ROtherham Metropolitan Borough Council: Local Development Framework

Examination in Public: Rotherham Publication Core Strategy

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

1.0 Introduction

1.1 On behalf of our client, Hallam Land Management, Nathaniel Lichfield and Partners ("NLP") is pleased to submit this statement in relation to Matter 1 ‘Requirements, Vision, Strategy, Objectives and Sustainability’, to the Inspector for the Examination Hearings of the Rotherham Core Strategy (June 2012).

1.2 This Statement should be read in conjunction with ‘Rotherham Core Strategy: Assessment of Housing Requirements to Inform Examination’ (September 2013), appended to this statement. The document presents a detailed assessment of the objectively assessed housing needs for the Borough.

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

Issue 1: Has the Council complied with all the legal requirements, and in particular the duty to co-operate, and are the Core Strategy’s proposals for sustainable growth deliverable, clear, sufficiently justified, effective and consistent with all relevant national policy?

1.1 What measures has the Council taken to comply with the duty to co-operate, with which local authorities has that co-operation taken place and what has been the outcome of that co-operation? What documentary evidence is there of that co-operation and what evidence is there in the Core Strategy of the effectiveness of that co-operation?

2.1 Rotherham MBC have undertaken a number of steps in order to comply with the duty to co-operate. These are set out within ‘Background Paper: Duty to Co-Operate’ (CSP 5), which outlines the process which has been followed including meetings with all of the neighbouring local authorities – Barnsley, Bassetlaw, Bolsover, Derbyshire and Nottinghamshire, East Derbyshire and Sheffield. Discussions also took place with a range of Stakeholders at stages in the development of the Core Strategy.

2.2 The background paper CSP 5 identifies the issues which have been raised in cross-boundary discussions and identifies how Rotherham anticipates dealing with these.

2.3 A number of documents which form the local evidence base to the Core Strategy have been undertaken in conjunction with adjacent authorities,
including the joint Strategic Land Availability Assessment (SHLAA) (LEB 13) with Sheffield and the Sheffield City Region Modelling (REB 16).

However, it is not clear how this co-operation has shaped the Core Strategy.

2.4 Have there been any discussions at any time with a nearby Borough or District to accommodate any unmet need, and has any nearby Authority requested the Council to meet any of its needs? And what was the outcome of any such request? For example, are any arrangements or understandings in place between the Council and Sheffield City Council? In which ways has the Council acted as a ‘good neighbour’ in matters of town and country planning?

2.5 Examination document CSP 5 identifies Sheffield raised concerns in relation to the housing requirement in Rotherham’s Core Strategy which is lower than that identified in the Regional Strategy.

2.6 Sheffield City Council have objected to the Core Strategy on the basis that Rotherham has only made an allowance for the shortfall in housing delivery from 2008, despite a shortfall from 2004. A memorandum of understanding is to be produced and made available which sets out the position regarding Rotherham’s local housing target. The document will also identify any issues where agreement has not been reached.

1.4 Is the plan period, 2013 -2028, the most appropriate one? Should it be longer? Should it be unspecified, i.e. the next 15 years?

2.7 Given the length of time it takes to establish the evidence base to support the development of local plan documents, an unspecified length of time such as ‘the next 15 years’ is more appropriate than a specific period. This would ensure that the maximum length of time is secured from adoption to the point of review.

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?

2.8 The vision and objectives identified within the Core Strategy support the principles identified in the National Planning Policy Framework (NPPF) in terms the economic, social and environmental role of the planning system in achieving sustainable development taking account of locally important circumstances. We support the Council in achieving their vision and strategic objectives identified in the Core Strategy. However, achieving Strategic Objective 1 ‘The Scale of Future Growth’ will be difficult given the lack of alignment between the housing requirement identified in the Core Strategy and the economic growth ambitions of the Borough. The ‘Assessment of Housing Requirement’ undertaken by NLP identifies that the local target of 850 dwellings per annum would only support an annual increase in jobs of 300, just 37% of the employment growth ambitions for the Borough, falling short of supporting economic growth targets set for the plan period.
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?

