Respondent details

Comment ID number: PDSP.121.002

What is your Name: Fran H

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

Regather

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

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

Which section of the document is your representation on:

Chapter 2: Vision, Aims, and Objectives

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

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

Whilst the draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

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 ADDITION

The city's resilience to the effects of climate change, biodiversity loss and geopolitical instability negatively impacting the food system will be achieved by protecting land capable of producing food.

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft)

"Future access: safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

Protecting soil, improving soil quality, and maintaining carbon storage in soil Improving and enhancing biodiversity

Increasing food supply resilience against climate and economic events

Reducing food miles and food waste

Supporting plant genetic diversity

Reducing urban heat island effect

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

"Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate." (Paragraph 98).

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:

Respondent details

Comment ID number: PDSP.121.003

What is your Name: Fran H

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

Regather

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

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

Which section of the document is your representation on:

Chapter 2: Vision, Aims, and Objectives

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

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

Whilst the draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

SUGGESTED ADDITION

*** to safeguard land capable of producing food, in recognition of the local food system's fundamental role in both providing nutrition for a healthy population and as a cornerstone of a resilient economy - one that is less vulnerable to geopolitical and climatic instability - and where public procurement purchasing power is used to reward the most sustainable farming practices.***

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft)

"Future access: safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

Consider whether the council should adopt a range of sustainable standards for our internal catering including, for example, meat and dairy reduction, locally grown, reduction in single use plastic, reduction in food waste"

SUPPORTING INFORMATION 2

National Food Strategy - The Plan: Recommendation 13 -

"Strengthen Government procurement rules to ensure that taxpayer money is spent on healthy and sustainable food."

SUPPORTING INFORMATION 3

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

Increasing food supply resilience against climate and economic events

Reducing food miles and food waste

Paid employment and training opportunities

Reducing poverty

Improving community cohesion

SUPPORTING INFORMATION 4

National Planning Policy Framework (2021)

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;" (Paragraph 174)

SUPPORTING INFORMATION 5

National Planning Policy Framework (2021)

"Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:

c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;" (Paragraph 86)

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:

Respondent details

Comment ID number: PDSP.121.004

What is your Name: Fran H

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

Regather

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

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

Which section of the document is your representation on:

Chapter 2: Vision, Aims, and Objectives

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

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

Whilst the draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

SUGGESTED ADDITION

To position equitable access to healthy food at the heart of every community, by ensuring that land capable of producing food is identified and made available to the community, and that the development of related food infrastructure, e.g, local independent retail, is sufficiently supported.

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft)

"Future access: safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment: Improving human health through physical exercise and a more nutritious diet Mental health benefits of being outside and engaging in community

Increasing food supply resilience against climate and economic events

Reducing food miles and food waste

Reducing urban heat island effects

Community empowerment

Paid employment and training opportunities

Reducing poverty

Improving community cohesion

Feeding urban communities sustainably

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

- "Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:
- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling." (Paragraph 92).

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:

Respondent details

Comment ID number: PDSP.121.005

What is your Name: Fran H

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

Regather

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

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

Which section of the document is your representation on:

Chapter 2: Vision, Aims, and Objectives

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

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

Whilst the draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

SUGGESTED ADDITION

To prioritise land capable of producing food for agroecological food production, to not only ensure the resilience and sustainability of Sheffield's food supply but also mitigate against climate change; manage flood water; realise Biodiversity Net Gain; achieve net zero carbon by 2030, and reduce soil erosion and water contamination.

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft)

"Future access: safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

Protecting soil, improving soil quality, and maintaining carbon storage in soil Improving and enhancing biodiversity

Increasing food supply resilience against climate and economic events

Reducing food miles and food waste

Supporting plant genetic diversity

Reducing urban heat island effects

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions." (Paragraph 119) SUPPORTING INFORMATION 4

National Planning Policy Framework (2021)

"Planning policies and decisions should:

- a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains such as developments that would enable new habitat creation or improve public access to the countryside;
- b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production; (Paragraph 120).

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:

Respondent details

Comment ID number: PDSP.121.006

What is your Name: Fran H

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

Regather

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

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

Which section of the document is your representation on:

Chapter 2: Vision, Aims, and Objectives

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

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

Whilst the draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

SUGGESTED ADDITIONS

provide access to land for multipurpose use i.e. agroecological food production linked with habitat improvements to increase biodiversity

link agroecological food production with a culture and economy of outdoors-based learning around land based skills

work with local partners to create diverse land-based businesses that promote health and wellbeing, and build nature-focused leisure opportunities

Without these suggested modifications the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft)

"Future access: safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment: Improving human health through physical exercise and a more nutritious diet Mental health benefits of being outside and engaging in community

Protecting soil, improving soil quality, and maintaining carbon storage in soil Improving and enhancing biodiversity

Supporting plant genetic diversity

Reducing urban heat island effects

Paid employment and training opportunities

Improving community cohesion

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

"Planning policies and decisions should:

- a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains such as developments that would enable new habitat creation or improve public access to the countryside;
- b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;" (Paragraph 120)

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:

Respondent details

Comment ID number: PDSP.121.007

What is your Name: Fran H

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

Regather

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

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

Which section of the document is your representation on:

Chapter 2: Vision, Aims, and Objectives

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

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

Whilst the draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

SUGGESTED ADDITION

to protect and create community gardens, allotments, urban and periurban farms, and edible landscaping within open spaces, all of which contribute to the livablity of neighbourhoods and support residents' physical health and mental wellbeing. Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment: Improving human health through physical exercise and a more nutritious diet Mental health benefits of being outside and engaging in community Increasing food supply resilience against climate and economic events

Reducing food miles and food waste

Reducing urban heat island effects

Community empowerment

Paid employment and training opportunities

Reducing poverty

Improving community cohesion

Feeding urban communities sustainably

SUPPORTING INFORMATION 2

National Planning Policy Framework (2021)

"Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling." (Paragraph 92)

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions." (Paragraph 119)

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:

Respondent details

Comment ID number: PDSP.121.014

What is your Name: Fran H

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

Regather

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 draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

SUGGESTED AMENDMENTS

All blue and green infrastructure in the city will be protected, managed and enhanced, wherever possible, to help increase biodiversity, provide wider environmental benefits to combat climate change, ***increase the amount of agroecological food production***, deliver opportunities for outdoor recreation and strengthen the city's landscape character.

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:

major parks and green spaces of citywide importance for recreation, *** community food growing***, and/or biodiversity (Concord Park, Parson Cross Park, Norfolk Heritage Park, Graves Park, Ecclesall Woods, Endcliffe Park/Bingham Park/ Whiteley Woods, Greno Woods, Millhouses Park, Meersbrook Park, Shirebrook Valley, Parkwood Springs)

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft)

"Future access: safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment: Protecting soil, improving soil quality, and maintaining carbon storage in soil Improving and enhancing biodiversity

Increasing food supply resilience against climate and economic events

Reducing food miles and food waste

Supporting plant genetic diversity

Reducing urban heat island effects

Feeding urban communities sustainably

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

"Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate." (Paragraph 98).

SUPPORTING INFORMATION 4

National Planning Policy Framework (2021)

"Planning policies and decisions should:

b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;" (Paragraph 120).

SUPPORTING INFORMATION 5

Guidance to the English National Planning Policy Framework "Local planning Authorities can have a role by supporting opportunities for communities to access a wide range of healthy food production and consumption choices". (Paragraph: 004 Reference ID 53-004-20190722, Revision date: 22 07 2019)

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:

Respondent details

Comment ID number: PDSP.121.016

What is your Name: Fran H

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

Regather

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 D1: Design Principles and Priorities

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 draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

SUGGESTED ADDITION

Development should also:

Ensure that land capable of producing food is protected for the purpose of agroecological food production, where land is managed for multiple beneficial outcomes including: environmental services, meeting Net Zero by 2030 and Biodiversity Net Gain.

