

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

### Respondent details

**Comment ID number:** PDSP.122.001

**What is your Name:** derek10

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

Rivelin Valley Conservation Group

**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 SP1: Overall Growth Plan

**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:**

8. The following paragraph is unsound.

“The Sheffield Plan will deliver:

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 (see policies GS1 to GS11)”

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 and or the Building with Nature Standards for Local Plan policies

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

**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:**

- “(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” 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)

**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

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

### Respondent details

**Comment ID number:** PDSP.122.002

**What is your Name:** derek10

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

Rivelin Valley Conservation Group

**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 SA2: Northwest Sheffield

**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:**

Paragraph 4.56. "The Rivelin and Loxley Valleys are popular areas for outdoor recreation, connecting the city to the large areas of attractive countryside before it reaches the Peak District National Park. This land is almost entirely designated as Green Belt." should be amended to include reference to the importance of nature conservation, biodiversity, landscape character and heritage for both of these valleys.

**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:**

see above

**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

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

### Respondent details

**Comment ID number:** PDSP.122.003

**What is your Name:** derek10

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

Rivelin Valley Conservation Group

**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:**

"5.24 Sheffield's blue and green infrastructure is important at all scales and is represented on Map 17".

Unsound. As previously commented under Policy SP1 – Map 17 does not show Blue & Green Infrastructure

**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:**

For the reasons outlined in Part 1, SP1, 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 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"

Add "the conservation of heritage assets" to the list of benefits (first paragraph);

Add "and their associated waterpower infrastructure" to the list of main river corridors;

Add "registered parks and gardens" to the list of key elements of the Green Network.

On page 103, Policy BG1, Rivelin is included in the list of main river corridors, and should be added to the list of 'major parks and green spaces of city-wide importance for recreation and/or biodiversity'.

Part 1, Map 17 on p110

Add locations of registered parks and gardens.

**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

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

### Respondent details

**Comment ID number:** PDSP.122.004

**What is your Name:** derek10

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

Rivelin Valley Conservation Group

**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 2: Development Management Policies and Implementation

**Which section of the document is your representation on:**

Chapter 2: The Policy Zones, Allocated Sites and Other Designations

**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:**

Chapter 8. "A Green City - responding to the Biodiversity Emergency" doesn't describe the breadth of the policy framework in this Chapter.

**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:**

Delete from "- responding to the Biodiversity Emergency" and paragraphs 8.1, 8.2 and 8.4 and include these paragraphs before paragraph 8.18 as part of the introductory text to Policy GS 5



**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

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

### Respondent details

**Comment ID number:** PDSP.122.005

**What is your Name:** derek10

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

Rivelin Valley Conservation Group

**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 2: Development Management Policies and Implementation

**Which section of the document is your representation on:**

Chapter 8: A Green City – Responding to the Biodiversity Emergency

**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:**

Policy GS5 calls for development to protect and promote biodiversity. Policy GS6 builds on this by requiring Biodiversity Net Gain. Policies GS9, GS10 and GS11 concern flood risk, water resources and drainage. All have the potential for impact on waterways and waterpower infrastructure, but nowhere in these policies is their heritage value acknowledged, and neither is there any reference to the value of artificial waterways as habitat nor their potential to assist in flood risk mitigation. These are serious omissions, and the policies as they stand constitute a threat to Sheffield's river valleys and their complex system of man-made infrastructure, described in the Council's Sheffield Waterways Strategy as a globally important place.

These policies currently fall very significantly short of providing sufficiently for the conservation and enhancement of the natural, built and historic environment (NPPF 20(d)), recognising historic waterways as an irreplaceable resource to be conserved in a manner appropriate to their significance (NPPF 189) or a positive strategy for the conservation and enjoyment of the historic environment (NPPF 190).

**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:**

The wording of policies GS5, GS6, GS9, GS10 and GS11 must be amended to refer explicitly to and protect the heritage value of historic waterways and waterpower infrastructure, and their settings. There should be specific prohibition of measures such as the destruction of historic weirs, changes to water levels in dams and goits, or decanalisation of historic artificial channels.

**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

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

### Respondent details

**Comment ID number:** PDSP.122.006

**What is your Name:** derek10

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

Rivelin Valley Conservation Group

**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 2: Development Management Policies and Implementation

**Which section of the document is your representation on:**

Policy GS2: Development in the Green Belt

**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:**

.In paragraph 8.11 of the Local Plan, the preamble to Policy GS2, the The National Planning Policy Framework in effect sets out a significant part the Local Plan's Policy for development in the Green Belt. However, though particularly important in the planning process; the Framework is a material consideration and "must be taken into account" in determining planning applications, it is not a statutory document, unlike the Local Plan when adopted. It is therefore argued that the NPPF carries less weight than the statutory Local Plan and all relevant aspects of Green Belt Policy should therefore be included in the Plan.

In addition to the legal issue raised, it would be significantly easier for users of the Plan if all elements of policy for development in the Green Belt are included in Policy GS2.