2.9 The Framework was published in March 2012 and expects that “a Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area” (para 158).

2.10 Local and Core Strategy evidence base documents produced by Rotherham Council contain documents dating back to 2005. A number of documents have been revised and updated following publication of the Framework, which take into account the principles identified by the Framework and updated evidence which underpins the policies set out within the Core Strategy.

2.11 The Framework also states that “….their assessment of and strategies for housing, employment and other uses are integrated”. The Core Strategy states a local housing requirement of 850 dwellings per annum between 2013 and 2028, a total requirement of 12,750. This sits alongside the aspiration to create between 12,000 and 15,000 new jobs over the same period, between 800 and 1,000 dwellings per annum. NLPs demographic and economic modelling suggests that the proposed housing requirement is insufficient to support the economic aspirations of the Borough.

2.12 It is of concern that the Council has not aligned its economic and housing strategy. This leaves the chosen housing requirement entirely inappropriate given the job growth planned for in the Borough. It also questions whether the policies set out in the Core Strategy meet the requirements of the Framework.

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?

2.13 The overall scale of housing planned in the Core Strategy would not meet the full, objectively assessed need.

2.14 The planned housing requirement would fail to reflect nor support the growth agenda which is central to the NPPF nor the vision or objectives for Rotherham in terms of:

1. Supporting the achievement of a modern, diverse and enterprising economy; and,

2. Improving the choice, quality and affordability of housing.

2.15 The Core Strategy is therefore not positively prepared nor is it effective at meeting objectively assessed need.
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?

2.16 Policy CS4 states that a Green Belt review will be undertaken to inform the Sites and Policies DPD. Policy CS4 does identify a number of broad locations where changes to the Green Belt will be considered including:

- The wider Rotherham Urban Area;
- Principal Settlements for Growth;
- Principal Settlements;
- Thurcroft; and
- Broad locations identified at Bassingthorpe Farm and Dinnington East.

2.17 Further consideration needs to be given to the settlement grouping of Wickersley, Bramley and Ravensfield (WBR) which could accommodate a level of growth commensurate to Dinnington, Anston and Laughton Common (DALC) and Wath-upon-Dearne, Brampton and West Melton. My client’s development opportunity at land north of Lidget Lane (reference LDF452 in the draft Sites and Policies DPD) lies to the north east of Bramley and would fit closely with the existing settlement form which extends to the north east. The site area is approximately 41 hectares and is capable of delivering a large proportion of WBR’s housing growth. Although the site is currently designated as Green Belt, the draft Core Strategy states that the future need for housing and employment land constitutes the exceptional circumstances needed to review the Green Belt in the Borough.

2.18 Lidget Lane to the south of the subject site forms a robust physical feature that represents a defined limit to growth within Bramley and development here would not lead to coalescence with any other settlement. Indeed, paragraph 85 of the NPPF states that Green Belt reviews should ‘define boundaries clearly, using physical features that are readily recognisable and likely to be permanent’.

2.19 The Council’s Settlement Capacity Report (SCR) (2009) suggests that if significant expansion is required in WBR then site LDF452 (the site to the north of Lidget lane) could provide the necessary growth as, other than its Green Belt designation, ‘there are few other constraints to developing this site’. The subject site is close to a number of key services, Bramley Town Centre is within 1km of the subject site and there is a large supermarket less than 2km away. In terms of employment opportunities, the site is just over 1.5km (by road) from Hellaby Industrial Estate, a 50ha employment site to the east. The site therefore represents a sustainable location for an urban extension and is suitable for housing. It therefore has a sound policy basis as it is in line with national policy
and is justified by a robust evidence base (Paragraph 182, NPPF). To conclude, there are sustainable strategic development opportunities in Bramley which could accommodate high levels of growth. It is currently unsound for the plan to claim otherwise.

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?

