Rotherham Core Strategy Examination

Rotherham Metropolitan Borough Council

Statement in response to Matter 1: Requirements, Vision, Strategy, Objectives and Sustainability

September 2013
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?

Q1.1 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 evidence is there in the Core Strategy of the effectiveness of that co-operation?

1. The Statement of Co-operation (RSD/12) sets out how the Council has met its Duty to Co-operate requirements, including meetings with adjoining local and county councils. It summarises agreed positions including a memorandum of understanding between Sheffield and Rotherham Council’s in respect of the housing requirement. The Council’s response to the Inspector’s letter of clarification (ED/10) sets out in more detail the outcomes of this co-operation.

2. The Council believe that these show how the Council has met its responsibilities under the Duty to Co-operate. It considers that relevant bodies have been given adequate opportunity to influence the plan, that meaningful discussions have taken place and that the process of engagement has resulted in meaningful changes to the Core Strategy policies and supporting text.

Q1.2 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?

3. In preparing the Core Strategy the Council has not sought to accommodate any of its requirements outside of the borough, nor has it been asked by any other Authority to accommodate any need. The Council has undertaken considerable discussion with Sheffield City Council with regard to the housing requirement. The City Council have not formally requested that Rotherham accommodate any of its need. The City Council did object to the Publication Core Strategy due to a concern that Sheffield’s adopted housing requirement figure was the same as that in the RSS and the RSS implied that some of Sheffield’s housing need (though an unspecified amount) would be met in Rotherham. Sheffield’s concern was that the housing requirement proposed in the Core Strategy would not enable the RSS target to be met across the strategic housing market area as a whole. However the RSS was revoked by Government in February 2013 (NEB/12). Subsequent discussion has resulted in the Memorandum of Understanding (RSD/12, appendix 23) and accompanying technical paper (RSD/14) which sets out how Rotherham’s Core Strategy is proposed to be amended to improve flexibility. This has enabled the City Council to withdraw all of its objections to the Publication Core Strategy (RSD/12; appendix 21).
4. The Statement of Co-operation and letter ED/10 show how the Council has acted in relation to co-operation and ‘being a good neighbour’.

**Q1.3 Are all cross-boundary issues satisfactorily addressed?**

5. The Statement of Co-operation (RSD/12) demonstrates that the Council has sought to identify and address relevant cross boundary issues. Chapter 4 of the Core Strategy addresses cross boundary issues (RSD/1; paragraphs 4.3.13 and 4.3.14). Changes made to the Core Strategy at previous stages of preparation, in conjunction with the Focused Changes and the submitted schedule of additional proposed changes are considered to satisfactorily address concerns raised.

**Q1.4 Is the plan period, 2013-2028, the most appropriate one? Should it be longer? Should it be unspecified, i.e the next 15 years?**

6. In its Focused Changes consultation (RSD/2) the Council proposed amending the Core Strategy to refer to an unspecified 15 year period from adoption. However in light of representations received the Council concurred that a specified 15 year period provided greater certainty and clarity, and a more appropriate basis for implementing plan policies (in particular those related to housing). The Council therefore considers that the plan period of 15 years from 2013 is most appropriate and in conformity with paragraph 157 of the NPPF (NEB/1a) which requires Local Plans to be “…drawn up over an appropriate time scale, preferably a 15-year time horizon…”

7. In relation to the above, the Council considers the changes introduced in the Focused Changes remain appropriate; however in its submitted Schedule Of Additional Proposed Changes (RSD/10) APC1 proposes an addition to the wording of paragraph 1.0.1 to clarify that the Core Strategy plan period is 2013–2028.

**Q1.5 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?**

8. Chapter 2 of the Core Strategy (RSD/1) provides an appropriate spatial portrait of the borough. The issues, challenges and opportunities at chapter 3 have been identified through Core Strategy preparation and amended in light of consultation responses. The Council believes that these provide an appropriate basis for the objectives and subsequent policies.

9. Rotherham’s settlement pattern has been taken into account in determining the hierarchy for growth. The South Yorkshire Settlement Study (LEB/10 & LEB/11) initially considered the suitability (and sustainability) of settlements to accept further change, and this has been enhanced by further evidence base work in relation to the Core Strategy and the Sites and Policies document (such as the Settlement Capacity Report in 2009 (CSP/29) and the Sites and Policies Issues and Options document (CSP/13)). The Core Strategy hierarchy and strategy have been established through previous consultation, and the
distribution of development is broadly supported by the latest draft Sites and Policies document (CSP/44).

Q1.6 Subject to discussions in more detail at subsequent Hearings, is the vision for the Borough and the 17 Strategic Objectives realistic and achievable?

10. Yes – the vision, objectives and policies have been developed throughout the preparation process and respond to the challenges and opportunities facing the borough over the plan period. Table 2 (RSD/1; page 30) provides a clear link between issues, objectives and the policies which will assist in achieving the vision and objectives. Supporting text to each policy sets out how they will be delivered and ongoing monitoring of the Plan (as set out in chapter 6) will allow progress to be monitored. This approach will allow the reconsideration of policies and their success in achieving the objectives throughout the plan period.

