Rotherham Core Strategy Examination

Rotherham Metropolitan Borough Council

Responses to the Main Modifications Consultation Which Were Not Duly Made

April 2014

www.rotherham.gov.uk/corestrategyexamination
1. The Council undertook consultation on behalf of the Inspector on the proposed Main Modifications to the Rotherham Core Strategy and an accompanying Integrated Impact Assessment (which considered the effect of the proposed changes on the sustainability credentials of the Core Strategy) over a 6 week period between 7 March and 17 April 2014.

2. The consultation document clearly indicated that representations should be made on the Main Modifications proposed and the accompanying Integrated Impact Assessment only. The consultation documentation included guidance notes provided to help explain the procedures. Notwithstanding this, 8 representations were received which did not specifically address the Main Modifications or Integrated Impact Assessment, or were received after the close of consultation. These are not considered to be duly made and therefore have not been accepted as representations. As such these have not been submitted to the Inspector, however copies of the responses are included in this document (as part of the examination library) for sake of transparency.

3. The responses are included at appendices 1 to 8, and the table below summarises why they have not been accepted as duly made representations.

<table>
<thead>
<tr>
<th>Appendix</th>
<th>Reason for not being duly made</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Responses do not relate to any of the proposed Main Modifications or the Integrated Impact Assessment</td>
</tr>
<tr>
<td>2</td>
<td>Response does not relate to any of the proposed Main Modifications or the Integrated Impact Assessment; full name and address details not provided</td>
</tr>
<tr>
<td>3</td>
<td>Responses do not relate to any of the proposed Main Modifications or the Integrated Impact Assessment</td>
</tr>
<tr>
<td>4</td>
<td>The response was received after the consultation deadline (envelope postmarked 17 April)</td>
</tr>
</tbody>
</table>
Dear Madam,

In reply to your letter dated the 14th March 2014 re Consultation on main modifications to the Rotherham Core Strategy, I firmly believe we must trust the Inspector to conduct this matter, selective to the area, of a parish, and not over construct the framework either homes or "green spaces" environment.

As a footnote, I wish to add as a predominantly retirement lounge area, we have gained a lot of youths in the park making a nuisance of which makes lives unbearable - please consider carefully.

Yours Sincerely,
To whom it may concern,

When it was asked to be built on green belt land in the past it was objected to, why should it be allowed now to build Private Housing and not Council Housing. Soon it will take all our greenery away. I don't think it is necessary as there is other land to be built on other than green belt land. And why should it be Ratherham everytime.

Yours
Appendix 3
BY FAX, EMAIL AND POST

For the attention of Ms B Knight
Planning Manager
Rotherham MBC
Environment & Development Services
Riverside House
Main Street
ROtherHAM
S60 1AE

Dear Bronwen

RE: CONSULTATION ON MAIN MODIFICATIONS TO THE ROTHERHAM CORE STRATEGY

I thank you for your letter of 4th March 2014. I have read the Core Strategy Main Modifications, Chapters 1 to 4. I last wrote on 27th July 2013 identifying my only concern with reference to the provision of sporting facilities for the existing and the future community created by the additional housing in the 15 year plan. On a previous visit to the Council Offices, with reference to the possibility of a move by Rotherham United to a site by the motorway at Bramley, which at the time was of interest to the Chief Executive. It was noted that the old Brecks Cricket Club Ground on Brecks Crescent was still identified as a cricket ground on the local map produced to me at that time (around 2004).

I feel as part of the Core Plan should be a Core Plan for leisure facilities which is of prime importance. This position is highlighted once again by the shared facilities at Clifton Lane between Rotherham Town Cricket Club and Rotherham Rugby Union Football Club (Titans).

We clearly have a problem now not in the next 15 years as regards the provision of sporting facilities. As regards Clifton Lane there has to be consideration of affordable housing replacing the sports ground with the Local Authority working with both Clubs to find alternative venues in Rotherham. As for cricket the Pitches and Brecks are suitable areas. At both sites a complete sporting complex could be created for a community that has not been provided with any for many years. As I understand Government Policy has changed supporting again competitive team games which every young person should have the opportunity to be involved in.

