

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

Respondent details

Comment ID number: PDSP.099.002

What is your Name: LesS

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

CPRE Peak District and South Yorkshire

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: 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 Plan is based on a vast amount of strategic and local knowledge and detail and supported by up to date technical assessment and expert in house and commissioned evidence and analysis. The Plan is Sound, positively prepared, consulted upon in line with all requirements including the LDS, justified in relation to all the evidence available, effective in delivering the growth needs of the City and consistent with National Policy, and indeed emerging changes proposed to the NPPF and Local Plan regulations.

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):

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:

We would only wish to appear in sessions regarding areas of the Plan which we consider fall short in delivering sustainable travel, and climate change action, or if proposals emerge that would change the green belt beyond the current change at Norton Camp

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to support more ambition on certain policies

From: [REDACTED]
To: [REDACTED]
Subject: CPRE Peak District and South Yorkshire to the SCC Plan
Date: 17 February 2023 15:18:39
Attachments: [CPRE PDSY SCC Plan Response.docx](#)

Please find attached the response from CPRE Peak District and South Yorkshire to the SCC Plan
Kind regards,

Tomo Thompson
CEO
CPRE Peak District and South Yorkshire
Tel: [REDACTED]

CPRE PD&SY are exceptionally busy at the moment. Please bear with us. Thank you.

Website - www.cprepdsy.org.uk

Twitter - [@cprepdsy](#)

Instagram - [@cpre_pdsy](#)

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Peak District and
South Yorkshire

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17 February 2023

SHEFFIELD PLAN: OUR CITY, OUR FUTURE

PUBLICATION PRE-SUBMISSION DRAFT

December 2022

RESPONSE OF CPRE PEAK DISTRICT AND SOUTH YORKSHIRE

1. Background

CPRE-PDSY are the local branch of CPRE, The Countryside Charity. We have been protecting Peak District and South Yorkshire landscapes since 1924. We represent the Campaign for National Parks in our role as Friends of the Peak.

We thank Sheffield Councillors and officers for meeting with us in January to discuss details of the Draft Plan, and in providing explanation and answers to our queries.

Sheffield Council published its Draft Sheffield Plan for Statutory public consultation 9th January to 20th February 2023.

The new plan will guide the future of the city by setting out the vision and policies for how and where development will take place up until 2039.

The Publication Draft Sheffield Plan includes several documents:

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CPRE Peak District and South Yorkshire

for the countryside, for communities, for the future

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

Part 2: Development Management Policies and Implementation.

Annex A: Site Allocations.

Annex B: Parking Guidelines.

Key Diagram.

Policies Map (digital map only)

2. Response

2.1 The Draft Plan includes a vast amount of strategic and local site detail supported by many background and supporting documents, up to date technical analysis, expert in house and commissioned assessment and evidence. The City Council has taken its legislative obligations thoroughly, responsibly, in a balanced way and with proper and full public involvement, albeit there has been a more extended time-scale for preparation than we would have wished.

2.2 CPRE-PDSY consider the Plan to be a SOUND Plan and that it has been positively prepared, is justified in relation to the available evidence, is effective and is consistent with National Policy both current and now emerging through a revised NPPF and primary legislation.

2.3 We have responded to the Council's on-line portal, and are also submitting these written comments.

2.4 We strongly endorse the Councils **overall strategic approach** which is for a compact sustainable City, that meets its housing and employment land requirements within the current urban area, and largely on brownfield sites. This will protect the City's cherished green space, biodiversity and countryside, support more sustainable modes of transport aligning new development with sustainable transport infrastructure, maximise the use of existing services and infrastructure, enliven and improve the City Centre, and help tackle the challenges of the Climate Crisis.

2.4 There is a significant need for **new housing** in Sheffield and this urgently needs to include more affordable housing than is currently being achieved. The quality and variety of homes needs to be higher too. We applaud the Council's 'Capacity Led' approach which reflects local circumstances including the City's constrained geography and valued green environment, but still seeks to deliver sufficient housing to meet the City's economic growth ambitions and more than sufficient land for that which housebuilders realistically can and will deliver. The constraints of the

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City's size, and other important policy needs, together with a sufficiency of housing land across the Sheffield City Region make arbitrary housing need impositions both unnecessary and undeliverable.