11. The above is supported by the Integrated Impact Assessment (RSD/3a). In particular chapter 5 considers options and policy development; section 5.8 sets out the reasons for the choice of Broad Locations for Growth and section 9 provides an assessment of the spatial strategy and settlement hierarchy. Chapters 6 to 20 assess the Core Strategy in terms of a range of topics.

Q1.7 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?

12. The Core Strategy has been prepared in light of the NPPF (NEB/1a and NEB/1b) which was introduced in March 2012. The Publication Core Strategy in June 2012 took account of the newly introduced national planning policy and the PAS NPPF checklist (CSP/46) was completed in July 2012, showing how the Core Strategy accords with the Framework. The Core Strategy has been amended in light of representations received at Publication stage to improve compliance with national policy; for example Focused Changes 47 and 84 amend Policies CS3 and CS12 respectively (RSD/2) enhance alignment with national planning policy. As such it is considered that the timescale for the preparation of the Core Strategy has had sufficient regard to the NPPF.

Q1.8 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?

13. The Core Strategy has been positively prepared and the Council considers that, as addressed in more detail in relation to other matters, it meets objectively assessed needs. This is demonstrated via the robust evidence base, in particular:

- The housing and economic growth background paper (KSD/7)
• The Strategic Housing Market Assessment 2007 and 2010 update (LEB/14 and LEB/15)
• Technical Note for Memorandum of Understanding between Rotherham Metropolitan Borough Council and Sheffield City Council (RSD/14)
• The Employment Land Review 2010 (LEB/9)
• Rotherham Retail & Leisure Studies 2010 and 2011 (LEB/18 & LEB/19)
• Retail and Town Centre Advice November 2012 (LEB/20)
• Statement of Co-operation (RSD/12)

14. Focused Change 147 (RSD/2) suggests an addition to the text of the Monitoring section of the Core Strategy dealing with flexibility; it is considered that this sets out appropriately how the Core Strategy provides flexibility to deal with changing circumstances.

**Q1.9 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?**

15. Rotherham has a number of environmental features that are a constraint to development:
- Designated nature conservation sites include 6 Sites of Special Scientific Interest and 7 Local Nature Reserves;
- 93 Local Wildlife Sites and 26 Regionally Important Geological Sites that are non-statutory but are protected within the planning system.
- urban green space, country parks and agricultural land.
- waterbodies and rivers and their floodplains
- Areas of High Landscape Value
- previous mining activity can still be seen, although areas of physical regeneration and landscape renewal are found.
- signs of Protected species have been recorded in the borough; Rotherham Biological Records Centre holds wildlife data for the entire borough and forms parts of the environmental evidence base

16. The Publication Core Strategy (RSD/1) Policies CS3 and CS20 set out how the loss of higher quality agricultural land will be minimised, in compliance with the Framework. CS3 relates to considerations to be given to the selection of development sites and phasing, stating that loss will be minimised. CS20 outlines measures for the conservation of Rotherham’s natural environment including soil as an essentially non-renewable environmental component.

17. On 17 July the Government launched consultation on the proposed route for phase 2 of the High Speed 2 (HS2) line. This passes through Rotherham and if it proceeds would represent a constraint to development. Additional Proposed Changes APC9 and APC10 (RSD/10) set out how the Council proposes to amend the Core Strategy to take account of the proposed HS2 line.
Q1.10 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?

18. Evidence base work demonstrates that a Green Belt review is essential to meet its housing and employment needs in the Borough. The Core Strategy (RSD/1; paragraph 5.2.10) clarifies that whilst there is undeveloped land available within the built up areas of settlements of the Borough, this is insufficient to meet the identified development targets. Paragraph 5.2.9 referenced the evidence base work the Council has undertaken to assess the relative potential of over 650 sites to meet future sustainable development needs.

19. Taken together the sustainability assessment of potential sites and Strategic Green Belt Review (LEB/16) demonstrate a lack of suitable land and sites to meet identified development needs within settlement boundaries. Paragraph 5.2.14 clarifies that the Council will undertake a detailed review of the boundaries of the Green Belt to accompany the Sites and Policies Document.

20. The Council considered that it needed to identify the potential areas where changes to the Green Belt boundary could be required within the Core Strategy. Focused Change 51 (RSD/2) clarifies that consideration will be given to a limited review of the Green Belt in other locations, as necessary, to deliver the spatial growth strategy established in policy CS1 and to ensure the long-term sustainability of all communities.

21. The Council does not consider that it has placed too much reliance on the Sites and Policies Document, and is preparing its Local Plan as a Core Strategy and Sites and Policies Document as outlined in the adopted Local Development Scheme (KSD/2). In the knowledge that the Council will be required to complete a Green Belt Review and amend the Green Belt boundary the Council progressed the identification of the site allocations in parallel with its Core Strategy. Consultation on all potential sites in the Sites and Policies Issues and Options document (June 2011; CSP/13), was undertaken in 2011 alongside the draft Core Strategy (June 2011; CSP/11), and again through a further draft of the emerging Sites and Policies Document (CSP/44) in 2013.

