submission but I'm finding making comments very confusing and difficult.

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.332.002

What is your Name: Nickyleaf

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 1: Introduction to Part 2

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 can't find anything about the need to enforce installation of permeable surfaces in parking areas or drives, renewed or new. Also, can't see anything about the need to reduce unnecessary light pollution. This is essential for wildlife and energy saving.

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:

Need to enforce SUDS-compliant installation of permeable surfaces in parking areas and drives, renewed and new. Also, for sake of wildlife and energy-saving need to reduce and discourage unnecessary light pollution eg use downward-facing light

sources low to the ground and dim lighting, reduce city's total amount of light, as well as artificial light scattered into the atmosphere. See 'The Darkness Manifesto' Johan Eklof.

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:

Would like to witness discussion.

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

Respondent details

Comment ID number: PDSP.332.003

What is your Name: Nickyleaf

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 EC7: Promoting Local Employment in 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:

Small builders would benefit from free training on sustainability issues. Assuming that directors and managers in larger developers are already fully-skilled.

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:

Easy and low-cost to skill-up local small builders on sustainability issues. Include friendly info sheets in routine planning communications. SUDS, biodiversity (eg swift bricks), light pollution, hedges, not fences, verge protection (eg Building materials

should not be stacked with 1m of the stem of the tree under NJUG guidelines. The reason for this is heavy materials such and pallets of bricks etc can cause soil compaction leading to either damage to roots or more likely meaning roots cannot access nutrients in the soil due to being unable to penetrate the compacted soil).

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:

Would like to know this is acted on.

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

Respondent details

Comment ID number: PDSP.332.004

What is your Name: Nickyleaf

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 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:

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:

Policy GS6 – Biodiversity Net Gain

I support the statements in this policy but am concerned that it shows no awareness of the particular species which depend on buildings and are likely to be displaced through the

redevelopment of brownfield sites. Swifts in particular are totally dependent on buildings for nesting sites and, because they are resident for only three months of each year and their nests are not visible externally, are often not picked up in surveys. It is not clear which of the several bird surveys available are required by the council. A knowledge of where they nest and the replacement of nests with swift bricks built into new development can provide homes both for swifts and many other hole-nesting birds such as sparrows which depend on 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 using advice would not place an unreasonable demand on developers. It is easy, cheap and inconspicuous to incorporate them into new brickwork.

There is unlikely to be regulated nationally, swift survival depends on local action. See <https://petition.parliament.uk/petitions/626737> and <https://you.38degrees.org.uk/petitions/make-swift-bricks-mandatory-for-all-new-build-and-extensions-in-sheffield>

(There is a business opportunity here for local fabricators, making and selling goods like Swift bricks for the BNG market. Could SCC or the Chamber of Commerce act on this?)

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.

As a supplementary planning document will include more detail on the Local Nature Recovery Network, I'm assuming that this will include important recommendations on siting and reassurances for architects etc that these small delightful birds are not vermin, smelly or dirty, that swift bricks do not allow the birds access to the loft space and if we don't act urgently they risk extinction.

Doc below for Sheffield LA, contains inter alia:

Model Planning Condition

Model clause for Local Plan or other planning guidance document

Examples of other LA's with similar requirements

Statutory Bodies

Suppliers of Swift bricks

https://docs.google.com/document/d/1vHy5q-c3UdxduxuaVvJva7th7dFn3_M3HDI6lJnWU8Dg/edit?usp=sharing

Model clause for Local Plan or other planning guidance document

This city's wildlife depends not only on green spaces, but also on the artificial fabric of the city. Buildings can provide roosting sites for bats and nesting opportunities for birds such as swifts, house sparrows, house martins and starlings, species that have seen large population declines, and which are dependent on built areas for their survival. Walls can provide habitats for many species of plant, including ferns and mosses, and also provide spaces for invertebrates. Developments involving refurbishment and/or extension of existing buildings may impact species using the existing building, therefore measures to ensure retention and enhancement of such species will be required. Developments involving new and existing buildings should also utilise opportunities to attract new species to a site through such measures. All wildlife habitats must be designed in accordance with the council's Biodiversity Action Plan.

Swift bricks should be incorporated within developments (refurbishments, extensions and new build) to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house sparrows, house martins and starlings, in addition to integral bat boxes.

Swift bricks are also used by house sparrows and other small bird species so are considered a 'universal brick'. Integrated nesting bricks are preferred to external boxes for reasons of longevity, reduced maintenance, better temperature regulation with future climate change in mind, and aesthetic integration with the building design. Swift bricks should be installed in accordance with best-practice guidance, e.g. BS 42021:2022, which recommends one swift brick per dwelling on average in each development, installed as high as possible.

Masonry-fronted swift bricks will regulate the internal temperature so can be placed on any elevation, but ideally should be installed under shade-casting eaves or avoiding southerly elevations. They should be installed in groups of at least three (when three or more are to be installed in the development), at a height above 5m, and preferably with a 5m clearance between the host building and other buildings or obstructions. Where possible avoid siting swift bricks above windows or doors. Where swift bricks are not practical due to the nature of construction, alternative designs of suitable swift nest boxes should be provided in their place. If it is not possible to provide swift bricks as set out in the report, the condition will be modified to require swift boxes.

Wildlife in the UK is protected under the Wildlife and Countryside Act (1981) (as amended). Before you start any works to a property you need to make sure wildlife and protected species would not be affected. Before undertaking works, check the roof space for bird / bat roosts and other urban wildlife dependent on buildings for shelter. Any works that would affect breeding birds and their nests, such as works of demolition, vegetation removal or site clearance, should be done outside the nesting season from 1st March to 31st August inclusive. Also note that any scaffolding even for minor external works can prevent birds accessing their nest sites in buildings. Bats use existing holes and gaps in trees and buildings for nesting. They can fit in gaps as small as a human thumb, so be mindful of missing tiles or gaps within the roof soffits and building fabric before you start any works.

Where practicable, demolition and site clearance works should be carried out outside of the bird breeding season (March to August inclusive). Potential wildlife habitats to be disturbed by construction work should be surveyed by a qualified ecologist at the appropriate time of year and immediately prior to commencement of works. Multiple surveys may be necessary and will include checking for presence of protected and priority species, surveying buildings for roosting and nesting by bats and birds, and

consideration of the impact of noise, vibration and light spillage at night. The ecologist will be required to make recommendations on mitigation measures and restoration work to ensure that the site is of an equivalent or richer ecological status after work ceases.

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:

I would like to witness discussions.