



Our Ref: General 40b – Planning Conformity/final responses/local development frameworks/Rotherham,  
Core Strategy, Revised Options, August 09

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Dear Paul

### **Rotherham Local Development Framework– Core Strategy Revised Options**

The Regional Planning Body (RPB) welcomes the opportunity to comment on the Rotherham Core Strategy – Revised Options Consultation document and to continue its involvement in the development of a coherent spatial planning framework for the region. The comments offered in this letter are intended to be within the spirit of continued and productive joint working.

At this stage, the RPB's response to the consultation document is a set of comments aimed at highlighting where issues related to general conformity with the Regional Spatial Strategy might arise. When the DPD is published prior to being submitted to the Secretary of State a formal RPB view on its general conformity with the Regional Spatial Strategy will need to be requested (Regulation 29, 2008).

The following comments are made in relation to the current RSS – The Yorkshire and Humber Plan, which was issued by the Secretary of State in May 2008. The Yorkshire and Humber Plan aims to achieve a more sustainable pattern and form of development, investment and activity across the region, putting a greater emphasis on matching needs across the region with opportunities and managing the environment as a key resource. There is a particular emphasis on achieving the regeneration and renaissance of the region's city and town centres by making them the focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region.

## Previous Correspondence

The RPB sent a number of officer comments in response to the Core Strategy Preferred Options document on 21 March 2007. In this response we highlighted some key issues to take into account:

- Concerns over the proposed settlement hierarchy, as it failed to outline the level and type of appropriate development for each of the settlements.
- There was a need for housing figures to be expressed in net and gross figures in relation to RSS.
- There was a need for clarification with regard to housing figures in the submission version of the Core Strategy document.
- Concerns were expressed over Rotherham's proposal for higher housing figures to draft RSS (2005).
- There was a lack of sufficient reference to the importance of housing mix and affordability.

As you will be aware these comments were made in relation to the then current Regional Spatial Strategy (based on the selective review of RPG12 issued in December 2004) and the draft Regional Spatial Strategy – the Yorkshire and Humber Plan (December 2005). This response will set out officer comments in relation to the current RSS – The Yorkshire and Humber Plan, which was issued by the Secretary of State in May 2008.

## Key Points on the Core Strategy: Revised Further Options

Below is a summary of the main points the RPB wishes to raise with regards to the Core Strategy: Revised Options Consultation document. **Annex A** provides further detail for each of these issues.

1. It would be helpful to set out the requirement for the Core Strategy to be in general conformity with the RSS.
2. The RSS provides a useful context for Rotherham's development through its sub-area policies. We suggest the Core Strategy should reflect and set out the relationship that Rotherham has with the rest of the South Yorkshire sub area.
3. The RPB is encouraged that the Revised Options document states that more attention will be given to green infrastructure and infrastructure delivery.
4. The document includes welcome reference to housing targets as set out in RSS (2008).
5. The RPB is encouraged that further work has been carried out to refine employment land requirements to the end of the LDF period in 2026.
6. Local evidence will need to be provided to support why the regional PDL target cannot be met.
7. We welcome the proposed settlement hierarchy but have some concerns about the possible low level of focus on Rotherham Main Urban Area compared to projected need.
8. We feel that it would be helpful if a more rational approach was applied to express what different spatial choices mean in terms of numbers and capacity.
9. It would be useful for the document to explain how the spatial choices reflect economic linkages/relationships with areas outside the Borough such as Doncaster, Sheffield and the East Midlands.

10. It would be helpful if reference was made to emphasise the importance of housing mix and affordability.

I trust that the comments provided here, and expanded on in Annex A, are helpful to you as you continue to prepare the Core Strategy for submission. Clearly we wish to see the Core Strategy developing in general conformity with the Regional Spatial Strategy. Please do not hesitate to get in touch if anything is not clear. We look forward to working with you further on your Core Strategy and to commenting on the final document in due course.