22. The Council prepared a site selection methodology to aid the identification of the preferred allocations and its Integrated Impact Assessment includes the Sustainability Appraisal of all potential development sites (CSP/45).

23. Paragraph 5.2.41 is not considered contradictory to paragraph 5.2.11. As noted in paragraph 5.2.14 and Policy CS4, a further comprehensive review of the boundaries of the Green Belt will be undertaken. However in the context the discussion around the selection of the broad locations for growth,
paragraph 5.2.41 refers to areas of search for alternative urban extensions on the urban fringes of settlements not just Rotherham Urban Area.

**Q1.11 Are the proposals for safeguarded land justified, with particular regard to the areas of search?**

24. Safeguarded land allows for the possibility of development to be considered in the longer term without disrupting Green Belt boundaries. The Council considers that its approach to safeguarded land is appropriate, justified, and consistent with guidance in the NPPF (NEB/1a; paragraph 85).

25. Focused Change 56 (RSD/2) proposes that in addition to the Broad Areas of Search set out in Policy CS5 consideration may need to be given to identifying safeguarded land in other locations to provide a defensible Green Belt boundary throughout the Borough, beyond the Plan period. This policy as amended provides an appropriate and flexible approach to the identification of Safeguarded Land.

**Q1.12 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?**

26. The Integrated Impact Assessment (RSD/3) assessed reasonable alternative options that were known at that time. Section 5.1 and table 5-1 summarise the comparison of the Core Strategy objectives against the Integrated Impact Assessment Objectives. The Sustainability Appraisal process identified and recommended at each stage of iteration changes to objectives / policy to inform future policy development. The Integrated Impact Assessment considered options and policy development before considering each policy area in detail and presenting the resulting information as a series of Topic Papers.

27. Section 5.9 assessed the key social, economic and environmental features and constraints of different areas based on the Settlement Hierarchy proposed in policy CS1.

28. Section 21 of the Integrated Impact Assessment provides over-arching conclusions and table 21-1 Summary of ‘likely significant effects’ of the Core Strategy provides an outline summary of potential impacts. These are the key risks which should be monitored and managed and the opportunities which should be secured throughout its implementation. The ‘likely’ significant effects are overall considered to be positive for many topics in the long term, but the assessment recognises the risks of negative effects.

29. The Council has incorporated the results of its Sustainability Appraisal / Integrated Impact Assessment in all further drafts of its Core Strategy to minimise negative long term effects and manage these effects to achieve the economic, social and environmental objectives of its Core Strategy in a sustainable way.
30. Section 5 and appendices C and D of the Integrated Impact Assessment assess the reasonable alternatives to the Broad Locations for Growth identified in policy CS1. In section 5 and Appendix D the Council considers each alternative broad location for growth; whilst the IIA concluded that all of the alternative broad locations were potentially viable options, in planning terms not all of them would respect the spatial strategy and settlement hierarchy reference to Table 5-8: ‘Summary of Rationale for Discarding or Selecting Broad Locations for Growth Options’ provides the detailed summary.

Q1.13 How relevant to the Core Strategy is survey material which informed the Regional Strategy?

31. The Yorkshire and Humber Plan (Regional Spatial Strategy to 2026) (REB/1) was revoked by the Secretary of State in 2013 (NEB/12). Several key elements of the Regional Strategy (RS) informed early drafts of the Core Strategy.

32. The settlement hierarchy and growth distribution was initially informed by the RS and its supporting evidence on regional settlement capacity. The RS identified Rotherham as a sub regional town and Dinnington as a Principal Town (REB/1 – Policies YH4 and YH5). These were to be the main focus for growth. Subsequent local evidence on settlement capacity and sustainable patterns of growth led to this approach being broadened out to encompass additional broad locations for growth (LEB/10a, LEB/10b, LEB/11a, LEB/11b, CSP/9, CSP/29a, and CSP/29b). This is reflected in the Core Strategy’s settlement hierarchy and growth strategy (RSD/1 – Policy CS1 and supporting text). The Council considers that with the revocation of the RS and the detailed local evidence base on settlement capacity produced to support the Core Strategy, the RS survey material on this topic has little relevance.

33. The regional housing target for Rotherham (REB/1 – Policy H1 and Table 12.1) was largely based on the ONS 2004-based population and household projections. Since then, the population and household projections for Rotherham have been updated several times culminating in the latest DCLG interim 2011-based figures. This and other more up to date evidence base regarding the local housing target for Rotherham is fully addressed in response to Matter 3. As such it is considered that the regional housing target for Rotherham set out in RS is no longer relevant.

