Rotherham Metropolitan Borough Council

Response to ED/24, ED/25, RMA/01 and ED/57

1. The Council has collectively considered those documents above which relate to proposed changes to Policy CS4. They are addressed in turn below.

ED 24 Matter 1 CS4 suggested change by Barton Wilmore

2. The Council has carefully considered the change suggested by Barton Wilmore to Focused Change 51 third paragraph. It has no over riding objection to the suggested change of the word limited to focused although we do not consider it adds any greater clarity to the Policy.

3. We do not support the inclusion of the words ‘including Local Centres’ as the existing wording of the proposed policy does not exclude these locations from consideration.

4. Not withstanding the above, if the Inspector is minded to accept the proposed change the reference should be to Local Service Centres, this is the terminology used within policy CS1.

ED25 Matter 1 CS4 HBF proposed changes to policy CS4 Green Belt

5. In the light of discussions during Matter 1 and subsequently Matter 3 the Council recognises the reasoning behind the changes proposed by the HBF to policy CS4. However the Council does not support the changes proposed by the HBF to policy CS4 for the following reasons.

6. As already indicated to the Inspector, the Council supports the identification of Bassingthorpe Farm as a Strategic Allocation. The Council does not support the identification of Dinnington East (or as suggested by the HBF, Dinnington West depending on the outcome of Hearing Matter 7) as a strategic site. The Council has clearly set out why it supports the strategic allocation of Bassingthorpe Farm and the evidence base that has been prepared to support this position. The Council considers that reference to a broad location for growth at Dinnington east is appropriate and indicates the level of uncertainty regarding the direction of growth, the site selection process to meet needs and the evidence base available to support a strategic allocation in this location.

7. The Council does not support the identification of changes to the Green Belt on the Key Diagram. In preparing its Core Strategy the Council considered how best to identify where changes to the Green Belt would be most likely made and gave consideration to being more prescriptive in this policy. However in considering potential sites for release from the Green Belt it is clear to the Council that there is no one specific direction from each of the settlement groupings where releases are proposed. It is also
important to note that a number of sites that are being considered would be too small to indicate on the Key Diagram and are more appropriately dealt with in the Sites and Policies Document and on the Policies Map to accompany this Document.

8. As already discussed in the Hearing to Matter 3 the Council has an annual target of 850 dwellings per annum and a backlog of 100 dwellings per annum to accommodate through the allocation of sites proposed to be developed throughout the Plan period to 2028. The Council acknowledges that at the time of adoption of the Core Strategy it is unlikely we will have a five year land supply. The Council has suggested that the outcomes from consultation on its Publication Sites and Policies Document will give greater confidence to the market on the Council’s preferred allocations at that time.

9. In the Hearing we suggested that, where justified, we will work with land owners, developers and their agents to progress planning applications for approval on adoption of the Sites and Policies Document. Mr Ward has already indicated that there are a number of the smaller preferred allocations currently within the Green Belt that could come forward immediately following adoption of the Sites and Policies Document, these small and medium sized sites will significantly meet the five year land supply.

10. The Council does not want to pre-judge the outcomes of the emerging Sites and Policies Document and the ongoing consultation and sustainability appraisal process. We refer to paragraph 14 of NPPF (NEB/1a) that states where the development plan is absent, silent or relevant policies are out-of-date, we should grant permission unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole;
- or specific policies in this Framework indicate development should be restricted. ⁹

11. Sub-note 9 on page 4 of NPPF list Green Belt as being amongst those areas where development should be restricted that is the “presumption in favour” does not apply in Green Belt.

Response to RMA01 CPRE Policy CS4

12. The Council has read the CPRE suggestions with interest and note that Focused Change 51 has not been included within Mr Wood’s response. It is unclear whether Mr Wood has had due regard to Focused Change 51 or if it is an oversight. The Council proposes to undertake a limited or focused review (if the wording is changed in response to ED24) in other locations, as necessary, to deliver the spatial growth strategy, established in CS1 and to ensure the long-term sustainability of all communities.
13. As drafted the Council cannot support Mr Wood’s suggested new Policy CS4 as it reaffirms the CPRE stance of a brownfield first policy. The Council feels it has demonstrated there is an insufficient supply of brownfield sites to meet its development needs. The Council has acknowledged that it cannot demonstrate a five year land supply without undertaking the Green Belt Review and adopting its emerging Sites and Policies Document. See response to ED25.

14. During Matter 1 the Council supported Bassingthorpe Farm as a strategic allocation within the Core Strategy this is reiterated in our response to ED25. If the Inspector accepts this change and suggests a Main Modification to the Core Strategy the Council then following adoption of the Core Strategy the Council will deal with any planning applications submitted.

15. The Council does not intend to deal with planning applications submitted for development on other sites prior to the completion of the comprehensive Green Belt Review and adoption of the Sites and Policies Document.

16. The Council appreciates that the wording in paragraph 2 of Mr Wood’s statement is a comprehensive assessment of the procedure for undertaking a Green Belt review that will guide the selection of development sites. However the Council is not convinced that this is required within the Policy. If the Inspector is minded to include some or all of this wording from this paragraph into Policy CS4 we would object to the reference to “the target for recycling previously developed land”.

17. For clarity the Council does not support any of the other suggested changes to Policy CS4.

Response to ED57 JVH Planning Consultants Ltd Policy CS4

18. The Council does not accept the detailed suggestions put forward by JVH Planning Consultants Ltd to amend policy CS4. It is considered that the policy as drafted with Focused Change 51 deals effectively with all likely permutations to a detailed Green Belt Review. The Council considers that in general its policy, as drafted, provides sufficient flexibility to give consideration to the review of Green Belt boundaries in appropriate and sustainable locations.