

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

Respondent details

Comment ID number: PDSP.125.009

What is your Name: The only viv thom

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

Sheaf and Porter Rivers Trust

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

N/A

Document

Which document to you wish to make a representation on:

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

Which section of the document is your representation on:

Policy BG1: Blue & Green Infrastructure

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

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

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

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

The Policy BG1 and accompanying plan 17 are unsound as they simply describe the existing green-blue network but do not propose a vision or strategy for improvement to connect or extend it into disadvantaged and inner city areas where most of the new housing is proposed in the Plan and restored habitats and greenspaces are most needed.

The supporting Character Area and Priority Housing Sites generally do not show existing riverside trails such as the River Sheaf or Porter Trails, current initiatives or future opportunities.

Reference and reliance is laid on the South Yorkshire Nature Recovery Strategy and its Natural Capital Maps but these are not publicly available.

There is no Character Area Plan for most of the Priority City Arrival Area where significant opportunities for deculverting, renaturalisation and connected public access are available along the Porter Brook.

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

Not completed by respondent

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

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

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

N/A

From: [REDACTED]
To: [SheffieldPlan](#)
Subject: Sheffield Local Plan Consultation
Date: 19 February 2023 18:44:31
Attachments: [Sheffield Local Plan - SPRT Comments - final.pdf](#)

Please find attached the Sheaf and Porter Rivers Trust response to the consultation on the Sheffield Local Plan.

Yours, on behalf of the Trust,

Martin Spiers
Sheaf & Porter Rivers Trust

Sheffield Plan: Our City, Our Future. Publication (Pre-Submission) Draft.

This is a response by the Sheaf and Porter Rivers Trust (SPRT) to the draft Sheffield Plan policy documents dated December 2022.

The Sheaf and Porter Rivers Trust is a charity (registered number: 1193562) that aims to conserve and improve the River Sheaf and Porter Brook in Sheffield for the benefit of the public.

This response is prepared by Martin Spiers on behalf of the trust. For correspondence, please use the email address [REDACTED]

This response covers a number of sections and policies, as set out below.

“Do you consider the Local Plan is legally compliant?”

Yes

“Do you consider the Local Plan is sound?”

We believe that parts of the Local Plan are not sound, as outlined below.

“Do you consider the Local Plan complies with the duty to co-operate?”

Yes

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

Policy CA2A: Priority Location in Castlegate

We support the policy’s commitment to a new public square and riverside greenspace (Castlegate Square) to utilise and protect the heritage assets of Sheffield Castle, to full de-culverting of the River Sheaf, and to the extension of the Grey to Green scheme into Castlegate and along the River Sheaf Walk.

Character Area Four: City Arrival, Cultural Industries Quarter, Sheaf Valley

Paragraph 4.36

Unsound

There is no Character Area Plan for most of the Priority City Arrival Area where significant development sites are shown including opportunities for deculverting, renaturalisation and connected public access available along the Porter Brook.

The text references the Sheaf Valley and Midland Station Development Framework, which was developed at a time when HS2 was planned to bring significant change to this area. Given subsequent changes to proposals, we believe this Framework needs revision.

The Sheaf Valley Development Framework included the re-routing of the A61 between Granville Square and Sheaf Square to the east of the station and the re-routing of South Yorkshire Supertram to the west. These proposals are not shown on the Local Plan proposals map. We would welcome clarification on the status of these proposals.

In the event of this scale of development taking place, we would welcome further opportunities to deculvert, admit daylight and re-naturalise the River Sheaf and Porter Brook for human and wildlife connectivity in this area, in line with policies GS9, ES1 and GS5.

Policy CA4: City Arrival, Cultural Industries Quarter, Sheaf Valley

We support the policy's commitment to incorporating active travel routes, including those set out as part of the Connecting Sheffield programme, but would request that the emerging Porter Brook Trail between the Station and London Road is shown on the Policy Maps, the Priority Site Framework Plans and the individual site allocation policies

Policy CA4A: Part of Priority Location and Catalyst Site at Moorfoot - Land between Eyre Street, St Mary's Road, and Jessop Street

Unsound

We support the Policy's commitment to de-culverting of the Porter Brook on Eyre Street/Mary Street to create a green corridor. We note however that the majority of the corridor towards the Cultural Industries Quarter and the Sheffield Midland Station lies outside the area covered by this policy and therefore suggest text in section c) be moved to Policy CA4 above.

Policy CA5A: Priority Location in Moorfoot

Unsound

We welcome the Policy's commitment to de-culverting of the Porter Brook along Eyre Street. We note however that the majority of the corridor along the Porter Brook lies outside the area covered by this policy and therefore suggest text in section f) be moved to Policy CA5 above.

We note that the "proposals for the Porter Brook Park" referred to in this policy are not outlined further.