34. Similarly the regional guidance on employment land requirements for Rotherham (REB/1 – Policy E3 and Table 11.3) has been superseded by more up to date local evidence through the Employment Land Review (LEB/9), and the Economy and Retail Background Paper (CSP/6).

35. A minerals apportionment for South Yorkshire was set out in RS (REB/1 – Policy ENV4 and Table 10.1, REB/18). The Council took account of this regional evidence in the absence of any more up to date data when the Core Strategy was drafted. Subsequent work with Doncaster has produced a draft Local Aggregate Assessment (LEB/40) which has provided more up to date data on the sub-regional apportionment for crushed rock. As detailed in response to Q7.4 it is proposed to amend the Core Strategy to take account of
this new data and as such it is considered that the RS evidence base has been superseded.

36. Policy CS30 (RSD/1) was informed by the Low Carbon and Renewable Energy Capacity in Yorkshire and Humber study (REB/24). This evidence was supplemented and expanded by the Rotherham Low Carbon and Renewable Energy Study (LEB/23). The regional evidence therefore still has some bearing on this aspect of the Core Strategy.

**Q1.14 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?**

37. The Core Strategy presents a clear vision for development within Rotherham, as summarised in the key diagram (RSD/1; map 3, page 40). Policy CS1 sets out how housing, employment and retail growth will be distributed across the borough, with further detail provided in other policies (for example, Policy CS6 in terms of meeting the housing requirement, Policy CS9 in terms of economic development, Policy CS12 in terms of retail development and Policies CS14 and 16 in terms of transport).

38. The hierarchy has been determined based on capacity work and sustainability grounds, as summarised in paragraph 5.2.4 of the Core Strategy. It is also supported by the Integrated Impact Assessment (as discussed in the response to Q1.12 above). It is therefore considered that the amount and distribution of development is appropriate having regard to opportunities and constraints within Rotherham’s settlements, and that no further changes are required.

**Q1.15 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?**

39. The Council has worked in partnership with the landowners (the Council which is the minority land owner and Fitzwilliam Wentworth Estates) with support from Atlas (part of the Homes and Communities Agency) to prepare a Concept Framework (KSD/6) and supporting evidence base studies to support the Bassingthorpe Farm broad location for growth and to demonstrate its viability and deliverability.

40. Policy CS1 proposes that around 2,400 new homes will be developed on site with around 1,700 new dwellings to be built in the Plan period (up to 2028) (12% of Rotherham’s housing requirement; RSD/2 Focused Change 25) with a mix of housing tenures, types and sizes. The anticipated housing supply figure within the Plan period will be subject to further capacity and viability work. Around 11 hectares (5%) of Rotherham’s employment requirement is anticipated to be developed in this area.
41. The justification to support the broad location for growth is included within the Council’s Integrated Impact Assessment 2013 (RSD/3). Please also see the response to question 1.12. Appendix D provides the full Options Assessment of Core Strategy broad locations for growth identified in Policy CS1 and all reasonable alternatives.

42. In section 5 and Appendix D the Council considers each alternative broad location for growth; whilst the IIA concluded that all of the alternative broad locations were potentially viable options, in planning terms not all of them would respect the spatial strategy and settlement hierarchy. Table 5-8: ‘Summary of Rationale for Discarding or Selecting Broad Locations for Growth Options’ provides the detailed summary and the decision and rationale for selecting the Bassingthorpe Farm Option.

43. Briefly this is because of:
   • Rotherham Urban Area’s position in the settlement hierarchy;
   • Being in close proximity and well related to existing services, facilities and local employment opportunities offered by Rotherham Town Centre and the inner urban area.
   • opportunities to further enhance the connectivity of new development to the town centre through enhanced and new pedestrian and cycle links.
   • the size of the area offers economies of scale in bringing forward development on the site and there is support for taking the site forward from the two significant landowners in the area.

What are the Constraints to development, and how could they be reduced or overcome?

44. The Council has worked in partnership with the landowners to prepare a Concept Framework (Reference KSD/6). The purpose of which is to:
   • Demonstrate that the site is available, suitable and deliverable; to provide supporting evidence to Policy CS1 ‘Delivering Rotherham’s Spatial Strategy’;
   • Set out the Vision, planning, infrastructure and design proposals to inform further land allocations and subsequent masterplanning / design codes and future planning applications

45. It is based on a series of technical, feasibility and design studies to inform;
   • the impact of site constraints on development;
   • development capacity testing;
   • mitigation options and infrastructure requirements;
   • spatial planning proposals/urban design opportunities and heritage impact;
   • an assessment of the viability proposals and an outline delivery strategy.

46. The site is currently designated Green Belt in the adopted Unitary Development Plan (LEB/28), and is predominantly farmland and grazing land. There are a number of features of heritage interest within and immediately on the edge of the site including local wildlife site designations, ancient woodland, listed buildings and a scheduled park and garden.
Consultants undertook a number of baseline studies that support the preparation of the final Concept Framework. Section 6 provides details of the constraints to development and an assessment of the likely development capacity.

