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1. Introduction

- 1.1 This document is a response by Joined Up Heritage Sheffield (JUHS) to the draft Sheffield Plan policies dated 26th October 2022.
- 1.2 Joined Up Heritage Sheffield is a charity (registered No. 1180945) that seeks to bring together organisations and individuals interested in heritage, in all its variety, to promote better understanding, a strategic approach and a better-resourced and better-connected presentation of heritage. We provide a platform for 46 local community groups and have [number] subscribers with whom a draft of this response has been shared for comment.
- 1.3 JUHS has published a Heritage Strategy¹ that establishes a vision for Sheffield's heritage. This is that within ten years Sheffield will achieve these five Aims:
1. Understand and celebrate its heritage;
 2. Champion a diverse heritage reflecting diverse Sheffield;
 3. Exploit the economic potential of heritage;
 4. Support the educational value of heritage;
 5. Recognise the social, wellbeing and environmental benefits of heritage.
- 1.4 Sheffield City Council supports the aims and intentions of the Heritage Strategy, and under its new constitution the Transport Regeneration and Climate Policy Committee, which includes Planning in its remit, has a responsibility to champion heritage. It should therefore be expected that the new Sheffield Plan ("the Plan") will include an explicit and strategic role for the city's heritage and seek to promote the five Aims.
- 1.5 The Council has also recently resolved to explore ways of using our heritage to support businesses. The Plan must support this resolution by recognising the significant positive economic role of heritage and harnessing it as a driver of economic growth.
- 1.6 Both expectations call for much greater attention in the Plan to the role of heritage, its conservation and enhancement than in the Unitary Development Plan and Core Strategy which it will replace.
- 1.7 A paradigm shift is required from the out-dated view of heritage policy as existing primarily to protect the historic environment from conflict with development to one in which conserving and capitalising upon a high quality historic environment is critical to sustainability in development and economic growth, to the environment and to society at large.

¹ The Heritage Strategy can be found at <https://www.joinedupheritagesheffield.org.uk/heritage-strategy>.

2. Soundness

- 2.1 The emergence of a draft Plan is very welcome, and a significant achievement against a background of fluctuating Government policy, unrealistic housing land allocation requirements, changes in Council management, and cuts imposed on the Council's budget constraining Planning Department resources. However, our view is that the Plan is not sound in respect of its provisions for protecting and capitalising on heritage.
- 2.2 The Plan contains some positive provision for heritage Aim 8 "A well-designed city" has been updated to include a reputation for valuing heritage assets, which is very welcome. Other positive aspects include:
- (a) Encouraging the retention and re-use of buildings (policy ES1), although the lack of a requirement for Whole Life Cycle Carbon Assessments needs explanation;
 - (b) Policy on geodiversity (GS8);
 - (c) Placing heritage at the head of design policy as part of the Council's vision, overall aims, and objectives; and articulating the scope of the city's distinctive heritage (policy D1);
 - (d) A common policy for both designated and non-designated heritage assets (policy DE9);
 - (e) Acknowledgement of heritage impact in some policies not primarily concerned with heritage (ES2, ES3, NC9, GS1, GS2, GS3, DE1, DE5, DE6, DE7), or in their supporting text.
- 2.3 The Plan does not meet the requirement for a positive strategy for the conservation and enjoyment of the historic environment stated in the National Planning Policy Framework² (NPPF) paragraph 190.
- 2.3.1 The Plan contains positive statements about heritage, and some policies that advocate a positive attitude to heritage, but these do not amount to a strategy.
- 2.3.2 A reference to the "positive strategy" requirement in an earlier draft of the Plan has been removed, and more recently the Council has suggested that a strategy is unnecessary since heritage is supported by several individual policies. Other local authorities have chosen to do both³.
- 2.3.3 This concern is further explored in section 4.1.
- 2.4 The Plan does not meet the requirement in NPPF 16(a) be prepared with the objective of contributing to the achievement of sustainable development, as defined in NPPF 8:
- 2.4.1 The Plan contains many policies that do support this objective, but the absence of a strategic approach which capitalises upon and seeks to increase the contribution of the historic environment to economic, social and environmental sustainability means that it could do significantly more in this respect.
- 2.4.2 The limitations are shown by the objective that supports Aim 8 "To protect, conserve and enhance buildings, landmarks and areas that are attractive, distinctive and/or of heritage or archaeological value". This reflects a limited vision that seeks to protect heritage, but does not give it a significant role in policies to build economic, social and environmental sustainability.
- 2.5 The Plan does not meet the requirement in NPPF 16(c) that plans should be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees:
- 2.5.1 A consultation in October 2020 focused mainly on the provision of land for housing, and draft policies were not shared at that time.
- 2.5.2 Draft policies were made available in November 2021 which closely resemble those in the draft approved for submission. An offer was made by JUHS to comment on these, but it was the Council's preference for comments to be received only during the current public consultation.
- 2.5.3 There has been no opportunity for local organisations to help to shape or refine individual policies prior to the formal approval of the submission draft.

² National Planning Policy Framework published July 2021, available at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>.

³ For example the Lambeth Plan, which is supported by a Historic Environment Strategy while containing policies relating to heritage, see <https://beta.lambeth.gov.uk/planning-building-control/planning-policy-guidance/lambeth-local-plan-2021>.

2.6 The Plan does not make sufficient provision for conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, as required by NPPF 20(d), nor ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, as required by NPPF 130(c):

2.6.1 Although the Plan contains many policies which aim to protect and even enhance the historic environment, these are incomplete in their scope.

2.6.2 This is especially so in regard to the heritage themes distinctive to Sheffield; the role of waterways and other green and blue infrastructure as heritage assets; the creation of new protections such as Conservation Areas and the Local Heritage List; the removal of protection from Areas of Special Character; and the absence of Heritage Impact Assessments for some sites.

2.7 In order to achieve soundness, improvements are needed to the scope, detail and robustness of heritage policy to make sufficient provision for the conservation and enhancement of the historic environment, and to enable Sheffield to celebrate heritage in all its diversity and capitalise on the full range of its benefits:

- (a) The list of heritage themes considered distinctive to Sheffield (policy D1) needs to be expanded;
- (b) New Conservation Areas should be proactively sought and designated, in particular in Castlegate;
- (c) Provision has to be made to protect Areas of Special Character defined by the UDP;
- (d) A policy is needed relating to the Local Heritage List and its ongoing expansion;
- (e) Historic waterways and waterpower infrastructure require more explicit and detailed protection. There are special concerns regarding policies GS5, GS6, GS9, GS10 and GS11 which if not amended could have serious unintended negative consequences;
- (f) Policies on blue and green infrastructure should recognise and protect its heritage significance (policies BG1, GS3 and GS7);
- (g) Greater clarity is needed regarding re-use, recycling and recovery of buildings and materials (policy ES1);
- (h) Public art policy requires more detail, especially on commemorative structures and contested heritage (policy DE8);
- (i) Special attention should be paid to heritage relating to mineral extraction and processing (policies ES8 and GS8);
- (j) Area characterisations and site allocations need greater coherence, consistency and detail. Heritage Impact Assessments should be made for sites without designated heritage assets. The Council could take advantage of knowledge in the voluntary heritage sector to supplement this;
- (k) Supporting text should give much greater emphasis to the wide range of economic, environmental and social benefits underpinned by heritage.

2.8 To achieve soundness there is also a need for new policies regarding:

- (a) The importance of the Local Heritage List and its ongoing expansion;
- (b) Explicit protection for the social and historic importance of public houses;
- (c) The impact of development on Culture;
- (d) The impact of development on Diversity.

