

From: [REDACTED]
To: [SheffieldPlan](#)
Subject: Local Plan - Upper Don Trail Trust - Comments on the Draft Sheffield Local Plan
Date: 20 February 2023 10:34:00
Attachments: [UDTT comments on Local Plan PDF.pdf](#)

Please find attached our comments on the Draft Local Plan by The Upper Don Trail Trust.
Can you please confirm receipt of this information.

If there are any queries, please do not hesitate to contact me.

Kind Regards

Yvonne McMenemy

Upper Don Trail Trust Secretary

[REDACTED]

[REDACTED]

Comments on the Draft Sheffield Local Plan by the **Upper Don Trail Trust**

We believe that Draft Plan is legally compliant but unsound in that it fails to set out clear and consistent policies and spatial plans particularly in respect of Green and Blue Space Network to support its declared objectives of

- a) concentrating new house building in the inner city and brownfield sites whilst Background
- b) Protecting and enhancing the Green-blue network
- c) Restoring bio-diversity and wildlife connectivity
- d) Promoting active travel and healthy lifestyles
- e) Making the most of Sheffield's distinctive landscape setting

We also believe that Policy H1 is unsound as it fails to recognise the need for a permanent site to accommodate New Age Travellers currently occupying land at Wardsend.

Who we Are

The submission is made on behalf of the Upper Don Trail Trust, is a registered charity which was established in 2004 to promote public access to the river Don, initially between Sheffield centre and Oughtibridge. In 2018 it was relaunched with an extended scope to take on board major new opportunities to extend the trail into the Peak District along the Don and Little Don to Stocksbridge Underbank and Langsett including a significant section now completed by Barnsley MBC.

We work with a variety of funders and stakeholders including Sheffield and Barnsley Councils, Sustrans, Trans Pennine Trail, Stocksbridge Towns Fund, Oughtibridge Parish Council, KINCA, Friends of Wardsend Cemetery, Friends of Parkwood Springs and developers Bloor, David Wilson and Citu.

Our aim is to secure a continuous mainly off-road, safe route along one bank of the river within a connected chain of green spaces and corridors for the purposes of active travel, improved river management and stewardship, better water quality and bio-diversity, revealing heritage and the enjoyment of easily accessible 'outdoor city' pursuits such as walking, running, kayaking, fishing, climbing, cycling and horse riding.

We believe that the Trail will make a positive contribution to improving health and wellbeing, reduced car use and new opportunities for communities along the whole UD Valley serving places such as Burngreave, Neepsend, Parson Cross, Fox Hill, Hillsborough, Wyn Gardens, Oughtibridge, Wharnccliffe, Deepcar and Stocksbridge. It will also support the Local Plan's central proposition of concentrating new housing mainly in the inner city, central area and reclaimed brownfield land such as at Deepcar and Oughtibridge.

Context

Our rivers are one of Sheffield's defining features, shaping its dramatic valley landscapes, providing the motive power for its first industrial revolution and water for its subsequent steam age and so largely determining the location of industrial and commercial buildings.

The progressive reclamation of those rivers from the negative impacts of industrial use have been a feature of planning in Sheffield at least from the first Abercrombie Plan of 1922 which introduced the concept of 'River Parkways' which were then progressively created and extended along the upper

reaches of the Sheaf, Porter, Rivelin and Loxley. These green corridors now form one of the most distinctive, treasured and well-used attributes of west and south Sheffield.

Despite considerable further progress on opening up and restoring the inner city waterways since the 1980s, much of it driven by the voluntary and environmental sector, there is still so much to do. New opportunities continue to arise particularly in the Upper Don Valley through redevelopment of former extractive and industrial sites in the city centre, Neepsend, Oughtibridge, Deepcar and Stocksbridge.

There is also a greater urgency to make room for and restore the rivers driven by climate emergency, catastrophic loss of bio-diversity and the need for people to walk, cycle or run more as part of more healthy and sustainable lifestyles.

