

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

### Respondent details

**Comment ID number:** PDSP.393.001

**What is your Name:** Sue22

**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 SP1: Overall Growth Plan

**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 following paragraph is unsound. "The Sheffield Plan will deliver: l) Protection, management and enhancement of designated blue and green infrastructure sites and assets. With a focus on the Green Network (including the Local Nature Recovery Network) and designated Urban Greenspace Zones (see policies GS1 to GS11)" The definition of the 'Green Network' refers to Map 17 however Map 17 is not a Green Network map, it is simply a map of existing green spaces and ecologically designated sites. Neither is it a green infrastructure map or network or strategy and does not show any opportunities for improving or strengthening any networks. This needs to be improved in line with the newly launched Natural England Green Infrastructure Framework and does not meet the requirement of para20 of the NPPF

“Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: d) conservation and enhancement of the natural, built and historic environment including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation” Green infrastructure is also included in Para92c) and 154a), 186 and 175 (see below) Definition on p67 of the NPPF “Green infrastructure: A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.” A South Yorkshire Green Infrastructure Strategy was produced in 2011 but this has not been referred to, or updated, and a local Sheffield version has not been produced following the guidance in the Natural England GI Framework and or the Building with Nature Standards for Local Plan policies Neither does the map and accompanying policy make reference to the ‘Access to Nature – capacity and demand maps’ which were developed as part of the South Yorkshire Natural Capital Maps (‘Holt, A.R., Zini, V. & Ashby, M. (2021) South Yorkshire natural capital and biodiversity mapping, Natural Capital Solutions Ltd, July 2021’). This is the most up to date and best quality evidence we have for access to nature and it not referenced. Also Map 17 does not include the Nature Recovery Network – this need to be separate. Justification – separation of ecological networks and their components to fully satisfy NPPF policies 174/175/179

**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:**

- “(l) Protection, management and enhancement of designated blue and green infrastructure sites and assets. With a focus on the Green Network (including the Local Nature Recovery Network) and designated Urban Greenspace Zones” Suggest changing to: • “(l) Protection, management and enhancement of blue and green infrastructure sites and assets including designated sites and Urban Greenspace Zones (see Map 17, policies map and policies GS1 to GS11) and the creation of new assets, especially where provision is low”
- Change the name of Map 17 to Blue and Green Infrastructure as it is not a network and may be confused with the nature recovery network– make the blue infrastructure clearer (waterways are not showing up as they are also LWS) and add opportunity sites. add new para as follows: • Identification, protection, enhancement and restoration of ecological networks: the Local Nature Recovery Network in line with the Local Nature Recovery Strategy/Nature Emergency Action Plan (GS5)

**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.393.002

**What is your Name:** Sue22

**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 SA2: Northwest Sheffield

**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 SA2: Paragraph 4.56. "The Rivelin and Loxley Valleys are popular areas for outdoor recreation, connecting the city to the large areas of attractive countryside before it reaches the Peak District National Park. This land is almost entirely designated as Green Belt." should be amended to include reference to the importance of nature conservation, biodiversity, landscape character and heritage for both of these valleys.

**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:**

Paragraph 4.56. "The Rivelin and Loxley Valleys are popular areas for outdoor recreation, connecting the city to the large areas of attractive countryside before it reaches the Peak District National Park. This land is almost entirely designated as Green Belt." should be amended to include reference to the importance of nature conservation, biodiversity, landscape character and heritage for both of these valleys.