The Concept Framework also includes an assessment of the likely new requirements for local physical and social infrastructure including a drainage and waste water strategy, an assessment of open space requirements (LEB/37), transport infrastructure (KSD/8a and KSD/8b) and education and health facilities. Section 9 of the Concept Framework proposes a series of framework plans to create a single concept plan that draws everything together.

Further, consultation via a seminar with the key Sustainability Appraisal bodies was held; and with the general public through the Sites and Policies Document consultation process May – July 2013 (please see the Bassingthorpe Farm Consultation Report, CSP/47).

The most significant constraint relates to the legacy of past mining activity within the Study Area. Desk top investigations have been undertaken sufficient to provide a clear understanding of the requirements any future development activity would need to resolve. This demonstrates that a variety of engineering methods would enable development to proceed on site in the future. A cost estimate for the works required has been included in the Viability Assessment (LEB/36) for the site. Further ground investigation works to fully understand these constraints are most appropriately undertaken by a developer.

A further area of concern is the inclusion of a former household refuse tip now restored to grazing land within the site boundary. Investigations are ongoing into the likely impact any leachate could have on future development and gases that are potentially associated with this former activity. Discussions are ongoing with the Council’s Environmental Health team and future development may require the use of impermeable membranes within foundations and other actions as appropriate.

The site is immediately adjacent to a chemical plant and any future development will require the Health and Safety Executive Comah Zone to be respected. The overhead transmission lines have also been considered in designing the concept plan.

These constraints and their impact on future development have all been summarised in the Bassingthorpe Farm Concept Framework (KSD/6). The Concept Framework makes clear how the constraints that affect the Study Area have been considered and are proposed to be dealt with. It is considered that there are no critical constraints that would prevent development within this broad location for growth in the future.

What are its sustainability credentials?

The Vision (KSD/6; Section 3) confirms the sustainability aspirations. Development of this site provides opportunities for:

- the provision of new social and community infrastructure
- tackling deprivation within the inner urban area
• diversified housing offer and more affordable housing opportunities.
• employment development thus contributing to its inherent sustainability and reducing the need to travel.

55. There is a requirement to provide social infrastructure to support the proposals and the Infrastructure Delivery Study 2012 (KSD/4) identifies some of this need including a new primary school, health facilities, sport and recreation facilities and green infrastructure requirements. The Council has also prepared a Whole Plan Viability Assessment (KSD/5) and these two Studies have subsequently informed the preparation of a Viability Assessment for the broad location for growth at Bassingthorpe Farm (LEB/36).

56. Table 6.4 of the Bassingthorpe Farm Viability Assessment illustrates the impact of the various policy strands including the management and maintenance of SUDS (sustainable urban drainage scheme); and for meeting low carbon objectives.

57. Section 5.7 and Appendix C of the IIA assesses each of the options for broad locations for growth and considers the importance/sensitivity of potential receptor types, locations, indicators or other features and the significance of the effect. The SA examines the baseline data and its importance; the risk or opportunity without mitigation and at the maximum scale of development on site; key assumptions and potential recommended mitigation with an assessment of the residual risk or benefit. The assessments are undertaken for each of the SA groups of indicators.

58. The Sustainability Appraisal confirms the sustainability credentials of the Bassingthorpe Farm urban extension and identifies matters where further mitigation would assist in improving the options' sustainability credentials.

**What is the basis of the estimate of 2,400 dwellings?**

59. The Concept Framework demonstrates that the Study Area can accommodate 2,400 dwellings, in total, taking account of all known constraints. As Policy CS1 shows not all of this housing will be delivered within the Plan period

**How would its development assist the regeneration of Rotherham Town Centre (see Fact Sheet 4 – CSP/17) and the objectives of Rotherham Renaissance?**

60. Fact Sheet No 4 (CSP/17) highlights the key benefits of the Bassingthorpe Farm urban extension as being its central location, close to the town centre and the heart of the main urban area. Town Team goal 2 states: “Populate the town’s centre by creating good quality living. To sustain the long term health of the town centre we want to improve existing housing stock and provide greater choice and accessibility to good quality housing.” (Table 5 of policy CS13 Transforming Rotherham’s Town Centre refers.)

61. Development at Bassingthorpe Farm can help contribute to delivering this aspiration by delivering an increase in population close to the town centre. There is greater potential that these people will use the services and facilities, helping secure existing businesses and encourage the creation of new enterprises benefitting all of those who visit the town centre. Paragraph 5.4.57 of the Core Strategy refers.
62. Paragraph 5.7.2 Bassingthorpe Farm of the Draft Core Strategy IIA report May 2011 refers and notes that Bassingthorpe Farm is within approximately 2km of Rotherham Town Centre at its furthest distance.

Q1.16 Does the pattern of development, particularly the settlement hierarchy, promote the use of sustainable modes of transport? Subject to the discussion on Monitoring and Implementation, to what extent can the Council implement the various transport proposals and expectations? Should the distribution of growth be slanted more towards Sheffield to reflect the close association of the City and the Borough?