3. List of proposed improvements

Policy or text to amend	Reason	Ref
New: Positive strategy for heritage	Create a positive strategy for the conservation and enjoyment of the historic environment, as required by NPPF 190	4.1
Supporting text	Emphasise economic, environmental and social benefits	4.2
SP1 Overall Growth Plan	Improve scope, detail and robustness of heritage policy	4.3
SA1 to SA9, CA1 to CA6 Sub-Area Strategy and Character Areas Annex A Allocated Sites	Improve area characterisations and details of their heritage Clarity and completeness of information Heritage Impact Assessments for sites without designated heritage assets	4.4
BG1 Blue & Green Infrastructure	Protect historic waterways and waterpower infrastructure Recognise heritage significance of blue/green infrastructure	4.5
D1 Design Principles and Priorities	Expand list of heritage themes distinctive to Sheffield Improve scope, detail and robustness of heritage policy	4.6
ES1 Net Zero Carbon	Prioritise re-use, recycling, recovery of buildings and materials	4.7
ES8 Secondary and Recycled Aggregates	Prioritise re-use over reprocessing	4.8
NC1 Strategic Housing Sites	Foster a sense of ownership and belonging in neighbourhoods	4.9
NC2 Residential Zones	Protect historic use by small manufacturing businesses	4.10
NC17 Hospital Zones	Protect heritage assets in Hospital Zones	4.11
CO3 Broadband and Telecommunications	Protect heritage assets near communications infrastructure	4.12
GS3 Landscape Character	Recognise heritage significance of blue/green infrastructure	4.13
GS5 Development and Biodiversity GS6 Biodiversity Net Gain GS9 Managing Flood Risk GS10 Water Resources GS11 Sustainable Drainage Systems	Protect historic waterways and waterpower infrastructure	4.14
GS7 Trees, Woodland and Hedgerows	Recognise heritage significance of blue/green infrastructure	4.15
GS8 Safeguarding Geodiversity	Protect historic mineral extraction sites	4.16
DE1 Local Context and Development Character	Improve scope, detail and robustness of heritage policy	4.17
DE2 Design and Alteration of Buildings	Quality and appropriateness of upward extensions Maintenance of quality in approved schemes	4.18
DE6 Design of Tall Buildings etc.	Identify Tall Building Areas and Landmark Buildings	4.19
DE8 Public Art	Policy on retention, commemorative and contested heritage	4.20
DE9 Heritage Assets	Align policy with statutory protection of designated assets Provide for the creation of new Conservation Areas Improve scope, detail and robustness of heritage policy Clarify public benefit justifications Require rigorous assessment of alternatives Retention of chimneys on historic buildings	4.21
New: Local Heritage List	Recognise the importance of the Local Heritage List Protect Areas of Special Character identified in the UDP	4.22
New: Public Houses	Protection the social and historic importance of public houses	4.23
New: Culture	Achieve positive impact on culture	4.24
New: Diversity	Achieve positive impact on diversity and diverse heritage	4.25
Part 2 11.19 (Implementation)	Use Public Land and Resources to protect and improve heritage assets	4.26

4. Proposed improvements in detail

4.1 New policy: Positive strategy for heritage

Positive strategy for heritage

A policy is needed describing a positive strategy for the conservation and enjoyment of the historic environment, including provisions such as:

- (a) Identifying new or extended Conservation Areas, proposals for enhancing the historic significance of existing areas, and other activities within the statutory duties of the Local Planning Authority⁴;
- (b) Encouraging or requiring developments involving heritage assets to include information boards or means of increasing public appreciation of the asset;
- (c) Identifying assets, asset groups or areas in which developers will be expected to restore historic fabric, for example shopfronts;
- (d) Taking advantage of Heritage Action Zones and other initiatives by Historic England, Government and other bodies that promote heritage-led regeneration;
- (e) Setting standards for completeness and accuracy such that Heritage Statements can aid creation and maintenance of the Historic Environment Record (HER), expected to become a statutory requirement;
- (f) Using heritage to support businesses, especially (but not exclusively) those in the hospitality sector, and rebuild our economy;
- (g) Heritage-based neighbourhood engagement and knowledge-sharing initiatives to foster stewardship and a sense of belonging, especially in areas with fewer recognised heritage assets, to create more sustainable communities.

Supporting text

Insert supporting text on the importance and benefits of heritage 4.2 (unless used elsewhere).

- 4.1.1 There is a particular need for a positive strategy for the conservation and enjoyment of the historic environment, as required by NPPF paragraph 190:
- 4.1.2 As it stands, the Plan's provisions are mainly concerned with protecting heritage. Heritage conservation is acknowledged as having benefits, but there is no strategy for maximising or capitalising on these or for improving the historic environment. The NPPF outlines the benefits and opportunities that such a strategy should take into account, but simply acknowledging these does not in itself amount to a strategy.
- 4.1.3 The reference to the NPPF positive strategy requirement appeared in an earlier draft of policy DE9⁵, but has since been removed. This is a retrograde and unacceptable step and must be rectified.
- 4.1.4 This strategy might take the form of a separate Historic Environment Strategy document, an approach taken by other planning authorities⁶. This would describe harnessing the historic environment to deliver maximum benefit, including overall approaches and specific localised aims. It would be supported by policies in the Plan to enhance, repair, understand and celebrate heritage, in addition to those that to protect it from harm.
- 4.1.5 This policy would benefit from additional supporting text on the importance and benefits of heritage as outlined in 4.2, unless included elsewhere.

⁴ Planning (Listed Buildings and Conservation Areas) Act 1990 ss69-72.

⁵ Working Draft 29 November 2021 policy DE10, now renumbered.

⁶ For example the Lambeth Plan policy Q18 p207, available at <https://beta.lambeth.gov.uk/planning-building-control/planning-policy-guidance/lambeth-local-plan-2021>.

4.2 Supporting text on the importance and benefits of heritage

It is strongly recommended that in addition to improving individual policies as described in this section, supporting text be revised to include robust statements of the value of heritage, its contribution to economic, social and environmental sustainability, and the reasoning behind the policies.

This would be most appropriate in the proposed new policy for a **Positive strategy for heritage**. Alternatives to this are **Policy D1: Design Principles and Priorities** and **Policy DE9: Development and Heritage Assets** and **Policy SP1: Overall Growth Plan**.

- 4.2.1 The text supporting policies sets out the importance given to heritage in assessing proposals. It should give the reasoning behind that importance, guide developers to make desirable proposals, describe the wide scope in which heritage will be a consideration, and indicate how planning judgement will be exercised.
- 4.2.2 Heritage, in all its forms, is an important strategic resource because of its significant contributions to economic, environmental and social sustainability. This is in addition to the inherent desirability of conserving assets of historical or architectural importance and our duty to be good and responsible stewards of what we have inherited from the past for the benefit of present and future Sheffield people.
- 4.2.3 The density of heritage assets correlates with increased business presence and turnover, and especially strongly for firms in the creative, knowledge and tourism sectors⁷. In areas of heritage-led regeneration, the historic environment is important to the great majority of people in choosing to live, work or visit.
- 4.2.4 Policy D1 acknowledges the contribution of heritage assets to character and distinctiveness and that there are benefits to the wider culture and economy of the city. Little else is said about the value of heritage and its benefits. The language used is muted even compared with the UDP, and is significantly less robust and detailed than that used in the recent plans of other Local Planning Authorities, for example the London and Lambeth Plans^{8,9}.
- 4.2.5 In 2019, the heritage sector in England contributed over £14bn GVA to the national economy, ahead of major sectors such as aerospace and defence¹⁰. Heritage stimulates spending by visitors and influences business location decisions. The historic environment attracts the most productive and distinctive businesses, creates demand and premiums for property, and brings in customers and workers¹¹.
- 4.2.6 The historic environment both defines the character and identity of the city and expresses its great diversity. It underpins the city's cultural life and creativity, and is a rich educational resource for all ages. It enhances mental health and general wellbeing: even living close to historic places is associated with better health¹².
- 4.2.7 Conservation and retrofitting of historic buildings and landscapes can conserve resources and mitigate the effects of climate change, and build skills, methods and technologies that can be re-applied more widely.

⁷ The role of culture, sport and heritage in place shaping, Trends Business Research Ltd, NEF Consulting Ltd and Middlesex University, October 2016 (data from 2013).

⁸ The London Plan, Greater London Authority, March 2021, available at <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>.

⁹ Lambeth Local Plan 2020–2035, London Borough of Lambeth, adopted September 2021, available at <https://beta.lambeth.gov.uk/planning-building-control/planning-policy-guidance/lambeth-local-plan-2021>.

¹⁰ Source: Historic England, Heritage and the Economy 2020 (and related publications), available at <https://historicengland.org.uk/research/heritage-counts/heritage-and-economy/>.

