

Date: 27th June 2016
Consultee ID: 757874
Matter 2

ROTHERHAM LOCAL PLAN SITES AND POLICIES EXAMINATION

Matter 2: General Considerations

1. The following hearing statement is made for and on behalf of the Home Builders Federation. This statement responds to selected questions set out within Matter 2 of the Inspector's *Schedule of Matters, Issues and Questions* (examination ref: ID004).
2. The Inspector's Issues and Questions are included in bold for ease of reference. The following responses should be read in conjunction with our comments upon the submission version of the Local Plan, dated 9th November 2015. The HBF has also expressed a desire to attend the examination hearing sessions.

GC Issue 1 – Is the Council likely to propose changes to the publication plan?

Question 1) Has the Council agreed any proposed changes to the RSPD as a result of representations received on the publication plan? If so where are these recorded and in what form?

3. It is noted that in the initial response to the Inspector (examination ref: ID001) at point 2b the Council had not prepared any modifications at that stage. However examination document '*Schedule of Minor Amendments to the Publication Sites and Policies document*' (ref: SD20) does provide some relatively modest changes. The HBF does not raise issue with any of the proposed changes within SD20.

2) Do any of the proposed changes constitute Main Modifications rather than minor changes? Are any other Main Modifications likely to be proposed by the Council during the examination?

4. I refer to our response above and examination documents ID001 and SD20.

3) Does the Council wish the Inspector to make any proposed modifications that he considers are necessary to make the plan sound?

5. Examination document ID001, point 2a identifies that the Council wishes the Inspector to propose any modifications deemed appropriate to make the plan sound. The HBF supports such an approach.

4) Are there any statements of common ground or likely to be?

6. No comment at this stage.

GC Issue 2 – Is the Plan clear and comprehensible?

7. No further comments at this stage.

GC Issue 3 – Has regard been paid to national planning policy and guidance?

Question 1) Are there any policies or proposals in the Plan that do not sit comfortably with the National Planning Policy Framework?

8. As noted previously the HBF is concerned in relation to the housing requirement and the fact that the current evidence does not provide a figure for the Rotherham – Sheffield HMA, as required by NPPF paragraph 159.

Question 2) Are there are gaps in policy coverage? Have other policies been considered and discounted?

9. No further comments at this stage.

Question 3) Is there sufficient flexibility in each policy?

10. The HBF consider that greater flexibility should be provided in a number of policies, these are discussed in greater detail within our other hearing session statements. It is, however, considered important that the plan includes flexibility in the quantum of allocations provided to ensure that the RSPD can deal with any increase in housing need identified through an up to date assessment across the HMA.

GC Issue 4 - When is the RSPD to be reviewed?

Question 1) What is the timetable for a review?

11. The Council's 2015 Local Development Scheme identifies at chapter 2 that;

“Following adoption of the Site & Policies document, the Council may commence a review of the Local Plan. An indicative programme is included below but this is subject to confirmation and the availability of resources.”

This statement does not provide sufficient certainty that the plan will be reviewed. This is despite Core Strategy policy CS34 which required such a review to be undertaken once further evidence upon the objectively assessed housing needs of the Rotherham – Sheffield HMA were known.

12. The HBF recommend that a firm, time-limited, commitment to a review be provided. This review should not only take account of the needs across the HMA but also those of the wider city region and its plans for growth.

Question 2) Are parts of the plan to be reviewed before others?

13. The HBF consider this a matter for the Council to address but recommend housing needs and any further allocations be a high priority.

Question 3) Is there a case for delaying the RSPD until such a time as new housing and employment figures are available? What would be the implications of such an approach?

14. I refer to our response to Matter 1, Question 6. Such an approach would, however, delay the allocation of much needed sites within the RSPD this could slow down housing delivery within Rotherham. It is therefore considered preferable that the RSPD, alongside the Core Strategy be the subject of an early, time-limited, review clause to take account of the growth envisaged for the Sheffield City Region.

Question 4) Is there a commitment in the plan to a review?

15. I refer to our proceeding responses.

GC Issue 6 - Is the evidence base up-to-date and relevant?

Question 1) Are all studies of recent origin and take into account all material considerations?

16. No, as noted within our comments upon Matter 1, Question 6 evidence upon the objectively assessed needs of the Rotherham – Sheffield HMA is considered inadequate.

Question 2) Are there any important developments/changes since publication, for instance in terms of planning permissions/completions? How are these to be taken into account?

17. No further comments at this stage.

Question 3) Has any more evidence been compiled since the plan's publication?

18. No further comments at this stage.

Question 4) What base date is to be used for the housing, employment and retail figures to be considered during the Examination?

19. No further comments at this stage.

Yours sincerely,



Matthew Good
Planning Manager – Local Plans
Email: matthew.good@hbf.co.uk
Tel: 07972774229