63. The close relationship between Rotherham and Sheffield in housing market and economy terms is well documented (LEB/41 The Joint Economy of Sheffield and Rotherham, 2007; REB1 RSS Yorkshire & Humber Plan May 2008, paragraph 12.12). The Rotherham urban area, which includes the Bassingthorpe Farm broad location for growth, is in close proximity to Sheffield and will accommodate 38% of the housing requirement and 30% of the employment land requirement (RSD/1; Policy CS1). In addition the Waverley new community close to the border with Sheffield has planning permission for some 3,900 homes. We consider that the distribution of growth is appropriate having regard to the ability of settlements to accommodate change (see response to questions 1.14 and 1.17) and the relationship between Rotherham and Sheffield.

64. The vision (RSD/1; paragraph 4.1.1) aims to create self contained communities, reducing the need to travel. However where cross boundary travel takes place the borough’s existing and proposed transport infrastructure supports effective links between Rotherham and Sheffield. In addition to good highway links Rotherham enjoys regular public transport links via bus and train to Sheffield, which will be enhanced by the tram/train pilot and Bus Rapid Transit schemes identified in Policies CS16 and 17 (RSD/1). The delivery of infrastructure, including transport proposals, is addressed in response to matter 4 (in particular questions 4.10, 4.11 and 4.12).

Q1.17 Are the Core Strategy’s proposals to deliver sustainable growth clearly articulated and adequately justified? Does it adequately set out how much development is intended to happen where, when and by what means it will be delivered?

65. Policy CS1 (as amended by Focused Changes 26 & 28; RSD/2) clearly articulate how much development will be delivered in the Plan period and those settlements where sites will be allocated for future development. In preparing its growth strategy the Council has carefully considered the key principles of sustainable development, to a range of different options for levels of growth and distribution between settlements -paragraphs 5.2.2 to 5.2.5 of the explanatory text to Policy CS1 provide further information. Focused Change 33 clarifies the site selection process based on the position of the site within the settlement hierarchy. It ensures development occurs in the most sustainable allocations.
66. The Council has not prepared a detailed phasing policy to assist in delivering the site allocations during the Plan period; but points to the need to prioritise the development of the most sustainable sites (Policy CS3(a)) and the need to encourage the re-use of previously developed land (Policy CS3(b)). The detailed Review of the Green Belt is proposed to be undertaken in the emerging Sites and Policies Document.

67. The Council considers that the lead-in period for bringing a site forward for development, and the number of units expected to be delivered on many of the sites likely to be allocated, will require a prompt start from the house builders to ensure that the housing requirement target for the Borough is reached by the end of the Plan period. The Council is mindful of the need to maintain a five year supply of housing land (Policy CS6(c) refers).

68. Explanatory text to the Core Strategy policies set out how they will be delivered. The Council will work with landowners and developers to resolve any problems that emerge regarding the delivery of sites for new development through planning applications and negotiation on S106 agreements. The Council is promoting a CIL that will enable it to respond to the need for new infrastructure and to assist in the bid for additional funding resources to meet essential infrastructure requirements.

**Q1.18 Is there enough emphasis on good design, bearing in mind that it is indivisible from good planning? Are the references to design sufficient to promote or reinforce local distinctiveness and integrate new development into the natural, built and historic environment?**

69. Good design is integral to the Core Strategy’s vision and through its inclusion as a strategic objective (RSD/1; Objective 14) its value in creating safe and sustainable communities is clear. Policy CS28 reflects the specific priorities for sustainable design in Rotherham and will be applied to all new development to ensure that the principles of sustainability and sustainable design are fully considered.

70. In addition, policies have been developed in light of the specific characteristics and assets the borough has, and will contribute to ensuring that the natural and historic environment is protected and enhanced. We therefore consider that on this basis, the references to design and the built and historic environment are sufficient to promote and reinforce local distinctiveness and ensure new development is well integrated with its surroundings. Policies in the emerging Sites & Policies document (CSP/44) also specifically relate to design and the management of all new development proposals.

**Q1.19 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?**

71. Policy CS30 provides an approach, which whilst consistent with the NPPF (NEB/01a), seeks to advance the recommendations of the Zero Carbon Hubs’
proposed changes to Part L of the 2013 and 2016 Building Regulations in terms of carbon compliance (NEB/22 and NEB/21), with suitable safeguards to allow relaxation where appropriate to ensure individual development proposals remain viable.

72. This policy is supported by both regional (REB/24) and Rotherham specific (LEB/23) Low Carbon and Renewable Energy evidence base studies, allied to sustainable design (see Policy CS28) and management of the demand for travel (see Policy CS14).

