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Subject: Sheffield Plan: Our City, Our Future - Publication (Pre-Submission) Draft. Consultation Response by Friends of the Loxley Valley
Date: 19 February 2023 10:54:58
Attachments: [FoLV Sheffield Local Plan submission February 2022 \(FINAL\).docx](#)

Dear Sir/Madam

Please find attached comments by Friends of the Loxley Valley on the 'Sheffield Plan: Our City, Our Future – Publication (Pre-Submission) Draft'.

Please note that we would wish to participate in the Planning Inspector's hearing sessions on the draft Sheffield Plan.

Sincerely

Stewart Kemp

Secretary

Friends of the Loxley Valley

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Sheffield Plan: Our City, Our Future – Publication (Pre-Submission) Draft
Consultation Response by Friends of the Loxley Valley

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Introduction

Friends of the Loxley Valley (FoLV) is a local community group that exists to help to care for the Loxley valley, to showcase its wonderful qualities, and when necessary to protect and defend it. FoLV currently has 135 members, who mostly live in or around the Loxley valley.

FoLV broadly welcomes the 15-year strategy set out for the city in the Sheffield Local Plan. We support the vision of a compact sustainable city that meets its needs without succumbing to further urban sprawl and sacrificing swathes of Green Belt countryside.

This vision squares with the city's ambition to develop its identity as "The Outdoor City", and with the city council's declarations of both Biodiversity and Climate Change Emergencies.

Sheffield is unique among British cities in having so much of its land mass within a national park. Indeed, the city extends to some of the wildest, most deserted moorland in the Peak District, and within the wider UK. Some of the most remote moorland lies around the head of the Loxley valley on the Bradfield, Strines, Derwent and Ughill Moors. The upper half of the Loxley valley – west of Dungworth, Damflask and Holdworth – lies entirely within the planning jurisdiction of the Peak District National Park Authority.

How the Local Plan relates to the Loxley valley

The Sheffield Local Plan policies for the Loxley valley need to be viewed within this national park landscape context. The lower half of the valley – within the jurisdiction of the Sheffield Local Plan – forms a vital "gateway" to the national park. It links the city to the Peak District through its landscape and settlement character, through its transport links, through its recreational and biodiversity corridors and in many other important ways. Beyond the concentrated suburban settlements of Loxley and Stannington, the valley landscape of ancient lanes, upland fields and pockets of woodland is virtually indistinguishable from the national park landscape that adjoins it. The countryside within the two neighbouring planning jurisdictions is in most respects an integrated

whole that warrants integrated protection and stewardship. This should be reflected in the Local Plan.

The Area of High Landscape Value previously applied under the UDP to the Green Belt bordering the Peak District has been removed, but some equivalent protection for this very sensitive and beautiful area should replace it. We have the same concern about the removal of the Area of Special Character status under the UDP, which acknowledged the vernacular stone architecture, the industrial heritage of water power in the valley and other important features. These character features of Sheffield's industrial heritage and villages still need designated protected status, or upgrading to Conservation Areas, before more is lost to piecemeal development. We note that this point has been made in the separate submission by Joined Up Heritage Sheffield, which we refer to later. JUHS argue that the draft Plan is unsound in failing to make provision to protect the former ASCs.

The characteristics of the Loxley valley were key in a planning appeal decision in 2021 (Appeal Ref: APP/J4423/W/20/3262600) to reject a proposed 300 dwelling redevelopment of the redundant old Hepworth factory buildings in the heart of the valley. In her evidence to the appeal inquiry, the city council's expert ecological witness, biological consultant Dr Helen Barber, described the Loxley valley as "Sheffield's most rural valley in character, habitats and locations". She said it was "an ecological gem of Sheffield – largely due to its connectivity and minimal human disturbance over the last few decades". In the same Proof of Evidence, the city's Biodiversity Officer Chris Smith said that "the woodland and trees along the course of the River Loxley are a major ecological asset". In his decision to reject the planning application, the Planning Inspector Martin Whitehead ruled that the Loxley river valley acts as a "Green Corridor" with important qualities that "require safeguarding".

The Sheffield Local Plan policies, as applicable to the Loxley valley, need to be considered within this Outdoor City and national park gateway context. The dominant, overriding feature of the policies as shown on the interactive online Sheffield Plan Policies Map, is the continuation of a tightly drawn Green Belt beyond the existing intensively developed conurbations of Loxley, Malin Bridge, Stannington and Wisewood. The whole of the valley bottom along the River Loxley, plus the adjoining woodland on the south side of the valley, is designated on the map as having Local Wildlife Site (LWS) status. There are also areas of designated LWS on the higher southern flanks of the valley, to the west of Stannington, along Load Brook, and around Dungworth. The Policies Map also recognises SSSI sites at Stannington Ruffs and Studfield Hill, and the statutory Nature Reserve status of Wadsley and Loxley Commons (which also enjoy LWS status and include a Geological SSSI).

FoLV welcomes this emphatic continuation of extensive Green Belt and LWS status and protection. It forms an important baseline of policies for the future of the valley, but we feel it needs additional protection to this, as we will outline later in this submission.