Policy CS1 sets out the Council’s broad preference for growth in Dinnington, Anston and Laughton Common (DALC), where Dinnington East is identified as the location for around 700 new dwellings. The evidence we have provided in previous representations to the draft Core Strategy shows that there are a number of important reasons why an urban extension to the east of Dinnington is not the most suitable, deliverable and sustainable option for the DALC area. This evidence relates to:

- The area to the east of Dinnington is constrained by Areas of High Landscape Value (AHLV).
- Agricultural Land Classification Maps confirm that the East Dinnington urban extension comprises mostly Grade 2 ‘Best and Most Versatile’ Agricultural Land. The land to the west of Dinnington is of a lower grade agricultural land (Grade 3).
- Several parcels of land which make up the East Dinnington extension run adjacent to Swinston Hill Ancient Woodland and Anston Stones Wood Site of Special Scientific Interest (SSSI). The additional recreational pressure from over 700 extra homes on these nationally important habitats has not been adequately assessed.
- There has been no robust assessment which looks at the extent to which the transport infrastructure is capable of accommodating the scale of development proposed in East Dinnington. Development in this area could exacerbate congestion in the centre of Dinnington as no improvements are expected through the delivery of this group of smaller allocated sites. These associated community and infrastructure benefits will not be delivered as they would with a masterplanned main urban extension such as proposals to the west.
- The potential allocation of East Dinnington for housing would further dislocate the residential areas of the settlement from the employment opportunities in Dinnington and Rotherham to the west.
An Extension to the West of Dinnington

2.21 Evidence provided in previous representations to the draft Core Strategy shows that there are a number of important reasons why an urban extension to the west of Dinnington is the most suitable, deliverable or sustainable option for the DALC area. This evidence relates to:

- The site could provide up to 1,200 new homes in this plan period, a school, community facilities, shops and approximately 32ha of employment land.
- This site is adjacent to a significant range and choice of employment and proposed opportunities
- An urban extension to the west of Dinnington offers good access to the strategic highway network, Sheffield, Doncaster and Rotherham, is midway between the two local comprehensive schools and would represent a sustainable extension to Dinnington. Residents would use Dinnington for local facilities and shopping but have easy access to Rotherham for employment opportunities and higher order retail.
- With appropriate landscaping and masterplanning, development would not lead to coalescence with Todwick
- West Dinnington has been identified within the Core Strategy as an area where opportunities for strategic employment growth may exist.

2.22 Overall, the publication Core Strategy does not provide a reasoned adequate justification for the Council’s preferred choice of East Dinnington over other strategic sites in Dinnington, particularly to the west. The Council, having considered relevant alternatives, has not based its decision on the most suitable and sustainable option given the evidence available. It is considered that a change is needed to Policy CS1 to identify West Dinnington as a Strategic Location for Growth in DALC.

1.13 How relevant to the Core Strategy is survey material which informed the Regional Strategy?

2.23 The Regional Strategy (RS) was adopted in 2008 and subsequently revoked in 2012. Whilst some of the evidence base has been superseded and cannot therefore be given weight, the RS was consulted upon and assessed by a Planning Inspector. It therefore provides a relevant context for the Core Strategy.

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?

2.24 Policy CS1 of the Core Strategy sets out the settlement hierarchy which will deliver Rotherham’s spatial strategy for future growth. The settlement hierarchy
comprises; Principal Settlement for Growth, Principal Settlements, Local Service Centres and other villages.

2.25 As set out in our previous representations to the Core Strategy, Wickersley, Bramley and Ravensfield (WBR) is identified as a Principal Settlement for Growth. However the Core Strategy proposes to locate only six per cent of the growth of new housing here (approximately 700 dwellings) compared to a 9% growth (1,100 dwellings approximately) identified for the other Principal Settlements for Growth.

2.26 The Core Strategy proposes to meet WBRs housing and employment requirement through a number of smaller allocations. As WBR is identified as a Principal Settlement for Growth, housing and employment growth should be planned through a strategic masterplanned site which would provide more certainty and control over the future of growth in the settlement area. This would ensure that the impacts of the additional population are properly mitigated and planned for through clearer infrastructure provision i.e. education and highways.

2.27 Given the disparity in the housing requirement identified in Policy CS1 between the three Principal Settlements for Growth, we suggest that the settlement hierarchy is not a justified or effective policy for delivering the settlement hierarchy and in particular the housing in the WBR Principal Settlement for Growth.