2.5 We support the intention to facilitate delivery of primarily brownfield new housing, focussed in and around the City Centre. The Plan recognises that to make this ambition deliverable there will be a need for masterplanning, site assembly, infrastructure improvements and engagement with a wider range of potential housebuilders. We are encouraged by fuller involvement of Homes England in assisting delivery. The Council will need to be active and persistent in creating new markets for additional housing and creating the setting for improved viability.

2.6 We support the Council's determination to deliver **more affordable housing**, through a modest initial uplift in the requirements being placed on housebuilders. Regrettably this will be limited by viability and not be enough. The Council will need to regularly update its requirements as viability and delivery improve. The Government also needs to provide substantially more support for Councils to deliver the affordable housing that people urgently need.

2.6 We support the proposals to increase **carbon reduction requirements** for new housing in stages to meet neutrality by 2030. But again there is only so much that Local Authorities can do on their own. Government needs to take stronger ownership and require faster change through Building Regulations to help tackle the Climate Emergency.

2.7 We support policies **ES1-8** but whilst the Council's overall ambition for net zero carbon by 2030 is applauded, the Local Plan alone will only deliver limited reductions through its policies on new development, sustainable travel and biodiversity net gain. The proposed wind turbine plans are insufficient and need extending, and ground source and air heatpumps should be encouraged in policy. It will be essential that City and City region wide action is taken to increase renewables, improve the performance of existing housing and business premises, and increase active and sustainable travel. We are encouraged that the Council is also engaging with partners to achieve more, and this will be more important than simply having the right LP policies if climate change is to be tackled.

2.8 More **sustainable and active travel** will be encouraged by the overall spatial strategy for a compact and higher density City, and we support **Transport Policy T1**. However we are very concerned that the Plan does not go far enough in creating a fully comprehensive network of joined up and safe active travel routes. The current fragmented network needs to be denser and more complete, and commitment and delivery needs to be substantially increased over what we have seen in recent years. Public transport needs to be improved significantly in offer,

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affordability and reliability and the present decline halted. We are encouraged that working across the City Region some plans to regulate are proposed, but again resources appear to be limited in terms of significantly reducing need for use of the car. All means should be used to achieve mode change. We are also concerned that the better public transport needed to connect all Sheffield people to the benefits of its protected countryside and National Park land and to connect those living and working in the countryside to services in the City does not exist, and appears to be ignored in the Plan. There needs to be a plan for electric vehicle charging and secure cycle parking City wide, not just in new development

2.9 The Draft Plan highlights the need for a high quality of built development and urban and green spaces. These together with supporting services and infrastructure will be essential to create a more liveable and enjoyable City which is compact and sustainable, and an emphasis on the **quality of design** across all new development is needed.

2.10 Biodiversity net gain requirements **GS6** are unclear. Biodiversity and carbon sequestration will be required from the end of 2023, but achieving 10% in new development will not achieve the stated ambition 10% for the City as a whole. How is this to be achieved?

2.11 We strongly endorse the Councils **retention of the Green Belt**, and accept removal of current noted anomalies, and the release of the brownfield and derelict Norton Aerodrome. The importance of cherished greenspace and countryside on peoples doorsteps is of increasing value for people's well being, and for tackling Climate Change.

2.12 We strongly support the retention of additional greenspace at **Owlthorpe** that the local community has long fought for. Similarly the protection of some remaining greenspace at **Hollin Busk** is welcome, and the partial allocation of the site at **Wood Royd Lane** as local 'urban greenspace' so that it must be retained is recognition of the site's environmental value and it's importance to local people. But we consider that the whole site should be allocated as a Local Greenspace.

Yours sincerely



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Tomo Thompson
Chief Executive

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