Policy CA6: London Road and Queens Road

Unsound

The reference to the Porter Brook in paragraph (d) is incorrect. This should refer to the River Sheaf.

4. 2 Vision, Aims and Objectives

Objectives for a Green City

Unsound

Some of the wording in this section is not strong enough to meet the expectations of NPPF 174, 175, 179 and 182 and Government ambitions and targets for nature restoration and recovery. It also does not reflect adequately the recognition that there is a nature emergency in Sheffield that has to party addressed though the planning system. This is reflected in the Sheffield City Council Motion 'Action on the Nature Emergency' that was passed 16.6.21 which says "(i) *acknowledges the likely challenged to projects within the NEAP from developers under the current national guidelines which severely constrain proper consideration of the Climate and Ecological Emergency and for this reason it is imperative that this Council develops robust policies in the Local Plan which can help to protect and enhance biodiversity.*" (NEAP = Nature Emergency Action Plan). The current wording does also not recognise that nature plays a significant role in climate change adaptation (see definition on p65 of the NPPF) as well as mitigation.

We suggest minor modifications as follows:

"To safeguard and ~~enhance~~ restore Sheffield's unique natural landscape setting....

In order to:

~~'Protect and enhance biodiversity'~~ 'Protect existing biodiversity and measurably contribute to nature's recovery' and

~~'Mitigate climate change'~~ 'Contribute to both climate change mitigation and adaptation'

Policy SP1 Overall Growth Plan

"The Sheffield Plan will deliver:

l) Protection, management and enhancement of designated blue and green infrastructure sites and assets. With a focus on the Green Network (including the Local Nature Recovery Network) and designated Urban Greenspace Zones (see policies GS1 to GS11)"

Unsound

The definition of the 'Green Network' refers to Map 17, however Map 17 is not a Green Network map, it is simply a map of existing green spaces and ecologically designated sites. Neither is it a green infrastructure map or network or strategy and does not show any opportunities for improving or strengthening any networks.

This needs to be improved in line with the newly launched [Natural England Green Infrastructure Framework](#) and does not meet the requirement of para20 of the NPPF "Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: d) conservation and enhancement of the natural, built and historic environment including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation"

Green infrastructure is also included in Para92c) and 154a), 186 and 175 (see below)

Definition on p67 of the NPPF "Green infrastructure: A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity."

A [South Yorkshire Green Infrastructure Strategy](#) was produced in 2011 but this has not been referred to, or updated, and a local Sheffield version has not been produced following the guidance in the Natural England GI Framework

https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Principles/HowPrinciples.as_px and or the Building with Nature Standards for Local Plan policies
<https://www.buildingwithnature.org.uk/planners> <https://www.buildingwithnature.org.uk/project-list-blog/2022/9/29/west-dunbartonshirecouncil-local-development-plan-2?rq=policy>

Neither does the map and accompanying policy make reference to the ‘Access to Nature – capacity and demand maps’ which were developed as part of the South Yorkshire Natural Capital Maps (‘Holt, A.R., Zini, V. & Ashby, M. (2021) South Yorkshire natural capital and biodiversity mapping, Natural Capital Solutions Ltd, July 2021’). This is the most up to date and best quality evidence we have for access to nature and it not referenced.

Also Map 17 does not include the Nature Recovery Network – this need to be separate. Justification – separation of ecological networks and their components to fully satisfy NPPF policies 174/175/179

“174 Planning policies and decision should contribute to and enhance the natural and local environment by:

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. 175. Plans should: distinguish between the hierarchy of international, national and locally designated sites, allocate land with the least environmental or amenity value, where consistent with other policies in this Framework, take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

179. To protect and enhance biodiversity and geodiversity, plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity⁶¹ ; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation⁶² ; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. ⁶²Where areas that are part of the Nature Recovery Network are identified in plans, it may be appropriate to specify the types of development that may be suitable within them.”

We understand that the Nature Recovery Network Maps (created from ‘Holt, A.R., Zini, V. & Ashby, M. (2021) South Yorkshire natural capital and biodiversity mapping, Natural Capital Solutions Ltd, July 2021.) are currently under the ownership of the South Yorkshire Mayoral Combined Authority and have not yet been made available in the public domain and therefore this is partly a matter of timing. Ideally these would be the subject of early public consultation and then submitted with this draft plan to the Planning Inspector in July 2023 with a Supplementary Planning Document (SPD) to follow. However if this is not possible, the maps may also need to follow with the SPD. Nature Recovery Network maps are referred to in Part 2 (8) but there needs to be consistency about reference to maps and strategies in Parts 1 and 2. If this is not possible the Local Plan must include a stronger vision statement and broad spatial strategy for the extension of the network into areas where it is weak or absent.