Yours sincerely



Jenny Poxon  
Head of Service, Planning Delivery and Conformity

**Please note:** from 1 April 2009 officers supporting the work of the Joint Regional Board, the new Regional Planning Body, will work in LGYH; please amend your contact databases accordingly

## **Annex A**

### General Comments

As you know, the Planning and Compulsory Purchase Act 2004 introduced mechanisms to help ensure that Development Plan Documents (DPDs) drawn up by local authorities as part of the Local Development Framework (LDF) are in general conformity with the Regional Spatial Strategy (RSS). The intention is to ensure that DPDs are contributing to the delivery of the RSS and that the two strands of the Development Plan for an area (the RSS and DPDs) are mutually supportive and not in conflict. The RSS (2008) has an important role in providing a strategic policy context for local policies. Therefore it would be helpful for the need for there to be 'general conformity' between the RSS and the Development Plan Document to be explained at the start of this document

The RPB welcomes references made throughout the document to RSS (May 2008) and welcomes the regional planning policy context that is set out throughout the Revised Options document.

### Rotherham in Context

Policies in RSS (2008) seek to focus development on the region's town and city centres. The Core Approach (Policies YH1-YH9) makes clear that most new development, and high trip generating uses, should be focussed on Regional Cities and Sub-Regional Cities and Towns and that away from these sufficient development should be permitted in Principal Towns to enable them to fulfil their role as service centres.

Rotherham is identified as a Sub Regional Town in RSS (2008). Policy YH4 of RSS (2008) provides for Sub Regional Cities and Towns to be the prime focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region. More specifically, Policy SY1 A of RSS (2008) provides for plans, strategies, investment decisions and programmes for the South Yorkshire sub area to transform Rotherham, particularly its town centre as vibrant, healthy, accessible, attractive, and safe place where people live, visit and work, and residential areas through housing market renewal and increased housing development.

Dinnington is identified as a Principal Town in RSS (2008). Policy YH5 (2008) provides for Principal Towns to be the main focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities. Policy SY1A of RSS (2008) supports the continued growth of Dinnington to support its role as a Principal Town.

It will be important for the Core Strategy to set out the context provided by the sub area policies and the relationship that Rotherham has with the rest of the South Yorkshire sub area. This will be particularly important in terms of setting out Rotherham's relationship with Sheffield and Doncaster, as it lies between the two settlements and has strong labour and housing market links with both.

### Revised Objectives and Policies

The RPB is encouraged by the reorganised objectives and the outline of proposed Core Strategy policies. The RPB is encouraged that the Revised Options document states that more attention will now be given to green infrastructure and infrastructure delivery.

Since the RPB commented on the Preferred Options consultation document, Policy YH8 "Green Infrastructure" has been included as a Core Policy within the current RSS (2008). Green infrastructure is an important component of ensuring that future development provides positive benefits for the region and helps deliver sustainable communities.

Policy YH8 of RSS (2008) states that it is the role of the LDF to: define green infrastructure; identify and require the retention and provision of substantial connected networks of green infrastructure; ensure that policies have regard to the economic and social as well as environmental benefits of green infrastructure assets; and identify the functional role of green infrastructure in supporting the provision of renewable energy, urban microclimate control, and flood risk management.

In terms of infrastructure delivery it is worth pointing out that the RPB is currently developing a guide in order to offer practical support and guidance to local planning authorities in preparing infrastructure delivery plans, which may be of use to you alongside the preparation and development of your Core Strategy. This guide will be available on the Local Government Yorkshire and Humber website ([www.lgyh.gov.uk](http://www.lgyh.gov.uk)).

### Scale of Development

The document states that the Rotherham Strategic Housing Market Assessment (2007) estimates that the annual housing need required in the Borough is 792 new homes, which provides for a total of 15,049 homes between 2008-2026. Table 2 and Map 1 highlight the distribution of the projected housing need identified across the District by the Strategic Housing Market Assessment (SHMA) between 2008-2026. The RPB notes that 48% of the projected housing need identified by the SHMA is in the Rotherham Main Urban Area.

