

# COMMENTS ON THE EMERGING SHEFFIELD DRAFT LOCAL PLAN REPRESENTATION FROM THE DORE VILLAGE SOCIETY

Dore Village Society strongly supports Sheffield City Council's Emerging Local Plan. We believe this is a comprehensive, well evidenced and well written plan for the future development of Sheffield. It is ambitious and, especially in areas related to mitigating global heating and improving transport, will require transformational change that will be very challenging.

In particular we are pleased to see the importance attached to the protection of Sheffield's Green Belt, measures to combat climate change and transport improvements.

Having carefully considered the Plan we set out our comments below. In a few cases we have suggested alternative wording, these are highlighted in red. Direct quotes from the Plan are in *Italics*

## Housing Numbers

We are concerned to have found in different sections of the Plan what appear to be significant discrepancies in the number of new homes to be delivered:

- The Forward and Policy SP1 quote a figure of 35,530 new homes.
- Table 1 on Page 96 shows a total of 35,558 (the footnote to Tables 1 and 2 state that figures are rounded to the nearest 5, but this is not so in all cases).
- There is a discrepancy between the List of Allocated sites in Appendix 1 and the similar list in Annex A. Appendix 1 quotes site SWS02 as having a capacity of 132 homes and Annex A capacity of 369. It would appear that the figure of 775 new homes in Policy SA7 is based on the figure of 132. Should the fault lay in Appendix 1 then figures in the Forward, Policy SA7 and Tables 1 and 2 will need to be corrected. If in Annex A, then this needs correction. We have only closely scrutinised figures for the South West area

Some minor improvements to provide clarity to Tables 1 and 2 are suggested in the section below headed: **Vision, Spatial Strategy, Sub-Area Policies and Site Allocation, South West Sub-Area**

We appreciate that this is a large and complex Plan, but feel it is essential that numbers add up and are consistent throughout the Plan; we suggest that tables in both Appendix 1 and Annex A should show totals; this would help to ensure consistency.

## A - Part 1 of the Plan: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations

### 1. Forward - a New Vision for Sheffield

The forward includes the statement: "*...supporting the Council's clear objective to be net zero carbon by 2030*". In the Aims and Objective section, a stated objective of the Plan is "*To make Sheffield net zero carbon by 2030*".

This gives the impression that implementing the policies in the Plan will achieve the above objective; this is manifestly not so; the policies in the Plan fall well short of this. Whilst, for example, the Plan sets out policies such as standards for new builds, which will certainly help a move towards net zero, it makes no mention of policies to move the 247,000 existing homes in Sheffield to zero carbon energy use. This is reflected in the monitoring metrics under the heading **An Environmentally Sustainable City:**

- Percentage of new homes generating onsite renewable - annual (Policy ES2)
- Number and capacity of new renewable energy networks or shared energy schemes completed - annual (Policy ES2)

The Council is clearly looking at this and has commissioned report by Arup into the steps that are needed for Sheffield to be a net zero area by 2030. The report stresses that this is an extremely ambitious and stretching target that needs immediate action. The Plan cross references the Arup Report:

<https://www.arup.com/perspectives/publications/research/section/pathways-to-zero-carbon-in-sheffield>

We feel that the Plan needs to be up front about this. It needs to stress that whilst the policies in the Plan will support the objective, they are only part of a much wider and more detailed plan that will consider actions, priorities, and, importantly funding that will be needed.

The figure of 35,530 new homes is inconsistent with the figure of 35,558, see tables 1 and 2 on Page 96 of the Plan.

## 2. Vision, Aims and Objectives

### Figure 1: Sheffield Plan- Aims and Objectives

We feel it would add clarity to this section if the Figure 1 heading was amended to read “**Sheffield Plan, Vision and Aims**”, since there are no objectives in the diagram. There should then be a separate heading; “**Objectives**” for the bullet list that describes the objectives that will deliver the aims.

## 3. Growth Plan and Spatial Strategy

### The Sheffield Hierarchy of Centres and Sub-Area Strategy

#### Planning for Growth

##### Para 3.4

*“Sheffield’s development needs to 2039 will be met within the existing urban areas, largely without the need to remove land from the Green Belt. The proposed number of new homes will support the target for creating new jobs that is set out in the Sheffield Yorkshire Mayoral Combined Authority Strategic Economic Plan (2021 - 2041) (SYMCA SEP)”*

We feel that the word “largely” leaves scope for interpretation and would suggest wording that should delete “largely” and add after “Green Belt” “**other than a significant development on the site of the old Norton Aerodrome and a few small areas specified in Policy GS2.**”

#### Map 3 Settlement Hierarchy and Hierarchy of Centres

This is a helpful map, however the icons in the Legend are not consistent with those of other maps in the Plan, for example, in comparing Map 3 with Map12 (which is a sub-set of Map 3 for the Southwest Sub-Area) the icons for District Centres and Local Centres differ, as does the colour of the urban areas.

