**DORE NEIGHBOURHOOD FORUM**

**Response to The Sheffield Plan – Issues and Options – September2020**

**In our response we have been mindful of the Government’s consultation on the White Paper –‘Planning for the Future’ and its proposals and implications for *‘Growth, Renewal and Protection Areas’* and design codes. We have also taken account of the supporting documents for the Issues and Options consultation published on the SCC website.**

Q1a We agree with the draft Vision.

Q1b In particular we support the vision of an environmentally sustainable city with thriving neighbourhoods and communities and having a *distinct urban and rural identity.*

Q2a We agree with the broad thrust of the 8 Aims.

Q2b We support in particular those Aims for the City that align with the policies and aspirations of Dore Neighbourhood Plan:

* Aim 3: to have thriving neighbourhoods and communities with good access to open space, services and facilities, and
* Aim 6: of being a connected city that has sustainable transport by improved bus and local train provision and excellent digital connectivity by the extension of full-fibre broadband to the entire community, and
* Aim 7: that continues to cherish, protect and enhance its green spaces. *We propose the Green Belt and the Peak District Park Eastern Fringe be expressly included in this aim,* and
* Aim 8: that has a reputation for quality buildings with a strong local identity, for new development that is well designed to add to the City’s reputation.

Q3 We support Aim 1 of being a fair, inclusive and healthy city. The Dore Neighbourhood Plan Policies for new housing development in Dore Village Housing Area, particularly affordable homes, should help to create a healthier and fairer city by requiring new homes be built to higher standards, making them accessible for life-long living and maintaining private amenity space. Dore Neighbourhood Plan Policies also require a greater investment in public transport, cycling and walking infrastructure, making it easier for people to lead more active and healthier lifestyles.

You ask more generally how can new development help to create a fairer and healthier city and we agree with the Council’s observation that it is fundamentally right that the bulk of new housing development should occur as close as possible to existing and new employment opportunities and to key services to minimize travel and should be carried out to higher design and environmental standards and amenity provision than has been the case in the past. There is a need to narrow the gaps between wealthier and poorer areas, but not at the expense of the former, but rather by more leveling-up efforts.

Q4a&b We support the Council’s suggestions for how the Sheffield Plan could help to deliver a zero carbon city but the draft objectives on page 20 do not include (and should) the very important point made at the end of page 19 that “more compact cities, which have higher density homes, a mix of types of development, and good access to services and jobs, tend to have less impact on the environment than cities which spread.” The Dore Neighbourhood Plan supports the notion that the city should not spread further to the west.

**AIM 3**

The map on page 23 transposes market areas 9 and 10 and should be corrected.

**Market Area 7.**

We concur with the demand for smaller more affordable homes for downsizers.

**NEW HOMES**

Dore Neighbourhood Plan will, in the context of the Government’s proposal for *Renewal Areas*, provide for ‘smaller scale development where appropriate’ and ‘gentle infilling’ including resisting inappropriate development of residential gardens.’ (Planning for Growth, Government White Paper August 2020)

Q5a We agree the annual housing requirement figure should be the same as the figure calculated by the Government so long as the Government shows realism in the future in ensuring that the long term impacts of CV 19 and Brexit are reflected in the growth assumptions.

Q5b This will provide a clear and predictable basis for a sustainable statutory plan as set out in the Government’s White Paper Planning for Growth (August 2020)

Q6 What cries out from the summary of requirements for each of the thirteen market areas is that the greatest and most widespread need for new homes in Sheffield is for affordable homes for older people, for downsizers, for newly formed households and poorer income households. However, several market area summaries specifically refer to the need for *social rented housing*. Bearing in mind Sheffield’s current housing waiting list the proposal for 900 affordable dwellings per year over the plan period will require virtually all the affordable housing allocation to satisfy this requirement in the most disadvantaged neighbourhoods and communities. The City Council will need to utilize every measure available to implement this provision, including the use of council owned land, master planning Growth Areas, using compulsory purchase where necessary, the community infrastructure levy and the latest Government support for such provision.

