THE ROTHERHAM METROPOLITAN BOROUGH COUNCIL CORE STRATEGY
EXAMINATION IN PUBLIC

Inspector’s Questions Matter 1 -
Tuesday 22nd October and Wednesday 23rd October 10am

Written Statement by Barton Willmore on behalf of
Harworth Estates Limited ID: 666106

REQUIREMENTS, VISION, STRATEGY, OBJECTIVES AND SUSTAINABILITY

Preamble

Harworth Estates Limited is one of the largest landowners in the UK, owning over 30,000 acres of land. The Company is bringing forward a dynamic and progressive mixed-use development covering 740 acres of former colliery land at Waverley, the biggest brownfield site in the whole of South Yorkshire, and located within the Sheffield/Rotherham corridor.

Our client’s strategically located land at Waverley comprises prime development land. The vision for Waverley has been to provide a sustainable, mixed use development, and the internationally renowned Advanced Manufacturing Park (AMP) has been established at the site for a decade. In addition, the site already has outline planning consent for a new residential community of up to 3,890 homes together with significant supporting commercial development, and the first phase of the housing development is currently underway.

Specific plans for future development at Waverley include:

- Provision of around 45 hectares of modern advanced manufacturing, industrial, warehouse and office accommodation
- The provision of major residential development (up to 3,890 new homes)
- A wide range of supporting community, leisure amenities and retail facilities

Our client is grateful for the opportunity to appear at the Examination in Public and remain keen to ensure that the Local Plan is properly formulated and robust.
Our client's land offers an excellent opportunity to assist the Council to meet its housing and growth requirements in the Rotherham borough, not only over the life of the Core Strategy, but also beyond the plan period.

Key steps have already been taken by our client to date including the promotion of the Enterprise Zone status at Waverley, with the Sheffield City Region now rated the number 1 Enterprise Zone for Modern Manufacturing and Technology in the UK. Waverley AMP was chosen as the location for a large part of the Sheffield City Region enterprise zone as it demonstrated that it is the region's centrepiece for advanced manufacturing and engineering innovation with the potential to deliver significant accelerated economic growth and access to job opportunities across a wide geographic area. Our client is now working with the Council and key stakeholders to accelerate development of the enterprise zone at the AMP. Together they are able to deliver high quality expansion, relocation or consolidation solutions to meet the business requirements of local, regional and national modern manufacturing occupiers acting as a catalyst for the regeneration of the wider Sheffield City Region.

Inspectors Questions

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

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?

The Core Strategy seeks to define a spatial planning framework for Rotherham to 2028. The Core Strategy is anticipated to be adopted in 2014 (according to the Council's Local Development Scheme) and this therefore only covers a 14 year period, which given the extent of development envisaged is not considered to be sufficient to deliver the requirements of the Core Strategy.

Paragraph 157 of the NPPF states that local plans should be drawn up over an appropriate time frame, preferably 15 years to take account of longer term requirements, at the very least the plan period needs therefore to extend beyond 2028 to provide 15 years from the date of adoption.
Notwithstanding this, our client believes that applying a longer time period for the Core Strategy will provide greater flexibility for the plan to be able to deal with changing circumstances. Our client also notes that as part of this, consideration should be given to the timescales for the preparation and adoption of other DPDs i.e. the Sites and Policies DPD, which is only at a relatively early stage (with adoption not anticipated until July 2015). This further rises to uncertainty to delivering the policies of the Core Strategy within the plan period. Furthermore, it is the Council’s intention to defer major elements of the plan to the Sites and Policies DPD, including the identification of sites, phasing and review of the Green Belt, and therefore the timeframe will be further reduced.

In order to enable the production of the appropriate suite of documents to deliver the policies set out in the Core Strategy we therefore recommend that the plan period be extended to 2031 (a 17 year period).

1.8 Has the Core Strategy been positively prepared and is so, in which ways? Subject to more detailed discussions with regard to housing, employment and retail, does it fully meet 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?

The Core Strategy does not provide sufficient flexibility to adapt to change in respect of our client’s site at Waverley. The consequences of which could lead to delays to much needed development and delivery of growth requirements. This issue is discussed further in our representations relating to Matter 5.

1.10 Have exceptional circumstances been demonstrated to justify any alterations to Green Belt boundaries? Is the matter adequately considered in the Core Strategy, or is too much reliance 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?

There is a real need for a review of the Green Belt, to accommodate the scale of housing and employment growth identified in Policy CS6 and Policy CS9. The Council will need to release Green Belt land for development in sustainable locations to accommodate its planned growth.
The number of new homes and employment growth required and the evidence demonstrating a lack of available land constitute very special circumstances for a Green Belt release.

Policy CS4 sets out those locations where the broad extent of changes to the Green Belt will be considered, which includes Principal Settlements for Growth. It is not clear why the Council proposes to limit the locations for changes to Green Belt. Notwithstanding this, on the basis that it is considered that Waverley should be identified as a Principal Settlement for Growth (see comments below under 1.18), our client, a major land owner within Rotherham, with a significant land interest in the Borough including Green Belt land at Waverley, would welcome the Council’s proposal to review Green Belt land at Principal Settlements for Growth. However, this is only on the basis that Waverley is identified as such a settlement. Otherwise, it is considered that Policy CS4 should allow for changes to be made to the Green Belt throughout the Borough. In this instance, Policy CS4 should be amended to include the suggestion set out in the Council’s ‘Strategic Green Belt Review’ (April 2012) that the Sites and Policies DPD will identify the precise areas of Green Belt that can be developed including ‘but not limited to’ the broad locations of growth.

