CABINET MEMBER FOR ECONOMIC AND DEVELOPMENT SERVICES

Venue:	3rd Floor, Room 1, Bailey House, Rawmarsh Road, Rotherham	Date:	Tuesday, 22 March 2005
		Time:	8.30 a.m.

AGENDA

- 1. To determine if the following matters are to be considered under the categories suggested, in accordance with the Local Government Act 1972.
- 2. To determine any item which the Chairman is of the opinion should be considered later in the agenda as a matter of urgency.
- 3. Minutes of a meeting of the Local Development Framework Steering Group held on 4th March, 2005 (Pages 1 4)
 - to receive the minutes and note the issues raised.
- 4. Whiston Proposed Traffic Calming Scheme (Pages 5 18) Schemes and Partnerships Manager to report.
 - to report the results of a consultation exercise.
- 5. B6089 Packman Road, Brampton Pedestrian Island (Pages 19 21) Schemes and Partnerships Manager to report.
 - to consider a proposal to construct a pedestrian island.
- 6. Heritage Counts 2004 The State of England's & Yorkshire's Historic Environment (Pages 22 25)

Head of Planning and Transportation to report.

- to consider a summary of the state of the historic environment.
- 7. Pre-Draft Regional Spatial Strategy Phase 2 Papers (Pages 26 45) Strategic Planner to report.
 - to seek endorsement of the consultation response to be submitted to the Yorkshire and Humber Assembly.
- 8. Building on Success CABE Urban Design Summer School 2005 (Pages 46 50)
 - to consider attendance.
- 9. EXCLUSION OF THE PRESS AND PUBLIC

The following items are likely to be considered in the absence of the press and public as being exempt under those paragraphs, indicated below, of Part 1 of Schedule 12A to the Local Government Act 1972:-

10. CERB - 1.25 Townscape Heritage (Pages 51 - 53)

Forward Planning Manager to report.

- to approve the return of the allocation to the budget.

(Exempt under Paragraphs 5 and 8 of the Act – grant allocation/expenditure)

11. CERB Contribution towards environmental improvements on Doncaster Road (Pages 54 - 56)

Reclamation Officer to report.

- to retain the balance of existing CERB approval.

(Exempt under Paragraphs 5 and 8 of the Act – grant allocation/expenditure)

- 12. CERB 1.20 Contribution to Urban Renaissance Public Realm (Pages 57 59) Development Surveyor to report.
 - to retain existing CERB approval.

(Exempt under Paragraphs 5 and 8 of the Act – grant allocation/expenditure)

- 13. Templeborough to Rotherham Flood Alleviation Scheme (Pages 60 68) Partnership Implementation Officer to report.
 - to update Members on progress on the Templeborough to Rotherham Flood Alleviation Scheme.

(Exempt under Paragraph 9 of the Act – land and property)

ROTHERHAM LOCAL DEVELOPMENT FRAMEWORK STEERING GROUP Friday, 4th March, 2005

Present:- Councillor Smith (in the Chair); Councillors Burke, Hall, Pickering, Walker and Wyatt.

together with:-

Andy Duncan Strategic Planner

Ken Macdonald Solicitor

Helen Sleigh Planner, Pathfinder Phil Turnidge Senior Planner Joanne Wehrle Partnership Officer

8. INTRODUCTIONS/APOLOGIES

Apologies were received from:-

Steve Holmes Community Involvement Manager

Phil Gill Greenspaces Manager
Phil Rogers Strategic Leader, ECALS

9. MINUTES OF THE PREVIOUS MEETING HELD ON 28TH JANUARY, 2005

Consideration was given to the minutes of the previous meeting held on 28th January, 2005.

Resolved:- That the minutes of the previous meeting held on 28th January, 2005 be approved as a correct record.

10. MATTERS ARISING

Page 2 – Item 5 – Local Development Scheme

The Senior Planner reported that the Scheme had been approved by Government Office, and the Government Office had written to say that they did not wish to intervene. It was pointed out that Rotherham was the second in the region to achieve this, and the first Metropolitan Authority.

It was pointed out that there was now a need to bring the Scheme into effect.

The Solicitor advised that as the Government Office did not wish to intervene then the scheme would take effect four weeks after submission i.e. 11th March, 2005. Therefore it was necessary for the Cabinet on 9th March, 2005 to make a resolution that pursuant to the relevant Regulation

the Local Development Scheme shall take effect from 11th March, 2005.

Resolved:- That the Cabinet be asked to resolve that the LDS shall take effect from 11th March, 2005.

11. FIRST DRAFT - STATEMENT OF COMMUNITY INVOLVEMENT

The Senior Planner circulated an early draft of this document and explained that this was the first that the Council was committed to producing in the laid down timescale.

This involved consultation with community stakeholders. To date it was proposed to pursue three options:-

- (i) front loading where one or two people were consulted to discuss the broad approach and content.
- (ii) under the Regulations the Regional Planning Body and neighbouring local authorities had to be consulted.
- (iii) meeting with the Community Development and Involvement spoke of the Local Strategic Partnership this was scheduled for 17th March, 2005.

It was pointed out that the draft had been written very closely in accordance with the guidance and it was hoped that the general content and approach would have been agreed by the end of March.

It was then proposed to work up the first formal version to go out to formal consultation in late April and May to a much wider list of consultees. The aim was to submit the final document to the Secretary of State in August.

The Senior Planner explained what the document was trying to do and gave a brief outline of each of the six sections and appendices.

It was pointed out that although the Service Area had experience of consultation this work would be compromised by resource capabilities.

In the light of the refresh of the Community Strategy Members commented that it was vitally important that all programme areas understood the reason for the consultation and were committed to it. It was also essential that the key role of the Local Strategic Partnership was acknowledged. Reference was also made to the involvement of Parish Councils and Area Assemblies.

Members of the Steering Group were asked to submit their views to the Senior Planner.

Resolved:- (1) That efforts be made to encourage greater participation

from the LSP

- (2) That the Senior Planner liaise with the Head of Planning and Transportation Service to include this issue as an agenda item for the all Parish Councils meeting scheduled from 29th March, 2005.
- (3) That the Senior Planner discuss with the Community Involvement Manager the most appropriate way of consulting with Area Assemblies.

12. REGIONAL SPATIAL STRATEGY - CONSULTATION RESPONSES

The Strategic Planner gave an update on the pre-draft Regional Spatial Strategy (RSS) and circulated a brief paper.

It was reported that comments on phase 1 papers had been submitted, and that consideration of phase 2 ended on 18th March.

The paper highlighted the most significant issues and implications for Rotherham.

It was explained that the Spatial options paper considered three scenarios (A, B & C) each with different policy emphasis.

In terms of housing reference was made to the Pathfinder and the Northern Way. It was noted that current draft figures for Rotherham was less than recent completion rates. There were also concerns about the projections the Regional Assembly was using regarding the economy.

Difficulties with the original RSS timetable had now been recognised and a revised timetable had been put forward. This would have an impact on the LDF production.

It was pointed out that as part of the LDF documentation an Annual Monitoring Report was required so this was the mechanism to report if the programme was slipping.

Resolved:- That the update be noted.

13. HOUSING MARKET RENEWAL PATHFINDER MASTERPLANS - UPDATE

The Planner, Pathfinder, provided an update on the Housing Market Renewal Interim Masterplans for Rotherham East, Rotherham West, Rawmarsh Parkgate and Wath/Swinton, and circulated a paper for Members' information.

A summary of the presentation held at React on 16th February, 2005 was given.

The paper contained comments that had been made and were relevant to

all four ADF'S.