**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.393.003

**What is your Name:** Sue22

**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:** 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:**

5.24 "Sheffield's blue and green infrastructure is important at all scales and is represented on Map 17". Unsound. As previously commented under Policy SP1 – Map 17 does not show Blue & Green 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:**

For the reasons outlined in Part 1, SP1, we suggest the following minor modifications  
Suggest adding "and the Nature Recovery Network" to the title  
Suggest changing:  
'Very significant weight will be given to the protection and enhancement of Sheffield's

Green Network of urban greenspace and countryside (including the Local Nature Recovery Network) especially,..' to: 'Very significant weight will be given to the protection and enhancement of Sheffield's Blue and Green Infrastructure and Local Nature Recovery Network, especially...'. Suggest addition "Valuable greenspaces will be protected from inappropriate built development and are shown on the Policies Map as either Urban Green Space Zones (policy GS1), Greenbelt (GS2) or designated ecological or geological sites (GS5)" Suggest addition 'New high quality green infrastructure that meets standards\* is encouraged' \*Such as "Building with Nature" Add "the conservation of heritage assets" to the list of benefits (first paragraph); Add "and their associated waterpower infrastructure" to the list of main river corridors; Add "registered parks and gardens" to the list of key elements of the Green Network. On page 103, Policy BG1, Rivelin is included in the list of main river corridors, and should be added to the list of 'major parks and green spaces of city-wide importance for recreation and/or biodiversity". Part 1, Map 17 on p110 Add locations of registered parks and gardens.

**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.393.004

**What is your Name:** Sue22

**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:** 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, and to increase the level of conservation protection where sites qualify. 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)).

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:**

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. 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.

The Plan should be more ambitious in defining and developing new wild and green spaces. It should also aim to increase the level of conservation protection – for example it is accepted that some of the Local Wildlife Sites in Rivelin Valley could be given national recognition with Local Nature Reserve status.

Specific objectives should be included to make green spaces that are primarily for sport and recreation better for wildlife alongside retaining and enhancing their wider recreational value.

The Plan needs to be more ambitious and prescriptive regarding the specified width of the buffer zones alongside rivers and streams 20 metres seems would be more appropriate.

Greater ambition is needed for i.e. much closer to Natural England's nationally accepted standards for Accessible Green Space. However, 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, for example the Rivelin Valley Nature Trail, 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.393.005

**What is your Name:** Sue22

**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:** 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:**

Whilst the tone is positive it is only descriptive. It gives the impression that the green network is more or less already complete and that the function of policy is to 'safeguard and enhance' what is already available and accessible. There is little suggestion that this is a dynamic and very much unfinished ambition, with the useable and better managed network at present mainly available in the more favoured parts of the city but much less so in others. The accompanying map 17.5.25 simply records what is there now with no indication of how rivers or greenspaces could be improved for biodiversity or human benefit by better connectivity and restoration or of any current initiatives.

Nor is there much suggestion that the network might have other important benefits for active travel, flood management, water quality, stewardship, tourism, physical and mental health, new investment, not to mention enhancing the setting for the proposed re-densification of the inner city which is the overwhelming driver for this plan.

#### Policy Plans

The main Policy Plans show a similar lack of focus on the green-blue corridors. Existing public access to waterways is only patchily and inconsistently shown, mainly only when it is considered to be a cycleway. There is no acknowledgement of the many valuable and hugely well-used riverside walking trails which are often promoted and looked after by willing volunteers

#### Character Areas

The Character Area policies, especially for the city centre, are a section where one might expect to see positive references to the various emerging river trails and parkways.

Policy for Area CA1: Kelham Island, Neepsend, Philadelphia, Woodside, whilst referring in general terms to opportunities for green-blue space, cycling and walking and a possible new riverside park, does not mention the existing Upper Don Trail, does not show it on the accompanying plan, does not show how it links to its proposals and does not highlight the potential of the Trail to link this top priority housing area via largely off-road routes to nearby greenspace at Wardsend, Parkwood, Beeley Woods and the open countryside via the trail. This seems to be an extraordinary omission, but it is reproduced in the treatment of areas along the Upper Don at Oughtibridge and Deepcar, on the Lower Porter at City Arrival And Moorfoot and on the Lower Sheaf.

