Sheffield Local Plan Issues and Options consultation Sep 2020

SRWT Draft response

- Does the vision match your ambitions for the city?
● What do you think of the specific choices we have to make about business development, infrastructure and housing?
● Are there any other things that the new plan should cover?

Vision: In 2038 Sheffield will be a fair, inclusive and environmentally sustainable city. It will be playing a nationally significant economic role at the heart its region, with thriving neighbourhoods and communities, and have a distinct urban and rural identity.

Consultation questions
Q1a: Do you agree with the draft vision?

Largely, but we suggest incorporating the additional words in bold.

Vision: In 2038 Sheffield will be a fair, inclusive, **nature rich and** environmentally sustainable city **enabling a good quality of life for all its inhabitants**. It will be playing a nationally significant economic role at the heart its region, with thriving neighbourhoods and communities, and have a distinct urban and rural identity.

Q1b: Please explain your answer
Q2a: Do you agree with the 8 aims?

Broadly yes however:

Aims 1&2 are clearly given higher prominence than the other aims as demonstrated in the diagram on p15. We don't disagree with this approach but we would:

Request that Aim 2 is broadened to recognise the climate AND nature crisis so that there is both a focus on carbon reduction, climate change mitigation/adaptation AND natures' recovery - as we rely on so many ecosystem services that biodiversity and nature provide. This has links with Aim 7 but is different in its purpose as it is not about recreation and the outdoor city specifically. Through the Green City Partnership, we have proposed that the Council declare an ecological emergency and rapidly agree a plan with partners to tackle both.

Suggest that there is a distinction made between Aims 1&2 and then the Sub Aim that follow

We have individual comments to make about the 8 aims which will do so in that section (see table)

Q2b: Please explain your answer

'Environmentally sustainable' is broader than just a zero carbon city but should also include how protecting, enhancing (improving the condition of) and expanding the natural environment is both part of sustainable development and essential for mitigation and climate change mitigation and adaptation. This model would better represent 'Donut economics' which considers how social foundations are met through economic activity without overshooting ecological ceilings. Development and policies can then be considered on how they both reduce carbon emissions *and* deliver nature's recovery (as well as protecting what is there). Both will reduce the risks of climate change.

The whole vision, aims and plan content should be checked against the 17 UN Sustainable Development goals https://sdgs.un.org/goals .

As it stands the ambition of Aim 7 is lacking. Your video highlighted how Sheffield prides itself as a 'green city' - this should be taken further in the lifetime of the plan and beyond.

Either here or under a revised Aim 2 (see earlier), there should be more ambition to protect and expand Local Wildlife Sites (which weren't mentioned at all in the video), with a clear target by 2038 for more land to be set aside for nature's recovery. The Wildlife Trusts are calling for 30% land to be set aside for nature by 2030.   Aim 2/7 can therefore be more visionary and ambitious – for example 'A green city that continues to cherish, protect and enhance its green spaces and heritage assets' we would like to see a greater ambition along the lines of 'The green city that is passionate about its green spaces and heritage assets and will cherish, protect and enhance what we have, whilst being at the forefront of urban nature recovery.'

The Council could even consider building on Sheffield's strengths to consider moving towards being a National Park City https://www.nationalparkcity.org/ like London which was declared the world's first National Park City in 2019 https://www.nationalparkcity.london/ ('Lets make London Greener, Healthier and Wilder').

SEE TABLE ON SEPARATE DOCUMENT FOR RELEVANT EXTRACTS OF THE AIMS, QUESTIONS AND OUR RESPONSES

3. Spatial options

Q22a: Which of the 3 spatial options (A, B, C) do you prefer?

We are not going to specifically choose A, B or C. Whatever is decided, as part of the Local Plan, as well as considering housing and employment land, there needs to be consideration of existing and future land set aside for nature and the forthcoming statutory requirement for Nature Recovery Networks (NRNs). Whatever is decided (which could even be changed to 'zones' with the Planning White Paper) – space needs to be allocated for NRNs from the Green Belt, through the suburbs and into the city centre, bringing nature to people's doorsteps.

We also agree that space for water is also needed throughout the river network of Sheffield and floodplains/areas at high risk of flood should not be allocated for development.

We also want to see important, ecologically rich local natural green spaces (which may well be part of the Green Belt) retained and enhanced where possible. As it stands, green belt sites have not been assessed for their ecological value and potential place in a NRN– we would like to see that addressed if any were to be considered for removal from the belt and/or potential future development. We would also want to see a new up to date Landscape Character Assessment inform these type of decisions.

