

SHEFFIELD LOCAL PLAN DRAFT SCA REPRESENTATIONS DRAFT 4 (FINAL)

OPENING QUESTIONS

Representations have been made to Sheffield City Council as a series of comments. Each comment required a separate form to be completed. We used a set of standard answers for questions 1, 2, 5, 6 and 7:

- **Answer to Question 1:** South Yorkshire Climate Alliance
- **Answer to Question 2:** Nil response
- **Answer to question 5:** Yes
- **Answer to question 6:** No (for objections to the plan, when we have supported the plan, we have answered this question with 'Yes')
- **Answer to question 7:** Yes

Answer to Question 3 and 4 – specific to section of plan comment refers to.

Answer to question 8: Why the Local Plan is unsound (used when we have answered Q6 with No):

We believe that the plan is unsound because the level of ambition is incompatible with the Council's own policy of achieving net zero carbon emissions by 2030. The Local Plan must be a major driver of reducing carbon emissions and building a resilient city.

Answer to Question 10 – we have only answered yes to making a representation to the Public Examination when we have raised an objection.

Answer to question 11 (provided only when the answer to Q10 was 'yes') :

South Yorkshire Climate Alliance would like to make the case for higher environmental standards and rapid reduction of carbon emissions

SPECIFIC COMMENTS PROVIDED IN RESPONSE TO QUESTION 8 FOR SUPPORTIVE COMMENTS OR QUESTION 9 FOR OBJECTIONS

SCA Comment 1: SUBMITTED

PART 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations.

Foreword/Contents Page

This comment relates to the overall structure of the document. It is difficult to understand why Part 1, which introduces the overall Vision and Spatial Strategy, with associated sub-area policies and site allocations, then goes on to include policies for a number of 'major topics'. Moreover, if major topics are to be introduced at this place in the plan, it is also difficult to understand why climate is not classed as a major topic, with an over-arching climate policy given for mitigation and adaptation. This is especially so as the issue is given prominence in Figure 1. Four of the major topic policies rightly cover some aspect of climate change, so an overarching climate policy would be fitting. An alternative would be to integrate the topic policies into Part 2. They are, of course policies that have to be taken into account in development management, which according to the document is the function of policies in Part 2. It is not clear what their relationship is to the policies given in relevant Chapters of Part 2.

SCA Comment 2: SUBMITTED

Chapter 2: Vision, Aims and Strategy

2.2 ff Vision: mention of the net zero aim in the text accompanying the Vision is welcome but there is no mention of mitigating and adapting to climate change within the Vision itself. Although the need to

respond to the climate emergency is welcome where mentioned in the Aims and Objectives (paras 2.10ff) this is such a crucial and urgent issue that it would be right to refer to it specifically within the overall Vision. More importantly, this plan does not appear to be compatible with the Council's policy of reducing carbon emissions to net zero by 2030. It's soundness is thus in question.

SCA Comment 3: SUBMITTED

Chapter 2: Vision, Aims and Strategy

2.12 Aims and Objectives: SCA welcomes the Objectives for an environmentally sustainable city and the significance given to this in Figure 1. (In the second bullet point the first "T" is missing). We would suggest adding associated wording to other objectives. Objectives for a strong economy - add " and to facilitate a just transition to a net zero emissions economy". Objectives for a connected city – add words in the first bullet point '...in order to combat climate change by reducing transport emissions...'; Objectives for a well-designed city - add "to minimise embodied carbon and ongoing carbon emissions and adapt to the effects of climate change".

SCA Comment 4: SUBMITTED

Chapter 3: Growth Plan and Spatial Strategy

3.1 Given the over-riding urgency of the climate emergency, it would be appropriate for this significant paragraph to include – again – specific mention of the need for a growth plan that leads to a reduction in emissions, aiding the Council's goal of reaching net-zero by 2030: while this is picked up in the Policy itself, under bullet point (i), it would be right to include a direct reference in the accompanying text. The paragraph talks of "sustainable growth" – but unless a definition is given, this could just mean housing, population or economic growth that could be maintained into the future. (There is no definition of "sustainable growth" in the excellent Glossary). Several of the points in the text would help in tackling climate change (for instance the focus on public transport, walking and cycling, and the aim for creating 20-minute neighbourhoods) but the underlying rationale in terms of needing to combat and deal with climate change needs to be stressed at the outset.

SCA Comment 5: SUBMITTED

Policy SP1: Amend introductory paragraph to read "...to meet Sheffield's identified needs and climate constraints". Bullet point (i) is particularly welcome, as are (j) and (k).

SCA Comment 6 (typing error): SUBMITTED

POLICY SA 7: The "h" of Broomhill is missing in the 2nd. Line and in e).

SCA Comment 7: SUBMITTED

TOPIC POLICIES - HOUSING

5.6 There is a welcome reference to the expectation of improved viability of development sites over time. Such opportunity should be taken to require higher carbon reduction and affordable homes standards.