Q7 Sheffield City Council should adopt the Government’s minimum space standards for new homes and the highest environmental and energy conservation standards.

Q12a&b Some of the consultation documentation acknowledges that development is already coalescing between Sheffield and Rotherham close to the Parkway and the Advanced Manufacturing Innovation District (AMID) and this trend needs to be more openly accepted so far as warehousing and distribution are concerned given the excellent proximity to the motorway network.

Q13a The Sheffield Central Area Strategy – Capacity Report produced by Planit- IE illustrates very well that, unless the City contemplates some intensification of tall residential buildings in the City Centre, it will find it almost impossible to meet its target for 20,000 new homes in the City Centre, close to jobs and services. There must, however, be realism about what people will accept in a post-Grenfell world and what the City has the skills and resources to achieve.

**AIM 6 - A connected city**

Q17-19b The most important transport issues the Plan needs to address are to provide for High Speed Rail and Northern Powerhouse Rail, enable improved rail services on the Sheffield/Hope Valley line to provide mass transit by rail in the South-West of the city and improve bus services in South-West Sheffield.

Q19 Yes

**AIM 7 – A green city**

We strongly support the draft objectives for a green city but questions 20a&b are limiting, relating to only one aspect of protecting and enhancing the City’s green environment.

Q20a We are concerned that *any* green space may be lost. Every opportunity should be taken to improve the poorer quality spaces, some of which may be in the more deprived areas of the city. Local communities should be consulted and engaged in their regeneration using the expertise of ecologists and landscape designers to make them valued and useful assets for social and health benefits. Such community projects could be hugely beneficial to communal self-worth.

An examination of all urban green spaces should be undertaken to protect, enhance and enrich the experience of all local communities.

We make further comment on Sheffield’s existing Green Belt at the end of this consultation response. Including the Green Belt in this section of the Consultation underlines that not only its critics but the Council itself is ambivalent about the purpose of the Green Belt. If the true purposes of Green Belt (as defined in the NPPF) and as referred to by the Council in the box on page 41 are unrelated to its quality in landscape and biodiversity terms, it doesn’t sit easily under Aim 7.

**Biodiversity**

We believe the issue of protecting biodiversity is an important consideration not given enough prominence in the Issues and Options document. There is a need not only to respond to the Climate Emergency challenge of ‘zero carbon’ but also to the Sixth Global Extinction emergency which is currently happening based on a massive loss of biodiversity across the globe and in the UK. There should be much more in the new Sheffield plan to set out how development is not to be achieved at the expense of further biodiversity loss.

We also believe it is vital for the new Sheffield Plan to build on early thinking in the existing Local Plan Core Strategy (Policy CS 73) to map and protect through policy a green and blue network of natural assets extending through the city (particularly but not exclusively in the river corridors) which provides not only vital recreational spaces to fulfill the Outdoor City ambitions, but also seeks to protect and enhance biodiversity and the vital wildlife corridors between the urban city, its woodlands and water bodies and the Peak District uplands. (This maintains the relevant Unitary Development Plan Policies and should enhance them). It should be a clear aim of development planning, not only to adopt the principle of biodiversity net gain in relation to each and every individual development proposal, but also to establish and protect nature recovery networks; and, of course, to link that with efforts to achieve more of our flood protection measures through natural rather than hard-build methods, whether in upland natural flood retention or well-managed lowland flood plain conservation washlands.

**AIM 8 -A well designed city with a strong local identity**

We strongly agree that ‘Much of the city’s character is defined by the distinctive landscape of river valleys, dramatic hillsides, extensive tree cover and views out to the Peak District’s setting’. We would emphasise the need to protect the setting of the Peak District National Park and the views of the city from the Park’s Eastern Fringe that characterize the rural setting of the City.

We agree the draft objectives for a well-designed city.