¹¹ Source: Heritage Lottery Fund, New ideas need old buildings, 2013 (and related publications), available at <https://www.heritagefund.org.uk/about/insight/research/new-ideas-need-old-buildings>.

¹² Source: Historic England, Heritage and Society 2020 (and related publications), available at <https://historicengland.org.uk/research/heritage-counts/heritage-and-society/>

- 4.2.8 Engagement with the historic environment boosts health and well-being, and serves the NHS's Five Ways to Wellbeing. The underlying narrative and familiar surroundings of a cared-for historic environment are crucial to the sense of belonging that promotes a sense of safety, security and ownership for residents, which underpins community cohesion.
- 4.2.9 These wide-ranging benefits serve many Plan objectives, contribute to the objectives of economic, social and environmental sustainability in the NPPF, and the five Aims of the Heritage Strategy. They merit explicit recognition in the supporting text and should give significant weight both to policies that protect heritage and policies that support its productive use.

4.3 Policy SP1: Overall Growth Plan

The following amendments are proposed:

Policy SP1

Amend SP1(m) to read "Protection, management, and enhancement of designated and non-designated heritage sites and assets, with a focus on achieving the highest standards of new development whilst respecting the industrial and cultural significance of the existing historic environment across Sheffield (see Policy DE1 and Policy DE9)."

Supporting text

Insert supporting text on the importance and benefits of heritage (see 4.2; unless used elsewhere).

- 4.3.1 Policy SP1 (m) includes heritage protection, management and enhancement amongst the Plan's key deliverables, but only refers explicitly to designated assets and the built environment.
- 4.3.2 This policy would benefit from additional supporting text on the importance and benefits of heritage as outlined in 4.2, unless this has been included in the proposed new policy for a Positive strategy for heritage 4.1 or elsewhere.

4.4 Policies SA1 to SA9 and CA1 to CA6: Sub-Area Strategy Annex A: Site Allocations Schedule Heritage Impact Assessments

The following amendments are proposed:

Policies SA1 to SA9 and CA1 to CA6

For each Sub-Area, Character Area, Priority Location and Catalyst Site:

- List all Conservation Areas;
- Describe the character of the historic environment, including principal heritage assets;
- Describe how the historic character and identity will be used strategically to sustain the direction of its economic, social or environmental development.

In the Central Sub-Area, describe characteristic building types and heights in each Character Area, Priority Location and Catalyst Site.

Annex A

Adopt a table format containing the following entries:

- Site area
- Ward
- Ownership
- Current use
- Transport accessibility
- Flood risk
- Heritage
- How chosen
- Planning history
- Preferred use
- Design principles/key considerations

Heritage information should identify affected heritage assets and their importance, including any Conservation Area in which the site is located.

Heritage Impact Assessments

Assessments should also be made for sites without designated heritage assets, identifying and providing for the protection of non-designated heritage assets.

- 4.4.1 Information that will influence development on any site needs to be as complete as possible in advance to avoid unexpected delays and additional costs if new information comes to light during the planning process. This is especially true of the historic environment. The heritage of an area and its historic environment are amongst the defining elements in its character and identity, and can and should have a substantial influence over the character of new development.
- 4.4.2 Sheffield benefits from a large number of voluntary heritage groups with very wide experience and deep knowledge. The Council should take advantage of this resource to ensure that the historic environment, its significance and vulnerabilities are fully and accurately described. This information can then inform masterplans, site design and development briefs and pre-application enquiries.

- 4.4.3 In the Sub-Area Strategy (Part 1 Section 4) heritage is often acknowledged in the Central Sub-Area, but the approach is inconsistent. Heritage is sometimes mentioned in the supporting text, but only occasionally in the policy itself. It is sometimes mentioned in descriptions of Priority Locations and Catalyst Sites, but not for the wider Sub-Area. Where it is mentioned this is mostly limited to providing for it to be complemented by new development. Reference to heritage in non-central Sub-Areas is very limited.
- 4.4.4 Conservation Areas are generally identified in descriptions within the Central Sub-Area, although not always accurately. Only one other Sub-Area mentions the presence of any of the city's 38 Conservation Areas.
- 4.4.5 Descriptions of Allocated Sites (Annex A) sometimes note the presence of heritage assets and place conditions on development. However, often the affected heritage assets and their importance are not identified, and Conservation Areas are rarely identified.
- 4.4.6 The unstructured list format used in Annex A risks overlooking important provisions. A table format is recommended to ensure that all information is complete and legible¹³.
- 4.4.7 Heritage Impact Assessments were only carried out for sites with designated heritage assets. On such sites, non-designated heritage assets are taken into account, and this should also be done for sites without designated heritage assets.

4.5 Policy BG1: Blue & Green Infrastructure

The following amendments are proposed:

Policy BG1

Add "the conservation of heritage assets" to the list of benefits (first paragraph);

Add "and their associated waterpower infrastructure" to the list of main river corridors;

Add "registered parks and gardens" to the list of key elements of the Green Network.

Part 1, Map 17 on p110

Add locations of registered parks and gardens.

See also amendments to D1, GS3, and GS5 to GS11 inclusive.

- 4.5.1 Policy BG1 protects blue and green infrastructure on the basis of its benefits to biodiversity, combating climate change, recreation and landscape character. It calls particular attention to the Green Network, including the river corridors and major parks and green spaces.
- 4.5.2 Waterpower infrastructure is recognised in policy D1 as a heritage asset. Most, if not all, of the city's blue and green infrastructure consists of heritage assets, of significance beyond industry, spanning monastic fish ponds, common lands, deer parks and chases. Protecting and managing blue and green infrastructure supports the benefits of a high-quality historic environment, so must conserve historic significance.
- 4.5.3 Dams, goits and weirs provide essential habitat, including where they are no longer fully in water, and so these heritage assets should also be protected as part of the blue and green infrastructure.
- 4.5.4 Registered parks and gardens are both designated heritage assets and green infrastructure so should be recognised as part of the Green Network.

¹³ The clarity this allows for can be seen in the Lambeth Plan, for example Site 1 p129.

4.6 Policy D1: Design Principles and Priorities

The following amendments are proposed:

Policy D1

Amend D1(a) to read “Sheffield’s distinctive heritage, particularly the buildings, structures, settlement forms, landscapes and landscape features associated with...”;

Extend the list of categories in D1(a) to include those listed in Appendix B;

Amend the ninth listed category in D1(a) to “The city’s rural setting and topography” (so as to avoid the duplication of “landscapes”);

Append to D1(a) “and other categories of particular historical importance in the city, as may be identified from time to time by the Local Planning Authority and specified in a Supplementary Planning Document”;

Append to the whole policy “Development that does not conform with this policy will not be considered well-designed and will therefore be refused.”

Supporting text

Insert supporting text on the importance and benefits of heritage (see 4.2; unless used elsewhere).

- 4.6.1 Policy D1 calls for development to take advantage of and enhance Sheffield’s distinctive heritage, particularly the buildings, structures and settlement forms associated with a list of categories. This is a welcome improvement over the UDP.
- 4.6.2 The policy as written draws attention to built heritage. Sheffield’s landscape and landscape features form the setting for buildings, but are also in themselves important heritage assets, associated with one or more of the listed categories.
- 4.6.3 The list of categories is relatively short, and needs to be enlarged to include others of particular importance in Sheffield. A proposed list is given in Appendix B.
- 4.6.4 Further categories may need to be added based on new research or public feedback, and an amendment is included to allow for these to be specified in a Supplementary Planning Document.
- 4.6.5 Policy D1 aims to set a high standard for design in development. NPPF 134 states that development that is not well designed should be refused, and the Plan should say the same.
- 4.6.6 This policy would benefit from additional supporting text on the importance and benefits of heritage as outlined in 4.2, unless this has been included in the proposed new policy for a Positive strategy for heritage 4.1 or elsewhere.

4.7 Policy ES1: Measures Required to Achieve Net Zero Carbon Emissions in New Development

The following amendments are proposed:

Policy ES1

Amend ES1(c) to read “adopt a ‘re-use first’ approach to buildings and adhere strictly to the hierarchy of waste, prioritising in descending order the retention of the building, recovery and re-use of building materials in their original form, recycling or remanufacturing material into a new product, energy recovery, and disposal”;

Add a requirement to provide a Whole Life Cycle Carbon Assessment.