Suggested minor modifications

- “1) Protection, management and enhancement of designated blue and green infrastructure sites and assets. With a focus on the Green Network (including the Local Nature Recovery Network) and designated Urban Greenspace Zones” *Suggest changing to:*

- “l) Protection, management and enhancement of blue and green infrastructure sites and assets including designated sites and Urban Greenspace Zones (see Map 17, policies map and policies GS1 to GS11) and the creation of new assets, especially where provision is low”
- *Change the name of Map 17 to Blue and Green Infrastructure as it is not a network and may be confused with the nature recovery network– make the blue infrastructure clearer (waterways are not showing up as they are also LWS) and add opportunity sites.*

add new para as follows:

- Identification, protection, enhancement and restoration of ecological networks: the Local Nature Recovery Network in line with the Local Nature Recovery Strategy/Nature Emergency Action Plan (GS5)

Blue and Green Infrastructure

“5.24 Sheffield’s blue and green infrastructure is important at all scales and is represented on Map 17”.

Unsound.

As previously commented – Map 17 does not show Blue & Green Infrastructure

Policy BG1 Blue and Green Infrastructure

Unsound.

For the reasons outlined in Part 1, we suggest the following minor modifications

*Suggest adding **and the Nature Recovery Network** to the title*

Suggest changing: ‘Very significant weight will be given to the protection and enhancement of Sheffield’s Green Network of urban greenspace and countryside (including the Local Nature Recovery Network) especially,..’

to: ‘Very significant weight will be given to the protection, extension, connection and enhancement of Sheffield’s Blue and Green Infrastructure and Local Nature Recovery Network, especially...’

Suggest addition “Valuable greenspaces will be protected from inappropriate built development and are shown on the Policies Map as either Urban Green Space Zones (policy GS1), Greenbelt (GS2) or designated ecological or geological sites (GS5)”

Suggest addition ‘New high quality green infrastructure that meets standards is encouraged’ *Such as [Building with Nature](#)*

This Policy requires expansion to include a recognition of the heritage significance of blue/green infrastructure and the importance of protecting these.

Policy GS1 Development in Urban Green Space Zones

We support this policy in general but note that

“In Urban Greenspace Zones, development should:

b) not cause or increase a break in the city’s network of blue and green infrastructure”

As previously described in our response to Part1 – there is no clear blue and green infrastructure network in either map or strategy form.

Unsound

Suggest rewording to

b) not cause or increase or fail to reduce a break in the city’s network of blue and green infrastructure

Table 4. Standards for Assessing the Quantity of and Access to Information Greenspace and Outdoor Sports Areas

Refers lists ‘Access Standards’ but it is very unclear for the reader where this list has come from. Only by delving into the Supporting Evidence ‘Sheffield Open Space Assessment 2022’ where it is clear that is the consultant report has identified that Sheffield does not meet the Natural England Accessible Greenspace Standards (ANGST) e.g. see Section 7.3.2 and Figures 12-14 in the Assessment. Instead of taking steps to address these gaps in provision in the allocation map or policies, a lower standard of 15minute walk time to an accessible natural greenspace has been suggested in the Assessment. There is no explanation of this in Part2 and no strategic policies to address the gaps identified by both ANGST and this locally suggested lower standards (Figure 11).

Neither does the map and accompanying policy make reference to the ‘Access to Nature – capacity and demand maps’ which were developed as part of the South Yorkshire Natural Capital Maps (‘Holt, A.R., Zini, V. & Ashby, M. (2021) South Yorkshire natural capital and biodiversity mapping, Natural Capital Solutions Ltd, July 2021’). This is the most up to date and best quality evidence we have for access to nature and it is not referenced.

Policy GS3: Landscape Character

Unsound

This policy requires expansion to recognise the heritage significance of blue/green infrastructure.

Policy GS9: Managing Flood Risk

Flood Risk Management for Development Sites

“New Development will be permitted where...

a) Is set back from any watercourse (and/or any flood defences on the site) to allow for future maintenance and biodiversity:

- For Main Rivers as agreed with the Environment Agency but a minimum 8m from top of the bank and any flood defences on the site) either side
- For ordinary watercourses as agreed with the LLFA but a minimum of 3m from top of the bank (and any flood defences on the site) either side; and

Unsound

All main Rivers, and many ordinary watercourses in Sheffield are key ecological corridors and are designated as Local Wildlife Sites so should be adequately protected and buffered. NPPF 174b

“minimising impacts on and providing net gains for biodiversity, including by establishing ecological networks that are more resilient to current and future pressures’ and 174e “preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans”

There is also a requirement in the NPPF to conserve and enhance the historic environment (Paragraphs 189 to 208). In some cases, there is a need to balance these requirements along with the Council’s long-held objective of establishing a network of riverside walks although these objectives are not necessarily incompatible as shown in the Porter, Rivelin and Loxley Valleys.

Where heritage assets are present, these should be maintained and refurbished where possible. The size of any riverside easement, whether including a riverside path or not, is likely to be constrained by the existing structures.