The requirement for NRNs needs to be factored into decisions about allocations as potential and important nature corridor may be lost due to allocation. Potential allocation sites also need to be assessed for their ecological value. The results may mean that some sites are excluded from

allocation as their ecological value is too high, but other sites are included with 'ecological notes' attached to the allocation information (along with other pertinent information for a prospective developer). As part of their Local Plan development, Rotherham and Barnsley MBCs both commissioned ecological sites prior to their potential allocation and we would strongly recommend that SCC do the same - starting as soon as possible. This information would be equally valuable if the system does change to one of 'zoning'.

One of the options that seems to be missing in detail – although it is briefly mentioned – is the brave re-masterplanning of some of the fairly central areas of Attercliffe, Neepsend and Shalesmoor that were being considered in the 2015 Sites and Policies consultation. Re-modelling and regenerating at least parts of these areas, with in-house and external expertise, could really offer an opportunity for Sheffield to be bold and ambitious with its vision for a 'fair, inclusive and environmentally sustainable city', whilst delivering housing numbers. There is an opportunity here to create high quality zero-carbon, nature-rich places for people to live and work on previously developed land in fairly central locations, building on the existing transport and infrastructure. These areas offer opportunities to improve the green and blue infrastructure (for example along the waterways), which may be part of NRNs, bringing nature to people's doorsteps (with its health benefits), whilst building in active travel and truly sustainable, zero-carbon development. At the moment, the locations for potential development appear to be for individual sites, rather than looking strategically for potential larger areas of potential high-quality regeneration.

It is also not clear how Neighbourhood Plans would play a role in the new Sheffield Plan. Many people have dedicated their time as local, informed volunteers to develop high quality neighbourhood plans – they have a good understanding of their local areas and how development and other considerations could be accommodated within their area. What will the policies be around Neighbourhood Plans?

Pleased to see designated ecological sites included in the Sustainability Assessment as an indicator and we also support flood risk as being an indicator.

Q22b: Please explain your answer
Q23a: Are there any other options that we haven't considered?

We are sure you are considering both of these but:

Reviewing housing target numbers for Sheffield in light of potential changes in the way Government is calculating such targets (consultation on Changes to the Current Planning System).

Reviewing the number of city centre office buildings that may become vacant due to less office working long-term as a result of the Coronavirus pandemic.

Q23b: If so, why do you think the other option(s) should be considered?

As these reduce the pressure to use greenfield sites.

Q24: Which of the sites identified in the Housing and Economic Land Availability Assessment are suitable and available for development (please give reference numbers of the sites you refer to)?

We are pleased to see that you have excluded sites that are Local Wildlife Sites (Local Nature Sites) as being suitable for consideration for housing or economic development. We would like SCC to assess these sites against emerging Nature Recovery Network and Natural Capital maps, as some may have a valuable place in a network, or score highly for natural capital value. We would be very happy to discuss this with you further.

We are disappointed to see site S03219 (Grange Mill Lane) on the HELAA map as being an 'other identified site' as this site is categorised as 3b floodplain, which goes against your criteria of 'whether the site would be at risk of flooding' and the policies are you proposing around high flood risk sites. We therefore recommend this is removed as a potential development site and recategorized as floodplain and/or open space.

We would like S00738 (Owlthorpe Plot D) S00736 (Owlthorpe Plot C) and S00737 (Owlthorpe Plot E) removed as potential housing development sites. This is because the nature of the sites has changed substantially from when they were first allocated in the 1970's. The sites have now extensively re-vegetated (from arable land) and are highly valued by the local community as green spaces with ecological value (although not currently designated).

S02413, Land at Hurlfield Rd (Gleadless) is adjacent to Bucks Wood and it a greenfield site. We do not know the ecological value of this site, but it should be surveyed to assess its value and therefore whether it would be better to be retained, or if there are ecological mitigation and compensation consideration for any potential future allocation.

Norton Aerodrome should be reassessed in detail, including an ecological survey, to see if all or any part of it could be considered from release from the greenbelt and potentially suitable for development. We do not have sufficient information to offer an opinion on whether this may be the case.

Q25a: Do you agree with the criteria for selecting sites set out in the box on page 52?

Yes, but we would add two.

Q25b: Are there any other criteria which we should take into account?

The location of the site in a Nature Recovery Network, plus its potential to biodiversity enhancement through Biodiversity Net Gain, an Environmental Stewardship scheme or similar. The development of a Nature Recovery Network (NRN) map and accompanying Local Nature Strategy map will be a statutory requirement in the Environment Act and should be part of the evidence base for this Local Plan. The NRN should be shown as a layer in allocations maps and be separate from a Green Infrastructure layer (although they may overlap in places).