See also amendments to ES8.

- 4.7.1 Government advice defines a clear hierarchy of waste¹⁴, with re-use of material in its original form (e.g. reclaiming and re-using bricks, setts or decorative features) the highest priority; recycling (the reprocessing of waste into a new product) next; and energy recovery last. The Climate Emergency and mandatory targets on carbon emissions justify a strong policy that recognises the lower energy and climate impacts of re-use.
- 4.7.2 Re-use of buildings is the most desirable, strongly supported RICS, RIBA, the House of Commons Environmental Audit Committee, European Academies Science Advisory Council (which includes the Royal Society), and the Royal Academy of Engineering.
- 4.7.3 Policy ES1 encourages the retention and re-use of buildings, but the lack of a requirement in an earlier draft for Whole Life Cycle Carbon Assessments appears a retrograde step and needs explanation.
- 4.7.4 The Plan should adopt a “re-use first” policy for both buildings and materials¹⁵, rigorously enforcing the waste hierarchy and allowing lower priorities only where higher priority options are impossible.
- 4.7.5 Whole Life Cycle Carbon Assessments should be required, and those which appear to justify lower priorities in the hierarchy should expect to be scrutinised in detail. In particular:
- (a) The benefit of significant carbon emission gains in the short term should be taken into account even where these are eventually outweighed by operational gains over the design life of the building.
 - (b) Assessments that displace a desirable use, for example by partially replacing an existing building, or by change of use, should estimate the emissions displaced to other sites to re-provide that use.
 - (c) Assessments will not provide justification for harm to heritage assets.
- 4.7.6 Façade treatments (replacing a building behind a retained façade) are neither building re-use nor appropriate conservation and should be resisted except as a last resort, or where (exceptionally) the façade embodies a building’s architectural or historic interest and there is a strong justification not to retain more of the structure. If a developer chooses not to re-use a building with a façade of architectural or historic interest, the Whole Life Cycle Carbon Assessment will not provide a justification for demolishing the façade.

¹⁴ See DEFRA’s guidance at <https://www.gov.uk/government/publications/guidance-on-applying-the-waste-hierarchy>.

¹⁵ See for example the London Plan 2021 p115 Figure 3.2 - Circular economy hierarchy for building approaches, available at <https://www.london.gov.uk/programmes-strategies/planning/london-plan/new-london-plan/london-plan-2021>.

4.8 Policy ES8: Use and Production of Secondary and Recycled Aggregates

The following amendments are proposed:

Policy ES8

Append “Demolition waste should be used in the production of recycled aggregates only where all higher priorities in hierarchy of waste have been exhausted.”

See also amendments to ES1.

- 4.8.1 The positive intention is to avoid new quarrying and transportation and to divert demolition waste from landfill, but it could encourage reprocessing into aggregates rather than re-using with minimal processing.
- 4.8.2 Developments must adhere to the hierarchy of waste¹⁶. Re-use of material in its original form (e.g. reclaiming and re-using bricks, setts or decorative features) must be the highest priority; recycling (the reprocessing of waste into a new product) next; with recycling as aggregate a last resort.
- 4.8.3 The Plan at present contains no policy on re-using material, only on the lower priority of recycling.

4.9 Policy NC1: Principles Guiding the Development of Strategic Housing Sites

The following amendments are proposed:

Policy NC1

Amend NC1(a) to read “enable delivery of an attractive, locally distinctive neighbourhood vision, with high quality sustainable and inclusive design at its core, that respects and capitalises upon its historic environment and fosters a sense of ownership and belonging”;

Append to paragraph 1.5: “whose members feel at home and personally invested in their neighbourhoods”;

Insert new paragraph after 4.4: “The character and identity of each neighbourhood is important to the sense of belonging that everyone needs to feel at home in their community. This is informed by many factors, including the historic environment.”

See also proposed new policy for a positive strategy for heritage.

- 4.9.1 The historic environment both defines the character and identity of the city and expresses its great diversity. It underpins the city’s cultural life and creativity, and is a rich educational resource for all ages. It enhances mental health and general wellbeing: even living close to historic places is associated with better health¹⁷.
- 4.9.2 Policy NC1 outlines principles for the development of strategic housing sites. The Plan also sets out a positive approach to heritage, which should be reflected in this policy.
- 4.9.3 Paragraphs 1.5-1.7 of Part 2 call for new homes, communities and employment opportunities that work well, an inclusive economy and climate resilience, while 4.1 promotes excellent access to local services, open spaces and centres. The Plan should also ensure that people have a sense of belonging and feel at home in

¹⁶ See DEFRA’s guidance at <https://www.gov.uk/government/publications/guidance-on-applying-the-waste-hierarchy>.

¹⁷ Source: Historic England, Heritage and Society 2020 (and related publications), available at <https://historicengland.org.uk/research/heritage-counts/heritage-and-society/>

neighbourhoods for which they feel ownership and responsibility. This is essential to health, well-being and community cohesion, creating the confidence and sense of permanence that underpins the local economy.

4.10 NC2: Development in the Residential Zones

The following amendments are proposed:

Policy NC2

Append “In Residential Zones traditional manufacturing by small businesses in buildings historically occupied by such businesses will be an acceptable use.”

4.10.1 Small-scale businesses that carry on traditional manufacturing add variety and vitality to a neighbourhood, providing employment and attracting customers. Existing businesses should be protected from pressure to relocate as the residential population changes or increases.

4.11 NC17: Development in the Hospital Zones

The following amendments are proposed:

Policy NC17

Append to 4.57 “Developments will still be expected to comply with other policies within the Plan.”

4.11.1 Hospitals are absolutely necessary and indispensable and it is of central importance that sufficient provision is made. This policy and its supporting text are, quite rightly, robust.

4.11.2 Sheffield’s hospital sites incorporate heritage assets, and at the Northern General Hospital some of these have already been lost or are at risk. It needs to be clear that while hospital provision should not be impeded, developments are expected to conserve and re-use heritage assets and give proper consideration to alternatives to loss. This could be achieved through a reminder that the strong support remains subject to other policies in the Plan.

4.12 Policy CO3: Broadband and Telecommunications

The following amendment is proposed:

Policy CO3

Amend CO3(b) to read “the equipment is appropriately located, designed, coloured and landscaped to take account of its setting and there is no adverse impact on visual amenity or the significance of heritage assets”.

4.12.1 Policy CO3 calls for equipment to take account of its setting and have no adverse impact on visual amenity. It should also oblige installers to consider different locations and give special emphasis to the need to protect heritage assets from visual intrusion.

4.13 Policy GS3: Landscape Character

The following amendments are proposed:

Policy GS3 supporting text

Amend the final sentence of paragraph 8.12 GS3(a) to read “the city’s industrial heritage” with “the city’s heritage of industrial, agricultural and other historic uses.”

See also amendments to BG1.

4.13.1 The Plan is right to recognise the special role of industry in shaping the city’s landscape, but should also recognise other important historical influences.

4.14 Policy GS5: Development and Biodiversity

Policy GS6: Biodiversity Net Gain

Policy GS9: Managing Flood Risk

Policy GS10: Protection and Enhancement of Water Resources

Policy GS11: Sustainable Drainage Systems

The following amendments are proposed:

Policy GS5

Append “while conserving historic waterways and waterpower infrastructure, and their settings.”

Policy GS6

Append “BNG will not be applied so as to harm the significance of heritage assets, including historic waterpower infrastructure. In particular, the destruction of weirs will not be permitted in order to achieve BNG.”

Policy GS9

Amend GS9(d) to read “enables the removal of any existing culverts and structures over watercourses (excluding heritage assets) wherever practicable and compatible with other Plan objectives”;

Amend paragraph 8.32 to read: “Many of the measures required by the policy have dual benefits in terms of reducing flood risk and enhancing biodiversity. For example, removing some non-historic canalised sections of watercourse may make them more attractive to wildlife, slow the rate of flow and increase the channel capacity. It should be noted that historic artificial channels and ponds, especially those associated with waterpower are heritage assets, and many also provide valuable habitat.”