**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:**

Amend Policy GS 2 to add National Planning Policy Framework Paragraphs 147 - 151

**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

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

### Respondent details

**Comment ID number:** PDSP.122.007

**What is your Name:** derek10

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

Rivelin Valley Conservation Group

**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 2: Development Management Policies and Implementation

**Which section of the document is your representation on:**

Policy GS3: Landscape Character

**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:**

In the supporting Document "Preliminary Landscape Assessment 2015" the Rivelin Valley is shown within the Area defined as VA3 Pastoral Upland River Valleys. Although the three categories - Upland, Valleys and Lowland in Policy GS 3 do not coincide with the descriptions in the Landscape Character Assessment it is assumed that the Rivelin Valley falls within the Policy GS3 categories. The Indicative Maps in the Assessment do not show precise boundaries and also, on the Maps for the North West (Map 7) and South West (Map 12) Sub Areas no boundaries are shown for the areas indicated in Policy GS 3. This also applies to the interactive Policy Map. It is therefore difficult to see how, in certain situations, Policy GS 3 could be used in the determination of planning applications.

The current statutory Planning Policy GS 8 in the Unitary Development Plan defines precisely Areas of High Landscape Value and this has proved very useful when the Rivelin Valley Conservation Group has submitted comments on relevant planning applications.

**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:**

In order to define the Areas to which Policy GS3 applies the precise boundaries of these Areas should be defined on the Policy Maps for the North West Sub Area (Map 7) and the South West Sub Area (Map 12) and also on the interactive Policy Map

**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

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

### Respondent details

**Comment ID number:** PDSP.122.008

**What is your Name:** derek10

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

Rivelin Valley Conservation Group

**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 2: Development Management Policies and Implementation

**Which section of the document is your representation on:**

Policy DE9: Development and Heritage Assets

**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:**

There should be provision for the proactive identification and designation of new Conservation Areas in order to comply with the Planning (Listed Buildings and Conservation Areas) Act 1990 s69(1). In particular, the Castlegate area, already identified by the Council as of special architectural or historic interest and appraised for designation, should be designated, and its proposed designation reflected in the plan. Policy DE9 calls for the conservation and sustainable use of heritage assets, including those which are locally



listed or non-designated. The policy makes no provision for around forty Areas of Special Character (ASC) which since 1998 have been identified and protected in the Unitary Development Plan for their special architectural or historic interest. These areas are non-designated heritage assets and merit assessment for designation as Conservation Areas, although this has not been done for the great majority of ASCs. Removing their protection is a retrograde step in the protection of the city's historic environment. Although local listing is referred to there is no provision for the creation, maintenance or expansion of the Local Heritage List and no description of its importance. Modifications are needed in these respects to make sufficient provision for the conservation and enhancement of the natural, built and historic environment (NPPF 20(d)) and ensure that developments are sympathetic to all aspects of local character and history (NPPF 130(c)).

**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:**

Policy DE9 or other relevant policies should be amended so as to maintain protection for Areas of Special Character; provide for the creation, maintenance and expansion of the Local Heritage List; and proactively identify and designate new Conservation Areas, including Castlegate.

**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

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

### Respondent details

**Comment ID number:** PDSP.122.009

**What is your Name:** derek10

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

Rivelin Valley Conservation Group

**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:**

Policies Map

**Which section of the document is your representation on:**

N/A

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

Safeguarded for Flood Storage

### 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:**

On the Policies Map, an area in the Rivelin Valley is shown as "Land that is Safeguarded for Flood Storage". This designation would require the building of a significant embankment across the valley, and associated infrastructure, that would have a major adverse impact on the biodiversity, public recreation, heritage and landscape. The option of an embankment in this location raised significant local opposition when it was first put forward in 2016.

**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:**

The area of "Land that is Safeguarded for Flood Storage" in the Rivelin Valley should be removed from the Plan. This designation would require the building of a significant embankment across the valley, and associated infrastructure, that would have a major adverse impact on the biodiversity, public recreation, heritage and landscape. The option of an embankment in this location raised significant local opposition when it was first put forward in 2016.

**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

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

### Respondent details

**Comment ID number:** PDSP.122.010

**What is your Name:** derek10

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

Rivelin Valley Conservation Group

**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:**

Glossary

**Which section of the document is your representation on:**

N/A

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

Open Space

### 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 Glossary defines "Open Space" and Urban Greenspace" and also refers to Policies in the Plan which contain reference to a variety of types of "open space". Examples are - informal greenspace, amenity greenspace, accessible natural greenspace, open space in residential areas, local greenspace. Bearing in mind a key purpose of the Plan is to provide the statutory basis for development control decisions, it is contended that first, there would be difficulty in understanding the precise definition of each of these descriptions of "open space" and secondly applying them to specific planning applications.

**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:**

Each of the different types of "Open Space" in Parts 1 and 2 of the Local Plan should be brought together in the Glossary together with clear definitions of the open space type. Then, in Parts 1 and 2 of the Plan reference should be made, as appropriate, to the specific open space type and definition in the Glossary.

**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