**Representation from Save our Greenbelt to the Inspection of Rotherham’s Core Strategy**

**Tuesday 22 & Wednesday 23 October 2013**

**Introduction**

Save our Greenbelt (Rotherham Action Group) was formed in May 2009 by members of the Greasbrough and Rawmarsh communities with specific objectives:

- To ensure that Rotherham’s greenbelt land is protected and preserved for the benefit of Rotherham citizens and future generations and that it should not be unnecessarily diminished by any new housing targets
- To ensure RMBC policy for new housing targets reflects Rotherham’s actual need
- To ensure that RMBC’s housing targets are achieved by developments on brownfield land and improvements to existing properties before greenbelt land is utilised

**Responses to Matter 1.**

1.2 Sheffield and Rotherham have consulted on the need for more housing developments in Rotherham. In 2009 -2011 Sheffield paid considerable sums to Rotherham to promote the building in the borough as Sheffield refused to build on their own Greenbelt land. When this was discovered, Rotherham had to repay the money. This is not Rotherham acting as a ‘good neighbour’.

<table>
<thead>
<tr>
<th>Period</th>
<th>Capital</th>
<th>Revenue</th>
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<tr>
<td>2009/10</td>
<td>£750,000</td>
<td>£110,000</td>
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<tr>
<td>2010/11</td>
<td>£741,000</td>
<td>£81,000</td>
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“The above money would be ring fenced and as you can see it is not very much for sacrificing so much green belt land” Cllr Peter Thirlwell (email Sept 2009)

The implied need for so many housing developments in Rotherham and specifically on Greenbelt at Bassingthorpe is largely as a result of migration from Sheffield to Rotherham, rather than Rotherham’s own housing needs.

1.4 Should the plan be adopted, the timescale should be greatly extended and delayed to take account of current large scale developments e.g. Waverley, on the Sheffield/Rotherham border, building 2500 dwellings and smaller developments of 300 houses planned in the north of Rawmarsh, adjacent to a newly completed development of ‘The Wickets’ housing estate.

1.5 The strategy does not set out sufficiently the attraction of the area of Bassingthorpe as a visual amenity for the town, despite the final paragraph of Policy CS28 in the Focused Changes to the Core Strategy document produced by the council in January 2013 stating that “the design process shall take into account views and vistas to landmarks and skylines into and out of Rotherham Town Centre and across Rotherham to the surrounding countryside.” Much is made correctly in the Heritage Impact Assessment of the view from Wentworth Woodhouse, but little is made of the impact of the view from the town centre, which
currently looks out to farmland, and would look out to housing should Bassingthorpe be developed.

1.7 The Core Strategy does not take adequate account of the National Planning Policy Framework with regard to its commitments on Greenbelt which defines its aim as “being to prevent urban sprawl by keeping land permanently open; to assist in safeguarding the countryside from encroachment; and to assist in urban regeneration by encouraging the recycling of derelict and other urban land.”

Bassingthorpe farm has been described as being part of the “wider Rotherham Urban area” which implies it is adjacent to the town centre yet the council themselves in their Position Statement of June 2012 define it as “predominantly farmland/grazing land” with “a number of local wildlife site designations, ancient woodland and listed buildings.”

1.8 The Framework has not been positively prepared in that it seeks to impose large scale building in the Bassingthorpe area without sufficient regard for alternatives or for the impact that joining the village of Greasbrough, via Munsbrough, Rawmarsh and Parkgate to the town centre will have as urban sprawl. Rotherham proposed in its LDV in 2008:

**Policy ENV1 Green Belt**

“A Green Belt whose boundaries are defined on the Proposals Map will be applied within Rotherham Borough. In the Green Belt, development will not be permitted except in very special circumstances for purposes other than agriculture, forestry, recreation, cemeteries and other uses appropriate to a rural area.”Development can only include “limited infilling in existing villages”. A development of up to 2400 houses at Bassingthorpe Farm cannot be described as “infilling”.