Clarify how areas of Land Safeguarded for Flood Storage will be used including any structures to be built. Protect all such areas from any construction that negatively impacts their heritage, recreational or scenic value.

Provide a definitive list of areas of Land Safeguarded for Flood Storage, include such areas the Site Allocations, and complete an assessment of their potential impact (including to heritage).

Policy GS10

Append “Development will be expected to conserve heritage assets, including historic waterpower infrastructure.”

Policy GS11

Append “Development will be expected to conserve heritage assets, including historic waterpower infrastructure. In particular, it will not be permitted to raise historic dam or channel levels as part of any drainage scheme. Consideration may be given to re-opening lost or blocked channels to assist with water management.”

See also amendments to BG1.

- 4.14.1 The Council declared a Biodiversity Emergency in May 2021, and a Climate Emergency in 2019, and the Plan reflects this strongly.
- 4.14.2 It is vital that policies intended to improve biodiversity and respond to the impact of climate change also conserve historic waterways and waterpower infrastructure, and their settings, and not harm their significance by de-canalisation, naturalisation or use as storage, or by the destruction of weirs.
- 4.14.3 The Sheffield Waterways Strategy¹⁸ states that more must be done to celebrate the city’s heritage, including the globally significant mills, works, weirs and goits. It describes river valleys and their complex system of man-made infrastructure as a globally important place, worthy UNESCO World Heritage Site status. Policy D1 includes structures associated with water-powered industries as distinctive to Sheffield’s heritage. Developments affecting waterpower remains should prioritise their value as heritage assets. Leisure, biodiversity or flood mitigation use should not compromise their historic and architectural significance.
- 4.14.4 Waterways and waterpower remains are particularly vulnerable to wear and neglect through the action of water. They rarely benefit from scheduled maintenance outside of restoration schemes. The underground archaeology of waterpower is also of great importance and at significant risk.
- 4.14.5 It has proved possible to accommodate heritage, biodiversity and climate change adaptation objectives. Modern culverts which create the greatest restrictions may be removed where compatible with conservation and biodiversity. Local examples of enabling appropriate fish migration without destruction of weirs, which also disrupts the richly biodiverse habitat of related goits, embanked rivers channels and dams.
- 4.14.6 Policies GS5 and GS6 are intended to increase biodiversity, but could encourage the needless destruction of heritage assets such as historic weirs. This was proposed at Storrs Bridge, even though an insuperable barrier (a reservoir) exists upstream.
- 4.14.7 Policy GS9 is intended to ensure that development does not increase the risk and frequency of flooding, already greater owing to climate change. This could encourage developers to eliminate or alter parts of the city’s historic waterpower infrastructure. The recent Loxley Valley Township scheme proposed very destructive measures for a historic dam and watercourses.
- 4.14.8 Paragraph 8.32 calls for canalised sections of watercourses to be removed. This could be used to justify destruction of waterpower infrastructure, which includes many artificial channels and rivers effectively canalised by masonry banks dating back 200 years or more.

¹⁸ Available at <https://www.sheffield.gov.uk/planning-development/sheffield-waterways-strategy>.

- 4.14.9 Previous proposals for flood storage areas have involved the creation of containment structures. Some areas identified on the Policy Maps are of heritage, recreational and scenic value and construction of this sort would be inappropriate and damaging. In particular the area in the Rivelin valley contains the sites of the historic Roscoe Wheel and New Dam, and that in the Porter Valley the Nether Spurgear, Holme and Endcliffe Wheels should be protected from this.
- 4.14.10 There is no list of areas of Land Safeguarded for Flood Storage. This should be provided to allow for a proper assessment of their suitability and impact, and safeguarded areas described fully with other Site Allocations.
- 4.14.11 Policy GS10 requires development to conserve and enhance the natural geomorphology of watercourses. Conservation is welcome in principle, but it must not prioritise a return to a “natural” state at the expense of the internationally important industrial heritage of Sheffield’s river system much of which is not natural.
- 4.14.12 Policy GS11 requires the use of on-site Sustainable Drainage Systems. There is a substantial risk that this will be used as justification to make significant changes to historic waterpower infrastructure to provide on-site storage, for example by raising dam levels, as was proposed for Loxley Valley Township.

4.15 Policy GS7: Trees, Woodland and Hedgerows

The following amendments are proposed:

Policy GS7

Amend the first sentence of paragraph 8.27 to read “Sheffield’s trees, woodlands and hedgerows are an important part of the city’s green infrastructure and character, and many are also important as heritage assets.”

See also amendments to BG1.

- 4.15.1 Sheffield’s trees, woodlands and hedgerows are often the product of historic industrial practices, such as coppicing and charcoal production. Some recall historic agricultural methods or enclosure in parks or chases. Trees may also have been planted for memorial purposes. It is important that these green assets are also valued as heritage assets.

4.16 Policy GS8: Safeguarding Geodiversity

The following amendments are proposed:

Policy GS8

Amend GS8(a) to (d) to read:

- (a) protect rock outcrops and other landscape features that are of geological or historical significance, especially where associated with the city's industrial heritage or character; and
- (b) provide opportunities to record features of geological or historical significance that would be unavoidably lost or damaged; and
- (c) ensure features of geological or historical significance are maintained through appropriate conservation management; and
- (d) provide on-site information boards where rock exposures and features of geological or historical significance are located and retained within a scheme."

Insert the following additional paragraph after 8.29:

"Sheffield's pre-eminence in the metal trades stems from local geology. Heritage assets related to mineral extraction are of great historic importance, but sometimes only traces remain on or under the ground, and these are especially at risk and easily erased completely. Remains of the refractory industry are particularly rare, with very few heritage assets designated nationally."

See also amendments to BG1.

- 4.16.1 Sheffield's pre-eminence in the metal trades stems from locally-available natural resources, ganister and fireclay in particular. Refractory products have been critical in producing high-quality and specialist steels, beginning with the crucible process, and local refractory production has dominated national output. The region's long tradition of coal mining has contributed to economic success and shaped communities. Local buildings, including some of the most historically important in the city, are very often built of locally-quarried stone, so that the built environment directly reflects the land on which it is built.
- 4.16.2 This makes heritage assets related to mineral extraction, including buildings, structures, landforms, transport routes and underground archaeology, of great historic importance.

4.17 Policy DE1: Local Context and Development Character

The following amendments are proposed:

Policy DE1

Append "Development proposals will be expected to conform with the Council's design guidance for the site, including the Urban Design Compendium".

Supporting text

Add the following paragraph: "Benchmarks and parameters for the City Centre and for other Sub-Areas as needed will be defined in an updated Urban Design Compendium, which will be adopted as a Supplementary Planning Document."

4.17.1 The Urban Design Compendium was produced in 2004 and included very detailed characterisations of all parts of the city centre along with design guidance. Although it was never adopted as Supplementary Planning Guidance, it has proved valuable as a reference. An updated version would be a move toward more the more complete design guidance advocated by the National Design Guide.

4.18 Policy DE2: Design and Alteration of Buildings

The following amendments are proposed:

Policy DE2

Add paragraph (s), to read “Upward extensions will be required to be appropriate and of high quality, preferring the form, style and materials of the host building”;

Add paragraph (t), to read “The quality of approved schemes should not be diluted, whether through condition discharge applications, Non-Material Amendments, or new planning applications”;

Append “Proposals are required to be buildable, and applications must include sufficient detail to demonstrate this.”

4.18.1 Some buildings in Sheffield have been harmed by poor-quality extensions of no merit. Permitted Development Rights exist for upward extensions to dwellings only so long as they use the same materials as the host building, and to non-domestic properties subject to prior approval of their appearance. The planning system should not provide a means to reduce quality or longevity compared with PDR.

4.18.2 NPPF paragraph 135 states that the quality of approved schemes should not be diluted. This is especially true where the approved scheme entails harm to a heritage asset.

4.18.3 There have been recent examples of applications approved which subsequently turned out not to be buildable, or to have foreseeable design defects. No application should be granted without certainty that it can be built to the approved design.

4.19 Policy DE6: Design of Tall Buildings and Protection of Views in the City Centre

The following amendments are proposed:

Policy DE6

Identify Tall Building Areas and Landmark Buildings on the Policies Map.