I think the Core Plan misses the main point to provide facilities for school leavers to continue competitive sports. The Leisure Centre at Herringthorpe did provide opportunities for rural Rotherham but since knocking the Leisure Centre down I do not think any resident of the Stag, Brecks, Wickersley Area use the “down town Leisure Centre” for those competitive sports that they were involved with at School.

Yours sincerely

John R Parkin
Appendix 4
Main Modifications Stage Representation Form

To be returned by: 5pm, Thursday 17 April 2014

Please read the guidance notes in the consultation document carefully before completing this response form. If you need any help or advice please contact the Planning Policy team: ● Email: planning.policy@rotherham.gov.uk ● Tel: 01709 823869

Representations will only be accepted that refer to a change shown in the Schedule of Main Modifications, or the Integrated Impact Assessment. Responses will be sent to the Planning Inspector. Please do not repeat your previous comments or re-submit your previous representations as these are already being considered by the Inspector.

This form has two parts:
Part A – Personal Details Part B – Your Representation(s).
Please copy and fill in a separate sheet for each issue / representation you wish to make

**PART A**

<table>
<thead>
<tr>
<th>Personal Details:</th>
<th>Agent’s Details (if applicable):</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title</td>
<td></td>
</tr>
<tr>
<td>First Name</td>
<td></td>
</tr>
<tr>
<td>Last Name</td>
<td></td>
</tr>
<tr>
<td>Job Title (where relevant)</td>
<td></td>
</tr>
<tr>
<td>Organisation (where applicable)</td>
<td></td>
</tr>
<tr>
<td>Address Line 1</td>
<td></td>
</tr>
<tr>
<td>Line 2</td>
<td></td>
</tr>
<tr>
<td>Line 3</td>
<td></td>
</tr>
<tr>
<td>Line 4</td>
<td></td>
</tr>
<tr>
<td>Postcode</td>
<td></td>
</tr>
<tr>
<td>Telephone</td>
<td></td>
</tr>
<tr>
<td>E-mail Address</td>
<td></td>
</tr>
</tbody>
</table>

PLEASE NOTE THAT YOU MUST PROVIDE YOUR NAME AND ADDRESS
PART B – Please use a separate sheet for each representation

Name or Organisation: ....................................................................................................................

Q1. To which Main Modification of the Core Strategy does this representation relate?  
(Comments without the relevant reference number will not be accepted)
Main Modification Number: [LD FO419]

Q2. Do you consider the Main Modification to the Core Strategy to be legally compliant?  
(please tick relevant box)
Yes [ ] No [X]

Q3. Do you consider the Main Modification to the Core Strategy to be sound?  
(please tick relevant box)
Yes [ ] No [X]

*The considerations in relation to being 'sound' and 'legally compliant' are explained in the accompanying guidance notes.

Q4. If you consider the Main Modification is 'unsound' please identify the test of soundness to which your representation relates:

Positively Prepared: [ ] Justified: [ ] Effective: [ ] Consistent with National Policy: [ ]

Q5. Please give details of why you consider the Main Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Main Modification, please also use this box to comment. (Continue on a separate sheet/expand box if necessary)

In my opinion the proposed drainage set out will not be sufficient to cope with heavy rainfall and could result in flooding, as my property backs onto the proposed site, this could seriously affect my property. As is widely forecast, climate change means more potential few periods of heavy and continual amounts of rainfall.

By leaving the field as it is, nature will allow the field to act as a natural mini soakaway thus eliminating potential flooding.
To whom it may concern

I feel as a Whiston resident of some 35 Years I feel it’s my duty to view my concerns about the building of houses on the field adjacent to graystones road and on land adjacent to woorygoose lane. The building of these dwellings I feel will only exacerbate the problem of flooding. With the problem of global warming we are being warned to expect more rainfall which in turn causes flooding. With all the water runoff from these new dwellings it’s obvious to me and I believe many other residents of Whiston this is a recipe for disaster.