It is noted that the Council intends to ensure the phasing policies promote the re-use of existing urban land prior to any release of Green Belt land. This approach is supported by our client and is in line with national policy.

Paragraph 5.2.75 identifies that in some locations in Rotherham the existing Green Belt boundary is not logical and does not follow identifiable features on the ground, therefore it is considered appropriate to make minor alterations to remove irregularities and take account of circumstances on the ground. Notwithstanding our comments above, further to Harworth Estates’ previous representations on this matter in relation to the need to make a minor alteration at the Waverley site to provide a defensible boundary, our client welcomes this proposition.

Paragraph 5.2.11 states that a Strategic Green Belt review has been undertaken of all Green Belt in the Borough, whilst paragraph 5.2.41 suggests that consideration has only been given to areas of search in the urban fringe. It is our understanding that whilst an initial review was undertaken of the urban fringe, this was subsequently extended to the entire Green Belt within Rotherham and therefore paragraph 5.2.41 should be amended to reflect this.
Please note that our client does not agree with the Green Belt assessment that has been undertaken by the Council in respect of its landholdings at Waverley and intends to make further representations on this basis in relation to the Sites and Policies DPD.

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

Our client supports the principal of the identification of safeguarded land however considers that the broad areas of search for safeguarded land have not been sufficiently justified. In particular it is considered that land at Waverley should be identified as a broad area of search. We note that it would do in any event if correctly identified as a Principal Settlement for Growth.

We refer to our previous comments above in respect of the plan period and suggest that safeguarded land should be identified to meet longer term development needs beyond the plan period, until at least 2037, not 2033. Policy CS5 should be amended accordingly and additional Green Belt land identified for release.

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 proposed identification of Waverley as a ‘Local Centre’ within the settlement hierarchy does not match its strategic importance and status.

The draft Sites and Policies DPD refers to the Core Strategy ‘Broad Locations of Growth’ and refers to 2 broad locations for growth; Bassingthorpe Farm and Dinnington East. It then refers to Waverley and the fact that significant growth is proposed at Bassingthorpe Farm and Waverley and that these areas are essential to delivering the Borough’s strategy for new development.

Table 3 ‘Settlement Hierarchy and Growth Strategy’ associated with Policy CS1 of the Core Strategy demonstrates that Waverley has by far the highest percentage of both new housing (17%) and new employment (19%) development after the Rotherham Urban Area. Yet it is situated much further down the settlement hierarchy than areas with lower levels of proposed housing and employment. Our client strongly objects to this on the basis that it is not justified. There is recognition in the Core Strategy (e.g. within the Vision) of Waverley’s strategic importance and the considerable development that will take place at Waverley and it should therefore also be rightly recognised as such within the settlement
hierarchy for future development. Waverley is absolutely key to achieving the new investment and development required to deliver the Core Strategy’s Spatial Strategy and will provide the most significant levels of housing and employment development of all of the identified locations within the settlement hierarchy. Paragraph 5.2.28 refers to the fact that ‘significant growth is proposed to take place at Waverley.’ Accordingly it is considered that the Key Diagram, Policy CS1, Maps 3 and 4 should all identify Waverley as a Principal Settlement for Growth and not simply a Local Centre.

We provide further comments in our representations in Matter 5 in respect of retail hierarchy.

1.19 Are the proposed measures to tackle climate change justified, effective and adequately in line with the policy in the Framework of meeting the challenge of climate change, flooding and coastal change? In particular:
   a) Does the Core Strategy set enough and sufficiently specific targets, for example in respect of sustainable building requirements?
   b) Are its climate change measures, clear, effective and adequately justified?

Policy CS30 sets carbon compliance and renewable energy/carbon dioxide reduction requirements for residential and non residential development. The impact of the proposed measures when considered alongside other requirements will seriously undermine the viability of development. The Council’s ‘Whole Plan Viability Study’ published in May 2013, demonstrates that when the full costs (£13,000 per house plus 25% affordable housing) of all Core Strategy policies are applied, there are significant viability issues. The Viability Study demonstrates that where 25% affordable housing is secured there is very little balance left to support other policy requirements. Accordingly, it is considered that the Council should rely on the nationally prescribed building/sustainability requirements rather than setting more stringent local policies.

Our client also notes the advice set out in the Viability Study that it is important that sites included in the first five years of the plan need to be in locations where developers can build without the need for high infrastructure costs and in areas where they can readily sell. Our client is acutely aware of this issue in respect of the Waverley site and it is critical that the Core Strategy, subsequent Site and Policies DPD and CIL do not introduce onerous and overburdensome requirements upon developers that would stall the current development momentum at Waverley due to viability issues. Flexibility must be provided within both the Core Strategy and the forthcoming Sites and Policies DPDs in respect of viability issues. All of sites (except one) assessed within the Viability Study that are
currently being delivered i.e. built out (including Waverley) are providing between 7.5%-15% affordable housing, significantly less than the Core Strategy requirement of 25%. Furthermore, S.106 contributions range between £300-£3,600 per dwelling, significantly less than the proposed £13,000 per dwelling cost requirements of the Core Strategy. This sends a clear signal that housing sites will only continue to come forward if the Council is flexible with regard to its targets on sustainable building requirements and climate change measures as well as other policy requirements.