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft)

"Future access: safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

Protecting soil, improving soil quality, and maintaining carbon storage in soil Improving and enhancing biodiversity

Increasing food supply resilience against climate and economic events

Reducing food miles and food waste

Supporting plant genetic diversity

Reducing urban heat island effects

Feeding urban communities sustainably

SUPPORTING INFORMATION 3

Guidance to the English National Planning Policy Framework

"The design and use of the built in natural environments, including green infrastructure are major determinants of health and well-being. Planning and health need to be considered together in two ways: in terms of creating environments that support and encourage healthy lifestyles, And in terms of identifying and securing the facilities needed..." (Paragraph: 001 Reference ID 53-001-20190722, Revision date: 22 07 2019)

SUPPORTING INFORMATION 4

National Planning Policy Framework (2021)

"Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling." (Paragraph 92).

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:

Respondent details

Comment ID number: PDSP.121.018

What is your Name: Fran H

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

Regather

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 IN1: Infrastructure Provision

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 draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

SUGGESTED ADDITION

Infrastructure priorities will include:

Agroecological food production - future access to a localised and resilient food system will be secured by working with community partners to identify and develop sites capable of food production and create the services and facilities that enable equitable food provision

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft)

"Future access: safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment: Improving human health through physical exercise and a more nutritious diet Mental health benefits of being outside and engaging in community

Protecting soil, improving soil quality, and maintaining carbon storage in soil Improving and enhancing biodiversity

Increasing food supply resilience against climate and economic events

Reducing food miles and food waste

Supporting plant genetic diversity

Reducing urban heat island effects

Paid employment and training opportunities

Community empowerment

Reducing poverty

Improving community cohesion

Feeding urban communities sustainably

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

- "Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling." (Paragraph 92).

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:

Respondent details

Comment ID number: PDSP.121.021

What is your Name: Fran H

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

Regather

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 4: Thriving Neighbourhoods and Communities

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 draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

SUGGESTED AMENDMENT

4.2 Open space will be created within larger housing developments, reflecting the health benefits of being able to access outdoor spaces, ***especially where these spaces facilitate shared activities such as community gardening***

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft)

"Future access: safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment: Improving human health through physical exercise and a more nutritious diet Mental health benefits of being outside and engaging in community Increasing food supply resilience against climate and economic events Community empowerment

Reducing poverty

Improving community cohesion

Feeding urban communities sustainably

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

"Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling." (Paragraph 92).

SUPPORTING INFORMATION 4

National Planning Policy Framework (2021)

"Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport

and recreational provision is needed, which plans should then seek to accommodate." (Paragraph 98).

SUPPORTING INFORMATION 5

National Model Design Code: part 2 - guidance notes

"9) Allotments and community growing: need to consider community growing projects for food production, learning and community engagement on large developments." (p21)

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:

Respondent details

Comment ID number: PDSP.121.022

What is your Name: Fran H

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

Regather

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 4: Thriving Neighbourhoods and Communities

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 draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

SUGGESTED AMENDMENT

4.37. The catchment areas of District Centres, and particularly Local Centres, are important in developing a network of '20-minute neighbourhoods' across the city. The idea is that most of peoples' daily needs can be met within a 10-minute walk or cycle ride (so 10 minutes to travel there and 10 minutes to return); the objective is for residents to have easy, convenient access to many of the places and services they use daily including shops, health and community facilities, open spaces, ***including allotments, community gardens and urban farms***, pubs, restaurants without relying on a car. It is therefore important to have a sufficient number of centres and they must be evenly distributed around the whole of the city, reflecting population distribution and densities. The 20-minute neighbourhood has multiple benefits including boosting local economies, improving people's health and wellbeing, increasing social connections in communities, and tackling climate change. Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft)

"Future access: safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment: Improving human health through physical exercise and a more nutritious diet Mental health benefits of being outside and engaging in community Increasing food supply resilience against climate and economic events Reducing food miles and food waste

Paid employment and training opportunities

Community empowerment

Reducing poverty

Improving community cohesion

Feeding urban communities sustainably

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

"Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth,

management and adaptation. Planning policies should:

c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;" (Paragraph 86)

SUPPORTING INFORMATION 4

National Planning Policy Framework (2021)

"Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;

- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling." (Paragraph 92).

SUPPORTING INFORMATION 5

National Planning Policy Framework (2021)

"Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate." (Paragraph 98).

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:

Respondent details

Comment ID number: PDSP.121.024

What is your Name: Fran H

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

Regather

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:

Whilst the draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

SUGGESTED ADDITIONS

Any new open space that is provided should be:

assessed for community food growing opportunities, in recognition of the mental wellbeing benefits that come from working together in an outdoor environment and the positive health outcomes afforded by easier access to fruit and vegetables.
Missing from Table 2 'Open Space' definitions

***Community garden**

Urban Farm

Without these suggested modifications the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft)

"Future access: safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment: Improving human health through physical exercise and a more nutritious diet Mental health benefits of being outside and engaging in community Increasing food supply resilience against climate and economic events Community empowerment

Reducing poverty

Improving community cohesion

Feeding urban communities sustainably

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

- "Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:
- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling. (Paragraph 92).

SUPPORTING INFORMATION 4

National Planning Policy Framework (2021)

Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.

Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate. (Paragraph 98).

SUPPORTING INFORMATION 5

National Planning Policy Framework (2021)

"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions." (Paragraph 119) SUPPORTING INFORMATION 6

National Model Design Code: part 2 - guidance notes

"9) Allotments and community growing: need to consider community growing projects for food production, learning and community engagement on large developments." (p21)

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:

Respondent details

Comment ID number: PDSP.121.027

What is your Name: Fran H

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

Regather

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:

Whilst the draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

SUGGESTED AMENDMENT

8.2. The creation and enhancement of habitats, together with the implementation of nature-based solutions to issues such as land drainage, will deliver wider environmental, social and economic gains for the city. It helps reduce carbon emissions, flooding, pollution and the urban heat island effect, making the city more resilient to the increasing pressures of climate change. It also benefits our own health and well-being by creating opportunities for recreation, ***agroecological food production*** and equal access to nature and the outdoor environment for all, while ensuring any negative impacts on biodiversity are avoided.

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft)

"Future access: safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment: Improving human health through physical exercise and a more nutritious diet Mental health benefits of being outside and engaging in community

Protecting soil, improving soil quality, and maintaining carbon storage in soil Improving and enhancing biodiversity

Supporting plant genetic diversity

Feeding urban communities sustainably

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

"Planning policies and decisions should:

b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;" (Paragraph 120)

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:

Respondent details

Comment ID number: PDSP.121.028

What is your Name: Fran H

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

Regather

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:

Whilst the draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

SUGGESTED AMENDMENT

The Urban Greenspace Zones shown on the Policies Map cover a range of private and public land which is valuable for recreation or ecology, landscape, heritage, visual amenity, functional floodplain or local food production (allotments,***community gardens & predominantly green in character or are in use for outdoor recreation. They include areas of 'open space' (as defined in the National Planning Policy Framework 20). Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft)

"Future access: safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment: Improving human health through physical exercise and a more nutritious diet Mental health benefits of being outside and engaging in community Protecting soil, improving soil quality, and maintaining carbon storage in soil Improving and enhancing biodiversity

Increasing food supply resilience against climate and economic events

Reducing food miles and food waste

Supporting plant genetic diversity

Reducing urban heat island effects

Paid employment and training opportunities

Community empowerment

Reducing poverty

Improving community cohesion

Feeding urban communities sustainably

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:

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

Respondent details

Comment ID number: PDSP.121.029

What is your Name: Fran H

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

Regather

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:

Whilst the draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

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 AMENDMENT

c) safeguard, or not otherwise adversely affect, a greenspace of high amenity ***or of food growing*** value; or

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft)

"Future access: safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment: Improving human health through physical exercise and a more nutritious diet Mental health benefits of being outside and engaging in community

Protecting soil, improving soil quality, and maintaining carbon storage in soil Improving and enhancing biodiversity

Increasing food supply resilience against climate and economic events

Reducing food miles and food waste

Supporting plant genetic diversity

Reducing urban heat island effects

Paid employment and training opportunities

Community empowerment

Reducing poverty

Improving community cohesion

Feeding urban communities sustainably

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:

The absence of clear policy measures to plan for local food infrastructure within the draft Local Plan shows that the Sheffield City Council Planning Service has failed to access the expertise of the Sheffield citizens and institutions working towards a b

