Rotherham Publication Core Strategy Examination

Consultee: Newbold Family / Wentworth Woodhouse
Consultee ID 533547

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

Has the Council complied with all the legal requirements, and in particular the duty of cooperate, and are the Core Strategy’s proposals for sustainable growth deliverable, clear sufficiently justified, effective and consistent with all relevant national policy.

Question 1.5 Does the Core Strategy adequately set out the main characteristics of the Borough, its main assets, problems (including various aspects of deprivation), its attractions, challenges and opportunities? How should the dispersed settlement pattern be regarded?

We consider that the Core Strategy continues to underplay the importance and significance of heritage assets in the Borough such as Wentworth Woodhouse and its associated historically designed landscape, and the opportunities that such assets provide in the promotion of the Borough’s future regeneration. Neither is it apparent that the Strategy has given the necessary ‘special regard’ to the preservation of such assets and their settings as required by legislation and guidance. Once such special qualities are degraded and are lost they cannot be recreated and any significant harm to such assets should be wholly exceptional.

Question 1.6 Subject to discussions in more detail at subsequent Hearings, is the vision for the Borough and the 17 Strategic Objectives realistic and achievable?

We do not consider that the Vision and Strategic Objectives are realistic and achievable - See our original representations on the Publication Draft
Question 1.7 In general terms, and subject to later discussions, does the Core Strategy adequately take account of the National Planning Policy Framework (the Framework)? Has the timescale for its preparation through its various stages allowed sufficient regard to be had to the Framework and, if not, what are the likely consequences?

We do not consider that the Core Strategy adequately reflects and implements the guidance in NPPF on ‘Conserving and enhancing the historic environment’. The focussed changes on these matters are welcomed but they only appear just to have the effect of making sure that the plan adequately references the guidance rather than having had any effective influence on the plan making process. It is however not then evident that polices within the plan actually seek to implement this guidance as the overall strategy, objectives and key policies within the plan (such as the proposals for Bassingthorpe Farm) have remained largely unchanged from earlier versions and appear to suggest a presumption in favour of the Bassingthorpe development at any cost. As a result, such proposals neither conserve nor enhance the historic environment but cause harm to it.

Question 1.8 Has the Core Strategy been positively prepared and, if so, in which ways? Subject to more detailed discussions with regard to housing, employment and retail, does it fully meet the objectively assessed development needs of the area? And does it do so with sufficient flexibility to adapt to change? And what might be the consequences of any insufficient flexibility?

As outlined in our original representations we consider that the Core Strategy fails to provide “the positive strategy for the conservation and enjoyment of the historic environment” required by NPPF (Para 126). References to any protection of the historic environment are often also further diminished by the statement in Objective 8 that any such protection having to allow for the growth of certain settlements or the identity of settlements only being protected “wherever possible”.

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Question 1.9 What are the physical and environmental constraints to development in the Borough? To what extent does the Core Strategy take account of the Framework paragraph 112 concerning the best and most versatile agricultural land?

One of the key environmental constraints to development within the Borough is the historically designed landscape associated with Wentworth Woodhouse, its regional, national and international significance and its associated listed structures and monuments and green corridor approaches. The original designed landscape of Wentworth Woodhouse is much more extensive than the current Grade II* Registered Park and Garden and provides an equally important role in key views to and from the Mansion House, between the mansion house and its outlying listed monuments and in views from public rights of way within the Designated Parkland. There are also significant cultural heritage associations which have made the place what it is today.

Intervisibility between these features is a key consideration in landscape and visual terms and an essential component of the historically designed parkland and wider landscape setting. In addition to these key views also exist to and from other historically significant buildings and features within the Borough. For example expansive views exist between Boston Castle Shooting Lodge built by the 3rd Earl of Effingham) and Keppel’s Column, Wentworth Woodhouse and the South Terrace and currently over the open fields between Boston Castle and Barbot Hall with the latter clearly visible from the East front of Wentworth Woodhouse. An assessment of the Historic landscape Character places the Bassingthorpe Farm Area firmly within the wider agricultural setting of the designed landscape of the park during the 18th and 19th centuries and highlights the role that the area played not only in the context of the wealth accumulated through agricultural productivity but as the main approach to Wentworth Park from Rotherham, including its intervisibility with Wentworth Woodhouse, the park and associated monuments from the high ground to the south of Greasbrough.