### **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:**

Existing or proposed river trails should be mentioned by name -eg Five Weirs Walk, Canal Towpath, Porter, Shirebrook, Rivelin Valley, Loxley Valleys, River Sheaf Trail, Upper Don Trail, Moss Way, Blackburn and Charlton Brook, Hartley Brook/Tongue Gutter, Meersbrook, Carbrook etc.

Sections of the Porter Trail, Upper Don Trail and River Sheaf Trail required by current planning conditions, and in some cases currently under construction, should be shown on the Policy Maps, to avoid sending out a weak and confusing message to future developers of adjoining sites.

A section of the Five Weirs Walk between Washford Bridge and East Coast Road, temporarily closed awaiting repairs is simply omitted and an unsatisfactory diversion is shown – this should be changed to show the plan for the future.

Existing public access to waterways should be shown consistently. For example, the many valuable and hugely well-used riverside walking trails which are often promoted and looked after by willing volunteers should be shown on the map and acknowledged in the text.

The Character Area policies, especially for the city centre, should include positive references to the various emerging river trails and parkways.

**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.393.006

**What is your Name:** Sue22

**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. Modifications are needed to policy ES1 in order to meet the objective of environmental sustainability (NPPF 8(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 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 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.393.007

**What is your Name:** Sue22

**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 GS3: Landscape Character

**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 the supporting Document "Preliminary Landscape Assessment 2015" the Rivelin Valley is shown within the Area defined as VA3 Pastoral Upland River Valleys. Although the three categories - Upland, Valleys and Lowland in Policy GS 3 do not coincide with the descriptions in the Landscape Character Assessment it is assumed that the Rivelin Valley falls within the Policy GS3 categories. The Indicative Maps in the Assessment do not show precise boundaries and also, on the Maps for the North West (Map 7) and South West (Map 12) Sub Areas no boundaries are shown for the areas indicated in Policy GS 3. This also applies to the interactive Policy Map. It is therefore difficult to see how, in certain situations, Policy GS 3 could be used in the determination of planning applications. The current statutory Planning Policy GS 8 in

the Unitary Development Plan defines precisely Areas of High Landscape Value and this has proved very useful when the Rivelin Valley Conservation Group has submitted comments on relevant planning applications.

**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:**

In order to define the Areas to which Policy GS3 applies the precise boundaries of these Areas should be defined on the Policy Maps for the North West Sub Area (Map 7) and the South West Sub Area (Map 12) and also on the interactive Policy Map

**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.393.008

**What is your Name:** Sue22

**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:**

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).

**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.

**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.393.009

**What is your Name:** Sue22

**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:**

Although examples (including 'swift bricks') are given in the 'Definitions' box, there is no clear expectation of the extent to which these will be required. For example several UK Red list bird species – swifts, house sparrow, startling and house martins can benefit from the inclusion of cheap swift bricks in all new builds. Integrated bat tiles or bricks are also very affordable and should be standard. Justification NPPF para179 "Plans should" b) "...and the protection and recovery of priority species" [www.gov.uk/guidance/natural-environment#green-infrastructure](http://www.gov.uk/guidance/natural-environment#green-infrastructure) Paragraph 023 Reference ID: 8-023- 20190721 [www.gov.uk/guidance/natural-environment#biodiversity-geodiversity-and-ecosystems](http://www.gov.uk/guidance/natural-environment#biodiversity-geodiversity-and-ecosystems) Paragraph: 012 Reference ID: 8-012-20190721

**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:**

a) And j) Addition 'and South Yorkshire Local Nature Recovery Strategy/Sheffield Nature Emergency Action Plan' e) "Prevent the loss of" Suggest changing to: must include enhancements for the protection and recovery of priority species. - development of all new dwellings must include swift bricks or other bird roosting opportunities and bat bricks/tiles and passage for hedgehogs. - riparian development should include enhancement for riparian species (including bats, otter, kingfisher) depending on how close the development is (due to buffers) Suggest amendment to l) (and or the definition of Design features to enhance biodiversity): Design features to enhance biodiversity and create opportunities for species could include green and brown roofs, street trees, native shrubs, hedgerows and wildflowers, bird boxes or platforms, swift bricks, bat boxes, bat bricks or tiles, hedgehog holes...