1.9 The Core Strategy does not take sufficient account of the National Planning Framework with regards to the use of agricultural land where ‘local planning authorities are instructed “to use areas of poorer quality land in preference to that of higher quality.” Bassingthorpe Farm currently produces a wheat yield of 4 tons per acre [10.044 tonnes per hectare – tons per acre x 2.511 = tonnes per hectare] (above the national average) a yield of 1.5 tons per acre (3.7665 tonnes per hectare) of oil seed rape plus haylage. Building on this land would be deleterious to the National need for home grown food and reducing ‘food miles’.

1.10 The council has not shown any ‘exceptional circumstances’ to justify any alteration to Greenbelt boundaries. In the Focused Changes to the Core Strategy document produced by the council in January 2013 the council state there will be only be “a limited review of greenbelt in other areas” and state that both Bassingthorpe Farm and Dinnington East will be simply “taken out” of Greenbelt. This does not suggest an assessment of alternative options. The proposed building on Greenbelt land at Bassingthorpe seems to be a convenient way for the Council to allow developers to build a large number of houses in an area of productive farmland near a major town centre and fulfil its Government requirement to produce a local plan. **It does not represent exceptional circumstances.** Rotherham should take the initiative and refuse this sort of ‘quick fix’ and become instead a National leader in alternative development. E.g. all brownfield sites should be identified and utilised before even considering greenbelt, encouraging the new opportunities for sustainable development and
growth through the reuse of existing buildings as proposed by the Government consultation document ‘Greater flexibilities for change of use: consultation’.

There are clear inconsistencies between paragraphs 5.2.11 and 5.2.41. In the former, the council states they have assessed land parcels for their contributions to fulfilling the purposes of Green belt as defined in the NPPF. Yet in the latter they say they are reviewing greenbelt designations to allow building to take place. It seems land will only be protected under NPPF greenbelt guidelines once RMBC have removed any existing greenbelt land they claim is needed for residential development. They define Bassingthorpe as on the “urban fringe” yet do not define “urban fringe” or distances involved. There are inferences that the site is adjacent to the town centre which site visits would clearly dispute.

1.12 Although the Core Strategy examines alternative locations for growth there has been little acknowledgement of this assessment in the choice of Bassingthorpe as a primary location for growth. There is clear confusion between availability and sustainability in the choice of site. When assessed by the Council Sites Bassingthorpe Farm sites LDF0157, LDF0159, LDF0161, LDF0162, LDF0163 were all assessed by the council as having at least three potentially significant constraints in terms of sustainability. These largely centred on Socio-economic, environmental and greenbelt. Yet each of these locations has been allocated as residential. In contrast sites LDF0784 and LDF0785 (land off Moor Lane north and Moorhouse Lane) were assessed with similar results but were not allocated as housing.

1.14 There is a lack of clear vision for the future pattern of development of Bassingthorpe farm. According to the Bassingthorpe Viability Assessment Stage 3 Report published in June 2013 by Fitzwilliam Estates and RMBC: “areas which do not require significant up front expenditure in terms of infrastructure, remediation or ground reworking should be considered as early phases for development.” This clearly suggests that building will begin on greenbelt as it is easier and there is no indication whatsoever that development will spread from town outwards as required which would reassure residents of Greasbrough that their community will not increase in size with little intention of improving infrastructure until existing services can no longer cope. This is exacerbated by the intention of RMBC to impose a CIL of £15 to build on the Bassingthorpe Farm development compared to £65 in other areas of Rotherham. In RMBC’s Community Infrastructure Levy study July 2013 it states that “the infrastructure funding gap is 3x greater than anticipated CIL revenues” and that infrastructure costs will be £26 million. This does not suggest that Bassingthorpe is a sustainable location for development.