Q21 The Governments proposals for National and Local Design Codes will be important in achieving these objectives including the possible development of design codes by the Dore Neighbourhood Forum. (Planning for Growth, White Paper August 2020). It is important that we not only build attractive new homes, but we also build into them higher environmental standards of energy conservation and significantly greater provision for charging points for electrical vehicles.

**SPATIAL OPTIONS**

Q22a Which of the 3 spatial options do you prefer? **None,** althoughour thinking sits between Option A and Option B.

Q22b We explain the thinking in our answer to Q22a below at Q23a

Q23a We congratulate the City Council for its good record of building 95% of new homes on brownfield sites over the past 15 years and would support an option where the majority of new housing up to 2038 would continue to be concentrated on brownfield sites, avoiding the use of Green Belt. We strongly support:

* the Council’s aims to explore all reasonable alternatives before proposing release of Green Belt land for development,
* that Sheffield’s Green Belt boundary should only be changed to allow for homes to be built in exceptional circumstances where other reasonable alternatives have been explored and
* *that most of our Green Belt is too environmentally sensitive to be suitable for development.*

We observe that if Option B was pursued the City’s good record of building 95% of its new homes on brownfield sites would drop in the future to 87.5%; but going as far as Option C would see the brownfield proportion plunge to 75%, which surely challenges the thinking in the NPPF.

So the following paragraphs set out our suggestions about the alternative options to be adopted.

We feel a greater emphasis on higher densities in the Central and other urban areas is a more sustainable option. We tentatively reference the Government’s development zones in order to emphasise and simplify the focus of development on the urban areas:

a) A *Growth Area* in the City Centre developed at even higher densities with some taller blocks, is acceptable subject to provision of private balconies and improved community amenity space providing 21,000 dwellings. This would maximise the social, economic and environmental benefits of living in the city centre including proximity to employment, optimizing transport needs and the use of district heating and de-carbonising. The initial work carried out by Planit-IE in the Sheffield City Centre Area Strategy – Capacity Report (July 2020) suggests that such an ambition is more than theoretically feasible based on wide evidence of such developments elsewhere in the UK and abroad.

*b) Growth Areas* involving remodelling declining areas such as Neepsend/Shalesmoor and Attercliffe where high density housing development should be encouraged close to the city centre providing well over 4,000 dwellings as previously mooted in ‘Options for Growth’. The development of such areas should not just ‘transition to housing’ but require master-planning, the use of compulsory purchase orders where necessary and imaginative relocation of the existing industrial users. This is an opportunity long talked about but now needing to be seized.

c) *Renewal Areas* in the existing urban area, involving sites with planning permission (13,000), small and larger windfall sites (6,000) providing approximately 19,000 dwellings (City-Wide Options for Growth 2034). Many of these sites could provide for the housing needs of families and specialist accommodation for the elderly.

d) *Growth Areas* could be acceptable in the existing Green Belt if in the instances concerned the Green Belt Review scores are low, there are no strong landscape protection and/or biodiversity arguments against it, and the developments proposed are at a sustainable scale to create thriving and connected communities in locations such as Mosborough where land has previously been designated for housing and Norton aerodrome where the land is essentially a brownfield site. Both areas are well-connected to the city centre by public transport. These areas should include family houses with gardens and self-build sites providing 3,000 dwellings.

This suggested option provides significantly more sites than strictly required, allowing for a greater variety of developments, a broader choice for developers, variations in windfall opportunities and longer-term development opportunities, whilst also providing some wriggle-room if master planning/compulsory purchase delays occur elsewhere. All zones could include development sites not to be released in the Plan Period.