Reference was made to the following:-

- greenfield/belt sites
- sustainability appraisal
- strategic environmental assessment
- the Jacobs Babtie South Yorkshire Settlement Assessment Study and the CURS report on housing and their relevance to the LDF
- linkages to other spatial masterplans e.g. Manvers Lakeside
- design
- likely timescales for delivery and achievability

Resolved:- (1) That the report be noted and the progress made by the Masterplanners in delivering spatial masterplans for the four peripheral ADF's be acknowledged.

(2) That the delivery of a robust communication and consultation strategy be supported.

14. ANY OTHER BUSINESS

There were no further items of business.

15. DATE, TIME AND VENUE OF NEXT MEETING

Resolved:- That the next meeting of this Steering Group be held on Friday, 1st April, 2005 at 10.00 a.m. at the Town Hall, Rotherham.

ROTHERHAM BOROUGH COUNCIL – REPORT TO MEMBERS

1.	Meeting:	Economic and Development Services
2.	Date:	21 March 2005
3.	Title:	Whiston – Proposed Traffic Calming scheme; Ward 15
4.	Programme Area:	Streetpride

5. Summary

To report the results of consultations carried out regarding the proposal to introduce a traffic calming scheme on Moorhouse Lane, High Street, Greystones Road and Cow Rakes Lane, Whiston.

6. Recommendations

- i) Changes to the scheme to overcome some of the concerns be noted;
- ii) Objections to the use of vertical traffic calming measures be not acceded to;
- iii) Support for the scheme be reiterated.

7. Proposals and Details

The scheme proposed will mainly involve the introduction of vertical traffic calming features, in the form of flat topped road humps and speed cushions. These will be spaced in such a way that they will aim to discourage inappropriate speed and through traffic, without having an adverse effect on residents using these roads or on the emergency / bus services

The scheme will also involve some alterations to the footways on High Street, with improvements to the signing to improve driver awareness and compliance of speed limits.

8. Finance

The scheme is estimated to cost approximately £55,000. Funding is available from the Local Transport Plan Integrated Transport Capital Programme for 2005/06.

9. Risks and Uncertainties

The estimated cost is dependant upon the need to divert Statutory Undertakers' apparatus; this is expected to be minimal.

10. Policy and Performance Agenda Implications

The proposed scheme is in line with objectives set out in the South Yorkshire Local Transport Plan, in conjunction with the Rotherham Metropolitan Borough Council's Road Safety and Traffic Management strategies, for improving road safety.

11. Background Papers and Consultation

For a number of years residents have raised concerns about the amount of traffic that uses Moorhouse Lane, High Street and Cowrakes Lane as a rat-run through Whiston. In addition they have also raised concerns about the speed of vehicles through Whiston itself.

As a result of these concerns a scheme was drawn up to introduce measures on High Street, Moorhouse Lane, Cowrakes Lane and Greystones Road, in an effort to reduce both the amount of through traffic and the speed of vehicles.

Following initial scheme design, a consultation exercise was carried out with the residents of Whiston, in the form of a consultation leaflet and reply card being delivered to approximately 770 properties. From this consultation 37% of residents responded with 83% of these being in favour of the scheme. In addition, consultations were carried out with South Yorkshire Police, South Yorkshire Fire and Rescue Service, South Yorkshire Metropolitan Ambulance Service, South Yorkshire Passenger Transport Executive, Scope, Rotherham Chamber of Trade, Whiston Parish Council and local ward members.

From this consultation a number of minor amendments were made to the scheme. These involved relocating the proposed priority working system on High Street, from outside number 5 to the junction with Alma Row; additional signing on Worry Goose Lane; additional pedestrian drop crossings and amendments to the carriageway lining.

Whilst the majority of people welcome the introduction of measures, two objections were received – one from Rotherham Chamber of Trade and one from a local resident (Ramsden). Copies of their objections are attached as Appendix A. No response to our letters have been received from South Yorkshire Metropolitan Ambulance Service, however, they have acknowledged receipt of our reminder.

Although an objection has been received about an increase in noise from delivery lorries going to the local shops, we are unable to relocate the speed cushions to another location, due to the presence of driveways and junctions. However, the number of delivery lorries are unlikely to be significant enough to create a nuisance.

The objection from Rotherham Chamber of Trade relates to Whiston Crossroads and the need for the junction to be included within the scheme, to overcome congestion, as the routes to be treated within Whiston are greatly used as an alternative to the Crossroads. As you will be aware, a scheme is currently being progressed to upgrade Whiston Crossroads to improve capacity, and therefore, reduce congestion at this location.

The location and extent of the revised scheme are indicated on Drawing Number 126/QBC6/M3/2.

Contact Name : Andrew Lee, Assistant Engineer, Ext. 2380, andrew.lee @rotherham.gov.uk

Whiston – 11 blank pages

ROTHERHAM BOROUGH COUNCIL - REPORT TO MEMBERS

1.	Meeting:	Economic and Development Services
2.	Date:	21 March 2005
3.	Title:	B6089 Packman Road, Brampton – Pedestrian island Ward 7 – Hoober
4.	Programme Area:	Economic and Development Services

5. Summary

To report a proposal to put a pedestrian island on Pontefract Road close to Brampton Ellis Junior and Infants school.

6. Recommendations

The necessary consultations be undertaken regarding the proposed island.

Authority be given for the detailed design to be progressed and subject to a satisfactory design being produced and no objections being received the measures be implemented.

The scheme be funded from the LTP Integrated Transport Capital Programme for 2005/2006.

7. Proposals and Details

Currently there are no crossing facilities, at the junction of the B6089 with Brampton Road and Manor Road, to help pedestrians get from the housing estates on the east side of Packman Road to Brampton Ellis Junior and Infants school and Brampton Leisure Centre.

The proposed scheme involves making slight changes to kerb lines at the junctions of Manor Road and Brampton Road with Pontefract Road, together with the introduction of a pedestrian island.

A pedestrian crossing survey was undertaken at this location on 8 February 2005 and the site does not meet the criteria for a controlled crossing.

8. Finance

The scheme is expected to cost £10,000. Funding is available from the South Yorkshire Local Transport Plan Integrated Transport Capital Programme for 2005/06.

9. Risks and Uncertainties

The estimated cost is subject to the need to divert Statutory Undertakers apparatus; this is expected to be minimal.

10. Policy and Performance Agenda Implications

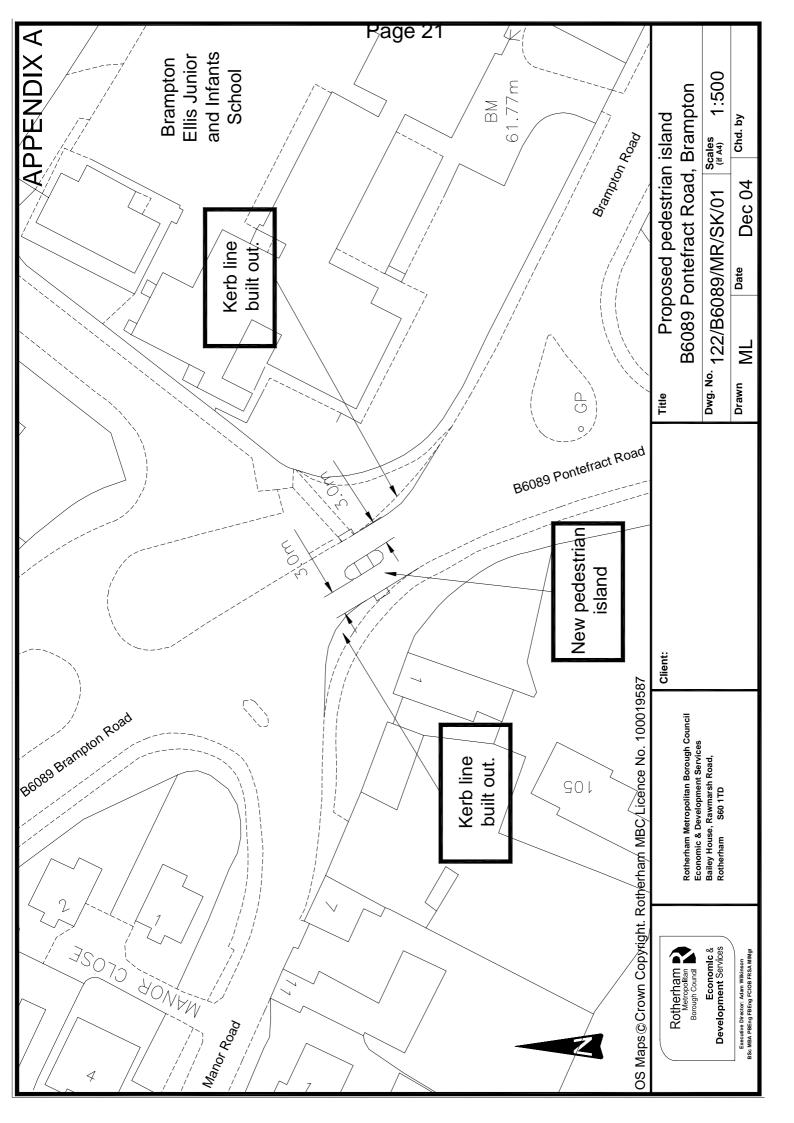
The proposed scheme would be in line with objectives set out in the South Yorkshire Local Transport Plan, in conjunction with Council's Road Safety and Speed Management strategies, for improving road safety.