We also welcome policy D1 in Part 1 of the Local Plan, which deals with "Design Principles and Priorities". Policy D1 says development should respect, take advantage of, and enhance the city's rural setting, topography and landscapes. It makes clear that this includes "the distinctive landscape of river valleys, dramatic hillsides, extensive tree cover and views out to Sheffield's Peak District setting".

Protecting biodiversity and promoting nature recovery from the current state of emergency

Whilst we welcome the above policies, we have reservations about policy GS5 and paragraphs 8.18 to 8.23 of the Plan (Part 2). These place the enhancement and connection of wildlife sites within the scope of a Local Nature Recovery Strategy and a Local Nature Recovery Network that have yet to be formulated. Given the urgency of the city's declared "Biodiversity Emergency" (Plan Part 2, paragraph 8.1), we would urge the city council to articulate these nature recovery policies in the Plan, so that people have a clear understanding of the part to be played in their local environment.

As stated above, we welcome the continuation of the Local Wildlife Sites that apply to the valley. But we note that policy GS5 affords a lower level of protection to Local Wildlife Sites than it does to the statutory Special Protection Areas, Special Conservation Areas, SSSIs and Nature Reserves. We have already quoted from the ecological evidence presented to the recent planning inquiry by Dr Barber. Elsewhere in her evidence, she said the valley bottom adjoining the old factories was "an area of exceptionally high ecological value for Sheffield". She went on to say that "the wildlife in this section of the river valley is exceptional for Sheffield, due in no small part to the lower human disturbance".

We believe that an exceptional place warrants exceptional protection. We would like to see LWS 108 "Loxley Valley: Damflask to Rowell Bridge" drawn more tightly around the developed footprint of the old factory buildings. The rationale for doing this flows from Dr Barber's planning evidence, cited above, and also from Chris Smith's assertion to the inquiry that "the Hepworths site is going through the process of being reclaimed by nature and blending back into the surrounding woodland".

Given the "exceptional ecological gem" status of the valley, we also believe there is a strong case for revisiting the level of protection afforded to the river corridor. There is a strong case for raising this above the non-statutory Local Wildlife Site level. We would like to see a commitment to considering this as part of the Local Nature Recovery Strategy and Local Nature Recovery Network that are referred to in paragraphs 8.20 and 8.21 of Plan Part 2. This should be reflected in the Local Plan.

Protection from inappropriate development

The Local Plan Part 2 policies for Green Belt (policy GS2) and Biodiversity (policy GS5) are intertwined with Part 1 policy BG1 Blue and Green Infrastructure. Policy BG1 defines Sheffield's Green Network of urban green space and countryside and gives very significant weight to its protection and enhancement. The River Loxley is specifically identified as a main river corridor, and a valuable green space that will be protected from inappropriate built development. We welcome this.

The River Loxley is also identified as a defining feature of the Northwest Sub-Area that is defined by Part 1 policy SA2. Paragraph 4.56, which helps to explain policy SA2, describes the Loxley and neighbouring Rivelin valleys as "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." Policy SA2 defines the sites that have been defined for housing in the Northwest Sub-Area. These are mainly located in the Upper Don Valley, which benefits from long established centres of population and strong sustainable transport links. We support this approach. We also note that the redundant Hepworth factory site, referred to earlier in this submission, is excluded from the housing site allocation. We strongly support this. The 2021 planning appeal ruled that major development on this inherently unsustainable site would cause

substantial harm. Development of the site on any scale should only be contemplated now if it can demonstrably enhance this corridor of exceptionally sensitive countryside, and if it can demonstrably achieve exceptionally significant biodiversity net gain.

Policies BG1 and SA2 both refer to the opportunities for outdoor recreation in the city's green corridors. The demand for outdoor recreation is especially significant in the Loxley valley, because of its exceptional links to the national park. We support sustainable outdoor recreation opportunities, but we would welcome recognition in the Local Plan of the potential tensions between human activity and biodiversity. Given the nature emergency declared by the city council, we would welcome an explicit recognition in the Local Plan that the interests of biodiversity should hold sway over inappropriate recreational pressures.

The Sheffield and Rotherham Wildlife Trust (SRWT) has submitted a detailed response to the Local Plan that argues for the vigorous proactive reversal of the decline in local biodiversity and the rigorous refusal of inappropriate development. We support the SRWT submission, especially the aspects of it that relate to the river valleys, and specifically the recommendation of a more substantial buffer zone of a minimum 10m increasing to 20m where this is achievable between any development and any main river. This accords with Environment Agency evidence to the 2021 Hepworth site planning inquiry

Changes to the suburban fringe of the Green Belt

The interactive online Sheffield Plan Policies Map shows the proposed removal from the Green Belt of several sites on the edge of the built suburban conurbation, presumably because they have recently been developed. These are the Lidl site at the bottom of Stannington Road, Forge Valley School and the former college site surrounding Chapman Close (off Wood Lane), and a sliver of land off Greaves Lane near the bottom of High Matlock Road. FoLV would urge continuing Green Belt designation of these sites. Continuing Green Belt designation would protect the sites from further, more intensive, development that could lead to overdevelopment of the sensitive urban fringe, (as is the case with the recently developed "Dyson" site along Linnet Way and Skylark Close, off Stopes Road at Stannington, which remains within the Green Belt).