Sadly in our view this positive, multi-functional and very popular vision of growing a coherent, connected, well-cared-for network of green-blue spaces is actually less clearly presented in the latest Local Plan than in many previous plans such as the SDC's Planning Framework 1991, the 1998 UDP, the 2009 Core Strategy and the 2014 Waterways Strategy. Yet the vision is actually even more relevant and important now in light of climate change, bio diversity loss and the planned redensification of the inner city.

The 2023 Local Plan

Whilst the tone of the current policy GS1-GS11 and BG1 are positive with regards to the Green and Blue network the policies are spatially very generic and largely descriptive rather than aspirational. They give the impression that the green-blue network is more or less already complete and that the function of policy is to 'safeguard and enhance' what is already available and accessible.

But the green and blue network is far from complete. There is far more work to do to extend the quantity and quality of these promising routes, particularly in less favoured parts of the city, several of which are identified in the plan for large numbers of new homes.

The new Local Plan needs to clearly specify and instruct such initiatives to be delivered wherever opportunity arises and to identify at least the key opportunity sites where this either is or could be implemented.

The accompanying Green Space Network map 17 simply records what is there now at a very small scale with no indication of how rivers or greenspaces could be improved for biodiversity or human benefit by better connectivity and restoration. Nor does it identify any of the many current initiatives to achieve these objectives which show that the policy is deliverable.

There is only a passing mention that this expanded network will have other important benefits for the proposed re-densification of the inner city which is the overwhelming driver for this plan.

The new Local plan needs to set out broadly what improvements should be made. It should link the benefits from green and blue infrastructure routes much more explicitly with city policies on improving health inequalities, active travel, flood management and more opportunities for sustainable tourism, stewardship and greening the city. It should also acknowledge the role of other agencies and registered charities involved in this work.

The Plan should also adopt and commit to deliver Natural England's Green Infrastructure Standards for England (2023)

The Policy Plans

The main Policy Plans show a similar lack of focus on the green-blue corridors.

Existing public access to waterways is only patchily and inconsistently shown, mainly only when it is considered to be a cycleway. There is no acknowledgement of the many valuable and hugely well-used riverside walking trails which are often promoted and looked after by willing volunteers.

Feb 2023

Substantial sections of the Upper Don Trail are already in place between Langsett and the city centre, much of it constructed by Sheffield and Barnsley Councils with much more planned or under construction by developers and by Stocksbridge Towns Fund. Yet none of this is mentioned anywhere in the text or plans. Other connecting river trails are also similarly ignored including the Trans Pennine Trail, Ewden Valley Trail, Loxley Valley, Five Weirs Walk and Canal Towpath,

Particularly concerning is the omission from Policy Maps of some sections of the Upper Don Trail that are required by recent planning conditions (and under construction!). Errors such as these fail to give certainty to developers, showing instead a weak commitment by the Planning Authority to its own planning decisions.

Character Areas

The Character Area policies, especially for the city centre, are a section where one might expect to see positive references to the Upper Don Trail which passes through several areas identified as a priority for new housing development such as CA1 Kelham Island, Neepsend, Philadelphia, Woodside and SA2 North West .

Yet for example Policy for Area CA1 whilst referring in general terms to opportunities for green-blue space, cycling and walking and a possible new riverside park, it does not mention the adjacent existing Upper Don Trail, does not show it on the accompanying plan, does not show how its proposals link to the existing trail up and downstream and does not highlight the potential that only the trail offers to link this priority housing area via largely off-road routes to nearby greenspace at Wardsend, Parkwood, Beeley Woods and the open countryside.

This seems to be a peculiar blind spot, but it is reproduced consistently in the plans and policies for other areas along the Upper Don at Oughtibridge and Deepcar (SA2), as well as on the Lower Porter at City Arrival and Moorfoot and on the Lower Sheaf London Rd/Queens Rd area.