The document rightly states that RSS (2008) requires 23,880 homes to be built in Rotherham between 2004-2026. Policy H1 of RSS (2008) states that plans, strategies, programmes and investment decisions should ensure the delivery of the annual net additions to the dwelling stock set out in Table 12.1 in locations that accord with the Core Approach. Table 12.1 in RSS (2008) sets an annual average net addition to the dwelling stock in Rotherham of 750 units between 2004-2008 and 1160 units between 2008-2026. This figure equates to a total of 23,880 net dwellings from 2004-2026. It is worth noting that the RSS (2008) takes a net approach because of the uncertainty surrounding the calculation of gross housing figures particularly in the longer term.

The document also makes helpful reference to the fact that South Yorkshire was awarded New Growth Point status in July 2008, which has increased the housing numbers for South Yorkshire by 20% above the RSS target for the period between 2008/09 and 2016/17. It is worth emphasising that Policy H2 of RSS (2008) provides for local planning authorities to adapt a flexible approach to the delivery of housing by not treating housing figures as ceiling targets, whilst ensuring that development is focussed on locations that deliver the Plan's Core Approach and Sub Area policies.

Policy H3 (2008) also provides for the delivery of extra housing that supports strategies and programmes for those areas where interventions are already in place or are proposed and local markets that adjoin these areas. These include Transform South Yorkshire Pathfinder and adjoining areas. There are five HMR areas identified in the Rotherham District.

It is worth highlighting that the document makes reference to the RSS Update 2009, stating that the RSS (2008) is currently in the early stages of review. The document

highlights that this will have implications on Rotherham's housing requirement as this will need to be looked at again as part of this review and as a result it could change in the future.

It is worth noting that the RSS Update 2009 work commenced in April 2008 in response to the need to look at longer term approaches to accommodating growth, to test national housing supply ranges and to take into account climate change impacts, infrastructure issues and emerging proposals for ecotowns and growth points. Three key stages of work were completed – the project plan, a call for evidence and consultation on spatial options.

Whilst Government household projections remain a relevant material consideration for Core Strategy preparation, the work at regional level on their policy implications will now be taken forward through work on the new Integrated Regional Strategy, which will not lead to a replacement to the RSS until 2011. A note clarifying the current range of work that LAs will need to take into account on housing issues is now available on our website at [www.lgyh.gov.uk](http://www.lgyh.gov.uk) by following the following links:

*Our Work-Regional Planning-IAP-Current Priorities-Maintaining the Delivery of Housing*

### Employment Land

The RPB is encouraged that since it commented on the Preferred Options consultation in March 2007, further work has been carried out to refine employment land requirements to the end of the LDF period in 2026. This work has taken into account the possible increase in population as a result of New Growth Point status and recent take up rates of employment land, RSS (2008) requirements and job projections.

### Potential Capacity

The RPB is encouraged that the Core Strategy Revised Options document has taken the 'sequential approach' as set out in Policy YH7 of RSS (2008) as a starting point to set a clear approach to where development should be focussed. Table 5 of the Revised Options document correctly makes reference to Policy YH7 of RSS (2008). Table 6 of the Revised Options document highlights the potential capacity for new development on brownfield, greenfield or on a mix of both. This table shows that in terms of housing development there is the potential capacity to build 26% of homes on brownfield land, 70% on Greenfield land and 4% on a mix of both. It is worth noting that Policy H2 of RSS (2008) includes a regional target for 65% of housing development to be on previously developed land and through conversions of existing buildings. If the regional target can not be met then local evidence will need to be provided which supports why a lower target is being proposed.

### Creating Sustainable Communities

The RPB is encouraged that the South Yorkshire Settlement Study (2005) has influenced the Core Strategy and provided a basis for the development of a settlement hierarchy for Rotherham. Table 7 helpfully highlights the implications of new development on each individual settlement.

