

**From:** [REDACTED]  
**To:** [SheffieldPlan](#)  
**Cc:** [REDACTED]  
**Subject:** Response to Sheffield City Council Draft Local Plan  
**Date:** 17 February 2023 11:05:49  
**Attachments:** [Sheffield City Council Draft Local Plan Response.doc](#)

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Dear Sir/Madam,

Please see attached our response to the Sheffield City Council Draft Local plan

Best wishes,

Joe

**Joe O'Donnell**

Director

**The Victorian Society**

[REDACTED]

[REDACTED]  
[victoriansociety.org.uk](http://victoriansociety.org.uk)

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# **THE VICTORIAN SOCIETY**

The champion for Victorian and Edwardian architecture

## **RE. Response to the Sheffield City Council Draft Local Plan**

### **Introduction**

We are the only charity dedicated to fighting for our Victorian and Edwardian heritage. We have a formal role in the planning system by virtue of the Secretary of State's Arrangements for handling heritage applications Direction 2015. We help tackle the climate emergency by campaigning for the sensitive reuse or repurposing of historic buildings to ensure much lower carbon emissions than demolition and rebuild.

Our Conservation Advisers, guided by experts on our Southern Buildings Committee, Northern Buildings Committee and our local Casework Committees, help avoid needless harm to Victorian or Edwardian buildings.

The reuse of our wonderful historic buildings, rather than wasteful demolition and rebuild, is key to a sustainable future.

We recognise that Sheffield alongside all our districts has a wealth of Victorian and Edwardian heritage, derived from the huge growth of the industrial revolution, that deserves to have a second life, repurposed for alternative uses in the future.

### **Contents**

We are commenting in this response on four areas of direct concern:

- The Local Plan's - Visions, Aims, and Objectives
- The Local Plan's - Aim 8 "A well-designed city"
- A new Positive Strategy for Heritage
- A new Policy Statement on the Local Heritage List
- A robust Statement on Development Options Hierarchy

### **Visions, Aims, and Objectives**

From the Local Plan - *"Our vision is that, by 2039, Sheffield will be an economically stronger, fairer, more inclusive and sustainable city. It will be playing a nationally significant economic role at the heart of its region, with thriving neighbourhoods and communities, and have a distinct urban and rural identity."*

[REDACTED]

*“Income and health inequalities will be significantly reduced and we will already have achieved net zero carbon status by 2030.”*

*“It will be the destination city, major employment centre and academic and cultural heart of the city region”*

In 2020, the heritage sector in England contributed over £14bn GVA to the national economy, ahead of major sectors such as aerospace and defence<sup>1</sup>. Heritage stimulates spending by visitors and influences business location decisions. The historic environment attracts the most productive and distinctive businesses, creates demand and premiums for property, and brings in customers and workers. We need to understand and publicly state how Sheffield performs in this economic sector and create policies that support a greater contribution to the city's economy from the heritage sector.

**Aim 8 “A well-designed city”** - This now includes encouragement for a reputation for valuing heritage assets, this is welcome. The plan also contains some positive provision for heritage, including:

- Encouraging the retention and re-use of buildings (policy ES1), although there is a lack of a requirement for Whole Life Cycle Carbon Assessments
- Policy on geo-diversity (GS8);
- Placing heritage at the head of design policy as part of the Council's vision, overall aims, and objectives; and articulating the scope of the city's distinctive heritage (policy D1);
- A common policy for both designated and non-designated heritage assets (policy DE9);
- Acknowledgement of heritage impact in some policies not primarily concerned with heritage (ES2, ES3, NC9, GS1, GS2, GS3, DE1, DE5, DE6, DE7), or in their supporting text.

Although there is this thread of heritage comments throughout the Local Plan, there is no overall strategy statement about heritage. This needs to be addressed separately, to ensure a common understanding of what we mean by heritage. It should include more than just buildings of architectural merit but also buildings & sites of historical significance, green spaces and parks & gardens, monuments in place or removed in the past, rural landscapes shaped by historical impacts (watercourses, water power infrastructure & industry, to name but a few).

We suggest therefore that there is a particular need for a positive strategy for the conservation and enjoyment of the historic environment, as required by the National Planning Policy Framework<sup>2</sup> (NPPF) paragraph 190. The reference to the NPPF positive

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1

Source: Historic England, Heritage and the Economy 2020 (and related publications), available at <https://historicengland.org.uk/research/heritage-counts/heritage-and-economy/>.

2

strategy requirement appeared in an earlier draft but has since been removed. This is a retrograde step and it should be returned to this draft to ensure the Local Plan remains 'sound' and consistent with national policy.

## **A Positive Strategy for Heritage**

The approach suggested by **Joined Up Heritage Sheffield** should be considered, reiterated here:

### **Positive strategy for heritage**

A policy is needed describing a positive strategy for the conservation and enjoyment of the historic environment, including provisions such as:

- (a) Identifying new or extended Conservation Areas, proposals for enhancing the historic significance of existing areas, and other activities within the statutory duties of the Local Planning Authority<sup>3</sup>;
- (b) Encouraging or requiring developments involving heritage assets to include information boards or means of increasing public appreciation of the asset;
- (c) Identifying assets, asset groups or areas in which developers will be expected to restore historic fabric, for example shopfronts;
- (d) Taking advantage of Heritage Action Zones and other initiatives by Historic England and other bodies that promote heritage-led regeneration;
- (e) Setting standards for completeness and accuracy, such that Heritage Statements can aid creation and maintenance of the Historic Environment Record (HER), expected to become a statutory requirement;
- (f) Using heritage to support businesses, especially (but not exclusively) those in the hospitality sector, and rebuild our economy;
- (g) Heritage-based neighbourhood engagement and knowledge-sharing initiatives to foster stewardship and a sense of belonging, especially in areas with fewer recognised heritage assets, to create more sustainable communities.

### **Supporting text**

Insert supporting text on the importance and benefits of heritage 4.2 (unless used elsewhere).

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National Planning Policy Framework published July 2021, available at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>.

3



## Local Heritage List

The Victorian Society, welcomes the introduction and ongoing development of the Local Heritage List. This is currently administered by the South Yorkshire Archaeological Service and identifies heritage assets that are valued as contributing to the distinctiveness and history of South Yorkshire but that are not protected by statutory national designations, such as Listing or Scheduling.

We recommend that this is supported by a specific policy statement within the Local Plan to strengthen the protection it can offer to 'non-designated' heritage assets and bring any listed asset to the attention of developers at an early stage, to mitigate problems further down the planning process. The policy should be a robust statement of the benefits of appropriate and sustainable development of heritage assets of all categories and the expectations that developers should have around their responsibilities in this aspect of any planning application.

It should also address the supporting text, to be revised to include further robust statements of the value of heritage, its contribution to economic, social and environmental sustainability, and the reasoning behind the policies.

## Development Options Hierarchy

There is a clear need to reinforce and robustly support a clear statement on the priorities of the Planning Authority with regard to potential development options. It should be restated regularly, throughout the Local Plan, that the first option should always be retention, reuse & re-purposing of heritage assets. Similarly, it should be restated regularly, throughout the Local Plan, that the last option should always be demolition & rebuild.

In addition, where demolition or damaging proposals are being considered or mooted, detailed and **verifiable** evidence must be available to the Planning Authority and to the public. Demolition is a final act that permanently removes valuable heritage assets from the landscape and should only be sanctioned where there is clear evidence that the need to demolish is a last resort and all other options have been explored and rejected, alongside reasons and evidence for that decision.

Yours sincerely,

Guy Newton

**Conservation Adviser**