73. However, the Government has recently issued for consultation “Housing Standards Review” proposals relevant to Policy CS30 (NEB/18, Chapter 5). In light of this and its proposals that, with the progressive strengthening of Building Regulations, Local Plans should avoid the need to for additional carbon compliance / on-site renewable energy production standards, it is proposed to modify Parts 2 and 3 of Policy CS30. It is now proposed to remove reference to the carbon compliance targets in Part 2 and the on-site renewable energy targets in Part 2 to be replaced instead by reference to compliance with Building Regulations. Opportunity is also taken to better reflect the energy hierarchy by modification of wording in Part 1 and re-ordering of text in final part of policy regarding landscape capacity for better reading flow. The proposed amendments are shown in appendix 1 (page 18 of this document).

74. This modified policy approach, together with the retained reference to the energy hierarchy of Part 1, and requirements to assessed developments that produce renewable energy, is considered appropriate to secure sustainable building requirements regarding energy consistent with the NPPF.

75. As explained in the introductory section of Chapter 5 (RSD/1) the Core Strategy incorporates policies relating to climate change through a number of mechanisms and topics such as: sustainable transport and reducing the need to travel (Policy CS1, CS12, CS14); the location of new development and its accessibility (Policy CS2 and Policy CS14); sustainable design and construction (e.g. CS28), renewable energy (Policy CS30), energy efficiency (Policy CS28), waste reduction (primarily in conjunction with the adopted Barnsley, Doncaster and Rotherham Joint Waste Plan – KSD/10) and flooding (Policy CS25). Tackling all these issues collectively; developing ways to monitor positive change; and mitigating against, and adapting to, climate change will be paramount in responding to the challenge.

76. A range of other policies refer to the need to take account of climate change, e.g. Policy CS19, CS20 and CS22. Action to reduce the impact of climate change is therefore a key part of the overall vision of the Core Strategy. There is no one specific policy on climate change and instead it is important to recognise the contribution the Local Plan as a whole will make to the overall reduction in greenhouse gas reductions and the mitigation of, and adaptation to, climate change. Supported by regional and local evidence base and Government guidance and policies in the NPPF, it is considered that the
climate change measures within the Local Plan are effective and adequately justified.

77. The approach to flood risk is supported by evidence within LEB/21a (SFRA) and LEB/22 (SFRA Level 2) - the latter in terms of Rotherham Town Centre. We have worked with the Environment Agency in developing a flood risk policy that is spatially specific where required and in conformity with policies in the Framework. Please also refer to the response to question 4.5.

78. The Planning Strategy would, given its geographical location, have a limited role in terms of coastal change and this is not an issue considered necessary for the Core Strategy to address.

79. Corporately, the Council also has an adopted Environment and Climate Change Strategy & Action Plan (LEB/39), last updated May 2013. The Council is also a signatory to the Local Government Association Climate Local Scheme.

Q1.20 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)?

80. Policy CS33 reflects the presumption in favour of sustainable development established in the Framework (NEB/1a). Accordingly the Council will work with applicants to secure development that improves the economic, social and environmental conditions in the area.

81. In addition, the Council is concerned (through Policy CS27) to ensure that new development does not result in an unacceptable level of air pollution to the detriment of public health and other land uses. Promoting the use of public transport, walking and cycling as alternatives to the car, will help to reduce greenhouse gas emissions and air pollution. Allied to this, the natural environment and its functioning processes will play a key role in climate change adaptation and mitigation.

82. Moving towards a low carbon economy (as promoted through CS9) will also bring benefits both in terms of addressing climate change and also presenting new opportunities for business. This includes supporting proposals which seek to deliver the Dearne Valley Eco-Vision, which envisages a transformed economy based on growing and managing natural assets and developing new low carbon infrastructure.

83. The Council and the Environment Agency have been proactive in reducing the risk of flooding which has included investing £15 million in the first phase of the Rotherham Renaissance Flood Alleviation Scheme (RRFAS) and removing physical obstructions to improve the flow of the River Don. The Council has also undertaken work to model and research how the borough is affected by flood risk.

85. Both studies looked at the range of potential sources of renewable energy and Policy CS30 reflects this as a generic policy for addressing proposals for all forms of renewable energy. The mapped distribution of the renewable energy resource in Rotherham is given in Figure 5.1 of the Rotherham Study which remains as part of the evidence base for Policy CS30 and its implementation.
Appendix 1: Proposed Modification to Policy CS30 and supporting text
(as amended by Focused Changes 134 to 144)

Proposed deletions to text as shown as strikethrough. Proposed additions to text are shown in bold underlined.

Policy CS 30

Low Carbon & Renewable Energy Generation

1 Energy
Developments should seek to reduce carbon dioxide emissions through the inclusion of mitigation measures in accordance with the following energy hierarchy:

a. Minimising energy requirements through sustainable design and construction;
   b. Incorporating renewable energy sources. Maximising Energy Efficiency;
   c. Using low carbon and renewable energy sources.

Developments will be supported which encourage the use of renewable, low carbon and decentralised energy. All development should achieve, as a minimum, the appropriate carbon compliance targets as defined in the Building Regulations.