Map 2 shows the proposed settlement hierarchy in the Rotherham District. The RPB welcomes that the key focus is on Rotherham's main urban area and Dinnington is identified as a Principal Town, which is in line with RSS Policies YH4, YH5 and SY1. Map 2 also identifies potential Principal Towns including, Wath/Brampton/West Melton, Swinton/Kilnhurst, Maltby, Bramley/Wickersley and Kiveton Park. RSS Policy YH5 and 18 King Street, Wakefield, WF1 2SQ

its accompanying text (see paragraph 2.40) suggests that in particular circumstances (including those in South Yorkshire), further Principal Towns from those listed in the RSS (2008) might need to be identified where they will help to support the delivery of the Core Approach and fulfil other criteria.

### Potential Urban Extensions

The document states that Waverley represents the largest single brownfield opportunity in South Yorkshire, and the site has an important strategic location. In July 2008 the RPB was provided with the opportunity to comment at pre-application stage for outline planning applications for a new sustainable community and Government office development at the Waverley development site. In its response (dated 31 July 2008), the RPB supported development at this site for the uses proposed providing that public transport is fully incorporated and that the proposed non-residential elements are in line with Policies YH4 and E2 of RSS (2008) to ensure that the proposal does not undermine the role of Sheffield as a Regional City.

In July 2009 the RPB was provided with the opportunity to comment on an outline application for development of B1 office (60,000 sq.m), hotel and ancillary retail and leisure facilities at the Waverley site. In its response (dated 29 July 2009) the RPB built on its previous comments and concluded that the proposed scale and type of development could potentially raise an issue with the implementation of several RSS policies including YH4, SY1 and E2 of RSS (2008). The RPB recommended that to avoid harm to the implementation of RSS (2008) policies the LA should impose a condition to control the number and type of office units on the site so that the proposal does not compete directly with the office markets of Rotherham and Sheffield City Centres.

The Waverley site also includes the Advanced Manufacturing Park. Policy SY1B of RSS (2008) supports Advanced Manufacturing and related Research and Development at Waverley.

### Proposed Spatial Options

The document provides three proposed Spatial Options. For each of these options, spatial choices are provided with a given number for new homes to be built and amount of employment land to be provided. The RPB feels that a more rational approach could be set out in the document to express what different spatial choices mean in terms of numbers and capacity. It is also felt that the identified transport corridors and the Waverley site should be components of a discussion of any given growth rate.

There is a need for the spatial choices to be more up front about what their implications would mean for frail and fragile housing market areas. The scale and distribution of new housing provision in and around housing areas with fragile or failing markets can have a significant effect on policies in those areas to stimulate demand. For example, excessive new housing provision adjacent to these fragile or failing market areas can exacerbate the problem. Therefore broad locations for new housing development should reflect this consideration, including implication areas outside the Borough (i.e. including Sheffield).

It will also be important for the document to explain how the spatial choices reflect economic linkages/relationships with areas outside the Borough such as Doncaster, Sheffield and the East Midlands.

In terms of the three proposed Spatial Options, it is clear that Options 1 and 2 more directly reflect the Core Approach of RSS (2008). Options 1 and 2 are supported as they provide for Rotherham Urban Area to be the main focus for growth and focus future growth on Dinnington as an existing Principal Town. Both Spatial Options also allow for urban extensions at Bassingthorpe Farm and Waverley. However the RPB does have concerns over the distributed settlement hierarchy because the proportion to be distributed in Rotherham urban area (of 33% for Option 1 and 25.5% for Option 2) is much lower than the RPB would expect. As referred to previously, the Rotherham Strategic Housing Market Assessment has identified a 48% projected housing need in the Main Urban Area, the RPB is therefore surprised that this local evidence has not been reflected and taken account of in the proposed Spatial Options.