We feel that all maps in the Plan should be reviewed to ensure a consistency of icons and colours used. If possible, the Legends for the Sub-Area maps should be rationalised to show only the icons on the relevant map - we found the Legend on the South West Policy Map particularly confusing and the shading of Ecclesall Woods obscure, as two similarly coloured hatchings depicting a Local Nature Reserve and a Local Wildlife Site were overlaid and looked like a single feature, which was (obviously) not in the Legend.

### Vision, Spatial Strategy, Sub-Area Policies and Site Allocation

#### South West Sub-Area

The footnote to Tables 1 and 2 states: “*All figures have been rounded to the nearest 5 dwellings*”. This is not so in all cases.

At first sight the numbers between Table 1 and table 2 do not appear to balance. This could be corrected if the figure of 26,853 Allocated Sites (rounded to 26,850) were split by allocated sites with and without planning permission. This would then balance with the figures in Table 2.

The figure of 35,530 in the Forward should be amended to agree with the figure in Table 1.

## Policy SA7

Policy SA7 makes little mention of Dore when compared to policies for similar Sub-Areas, for example, policies for the South Sheffield Sub-Area include in Policy SA6: “ **Protect existing Green Belt boundaries (see Policy GS2)**, with the exception of the proposed strategic release of the brownfield site allocation SS17 - former Norton Aerodrome”.

Although this is covered in Part 2 of the Plan, which defines 13 Policy Zones, including the Green Belt, we believe that a similar statement should be included in Policy SA7 along the lines of: “**Protect existing Green Belt boundaries with the exception of infilling in three small gaps in housing fronting onto the road at Long Line**”.

Dore is a significant area and we feel that it merits a sentence in SA7 along the lines of: “Dore has a significant Residential Zone. It includes a Local Centre, the bulk of which is in a conservation area, several open spaces and, in Ecclesall Woods (the largest ancient woodland in South Yorkshire), a Local Nature Reserve and Wildlife site”.

There appears to be a conflict in terminology. Developed areas in the Plan are sometimes referred to as “Urban Areas” and in others as “Residential Zones” (for example the Map 3 references “Main Urban Areas”, Map 12 “Urban Area” and the Sheffield South-Western Area Policies Map “Residential Zone”, all for the same area of Dore. We note that in the list of Zones in Part 2 of the Plan no category of Urban Zones is listed.

We suggest that the Plan be reviewed to give a single, consistent name to these areas, which we suggest should be “**Residential Zones**”.

Policy SA7 contains the following statement: “*Development proposals in the Southwest Sheffield Sub-Area will:*

*a) Deliver approximately 755 new homes and 0.02 hectares of employment land (through a combination of planning permissions and new site allocations).*

*b) Deliver a housing requirement figure for the two Neighbourhood Plan*

*areas:*

- *Dore - at least 40 homes (including homes which already have planning permission and windfall sites); and*
- *Broomhill, Broomfield, Endcliffe, Summerfield and Tapton (BBEST) - at least 224 homes (and will be limited to conversion or redevelopment of existing buildings and sites)”.*

It is unclear whether these additional homes are included (or indeed if all should be included if some are not new homes but replacement of existing homes) or excluded from the 755 homes mentioned above and we suggest this should be clarified (e.g. by a footnote).

## Long Line Substantially Developed Road Frontage

The developed areas of Long Line are shown on the South-West Policies Map, which shows three distinct areas, with significant gaps between them; this accords with the Dore Neighbourhood Plan, which suggests that infilling would be permitted only within these three areas, specified as between properties numbered 1 – 19, 57 – 63 and 139 – 175 Long Line. The Dore Neighbourhood Plan then says development should maintain the open character of the Green Belt; “**respecting its surroundings, including the setting of the Peak District National Park and maintaining the building line set by neighbouring dwellings**” .