I wish to share with you what I have witnessed in the past when my daughter had a horse in the field where the sewage discharge pipe is, the field adjacent to the junction of Moorehouse lane and Roydsmoor. Whenever there was a heavy downpour of rain sewage was discharged into Whiston brook which I find absolutely appalling. Every time this happened no one could put any horses or ponies in the field because of the sewage debris, this included condoms, sanitary towels, human solids, toilet paper, even hypodermic needles. We would have to ring Yorkshire water and within two hours there were people there wearing white suits face masks on cleaning the appalling mess up. Obviously to my mind they felt it was that serious a risk they had to fully suit up. I and at least four other people witnessed this between 1996 / 2000.

Whether this is still happening I wouldn’t know only people who still use the fields would know this.

As a grandfather now I had to explain to my two grandchildren why they couldn’t go dipping with their nets in the Whiston brook below the sewage outflow. Not only does it contaminate the land close to the outfall it contaminates land where ever the brook floods, which includes the beautiful Whiston/Canklow meadows which is full of wildlife including frogs, toads, newts, wildfowl and grass snakes.

I feel it is absolutely appalling and may I say criminal for this to happen. The Whiston brook yes brook not a river is a beautiful brook that the Whiston residents should be proud of and not ashamed of. Please think of the future generation and don’t build these dwellings.

Yours sincerely
Mr P Barker
Appendix 6
To whom it may concern,
I have read the recent Inspectorate report on the proposed Rotherham's Local Plan Core Strategy. I took note of the fact that no amendments had been made to the original proposal of 37 dwellings on the site of the playing field at Ryecroft. Map Ref No L.D.F.0064. I did send an E-Mail to you in the first instance. Pointing out some of the problems with this site.
It maybe that you have not picked up on some of the points or it maybe that with your work load. It may have been missed. This site does warrant investigation on the impact that it will make if this plan is adopted. With this in mind I will try to help by clarifying some of the major concerns with the proposed development.

TRAFFIC
This is an area which is mainly built up. There are quite a number of terraced houses with no facilities to park off the road. Traffic is parked on both sides of the road. Also on the pavements. This is prevalent along Clay Pit Lane and Thrybergh Hall Road. Conditions are further exasperated by heavy goods Lorries. Which have to make deliveries to local shops and a public house. When people are at home from work, on an evening or at the weekend. Then it is particularly bad. The only way through these roads is by single file traffic driving down the centre of the highway. What makes it even worse is the fact that this is a bus route.

I appreciate that there is a need for more houses in the Rotherham area. But it has to be asked if the area in which these developments are planned is feasible. This area cannot in its present state accommodate any more traffic. Some major reorganisation of the road net work needs be carried out before any consideration should be given to any building.

I would also like to point out that two previous planning applications in the area have been turned down because of the traffic problems. One was for a development on the east side of Wheatcroft Road the other for nursery on Walker View. Drainage problems exist on this site. 3years work patching this sewer, and still at it! Plus a number of environmental issues, and yes we do have a colony of bats.

Yours Sincerely

Mr D Littlewood
Shepherd, Lesley

From: angela somerset
Sent: 15 March 2014 09:57
To: Planning, Policy

I would like to register my objections to the amount of new housing proposed in Ravenfield/Bramley.

I am aware it is almost certain that the housing development on Moorlane South at Ravenfield will go ahead. The amount of extra traffic this will create in our area is frightening. Ravenfield along with Bramley has been massively over built in the last 20 years. After Woodlathes was built there was a promise of a new school only to instead, increase the capacity at the already local schools.

The traffic outside these schools is terrible. The condition of the roads at Moorland South and North is horrendous. More traffic will only make the matter worse. We have no shops in Ravenfield so any sort of shopping needs is a case jump in the car. The bus services is very poor so we have no options.