SCA Comment 8: SUBMITTED

TOPIC POLICIES – ENABLING SUSTAINABLE TRAVEL

5.10 Welcome reference to the Pathways to Net Zero Report

SCA Comment 9: SUBMITTED

5.12 Welcome reference to SYMCAs transport role and also to Gear Change and the National Bus Strategy. SCA suggests it would be appropriate to mention here the Council’s support for SYMCA’s exploratory work re franchising of buses.

SCA Comment 10: SUBMITTED

5.13 Welcome the recognition here that future growth will have detrimental impacts on air quality, climate, health and journey times unless travel is managed and sustainable access and movement are prioritised over car-based travel.

SCA Comment 11: SUBMITTED

5.14, 5.15 and 5.16 with emphasis on the potential of rail are welcomed.

SCA Comment 12: SUBMITTED

POLICY T1: ENABLING SUSTAINABLE TRAVEL The detail of this policy is commendable. SCA strongly supports the delivery of the Midland Mainline Electrification Programme, not least for the resultant improvements in air quality.

Improvements to east-west rail connectivity are vital. SCA questions the need to deliver improved trans-Pennine road links however, as these would encourage more traffic across the Peak District (last National & Regional level bullet point).

SCA Comment 13: SUBMITTED

We welcome this policy. The last bullet point under City-Region level should be extended to refer to the Council's support for the SYMCA's investigation of franchising. (See comment 9 on 5.12 as well)

SCA Comment 14: SUBMITTED

5.19 Cargo bikes and consolidation hubs have a welcome mention here.

SCA Comment 15: SUBMITTED

BLUE AND GREEN INFRASTRUCTURE

POLICY BG1: The recognition of the need to protect, manage and enhance the blue and green infrastructure of the city so as to increase biodiversity and combat climate change is welcomed.

SCA Comment 16: SUBMITTED

DESIGN PRINCIPLES AND PRIORITIES

POLICY D1: SCA applauds the wording of a) which follows “Development should also:” and reads “be designed to mitigate climate change by reducing greenhouse gas emissions, to be resilient to future changes in temperature and rainfall patterns, and to minimise the relative heating of urban areas”.

SCA Comment 17: SUBMITTED

PART 2: Development Management Policies and Implementation

Introduction

1.3 This claims that Part 2 policies provide guidance on what is needed to make development economically, socially and environmentally sustainable. SCA is of the opinion that environmental sustainability is not being sufficiently stressed.

SCA Comment 18: SUBMITTED

1.7 The stress on action required by the climate emergency is welcome, however there is no evidence that the policies proposed will enable the Council's target of net zero emissions by 2030 to be met. Their soundness is thus in question. We argue that ES policies should therefore be made more ambitious.

Through local plans local authorities can set higher standards for carbon reduction in new developments than government policy currently requires. Failing to do so will create an immediate and costly retrofit burden for future owners or the public purse. SCC has argued that viability constrains the scope for doing this but considerable site-by-site variation is noted in the Whole Plan Viability Assessment (VA) on which these assumptions are based. Elsewhere SCC has reasoned that the VA under-states the amount of development value that can be captured for affordable housing and set more ambitious policies accordingly. In keeping with best practice across other local authorities, we argue Policy ES1 should be amended to require net zero carbon in new dwellings and non-residential developments from 2025 rather than 2030. As with affordable housing contributions, this shifts the burden of proof onto developers to seek exemptions on sites where viability constrains future-proofed development.

SCA Comment 19: SUBMITTED

Chapter 3: An Environmentally Sustainable City - Responding to the Climate Emergency

3.1 -3.3 The priority given to this issue at the beginning of the development management policies is welcome. The first sentence should end with "decade" not "decades" in view of the proven need to reduce emissions rapidly and Sheffield's 2030 net zero Target.

SCA Comment 20: SUBMITTED

3.4 True, because of the limitations of planning control there is all the more reason to set the highest possible environmental standards for future development in this plan.

SCA Comment 21: SUBMITTED

It should be stated in 3.5 that in 2025 the government will be introducing standards for existing and non-residential buildings as well as for new homes.

SCA Comment 22: SUBMITTED

3.8 The operational and embodied carbon emissions over the course of a building's lifetime could be greatly reduced if near passivhaus standards were adopted from the outset. Minimal heating costs and healthier living conditions would be assured for initial and subsequent occupants without the need for expensive modifications.

SCA Comment 23: SUBMITTED

POLICY ES1: We consider there is a strong case for near Passivhaus standards on all development from 2025 in response to the climate emergency, rather than waiting to 1 January 2030.

We welcome clauses a-f. There is a need to reduce emissions from all development, not just that resulting in new residential units or new non-residential buildings. The very many planning applications that deal with house extensions should not be allowed to proceed if they would then increase the building's emissions. If Policy ES2 can relate to all development, then so could Policy ES1. The draft Plan is somewhat confusing as Policy D1 would appear to cover this point (point (a) at top of page 106, Part 1. Some clarity is needed. Is it possible to replace the word "expected" by "required"? 4

The words “whenever possible” (in c), d), e) & f)) are an invitation to developers to argue that in this case it is not possible, but as the policy will be applied to such a wide variety of schemes, those words probably have to be kept.