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

Respondent details

Comment ID number: PDSP.121.032

What is your Name: Fran H

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

Regather

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 GS4: Safeguarding the Best and Most Versatile Agricultural Land

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 draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

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 AMENDMENT

Where development is permitted on the best and most versatile agricultural land, it should be directed towards the lowest grade of land wherever possible. ***Due to local scarcity, land of Grade 3a and above should be protected for agroecological horticultural production.***

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft)

"Future access: safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

Protecting soil, improving soil quality, and maintaining carbon storage in soil Improving and enhancing biodiversity

Increasing food supply resilience against climate and economic events

Reducing food miles and food waste

Supporting plant genetic diversity

Paid employment and training opportunities

Feeding urban communities sustainably

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

"Planning policies and decisions should enable:

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;
- b) the development and diversification of agricultural and other land-based rural businesses;" (Paragraph 84)

SUPPORTING INFORMATION 4

National Planning Policy Framework (2021)

- "Planning policies and decisions should contribute to and enhance the natural and local environment by:
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; (Paragraph 174)

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:

The absence of clear policy measures to plan for local food infrastructure within the draft Local Plan shows that the Sheffield City Council Planning Service has failed to access the expertise of the Sheffield citizens and institutions working towards a b

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

Respondent details

Comment ID number: PDSP.121.034

What is your Name: Fran H

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

Regather

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 DE3: Public Realm and Landscape Design

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 draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

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 AMENDMENT

Landscape proposals should be informed by detailed appraisals of the site, context and local character to help create multifunctional, attractive, legible, well-defined spaces around and between buildings. These should be designed in a manner that is inclusive, dementia friendly, improves vitality and safety, encourages active and healthy lifestyles, ***promotes good mental health through nature access** and enhances biodiversity. Development should therefore ensure that:

SUGGESTED ADDITION

the design for the public realm includes site appropriate edible planting, such as fruit trees, fruiting shrubs and culinary herbs, helping to connect people with nature through edible landscaping

Without these suggested modifications the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment: Improving human health through physical exercise and a more nutritious diet Improving and enhancing biodiversity

Increasing food supply resilience against climate and economic events Improving community cohesion

Feeding urban communities sustainably

SUPPORTING INFORMATION 2

National Planning Policy Framework (2021)

- "Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:
- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling." (Paragraph 92).

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:

The absence of clear policy measures to plan for local food infrastructure within the draft Local Plan shows that the Sheffield City Council Planning Service has failed to access the expertise of the Sheffield citizens and institutions working towards a b

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

Respondent details

Comment ID number: PDSP.121.036

What is your Name: Fran H

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

Regather

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 DC1: The Community Infrastructure Levy (CIL) and other Developer Contributions

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 draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

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 AMENDMENT

Other Developer Contributions Developers of housing schemes comprising 10 or more new homes will be required to contribute towards education facilities, health facilities, open space ***and provision for community food growing***, where needs are not being met through the CIL or other funded capital programmes and where further mitigation is necessary to make the development acceptable in planning terms.

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft)

"Future access: safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment: Improving human health through physical exercise and a more nutritious diet Mental health benefits of being outside and engaging in community

Protecting soil, improving soil quality, and maintaining carbon storage in soil Improving and enhancing biodiversity

Increasing food supply resilience against climate and economic events

Reducing food miles and food waste

Supporting plant genetic diversity

Reducing urban heat island effects

Paid employment and training opportunities

Community empowerment

Reducing poverty

Improving community cohesion

Feeding urban communities sustainably

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

- "Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:
- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to

healthier food, allotments and layouts that encourage walking and cycling." (Paragraph 92).

SUPPORTING INFORMATION 4

National Model Design Code: part 2 - guidance notes

"9) Allotments and community growing: need to consider community growing projects for food production, learning and community engagement on large developments." (p21)

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:

The absence of clear policy measures to plan for local food infrastructure within the draft Local Plan shows that the Sheffield City Council Planning Service has failed to access the expertise of the Sheffield citizens and institutions working towards a b

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

Respondent details

Comment ID number: PDSP.121.037

What is your Name: Fran H

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

Regather

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:

NWS04

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 draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

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:

OBJECTION

Rezoning this land from an allotment to industrial use represents a net loss of local food production capacity and no alternative allotment provision is being proposed within the draft Local Plan. Yet there are still people on the waiting list to access allotments. This is therefore in opposition to Council policy:
SUPPORTING INFORMATION 1

Sheffield Local Plan (draft)

POLICY GS1: DEVELOPMENT IN URBAN GREEN SPACE ZONES

"In Urban Greenspace Zones, development should: a) not result in the loss of open space unless: (i) an assessment has been undertaken which clearly shows the open space and any associated recreational buildings are surplus to requirements; or (ii) the open space that is lost would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location;"

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:

The absence of clear policy measures to plan for local food infrastructure within the draft Local Plan shows that the Sheffield City Council Planning Service has failed to access the expertise of the Sheffield citizens and institutions working towards a b

From:
To: SheffieldPlan

Subject: Regather"s response to the draft Local Plan

Date: 19 February 2023 18:42:43

Attachments: 92e1bfc6b2d562235a5957a7ddcedf6e Reg 19 Consultation Form - Part A.pdf

92e1bfc6b2d562235a5957a7ddcedf6e Reg 19 Consultation Form - Part B Appendix 1 - List of Site

Allocations.odt

92e1bfc6b2d562235a5957a7ddcedf6e Reg 19 Consultation Form - Part B Chapter 2 Vision, Aims, and

Objectives.odt

92e1bfc6b2d562235a5957a7ddcedf6e Reg 19 Consultation Form - Part B Chapter 2- Vision, Aims, and

Objectives - Objectives for a strong economy.odt

92e1bfc6b2d562235a5957a7ddcedf6e Reg 19 Consultation Form - Part B Chapter 2- Vision, Aims, and

Objectives - Objectives for a green city.odt

92e1bfc6b2d562235a5957a7ddcedf6e Reg 19 Consultation Form - Part B Chapter 2- Vision, Aims, and

Objectives - Objectives for a well-designed city.odt

92e1bfc6b2d562235a5957a7ddcedf6e Reg 19 Consultation Form - Part B Chapter 2- Vision, Aims, and

Objectives - Objectives for thriving neighbourhoods and communities.odt

92e1bfc6b2d562235a5957a7ddcedf6e Reg 19 Consultation Form - Part B Chapter 4- Thriving

Neighbourhoods and Communities - Creating Sustainable Communities Development in District and Local

Centres.odt

92e1bfc6b2d562235a5957a7ddcedf6e Reg 19 Consultation Form - Part B Chapter 2- Vision, Aims, and

Objectives - Objectives for an environmentally sustainable city.odt

92e1bfc6b2d562235a5957a7ddcedf6e Reg 19 Consultation Form - Part B Chapter 8- A Green City -

responding to the Biodiversity Emergency-Development in Urban Greenspace Zones.odt

92e1bfc6b2d562235a5957a7ddcedf6e Reg 19 Consultation Form - Part B Chapter 4- Thriving

Neighbourhoods and Communities.odt

92e1bfc6b2d562235a5957a7ddcedf6e Reg 19 Consultation Form - Part B Chapter 8- A Green City -

responding to the Biodiversity Emergency.odt

92e1bfc6b2d562235a5957a7ddcedf6e Reg 19 Consultation Form - Part B POLICY BG1 - BLUE AND

GREEN INFRASTRUCTURE.odt

92e1bfc6b2d562235a5957a7ddcedf6e Reg 19 Consultation Form - Part B Policy D1 - DESIGN

PRINCIPLES AND PRIORITIES.odt

92e1bfc6b2d562235a5957a7ddcedf6e Reg 19 Consultation Form - Part B POLICY DC1- THE

COMMUNITY INFRASTRUCTURE LEVY (CIL) AND OTHER DEVELOPER CONTRIBUTIONS.odt

92e1bfc6b2d562235a5957a7ddcedf6e Reg 19 Consultation Form - Part B POLICY DE3- PUBLIC REALM

AND LANDSCAPE DESIGN.odt

92e1bfc6b2d562235a5957a7ddcedf6e Reg 19 Consultation Form - Part B POLICY GS4- SAFEGUARDING

THE BEST AND MOST VERSATILE AGRICULTURAL LAND.odt
92e1bfc6b2d562235a5957a7ddcedf6e Reg 19 Consultation Form - Part B POLICY GS1- DEVELOPMENT

IN URBAN GREEN SPACE ZONES.odt

92e1bfc6b2d562235a5957a7ddcedf6e Reg 19 Consultation Form - Part B POLICY IN1 -

INFRASTRUCTURE PROVISION.odt
92e1bfc6b2d562235a5957a7ddcedf6e Reg 19 Consultation Form - Part B POLICY NC15- CREATING

OPEN SPACE IN RESIDENTIAL DEVELOPMENTS.odt

Regather Letter.pdf

Hello,

please find attached below completed consultation forms with Regather's response to the draft Local Plan.