4.19.1 Policy DE6 refers to Tall Building Areas and Landmark Buildings being defined on the Policies Map, but they are not.

4.20 Policy DE8: Public Art

The following amendments are proposed:

Policy DE8

Append the following:

“Existing public artworks should be protected:

- (d) Proposals will be expected to retain existing artworks visible to the public in situ. Where this is not possible, proposals should include a firm plan for their reinstatement, preferably within the site or if necessary at a new location. Relocation of an artwork will be secured by condition;
- (e) If the nature of the development makes the loss of an artwork visible to the public unavoidable, the proposal will be expected to provide for a replacement of the same or higher quality and distinctiveness;
- (f) Proposals affecting statues and other commemorative objects will be decided according to national policy;
- (g) Historic England’s guidance on contested heritage will be followed where it is relevant;
- (h) The Council will identify a city centre location for the Crimean Monument and reinstate it there.”

Amend paragraph 9.20 to read: “Where public art is a condition of development, there may be certain circumstances where that condition may be discharged through a legal agreement; however, finance in lieu of public art will only be allowed as a last resort where the provision of new public art is not feasible.”

- 4.20.1 Policy DE8 recognises the importance of public art and strongly encourages new public art in development, but does not directly address public art that already exists. Some artworks are heritage assets, but this may not be so for newer works. An individual artwork may contribute to the significance of a structure to which it is attached, but loss or change may not be considered so harmful that a proposal is changed or refused. Some buildings are important primarily because of their artwork, but have little protection.
- 4.20.2 Developers are sometimes allowed make a financial contribution in lieu of public art, with money from several schemes pooled. This results in fewer, less site-specific artworks, and buildings of less distinction.
- 4.20.3 Recent changes to the NPPF and Permitted Development Rights have created specific protection for statues and other commemorative objects, and the Plan needs to take this into account.
- 4.20.4 The Race Equality Commission report and the Council’s own work on contested heritage show the need for a consistent sensitivity and awareness of the issues surrounding some artworks. Historic England have created guidance relating to this.
- 4.20.5 In some cases, public artworks have been removed with no clear plan as to how they will be reinstated, the Crimean Monument being a longstanding example¹⁹.

¹⁹ Decision of the Government Office for Yorkshire and the Humber, 4th February 2002, planning application 03/03910/LBC.

4.21 Policy DE9: Development and Heritage Assets

The following amendments are proposed:

Policy DE9

Insert the following after the first paragraph: “To further identify heritage assets of particular importance to the city, and in accordance with its statutory duty, the Council will designate new Conservation Areas in Castlegate and other areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance. The Council will also create, maintain and expand a Local Heritage List of non-designated heritage assets of local (or greater) significance (see Local Heritage List policy).”

Amend DE9(d) to read: “pay special attention to the desirability of preserving or enhancing the character or appearance of Conservation Areas, with particular regard for the special architectural or historic interest for which they are designated”;

Add paragraph (i) to read “accompanied by a satisfactory Heritage Statement”;

Replace the final paragraph with the following:

“Development that would harm the significance of a heritage asset will be permitted only where this is clearly justified and outweighed by other public benefits of the proposal.

“Harm to the significance of a designated heritage asset will be permitted only in exceptional cases where the public benefit of the proposal is sufficient to overcome the strong presumption in law against harm²⁰, and where there is evidence of a suitably rigorous assessment of potential alternatives²¹.

“In assessing the public benefit of a proposal the loss of economic, environmental and social benefits created by the historic environment will be taken into account.”

“Where harm to a heritage asset cannot be avoided, and no feasible alternative is found, proposals are expected to provide satisfactory mitigation that compensate for the harm.”

Paragraph 11.7

Add “A Heritage Statement (see policy DE9)”.

Supporting text

Insert supporting text on the importance and benefits of heritage (see 4.2; unless used elsewhere).

New policies are also proposed regarding the Local Heritage List, Public Houses, Culture and Diversity. In the absence of these, alternative provisions need to be added to DE9.

4.21.1 The Council is under a statutory duty to determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and to designate those areas as Conservation Areas²². The Castlegate Area has previously been identified as such an area²³ and should be designated without delay; its absence from the Plan could mislead developers. Other areas, including Areas of Special Character, may also merit designation and the Plan should provide for this.

²⁰ South Lakeland District Council v Secretary of State for the Environment and another [1992] 1 ALL ER 573.

²¹ The Forge Field Society & Ors, R (On the Application Of) v Sevenoaks District Council [2014] EWHC 1895 (Admin) (12 June 2014), paragraph 61.

²² Planning (Listed Buildings and Conservation Areas) 1990, s69(1).

²³ Sheffield City Council, “This is Sheffield – Our City Centre Plan 2018-28” (2018), p64.

- 4.21.2 Areas of Special Character defined in the Unitary Development Plan but not designated as Conservation Areas are non-designated heritage assets. Their addition to the Local Heritage List and future assessment is proposed under a new policy covering the Local Heritage List.
- 4.21.3 Policy on Conservation Areas should use the wording of the statute²⁴, as the policy on Listed Buildings does.
- 4.21.4 Harm is defined as the failure to preserve (or enhance, in the case of a Conservation Area) the significance of a heritage asset²⁵. Although harm can sometimes be justified in terms of public benefit, the Plan should make clear the exacting standard required.
- 4.21.5 In law, all harm to a designated heritage asset is exceptional²⁶, and there is a strong presumption against granting permission for any harm. Although the NPPF only uses the term “exceptional” with respect to “substantial harm”, it applies to all designated assets and to harm in any degree, even the smallest.
- 4.21.6 To justify harm to a designated heritage requires a rigorous assessment of potential alternatives²⁷, so that for any degree of harm it must be shown that the harm is necessary to achieve the claimed public benefit.
- 4.21.7 Harm can only be outweighed by public benefit that is powerful enough to overcome the strong statutory presumption against harm, and decisions must demonstrate that this presumption has been applied²⁸. Where there is harm and public benefit is absent, temporary or negligible, permission cannot be granted.
- 4.21.8 NPPF paragraph 195 creates a duty to avoid or minimise any conflict between an asset’s conservation and any aspect of a proposal.
- 4.21.9 All proposals will be expected to avoid harm to heritage assets or their settings as far as possible. Where harm may result to non-designated assets, developers are expected to show that they have considered alternative less harmful options and give reasons for not implementing these; and for harm to designated assets, they will be required to do so.
- 4.21.10 The historic environment makes a proven positive contribution to economic, environmental and social sustainability, and the heritage sector itself forms a significant component of the economy. These are public benefits that are often cited as justification for doing harm to the historic environment. The Plan should make clear that in addition to the desirability of preserving the historic environment, the loss of its other benefits will have weight in determining overall public benefit.
- 4.21.11 Photographic and documentary recording of any losses and maintenance or restoration of retained structures are basic expectations and on their own not mitigation. Satisfactory mitigation might include a development of outstanding architectural interest or a financial contribution toward the restoration of at-risk heritage outside the proposal site.
- 4.21.12 Heritage Statements must be provided with planning applications that are likely to affect listed buildings, conservation areas, registered parks and gardens, scheduled monuments and non-designated heritage assets including non-designated archaeological sites and historic buildings. Applications without satisfactory statements should not be validated.
- 4.21.13 Heritage Statements should be prepared following Historic England guidance²⁹, especially the requirement that it is “an impartial analysis of significance and the contribution of setting ... not an advocacy document, seeking to justify a scheme which has already been designed”.

²⁴ Planning (Listed Buildings and Conservation Areas) 1990, s72(1).

²⁵ South Lakeland District Council v Secretary of State & ano [1992] 1 All ER 573.

²⁶ Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council & Ors [2014] EWCA Civ 137 [20]

²⁷ The Forge Field Society & Ors, R (On the Application Of) v Sevenoaks District Council [2014] EWHC 1895 (Admin) [61]

²⁸ *Ibid* [49]

²⁹ Historic England Advice Note 12 Statements of Heritage Significance, <https://historicengland.org.uk/images-books/publications/statements-heritage-significance-advice-note-12/>.