11. Background Papers and Consultation

A copy of drawing number 129/B6089/MR/SK/01 is attached as Appendix A.

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ROTHERHAM BOROUGH COUNCIL - REPORT TO MEMBERS

1.	Meeting:	Economic and Development Services. Cabinet Member and Advisors Meeting
2.	Date:	21 st March, 2005
3.	Title:	Heritage Counts 2004. The State of England's & Yorkshire's Historic Environment
4.	Programme Area:	Economic and Development Services.

5. Summary

Heritage Counts is the third annual report (that began in 2002) summarising the state of the historic environment. It provides an overview of ten years investment by HLF towards heritage projects across England, and sub-regional summaries of work in nine English regions. This is provided in separate reports prepared by the Historic Environment Forums; funded by English Heritage (EH) and the Heritage Lottery Fund (HLF). Of particular interest to members is the report on *The State of* **Yorkshire's** Historic Environment.

6. Recommendations

That the report be noted, taking particular account of the references within the Yorkshire report to Rotherham, and how the various regeneration initiatives currently promoted by the Council fit into the national picture. Attention is drawn to the usefulness of the web site: www.heritagecounts.org.uk from which the *Heritage Counts* documents can be downloaded; these include many references to linked web sites that may be of interest and use to members.

7. Proposals and Details

The regional reports are sub-divided into three sections: A: Understanding the Region's assets; B: Caring and Sharing; C: Using and benefiting.

The introduction to the Yorkshire report acknowledges that while Leeds and York appear to be fairly buoyant, South Yorkshire is "still struggling to recover from the decline of its steel and mining industries".

<u>Section A:</u> usefully provides regional statistics (within the Yorkshire Region) of, among others, Scheduled Monuments (SAMs), Listed Buildings (LBs); Historic Parks & Gardens and Conservation Areas (CAs). A feature is made of the *South Yorkshire Historic Environment Characterisation Project*. EH are currently funding two project officers, working with the South Yorkshire Archaeology Service (SYAS), to undertake a characterisation study of "the imprint of history on today's environment". Rotherham is one of the initial pilot study areas and the Bridge Chapel is used as an illustration. The study will result in a sequence of maps, with many layers of information; using a map based Geographical Information System (GIS) to better inform planners and landscape managers, as well as providing a resource for the public.

N.B. officers of the Council have already met with the project officers.

Section B: draws attention to the fragile nature of the historic environment and how this is assessed by EH through annually published registers (since 1998) of *Buildings & Landscapes at Risk.* In addition to EH's register of higher graded buildings (I & II*) some 10 authorities in Yorkshire publish their own registers of buildings at risk at all grades. Rotherham is one of six other Yorkshire authorities currently surveying all their listed buildings with the intention of publishing such a list in the future. Regarding landscapes there is an initiative this year to survey all Registered Parks & Gardens in the region, which also includes cemeteries. The former *Meadow Pottery* at Rawmarsh, Rotherham is illustrated (as excavated by SYAS) as a good example of an archaeological investigation of a brownfield site where two kilns were discovered during groundwork preparations for housing development; these were recorded and preserved *in-situ* under a raft.

<u>Statistical evidence</u> from the ODPM (Jan-March 2004) identifies an 11% increase in all planning applications in Yorkshire, the highest annual increase since 1989. This increase is reflected in the number of LB Consent applications that has risen by almost 2% during 2003- 4.

Skills & Training: the HELM (Historic Environment Local Management) initiative was launched by EH in 2004 designed to improve awareness amongst decision-makers within local authorities of the historic environment and the economic and social opportunities it presents; see the website www.helm.org.uk for expert guidance to historic buildings, archaeology and landscapes.

<u>Heritage Open Days:</u> has gone from success to success being an annual Civic Trust initiative held over one or two weekends in September each year. 2004 not only saw a significant increase in properties taking part "but also encouraged a

greater diversity in participants" that included faith buildings from the Muslim, Hindu and Sikh communities.

Section C: highlights heritage-led regeneration schemes feeding through into wider master plans such as Yorkshire Forward's Renaissance Market Towns Initiative. Also the financial value of tourism to the region that is worth £4 billion annually, employing 10% of Yorkshire's work force, and being responsible for 5% of its GDP. The region has seen an increase in visitor numbers and an increase in gross revenue last year of 4%, with a noted increase of visitors to country parks. There is need to raise the quality of the 'offer' in both the region and local areas, and avoid duplication of effort across the sector. The UK Sustainable Development Strategy is under review to include the contribution that the historic environment has to give to support sustainable development. Following a workshop held in Yorkshire in July 2004 a recommendation was made that the second of the government's four priority headings for the Strategy was re-worded to read:

"Sustainable consumption, production and use of natural **and historic** resources".

8. Finance

Investing in the Historic Environment:

- Two-thirds of the region's historic places are in private ownership and are maintained and repaired by owners at their own cost – a largely unquantified and under-acknowledged investment.
- Potential sources of investment include earned income, government and EU funding, private donations, business sponsorship, trusts and charitable donations. The Yorkshire Historic Environment Forum is developing an investment strategy for the future management of the regions' historic assets.
- Single pot administered by Yorkshire Forward last bids in 2005, current programme ends in 2006.
- HLF is the largest single source for the conservation of the historic environment in England – the grant to Rotherham's Clifton Park Museum (for refurbishment and display) is identified as one of the larger awards within the Yorkshire Region; £2.1m from more than £233m granted to over 1,300 projects.
- EH grants to places of worship and to other historic buildings.

Of Particular Interest to Ward Councillors: (see para. B3.1.5)

Community based funding is available for small scale community-focused heritage and historic environment projects from sources such as:

- o Neighbourhood Renewal Fund,
- New Deal for Communities,
- Positive Activities for Young People (during school holidays)

9. Risks and Uncertainties

EU structural funding is changing and will be much harder to come by after the current programme ends in 2006. It is vital therefore that the historic environment sector acts quickly to take advantage of the opportunities that currently exist before the last bidding round of the current funding system in 2005. There is also alignment funding from different agencies such as EH's Area Partnership Schemes with the Renaissance Market Town Initiative focusing on the action plans for regeneration involving re-use and restoration of historic assets. The Townscape Heritage Initiative (THI) funded by HLF "is one of the most important ways in which the Fund delivers urban regeneration". A THI can change perceptions of an area and can act as a catalyst for regeneration which would not have otherwise happened, or would have happened more slowly. There is a distinct possibility that there will be a shift in the focus of HLF away from such schemes in the future due to the lack of take-up by Authorities and by the submission of unsuccessful schemes; four such applications were refused in the Yorkshire region last year.

