

From: [REDACTED]
To: [SheffieldPlan](#)
Subject: Response to Sheffield Draft Local Plan - February 2023
Date: 09 February 2023 16:13:13
Attachments: [SheffieldLocalPlanFeb23.docx](#)

Please find attached my response to the Sheffield Draft Local Plan.

Thank you,
Carol Collins, (Mrs)

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Response to the Sheffield Draft Local Plan – (Regulation 19 Publication Draft) February 2023.

I am aware that, at this stage of the process, I am only allowed to comment on the legality and soundness of the draft plan. Overall I have no reason to believe that the plan is not legally compliant and sound, and I have expressed support of several sections.

There is, however, one area where I am not convinced that the plan is “sound” in the sense that I doubt whether it will achieve what it sets out to do in terms of biodiversity net gain. Policies supposedly protecting nature have been included in development plans across the country for decades but have had remarkably little effect – our wildlife continues its catastrophic decline in both town and country. Unless there is a radical change of attitude towards wildlife everywhere, this situation is not going to change. Whilst this plan includes policies aiming at Biodiversity Net Gain of 10%, and talking about “enhancing” sites, it doesn’t feel as though the essential change of attitude from simply trying to protect what remains, to making a major effort to think about how to attract wildlife into each and every development, has really happened. Do planning officers have the necessary knowledge to recognise what exists and to know what else might be encouraged into any particular location? Does the City Council have enough ecologists to be able to guide the process? I very much hope I am wrong, but I suspect that there needs to be more detail in this plan on just how the necessary turn-around for nature in Sheffield is to be achieved.

Comments on specific parts of the Draft Plan

2.1 The Vision – Our City in 2039

There is much to commend in the Vision, but absolutely no mention of nature/biodiversity. Even under **2.7 Sheffield’s reputation as The Outdoor City** there is nothing. Why not? Our loss of wildlife is recognised as catastrophic and it surely has to be a fundamental part of the vision of this plan to do as much as possible to restore it?

2.12 Aims and Objectives. Aim 7 – A Green City.

“To protect and enhance biodiversity” is included in the objectives supporting **Aim 7 “A Green City”**, as is “to mitigate climate change” but only after the aims for humanity of “provision of outdoor recreation and improvement of health and well-being”, and only at the minimal level of improving biodiversity by at least 10%. It doesn’t sound as though an increase in biodiversity is anywhere close to the top of the agenda.

3. Growth plan and Spatial Strategies.

I very much support the overall aim of increasing housing density in the central area and reusing brownfield sites to minimise the need to develop greenfield sites, whether within the urban area or beyond it. I also support the development of housing sufficiently close to employment areas to minimise the need to commute, and to encourage walking/cycling and use of public transport.

POLICY T1 – ENABLING SUSTAINABLE TRAVEL

I wholly support the policy of encouraging and enabling sustainable travel. As a resident of Hathersage I am extremely grateful for the bus and train services between Sheffield and the Hope Valley.

POLICY BG1 – BLUE AND GREEN INFRASTRUCTURE

I wholly support the policy of protecting Sheffield’s Blue and Green Infrastructure, and especially welcome the statement “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...”. Policies of protecting such sites have been in place all over the country

for decades, yet our wildlife has continued to decline, so it is absolutely vital that “enhancement” is as much a part of the policy as “protection”.

Design Principles and Policies

Policy D1

I support the many worthy aims of this policy but:

First, it repeats several paragraphs verbatim – it need not be nearly so long.

Secondly, (and much more importantly) it includes absolutely no mention of biodiversity. Surely it needs to be a basic principle of all design, whether new-build, renovation or extension, that it includes features to encourage as much biodiversity as possible? Unless every new or renovated building is attractive to wildlife (through the provision of built-in nesting sites (eg swift bricks), living spaces (eg bat boxes), foraging areas (eg hedgehogs routes) etc., etc., incorporated at the design stage, as well as green roofs, areas of shrubbery and so on, included wherever possible, there simply will not be a sufficient increase in biodiversity.

Part 2 – Development Management Policies

Policy GS5 – Development and Biodiversity

Whilst I support all the statements in this policy, it seems that they refer specifically to sites which are scheduled or recognised as being part of the Green Network. To have any chance of increasing biodiversity throughout the city, should they not apply to all development? I welcome the inclusion here of:

l) incorporate design features that enhance biodiversity

but feel that it should also be included in Policy GS6 so as to apply to all development.

Policy GS6 – Biodiversity Net Gain

I support the statements in this policy but am concerned that it shows no awareness of the particular species which depend on buildings and are likely to be displaced through the redevelopment of brownfield sites. Swifts in particular are totally dependent on buildings for nesting sites and, because they are resident for only three months of each year and their nests are not visible externally, are often not picked up in surveys. A knowledge of where they nest and the replacement of nests with swift bricks built into new development can provide homes both for swifts and many other hole-nesting birds such as sparrows which depend on buildings.

I hope there will be supplementary planning documents produced along with the Local Plan to provide expert guidance on surveying before demolition and incorporating swift bricks etc. into new buildings?

Policy GS7 – Trees, Woodlands and Hedgerows

I support this policy, in particular the protection of and, where necessary, replacement of the amazing street trees of Sheffield.S32

Carol Collins (Mrs)

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Whilst I am not actually resident in Sheffield, I spend a lot of time there and am a frequent user of its public transport (trains and buses), shops, libraries and so on, as well as having family living in the city.