- 4.21.14 Applicants should also be expected to make reasonable efforts to discover whether anything affected by their proposal is a non-designated heritage asset, even where not previously identified.
- 4.21.15 This policy would benefit from additional supporting text on the importance and benefits of heritage as outlined in 4.2, unless this has been included in the proposed new policy for a Positive strategy for heritage 4.1 or elsewhere.

4.22 New policy: Local Heritage List

Local Heritage List

A policy is needed relating to the Local Heritage List and its ongoing expansion.

The policy should contain the following:

- (a) The Council will maintain a list of non-designated heritage assets, known as the “Local Heritage List” which it considers to be of local (or greater) significance, including (but not limited to) buildings and other structures; parks, gardens and designed landscapes; landmarks, artworks and wayfinders; archaeological sites; places with historic connections; and areas or collections of assets connected by geography or significance;
- (b) The objectives of maintaining the Local Heritage List are to raise awareness and foster appreciation of those assets; sustain or enhance their significance; and protect them and their settings;
- (c) Developers will be expected to retain, preserve, protect, safeguard and, where desirable, enhance assets on the Local Heritage List and their settings, and proposals entailing their harm to them or their settings will be resisted;
- (d) The Council will seek to keep the Local Heritage List up to date with input from local people, groups and national amenity societies. In addition, during the execution of its planning functions, the Council may also identify non-designated heritage assets that are not on the Local Heritage List but which appear to meet the criteria, and these will be given the same consideration as assets on the list;
- (e) All Areas of Special Character defined in the Unitary Development Plan are provisionally included in the Local Heritage List with asset type Area until either designated as Conservation Areas, or reviewed by the assessment panel and either added permanently to the list or removed;
- (f) Nothing in this policy adversely affects the protection afforded other non-designated heritage assets;
- (g) Progress on the Local Heritage List should be monitored via an annual report of change in the number of locally listed heritage assets.

Paragraph 12.2 should be amended to include the annual report.

See also proposed new policy on Diversity.

- 4.22.1 Local heritage creates distinctiveness and character, making an important contribution to a sense of place and belonging, attracting residents, visitors and investors and contributing substantially to economic sustainability and positive perception.
- 4.22.2 Local Heritage Listing is essentially community-led, so local people get involved with, understand and celebrate the heritage of their area. Engagement with the historic environment boosts health and well-being, and serves the NHS’s Five Ways to Wellbeing.

- 4.22.3 There is particular value in identifying and protecting local heritage assets in areas with relatively few designated assets, and of expanding the diversity in identified heritage assets.
- 4.22.4 Identifying local heritage assets ahead of development proposals helps to reveal concerns prior to the planning process, assisting Council awareness at an early stage and guiding development management.
- 4.22.5 The Local Heritage List will always be a work in progress and it is therefore essential that heritage assets can be identified during the planning process, which is often when their significance is first examined. Such an approach has been adopted elsewhere, for example in Lambeth³⁰.
- 4.22.6 Areas of Special Character are defined in the Unitary Development Plan. The architectural and historic quality of these areas makes them worthy of assessment for designation as Conservation Areas. Some have been so designated, and the remainder are non-designated heritage assets. The ASCs identified in the UDP but not yet designated are listed in Appendix C.

4.23 New policy: Public Houses

Public Houses

A policy is needed that explicitly protects the social and historic importance of public houses.

It is proposed that a policy similar to policy ED9 of the Lambeth Plan³¹ be adopted.

- 4.23.1 Public houses contribute to employment, the local economy, neighbourhood vitality and supporting social sustainability. They include both commercial and social enterprises of value to the local community.
- 4.23.2 In Sheffield, public houses are also of particular historical importance as a vital facility to workers in the hot and dusty local industries. Many are heritage assets in their own right, and contribute to the character and identity of an area. This is equally true of places with a similar function such as Working Men's Clubs.
- 4.23.3 Policies are needed that explicitly resist the loss of public houses and similar institutions, set a clear standard that must be met before changes of use or redevelopment, and ensure that premises can readily be returned to their previous or historic use. Similar policies have been adopted by other planning authorities.

³⁰ Lambeth Plan policy paragraph 10.110, available at <https://beta.lambeth.gov.uk/planning-building-control/planning-policy-guidance/lambeth-local-plan-2021>.

³¹ Lambeth Plan policy ED9 p104, available at <https://beta.lambeth.gov.uk/planning-building-control/planning-policy-guidance/lambeth-local-plan-2021>.

4.24 New policy: Culture

Culture

A policy is needed to promote cultural and creative activity, including provisions such as:

- (a) Requiring proposals to consider their potential impact on cultural and creative activity and encourage their promotion;
- (b) Encouraging the provision of formal and informal spaces on a variety of scales for events, including performances and exhibitions;
- (c) Encouraging the provision of flexible and affordable workspaces and retail outlets for creative industries;
- (d) Supporting proposals for cultural facilities including learning institutions, theatres in underserved areas or near existing assets such as the City Hall, Events Central in Fargate, the proposed Music Hub at Canada House, Abbeydale Picture House, Nether Edge theatres and smaller grassroots venues;
- (e) Requiring proposals to take into account the attractiveness of historic buildings to cultural and creative businesses.

- 4.24.1 Culture and creativity are central to human activity and identity, and essential to people's well-being. Cultural and creative activity in the community and non-profit sectors greatly enrich the life of the city, making it a more desirable place to live and work as well as to visit. They are economically important: in 2020, arts and culture in England contributed over £11bn GVA. Like heritage, they bring additional economic benefits by stimulating spending by visitors and influencing business location decisions.
- 4.24.2 The need for access to cultural buildings is mentioned in the supporting text for policy NC11 (paragraph 4.39). Policy VC2 controls uses in Cultural Zones, but only two such zones are identified, and they do not include all major venues in the city centre, nor any outside it.
- 4.24.3 The cultural benefits of heritage assets and public art are mentioned briefly in Part 9 – A Well-Designed City. Historic buildings are particularly attractive to cultural and creative businesses, and are an important resource for the cultural economy.
- 4.24.4 The Council takes a positive view of culture and creativity, and has adopted a Culture Strategy³². The Plan needs to complement this.

³² Decision of the Economic Development and Skills Policy Committee, 7th September 2022, see <https://democracy.sheffield.gov.uk/mgAi.aspx?ID=28195>.

4.25 New policy: Diversity

Diversity

A policy is needed relating to impact of development on diverse communities. This will have a wide scope in which heritage is one of many considerations. With respect to heritage, provisions should include:

- (a) Proposals should be required to take into account their impact on the diversity of heritage, especially underrepresented heritage, communal significance, local rarity, places and multiple significance;
- (b) In assessing significance of a heritage asset, special consideration should be given to whether that significance is related to a person's race, religion, gender, sexuality, class, or other identity;
- (c) Consideration should also be given to whether assets with a particular significance are rare in the locality, even though they may exist in other areas of city.

See also proposed new policy for the Local Heritage List.

- 4.25.1 Sheffield is an extremely diverse city in terms of race, religion, gender, sexuality, class and other characteristics. Respecting diversity is an essential factor in social sustainability, and so is a matter for the Local Plan, in addition to other Council strategies. Policy NC5 requires a mix of housing types as a means to creating mixed communities, but little else in the Plan addresses diversity.
- 4.25.2 The report of the Race Equality Commission set up by the Council highlights the importance of pro-actively addressing the impact of proposals on minoritised or underserved populations. Although the feedback in this document focuses on heritage impact, the impact on diversity of all policies must not be neglected.
- 4.25.3 A diverse society has a diversity of heritage, which when acknowledged and celebrated gives everyone in the city a feeling of belonging, and fosters understanding within and between communities. This requires a sensitive approach to considering heritage significance. Recognised physical heritage assets are concentrated in some areas and relatively sparse in others. Significance may be associated with place rather than with specific structures. Communal significance may be as important as architectural or aesthetic quality. Recognised historic places may have multiple significance once diversity is considered.

4.26 Part 2 paragraph 11.19 Use of Public Land and Resources

The following amendments are proposed:

Paragraph 11.9

Amend the second sentence to read "This could be through land sales and development promotion or through the protection and improvement of environmental and heritage assets."