10. Policy and Performance Agenda Implications

The document supports initiatives for regeneration and sustainability.

11. Background Papers and Consultation

Copies of "Heritage Counts 2004 The State of England's Historic Environment" and "Heritage Counts 2004 The State of Yorkshire's Historic Environment" will be made available in the Members' Room prior to the meeting.

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ROTHERHAM BOROUGH COUNCIL – REPORT TO MEMBERS

1.	Meeting:	Cabinet Member for EDS Delegated Powers
2.	Date:	21 March 2005
3.	Title:	Pre-Draft Regional Spatial Strategy – phase 2 papers
		(All Wards potentially affected)
4.	Programme Area:	Economic & Development Services

5. Summary

The report seeks Cabinet Member's endorsement of the consultation response to be submitted to the Yorkshire and Humber Assembly on Pre-Draft Regional Spatial Strategy phase 2 papers.

6. Recommendations

- 1. Cabinet Member to endorse the consultation response to Pre-Draft Regional Spatial Strategy phase 2 papers.
- 2. Cabinet Member to advise on forwarding this report.

7. Proposals and Details

As reported to Cabinet Member for EDS on 21 February, development of the new Regional Spatial Strategy (RSS) is continuing with the latest stage of consultation comprising 19 topic papers (released in 2 phases). Comments on phase 1 papers were requested by 25 February, although submission on 4 March was agreed with the Regional Assembly to allow full consideration by Members. Comments on phase 2 papers are requested by 18 March.

The draft response to the phase 2 papers is attached at Appendix 1, with the joint South Yorkshire response on housing figures at Appendix 2. The most significant issues and implications for Rotherham of the phase 2 papers are summarised below.

Housing

The phase 2 paper (Topic Paper 3a: Distributing the Housing Requirement) shows draft figures for the housing requirement for each district but stresses that the figures have not yet been subject to reality checks. The figure for Rotherham is less than recent completion rates.

During the last three years Rotherham's population has started to increase, largely due to inward migration. In the last two years (2002 and 2003) the increase has been greater than that for England & Wales. This recent increase in population may be in part due to people settling in Rotherham due to its relatively low house prices but taking advantage of job opportunities in adjoining areas, particularly Sheffield. This increase, along with the Council's stated aim to grow the population, may prompt the need for a higher housing requirement for Rotherham.

Rotherham has collaborated with the other South Yorkshire authorities in commenting on this paper. The Council is particularly concerned that the RSS housing allocation should be adequate to support our aspirations to grow the population of Rotherham and provide a quality offer in terms of jobs, housing, leisure opportunities and education.

Sustainable Tourism

The paper outlines the Assembly's proposed approach to tourism in new RSS. Priority is to be given to existing attractions with applications for new attractions to be treated on their own merits. Promotion of tourism should encourage the use of sustainable means of access to the region.

The Council's draft response agrees with the general sustainable tourism principles suggested in the paper and also points out that Rother Valley Country Park should be identified as a "tourism sub-area" if the current proposals for its expansion go ahead.

Retail and Leisure

The paper acknowledges the shortcomings of current RSS and outlines the revisions necessary, i.e. establishing a regional hierarchy of centres, assessing need for new development and identifying locations to meet that need. The issue of regional casino development is also considered. Progress on retail and leisure policy is to a large degree dependent on publication of PPS6 and a subsequent regional retail study the

Assembly wish to undertake and therefore may have to be part of an early review of new RSS.

The draft response supports the general approach outlined in the paper but stresses that a hierarchy of centres should not jeopardise the aspirations of the Town Centre Renaissance programme and that such programmes should be referenced in new RSS. The response supports the inclusion in new RSS of a policy on regional casinos.

Timetable

In light of difficulties in meeting the original timetable, the need to accommodate the Northern Way and with a desire to align the production of new RSS with review of the Regional Economic Strategy and Regional Housing Strategy, the Assembly intend to adopt a revised timetable. Subject to Ministerial agreement this will most likely comprise:

Sept 2005 Assembly to agree Draft new RSS and submit to Government Late 2005 Formal consultation on Draft new RSS (12 weeks)

Spring 2006 Public Examination into Draft new RSS

Sept / Oct 2006 Panel Report

Early 2007 Proposed Changes to new RSS Mid 2007 Secretary of State issues new RSS

This extended timescale will allow more time for the Assembly to work with stakeholders in the development of new RSS but will have knock on effects for the production timetable of Rotherham's LDF.

The Council will ensure ongoing involvement through existing channels in the development of new RSS and officers will report again at future stages of its evolution.

8. Finance

No direct implications although new RSS will influence Rotherham's emerging Local Development Framework, and second Local Transport Plan and hence funding opportunities and priorities.

9. Risks and Uncertainties

Regional governance will be strengthened under the Government's devolution proposals and the new Planning Act increases the spatial and sub-regional content of the Regional Spatial Strategy. Whilst the new RSS will be more specific about regional and sub-regional land use policy there should also be safeguards to protect local autonomy in the application of policies.

10. Policy and Performance Agenda Implications

If the new RSS (when adopted and implemented) achieves the aims of Advancing Together, the knock on effects should make a positive contribution to all of Rotherham's Regeneration priorities in the community plan.

Although not directly addressed in the consultation document, equalities issues should benefit positively from the successful implementation of new RSS policies.

Achieving sustainable development is a core theme of Advancing Together and will be reflected in new RSS. Likewise, new RSS vision and objectives will be consistent with the Regional Sustainable Development Framework and its sustainable development aims. At each stage of the development of the new RSS, a Strategic Environmental Assessment/Sustainability Appraisal (SEA/SA) is being carried out. At this current consultation stage, the appraisal has particularly concentrated on the Spatial Options paper. The full report of this appraisal is available from the Assembly.

The new RSS will seek to improve the health of the Region's population by a variety of means.

11. Background Papers and Consultation

Regional Spatial Strategy for Yorkshire and the Humber to 2016 based on Selective Review of RPG12 – December 2004

Pre-Draft Regional Spatial Strategy (19 Topic Papers) – January / February 2005

The Topic Papers were disseminated to the Council's Programme Areas inviting comment.

Contact Name:

Andy Duncan, Strategic Planner, 01709 823830, andy.duncan@rotherham.gov.uk

Appendix 1: Draft RMBC response to Pre-Draft RSS phase 2 topic papers

Topic Paper 3a: Distributing the Housing Requirement

Rotherham has collaborated with the other South Yorkshire authorities in commenting on this paper. The joint South Yorkshire Planning Officers Group response is enclosed with this response.

Commenting specifically for Rotherham, the net annual rates shown in Table 1 seem low, and substantially below the recent build rate of 833 per year (not 720 as shown in Table 3). This is especially true under Scenario A, presumably a contributing factor to this is the low economic change score given under Scenario A (presumably because of Rotherham being viewed as a low demand area).

However, the issue of demand is a complex one. Although Rotherham has indicators showing 'low demand' (and is partly covered by the HMR Pathfinder) it also has a low vacancy rate (despite completion rates in excess of the current requirement). These conflicting indicators may well be as a result of poor quality housing stock rather than low demand.

The Council is particularly concerned that the RSS housing allocation should be adequate to support our aspirations to grow Rotherham and provide a quality offer in terms of jobs, housing, leisure opportunities and education.