In the light of the clear guidance and aspirations listed in policy CS23 and NPPF it is disappointing, and ultimately unsound, that this guidance and the commitment to protect and
enhance historic environment appears to stand in isolation and is not also woven into the wider policies and proposals of the Core Strategy including proposals for the strategic green belt release and urban extension at Bassingthorpe Farm where issues relating to the impact of development on the historic environment have not been adequately addressed and balanced against other criteria. If it had been woven into the other polices in the plan it would be clear that the current proposals for e.g. Bassingthorpe Farm are unsound because of the harm that they will cause to the historic environment of Wentworth Woodhouse. Such harm cannot be justified because it could be avoided by releasing green belt land from development elsewhere, where there would be no such impact.

**Question 1.10 Have exceptional circumstances been demonstrated to justify any alteration to Green Belt boundaries? Is the matter adequately considered in the Core Strategy, or is too much reliance being placed on the Sites and Policies DPD? Should any additions or deletions be made to the locations identified in Policy CS4 for broad extent of changes? Are paragraphs 5.2.11 and 5.2.41 consistent?**

For the reasons outlined in our original submission we do not consider that the necessary exceptional circumstances have been demonstrated by the Council to justify the green belt deletions currently proposed at Bassingthorpe Farm. Para 5.2.70 states that the need to find land to meet the Borough’s long term employment needs and ensure provision of sufficient housing to accommodate population growth: “form the exceptional circumstances to justify exploring the release of land that currently has a green belt designation”. However such needs are hardly ‘exceptional’ and there is little evidence presented in the Core Strategy to actually justify the various statements that such needs cannot be accorded on non-green belt land or other less sensitive green belt land. Indeed this question cannot be answered until such a comprehensive review assessing green belt as well as all other sustainability and constraints considerations has been undertaken.
In relation to the proposed strategic allocation at Bassingthorpe Farm the Council has, since 2008, persistently sought to promote Bassingthorpe Farm as a way of meeting future housing and employment needs, initially in response to the Growth Point Initiative and more recently as part of the Core Strategy. The 2007 Core Strategy Preferred options contains no such provision. However it was only in April 2012 that it published its Strategic Green Belt Review. There is no evidence that prior to this the Council undertook any form of rigorous assessment of the role that the Bassingthorpe Farm site plays in the Green Belt and what exceptional circumstances existed, if any, to support the specific deletion of this land from the green belt to accommodate the proposed development.

The status of this Review is unclear as is whether the Council is relying on the findings of this review to justify the proposed deletions of land from the Green Belt that are implicit in the Core Strategy or whether it is solely meant to inform the Sites and Polices DPD. Policy CS4 states that: “A comprehensive review of the boundaries of the Green Belt will be undertaken and shown on the proposals Map to accompany the Sites and Polices DPD.”

Overall therefore there does not appear to be the evidence available to demonstrate that the necessary exceptional circumstances exist to justify specific proposed deletions from the Green Belt that would be required to enable the delivery of the Bassingthorpe Farm development.

Nor similarly have the “wholly exceptional circumstances” been demonstrated (as required by Para 132 of NPPF) that are required to justify this development which will result in substantial harm to heritage assets of the highest significance. The decision to promote Bassingthorpe Farm as a strategic location for growth was made prior to the Council a Heritage Impact Statement as required by NPPF. Even with the publication of this document we have concerns that the significance of the historic setting, context and cultural heritage associations have not been adequately considered (see comments in relation to Matter 6). As a result the Core Strategy fails to properly recognise and given adequate weight (special regard) the setting of perhaps the most important assemblage of listed buildings in the Borough and further afield and its associated historically designed landscape.
In the light of the above we considered that Bassingthorpe Farm should be removed from Policy CS4

Question 1.11 Are the proposals for safeguarded land justified, with particular regard to the areas of search?

Given that the necessary exceptional circumstances do not yet appear to have been demonstrated to justify either the principal of releasing land from the Green Belt to meet future housing and employment needs, the scale of that release and which individual sites should be released the necessary exceptional circumstances to support the safeguarding of land also cannot be justified.

Question 1.12 Have any reasonable alternative options been assessed to achieve the economic, social and environmental objectives in a sustainable way? Has the correct balance been achieved between these 3 dimensions? Does the Core Strategy set out the most appropriate strategy against reasonable alternatives? Why are the chosen locations for growth the most sustainable?

We do not consider that the Core Strategy, in its consideration of alternative options has achieved the correct balance between the three dimensions of sustainability. In all respects it fails to give the necessary special regard, required by law and guidance to the protection of the significance of heritage assets and their settings. Protecting and enhancing the historic environment is a key element of securing a sustainable pattern of development as it ensures that key heritage assets are protected for the benefit of future generations. It is of perhaps greater importance than most other dimensions of sustainability because heritage is an irreplaceable resource and therefore need to be given special regard in the planning balance. It is not evident that in the Council’s assessment of alternative options that the correct balance has been drawn – indeed in some instances the correct heritage context has not even been identified.
Question 1.14  Is there a clear vision for the future pattern of development with particular regard to housing, employment and transport proposals? Should any settlement be added to any level in the hierarchy?