2 Residential Development

All residential development will be required, unless this can be shown not to be feasible or viable, to achieve the following carbon compliance targets:

a. From 2013 —— All dwellings to achieve at least 14 kgCO2/m2/yr
   b. From 2016 —— Detached houses to achieve at least 10 kgCO2/m2/yr;
      Attached houses to achieve at least 11 kgCO2/m2/yr;
      Low Rise Apartment blocks to achieve at least 14 kgCO2/m2/yr.

Carbon compliance levels are applicable to the development as a whole and may be offset by allowable solutions (developer contributions). The developer may make a payment to an allowable solutions provider, who will take responsibility and liability for ensuring that allowable solutions, which may be small, medium or large scale carbon savings projects, to deliver the required emissions reductions.

3 Non Residential Development

All non-residential development of more than 1000m2 will be required, unless this can be shown not to be feasible or viable, to:

a. Provide a minimum of 10%, plus 1% uplift per annum, of their predicted energy needs on-site from renewable energy sources, in accordance with the following:

   Development Year Renewable Energy Target
   2013 10%
   2014 11%
   2015 12%
   2016 13%
   2017 14%
and

b. Generate further renewable or low carbon energy, or incorporate appropriate design measures, to reduce the development's overall predicted carbon dioxide emissions by 20% (including requirements to satisfy (a)).

Where it is not appropriate to incorporate such provisions within the development, an off-site scheme, or contribution to such may be acceptable.

4.2 Developments that produce renewable energy

Careful consideration will be given to the capacity of the landscape to accommodate renewable energy developments, the ability to mitigate visual intrusion and the cumulative impact of individual sites.

Proposals for the development of renewable and low carbon sources of energy, particularly from community owned projects, will be encouraged provided that there are no unacceptable adverse effects on:

a. Residential living conditions, amenity and quality of life
b. Character and appearance of the landscape and surrounding area
c. Biodiversity, geodiversity and water quality
d. Historical, archaeological and cultural heritage assets
e. Highway safety and infrastructure

Careful consideration will be given to the capacity of the landscape to accommodate renewable energy developments, the ability to mitigate visual intrusion and the cumulative impact of individual sites.

Any proposals will be accompanied by supporting information to clearly show how the surrounding environment will be protected and how site restoration will be carried out when production ends.

*Maximum available renewable energy resource within Rotherham Borough (after Wardell Armstrong (2011) "Rotherham Low Carbon and Renewable Energy Study").

Explanation

There is compelling evidence that greenhouse gas emissions (particularly Carbon Dioxide - CO2) from domestic, industrial and transport-related energy uses are causing climate change, and will continue to do so for decades to come. This has potentially devastating consequences to the global environment and poses a significant threat to social cohesion and economic systems.

One of the Core Planning principles set out in the National Planning Policy Framework is to support the transition to a low carbon future in a changing climate, and to encourage the reuse of existing resources and the use of renewable resources. It also indicates that planning plays a key role seeking to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.
Action to reduce the impact of climate change is therefore a key part of the overall vision of the Core Strategy and two key strands towards mitigating these impacts are through a reduction in carbon emissions and by increasing the amount of renewable energy produced. This policy, allied to sustainable design (see Policy CS28) and management of the demand for travel (see Policy CS14), will play a significant role in attaining these ambitions.

Taking account of the energy hierarchy, new buildings and conversions should in the first instance be designed and constructed to be energy efficient, in particular through using the principles of passive design, including high insulation levels, solar heating, natural lighting and ventilation, thermal mass and passive cooling.

Having achieved a reduced energy demand through energy efficient design, the second stage is to consider the use of decentralised, renewable and low or zero carbon technologies. The type of renewable energy is not prescribed but instead it is advocated that a range of technologies be explored choosing the one that gives the best environmental performance, is cost efficient and has no adverse impacts on the surrounding area.

In all cases flexibility will be exercised where viability and deliverability are critical factors, however, schemes are encouraged to seek higher standards ahead of the trajectory in this policy where viability allows. This policy aspect will be monitored closely and potentially reviewed in light of national policy and ongoing economic conditions with the underlying objective of ensuring as high a standard as possible is achieved. It is also envisaged that increased public awareness, technological advances and economies of scale will play an important role in achieving our stated aims.

When it is considered that achieving the carbon compliance and renewable energy targets is unfeasible or unviable taking account of the development as a whole, evidence should be supplied demonstrating that the range of available technologies has been explored. In such circumstances, where a sufficient case is put forward a reduced figure may be negotiated or a contribution made towards off site carbon reduction schemes in lieu of part or all of the requirement. An energy statement should be submitted with the planning application explaining the approach to energy on the development.

Two studies underpin Policy CS30:

Together the studies' conclude that Rotherham Borough has potential renewable energy resources in hydro, solar, heat pumps, biomass and energy from waste but that the most significant potential lies in commercial scale wind power - both large (55 MW Potential Electricity Resource) and medium scale (66.5MW Potential Electricity Resource).

Delivery

This policy will be delivered through the determination of planning applications, updating of building regulations and the Sites and Policies document will set out more detailed guidance.