## Policy IN1 Infrastructure Provision

Policy IN1 includes a statement on digital infrastructure:

*“Digital infrastructure and connectivity - including both broadband and cellular networks. Provision will respond to the objectives set out in the South Yorkshire Digital Infrastructure Strategy (2021) to accelerate the development of ‘gigabit capable’ digital infrastructure and 5G networks to support social and economic opportunities as part of a more proactive approach to facilitating inclusive growth”.*

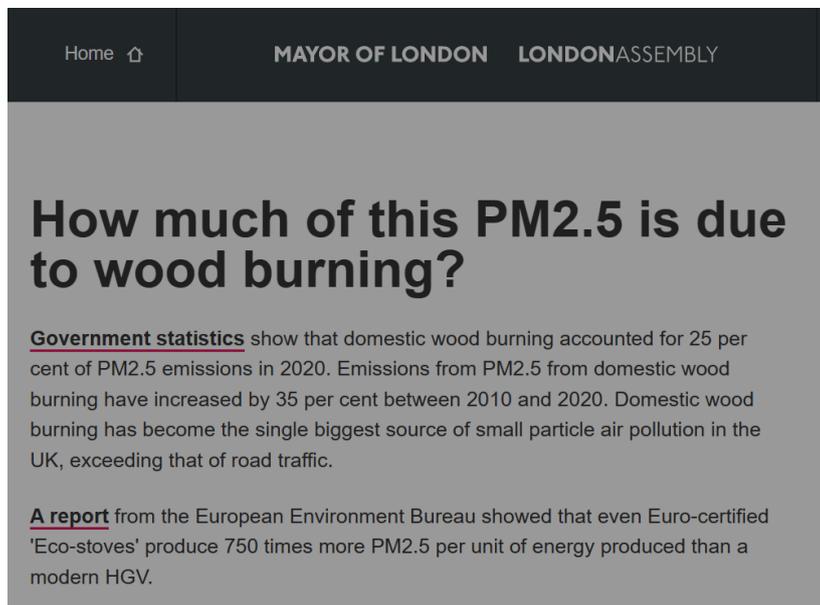
We would suggest that this statement includes the following. “**All new build developments will be required to have physical infrastructure to support gigabit-capable full fibre connections. Policy CO3 in Part 2 of the Plan Provides further details of this requirement.**”

## B. Part 2 of the Plan Development Management Policies and Implementation

### Policy ES5: Managing Air Quality

Emissions from wood burning stoves are a major source of fine particle (PM2.5) pollution. Research by the Greater London Authority summarised in Figure 1 below shows the extent of this:

Figure 1



Source: [Guidance for wood burning in London | London City Hall](#)

Since the publication of the above the GLC is reported as proposing to ban wood burning stoves from new and re-furbishes properties. We feel that the City Council should strongly consider following the GLC's lead.

### Policy GS1 Development in Urban Green Space Zones

Given the problem with some areas being described as "Urban Zones" and also "Residential Areas" in different maps we suggest that the Policy should just refer to **"GREEN SPACES"**

### Policy GS2 Development in the Green Belt

There appears to be an inconsistency in the overlap between the Sub Areas and the Policy Zones. For example, the South Policy Sub-Area (Policy SA 6) includes Protection of the Green Belt and the development of the Norton Aerodrome, whereas developments in the South West Area are included in the Green Belt Zone Policy GS2 and Norton Aerodrome does not feature in Policy GS2. We believe that these features should be represented in both Sub Area policies and the over-arching Policy GS2.

We feel that Policy GS2 should be more positive in item (d) along the lines of: **"Apart from a significant development proposed on the site of the old Norton Aerodrome, and some minor infilling** (quote locations, see note of these in Dore under the heading **Long Line Substantially Developed Road Frontage**)

Should Policy GS2 (d) say: "Small **gaps**" rather than "a small gap" in the sentence: ".....proposals for infilling of a small gap are proposed..." "... **Whitley and**" rather than "Whitley or" and rather repeat "proposals" twice in one sentence this to read: "... **proposals for infilling small gaps are made...**"

## **Policy GS 3 Landscape Character**

The Plan does not define “Landscape Areas”. We suggest that this policy should be worded: “... The following relevant **NATIONAL LANDSCAPE CHARACTER AREAS...**”

## **Policy DC1 – The Community Infrastructure Levy and Other Developer Contributions**

It is Council policy, quoted on the Council’s web site, that a proportion of CIL should be passed to areas where there is a Local Council. Where there is no Local Council, but a Local Neighbourhood Forum has developed an adopted Neighbourhood Plan, Sheffield City Council policy is to pass any relevant CIL payments directly to that Forum. We believe that this provision should be incorporated in the above policy.

**Version: Final V1.1**

**Dore Village Society**  
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