**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.393.010

**What is your Name:** Sue22

**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 GS9: Managing Flood Risk

**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:**

8.30 "In Sheffield, the risk of flooding comes from both rivers and surface water. Managing the risks is one of the most important ways of adapting to a pattern of more intensive rainfall events that is predicted as a result of man-made climate change and global warming." Unsound – lack of clarity

8.31: "It is vital that development slows water from entering the main river systems and that sensitive uses are not developed in the areas with the highest risk of flooding. But where development does take place in areas at risk of flooding it must implement a range of mitigation measures to reduce the extent and impact of flooding." Unsound Separate out slowing the flow from developments and avoiding areas of high flood risk into two separate points. Tributaries feed into the 'main rivers'

and need to be explicitly included, plus slowing all drainage needs to be included to avoid complete hard surfacing and drainage of some areas. Important to get sewers/drainage systems in to address the Combined Sewer Overflow (CSO)s risk, especially if more development is being linked to the network

**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:**

8.30. Clarification needed on terminology as Surface Water in EA/WFD terms means, rivers, ponds lakes and transitional water not rainfall on hard surfaces as implied here

Suggest minor modification to wording as follows: 8.31 “It is vital that development slows water where attenuation of the of the development area is to be altered/increased to ensure that water is slowed from entering the main rivers and their tributaries.” “It is vital that sensitive uses are not developed in the areas with the highest risk of flooding”. But where development does take place in areas at risk of flooding it must implement a range of mitigation measures to reduce the extent and impact of flooding.” Remove this section as it is incompatible with GS9 a)-e) Include position on Flood Zones 1 and 2 here or in GS9.

**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.393.011

**What is your Name:** Sue22

**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 GS9: Managing Flood Risk

**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:**

Flood Risk Management for Development Sites “New Development will be permitted where... a) Is set back from any watercourse (and/or any flood defences on the site) to allow for future maintenance and biodiversity: • For Main Rivers as agreed with the Environment Agency but a minimum 8m from top of the bank and any flood defences on the site) either side • For ordinary watercourses as agreed with the LLFA but a minimum of 3m from top of the bank (and any flood defences on the site) either side; “

8. Unsound - All main Rivers in Sheffield are key ecological corridors and are designated as Local Wildlife Sites so should be adequately protected and buffered. NPPF 174b) “minimising impacts on and providing net gains for biodiversity,

including by establishing ecological networks that are more resilient to current and future pressures' and 174e "preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans" Suggest 8m is too little to ensure this based on the Environment Agency response in relation to a Planning Appeal for a site in the Loxley Valley in Sheffield (Appeal APP/J4423/W/20/3262600 ) where the Environment Agency stated "a minimum undeveloped 10 metre wide buffer zone alongside the River Loxley..... The buffer zone scheme shall be free from built development including lighting, domestic gardens and formal landscaping"

**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:**

Increase buffer to 20m where feasible. Guidance/policy needed about demolition and replacement or redevelopment of existing buildings which currently do not have a buffer to the river. Suggested addition on policy point "For sites containing buildings with a smaller buffer to the rivers – replacement buildings should be set back as per this policy. This will not apply to refurbishing buildings of heritage 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.393.012

**What is your Name:** Sue22

**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 GS9: Managing Flood Risk

**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:**

“c) minimised culverting and no building over open watercourses wherever practicable; and” 8. Unsound. Weak wording

**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 replacing with “Avoids culverting of and building over open watercourses including ephemeral watercourses, and avoid changing groundwater pathways”. Add in “Overland water should be retained on the same flowpath after development and not diverted into the drainage and sewer network”