Also attached is a covering letter plus the various research publications and reports that we contend should have been consulted for the development of the draft Local Plan.

ShefFood Bronze Award SUBMISSION

https://drive.google.com/file/d/1RkluOClPvmxOmCMEXTikn4RzdWDVtRk0/view?usp=share_link

Low carbon food infrastructure in Sheffield A4

https://drive.google.com/file/d/1FeEg34F71SinNF03m79NeUhIuRFyBAJ0/view?usp=share link

Farming Sheffields Fringe (2021)

https://drive.google.com/file/d/1YgCIftlIusI9-0wzl3iNg_tkSJy86Wg/view?usp=share_link

Fringe Farming report (2022)

https://drive.google.com/file/d/1PoSpjLDfVbTN-qwROye3DUdxmHiw-uKM/view?

usp=share_link

Please use this form to provide representations on the Sheffield Local Plan. Sheffield City Council must receive representations by **5pm on 20th February 2023**. Only those representations received by that time have the statutory right to be considered by the inspector at the subsequent examination.

Responses can be	oe su	bmitted	via
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- ? the electronic version of the comment form which can be found on the Council's web site at: https://haveyoursaysheffield.uk.engagementhg.com/draft-local-plan
- ? an e-mail attachment: sheffieldplan@sheffield.gov.uk
- Post to: Strategic Planning Team, Planning Service, 4th Floor, Howden House, Sheffield S1 2SH

Please note:

Representations must only be made on the basis of the legal compliance, compliance with the Duty to Co-operate and/or soundness of the Plan.

Please read the guidance note, attached or available on the Council's webpage##, before you make your representations. The Local Plan and the proposed submission documents, and the evidence base are also available to view and download from the Council's Local Plan webpage:

Data Protection Notice:

Under the General Data Protection Regulation 2016 (GDPR) and Data Protection Act 2018 (DPA) Sheffield City Council is a Data Controller for the information it holds about you. The lawful basis under which the Council uses personal data for this purpose is consent.

All representations are required to be made public and will be published on the Council's website following this consultation. Your representations and name/name of your organisation will be published, but other personal information will remain confidential. Your data and comments will be shared with other relevant agencies involved in the preparation of the local plan, including the Planning Inspectorate. Anonymous responses will not be considered. Your personal data will be held and processed in accordance with the Council's Privacy Notice which can be viewed at: https://www.sheffield.gov.uk/utilities/footer-links/privacy-notice

Due to the Data Protection Act 2018, Sheffield City Council now needs your consent to hold your personal data for use as part of the Sheffield Plan process. If you would like the Council to keep you informed about the Sheffield Plan, we need to hold your data on file. Please tick the box below to confirm if you would like to 'opt in' to receive information about the Sheffield Plan. Note that choosing to 'opt in' will mean that the Council will hold your information for 2 years from the 'opt in' date. At this time we will contact you to review if you wish to 'opt in' again. You can opt-out at any time by emailing sheffield.gov.uk or by calling 0114 2735897.

Please tick/ delete as appropriate:

Please confirm you have read and understood the terms and conditions relating to GDPR.

Yes	√		
No			

Please tick as appropriate to confirm your consent for Sheffield City Council to publish and share your name/ organisation and comments regarding the Sheffield Plan.

I confirm my consent for Sheffield City Council to share my name/ organisation and comments regarding the Sheffield Plan including with the Planning Inspectorate.

Yes 🗵

No \square

Please tick as appropriate below if you wish to 'opt in' and receive updates and information about the Sheffield Plan.

I would like to opt in to receive information about the Sheffield Plan.

Yes

1

No 🗆

Printed Name: Fran Halsall

Signature:



Date: 19^h February 2023

This form has two parts:

Part A - Personal details - need only to complete once.

Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part A- Personal Details

1. Personal Details

Name: Fran Halsall

Organisation (if applicable): Regather

Address: 57-59 Club Garden Road, Sheffield

Postcode:

Tel:

Fax:

Email:

2. Agent Details (if applicable)

Agent:

Organisation (if applicable):

Address:

Postcode:

Tel:

Fax:

Email:

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Regather

1. To which part of the Sheffield Plan does your representation relate?

Appendix 1 - List of Site Allocations

NWS04: Allotments to the south of Wardsend Road North, S6 1LX

2. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1)	Legally Compliant	Yes	√
4.(2)	Sound	No Yes	
		No	√
4.(3)	Complies with the Duty to Cooperate	Yes No	V

3. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Whilst the draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

Continue on a separate sheet if necessary

4. Please set out the modification(s) you consider necessary to make the Sheffield Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Sheffield Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

OBJECTION

Rezoning this land from an allotment to industrial use represents a net loss of local food production capacity and no alternative allotment provision is being proposed within the draft Local Plan. Yet there are still people on the waiting list to access allotments. This is therefore in opposition to Council policy:

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Sheffield Local Plan (draft)

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Continue on a separate sheet if necessary

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After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

5. 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)

Yes ✓

No, I do not wish to participate in hearing session(s)

No

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The absence of clear policy measures to plan for local food infrastructure within the draft Local Plan shows that the Sheffield City Council Planning Service has failed to access the expertise of the Sheffield citizens and institutions working towards a better food future. As a leading organisation in the development of a healthier, fairer and more sustainable food system for Sheffield, Regather is well placed to participate in the hearing session(s) to advise on these missed opportunities and provide amendments that will help to ensure that Sheffield is best situated to meet the challenges and opportunities of the future.

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Regather

1. To which part of the Sheffield Plan does your representation relate?

Chapter 2: Vision, Aims, and Objectives

2. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

No
4.(2) Sound

Yes

No

✓

4.(3) Complies with the Duty to Cooperate

Yes

No

3. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Whilst the draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

Continue on a separate sheet if necessary

4. Please set out the modification(s) you consider necessary to make the Sheffield Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at

SUGGESTED ADDITION

The city's resilience to the effects of climate change, biodiversity loss and geopolitical instability negatively impacting the food system will be achieved by protecting land capable of producing food.

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener - A Food Strategy for Sheffield (draft)

<u>"Future access:</u> safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

• The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

- Protecting soil, improving soil quality, and maintaining carbon storage in soil
- Improving and enhancing biodiversity
- Increasing food supply resilience against climate and economic events
- · Reducing food miles and food waste
- Supporting plant genetic diversity
- · Reducing urban heat island effect

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

"Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate." (Paragraph 98).

examination). You will need to say why each modification will make the Sheffield Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Continue on a separate sheet if necessary

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5. 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)

Yes ✓

No. I do not wish to participate in hearing session(s)

No

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The absence of clear policy measures to plan for local food infrastructure within the draft Local Plan shows that the Sheffield City Council Planning Service has failed to access the expertise of the Sheffield citizens and institutions working towards a better food future. As a leading organisation in the development of a healthier, fairer and more sustainable food system for Sheffield, Regather is well placed to participate in the hearing session(s) to advise on these missed opportunities and provide amendments that will help to ensure that Sheffield is best situated to meet the challenges and opportunities of the future.