I note seeing the modifications proposed there is a proposal to bring the land to the rear of Allott close out of greenbelt. As a resident of Allott close this option seems insane. We have 36 houses on the close and each having 2 cars. The access to the plot proposed is totally inadequate and would as stated on your last consultation require another access forming to make it safe. If you double the amount of houses by building on this land I cannot imagine the amount of traffic on the close. This has always been a close where children play out as they should do. This would no longer be safe for this to happen. There is also the point of the amount of time it takes to get off the close at peak times due to the constant flow of traffic on Moor Lane North. You can be waiting 5 mins or more to get off the close.

You have allowed buildings to be erected on so many small plots in Ravenfield over the past 20 years that it is losing the village feel that it has always had. The school is no longer a village school because they have increased the capacity to over double what it was 20 years ago when my sons went there.

The houses that were built on the strata estate off Braithwell Rd were over built. If you drive onto there at night it's just like a big carpark. I think there needs to be some serious thinking before the go ahead for the increased numbers you are considering are given the go ahead.

I am fully aware that there needs to be more building to be done and that all areas have to be considered. Believe me my sons want new houses but you just build too many and build them far too small. You also need to be aware of residents when making what can be life changing decision on there behalf.

Let us have a sensible quantity and better quality with whatever is built.

Thank you

A Somerset
Appendix 8
Main Modifications Stage Representation Form

Ref: (For office use only)  
To be returned by: 5pm, Thursday 17 April 2014

Please read the guidance notes in the consultation document carefully before completing this response form. If you need any help or advice please contact the Planning Policy team:  
Email: planning.policy@rotherham.gov.uk  
Tel: 01709 823869

Representations will only be accepted that refer to a change shown in the Schedule of Main Modifications, or the Integrated Impact Assessment. Responses will be sent to the Planning Inspector. Please do not repeat your previous comments or re-submit your previous representations as these are already being considered by the inspector.

This form has two parts:  
Part A – Personal Details  
Part B – Your Representation(s).

Please copy and fill in a separate sheet for each issue/representation you wish to make

PART A

Personal Details:

Title  
Mrs

First Name  
DAWN

Last Name  
WATFORD

Agent’s Details (if applicable):

Job Title  
(where relevant)

Organisation  
(where applicable)

Address Line 1

Line 2

Line 3

Line 4

Postcode

Telephone

E-mail Address

PLEASE NOTE THAT YOU MUST PROVIDE YOUR NAME AND ADDRESS FOR YOUR COMMENTS TO BE CONSIDERED. THESE REPRESENTATIONS CANNOT BE TREATED AS CONFIDENTIAL, HOWEVER ONLY YOUR NAME AND COMMENTS WILL BE MADE PUBLIC
Completed forms should be returned by 5pm on 17th April 2014 to:

Planning Policy Team, RMBC, Riverside House, Main Street, Rotherham, S60 1AE.
E mail: planningpolicy@rotherham.gov.uk
MAIN MODIFICATIONS REPRESENTATIONS - INTRODUCTION.

Following the Core Strategy Hearings which took place in October/November last year it is noted that the Government’s Appointed Inspector (Mr Richard E Holloox) has recommended that 20 Main Modifications to the Council’s submitted Core Strategy need to be made before it can be adopted as part of Rotherham’s Local Plan (Letters ref ED75, 6 and 7 refer).

However, the Inspector has instructed that these Main Modifications etc need to be fully consulted on before the Core Strategy is amended in any way shape or form – these said Main Modifications are, inter alia, set out in full in the published Main Modifications Consultation Document, which invites representations to be submitted by 5pm on Thursday 17th April 2014.

It has been clarified with the Council today (07/04/2014) that the representation form (Part B) has been designed for 1 issue/representation per form, but where more than 1 Main Modification is being commented on 1 form can still be used as long as it is clear which comments relate to which issue. Alternatively, the Council has also confirmed that “free form” comments can be lodged as equally valid representations in lieu of the form as long as they are in E mail/Word format and that it is clear which representations relate to which issue.