SCA Comment 24: SUBMITTED

POLICY ES2: Welcome. Some clarity needed in terms of potential duplication within Policy IN1 in Part 1.

SCA Comment 25: SUBMITTED

POLICY ES3: Add in as the first sentence of the second to last paragraph “Schemes that utilise heat available from minewater in disused mines will be encouraged.” This chimes with the South Yorkshire Energy Strategy.

SCA Comment 26: SUBMITTED

POLICY ES4: Welcome. If all development will be controlled in terms of the features covered in ES4, it would seem reasonable to include emission control for all development (see comment 23 on Policy ES1). ES4 c) and d) are important in the expectation of higher summer temperatures and to mitigate against urban heat islands.

SCA Comment 27: SUBMITTED

POLICY ES7: Object. If Sheffield is aiming to become net-zero by 2030, there should be no exploitation of fossil fuels, we know that the plan is unable to specify this but the wording here is critical. Considering adding a new point “h) demonstrate that the proposed scheme will have a net zero impact on climate change”. This wording has been used by Kirklees and accepted by the Inspector. Kirklees policy LP42 criteria h) is on page 156 of their Plan. ([Kirkless Local Plan](#))

SCA Comment 28: SUBMITTED

Chapter 4 : Thriving Neighbourhoods and Communities

4.2 The importance of being able to walk, cycle or use public transport to meet daily needs is rightly stressed. The loss of bank branches, post offices and small food and general shops in recent months and years has weakened the vitality of many of the district and local centres. The inability of the planning system to secure a good balance of business/community uses is a weakness that this Draft Plan cannot address, unfortunately.

SCA Comment 29: SUBMITTED

4.16 This is a key paragraph. The likelihood that incremental increases in affordable housing can be delivered in a few years’ time on sites within the areas shown in this Plan as requiring 10% affordable housing is welcome. Increased development viability should also signal a requirement for higher environmental standards. It makes no sense to build homes and business premises that will require retrofitting at much greater expense than the developer would have to bear. Near Zero Energy Building standards if adopted in the original design would probably only increase building costs by about 6 - 10%.

SCA Comment 30: SUBMITTED

Creating Mixed Communities – Definitions. The definition of “highly accessible locations (on page 34) has the note that “All distances are as the crow flies”. We question whether sufficient account has been taken of Sheffield’s unduly steep hills.

Few bus routes penetrate the hilliest parts of the city, and, for many households, the journey from the local or district centre to their home involves a considerable climb, often with heavy shopping. No wonder they have recourse to a car if they can! The reference to “a 10 minute walk” and “a 5 minute walk” in NC11 is helpful in this regard.

SCA Comment 31: SUBMITTED

Chapter 5: A Strong Economy

5.10 This paragraph helpfully sets out sub sectors where AMID has a distinctive advantage. Many of these are developing or using processes which do not rely on fossil fuels. This is reinforced by POLICY EC1.

SCA Comment 32: SUBMITTED

Chapter 6: A Vibrant City Centre

POLICY VC1: Under Acceptable Uses..... bullet point 3 should read “Houses of Multiple Occupation...”

SCA Comment 33: SUBMITTED

Chapter 7: A Connected City

The focus on encouraging active travel, developing '20-minute neighbourhoods, and reducing car dependence is welcome. Some clarity needed with regard to any overlap with Policy T1 in Part 1 (see for instance para 8.3 of Part 2 which refers back to a Part 1 Policy). Encouragement of a shift to tram and train as well as to active travel is key to reducing carbon emissions and traffic congestion. It is noticeable that there is no specific reference to tram or train in these Development Management Policies.

SCA Comment 34: SUBMITTED

POLICY CO1: This is well worded policy aiming to minimise trips, reduce car reliance, maximise opportunities for cycling and walking, minimise and mitigate the impact of the development on the transport network, and “ d) maximise access to and use of public transport to the development through a variety of measures and enable at least minimum service frequency standards to be achieved;” Is there a definition of “minimum service frequency standards” and how can they be secured into the future?

SCA Comment 35: SUBMITTED

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

Policy GS1: Welcome. Some emphasis on the value of allotments and the need to maintain or increase their coverage in the city would be welcome, as there is a huge unmet demand and this would contribute to food security and healthier diet.

SCA Comment 36: SUBMITTED

Policy GS2: Welcome

SCA Comment 37: SUBMITTED

Policy GS4: Welcome. This would appear not to rule out the possibility of modestly sized solar farms, which could potentially contribute to achieving the net zero target.

SCA Comment 38: SUBMITTED

POLICY GS5: Welcome, Including the promise in 8.21 of a supplementary planning document on the Local Nature Recovery Network.

SCA Comment 39: SUBMITTED

POLICY GS6: Welcome. Much will depend on the efficacy of monitoring.

SCA Comment 40: SUBMITTED

Chapter 9: A Well-Designed City

Some clarity needed over relationship with Policy D1 in Part 1 is needed, and some more specific reference in the text of this Chapter about the significance of design for combatting and managing the impact of climate change. This is particularly so with regard to the text accompanying Policy DE2 and the wording of that Policy.