Topic Paper 6: CAP Reform

1. Should the RSS draw out the spatially-specific threats and opportunities that the research identifies?

The RSS should provide a sufficient level of detail to allow the spatially specific issues important at the local level to be properly addressed. The key question is to determine the level of appropriate guidance to be included in the RSS. It is felt appropriate that the RSS draws out the spatially-specific threats and opportunities that the research identifies but the prime area of focus for detailed policy guidance should be at the local level.

Whilst doing so there is some concern that the RSS should properly recognise the rurality of parts of South Yorkshire. Whilst South Yorkshire is certainly different to the more rural parts of the region, such as parts of North Yorkshire, the significant rural areas in, for example, Rotherham Borough (70% non-urban) need to be recognised. This concern has wider implications beyond just the CAP reform Topic Paper.

2. Should the potentially differential impact of CAP reform across the region be picked up more in local policy documents rather than in the RSS?

In principle yes, however, the nature and extent to which it should be 'picked up' should primarily be the responsibility of local partners based on and tailored to local needs and circumstances.

3. Is there more that policy in RSS can do (Annex B sets out current RSS policies that are directly relevant) to support the changes that are happening in the agricultural sector in the context of sustainable development?

No comment.

4. Should there be more emphasis on (and resources put into) how the policies and guidelines can be implemented at a local level rather than making the policies themselves more spatially specific?

A balance is required. Whilst welcomed, increasing the emphasis on how the policies and guidelines can be implemented at a local level is unlikely to prove successful without a sufficient policy "hook" within the RSS for the development of robust local level spatially specific policies.

Topic Paper 9: Sustainable Tourism

Sustainable Tourism and RMBC

Sub-regional plans for the South Yorkshire Destination Management Organisation (DMO) area, which includes Rotherham, are currently being drafted. Rotherham Borough Council tourism section is currently preparing a plan for tourism for the next 3 years that will consider sustainable tourism issues and seek to comply with RSS.

1. Do you agree with the seven principles for sustainable tourism that are set out in paragraph 16? If not, are there other principles that you would suggest for regional, sub-regional and local tourism-related strategies and plans to follow?

We agree with the seven principles for sustainable tourism as set out in paragraph 16. However, we are concerned as to how Principle 5 (Adoption of a more sustainable approach to tourism activity by visitors and regional businesses) might be interpreted in practice. This is perhaps the most important 'Principle' identified given that to be truly sustainable, 'sustainable tourism' must address the economic, social and environmental issues in a balanced manner. Each of the other 6 principles ultimately fall under this key principle. This principle would also benefit from a widening to incorporate other stakeholders that simply "visitors and regional businesses".

It would be useful to refer to the overarching Regional Sustainable Development Framework's vision for sustainable tourism, highlighted in Chapter 4, page 35, of the Consultants Report, although even this does not cover the required balance for meeting the "economic, environmental, social and cultural" aspirations.

It may be considered that the seven principles do not give enough explicit emphasis to the need to recognise diversity across the region given the suggested sub-area approach.

2. Do you think that draft RSS, and other regional and sub-regional plans related to tourism development should identify the sub-areas, gateways and hubs suggested in this report (detailed in Annex B) to provide a focus for the development of tourism activity, and the preparation of visitor management plans, in the region? Are there other sub-areas, gateways or hubs that you would identify for this purpose?

Support the identification of sub-areas, gateways and hubs as suggested in the report. It will help focus development in a specific area that is relevant to its particular issues or opportunities. There is potential for the Rother Valley Country Park area to be identified as a sub area following any redevelopment. Through the planning process, major new tourism attractions must demonstrate their accessibility by a variety of transport modes in accordance with PPG13.

It is further suggested that the approach adopted in South Yorkshire allows for the ability to recognise the relationship of rural South Rotherham Borough to the Greater Sherwood Area centred upon Sherwood Forest in North Nottinghamshire. This part of South Yorkshire is more related to the tourism initiatives in the Sherwood Area than other parts of Rotherham Borough, let alone other parts of South Yorkshire. This entails cross-regional working but recognises the appeal of this area as an alternative to the more intensively used areas such as the Peak District.

Suggest other gateways/hubs could be centred on airports (Robin Hood Doncaster Sheffield, Humberside, Leeds/Bradford) or ports (Hull and Immingham). It is important that a robust surface access strategy is developed for the Robin Hood Airport to ensure that Rotherham people are able to access the services and opportunities on offer in a sustainable way.

3. Do you agree that the new RSS should provide more regionally and spatially-specific policies in addition to those in current RSS, as suggested in paragraphs 20 to 23?If not, in what other ways do you think the new RSS should respond to the issues that have been identified?

Agree that the new RSS should include more spatially specific policies for specific areas as the tourism needs and opportunities of different areas will require different policies. The cross-boundary working mentioned in paragraph 20 should include that with authorities in neighbouring regions where relevant and appropriate.

The South Yorkshire Local Transport Plan must reflect the Regional Transport Strategy in the RSS and consider measures to facilitate sustainable tourism, especially when considering public transport links to rural areas. Local strategies such as the Rotherham Countryside Traffic Management Strategy will consider access to tourist attractions in rural areas, contributing towards proposed visitor management plans e.g. for Wentworth village.

Projects such as the National Cycle Network and the Trans Pennine Trail offer sustainable transport links between attractions in Rotherham, South Yorkshire and further afield. These routes can also be sustainable tourism attractions in their own right, if effectively marketed and promoted.

Other issues

- Rotherham has a 4 star hotel and good conference facilities.
- The RSS should mention heritage and church tourism initiatives.
- The draft DMO document for South Yorkshire suggested investigation into economic assessment. It would be ideal to co-ordinate all economic assessments carried out.
- The Council has a current application in for the YES Project at Rother Valley Country Park. Whilst there are significant planning issues to be addressed, should the project go ahead it would be a major tourist destination.

Topic Paper 10: Forestry

1. Do you agree that the RSS has a role in helping to implement the themes, strategic aims and desired outcomes from the RFF, as identified in this Topic Paper?

Yes. The RFF should be the key strategy to guide RSS policy for trees, woodlands and forestry.

2. Are there specific spatial dimensions to the desired outcomes that should be reflected in the draft RSS, in addition to those currently set out in Policy N4 (see Annex A)?

The implications of the Northern Way and Housing Market Renewal Pathfinders approaches will need addressing to ensure adequate provision of "green infrastructure" of which trees, woodlands and forestry are likely to be a key component.

3. Should the specific reference to planting to support the Project Arbre scheme in Policy N4 (see Annex A) now be deleted from the RSS?

No strong views on reference to Project Arbre but reference to the South Yorkshire Forest should definitely be retained in new RSS.

4. Should the target for increasing the coverage of woodland in the region by 500 hectares a year be included in the new RSS (given the stated difficulty of identifying a particular figure for a target), or should it be reworded to state that the target is an overall increase year on year?

The RSS should take guidance from the strategy set out in the developing Regional Forestry Framework to "progressively increase the overall tree and woodland cover in the region but to prioritise new planting in areas where maximum public benefit can be achieved.

Topic Paper 11: Biodiversity

General comments

Overall the messages advocated in the Biodiversity Topic Paper are welcomed and if implemented they have potential to be positive and effective in practice than current RSS policy. It is of some concern that landscape character is not directly addressed in the series of Topic Papers and it is to be hoped that this important issue will be considered at an early stage in RSS production.

1. Do you agree with the recommended biodiversity principles for RSS that the study identifies (paragraph 20)? If not, are there other principles related to biodiversity that you think the RSS should reflect?

Principle i - The identification of opportunities for habitat creation etc. needs to refer to both mitigation for losses / negative impacts **and** proactive enhancement / management within landscaping, provision for public open space, transport links, etc.

Principle ii – The reference to non-designated areas should encompass local wildlife sites, BAP habitats and species, wildlife links / green corridors, temporarily vegetated areas / post industrial land and the importance of habitat mosaics.