Once received, the Council will then upload onto their Limehouse portal website via a “cut and paste exercise”. This will also apply to any submissions made via hard copy – ie by consultees who are not on E mail.

The Council also confirmed on 07/04/2014 (am phone call) that “Group submissions” can be made via Part A of the form (ie via the Organisation box) and then attaching a list of said “Group members” thereto – para 3.24 of the Main Modifications Consultation Document refers.

In view of all the above, I have decided to submit my representations as a trilogy of “free form” attachments – ie this Document (Main Modifications – introduction), together with Main Modifications – Part’s A and B.

In the case of the latter, please note that all representations relate to the soundness of the Core Strategy (as opposed to its Legal Compliance). In terms of its soundness, the following aspects are highlighted –

1. Positively prepared – including any unmet requirements from neighbouring Authorities.
2. Justified – including evidence of participation of the local community and research/fact finding.
3. Effective – including any national barriers to delivery and coherence with the strategies of neighbouring Authorities, and
4. Consistent with national policy – including where there is departure, LPA's must have a clear and convincing reasoning to justify their approach.

These in essence relate to –

1. Whether there is a lack of cohesion and cross boundary working with neighbouring Authorities, ie participation, research and fact-finding.
2. Whether the figures are robust and credible.
3. Whether alternatives (ie other sites) are realistic and have been correctly appraised.
4. Whether there are national planning barriers to delivery (eg Green Belt policy), and
5. Whether there is a departure from policy (ie Green Belt policy and any landscape protection policies).

Please can you notify me of the future stages in preparing the Core Strategy (by post). Finally, if further public hearing sessions are required please note that I would wish to participate in the oral part of the examination.

From: (signed )

Date: 15/04/2014.

To: planning.policy@rotherham.gov.uk,

Cc: ryan.shepherd@rotherham.gov.uk, Kerry.trueman@rotherham.gov.uk
MAIN MODIFICATIONS – Part B.

1. MM1 – (re CS34: Housing Delivery and ongoing co-operation). It is agreed that a Strategic Housing Market Assessment for Rotherham’s housing market area be completed by December 2014, and also co-operate in the production of a joint Strategic Housing Market Assessment for entire housing market area (ie South Yorkshire?) BUT outcome should not be prejudged vis a vis the number of new homes now stated to be required (17,133) – outcome of SHMA may conclude that additional housing provision as stated in CS6 not necessary. Rotherham’s house prices are not high or excessive, pro rata, which indicates that supply is not short. Tenanted availability in the private sector is readily available as well but public sector is however another matter. If anything, there is a shortage of smaller sized accommodation in the existing built up areas, which should be added to by converting unused/underused accommodation in the Town Centres and other social housing areas.

2. MM2 – (re Policy CS1: delivering Rotherham’s Spatial Strategy). Re map x – Strategic Allocation Policies Map, it is shown that housing within Rotherham Urban Area should be 5,300 over the Plan period (excluding Bassingthorpe Farm). Given 1,700 for Bassingthorpe Farm plus 2,500 at Waverley and 1,540 at Dinnington, this 5,300 NOT proportionate. Even allowing for better use of existing unused/under used land and buildings in and around the Town Centre, the load should be more evenly/fairly spread throughout the whole Borough in the interests of fair play. Instead, more houses should be erected at sites such as Maltby Colliery (brown field) and Thorpe Hesley (land off Brook Hill and Wentworth Road which has had a residential allocation on it since 1972). The regeneration of the Town Centre is the single most important issue “on the table” and building new homes around the edges, on green field land, hinders rather than helps this.