Its natural capital value (measured by its provision of ecosystem services). As the loss of a site to development with a high natural capital value may lead to disproportionate loss of ecosystem services being delivered to the population of Sheffield and intended impacts on the ability to deliver other policies, including within the Local Plan. Ecosystem services include reduction of air pollution, heat island mitigation, storm water run-off reduction, carbon storage, recreation opportunities and habitat for biodiversity. Up to date and detailed Natural Capital maps at the

South Yorkshire or Sheffield scale should be part of the evidence base for decision making at the strategic and site-scale.

Q26: If it is necessary to remove some land from the Green Belt to meet future development needs, which would be the best general locations?

We agree with the list of suggested 'site based constraints' (p32 of the Green Belt Review) and 'excluded areas' which includes high risk flood zones, ancient/mature woodland and identifies the importance of Local Wildlife Sites alongside LNRs and SSSIs, plus leaving high risk flood zones.

Although ecologically designated sites are excluded, we would also not want any site removed from the Green Belt that had a high biodiversity value in terms of habitat and/or species (but is not designated) and/or is a component of an ecological network/nature recovery network.

We have a specific view that the former Stradbrook college site should **not** be removed from the greenbelt (see 7.15 in the Green Belt review). This now forms part of the Carbrook Ravine Nature that we manage (on a leased basis) and this specific site has been restored to a meadow by the Sheffield and Rotherham Wildlife Trust which is contributing to reversing the loss of over 90% of Sheffield's species-rich grasslands. We would not want any green belt planning policy status to be removed from this site as it may threaten its protection in the long-term.

We do support the proposal to add both Holbrook Heath and Land to the west of Mosborough/ south of Quarry Hill into the Green Belt (7.21 in the Green Belt review).

We also think SCC should assess and consider adding in Hollins Busk to the Green Belt. This site is currently offered some protection under 'Protected Open Countryside' policies.

We do not support the removal of the whole of SE1 without an analysis of whether it forms an important component of an ecological network/nature recovery network.

Norton Aerodrome should be reassessed in detail, including an ecological survey, to see if all or any part of it could be considered from release from the greenbelt and potentially suitable for development.

4. Implementing the plan

Delivery of infrastructure needs to be coordinated so that the right things are delivered at the right time, and in the most efficient way. We are developing an **Infrastructure Delivery Plan (IDP)** that will help to achieve this.

How do we plan and fund infrastructure?

Infrastructure Delivery Plans (IDP) – an IDP identifies the city's infrastructure requirements including social, physical and **green infrastructure**. The IDP sets out what is needed, where it is needed and when it is needed and looks at how it might be funded.

Community Infrastructure Levy (CIL) - CIL is a levy that local authorities can charge (and we do) on new developments in their area. The money is used to support development by funding infrastructure

that the council, local community and neighbourhoods want.

Planning Obligations – also known as Section 106 agreements – are legal agreements between an applicant seeking planning permission and the local planning authority. The agreement is used to mitigate the impact of a development and can include funding local infrastructure such as school places or improving parks.

It is essential that an increasing population is supported by sufficient quality infrastructure. All three of the Options outlined in Section 3 would create a need for significant new infrastructure, such as health, education and transport facilities.

Under Options B and C, the development of fewer, larger sites is more likely to support new local facilities and services than numerous smaller scattered sites. The precise requirements would depend on the location of any urban extensions. Money generated by Council owned
Green Belt sites could be used to deliver priorities such as affordable housing or subsidise brownfield development *this is not what they said in the table where they said it could be spent on GI in the suburbs/Green Belt – which would it be?*

What is the information that we want from infrastructure providers?

What have we got and what will we need?

When do we need to deliver more capacity?

Where do we most need new or improved infrastructure? **Where** will new development put pressure on what we have?

How will new infrastructure be delivered? **How** much will it cost?

Who will deliver it?

Consultation questions

Q27: What should be the city's infrastructure priorities?

Please can the Council provide information on how much CIL and s106 has been spent on Green Infrastructure, compared with other types of infrastructure over the last Plan period. Please can the Council commit to developing, consulting and agreeing on a Green & Community Infrastructure Plan for this Local Plan to set out how s106 and CIL funds will be spent going forward.

It is also worth noting that any funds generated from off-site Biodiversity Net Gain, needs to be ring-fenced for nature's recovery in line with forthcoming Local Nature Strategies and not spent on other community infrastructure.

There are Transport and Social Infrastructure Technical Notes, but we question why there is not an equivalent Green Infrastructure Technical note. Does the Council place less importance on GI?

Q28: The Issues and Options document does not provide draft policies but are there any matters that you would like us to address in local policies? A **Draft List of Policy Themes and an Outline of the Issues** to be covered is available on our website alongside this document (scroll down for these)

27. Missing is:

a) a spatial GI plan

b) the need for GI to maximise Ecosystem Service/Natural Capital provision.