Principle iii – The avoidance of net loss is too weak. The majority of Biodiversity Action Plan objectives are to increase the range / extent / quality of priority habitats and species. Regional policy should reflect this.

Principle iv – The importance of landscape character assessment, LDF planning and the need for up to date mapping of natural habitats / species / links & corridors to achieve this should be highlighted.

Principle vii – The emphasis on the proactive approach advocated cannot be overemphasised. This principle needs to be filtered down to sub-regional and local levels to ensure incorporation in individual developments. This also highlights the need for further research and guidance in this area.

2. Do you agree with the spatially-specific issues recommended for inclusion in the RSS (paragraph 22)? If no are there others that you would identify?

Issue ii – It is important to note that the development of green tourism need not be restricted to the areas specified.

Issues iv & v – These should recognise the role of the defined Natural Areas and Landscape Character Assessments and the need to protect habitat mosaics not just individual habitat types. Although key regional habitats are important to protect, so are sub-regional habitats.

Issue vii – This should include making reference to locally prioritised urban habitats and importance of all semi-natural habitats within urban areas, no matter how small, fragmented and/ or isolated.

Issue viii – This should incorporate all farmland areas. New Environmental Stewardship Schemes require reference to biodiversity and all farmland areas should be encouraged and supported in the awareness and management of biodiversity.

3. Are there linkages between biodiversity and other policy areas (in addition to those set out in Annex C) that you think the drafting of the RSS and/or local development documents should draw out?

Section 3 (Rural Issues), bullet point 2 – This would benefit from emphasis on local availability to semi-natural environment and the need for related training and education, not just a tourism resource.

Section 3 (Rural Issues), bullet point 3 – Again this needs increased emphasis on biodiversity within new agri-environment schemes and need to raise awareness with landowners/ managers etc.

Section 4 (Economic Development) – Should includes an additional bullet point to address the promotion of green construction techniques, use of recycled materials, carbon neutral buildings, renewable energy, and the need for increasing resources relating to these issues to aid in awareness raising.

Section 4 (Economic Development), bullet point 6 – Should be more specific and refer to biodiversity within the concepts 'environment' and 'sustainable development'.

Section 5 (Housing), bullet point 1 – Should clarify how 'important' will be defined? The importance of the assessment of long-term negative impacts, i.e. not just habitat losses due to construction, should also be highlighted. Points 2,3,4 & 5 are all positive and are welcomed.

Section 9 (Cultural heritage) – It is suggested an additional bullet point be included to emphasise the need to maintain up-to-date and relevant biological records,

monitoring standards and measures of success in provision of information / awareness raising, etc.

Section 10 (Minerals), bullet point 3 – Does this imply that biodiversity / seminatural habitat is to be the preferred end use for mineral extraction sites?

Section 11 (Waste), bullet point 4 – This laudable aim requires adequate resources to manage such sites. Long-term site management / monitoring is increasingly a problem. Sites should not have to be income generating to be a viable option – there is a need for more funding.

Section 12 (Natural and Built Environment), bullet point 6 – This should also refer to the proactive need to identify existing networks / links / corridors to establish future actions. This should also refer to cross local authority and regional boundaries.

Section 12 (Natural and Built Environment), bullet point 7 – Amend by inserting "and other semi-natural environments" after "trees and green spaces'.

4. Do you agree that the biodiversity issues raised for each of the sub-areas (listed in Annex D) should be considered more in the drafting of local development documents than RSS? Do you have any comments to make on the issues that the study identifies?

The following comments are made in respect to the section on South Yorkshire:

Issue 1 – This point should specify the need to minimise negative impacts and then maximise potential for enhancement - not just mitigation but positive increase in range / quality of semi-natural environments.

Issue 4 – It is not considered appropriate to include named examples within any eventual policy/ policies given that all local authority areas are dynamic and undergoing regeneration / development, all of which need to incorporate biodiversity to be able to successfully achieve sustainable development principles.

Issue 7 - Mineral restoration schemes (and other post-industrial land uses) need to provide greater long-term management resources. The current need to plant trees to obtain grant monies is not always compatible with biodiversity needs.

Issue 9 - Why has Sheffield been highlighted here? Each of the local authority areas within South Yorkshire have their own industrial history / cultural heritage with resultant biodiversity losses that can be addressed through regeneration.

Issue 10 - Should this point refer to all habitats that have been prioritised by South Yorkshire's Biodiversity Action Plans, and not just the four mentioned?

Topic Paper 12: Culture

- 1. Do you agree with the significant cultural characteristics of the region that are identified in Annex B? If not, are there others that you would identify as being important for setting the context for the preparation of the new RSS?

 Yes.
- 2. Do you agree with the key recommendations for RSS that are set out in Annex C? If not, do you think that there are other ways in which the RSS needs to reflect the cultural issues and opportunities identified?

The key recommendation for economic development (p12) refers to "safeguarding and maintaining existing resources and facilities". In the case of open space/sport provision this may not always be desirable as it could be appropriate to dispose of lower quality and value sites. The capital receipts (or a portion of) from such actions may allow for improvements to other open spaces within an area. To reflect this the sentence could be amended to read "safeguarding and maintaining existing resources and facilities, where appropriate".

The retail and leisure section (p15) should place a strong emphasis upon issues of quality and accessibility as well as quantity in determining how best an adequate supply of open space/sports facilities can be achieved.

3. Do you agree with the key challenges and policy proposals for the new RSS that are set out in Annex D? Do you think that some of the proposed policy responses are more appropriate for local development documents, due to the level of detail included in them? If so, how would you suggest the balance between the RSS and LDFs is developed?

Key challenge 13 (p22) - in our work on the greenspace audit, we have used indices of multiple deprivation as a contributing element to value scoring. We identified whether a greenspace site falls within a super output area of the lowest scoring 10% of the indices of multiple deprivation nationally. This could be suggested as a means of identifying where to focus resources in tackling spatial concentrations of poor health/wellbeing within the region.

Topic Paper 14: Education

1. Do you agree that the education and skills related issues that the RSS needs to tackle are those set out in this paper?

Yes.

2. Do you agree that the new RSS should tackle these issues in the way set out in paragraphs 8 to 12 above?

Yes – although clarification is required of the implications of the suggested "education proofing" of policies.

Topic Paper 17: Retail and Leisure

1. Do you agree with the suggested approach to RSS policy development for retail and leisure outlined at paragraphs 20 and 21?

The proposed RSS policy for retail and leisure suggests the identification of a retail/leisure hierarchy of centres. It is considered that it is a suitable approach and would seek to ensure that different types of development would be directed to the relevant centre within the hierarchy. The Adopted Rotherham UDP includes a hierarchy of identified town and district centres, although the Council will be reviewing the centre hierarchy as part of the LDF. It is important that the inclusion of a hierarchy of centres should not jeopardise the aspirations of the Town Centre Renaissance programme.

The proposal to prepare a regional retail and leisure study following the publication of the final version of PPS6 is supported.

- 2. As suggested in paragraph 23 do you agree that new RSS should retain a policy on out-of-centre regional and sub-regional shopping centres? and,
 - a) Should other out of-centre shopping centres be included in addition to those already identified in criterion a) of Policy SOC3?
 - b) If so, which out-of-centre shopping centres should be included in the policy due to their regional or sub regional significance in the Yorkshire and Humber region and why?

Although policy advice in relation to out-of-centre shopping centres is included in national planning guidance, it is considered appropriate that the RSS should also include similar advice. Policy SCO3 adds information that is of regional detail. No additional out-of-centre shopping centres should be included in the policy. Within the Rotherham Borough area, Retail World is important in terms of broadening the shopping offer. However, it is not regarded to be of regional or sub-regional significance and therefore should not be included in this policy.