Q24 We comment in the table under point 5 below on sites in the Green Belt around Dore which appear as grey on the HELAA map

Q25a&b: We agree with the criteria set out on page 52 but suggest that one criterion could be added, viz. the proximity to employment opportunities and services. However, although it is stated that these criteria are in no priority order, we believe that the following criteria should designated as the most critical:

* The potential to make use of suitable brownfield sites and underutilized land.
* Whether the site is (or could be) well-served by public transport.
* The impact on assets or areas of particular importance (e.g. designated wildlife sites and irreplaceable habitats, the Peak District National Park and conservation areas).
* Impact on the purposes of the Green Belt (for sites in the Green Belt)

These four criteria are specifically in line with the main thrust of the Government’s latest White Paper. Local housing need, particularly the need for affordable housing, is another critical criterion, but this is a constant in each of the Options for residential development.

Q26 Please see our answer at (d) to Q23a above and the comment on Green Belt below

Q29 The following policies should not be lost from the UDP but rather retained and strengthened:

UDP Policy GE8 Areas of High Landscape Value and the Peak National Park

UDP Policy GE10 Green Network

**Other Issues of Concern, responding to the invitation on page 72.**

**Green Belt**

1.Sheffield’s Green Belt is one of the great national legacies, based as it was on the farseeing work of Ethel Haythornthwaite and Herbert Morrison in 1938.

2.The Green Belt is a fundamental and integral feature of the city in creating a fair and inclusive city, achieving a significant economic role with thriving neighbourhoods and communities and more significantly, in having a distinct urban and rural identity.

3.We believe all of Sheffield’s Green Belt fulfills the basic aims of green belt that the Green Belt Review will, in our view, confirm:

* To check the unrestricted sprawl of a large built-up area
* To assist in safeguarding the countryside from encroachment, and
* To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

4. More importantly, you acknowledge that, in addition to the numerical findings of the Review, ecological and landscape quality would be factored into deciding which sites (if any) should be allocated for development and you acknowledge that you ‘don’t want to see building on Sheffield’s countryside or Green Belt’ and that most of our Green Belt is too environmentally sensitive to be considered for development. It is our strong view that the Green Belt to the west of the urban/suburban city is particularly sensitive and that is confirmed by the Peak District National Park Landscape Character Assessment which flows over the National Park boundary up to the western developed edge of the city. Turning now to Dore itself, sitting between the Green Belt setting of the National Park and the precious Ecclesall Woods:

* All of the Green Belt in Dore Neighbourhood lies within the Peak District National Park Authority’s Landscape Strategy and European Landscape Convention Action Plan area that provides for a management regime that flows across the National Park boundary and Green Belt. We are especially concerned in Dore Neighbourhood to safeguard the Eastern Moorland Fringe of the Peak District and the fragile area of Green Belt that protects and enhances the national designated area and the Ancient Ecclesall Woods with which it is closely connected.
* Much of the Green Belt in Dore Neighbourhood is designated as an Area of High Landscape Value adjacent to the Peak National Park. While this policy within the city’s existing Local plan is weakened by the inadequacy of Sheffield’s own 2011 Landscape Character Assessment, it could be strengthened by relying more on the National Park’s more thorough Assessment.
* There are several Green Corridors identified as part of the City’s Green Network proposals crossing the Green Belt in Dore Neighbourhood including the Old Hay Brook/Blacka Moor Corridor, Ryecroft/ Dore Moor Corridor and Ryecroft /Limb Valley Corridor
* We note in particular that much of the moorland immediately within the National Park boundary at the points within Dore Neighbourhood Area where it is contiguous with the City’s Green Belt are defined by the PDNPA as constituting part of the Park’s Natural Zone, (that is the most wild and beautiful areas of the Park where the impact of man is least evident and a protective setting is most important).
* It is very strongly felt in Dore (as we have tested by an opinion survey) that development has crept quite far enough towards the National Park boundary and that, for example, Long Line should not be developed any more than is provided for in Dore Neighbourhood Plan Policy 4.