RSS (2008) sets a target that 50% of housing development in the region as a whole should be focussed on the Regional and Sub Regional Cities and Towns. Paragraph 2.33 of RSS (2008) specifically states that in all districts, housing growth should be located so that the proportion of households living in the relevant Sub Regional Town (of which Rotherham is one) increases, and the regional target of at least 50% should be sustained over the Plan period.

The RPB would also raise concerns with the amount of proposed housing development to be built on brownfield land. Spatial Option 1 provides for 34 %, Spatial Option 2 provides for 29% and Spatial Option 3 provides for 29% of housing to be built on brownfield land. As stated earlier it is worth reiterating that Policy H2 of RSS (2008) includes a regional target for 65% of housing development to be on previously developed land and through conversions of existing buildings. Local evidence will need to be provided which supports why a lower target is proposed.

All three proposed Spatial Options would result in the loss of Green Belt Land. The previous Preferred Options consultation stated that local boundary reviews may be necessary to meet employment and housing needs, to which the RPB raised concerns. Policy YH9 of RSS (2008) recognises that localised reviews of green belt may be necessary in some places to deliver the Core Approach and Sub Area policies. Policy SY1C of RSS (2008) provides for the general extent of the South Yorkshire Green Belt to be maintained. The RPB would look to any reviews being carried out within the South Yorkshire context to avoid piecemeal changes to the Green Belt.

### Options for Rotherham Town Centre

The RPB is encouraged that the importance of Rotherham's town centre has been reflected in the Revised Options document. Its importance is emphasised in Policy SY1 B of RSS (2008) which provides for the development of Rotherham's town centre to ensure that the town is a brighter and more vibrant place to work, visit and invest in, establishing a new civic focus, capitalising upon public spaces and a new riverside, with the best in architecture and design. Policy E2 of RSS (2008) highlights the importance of the role and performance of existing town centres. Policy E2 provides for plans, strategies, investment decisions and programmes to strengthen the role and performance of existing town centres. It emphasises that centres of Sub Regional Towns (of which Rotherham is one) should be the focus for offices, retail, leisure, entertainment, arts, culture, tourism, and more intensive sport and recreation across the region.

The Revised Options document provides three potential Options for the town centre; Option A – consolidation, Option B – expansion and Option C – contraction/dual node. The RPB would be most supportive of Option A. However, the RPB would not be

supportive of Option C which would involve a significant change in the function of the town centre and Parkgate Shopping Park to act as complementary “nodes”. This would also mean the likely reduction in size of the existing town centre and possibly the primary shopping area, which would inevitably undermine Policies YH4, E2 and SY1 of RSS (2008).

One of the main goals identified by the Rotherham Strategic Development Framework (2005) for the town centre was to populate the town’s centre by creating good quality living. The RPB feels that it will be important for the document to place a greater emphasis on the future housing/living role of Rotherham town centre, which is key part of the wider South Yorkshire view.

#### Affordable Housing

In the RPB’s response to the Core Strategy Preferred Options (made on 21 March 2007) the RPB expressed concerns that although it was stated that the issue of affordable housing provision would be covered in a future DPD, there was no indication provided in the Preferred Options document as to the possible level of need in the District. The Regional Housing Strategy 2005 identifies affordable housing need in the Rotherham district as being ‘low’. Policy H4 of RSS (2008) states that LDFs should set targets for the amount of affordable housing to be provided. Provisional estimates of the proportion of new housing that may need to be affordable in Rotherham is up to 30%. It would be helpful if this document made reference to these provisional estimates set out in Policy H4 and provided further evidence from the regional and the Rotherham Strategic Housing Market Assessment (2007).

#### Housing mix

The RPB also expressed concerns that the Preferred Options document lacked sufficient reference to the importance of housing mix. Policy H5 in RSS (2008) emphasises the need for the current mix of housing in the Region to change so that it better supports the creation of more sustainable communities. The Policy recommends that plans, strategies, investment decisions and programmes should ensure the provision of homes for a mix that reflects the needs of the area, including homes for families with children, single persons, and older persons, to create sustainable communities.