



SCC Draft Local Plan consultation

SRWT response TOP ASKS (subject to change before submission by 20th Feb)

Questions for each section – the same numbers below are used for our answers

"3. Which Document do you wish to make a representation on?" *choose from the drop-down list*

"4. Which section of the document is your representation on?" *choose from the drop-down list*

"5. Which site allocation is your representation on?" *if relevant*

"Do you consider the Local Plan is legally compliant?" *Tick 'Yes'.*

"Do you consider the Local Plan is sound?" *Click 'Yes' if you are about to put a positive comment or 'No' if you are going to suggest areas for improvement. You can even select both.*

"Do you consider the Local Plan complies with the duty to co-operate?" *Click 'Yes'*

"8. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails with the duty to co-operate. Please be as precise as possible. If you wish to support the soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments."

This is the tricky one for non-planners and refers to the soundness test (see presentation) you can use our examples if helpful

9. 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. (please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Please note: in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues that he or she identifies for examination).

Suggested modifications are helpful

3. Part 1 Vision, Spatial Strategy, Sub-Area Policies and Site Allocations

4. 2 Vision, Aims and Objectives

Objectives for a Green City

3. Part 1 Vision, Spatial Strategy, Sub-Area Policies and Site Allocations

SP1 Overall Growth Plan

8. The following paragraph is unsound.

"The Sheffield Plan will deliver:



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 (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

9. Suggested minor modifications

- “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)

3. Part 1 Vision, Spatial Strategy, Sub-Area Policies and Site Allocations

4. 5. Topic Policies

Blue and Green Infrastructure

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

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

Policy BG1 Blue and Green Infrastructure

For the reasons outlined in Part 1, SPD1, 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](#)

3. Part 2. Development Management Policies and Implementation

4. 8. A Green City – responding to the Biodiversity Emergency

GS1 Development in Urban Green Space Zones

Table 4. Standards for Assessing the Quantity of and Access to Information Greenspace and Outdoor Sports Areas

Refers lists 'Access Standards' but it is very unclear for the reader where this list has come from. Only by delving into the Supporting Evidence 'Sheffield Open Space Assessment 2022' where it is clear that is the consultant report has identified that Sheffield does not meet the Natural England Accessible Greenspace Standards (ANGST) e.g. see Section 7.3.2 and Figures 12-14 in the Assessment. Instead of taking steps to address these gaps in provision in the allocation map or policies, a lower standard of 15minute walk time to an accessible natural greenspace has been suggested in the Assessment. There is no explanation of this in Part2 and no strategic policies to address the gaps identified by both ANGST and this locally suggested lower standards (Figure 11).



4. 8. A Green City – responding to the Biodiversity Emergency

Policy GS5 Development and Biodiversity

8. Unsound

Although examples (including 'swift bricks') are given in the 'Definitions' box beneath, there is no clear expectation of the extent to which these will be required. For example several UK Red list bird species – swifts, house sparrow, startling and house martins can benefit from the inclusion of cheap swift bricks in all new builds. Integrated bat tiles or bricks are also very affordable and should be standard.

Justification NPPF para179 "Plans should" b) "...and the protection and recovery of priority species"
www.gov.uk/guidance/natural-environment#green-infrastructure Paragraph 023 Reference ID: 8-023-20190721

www.gov.uk/guidance/natural-environment#biodiversity-geodiversity-and-ecosystems

Paragraph: 012 Reference ID: 8-012-20190721

9. Suggested minor amendments/clarifications

a) And j) *Addition* 'and South Yorkshire Local Nature Recovery Strategy/Sheffield Nature Emergency Action Plan'

e) "Prevent the loss of" *Suggest changing to:*

must include enhancements for the protection and recovery of priority species.

- development of all new dwellings must include swift bricks or other bird roosting opportunities and bat bricks/tiles and passage for hedgehogs.
- riparian development should include enhancement for riparian species (including bats, otter, kingfisher) depending on how close the development is (due to buffers)

Suggest amendment to l) (and or the definition of Design features to enhance biodiversity): Design features to enhance biodiversity and create opportunities for species could include **green and brown roofs, street trees, native shrubs, hedgerows and wildflowers, bird boxes or platforms, swift bricks, bat boxes, bat bricks or tiles, hedgehog holes...**

Annex A Site Allocation Top Comments

Policy CA4 – Central NWS02 – remove small portion of Parkwood Springs Local Wildlife Site from allocated site as incompatible with LWS policies.

Policy SA2 Northwest NWS29 – remove Parkwood Springs LWS from red line boundary as incompatible with LWS policies

Policy SE5 South East

SES02 – remove LWS285 from allocated site boundary to ensure protection in line with LWS policies. Add in condition for a LWS buffer

SES04 – remove LWS281 from allocated site boundary to ensure protection in line with LWS policies. Support buffer wording and reference to ecological corridors/areas in conditions.

SES05 – remove LWS281 from allocated site boundary to ensure protection in line with LWS policies. Support buffer wording and reference to ecological corridors/areas in conditions.