5. We advise that a more proactive stance be taken to safeguard and enhance the Green Belt particularly adjacent to the Eastern Moorland Fringe of the National Park in cooperation with the PDNPA and their Landscape Strategy, and in respect of this advice we give the following answer:

Returning to Question 24, our appraisal of the grey sites not included in the HELAA (but mapped within it) within the Dore Neighbourhood Area demonstrates that none should be removed from the Green Belt or allocated for housing:

***Appraisal of priority criteria for sites within the Green Belt \* green belt purposes***

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Sites** | **Brownfield** | **Transport Infrastructure**  **Capacity** | **\*Checks unrestricted sprawl** | **\*Safeguards countryside from encroachment** | **\*Assists**  **in urban regeneration** | **Other factors against removal from green belt designation and release for housing, including UDP and Dore Neighbourhood Plan policies.** |
| Land adjacent to 127-139 Long Line subject of a planning application | NO | NO | YES | YES | YES | 1.PDNPA Landscape Strategy  2.Area of High Landscape Value  3. Subject to DN Policy 2  4. Subject to DN Policy 3  5. Subject to DN Policy 4  6.Unsustainable: lack of social facilities and limited public transport. |
| Land at the junction of Long Line and Hathersage Road | NO | NO | YES | YES | YES | 1. PDNPA Landscape Strategy  2.Area of High Landscape Value  3.Subject to DN Policy 2  4.Subject to DN Policy 3  5.Unsustainable: Lack of social facilities and limited public transport. |
| Land west of Newfield Lane north of Wag Wood | NO | NO | YES | YES | YES | 1.PDNPA Landscape Strategy  2.Area of High Landscape Value  3. Subject to DN Policy 2  4. Subject to DN Policy 3  5. Unsustainable; lack of social facilities and limited public transport |
| Land west of Newfield Lane and east of Redcar Brook | NO | NO | YES | YES | YES | 1.PDNPA Landscape Strategy  2.Area of High Landscape Value  3. Subject to DN Policy 2  4. Subject to DN Policy 3  5. Unsustainable: lack of social facilities and public transport |
| Land east of Cross Lane | NO | NO | YES | YES | YES | 1.PDNPA Landscape Strategy  2.Green Corridor  3. Subject to DN Policy 2  4.Subject to DN Policy 3 |
| Land north of Parkers Lane and west of Ash House | NO | NO | YES | YES | YES | 1. PDNPA Landscape Strategy  2. Green Corridor  3. Subject to DN Policy 2  4. Subject to DN Policy 3 |
| Land north of Parkers Lane and south of Ash House. | NO | NO | YES | YES | YES | 1. PDNPA Landscape Strategy  2. Green Corridor  3. Subject to DN Policy 2  4. Subject to DN Policy 3 |
| Land north of Parkers Lane and west of Limb Lane | NO | NO | YES | YES | YES | 1.PDNPA Landscape Strategy  2. Green Corridor  3. Subject to DN Policy 2  4. Subject to DN Policy 3 |
| Ryecroft Farm | NO | NO | YES | YES | YES | 1. PDNPA Landscape Strategy  2. Green Corridor  3. Subject to DN Policy 2  4. Subject to DN Policy 3 |
| Land south and east of Old Hay Lane | NO | NO | YES | YES | YES | 1. PDNPA Landscape Strategy  2.Area of High Landscape Value  3. Green Corridor  4. Subject to DN Policy 2  5. Subject to DN Policy 3  6. Subject to DN Policy 7  7. Part Acquired under Open Spaces Act 1906 required to be maintained under the Act.  8. Part subject to DN Proposal 3 in the Dore Neighbourhood Plan  9. Part subject to flood risk of Old Hay Brook |

As planning partners with the City Council, the Dore Neighbourhood Forum would expect to be consulted by the City’s planners on their developing thinking on Green Belt sites in Dore Neighbourhood Area as their assessment is extended beyond the initial Green Belt Review to consider them against biodiversity criteria, landscape value criteria, proximity to reliable public transport and any other factors.

**Implementing the Plan**

We recommend developing the plan in line with the Government’s White Paper (August 2020) in respect of the use of development zones and the adoption of robust design codes.

DC/11/10/20