- 3. Does the rest of existing RSS policy (see paragraph 24) provide a valid and effective regional planning policy for retail and leisure facilities:
 - a) As suggested should most of criteria b) to e) of existing Policy SOC3 be deleted as it adds little of regional value, or
 - b) Should the current Policy SOC3 be retained, or
 - c) Is there any current regional/sub-regional/local evidence that supports a different policy approach that is more specific to the region and broad locations within it?
 - d) Is there more that RSS could say in terms of the vitality and viability of City and town centres in the region, such as addressing poorly performing centres (in the absence of the further work explained at paragraph 21)?

It is not necessary to include criteria that simply repeat national guidance where there is no additional regional interpretation/reference. The proposed regional retail and leisure study is likely to provide evidence that may support a different policy approach that is more specific to the region, which should be taken as further justification for the preparation of such a report.

It may be appropriate to include reference to Town Centre Renaissance programmes in the RSS.

- 4. Do you agree with the suggested approach that a specific new Policy on regional casinos is required in RSS (see paragraph 25)? If so:
 - a) What should the Policy include in terms of appropriate broad locations? and,
 - b) What other regional policy guidance could help the preparation of casino policies in Local Development Plan Documents?

A specific new policy on regional casinos should be included in the RSS. In terms of appropriate locations, information should be included on any specific locations within the region that are identified as being attractive for casino development, the likely scale and nature of development proposals including possible benefits and impacts and more general information on the preferred locations for casinos, such

as within town centres/edge of centres/out of centres/in locations with good transport links etc.

Views on other retail and leisure related issues would be welcome.

No comment.

Topic Paper 19: Climate Change

1. Do you agree with the proposed approach to ensuring that the new RSS addresses both the causes and implications of climate change in the region? If not, what more do you think the new RSS can do?

Yes – if we are to address climate change we need to make deep and quick cuts in greenhouse gas emissions. Planning has an important contribution to make by influencing where development takes place, and developments such as the regional spatial strategy provide new opportunities to reinforce this. It is important to recognise however that planning is only one, albeit key, component in addressing climate change - changing behaviour, for example, is also important. In terms of anything more that could be said, consideration should also be given to an action point around fuel poverty - through support for better insulation, design and build etc.

Appendix 2: Joint South Yorkshire response to Topic Paper 3a "Distributing the Housing Requirement"

General Comments on Methodology

The South Yorkshire authorities remain concerned about the overall complexity of the methodology. We believe it will be extremely difficult for politicians or the public (or even officers!) to understand how the output figures have been derived. Despite the further work that has been undertaken to justify the calculations and weightings in the model, we believe they remain somewhat arbitrary. In our view, this increases the importance of the reality checks at the end of the process and we consider it is likely that some significant adjustments to the outputs will be needed at that stage. The final figures will ultimately boil down to political choices and negotiations between different local authorities.

Question 1: Do you agree that the National Parks should focus on meeting local housing needs as calculated through local needs studies?

This would seem to be a sensible approach. Given the overriding need to safeguard the environment of the National Parks, it would be undesirable for them to accommodate any wider regional housing growth.

Question 2: Should RSS set out targets for net housing required?

We agree that the RSS should set the **net** housing requirement for each district. It is important, however, that the RSS also makes it clear how local authorities should manage the release of housing sites in areas where completions are exceeding in the annual net requirement by a significant margin.

Question 3: Should RSS provide a target for gross housing required for the first 5 years of the RSS time period?

If gross figures are to be included in the RSS, our view is that it would be better for the figure to relate to the full RSS period. This would permit a more straight-forward calculation of the housing requirement using flows in and out of the housing stock (see comments below on suggested re-casting of the housing requirement spreadsheet).

Also, any gross figure included in the RSS would not be set in stone, as the RSS (and LDFs) will be reviewed at regular intervals and this will allow demolition and replacement figures to be updated.

Question 4: Should RSS only present gross figures for the four sub-regions identified in the Regional Housing Strategy?

We do not consider that this would be a logical approach and the figures would be of limited value. We consider that demolition and replacement is primarily a local matter that is better considered through individual LDFs. Any gross figures produced at a sub-regional level would have to be based on estimates supplied by the districts on clearance and replacement.

We therefore recommend that any gross housing requirement figures included in the RSS should only be indicative and local authorities should be permitted to revise figures through the LDF process using the most up to date information available.

Question 5: Do you agree with the proposed use of clearance information?

We do not consider it is appropriate for the housing requirement model to use a projection of past clearance rates to estimate future replacement requirements. In our view, it would be preferable to use estimates of future demolitions provided by the local authorities, taking into account programmed clearance, Pathfinder strategies, vacancy rates, etc. In Sheffield, for example, a substantial amount of clearance has taken place over the last 10 years as the Council has sought to reduce its stock. However, whilst these trends may continue for the next 5-7 years (informed by the HMR Masterplans), clearance rates are likely to fall away significantly after that period. Reviews of the RSS/ LDFs can update the clearance figures as appropriate in light of monitoring and changes to the clearance programme.

The Topic Paper states that the RSS will include advice on the proportion of cleared dwellings to be replaced, for example, in districts where it may not be necessary to plan for one for one replacement. This seems to imply that dwellings demolished in one district may be replaced in another district. If this is the case, this ought to be reflected in the migration assumptions used to calculate the <u>net</u> requirement. However, in practice, we doubt whether the data, or indeed development decisions (mainly thorough HMR masterplans) are in place to enable such assumptions to be made. More importantly, we believe this factor is unlikely to be significant and it is probably simpler just to assume one for one replacement. There should not, of course be a requirement to replace housing that was vacant at the base date (again, the potential difficulties caused by the relationship between demolitions and vacancies can be overcome by using the 'housing stock based' version of the housing requirement spreadsheet which we have suggested below).

Question 6: Do you agree with the approach of weighting some variables based on aspirations of RSS and others using current circumstances?

We consider that this first weighting stage adds to the complexity of the model and are not convinced that the *relative* weightings attached to each variable can be justified. It appears to be entirely based on subjective judgements.

There is also no evidence of how the RSS sub-areas (and the response to articulated key issues such as 'connectivity') will play their part in spatial apportionment. It may be better for the apportionment to take place in two stages:

- a) an initial apportionment to market areas (or sub-regions)
- b) distribution of the market area (sub-region) figure between the districts in that market area

Question 7: Do you agree with the overall approach given to weighting the variables?

We agree that the housing distribution should be informed by policy variables and agree with the scope of the policy variables included in the model. Although the Assembly has done further work to justify some of the variables, we still believe that, overall, they remain somewhat subjective. This is particularly true of the urban renaissance and transport variables.

<u>Urban Renaissance</u>

One way of making the urban renaissance variable more objective would be to base the weighting for each district on the total population living within *main urban areas*.

Environmental Capacity

Topic Paper 3a states that this variable is based in an equal combination of environmental capacity and relative urban capacity. Sheffield has some concerns about the use of urban potential as an indicator of environmental capacity, although this view is not shared by some of the other South Yorkshire authorities (##check##). Sheffield's view is that the urban renaissance variable (see comments above) already provides a reasonable basis for boosting the apportionment of the requirement in favour of the main urban areas (and the urban areas are, in any case, likely to have higher urban potential). Urban potential is already included as a reality check at the end of the process.

The South Yorkshire authorities do, however, consider that the housing requirement model ought to more strongly reflect *environmental constraints to settlement growth*, either as a specific policy variable or as a reality check at the end (see response to question 14 below). For Sheffield, it would be a major concern if the housing requirement were to exceed the urban potential, as peripheral growth around the existing urban areas would be likely to result in significant harm to environmental assets.

Question 8: Do you have any evidence which suggests that the relative weightings given to each local authority area are inappropriate?