The interactive map also shows two slivers of land that are proposed as additions to the Green Belt. These are to the north of Acorn Drive and Robin Hood Chase, on the Acorn Hill housing estate at Stannington. FoLV welcomes these additions, especially as the two sites adjoin a woodland which is both a Local Wildlife Site and a Geological SSSI. Presumably their previous omission from the Green Belt was an oversight.

The Local Plan and local heritage

The Loxley valley contains a huge array of heritage features. Myriad dry stone walls and gate posts, hewn from local materials, stamp their identity across the dominant network of field systems. The wider landscape features the vernacular architecture of local farms and rural settlements. The river corridor contains a remarkable string of historic water power features that survive as an interconnected system running the length of the valley. Throughout the valley there are remains associated with the quarrying and mining of ganister and fireclay and the manufacture of refractory bricks for the steel industry. This legacy of continuing human innovation contributes hugely to the

character of the valley and its countryside, which the Local Plan aspires to protect through the policies dealt with above.

FoLV and its predecessor organisations – the Loxley Valley Protection Society and the Loxley Valley Design Group – have also done much to try to define and protect local heritage.

The Loxley Valley Design Statement dealt with heritage in substantial detail, and key guidelines were adopted by Sheffield City Council as supplementary planning guidance. The Local Plan should carry this guidance forward as policy, (see below).

FoLV submitted a detailed supplementary objection to the Hepworth factory planning application to the city council, ref 20/01301/OUT. In this objection, we outlined the significant heritage and habitat assets that would have been affected by the proposed development.

Since then, we have submitted a “whole valley” water power heritage asset submission for inclusion on the South Yorkshire Local Heritage List. This submission is pending approval at the time of writing this representation, (a parallel “whole valley” submission for the neighbouring Rivelin valley has already been approved). FoLV and its sister organisation, the Rivelin Valley Conservation Group, have also held exploratory meetings with the aim of achieving joint Conservation Area status for the remarkable water power assets in both valleys. These include several nationally listed buildings and structures in the Loxley valley, and Scheduled Ancient Monuments at Low Matlock, and at Mousehole Forge in the Rivelin valley.

The Local Plan deals with heritage in Part 2, Policy DE9 “Development and Heritage Assets”. FoLV welcomes the commitment in policy DE9 to secure and enhance locally listed structures, sites and landscapes and other non-designated heritage assets. Policy D1, in Part 1 of the Plan, also places local heritage at the heart of the city’s “Design Principles and Priorities”, and it makes specific mention of the city’s water powered industries. We welcome this too. Both these policies have been welcomed and supported in a response to the Local Plan that has been submitted by Joined Up Heritage Sheffield (JUHS). FoLV is one of the many local community groups who contribute to JUHS meetings and policy formulation. FoLV unreservedly endorses the JUHS submission on the Local Plan. Regrettably, we share the JUHS view that the overarching policies in D1 and DE9 do not carry through to detailed and explicit protection for heritage assets, especially those associated with the city’s river valleys and water power. We would like to see much more rigorous proactive policies to protect, enhance and promote the city’s heritage. The points we would wish to make are made in much greater detail by JUHS, including the importance of protecting Areas of Special Character as defined by the UDP, (the Loxley valley was one of them), and the vital importance of the policies set out in the Sheffield Waterways Strategy, agreed by the Council and Environment Agency, but inexplicably omitted from the current iteration of the draft Plan.

Continuation of Loxley Valley Design Statement policies

We have referred above to the supplementary planning guidance that derives from the Loxley Valley Design Statement. The Design Statement followed an extensive local consultation process in the early years of this century. Its planning guidelines hold good, and the character of the valley has not changed materially since they were drawn up. We believe they should be carried forward as saved policies on the adoption of the new Local Plan.

Map quality

The city council has kindly provided FoLV with a paper copy of the North West Area Map, which accompanies the Sheffield Plan. We requested this so that we could compare it with the earlier UDP map. It was obvious that the maps were very different not only in style but also in quality. On the UDP map, there is a great deal of geographical detail, showing where buildings, farmsteads, small settlements, roads, lanes, and footpaths are, in relation to the planning area boundaries. This is important when there is a need to see whether a particular small feature is within a particular planning area. Unfortunately this information is not present on the paper version of the Sheffield Plan Map. If this is the detail that is going to be on the final version, someone with just a paper copy cannot tell whether a particular site is within a designated area of land or outside it. We acknowledge that the interactive online version of the map carries more detail, (although not public rights of way). But it should be borne in mind that not everybody will consult the digital version – if this was the case, there would be little point placing paper copies of the map in local libraries as reference documents.

Joined up Heritage Sheffield in Appendix A of their submission, have made detailed comments on the quality of the interactive online version of the new map. We support these JUHS comments.