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Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Regather

1. To which part of the Sheffield Plan does your representation relate?

Chapter 2: Vision, Aims, and Objectives - Objectives for a strong economy

2. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

Legally Compliant	Yes	V
Sound	No Yes	
	No	√
Complies with the Duty to Cooperate	Yes No	V
	Sound	Sound No Yes No Complies with the Duty to Cooperate Yes

3. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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Continue on a separate sheet if necessary

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(Please note that non-compliance with the duty to co-operate is incapable of modification at

SUGGESTED ADDITION

*** to safeguard land capable of producing food, in recognition of the local food system's fundamental role in both providing nutrition for a healthy population and as a cornerstone of a resilient economy - one that is less vulnerable to geopolitical and climatic instability - and where public procurement purchasing power is used to reward the most sustainable farming practices.***

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener - A Food Strategy for Sheffield (draft)

<u>"Future access:</u> safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

• Consider whether the council should adopt a range of sustainable standards for our internal catering including, for example, meat and dairy reduction, locally grown, reduction in single use plastic, reduction in food waste"

SUPPORTING INFORMATION 2

National Food Strategy - The Plan: Recommendation 13 -

"Strengthen Government procurement rules to ensure that taxpayer money is spent on healthy and sustainable food."

SUPPORTING INFORMATION 3

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

- · Increasing food supply resilience against climate and economic events
- · Reducing food miles and food waste
- Paid employment and training opportunities
- Reducing poverty
- Improving community cohesion

SUPPORTING INFORMATION 4

National Planning Policy Framework (2021)

"Planning policies and decisions should contribute to and enhance the natural and local environment by:
b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital
and ecosystem services – including the economic and other benefits of the best and most versatile agricultural
land, and of trees and woodland;" (Paragraph 174)

SUPPORTING INFORMATION 5

National Planning Policy Framework (2021)

"Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:

c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;" (Paragraph 86)

examination). You will need to say why each modification will make the Sheffield Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Continue on a separate sheet if necessary

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5. 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)

Yes ✓

No, I do not wish to participate in hearing session(s)

No

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The absence of clear policy measures to plan for local food infrastructure within the draft Local Plan shows that the Sheffield City Council Planning Service has failed to access the expertise of the Sheffield citizens and institutions working towards a better food future. As a leading organisation in the development of a healthier, fairer and more sustainable food system for Sheffield, Regather is well placed to participate in the hearing session(s) to advise on these missed opportunities and provide amendments that will help to ensure that Sheffield is best situated to meet the challenges and opportunities of the future.

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Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Regather

1. To which part of the Sheffield Plan does your representation relate?

Chapter 2: Vision, Aims, and Objectives - Objectives for a green city

2. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

No
4.(2) Sound

Yes

No

✓

4.(3) Complies with the Duty to Cooperate

Yes

No

3. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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SUGGESTED ADDITIONS

- ***provide access to land for multipurpose use i.e. agroecological food production linked with habitat improvements to increase biodiversity***
- ***link agroecological food production with a culture and economy of outdoors-based learning around land based skills***
- ***work with local partners to create diverse land-based businesses that promote health and wellbeing, and build nature-focused leisure opportunities***

Without these suggested modifications the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener - A Food Strategy for Sheffield (draft)

<u>"Future access:</u> safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

• The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

- Improving human health through physical exercise and a more nutritious diet
- · Mental health benefits of being outside and engaging in community
- · Protecting soil, improving soil quality, and maintaining carbon storage in soil
- Improving and enhancing biodiversity
- · Supporting plant genetic diversity
- · Reducing urban heat island effects
- · Paid employment and training opportunities
- · Improving community cohesion

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

"Planning policies and decisions should:

- a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains such as developments that would enable new habitat creation or improve public access to the countryside;
- b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;" (Paragraph 120)

Continue on a separate sheet if necessary

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Yes, I wish to participate in hearing session(s)

Yes ✓

No, I do not wish to participate in hearing session(s)

No

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Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Regather

1. To which part of the Sheffield Plan does your representation relate?

Chapter 2: Vision, Aims, and Objectives - Objectives for a well-designed city

2. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes

No

4.(2) Sound

Yes

No

✓

4.(3) Complies with the Duty to Cooperate

Yes

No

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SUGGESTED ADDITION

to protect and create community gardens, allotments, urban and periurban farms, and edible landscaping within open spaces, all of which contribute to the livablity of neighbourhoods and support residents' physical health and mental wellbeing.

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

- · Improving human health through physical exercise and a more nutritious diet
- · Mental health benefits of being outside and engaging in community
- · Increasing food supply resilience against climate and economic events
- · Reducing food miles and food waste
- · Reducing urban heat island effects
- · Community empowerment
- · Paid employment and training opportunities
- · Reducing poverty
- · Improving community cohesion
- · Feeding urban communities sustainably

SUPPORTING INFORMATION 2

National Planning Policy Framework (2021)

"Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling." (Paragraph 92)

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions." (Paragraph 119)

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

5. 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)

Yes ✓

No, I do not wish to participate in hearing session(s)

No

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The absence of clear policy measures to plan for local food infrastructure within the draft Local Plan shows that the Sheffield City Council Planning Service has failed to access the expertise of the Sheffield citizens and institutions working towards a better food future. As a leading organisation in the development of a healthier, fairer and more sustainable food system for Sheffield, Regather is well placed to participate in the hearing session(s) to advise on these missed opportunities and provide amendments that will help to ensure that Sheffield is best situated to meet the challenges and opportunities of the future.

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Regather

1. To which part of the Sheffield Plan does your representation relate?

Chapter 2: Vision, Aims, and Objectives - Objectives for thriving neighbourhoods and communities

2. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes

No

4.(2) Sound

Yes

No

✓

4.(3) Complies with the Duty to Cooperate

Yes

No

3. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Whilst the draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

Continue on a separate sheet if necessary

4. Please set out the modification(s) you consider necessary to make the Sheffield Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Sheffield Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

SUGGESTED ADDITION

To position equitable access to healthy food at the heart of every community, by ensuring that land capable of producing food is identified and made available to the community, and that the development of related food infrastructure, e.g, local independent retail, is sufficiently supported.

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener - A Food Strategy for Sheffield (draft)

<u>"Future access:</u> safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

• The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

- · Improving human health through physical exercise and a more nutritious diet
- · Mental health benefits of being outside and engaging in community
- · Increasing food supply resilience against climate and economic events
- · Reducing food miles and food waste
- · Reducing urban heat island effects
- Community empowerment
- Paid employment and training opportunities
- · Reducing poverty
- · Improving community cohesion
- · Feeding urban communities sustainably

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

"Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling." (Paragraph 92).

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

5. 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)

Yes ✓

No, I do not wish to participate in hearing session(s)

No

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The absence of clear policy measures to plan for local food infrastructure within the draft Local Plan shows that the Sheffield City Council Planning Service has failed to access the expertise of the Sheffield citizens and institutions working towards a better food future. As a leading organisation in the development of a healthier, fairer and more sustainable food system for Sheffield, Regather is well placed to participate in the hearing session(s) to advise on these missed opportunities and provide amendments that will help to ensure that Sheffield is best situated to meet the challenges and opportunities of the future.

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Regather

1. To which part of the Sheffield Plan does your representation relate?

Chapter 4: Thriving Neighbourhoods and Communities - Creating Sustainable Communities **Development in District and Local Centres**

2. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant Yes $\overline{\mathsf{V}}$ No 4.(2) Sound Yes No \checkmark 4.(3) Complies with the Duty to Cooperate Yes \checkmark

3. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as

No

possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Whilst the draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

Continue on a separate sheet if necessary

4. Please set out the modification(s) you consider necessary to make the Sheffield Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at

SUGGESTED AMENDMENT

4.37. The catchment areas of District Centres, and particularly Local Centres, are important in developing a network of '20-minute neighbourhoods' across the city. The idea is that most of peoples' daily needs can be met within a 10-minute wak or cycle ride (so 10 minutes to travel there and 10 minutes to return); the objective is for residents to have easy, convenient access to many of the places and services they use daily including shops, health and community facilities, open spaces, ***including allotments, community gardens and urban farms***, pubs, restaurants without relying on a car. It is therefore important to have a sufficient number of centres and they must be evenly distributed around the whole of the city, reflecting population distribution and densities. The 20-minute neighbourhood has multiple benefits including boosting local economies, improving people's health and wellbeing, increasing social connections in communities, and tackling climate change.

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener - A Food Strategy for Sheffield (draft)

Future access: safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

• The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

- Improving human health through physical exercise and a more nutritious diet
- Mental health benefits of being outside and engaging in community
- Increasing food supply resilience against climate and economic events
- Reducing food miles and food waste
- · Paid employment and training opportunities
- Community empowerment
- · Reducing poverty
- · Improving community cohesion
- · Feeding urban communities sustainably

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

"Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:

c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;" (Paragraph 86)

SUPPORTING INFORMATION 4

National Planning Policy Framework (2021)

"Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
- b) are safe and access ble, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage wa king and cycling." (Paragraph 92).

