

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

### Respondent details

**Comment ID number:** PDSP.375.001

**What is your Name:** Sean\_Ashton

**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.').

**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.375.002

**What is your Name:** Sean\_Ashton

**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:** 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:**

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 and the site in the Loxley Valley are 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 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).

**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 boundaries of these Site Allocations should be revised to entirely exclude the Local Wildlife Sites.

**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.375.003

**What is your Name:** Sean\_Ashton

**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:**

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)).

**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 width of buffer zones needs increasing to 20 metres and the vegetation along the city's water courses needs to provide shelter and be restored where necessary.

**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.375.004

**What is your Name:** Sean\_Ashton

**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:**

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.

**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:**

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.

**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.375.005

**What is your Name:** Sean\_Ashton

**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 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 disconnected from one another and don't function 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.

**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 nature recovery network needs to be included in the plan as a separate entity to the Blue and Green Infrastructure and effort needs to go into developing natural corridors across the city.

**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.375.006

**What is your Name:** Sean\_Ashton

**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:** 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:**

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'.

**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 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.

**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.375.007

**What is your Name:** Sean\_Ashton

**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:**

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).

**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 BNG needs to be more ambitious with wording changing to make it a minimum of 10% although a higher target will be more ambitious. I appreciate that the plan needs to be economically viable but the inclusion of e.g. Swift bricks into all new properties will be done at minimal cost to the construction firms involved.

**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.375.008

**What is your Name:** Sean\_Ashton

**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: 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:**

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.

**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:**

Whilst still allowing for there current recreational uses, areas of the city's greenspaces and parks should be developed for nature and even some areas left to rewild.

**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.375.009

**What is your Name:** Sean\_Ashton

**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:**

NWS11

### 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 site of the Old Blue Ball is a very suitable site for redevelopment but the Hillsborough Arcade is a well-used part of the community with a selection of shops including Boots and Wilkinson's. I see from the plan that the redevelopment is only for houses, not to include shops as well. Removing the Arcade will take away from Hillsborough as a community centre and goes against the stated aims of creating community neighbourhoods.

**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:**

I would like to see this developed as a mixed use area to include retail and housing.

**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