ROtherham Core Strategy
Public Examination

Matter 1 Statement

Prepared on behalf of
Mr and Mrs G Fisher

September 2013
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SECTION 1 INTRODUCTION

1.1 We are acting on behalf of Mr and Mrs G Fisher, owners and occupiers of land at Hardwick Lane Farm, Hardwick Lane, Aston (“the subject site”) in respect of the public examination on the Rotherham Core Strategy.

1.2 The subject site is located within Site No. LDF0583 (as well as LDF0585) and we have previously submitted written representations on both the Rotherham Core Strategy DPD (“CS”), which is the subject of the current public examination, and the Sites and Policies DPD.

1.3 Within the emerging Sites and Policies DPD, the subject site is proposed to be allocated as an auto-exclusion zone and its Green Belt designation is proposed to be retained.

1.4 We objected to the proposed allocation and designation for the subject site on the basis that it has significant development potential for employment-generating land uses consistent with the aims and objectives of the CS.

1.5 Whilst the CS DPD and the Sites and Policies DPD are intrinsically interlinked, only the CS has been progressed to public examination at this stage.

1.6 A number of matters, issues and questions have been published in connection with the examination to determine whether the CS meets the four tests of soundness set out in the National Planning Policy Framework (“NPPF”), these being that it is:

- positively prepared;
- justified;
- effective; and
- consistent with national policy.

1.7 This written statement has been prepared to demonstrate that, in its current form, the CS does not meet the above-referenced four tests of soundness.

1.8 Only the matters, issues and questions relevant to the subject site will be addressed to demonstrate that the CS is not sound. These matters are as follows:

- Matter 1 - Requirements, Vision, Strategy, Objectives and Sustainability;
- Matter 4 - Infrastructure and Monitoring; and
1.9 In accordance with the examination requirements for written representations, there will be a statement dedicated to each of the above matters. Matter 1 is addressed in this statement.
SECTION 2 MATTER 1

2.1 As highlighted in Section 1, only the matters relevant to the subject site will be addressed. This also applies to the individual issues and questions under each matter, which are addressed in turn below.

Question 1.5

2.2 This question asks whether the CS adequately sets out the main characteristics of the Borough, including its assets, problems attractions, challenges and opportunities. The question also asks how the dispersed settlement pattern should be regarded.

2.3 In response to this question, the CS does identify a number of opportunities; however these are general to the Borough. For example, Paragraph 3.0.14 states that due to cuts in public expenditure, it is likely that Rotherham will see a significant reduction in public sector employment. This paragraph goes on to state that there will be a need to attract more private companies to invest in Rotherham and encourage business growth.

2.4 The CS does not make sufficient reference to opportunities on a settlement by settlement or site by site basis, and this needs to be addressed. This is not a justified and effective approach and fails to provide the flexibility that will be required in the employment land system.

2.5 As highlighted in previous representations, there is opportunity for the subject site, or at least part of it, to be developed for employment-generating land uses. This is in accordance with the CS vision that “Rotherham will be prosperous with a vibrant, diverse, innovative and enterprising economy”. However, this opportunity has not been given any consideration by the Council.

2.6 The subject site is situated within one kilometre of Junction 31 of the M1 motorway, and Hardwick Lane itself is immediately accessible by the A57. The centre of Aston (a Principle Service Centre/Settlement) is also located two kilometres to the west and Todwick (a Local Service Centre) two kilometres to the south.

2.7 Furthermore, land immediately to the south of the subject site has been developed for employment in the form of a highways depot, and land to the east has existing commercial premises.

2.8 Whilst it is appreciated that the Sites and Policies DPD will set out site-specific policy, this needs to be well linked to the CS and opportunities specified on a settlement by settlement basis. Paragraph 5.2.25 of the Core Strategy (publication version) acknowledges the lack of employment opportunities in this area of the Borough. Therefore it is suggested that the
CS does not take sufficient account of the proximity of adjacent communities and/or transport assets in its formulation.

Question 1.6

2.9 This question asks whether the vision and strategic objectives set out within the CS are realistic and achievable.

2.10 In response to this, it is considered that the vision and strategic objectives in respect of employment and economic growth are not realistic nor achievable.

2.11 Objective 1 states: “By the end of the plan period sufficient new homes and employment opportunities and a choice of development sites will be provided to meet the borough’s projected needs against locally-derived targets for house building and provision of employment land”.

2.12 A number of targets are set out at Chapter 5 of the CS. In respect of Aston, Aughton and Swallownest, a target of 19 hectares of new employment land has been identified (the target is stated as 16 hectares within the Draft Sites and Policies DPD). However, only five potential employment sites are identified within the Draft Sites and Policies DPD, amounting to 18.7 hectares.

2.13 As well as a potential shortfall of 0.3 hectares, only five sites have been identified to meet the minimum. One of the sites (LDF0451) could have a range of contaminated land issues, but more importantly commits nearly half of the potential allocation to a single site. This provides little flexibility and, should one of the sites be unavailable, then the targets for employment growth may not be achieved. This approach is clearly not effective and is not justified given the availability of even better located alternative sites such as LDF0583.

2.14 We would therefore like to draw the Inspector’s attention to poor links between the CS and Sites and Policies DPD in terms of discrepancies in targets and insufficient sites and strategy to meet these.

Question 1.7 and Question 1.8

2.15 These questions ask whether the CS adequately takes account of the NPPF and whether it has been positively prepared and meets objectively assessed development needs.

2.16 In response, the CS has been positively prepared in terms of what its vision and strategic objectives set out to achieve. However the CS, when considered along with the Sites and Policies DPD, is too inflexible with only a limited number of sites identified to meet employment needs and targets.