SUPPORTING INFORMATION 5

National Planning Policy Framework (2021)

"Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate." (Paragraph 98).

examination). You will need to say why each modification will make the Sheffield Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. **After this stage, further submissions may only be made if invited by the Inspector, based**

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

5. 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)

Yes ✓

No, I do not wish to participate in hearing session(s)

No

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The absence of clear policy measures to plan for local food infrastructure within the draft Local Plan shows that the Sheffield City Council Planning Service has failed to access the expertise of the Sheffield citizens and institutions working towards a better food future. As a leading organisation in the development of a healthier, fairer and more sustainable food system for Sheffield, Regather is well placed to participate in the hearing session(s) to advise on these missed opportunities and provide amendments that will help to ensure that Sheffield is best situated to meet the challenges and opportunities of the future.

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Regather

1. To which part of the Sheffield Plan does your representation relate?

Chapter 2: Vision, Aims, and Objectives - Objectives for an environmentally sustainable city

2. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes

No

4.(2) Sound

Yes

No

✓

4.(3) Complies with the Duty to Cooperate

Yes

No

3. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Whilst the draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

Continue on a separate sheet if necessary

SUGGESTED ADDITION

To prioritise land capable of producing food for agroecological food production, to not only ensure the resilience and sustainability of Sheffield's food supply but also mitigate against climate change; manage flood water; realise Biodiversity Net Gain; achieve net zero carbon by 2030, and reduce soil erosion and water contamination.

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener - A Food Strategy for Sheffield (draft)

<u>"Future access:</u> safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

- · Protecting soil, improving soil quality, and maintaining carbon storage in soil
- · Improving and enhancing biodiversity
- · Increasing food supply resilience against climate and economic events
- · Reducing food miles and food waste
- · Supporting plant genetic diversity
- · Reducing urban heat island effects

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions." (Paragraph 119)

SUPPORTING INFORMATION 4

National Planning Policy Framework (2021)

"Planning policies and decisions should:

- a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains such as developments that would enable new habitat creation or improve public access to the countryside;
- b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production; (Paragraph 120).

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

5. 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)

Yes ✓

No, I do not wish to participate in hearing session(s)

No

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The absence of clear policy measures to plan for local food infrastructure within the draft Local Plan shows that the Sheffield City Council Planning Service has failed to access the expertise of the Sheffield citizens and institutions working towards a better food future. As a leading organisation in the development of a healthier, fairer and more sustainable food system for Sheffield, Regather is well placed to participate in the hearing session(s) to advise on these missed opportunities and provide amendments that will help to ensure that Sheffield is best situated to meet the challenges and opportunities of the future.

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Regather

1. To which part of the Sheffield Plan does your representation relate?

Chapter 8: A Green City – responding to the Biodiversity Emergency - Development in Urban Greenspace Zones

2. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes

No

4.(2) Sound

Yes

No

✓

4.(3) Complies with the Duty to Cooperate

Yes

No

3. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Whilst the draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

Continue on a separate sheet if necessary

SUGGESTED AMENDMENT

The Urban Greenspace Zones shown on the Policies Map cover a range of private and public land which is valuable for recreation or ecology, landscape, heritage, visual amenity, functional floodplain or local food production (allotments, ***community gardens & urban farms***). The areas are predominantly green in character or are in use for outdoor recreation. They include areas of 'open space' (as defined in the National Planning Policy Framework 20).

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft)

<u>"Future access:</u> safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

• The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

- Improving human health through physical exercise and a more nutritious diet
- · Mental health benefits of being outside and engaging in community
- · Protecting soil, improving soil quality, and maintaining carbon storage in soil
- · Improving and enhancing biodiversity
- · Increasing food supply resilience against climate and economic events
- · Reducing food miles and food waste
- · Supporting plant genetic diversity
- Reducing urban heat island effects
- · Paid employment and training opportunities
- · Community empowerment
- Reducing poverty
- · Improving community cohesion
- · Feeding urban communities sustainably

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

5. 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)

Yes ✓

No, I do not wish to participate in hearing session(s)

No

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The absence of clear policy measures to plan for local food infrastructure within the draft Local Plan shows that the Sheffield City Council Planning Service has failed to access the expertise of the Sheffield citizens and institutions working towards a better food future. As a leading organisation in the development of a healthier, fairer and more sustainable food system for Sheffield, Regather is well placed to participate in the hearing session(s) to advise on these missed opportunities and provide amendments that will help to ensure that Sheffield is best situated to meet the challenges and opportunities of the future.

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Regather

1. To which part of the Sheffield Plan does your representation relate?

Chapter 4: Thriving Neighbourhoods and Communities

2. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1)	Legally Compliant	Yes	√
4.(2)	Sound	No Yes	
		No	√
4.(3)	Complies with the Duty to Cooperate	Yes	V

3. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Whilst the draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

Continue on a separate sheet if necessary

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Sheffield Plan

SUGGESTED AMENDMENT

4.2 Open space will be created within larger housing developments, reflecting the health benefits of being able to access outdoor spaces, ***especially where these spaces facilitate shared activities such as community gardening***

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft)

<u>"Future access:</u> safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

 The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

- Improving human health through physical exercise and a more nutritious diet
- · Mental health benefits of being outside and engaging in community
- · Increasing food supply resilience against climate and economic events
- Community empowerment
- · Reducing poverty
- · Improving community cohesion
- · Feeding urban communities sustainably

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

"Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling." (Paragraph 92).

SUPPORTING INFORMATION 4

National Planning Policy Framework (2021)

"Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate." (Paragraph 98).

SUPPORTING INFORMATION 5

National Model Design Code: part 2 - guidance notes

"9) Allotments and community growing: need to consider community growing projects for food production, learning and community engagement on large developments." (p21)

legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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5. 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)

Yes ✓

No. I do not wish to participate in hearing session(s)

No

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The absence of clear policy measures to plan for local food infrastructure within the draft Local Plan shows that the Sheffield City Council Planning Service has failed to access the expertise of the Sheffield citizens and institutions working towards a better food future. As a leading organisation in the development of a healthier, fairer and more sustainable food system for Sheffield, Regather is well placed to participate in the hearing session(s) to advise on these missed opportunities and provide amendments that will help to ensure that Sheffield is best situated to meet the challenges and opportunities of the future.

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Regather

1. To which part of the Sheffield Plan does your representation relate?

Chapter 8: A Green City – responding to the Biodiversity Emergency

2. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1)	Legally Compliant	Yes	√
4.(2)	Sound	No Yes	
		No	✓
4.(3)	Complies with the Duty to Cooperate	Yes	✓
		NIO	

3. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Whilst the draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

Continue on a separate sheet if necessary

SUGGESTED AMENDMENT

8.2. The creation and enhancement of habitats, together with the implementation of nature-based solutions to issues such as land drainage, will deliver wider environmental, social and economic gains for the city. It helps reduce carbon emissions, flooding, pollution and the urban heat island effect, making the city more resilient to the increasing pressures of climate change. It also benefits our own health and well-being by creating opportunities for recreation, ***agroecological food production*** and equal access to nature and the outdoor environment for all, while ensuring any negative impacts on biodiversity are avoided.

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft)

"Future access: safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

• The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

- · Improving human health through physical exercise and a more nutritious diet
- Mental health benefits of being outside and engaging in community
- · Protecting soil, improving soil quality, and maintaining carbon storage in soil
- · Improving and enhancing biodiversity
- · Supporting plant genetic diversity
- · Feeding urban communities sustainably

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

"Planning policies and decisions should:

b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;" (Paragraph 120)

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

5. 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)

Yes ✓

No, I do not wish to participate in hearing session(s)

No

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The absence of clear policy measures to plan for local food infrastructure within the draft Local Plan shows that the Sheffield City Council Planning Service has failed to access the expertise of the Sheffield citizens and institutions working towards a better food future. As a leading organisation in the development of a healthier, fairer and more sustainable food system for Sheffield, Regather is well placed to participate in the hearing session(s) to advise on these missed opportunities and provide amendments that will help to ensure that Sheffield is best situated to meet the challenges and opportunities of the future.