Where possible we would advocate for the allocation of one bank to nature and one to public access.

Where ecology is the main driver, we would advocate for a set back complying with the Environment Agency response in relation to a Planning Appeal for a site in the Loxley Valley in Sheffield (Appeal APP/J4423/W/20/3262600) where the Environment Agency stated “a minimum undeveloped 10 metre wide buffer zone alongside the River Loxley.... The buffer zone scheme shall be free from built development including lighting, domestic gardens and formal landscaping”

Where new riverside access is being provided, we would advocate for this to be within the easement provided for watercourse maintenance to facilitate public access to the water edge where possible.

In addition, further guidance/policy is needed about demolition and replacement or redevelopment of existing buildings which currently do not have a buffer to the river.

Suggested rewording

New development will be permitted where it:

- is set back from any watercourse (and/or any flood defences on the site) to allow for future maintenance and biodiversity. for Main Rivers as agreed with the Environment Agency but a minimum 8 metres from top of bank (and any flood defences on the site) either side
- for ordinary watercourses as agreed with LLFA but a minimum of 3 metres from top of bank (and any flood defences on the site) either side; and
- This will not apply to refurbishing buildings of heritage value
- The set back should be undeveloped except to contain, where appropriate, a riverside multi-use path

c) minimises culverting and no building over open watercourses wherever practicable; and”

Unsound

weak wording

Suggest replacing with

c) Avoids culverting of and building over open watercourses including ephemeral watercourses, and avoids changing groundwater pathways. Where possible and compatible with retaining heritage assets and ecological considerations, existing culverts should be removed

Add in “Overland water should be retained on the same flowpath after development and not diverted into the drainage and sewer network”

Policy GS10: Protection and Enhancement of Water Resources

Unsound

There is a danger that over-zealous application of the WFD objectives may lead to the removal of heritage assets within the water environment such as dams and goyts many of which actually provide a richer variety of aquatic habitats .

Suggest adding

f) While maintaining heritage assets

Protection & Enhancement of Water Resources

8.34-8.36 and GS10

Can SCC add supporting text or policy wording to continue these commitments if the WFD requirements are repealed from UK Law as a result of Brexit and not replaced with the same or a higher level of legal requirements.

“GS10 Protection and enhancement of Water Resources

New development must support the objectives of the Water Framework Directive and Humber River Basin Management Plan.”

Unsound

Suggested minor amendment

“New development must support the objectives of the Water Framework Directive and Humber River Basin Management Plan – even if these objectives are no longer required by law during the lifetime of the plan. New development should also support the objectives of the [Don & Rother Catchment Management Plan](#) and the [Sheffield Waterways Strategy](#). “

“GS10 Protection and enhancement of Water Resources

Unsound

Requires reference to impact to water quality. E.g. Microplastic don't directly impact aquatic ecosystems, but are covered in water quality.

Suggested minor amendment

“c) not increase the risk of any pollution entering a nearby water body through water run-off or discharge resulting in harm or deterioration to the aquatic ecosystem, **to water quality**, and any drinking water supplies “

Site allocations

We note that the Castlegate site itself is not identified as a development site within the Local Plan.



Site CW02

Unsound

We note that the culverted River Sheaf runs beneath this site and this should have its ecological value enhanced in line with Policy GS9. This should be added as a condition on development.

Site SV02

We note that the conditions on this site include

“The watercourse should be deculverted and enhanced “

Unsound.

Weak wording.

The stretch of the Porter Brook adjacent to this site is already deculverted but is heavily canalised.

Site SWS02 and SWS05

Unsound.

We note that these sites are adjacent to the Porter Brook and there is no mention of previous planning commitments to deliver the relevant section of the Porter Brook Trail.

Site LR02

“The adjacent watercourse should be protected and enhanced “

Unsound

Weak wording. Suggest replace with “shall have its ecological condition improved”

Site LR06

“Connective ecological corridors/areas (including buffers) shown on the Local Nature Recovery Strategy and combined natural capital opportunity maps are to be maintained on site and removed from the developable area. “

Unsound

As referenced elsewhere, the lack of publication of the Local Nature Recovery Strategy and combined natural capital opportunity maps makes this statement worthless.

Lavers Site, Little London Road

We note that this site is likely to become available for redevelopment due to the closure of the previous business occupier and is not included in the Site Allocations. Adding it will allow conditions on development to be defined, which should include completion of the relevant section of the Sheaf Valley Trail to link the “cycle path to nowhere” from Broadfield Way (not currently shown) through to Little London Road.



General comments – proposal map

Unsound

The proposal map is inconsistent in its depiction of existing cycle routes. For instance, the existing cycle and footpath route through Hutcliffe Woods from Abbey Lane to Hutcliffe Wood Road recently constructed by the Council is not shown.