Given the comments in response to question 7 about the justification for the weighting of the environmental capacity variable, we strongly disagree with **Sheffield's** '4' rating for environmental capacity. The constraints to outward expansion of the urban areas in Sheffield is recognised in the current RSS, paragraph 6.23, which notes that the Sheffield housing requirement *'reflects environmental constraints to outward expansion'*. That situation has not changed. On the western side, the urban areas are hard up against the Peak District National Park and most of the urban fringe areas are of significant ecological value or are of local landscape importance. There may be some <u>limited</u> potential for expansion on the eastern side of the main urban area but this also carries the risk of further merging Sheffield with Rotherham.

For **Doncaster**, the environmental constraints do not actually constrain the capacity of residential development in a practical sense, merely its distribution and therefore Doncaster would strongly object to a rating of '2'. The affordability rating is also too low given Doncaster's higher than regional increase in average house prices since

the base date used for this variable. The Finningley factor and other recent and projected investment trends would support a higher rating for the economic variable.

Question 9: How much weight should be given to past build rates as part of the reality check?

Question 10: Do you have any evidence which might explain the reasons for the high rate of completions?

Whilst past completion rates provide some indication of the capacity of the house building industry in a particular area, **Sheffield** consider that they should be used with some caution. This is on the basis that:

- a) past completion rates may reflect unsustainable patterns of development (in particular, the availability of greenfield sites which received permission pre-PPG3)
- b) recent high completion rates in many of the main urban areas reflect the huge expansion in the city-living market and the development of apartments. This market may be unsustainable in the longer term and high completion rates may not be deliverable if local authorities seek a better mix of house types through their LDFs.
- c) Much of the recent development has taken place in areas where the market has been reasonably strong – many of the opportunities for future building will be in more challenging market areas (for example, in areas subject to housing clearance)

However, in **Doncaster**'s case, the average completion rate since 1986 is almost identical to that since 1998; even last year's completions were not far off this average despite a Greenfield Moratorium. The authority are therefore satisfied that, in their case, the past build rate is a good reality check.

Question 11: Should rural areas with significant affordability problems be given higher house building figures to help address affordability or should targets be set for higher proportions of affordable homes on any given site?

Our view is that both these steps are needed if the affordability problems are to be tackled in the rural districts. The initial housing requirement figures produced for some of the North Yorkshire authorities appear very low and, if carried forward, would provide little potential to tackle the affordability problems in the county. We consider some <u>limited</u> increase would be appropriate.

Question 12: How important are currency vacancy rates as part of the reality check?

It is essential that the housing requirement model uses the vacancy rates at the base date (2001) and <u>not</u> the current (2004) base date. The 2004 vacancy rate is of some value as an indicator of trends in vacancies but use of the figures in the actual model would result in a significant miscalculation of the requirement, particularly for those

authorities that have demolished large numbers of vacant dwellings in the period 2001 to 2004. Again, we urge the Assembly to use the *housing flows model* illustrated in an appendix to these comments.

It is also worth noting that, for many authorities, the actual number of vacant dwellings will go up between 2001 and 2021 because the vacancy rate remains the same (or only changes slightly) but, by 2021, the total stock is much larger. To compensate for this effect, extra dwellings would need to be built if all the additional households are to be accommodated. This effect is only apparent by using the housing flows model we have suggested.

There is also a strong consensus amongst the four South Yorkshire authorities that the target vacancy rates should be varied for individual local authorities. We recommend that the Regional 3.5% target should be dropped. Some authorities (e.g. Sheffield and Rotherham) already had a vacancy rate below 3.5% in 2001 but, for other local authorities, local factors mean that the 3.5% target may not be achievable.

Question 14: Are there any other reality checks we should be applying?

We suggest that a further reality check, relating to environmental constraints to settlement expansion, should be included. This might involve, for example, classifying authorities as 'high', 'medium' and 'low' in terms of environmental constraints to settlement growth. So, for example, a reduction to the requirement might be made for an authority (such as Sheffield) which had high constraints to settlement expansion but which received a requirement figure in excess of the urban potential. Conversely, those authorities that have fewer constraints to outward expansion may have their figure increased.

It would also be useful for the housing requirement figures to be presented by subregion and/or market area. We suggest this should also include the trend-based figures for those sub-areas as this will be an important check, particularly in terms of determining whether the levels of internal migration implied by the model outputs are realistic.

Question 15: How much difference should the reality checks make to the model outputs?

The reality check stage should, in our view, be regarded as an important stage in the process at which significant 'teeming and ladling' may be required. Some reapportionment is likely to be required between both market areas and districts within each area. We do not consider that a ceiling of say + or -15% would be appropriate.

Other Comments

Suggested Revised Model

A reworked version of Nathaniel Lichfield's housing requirement model is enclosed with these comments. The spreadsheet is not radically different to that proposed by the consultants and does not affect the formulas for apportioning the residual

requirement. It focuses on required or known additions and reductions to the overall housing stock. We believe this simplifies the overall calculation and, most importantly, removes the difficulties in working out the effect of demolishing vacant dwellings.

Preliminary Output Figures

We note the comment in Topic Paper 3a that, at this stage, it is important to focus on the assumptions which underpin the workings of the model rather than the output figures. However, we feel some initial comment on the outputs is, nevertheless warranted.

<u>South Yorkshire</u>; the initial requirement figures for the sub-region as a whole are over double the ONS projected requirement. This implies significant population migration to South Yorkshire from other parts of the region and it will be important that the final output figures are realistic in this respect.

Sheffield: the authority is keen to cater for its own household growth and is willing to accept further growth provided that this does not compromise the Green Belt boundary or HMR objectives. However, the highest figures suggested in Topic Paper 3a (2,180 dwellings/ year) would exceed the estimated urban potential by over 50% and we are concerned that a housing requirement of that scale could make significant greenfield allocations necessary towards the end of the RSS period. As already indicated, this would necessitate major alterations to the Green Belt and would result in unacceptable harm to important environmental assets.

We also doubt whether this level of development activity could be sustained. A requirement figure of 2,000 units per year would also be 50% above recent completion rates and a completion rate at that level has only been achieved once in the last 20 years (in 2002/03 due to completion of major apartment schemes in the City Centre).

<u>Barnsley</u>: the figures shown in Topic Paper 3a would be regarded as too low and are significantly below recent completion rates. ###

<u>Doncaster</u>: consider that the initial figures are far too low. The top end of the range gross fig of 820 is lower than the historic average build-rate which has been quite consistent over the last 20 years. The average rate over the period 1986 to 2004 was 859 dwellings per year, which is almost identical to that for 1998 to 2004 (856). Doncaster's view is that investment resulting from Finningley and other major transformational projects will increase market demand still further. A requirement figure which fails to reflect this will either unnecessarily frustrate economic growth or, more likely, result in increased commuting into Doncaster.

Rotherham: the net annual rates shown in Table 1 seem low, and substantially below the recent build rate of 833 per year (not 720 as shown in Table 3). This is especially true under Scenario A, presumably a contributing factor to this is the low economic change score given under Scenario A (presumably because of Rotherham being viewed as a low demand area).

However, the issue of demand is a complex one. Although Rotherham has indicators showing 'low demand' (and is partly covered by the HMR Pathfinder) it also has a low vacancy rate (despite completion rates in excess of the current requirement). These conflicting indicators may well be as a result of poor quality housing stock rather than low demand.

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Agenda Item 10

By virtue of paragraph(s) 5, 8 of Part 1 of Schedule 12A of the Local Government Act 1972.

Agenda Item 11

By virtue of paragraph(s) 5, 8 of Part 1 of Schedule 12A of the Local Government Act 1972.

Agenda Item 12

By virtue of paragraph(s) 5, 8 of Part 1 of Schedule 12A of the Local Government Act 1972.

Agenda Item 13

By virtue of paragraph(s) 9 of Part 1 of Schedule 12A of the Local Government Act 1972.