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Regather

1. To which part of the Sheffield Plan does your representation relate?

Policy Number: POLICY BG1 - BLUE AND GREEN INFRASTRUCTURE

2. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant Yes

No Vos

4.(2) Sound Yes

No ✓

√

4.(3) Complies with the Duty to Cooperate Yes ✓

No

3. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Whilst the draft Local Plan could be considered consistent with national policy, we contend that the draft Local Plan does not contain adequate policies for the sustainable development of local food infrastructure, nor does it fully utilise the National Planning Policy Framework to achieve sustainable development of local food infrastructure. Therefore the draft Local Plan cannot be considered to be positively prepared and is therefore unsound.

Continue on a separate sheet if necessary

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Sheffield Plan

SUGGESTED AMENDMENTS

All blue and green infrastructure in the city will be protected, managed and enhanced, wherever possible, to help increase biodiversity, provide wider environmental benefits to combat climate change, ***increase the amount of agroecological food production ****, deliver opportunities for outdoor recreation and strengthen the city's landscape character.

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:

major parks and green spaces of citywide importance for recreation, *** community food growing***, and/or biodiversity (Concord Park, Parson Cross Park, Norfolk Heritage Park, Graves Park, Ecclesall Woods, Endcliffe Park/Bingham Park/ Whiteley Woods, Greno Woods, Millhouses Park, Meersbrook Park, Shirebrook Valley, Parkwood Springs)

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft)

"Future access: safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

• The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

- · Protecting soil, improving soil quality, and maintaining carbon storage in soil
- · Improving and enhancing biodiversity
- · Increasing food supply resilience against climate and economic events
- · Reducing food miles and food waste
- · Supporting plant genetic diversity
- · Reducing urban heat island effects
- · Feeding urban communities sustainably

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

"Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate." (Paragraph 98).

SUPPORTING INFORMATION 4

National Planning Policy Framework (2021)

"Planning policies and decisions should:

b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;" (Paragraph 120).

SUPPORTING INFORMATION 5

Guidance to the English National Planning Policy Framework

"Local planning Authorities can have a role by supporting opportunities for communities to access a wide range of healthy food production and consumption choices". (Paragraph: 004 Reference ID 53-004-20190722, Revision date: 22 07 2019)

legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

5. 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)

Yes ☑

No, I do not wish to participate in hearing session(s)

No

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The absence of clear policy measures to plan for local food infrastructure within the draft Local Plan shows that the Sheffield City Council Planning Service has failed to access the expertise of the Sheffield citizens and institutions working towards a better food future. As a leading organisation in the development of a healthier, fairer and more sustainable food system for Sheffield, Regather is well placed to participate in the hearing session(s) to advise on these missed opportunities and provide amendments that will help to ensure that Sheffield is best situated to meet the challenges and opportunities of the future.

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Regather

1. To which part of the Sheffield Plan does your representation relate?

Policy Number: Policy D1 - DESIGN PRINCIPLES AND PRIORITIES

2. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant Yes ☑

4.(2) Sound Yes

No ☑

4.(3) Complies with the Duty to Cooperate Yes ✓

No

3. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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Continue on a separate sheet if necessary

SUGGESTED ADDITION

Development should also:

Ensure that land capable of producing food is protected for the purpose of agroecological food production, where land is managed for multiple beneficial outcomes including: environmental services, meeting Net Zero by 2030 and Biodiversity Net Gain.

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft)

"Future access: safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

• The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

- · Protecting soil, improving soil quality, and maintaining carbon storage in soil
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- · Supporting plant genetic diversity
- · Reducing urban heat island effects
- Feeding urban communities sustainably

SUPPORTING INFORMATION 3

Guidance to the English National Planning Policy Framework

"The design and use of the built in natural environments, including green infrastructure are major determinants of health and well-being. Planning and health need to be considered together in two ways: in terms of creating environments that support and encourage healthy lifestyles, And in terms of identifying and securing the facilities needed..." (Paragraph: 001 Reference ID 53-001-20190722, Revision date: 22 07 2019)

SUPPORTING INFORMATION 4

National Planning Policy Framework (2021)

"Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling." (Paragraph 92).

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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5. 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)

Yes ✓

No, I do not wish to participate in hearing session(s)

No

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The absence of clear policy measures to plan for local food infrastructure within the draft Local Plan shows that the Sheffield City Council Planning Service has failed to access the expertise of the Sheffield citizens and institutions working towards a better food future. As a leading organisation in the development of a healthier, fairer and more sustainable food system for Sheffield, Regather is well placed to participate in the hearing session(s) to advise on these missed opportunities and provide amendments that will help to ensure that Sheffield is best situated to meet the challenges and opportunities of the future.

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Regather

1. To which part of the Sheffield Plan does your representation relate?

Policy number: POLICY DC1: THE COMMUNITY INFRASTRUCTURE LEVY (CIL) AND OTHER DEVELOPER CONTRIBUTIONS

2. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1)	Legally Compliant		•	Yes	√
4.(2)	Sound			No Yes	
				No	√
4.(3)	Complies with the Duty to Co	operate		Yes	√
				No	

3. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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Continue on a separate sheet if necessary

SUGGESTED AMENDMENT

Other Developer Contributions Developers of housing schemes comprising 10 or more new homes will be required to contribute towards education facilities, health facilities, open space ***and provision for community food growing***, where needs are not being met through the CIL or other funded capital programmes and where further mitigation is necessary to make the development acceptable in planning terms.

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener - A Food Strategy for Sheffield (draft)

"Future access: safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

 The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

- · Improving human health through physical exercise and a more nutritious diet
- · Mental health benefits of being outside and engaging in community
- · Protecting soil, improving soil quality, and maintaining carbon storage in soil
- · Improving and enhancing biodiversity
- Increasing food supply resilience against climate and economic events
- · Reducing food miles and food waste
- Supporting plant genetic diversity
- Reducing urban heat island effects
- · Paid employment and training opportunities
- Community empowerment
- · Reducing poverty
- Improving community cohesion
- · Feeding urban communities sustainably

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

"Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling." (Paragraph 92).

SUPPORTING INFORMATION 4

National Model Design Code: part 2 - guidance notes

"9) Allotments and community growing: need to consider community growing projects for food production, learning and community engagement on large developments." (p21)

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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5. 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)

Yes ✓

No, I do not wish to participate in hearing session(s)

No

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Regather

1. To which part of the Sheffield Plan does your representation relate?

Policy number: POLICY DE3: PUBLIC REALM AND LANDSCAPE DESIGN

2. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes

No

4.(2) Sound

Yes

No

✓

4.(3) Complies with the Duty to Cooperate

Yes

No

3. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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SUGGESTED AMENDMENT

Landscape proposals should be informed by detailed appraisals of the site, context and local character to help create multifunctional, attractive, legible, well-defined spaces around and between buildings. These should be designed in a manner that is inclusive, dementia friendly, improves vitality and safety, encourages active and healthy lifestyles, ***promotes good mental health through nature access** and enhances biodiversity. Development should therefore ensure that:

SUGGESTED ADDITION

the design for the public realm includes site appropriate edible planting, such as fruit trees, fruiting shrubs and culinary herbs, helping to connect people with nature through edible landscaping

Without these suggested modifications the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

- Improving human health through physical exercise and a more nutritious diet
- · Improving and enhancing biodiversity
- · Increasing food supply resilience against climate and economic events
- · Improving community cohesion
- Feeding urban communities sustainably

SUPPORTING INFORMATION 2

National Planning Policy Framework (2021)

"Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling." (Paragraph 92).