1.15 The core strategy should not identify land at Bassingthorpe Farm as a broad location for growth. The constraints to its development would be:

- the urban sprawl it would create from the Rotherham town centre through to the Rockingham housing estates north of Greasbrough, with little ‘buffer’ land in-between.
- A further constraint would be the lack of employment opportunities in the local area. This should not be created as a dormitory suburb for Sheffield, accessed by road, rail or the proposed ‘tram-train’. (Rotherham LDF Transport Impact and Mitigation Assessment, page 23, 6.10 Change in the distribution of traffic). This would not benefit Rotherham, and certainly not the Council’s desire to regenerate Rotherham Town Centre. The Council must realise that this has now moved out of town to the
nearby Parkgate shopping centre and the Meadowhall Shopping Mall on the Rotherham/Sheffield border, where free parking is available.

- The development of Bassingthorpe Farm does nothing to assist the regeneration of Rotherham town centre and the objectives of Rotherham Renaissance. In fact the major regeneration of the town centre and increased footfall will be as a result of a large new ‘Tesco’ superstore already being built in the town centre. Extra housing on Greenbelt to regenerate the town is therefore unnecessary and certainly not a reason for losing valuable greenbelt. The Council are already claiming that the town Centre is regenerating thanks to measures they have already put in place.

- A major constraint to development should be the proximity of the Victrex chemical works at the bottom of Gin House Lane. Much of the proposed development site is adjacent to the historic ‘buffer zone’ of that works in the event of a major incident. The site of the ‘aspirational school’ marked on the plan is also close to the edge of this “buffer zone.” The site is classed as COMAH Tier 1, and so detailed emergency and evacuation plans are not available to the general public. However, when emergency services practice for a major incident at the site, no-one is allowed nearer than the junction of Munsbrough Lane and Bassingthorpe Lane, all of which land is within proposed building land. Consultations with Dr. Paul Buchanan of the Environment Agency regarding the Victrex site showed he seemed unaware of the latest changes in the plans for the area, and was extremely concerned that there were plans to put a school so close to the works.

- The basis of the estimate of 2400 dwellings seems to be forecasts of projected growth of Rotherham’s population, much of which would be local migration from Sheffield, and takes little account of the recent commencement of the Waverley development of 2500 dwellings, or the proposed development of 300 dwellings in Rawmarsh., 470 in the north of the borough at Manvers, 65 homes at Hoober, 90 homes off Fenton Road, adjacent to the proposed Bassingthorpe development. (see document ‘State of The Borough 2008’ pp.4,5) or the number of empty properties, both LA rentable and private within the borough. Rotherham also has a large number of unoccupied dwellings which should be used before considering any development. According to Government Neighbourhood Statistics’ latest figures, Rotherham has 1.4% of its total housing stock valuation list empty.

- The Core Strategy does not take sufficient account of the geological problems likely to be encountered on the site. There are numerous old mine shafts in the fields whose size, depth location and state is not clearly known.

- There is a geological fault running through the site designated LDF0159
- Much of the land was once strip mined and the sub-soil layers are infill.
- Areas of the proposed development border a recent landfill site which is monitored for its toxic emissions. These emissions continue to vent into the atmosphere and toxins possibly filter underground to enter the drainage system of any building development and thus enter the river system.

1.16 The pattern of development would not promote the use of sustainable modes of transport. Unless employment opportunities are provided within the town centre, the main mode of transport would be by private motor car used to access Parkgate Shopping, MeadowhallMall or the local supermarkets and employment further afield. Traffic flow statistics predict significant increases in the Bassingthorpe area by 2028 (Rotherham LDF Transport Impact and Mitigation Assessment). Current use of public transport is cost
prohibitive: it is cheaper to take a taxi to and from town. Steep hills in the area would negatively impact cycling. The distribution of growth should, and currently is, slanted more towards Sheffield in the Waverley site.