Allocated Sites

Turning finally to the specific guidance for each Priority Site the plan identifies, those on green-blue corridors include a standard policy clause

‘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.’

Whilst at first this seems to offer a somewhat more positive site specific approach, it is vague and generic. Unfortunately the ‘Natural Capital Maps’ referred to and forming part of the Local Nature Recovery Strategy have yet to be completed or released by the South Yorkshire Combined Authority. Therefore these maps can’t be referenced to understand whether they actually fulfil the important task the plan proposes. There is at least some doubt about whether they will actually be sufficiently detailed or pro-active for the purpose. Those already produced by Manchester Combined Authority as an advance pilot for instance do not seem to fulfil this function as major urban opportunity sites are not identified.

In light of this we believe this is too uncertain and passive a way to approach such an important underpinning element in the re-densification of the inner city and restoration of bio-diversity, by essentially outsourcing it to another agency and placing it outside the current consultation process.

In our view the Sheffield Plan Policies GS1 to GS11 must be expanded at least spell out what we expect from this NR strategy in the specific local development context, backed up by an ambitious overarching vision plan which gives it some spatial definition and relates to other city-wide strategies for infrastructure such as flood management, and sustainable travel. Opportunity sites for the extension and enhancement of the Green Blue Network should be explicitly identified with more than the generic catch-all clause quoted above.

Feb 2023

Priority Housing Site Plans

Looking at the site-specific guidance for the allocated Priority Housing Sites – arguably the key driver of the plan, none of these recognise the full opportunity offered where they include a green corridor or waterway. For example Site Reference: KN27 at Penistone Rd/Rutland Way – the former Osborns/ Hydra Tools site simply uses a standard formula common to all:

‘Riverbank should be naturalised/enhanced and bankside connectivity maintained and/or enhanced.’

The reference is so brief, vague and lacking in context and specificity as to be almost meaningless and is open to a wide variety of interpretations. The accompanying plan fails to clarify the concept spatially or show how this and adjoining priority sites could provide a key links in the Upper Don green corridor linking new and existing housing areas to Parkwood Springs, Wardsend, Beeley Wood and the Upper Don Valley countryside. This is surely a key infrastructure requirement in making the new (and existing) inner city housing areas successful, attractive and sustainable.

Gypsy and Traveller Sites

We are very surprised that the policy H1 on provision of new gypsy and traveller sites refers only to a demand for an additional site for travelling showpeople which is proposed to be located at Beighton. No mention is made of the substantial unauthorised traveller site which has occupied part of the Upper Don Trail on Club Mill Road at Wardsend for the last four years since the Council evicted some 30 families from a site at Parkwood Springs. Their site is not only a major barrier to the use of the public cycle-footpath which is part of the Parkwood Master Plan and UDT but is also a hazardous location for the occupiers themselves without any sanitary facilities and subject to severe flood risk.

We request that the provision of a safe and official site for this group which includes children and other vulnerable people also needs to be endorsed and built into the Local Plan Policy.

Summary

The plan as it stands is in our view unsound because of these omissions and requires a significant review taking on board and expanding on the ambition, vision and clarity for the green and blue space network shown by earlier approved Council plans. In particular it must address the benefits of river restoration and continuous public access to the Upper Don corridor in meeting the new challenges of new housing neighbourhoods, encouraging active travel, addressing climate change, rebuilding bio-diversity, promoting stewardship and supporting healthier lifestyles by making the most of local distinctiveness. It must also propose a solution to the absence of provision for ‘New Age’ travellers.

The plan should contain

- a) GS1-GS11 a much more positive and proactive vision for the extension and connection of Green and Blue Corridors particularly in the north, east and inner city
- b) clear and consistent policies building on those in previous approved plans and current public, private and voluntary initiatives
- c) the policy maps and more detailed framework plans should show progress, approved proposals and ambitions for the Upper Don and other Green-Blue Corridors
- d) H1 proposals for permanent of a permanent site for the travellers currently occupying the Upper Don Trail at Wardsend