33. Recommend linking the requirement of buffers to the designated sites and habitat creation being separate – in relation to BNG and NRNs

Missing is:

a) The mitigation hierarchy

b) Policies on species, including protected species

c) A separate broader policy on Nature's recovery including spatial Nature Recovery Networks containing habitat protection, enhancement and creation to fulfil the requirements of the NPPF, Env Bill and 25 year Env Plan. Linked to BNG and Local Nature Recovery Strategy. We would prefer this to be a whole new line (34, moving the others down), as a significant policy is required to meet NPPF policy requirements 170d, 171, 174a&b and the requirements in the forthcoming Environment Act, although if necessary, it could be within 33.

NB a Nature Recovery Network Map is different, but complementary to a Natural Capital Map and a Green Infrastructure Map.

34. We recommend expanding this sentence to say 'requirements for tree-planting, **including street trees and/or natural regeneration**

36. We suggest adding catchment-wide natural flood management to the proposed scope of this policy.

Q29: Are there any policies in the current Sheffield Core Strategy or Unitary Development Plan that you think should not change?

CS63-66 Need to be updated and strengthened in light of the climate and ecological emergencies and continued air quality issues in Sheffield.

Parts of CS67 are worth retaining - for example requiring the use of SUDS and bring in other up to date recommendations (such as natural flood management) from national and local flood prevention strategies.

CS73 The Strategic Green Network should be replaced with an updated Nature Recovery Network (spatial map) and policy and a **separate** updated GI network (spatial map) and policy.

Sheffield Core Strategy 11.8 says *"Green roofs can be used as a sustainable drainage technique, to minimise surface water run-off and therefore help to reduce the risk of flooding."* But the guideline below goes further and would be better as a policy.

Guideline CC1 in the Climate Change and Design SPD and Practice Guide.
"Requires green roofs - provided they are compatible with other design and conservation considerations, and where viable, green roofs will be required on all larger developments, and encouraged on all other developments. The green roof should cover at least 80% of the total roof area."
Retain with a link to the Sheffield Green Roof Biodiversity Action Plan
https://www.wildsheffield.com/wildlife/a-living-landscape/sheffield-local-biodiversity-action-plan/

Sheffield Plan: Draft List of Policy Themes and Outline of Issues to be covered

A Green City

27.-29 Green Infrastructure

33. Safeguarding and enhancing biodiversity and geodiversity

Green Infrastructure	Proposed scope of policy	NPPF themes
27. Green infrastructure – overall priorities ▲	• Principles for the protection, management and enhancement of green infrastructure • Requirements for mitigation where unavoidable harm is caused to green infrastructure • Management of green infrastructure across administrative boundaries	• Conserving and enhancing the natural environment • Promoting healthy and safe communities • Meeting the challenge of climate change, flooding and coastal change
28. Development affecting open space and urban greenspace	• Criteria for assessing developments that affect open space and other urban greenspace	• Conserving and enhancing the natural environment • Promoting healthy and safe communities • Meeting the challenge of climate change, flooding and coastal change
29. Creating open space in residential developments	• Requirements for the provision of on-site open space in new residential developments • Developer contributions towards the provision or enhancement of off-site open space • Requirements for the design and location of open space in residential developments	• Conserving and enhancing the natural environment • Promoting healthy and safe communities
33. Safeguarding and enhancing biodiversity and geodiversity ▲	• Definition of the hierarchy of designated sites • Criteria for assessing development that may impact on biodiversity or geodiversity • Requirements for biodiversity net gain • Requirements for habitat creation and buffer areas • Requirements on development that would cause the loss or deterioration of irreplaceable habitats • Protection against threats to UK biodiversity from disease, pests and invasive non-native species	• Conserving and enhancing the natural environment

	• Development affecting peatlands	
34. Protection and enhancement of trees, woodland and hedgerows	• Criteria for assessing development proposals that would affect trees, woodland or hedgerows (including mature or ancient woodland, veteran trees or ancient or species-rich hedgerows) • Requirements for tree-planting	• Conserving and enhancing the natural environment • Meeting the challenge of climate change, flooding and coastal change
36. Flood risk and water management	• Avoidance of development in high flood risk areas and application of the sequential test • Requirements for Flood Risk Assessments • Restrictions on development in areas of functional floodplain and developed functional floodplain • Criteria for allowing vulnerable uses in areas with a medium or high probability of flooding • Restrictions on surface water discharge • Requirements for development near to rivers and streams • Avoidance of culverting • Requirements for sustainable drainage systems • Controls over water abstraction	Meeting the challenge of climate change, flooding and coastal change