Dear Mr Shepherd

Introduction

1. As you know, I have conducted a series of 7 Hearings and visited a good deal of the Borough. These visits have included 2 accompanied site inspections at Dinnington and Bassingthorpe Farm with Wentworth Woodhouse. I am now able to set out some preliminary thoughts on the Core Strategy and its examination so far. They should not be construed as final or all-embracing conclusions.

2. I regret to say that I am not convinced that, in its present form, the Core Strategy is sound. I therefore set out below the issues which I consider should be the subject of Main Modifications and which should be consulted upon in due course. I invite you to draft them for my consideration.

Housing numbers

3. The evidence refers to various estimates and targets for housing during the plan period, depending upon the base date and assumptions made. I have come to the view, however, that the 2008-based household projections provide the most realistic basis for the housing target. On its own, the outcome is a good deal fewer dwellings than the Regional Strategy (RS) target but, as you say, it closely aligns with the early results of the 2011 Census. A greater emphasis should, however, be placed upon the need to address the backlog. The backlog should be assessed according to the degree to which net housing completions have fallen short of the target set out in the development plan which was extant at the time.

4. From 2004/05 to 2012/13, this was the RS and RSD/14 Table 2 gives a total backlog during 2004/05 – 2011/12 of 3,738 dwellings to which should be added the 2012/13 deficit of 645 (1160-515). This total backlog of 4,383 dwellings equates to an annual provision of 292 dwellings, although the Council should aim to accommodate it within the first 5 years of the plan period. This change will have implications for the housing trajectory which should continue to include the 20% buffer to which the Framework refers. The total annual provision of 850 + 292 would bring it up to 1,142 annually, about the same as the RS annual requirement of 1160 dwellings which several participants advocate. It would better accord with the Government’s policy to boost significantly the supply of housing and provide for a greater choice of sites. An annual 100 or so windfall sites would augment the supply. These revised housing numbers should be the subject of a Main Modification, and I look forward to receiving your suggested draft of it.
**Phasing**

5. Policy CS3 seeks to prioritise the development of the most sustainable sites. This appears to me to be a phasing policy and, even though you consider that it would apply to no more than a **handful of sites**, I do not consider that it accords with the Framework. Development which is sustainable, it says, should go ahead without delay. The Sites and Policies DPD should identify sustainable sites in accordance with the strategy set out in the Core Strategy and the Council should encourage their suitable development straightaway. I therefore ask you to re-draft this Policy, taking my views on it as set out in Document ED/26.

**Commitment to co-operation**

6. It is unfortunate that the Strategic Housing Market Assessment (SHMA) relates only to Rotherham rather than to the entire housing market area and that this Assessment is of some age. But provided that the Core Strategy includes a commitment to continue to co-operate with relevant bodies, particularly Sheffield City Council, and to its early or immediate review, I do not think these shortcomings need be fatal. I would welcome your further thoughts on the prospect of such a review, including the date when it could be started, and would ask you to draft a Main Modification to ensure it. It could be based upon FC 147.

7. I understand that Sheffield City Council has decided to withdraw its Sites and Policies DPD and so it will not be submitted to the Secretary of State for examination. This withdrawal would appear to me to be a good opportunity for your Council, the City Council and any neighbouring authorities to co-operate in the preparation of a SHMA for the entire housing market area. I should appreciate your views on this, including any implications for the progress of the submitted Rotherham Core Strategy. In my judgement, however, it would be better to press on with the examination of your Core Strategy and the submission of my Report on it as soon as possible on the understanding that an early/immediate review will take place. Hence, unless you request otherwise, I shall continue to prepare my Report.

**Bassingthorpe Farm**

8. You consider that enough work has been undertaken on Bassingthorpe Farm for the Core Strategy to identify it as a strategic allocation rather than as a broad location for growth, as at present. I agree, and a Main Modification should provide for it. It would bring forward development by a year or so, and with it an earlier completion of about 125 dwellings. The housing trajectory should be modified accordingly.
Affordable homes

9. You have put forward proposed changes to Policy CS7 and its supporting text. I consider that they are of enough significance to warrant consultation upon them as a Main Modification.

Waverley

10. Waverley is identified as a Local Service Centre, yet it is proposed at present to take as much as about 17% of the Core Strategy’s housing requirement. This is substantially more than that proposed for other such centres, and it will include employment land and presumably a commensurate range of services. I consider that its importance in the strategy should be acknowledged by its inclusion as a Principal Settlement.

Conclusion

11. I hope that these, my present thoughts, are helpful. Please put this letter on the examination web-site. I look forward to your response which should also be placed upon the website. Arrangements will, of course, have to be made for public consultation on the proposed Main Modifications. In view also of the increased provision for housing, it may be necessary to undertake further sustainability appraisal.

12. This further appraisal should be undertaken while the Main Modifications are being drafted so that consultation on them and the publication of the sustainability appraisal can take place at the same time, demonstrating that the sustainability appraisal has suitably informed the Main Modifications.

Yours sincerely

Richard E Hollox

Inspector

6 January 2014