3. MM3 – (re Policy CS6 – 17,133 new homes, ie 850 homes pa plus 4,383 shortfall from 2004 “backlog” position under Regional Strategy). Please see comments made in MM1 above but notwithstanding, all brown field land should be used first before green belt land is even considered for release. At Prime Minister’s Question time (week beginning 3rd March 2014), The Prime Minister stated that the National Planning Framework, as well as containing protections for the Green Belt, “insists on going ahead with brown field developments”. In a letter to Kevin Barron MP for Rother valley from Nick Bowles MP Parliamentary Under Secretary of State in the Department for Communities and Local Government, dated 7th March 2014 it was stated that “local Councils can set their own targets for prioritising development on brown field land if this is the best approach locally”. Therefore this phased approach to sites should remain in the Plan, and a common sense order of any new sustainable housing for Rotherham should be as follows:

a)All land and buildings with an existing planning permission in place.
b) All brown field land, eg Waverley, Maltby Colliery.
c) Vacant/unused/under used land.
d) Windfalls – eg building plots in large gardens.
e) Land already zoned residential eg land at Thorpe Hesley (since 1972).
f) Vacant unused or under used green field land.
g) Agricultural land (lowest grade first through to highest grade last).
h) Agricultural land in areas of High Landscape Value (HLV).
i) Agricultural land in the Green belt.
j) Agricultural land in both the Green Belt and in areas of HLV.
k) Sites of Special Scientific Interest, designated natural history sites and sites in a designated flood plain area.

4. MM4, (Policy CS3 – Sustainability criteria). It is agreed that ALL new development should be sustainable, but what is meant by sustainable development? Sustain usually means to maintain, support or even endure. Sustainability usually relates to human sustainability on planet earth. I assume that sustainable development is defined as development that meets the needs of the present without compromising the ability of future generations to meet their own needs (pp the Bruntland Commission of the UN 20/03/1987). On this basis it is clearly NOT sustainable to abandon existing built up areas in lieu of building in the countryside, especially on Green Belt land. It is certainly not sustainable to build on Green Belt land which is also arable land in an area of High Landscape Value.

5. MM7, (Policy CS4 – Green Belt). It is stated in Main Modifications consultation Document that land within Rotherham’s Green Belt will be protected from inappropriate development, as set out in National Policy. Council document ED81 (the Draft Schedule of Minor Modifications) states at MIN23 that the Core Strategy is promoting a localised review of the Green Belt, the boundaries to which will be determined in the emerging Sites and Policies Document. MIN23 does however go on to say that ‘... to meet the locally derived housing and employment land targets there is a need to release a number of sites that are green field and designated Green Belt in the Unitary Development Plan’. MIN27 goes onto state ‘... Development in the Green Belt will be managed and controlled through determining planning applications. The National Planning Policy Framework makes it clear that most types of development in the Green Belt are inappropriate and can only be permitted in very special circumstances. Development Management Policies in the Sites and Policies Document will set out the types of use which can be considered
in the Green Belt and the criteria which must be met. The Borough's Green Belt will be maintained through the appropriate allocation of land to meet future development needs and the designation of the Green Belt as set out in map x and on the Policies Maps that form part of the Sites and Policies document. At this juncture it makes sense to look at the 2012 Green Belt Review document – this document highlights 4 main reasons for the Green Belt (which are: 1. To check the unrestricted sprawl of large built up areas, 2. To prevent neighbouring towns from merging into one another, 3. To assist in safeguarding the countryside from encroachment and 4. To preserve the setting and special character of historic towns. IF therefore any Green Belt land is required to be re-used for development purposes (ie only after all other classifications of land have been first exhausted, ie brownfield land first, then under used/vacant land and buildings etc etc as in para 3 above) then the criteria as listed in Appendices 4, 5 and 6 to the Green Belt Review should be strictly adhered to (in particular re Appendix 4, use sites identified as 'slight/negligible' first before considering those having a 'moderate' contribution to the above listed purposes of the Green Belt). In that way, any Green Belt re-use will be kept to a minimum – after all Green Belts were created for very good reasons, and National Planning Policy has not "watered down" the philosophy of them, to the point where they can be dismantled at will for the sake of developer's profit at the expense of community's contrary desires.

Signed

Dated: 15/04/2014.