**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.393.013

**What is your Name:** Sue22

**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 GS10: Protection and Enhancement of Water Resources

**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:**

Protection & Enhancement of Water Resources 8.34-8.36 and GS10. Can SCC add supporting text or policy wording to continue these commitments if the WFD requirements are repealed from UK Law as a result of Brexit and not replaced with the same or a higher level of legal requirements. "GS10 Protection and enhancement of Water Resources New development must support the objectives of the Water Framework Directive and Humber River Basin Management Plan."  
"c) not increase the risk of any pollution entering a nearby water body through water run-off or discharge resulting in harm or deterioration to the aquatic ecosystem and any drinking water supplies; Requires reference to impact to water quality. E.g.

Microplastics don't directly impact aquatic ecosystems, but are covered in water quality.

**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 minor amendment "New development must support the objectives of the Water Framework Directive and Humber River Basin Management Plan – even if these objectives are no longer required by law during the lifetime of the plan. New development should also support the objectives of the Don & Rother Catchment Management Plan and the Sheffield Waterways Strategy.

c) Suggested minor amendment "...to the aquatic system, to water quality, and any drinking water supplies;"

**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.393.014

**What is your Name:** Sue22

**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 DE8: Public Art

**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 DE8 encourages new public art in development, but does not directly address public art that already exists. Some artworks are heritage assets, but some are newer works, and many have little or no protection. Financial contributions in lieu of public art are sometimes allowed, which can result in fewer artworks when these are pooled. Provision is needed to follow national guidance in the treatment of statues and other commemorative objects and of contested heritage, but this is missing. Modifications are needed in order to meet the objective of social sustainability (NPPF 8(b)), to make sufficient provision for the conservation and enhancement of the natural, built and historic environment (NPPF 20(d)), to ensure that developments

are sympathetic to all aspects of local character and history (NPPF 130(c)) and to incorporate protections for commemorative objects (NPPF 198)

**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 DE8 should be amended so as to ensure the retention or sensitive relocation of existing artwork, reinstate previously removed artworks, reflect national policy on statues and commemorative objects, incorporate Historic England guidance on contested heritage, and ensure that the largest possible number of developments incorporate locally distinctive artwork by allowing finance in lieu only as a last resort

**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.393.015

**What is your Name:** Sue22

**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:**

There should be provision for the proactive identification and designation of new Conservation Areas in order to comply with the Planning (Listed Buildings and Conservation Areas) Act 1990 s69(1). In particular, the Castlegate area, already identified by the Council as of special architectural or historic interest and appraised for designation, should be designated, and its proposed designation reflected in the plan.

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 merit 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. Note that map 6 Heritage Assets is already out of date in that many sites, including all of the waterpower sites in the Rivelin Valley, have been locally-listed and added to the South Yorkshire Heritage List since the map was created. Modifications are needed in these respects to make sufficient provision for the conservation and enhancement of the natural, built and historic environment (NPPF 20(d)) and 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 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, including Castlegate.

Modification needed to text and Map 6 Heritage assets to include sites that have been recently locally listed sites and reflect that many others are currently candidates for listing (<https://local-heritage-list.org.uk/south-yorkshire>).

**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.393.016

**What is your Name:** Sue22

**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:**

Policies Map

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

N/A

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

Safeguarded for Flood Storage

### 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:**

On the Policies Map, an area in the Rivelin Valley is shown as "Land that is Safeguarded for Flood Storage". This designation would require the building of a significant embankment across the valley, and associated infrastructure, that would have a major adverse impact on the biodiversity, public recreation, heritage and landscape. The option of an embankment in this location raised significant local opposition when it was first put forward in 2016.

**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 area of "Land that is Safeguarded for Flood Storage" in the Rivelin Valley should be removed from the Plan. This designation would require the building of a significant embankment across the valley, and associated infrastructure, that would have a major adverse impact on the biodiversity, public recreation, heritage and landscape. The option of an embankment in this location raised significant local opposition when it was first put forward in 2016.

**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