- 4.26.1 The Council's extensive public landholdings include many heritage assets. There is significant potential to promote the strategy by protect and improving these.
- 4.26.2 The Council also has statutory duties regarding the protection and enhancement of designated heritage assets, in particular in its disposition of land³³. Where appropriate, the Council should co-operate with developers to facilitate the protection of heritage assets.

³³ Planning (Listed Buildings and Conservation Areas) Act 1990 s66(2) and s72(1).

Appendix A: Corrections

This is a list of typographical and minor factual errors and issues of legibility which need to be corrected to make the Plan as accurate and legible as possible.

Maps

- Policy Maps need to show coinciding boundaries clearly. At present they are hard to interpret online, because coinciding boundaries may not be readily visible.
- Sub-Area sketch maps should include reference points. The absence of these makes them hard to relate to other policy maps.
- Extracted Priority Location and Catalyst Site maps need to be larger and higher definition to aid legibility.

Part 1

- P28, P30 City Centre stated as including Kelham Island, but Map 3 on p30 excludes it. These need to be aligned.
- P36 Correct spelling of neighbourhood name to "Cathedral".
- P37:
 - Add map showing neighbourhoods;
 - Add that part of the Character Area lies within the Kelham Island Conservation Area. This is mentioned for the Priority Location and Catalyst Site, but for consistency with other sections should be mentioned for the area as a whole.
- P41 Cannon Brewery is not a Listed Building, so Policy CA1B(c) should read "and nearby heritage assets including Cornish Works, Globe Works and Cannon Brewery".
- p42:
 - Add map showing neighbourhoods;
 - 4.19:
 - "The area is dominated by busy roads" does not apply to all the items listed;
 - Castlegate is now pedestrianised, so it is not clear what is meant by "Castlegate to the north, which restricts movement towards the Wicker Arches";
 - "Wicker high street" should be just "Wicker" (its official name) or "the Wicker" (how it is referred to locally);
 - The railway line is in active use, so omit "redundant".
- p48:
 - Add map showing neighbourhoods;
 - The area includes the City Centre Conservation Area and a small part of Hanover Conservation Area in addition to Furnace Hill and Well Meadow.
- P54:
 - Map (top left) includes Character Area 5 in a different shade, which should be omitted;
 - Map (top right) includes redundant outline of the area, and map of neighbourhoods is too small to be useful;
 - 4.35 Park Hill Flats are Grade II*;
 - Add that part of the area lies within the Cultural Industries Quarter Conservation Area.
- P58:
 - Map top left: add outlines of Priority Locations and Catalyst Sites, for consistency with other areas;
 - Map top right: enlarge, currently too small to be usefully legible.
- P63: Describe Catalyst Site as "Moorfoot". The current description "Junction between St. Mary's Gateway, The Moor Street, and London Road" is incorrect. There is no succinct description using street names.
- P65:
 - Map top right: enlarge, currently too small to be usefully legible;

- Add the part of the Character Area lies within the John Street Conservation Area. This is mentioned in the policy, but for consistency with other sections should be mentioned in the supporting text.
- P69 SA2: Correct spelling to “Worrall”.
- p80 6.8 “Winter Garden” rather than “Gardens”. The former is its official name.
- P111-112 D1: paragraph numbering restarts from (a), so that (a) and (b) appear twice. This occurs in some other policies as well.

Part 2

- P9 2.10
 - Replace “permitted in principle” with “acceptable in principle”, as the former has a technical meaning that is not intended here, and the latter is the term used in the following sentence;
 - Amend last sentence to read “So, if a use is described as being ‘preferred’ or ‘acceptable’ it does not mean that a planning application for that use must always be approved.”
- P15 ES2 (a), (b), (c), (e) and (f): the words “impact” or “impacts” are redundant as “impact” is used in the governing paragraph.
- P38 NC5 (c): replace “will be not be” with “will not be”.
- P84 6.8 Replace “The Cultural Zones” with “The central Cultural Zone”.
- P96 GS1: All items are negative linked by “or” except (c) and (f) which are positive, which is open to an interpretation different to the one intended. For an unambiguous reading:
 - Use “or” after (a)(i) and (a)(ii); then
 - Either omit “or” in every other case;
 - Or replace “or” with “and” in every other case, and “and” between (a)(iii) and (b).
- P113-114 GS9: paragraph numbering restarts from (a), so that (a) to (f) appear twice. This occurs in some other policies as well.
- P129 DE6: Neither Tall Building Areas nor Landmark Buildings are defined on the Policies Map.
- P130 DE7 (h): should probably read "do not impede movements". For clarity, this item should be divided into two:
 - do not create impede movements on key active travel routes; and
 - do not cause risks to highway safety or create hazards for disabled people, pedestrians or cyclists.

Glossary

- Add definitions of the terms “Priority Location” and “Catalyst Site”.

Appendix B: categories of particular historical importance to Sheffield's distinctive heritage.

Categories in draft policy D1:

- (a) Water-powered industries;
- (b) The metal trades and their supporting industries;
- (c) Non-conformism;
- (d) Sheffield Board schools;
- (e) The Central Sub-Area including the historic street pattern;
- (f) Victorian, Edwardian and Garden City-style suburbs;
- (g) The city's post-war built heritage;
- (h) Historic village centres and farmsteads;
- (i) The city's rural setting, topology and landscapes;
- (j) Historic parks, gardens and cemeteries.

Proposed additions to policy D1:

- (k) Public housing developments, especially where innovative or experimental;
- (l) The Blitz and its aftermath;
- (m) The Great Sheffield Flood of 1864;
- (n) Mineral extraction, processing and manufacture, especially the refractory industry;
- (o) Public houses and brewing;
- (p) Football and other sports in which the city has been a leader;
- (q) Popular music, especially of the later 20th century;
- (r) Worker organisation and activism, including the Sheffield Outrages;
- (s) Radicalism and social reform, including (but not limited to) the Chartists, women's suffrage, the slave trade, the Corn Laws, the Poor Law and access to land;
- (t) Vernacular buildings typical of the area;
- (u) Designed landscapes and streetscapes, especially those of Robert Marnock;
- (v) Historic transport route patterns, including packhorse routes and turnpike roads;
- (w) The imprisonment of Mary Queen of Scots;
- (x) Historic uses by major landowners, for example the deer park associated with Sheffield Manor or Rivelin Chase.
- (y) Other categories of particular historical importance in the city, as may be identified from time to time by the Local Planning Authority.

It is also proposed to amend category (i) to read "The city's rural setting and topography" so as to avoid duplicate of "landscapes" in the proposed amended policy wording.

Appendix C: Areas of Special Character

This is a list of Areas of Special Character not yet designated as Conservation Areas. Listed Parks do not have the same statutory protection as Conservation Areas, and should therefore be considered for designation.

- (a) Carr Road, Deepcar;
- (b) Hunshelf;
- (c) Wood Royd Road, Deepcar;
- (d) Carr Road, Walkley;
- (e) Crookes;
- (f) Dungworth;
- (g) Loxley Valley;
- (h) Onesacre;
- (i) Oughtibridge;
- (j) Roscoe Bank;
- (k) Stannington Village;
- (l) Steel Bank;
- (m) Town Head, Wadsley;
- (n) Woodland View;
- (o) Burncross Road, Chapeltown;
- (p) Mount Pleasant, Chapeltown;
- (q) Whitley and Wood End;
- (r) Wortley Road, Chapeltown;
- (s) Birley Carr;
- (t) Burngreave/Abbeyfield;
- (u) Flower Estate;
- (v) Attercliffe;
- (w) Handsworth Road;
- (x) Norfolk Park (Listed Park Grade II*);
- (y) Beighton;
- (z) Mosborough Village;
- (aa) Woodhouse;
- (bb) Albert Road, Heeley;
- (cc) Bradway;
- (dd) Totley Bents;
- (ee) Brocco Bank;
- (ff) Clarendon Park, Fulwood;
- (gg) Dore Road;
- (hh) Hanover (not included in Hanover Conservation Area);
- (ii) Mayfield Valley;
- (jj) Ringinglow;
- (kk) Botanical Gardens (Listed Park Grade II);
- (ll) Weston Park (Listed Park Grade II);
- (mm) Devonshire Green;
- (nn) Portobello.