2.17 It is unclear how, with such rigid targets, new development opportunities (which do not form part of those sites already earmarked) will be realised,
particularly when such opportunities may be sustainable (refer to Paragraph 2.1.13 above)

2.18 In this regard it is considered that the CS does not adequately take account of the NPPF in terms of the national government’s commitment to securing economic growth. Paragraph 21 of the NPPF specifically states that investment in business should not be over-burdened by the “combined requirements of planning policy expectations”, which will be the case if the CS is adopted in its current form.

2.19 Paragraph 157 of the NPPF confirms that Local Plans should, amongst other matters, seek to “allocate sites to promote development and flexible use of land, bringing forward new land where necessary...”. The opportunity exists to provide further flexibility and lessen the strain on the immediate environs of the principle settlement centre around Aston, which is more likely to suffer cross boundary conflicts with the neighbouring Sheffield strategy.

2.20 Sites LDF0583 and LDF0585 are also ideally situated to make best use of the recent upgrades to the A57, increasing the viability of the development potential and making best use of this regionally significant improvement.

Question 1.10 and Question 1.11

2.21 This question asks whether any exceptional circumstance have been demonstrated to justify alteration to Green Belt boundaries, whether any additions or deletions should be made to Policy CS4 and whether the proposals for safeguarded land are justified.

2.22 Policy CS4 states that changes to the Green Belt will be considered in a number of locations, including principal settlements such as Aston, in order to meet development needs within the Borough.

2.23 In this regard, a case has been put forward for release of the subject site (or part of the subject site) in a previous representation on the CS and Sites and Policies DPD. However, this has not been given any substantial consideration by RMBC.

2.24 A Green Belt Review was undertaken by RMBC in April 2012. The subject site is located in Parcel 111, which extends beyond the subject site to the north and east. As highlighted within a letter dated 6 August 2012 and as detailed above, commercial land use and built development exists to the east and south of the subject site and the M1 motorway is situated to the west, and therefore its release from the Green Belt would not be inappropriate nor would it be a significant loss to Green Belt. This, however, has not been given any consideration by RMBC.

2.25 The permanence of the M1 motorway within this designation means that the openness and tranquillity of the immediate area has been taken away. It is considered that it is unnecessary to keep the land permanently open and at
the very least could be considered as safeguarded land in accordance with Policy CS5 because of the proximity of the strategic road assets.

2.26 Whilst it is appreciated that release of specific sites from the Green Belt is a matter for the Sites and Policies DPD, there is a need for all Development Plan Documents to be linked. Of the five sites within Aston, Aughton and Swallownest which have been allocated as Employment Development Sites/Potential Employment Sites, two sites (LDF0449 and LDF0758) are both situated within the Green Belt and, as with site LDF0583, are also in agricultural land use.

2.27 The site assessments which have been carried out in support of the above mentioned allocated sites identify both as part of a ‘Green Wedge’ and also highlights that “if they were to be developed the A57 to the south provides a strong defensible Green Belt boundary”. This would also apply to the subject site located off Hardwick Lane whereby the A57 located to the south would act as a boundary preventing urban sprawl and ‘neighbouring towns merging into one another’. This indicates that RMBC is able to select any site for release from the Green Belt as it so chooses.

2.28 Furthermore, the CS only makes limited reference to the Green Belt Review even though this is a central document that will determine what Green Belt land will be released and where. It is unclear whether there is any phased strategy or otherwise for release of Green Belt land for development.

2.29 In order to address this situation it is suggested that the key transport corridors and where present, strategic assets such as the M1 motorway and A57 when co-located, should be considered as safeguarded sites to provide long term flexibility and a more justified approach, giving a reasonable alternative to just primary centre lead development consistent with the aim of supporting a prosperous rural economy.

2.30 We therefore also question how well linked the CS is with supporting documentation and the Local Evidence Base. It appears that too much onus is being placed on the Sites and Policies DPD in this regard.

Question 1.12 and Question 1.20

2.31 These questions ask if the objectives of sustainable development have been balanced effectively. In response to this, the overall approach of the CS, ie its vision and strategic objectives, is positive and balances the objectives of Sustainable Development. However, in terms of deliverability on a settlement by settlement and site by site basis, sustainable development is not given adequate consideration nor is it accommodated.

2.32 The development targets for each settlement are too rigid and it is unclear how new and sustainable development opportunities can be realised.

2.33 The CS is also poorly linked with the emerging Sites and Policies DPD and what the CS fails to mention is that sites for development to meet these
targets have already been earmarked. This is clearly an unsustainable approach and the CS is misleading in its sustainable development credentials.

Question 1.17

2.34 This question asks whether the CS’s proposals to deliver sustainable growth are clearly articulated.

2.35 To reiterate previous points, the targets for growth and supporting policy are too rigid and will not accommodate new opportunities for development which sit outside those sites already proposed to be allocated within the Sites and Policies DPD.
SECTION 3 SUMMARY

3.1 To summarise, it is considered that the Core Strategy in its current form is neither sound nor legally compliant. Although it has been positively prepared, it is not justified, effective or consistent with national planning policy.

3.2 The Core Strategy, particularly when considered alongside the Draft Sites and Policies DPD, is too rigid, inflexible and unresponsive to new opportunities for employment and economic growth.

3.3 There are also concerns that the evidence base is poorly linked with the Core Strategy, such that the Council is able to manipulate this as required. The Draft Sites and Policies DPD is also poorly linked with the Core Strategy.

3.4 These statements are submitted to the Inspector to consider in detail before making a decision on whether the Core Strategy is sound and legally compliant.