Matter 1: Requirements, Vision, Strategy, Objectives and Sustainability

Each of CPRE South Yorkshire’s written statements centre on four key elements of the Core Strategy that we do not consider to be sound and to be in need of substantive modification:

1. **Unmet housing need is not in itself a justification for taking land out of the Green Belt, and so there is not a convincing case for Green Belt changes;**

2. **The proposed phasing of new housing development is not strong or clear enough: it should very clearly focus development on the most sustainable locations;**

3. **The policies and targets for affordable housing are not achievable with the existing delivery mechanisms, and will result in affordable provision being too little and in the wrong places;**

4. **The Strategy is not positively prepared to deliver long-term sustainability, because new developments will not be adequately harnessed to recycle previously developed land and improve design quality, density and energy performance of the built environment.**

Our responses to the Inspector’s questions are all informed by these four concerns. We have not attempted to answer every question but instead focused on the questions where we believe our comments will be most pertinent to the Examination.

1.5

Rotherham Borough embraces substantial areas of countryside, and maintaining the character of the Borough therefore demands that new development be concentrated, as far as possible, within existing settlements and on previously developed land. The Green Belt exists to define the pattern of settlement, by maintaining space between settlements and focusing development within them. In particular CPRE advocates focusing development where it can improve sustainability, for example by increasing density around public transport nodes, supporting the viability of local amenities and facilitating green infrastructure.

1.6

In our view, the Core Strategy will not create this kind of focus, and therefore it will not enhance the sustainability and character of the Borough. Rather it appears to retrofit a spatial strategy onto a menu of potential development sites put forward by developers. We cannot criticise developers for wishing to maximise their investment returns, but merely to facilitate their doing so is not spatial planning. Spatial planning exists to correct for market failures, and the market consistently fails to address two key problems in housing: affordability and sustainability. The Core Strategy contains policies that aim to promote affordability and sustainability, but it does not contain workable mechanisms to implement
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Written Statement from CPRE South Yorkshire, submitted by A.Wood, representative ID 738593

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them. We suggest that the Core Strategy could be vastly improved in this regard by two changes:

• Much clearer and stronger phasing arrangements for development sites, that simply say, “the most sustainable sites will be released first”, restricting release of less sustainable sites while ever more sustainable sites are available, supported by good criteria for assessing the sustainability of windfall sites;

• Unequivocal policies that make design excellence, energy performance, provision of affordable homes and provision of local amenities clear pre-requisites for development, not bolt-on benefits that can be unbolted by negotiation.

Without these changes there is a high risk that the laudable vision of the Core Strategy will not be realised, because new developments will be dispersed, poorly connected to existing communities, providing insufficient affordable homes and inadequate contribution to sustainable development.

1.7

In our response to the draft Sites and Policies document we showed that the ‘5 years + 20%’ housing land supply requirement could be comfortably accommodated on the Waverley and Rotherham Urban Area (except Bassingthorpe Farm) sites; so in terms of land supply all other sites could be allocated to a later phase. There is no reason why this approach would not be fully compliant with NPPF. The only reason to put other sites, elsewhere in the Borough, into the first phase would be if this would create a demonstrably more sustainable outcome. RMBC has not demonstrated this, and therefore the large proposed supply of greenfield sites, without rigorous phasing, is wholly inappropriate.