1.17 The Core Strategy does not set out adequately how much development is intended apart from an often-changed total number of dwellings, type of dwelling and location of each type. Time scales seem flexible, and although concept plans suggest some indication where development would begin, and over what timescale each parcel of land would be developed these are only concept plans, not definitive. Equally, the suggested timescale of development suggests an adhoc use of land in sections, many of which do not link with others around them. There is no suggestion that infrastructure will be in place before houses are to be built which is of great concern to local residents. Equally disturbing is the fact that any objections to the Core Strategy which have been submitted by developers all focus on the low numbers of houses being built in Rotherham which would imply that once building began on the greenbelt it would be impossible to control the numbers and type of housing being built.

Similarly, there is no legal requirement for developers to fulfil their aspiration for improved infrastructure e.g. the council acknowledge that were Bassingthorpe Farm to be developed a new 3 bay fire station would be required yet we are currently facing a reduction in local fire personnel with no plans for future recruitment.

1.18 The concept plan being considered for Bassingthorpe Farm appears ambitious in its concept significantly with no guarantees that this will be the appearance of the final development. It is highly unlikely that it will promote or reinforce local distinctiveness as this has already been eroded from Greasbrough village which until the 1950’s was a distinct rural community. Since that time it has become encroached upon by RMBC housing estates at Kimberworth Park, Wingfield and Munsbrough and its population and local distinctiveness severely challenged. It is hard for Greasbrough residents to accept that the final area of greenbelt which separates them from Rotherham town centre is now to be removed. It is difficult to comment on housing numbers per hectare as phrases such as 35 dph are meaningless to the layman. Are there established estates locally that can be visited with this number in mind to see the proposed housing concentrations? Would these change once the development was underway? According to the development Concept Plan the first dwellings to be built would be 2 storey family dwellings, yet according to figures in Rotherham’s Core Strategy Paragraph 3.0.3 there will be a 39% increase in the over 65+age range between 2012 and 2028 How is this increase being met by the “good design” of proposed housing stock at Bassingthorpe Farm? Where is the accommodation for this expanding demographic?

1.19 Building on Greenbelt land would adversely affect any effort to combat climate change. Rotherham has suffered considerable problems with flooding in the recent past, and large housing developments on farmland must create more danger of this happening again. The National Planning Policy Framework states that developments should be located away from flood risk whenever possible. CB1, CB2 and CB3 are all land that is on a flood plain as shown on the Environment Agency Website. In the past Rotherham has allowed building on land previously deemed to be in the Flood plain – with disastrous results.
These fields have a natural spring and bogs. It has a stream piped in from Ochre Dyke which joins into the bottom stream adjacent to Cinderbridge Road, which takes overflow away from Wentworth Dams. During the floods of 2007 these fields took the heavy floodwater away from these dams away from the Wentworth Estate land and the nearby houses in Greasbrough, which saved many homes from flooding, although some had their cellars flooded as the natural water-table is high in the area. Loss of this flood plain would mean a high risk of floods to existing village houses as well as any new build properties. There is a DVD available of this flooding. Please contact to request a copy.

The Flood plain does what its name suggests. There’s a reason it is called a flood plain! (see photos below, winter 2007)

**Summary**

- RMBC have not proved the exceptional circumstances required to take up to 50 hectares of land out of Greenbelt in the Greasbrough area.
- The development would result in unsightly urban sprawl and reduce local distinctiveness.
- The development would not make a positive contribution to the local character of Greasbrough—it would destroy it.
- There are too many major mitigating circumstances which should prevent even the consideration of development—mine-workings, geological faults, impact on historical heritage, loss of good quality farmland, noxious emissions, the site’s proximity to an existing COMAH tier 1 and landfill site, proposed building on flood plains.
• All brownfield sites should be used for development before work begins on greenbelt sites—once the land is used for residential it cannot be brought back to its original agricultural purpose

• Greasbrough has already had its local distinctiveness changed due to intensive building in the 60’s, 70’s and 80’s which has changed the nature of a rural, cohesive community.

**ENOUGH IS ENOUGH.**