The future pattern of development outlined in the Core Strategy is clear. We would not advocate the inclusion of any additional settlement to the hierarchy but would question the status of Thorpe Hesley in the hierarchy. We consider that Thorpe Hesley should be demoted from Local Service Centre to Other village within the hierarchy. This categorisation would better reflect the Council’s assessment that Thorpe Hesley has a very limited range of shops and community facilities and what do exist are small scale and serve only the settlement itself. There are also no significant employment opportunities. As such it is not comparable with the other Local Service Centres listed in the Plan.

Question 1.15 Should the Core Strategy identify land at Bassingthorpe Farm as a broad location for growth? What are the constraints to its development, and how could they be reduced or overcome? What are its sustainability credentials? What is the basis of the estimate of 2,400 dwellings? How would its development assist the regeneration of Rotherham town centre (see Fact Sheet No 4 – CSP/17) and the objectives of Rotherham Renaissance?

The Newbold Family would object very strongly to any strategic allocation at Bassingthorpe Farm that impacts adversely on the sensitive historically designed landscape surrounding Wentworth Woodhouse and its associated Grade I, II* and II listed structures and follies and Grade II* Registered Park and Garden and the visual linkages between these features. These features were designed as a ‘whole’ and much of their heritage significance and that of the surrounding landscape and setting derives from these inter-relationships and intervisbility and cultural heritage association. These assets are irreplaceable and in line with legislation and guidance special regard must be given to preserving them and their setting and any harm to them, resulting from the
proposed strategic allocation at Bassingthorpe Farm, requires convincing justification and must be regarded as ‘exceptional’. Any substantial harm would be ‘wholly exceptional’.

The Core Strategy does not identify the likely geographical extent of the strategic allocation but it is identified in the Draft Sites and Policies DPD. It is clear that the extent of the strategic allocation shown in the Sites and Polices DPD would as a minimum harm the significance of this assemblage of heritage assets and their settings. It also has the potential to cause substantial harm depending on the location, nature and extent of proposed development – as detailed in representations submitted on behalf of the Newbold family in connection with that document. As such this proposed allocation requires convincing justification. We are not confident that such justification exists, and that adequate weight has been attached to the protection of this heritage asset and its significance especially given the fact that the land is also green belt, and nor has it been adequately demonstrated that the Borough’s housing needs could not be met elsewhere in the Borough on other land where development would not result in such harm.

The Borough in coming to its conclusions about Bassingthorpe Farm appear to have only given the same weight to the protection of heritage significance and the setting of heritage assets as to other opportunities and constraints. They do not appear to have understood the contribution that protecting heritage asset plays in terms of promoting sustainable development.

Accompanying these representations is a report prepared by Ideal Dimensions on behalf of the Newbold Family and submitted in connection with the draft Sites and Policies DPD in 2013. It identifies those parts of the strategic allocation where development would harm the heritage significance and setting of heritage assets and where development cannot be justified. These submissions were also accompanied by a further suite of reports including: Bassingthorpe Farm Urban Extension Site Study: Study to establish the potential effect upon the landscape and historic character and the visual setting of the area January 2011. Copies of this document can be made available to the Examination if required.

**Question 1.20** Does the Core Strategy provide a suitable basis for the delivery of a sustainable future that balances economic, social and environmental interests (including a radical reduction
in greenhouse gas emissions and air pollution and providing resilience to the impacts of climate change) and does it adequately support the delivery of renewable and low carbon energy and associated infrastructure (Framework paragraphs 6, 8, 17 & 93)?

As highlighted in our original representations and above we consider that the Core Strategy does not give adequate weight to protecting and enhancing the historic environment of Rotherham, particularly in respect of its proposals for the Bassingthorpe Farm strategic allocation. The historic environment is irreplaceable and its protection and enhancement should therefore be given additional weight in promoting sustainable development especially given its national importance. The Wentworth Woodhouse estate has played an important role in the history of the UK and the Region and is of national/ international significance as a heritage asset at least on a par with other better known estates. Its setting and context has however been subject to many unsympathetic incursions that have detracted from its significance and heritage qualities. These mistakes should not be replicated or made worse through cumulative impact by the failure of the Core Strategy to give adequate consideration to the impact of development on the historic environment or to otherwise fail to protect the historic environment from harm. Heritage protection is a key element in any assessment of sustainability and it is vitally important therefore that Wentworth Woodhouse together with its historic context and setting is protected for the benefit of future generations.