Continue on a separate sheet if necessary

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5. 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)

Yes ✓

No, I do not wish to participate in hearing session(s)

No

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Regather

1. To which part of the Sheffield Plan does your representation relate?

Policy number: POLICY GS4: SAFEGUARDING THE BEST AND MOST VERSATILE AGRICULTURAL LAND

2. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes

No

4.(2) Sound

Yes

No

✓

4.(3) Complies with the Duty to Cooperate

Yes

No

3. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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Continue on a separate sheet if necessary

SUGGESTED AMENDMENT

Where development is permitted on the best and most versatile agricultural land, it should be directed towards the lowest grade of land wherever possible. ***Due to local scarcity, land of Grade 3a and above should be protected for agroecological horticultural production.***

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener - A Food Strategy for Sheffield (draft)

<u>"Future access:</u> safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

 The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

- · Protecting soil, improving soil quality, and maintaining carbon storage in soil
- · Improving and enhancing biodiversity
- · Increasing food supply resilience against climate and economic events
- · Reducing food miles and food waste
- · Supporting plant genetic diversity
- · Paid employment and training opportunities
- · Feeding urban communities sustainably

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

"Planning policies and decisions should enable:

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;
- b) the development and diversification of agricultural and other land-based rural businesses;" (Paragraph 84)

SUPPORTING INFORMATION 4

National Planning Policy Framework (2021)

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; (Paragraph 174)

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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5. 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)

Yes ✓

No, I do not wish to participate in hearing session(s)

No

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Regather

1. To which part of the Sheffield Plan does your representation relate?

Policy number: POLICY GS1: DEVELOPMENT IN URBAN GREEN SPACE ZONES

2. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1)	Legally Compliant	Yes	√
4.(2)	Sound	No Yes	
		No	√
4.(3)	Complies with the Duty to Cooperate	Yes	✓
		No	

3. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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Continue on a separate sheet if necessary

SUGGESTED AMENDMENT

c) safeguard, or not otherwise adversely affect, a greenspace of high amenity ***or of food growing*** value; or

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener - A Food Strategy for Sheffield (draft)

<u>"Future access:</u> safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

• The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

- · Improving human health through physical exercise and a more nutritious diet
- · Mental health benefits of being outside and engaging in community
- Protecting soil, improving soil quality, and maintaining carbon storage in soil
- · Improving and enhancing biodiversity
- · Increasing food supply resilience against climate and economic events
- · Reducing food miles and food waste
- Supporting plant genetic diversity
- · Reducing urban heat island effects
- Paid employment and training opportunities
- · Community empowerment
- · Reducing poverty
- · Improving community cohesion
- · Feeding urban communities sustainably

Continue on a separate sheet if necessary

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Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Regather

1. To which part of the Sheffield Plan does your representation relate?

Policy Number: POLICY IN1 - INFRASTRUCTURE PROVISION

2. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant Yes ☑

No

4.(2) Sound Yes

No ☑

4.(3) Complies with the Duty to Cooperate Yes ✓

No

3. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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SUGGESTED ADDITION

Infrastructure priorities will include:

Agroecological food production - future access to a localised and resilient food system will be secured by working with community partners to identify and develop sites capable of food production and create the services and facilities that enable equitable food provision

Without this suggested modification the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft)

<u>"Future access:</u> safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

• The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

- · Improving human health through physical exercise and a more nutritious diet
- · Mental health benefits of being outside and engaging in community
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- Reducing poverty
- · Improving community cohesion
- Feeding urban communities sustainably

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

"Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling." (Paragraph 92).

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5. 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)

Yes ✓

No, I do not wish to participate in hearing session(s)

No

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Regather

1. To which part of the Sheffield Plan does your representation relate?

Policy Number: POLICY NC15: CREATING OPEN SPACE IN RESIDENTIAL DEVELOPMENTS

2. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

No
4.(2) Sound

Yes

No

✓

4.(3) Complies with the Duty to Cooperate

Yes

No

3. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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Continue on a separate sheet if necessary

(Please note that non-compliance with the duty to co-operate is incapable of modification at

SUGGESTED ADDITIONS

Any new open space that is provided should be:

assessed for community food growing opportunities, in recognition of the mental wellbeing benefits that come from working together in an outdoor environment and the positive health outcomes afforded by easier access to fruit and vegetables.

Missing from Table 2 'Open Space' definitions, ADD

***Community garden**

Urban Farm*

Without these suggested modifications the draft Local Plan does not support the following existing policies:

SUPPORTING INFORMATION 1

Fairer, Healthier, Greener - A Food Strategy for Sheffield (draft)

"Future access: safeguarding our food system by ensuring it produces nutritious food, restores nature, reduces greenhouse gas emissions and is resilient to effects of climate change and other global shocks.

 The Council will work with local communities and partners to identify spaces where food production and food provision can be accommodated"

SUPPORTING INFORMATION 2

Sheffield City Council - Right to Food motion, Urban Agriculture Amendment:

- Improving human health through physical exercise and a more nutritious diet
- Mental health benefits of being outside and engaging in community
- Increasing food supply resilience against climate and economic events
- Community empowerment
- Reducing poverty
- Improving community cohesion
- · Feeding urban communities sustainably

SUPPORTING INFORMATION 3

National Planning Policy Framework (2021)

"Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other
 for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
- b) are safe and access ble, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage wa king and cycling. (Paragraph 92).

SUPPORTING INFORMATION 4

National Planning Policy Framework (2021)

Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate. (Paragraph 98).

SUPPORTING INFORMATION 5

National Planning Policy Framework (2021)

"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions." (Paragraph 119)

SUPPORTING INFORMATION 6

National Model Design Code: part 2 - guidance notes

["]9) Allotments and community growing: need to consider community growing projects for food production, learning and community engagement on large developments." (p21)

examination). You will need to say why each modification will make the Sheffield Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

5. 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)

Yes ☑

No, I do not wish to participate in hearing session(s)

No

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The absence of clear policy measures to plan for local food infrastructure within the draft Local Plan shows that the Sheffield City Council Planning Service has failed to access the expertise of the Sheffield citizens and institutions working towards a better food future. As a leading organisation in the development of a healthier, fairer and more sustainable food system for Sheffield, Regather is well placed to participate in the hearing session(s) to advise on these missed opportunities and provide amendments that will help to ensure that Sheffield is best situated to meet the challenges and opportunities of the future.





19th February 2023

Reference: draft Local Plan

To whomever this may concern,

I'm responding to the draft Local Plan as a member of Regather's Urban Agriculture Task Force. Regather is a co-operative organisation and thriving community of local people working to improve food for Sheffield and contribute to a better, sustainable, shared future globally. We source food directly from our Sheffield based, organically certified farm, and join forces with other local growers and award winning independent businesses across the region to make it easy to shop local and provide high quality, value driven products delivered in our Regather Box.

Regather is at the heart of a 'good food' movement, working strategically, in partnership, to tackle unsustainable and unfair food systems, unemployment, health inequalities and unproductive land use in Sheffield. We are a member of ShefFood Partnership and we have a long standing relationship with The University of Sheffield, including the Institute for Sustainable Food. Regather is a partner within the H3 - Healthy Soil, Healthy Food, Healthy People research programme and also the recently formed South Yorkshire Sustainability Centre.

Sheffield is a member of Sustainable Food Cities and has been granted a Sustainable Food Places Bronze Award in recognition of the great work already achieved across the city. ShefFood is currently working on the SFP Silver Award. Sheffield is held in high regard nationally for being a leader in this field. The draft Local Plan needs to enable the future development of local food infrastructure in line with the aims of Regather and other committed local food partners.

The documentation consulted for the development of the draft Local Plan excludes the Low Carbon Food Infrastructure in Sheffield paper, written on behalf of ShefFood and endorsed by the University of Sheffield's Institute for Sustainable Food. It also fails to take account of Sheffield's involvement in the national Fringe Farming programme, led by Sustain. The coproduced Farming Sheffield's Fringe report explores the many benefits of peri urban agroecology for the city and in July 2021 the Farming Sheffield's Fringe conference was attended by Senior Councillors and the Net Zero Project Director for the South Yorkshire Mayoral Combined Authority.

The draft Local Plan does not reflect the policy objectives included within Fairer, Healthier, Greener – A Food Strategy for Sheffield (draft) co-produced with ShefFood. It lacks recognition of the City Council's declaration of the Right to Food motion (2021), passed with an Urban Agriculture Amendment that recognises the multiple benefits of urban agriculture.

The omission of local food infrastructure within the draft Local Plan is a missed opportunity to position a resilient food system as a core component of building a sustainable city. As a cross cutting issue that encompasses: environment, transport, Net Zero, Biodiversity Net Gain, health and wellbeing, employment and more, agroecological food production delivers multifunctional land use that not only feeds people but also delivers on these other strategic priorities.

Kind regards,



Fran Halsall