From:
To: SheffieldPla

Subject: Comments on Sheffield draft Local Plan

Date: 19 February 2023 17:00:54

I would like to have the following comments on the draft plan considered and implemented.

Policy SP1: Overall Growth Plan

Section (m) omits any mention of non-designated heritage assets, many of which may be as significant as designated assets. This section should be amended to correct this.

The Plan should specifically reference a commitment to the Local Heritage List (see under DE9 below).

Policy BG1: Blue and Green Infrastructure

This prioritises blue and green infrastructure "to help increase biodiversity" but doesn't relate this, in the river corridors, to protection of historic water-power heritage assets. Sheffield Waterways Strategy recognises the importance of the industrial heritage of the water-power sites along Sheffield's river valleys, emphasising their potential to be considered a cultural landscape of World Heritage importance. This policy should include reference to the significance of the industrial heritage of the river valleys.

Policy DE9: Development and Heritage Assets

This policy needs to include a section which addresses the need for protection, management and enhancement of heritage assets included on the Local heritage List, with a commitment to maintaining and updating the list regularly.

Policy GS6: Biodiversity Net Gain

A specific commitment should be included to ensure that all works aimed at increasing biodiversity within river and streams, including intrusive works to historic heritage assets such as weirs, should not normally be permitted unless all other non-destructive options have been investigated. If works are permitted, there should be a requirement for appropriate archaeological investigation, recording and reporting.

Policy GS7: Trees, Woodlands and Hedgerows

Where a new development includes woodland activities such as thinning, felling and replanting with native species, they should take account of and avoid any negative impacts on designated and non-designated assets within the areas of proposed works at the earliest possible stage. The wording of f) should be amended to make this requirement clearer. To ensure this is secured, a commitment to require a formal consultation in advance for such works should be included.

Policy GS9: Managing Flood Risk

There are concerns over the principle "New development will be permitted where it "...d) enables removal of any existing culverts and structures over watercourses wherever practicable". Projects to remove culverts, such as is underway on the Sheaf at Castlegate, should be welcomed. However, as worded here, this could be misunderstood as including weirs and other structures which are significant elements of the water power sites along the rivers which form a major part of the city's important industrial heritage. There is thus the potential for their survival to be threatened and condoned by this element of the policy. This part should be reworded to ensure that removal of structures associated the historic metal-working heritage of Sheffield's river valleys – such as weirs, goits and dams - will normally

be refused. Any removal, whether whole or in part, should only be approved if the structure has first been assessed for its significance in the city's industrial past and the impact mitigated.

Archaeological sites not included under "Heritage Asset". Amend this entry to include "archaeological sites, monuments and structures, both above and belowground".

Jim McNeil

