

Rotherham MBC comments on the Wickersley Neighbourhood Plan,

Introduction

In preparing its comments the Council has had regard to the basic conditions that neighbourhood plans must satisfy¹. It has also had regard to National Planning Policy Framework (NPPF; July 2021²), in particular:

Paragraph 13: ...Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.

Paragraph 16: Plans should:

- a. be prepared with the objective of contributing to the achievement of sustainable development.*
- b. be prepared positively, in a way that is aspirational but deliverable;*
- c. be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- d. contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e. be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- f. serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).*

Paragraph 29: Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.

The comments also take account of the accompanying Planning Practice Guidance³ (PPG), in particular:

How should the policies in a neighbourhood plan be drafted?

A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared. (Paragraph: 041 Reference ID: 41-041-20140306)

The comments in this document are focused on the submission draft neighbourhood plan. Comments are provided separately on other submission and evidence base documents (namely Tables 3 and 4 Wickersley Neighbourhood Plan Appendix and the Design Code).

¹ <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

² <https://www.gov.uk/government/publications/national-planning-policy-framework>

³ <https://www.gov.uk/government/collections/planning-practice-guidance>

Schedule of comments

This schedule is in two parts:

- Table 1 (page 2): provides a summary of the Council's comments focused on the Community Aspirations and Development Management policies.
- Table 2 (page 3): contains the Council's detailed comments on the neighbourhood plan, including Community Aspirations and Development Management policies. Page numbers are given wherever possible to clarify the relevant part of the draft neighbourhood plan to which comments refer.

The schedule of comments is accompanied by one appendix

- Appendix 1: Local Wildlife Site Boundaries

Table 1 – a summary of the Council's comments focused on the Community Aspirations and Development Management policies

Policy / action	Concern	Proposed modification
Community aspirations 1-3	Remove or reword and include as an appendix (so it is clear that these are a community aspiration not land use policies). This is in order to avoid any confusion with land use policies.	Either delete or reword and include as an appendix
GP1 High Quality Design	Support subject to comments on design code	Support subject to comments on design code
GP2 Stone Walls		Support
GP3 Community Facilities and Services	There is an element of duplication of this policy in comparison to Core Strategy Policy CS29 which protects a range of community facilities, however Policy GP3 does identify locally valued facilities.	Support, with modifications
GP4 Locally Listed Buildings		Support
GP5 Design in the Conservation Area		Support
H1 House Type and Mix	Check plan for typographical errors (spacing issue in explanation text at para 6 p29).	Support, with modification
H2 Building for Life and Lifetime Homes		Support
H3 Sustainable Homes and Renewable Energy	It is considered Policy H3 replicates Local Plan policy to some extent but does provide some extra local detail.	Support, with modifications
GS1 Biodiversity and Green Infrastructure	Various modifications and map corrections are proposed.	Support, with modifications
GS2 Local Green Spaces	The proposed Local Green Space designations are not supported. These sites proposed already receive policy protection as either as Green Belt or Urban Green Space and in the absence of robust justification that: they are demonstrably special to a local community, hold a	Object, delete policy

Policy / action	Concern	Proposed modification
	particular local significance and the designation would offer additional local benefit then it is recommended the policy and supporting text is deleted.	
M1 Pedestrian and Cycle Connections	The aims of the plan with respect to pedestrian and cycle links to new developments are supported	Support
M2 Parking Solutions	The policy M2 mainly duplicates existing local plan policy/guidance is also contrary to usual planning practice in terms of garage size and driveway width dimensions proposed and should be deleted.	Object, delete policy
VC1 Licenced Premises		Support
VC2 Shop Frontage	Refence 'Rotherham Local Plan Supplementary Planning Document No. 6 Shop Front Design Guide'	Support, with modifications

Table 2 – detailed schedule of comments

Policy / action	Concern	Proposed modification
Throughout the document		
1.1.6 and after each Policy	Provide greater clarity on the way in which the Local Plan policies are referred to (i.e. 'Local Plan Policy' rather than 'RMBC Policy')	After each policy the plan highlights relevant local plan policies that they refer to as 'Relevant RMBC Policy' change to Relevant Rotherham Local Plan Policy'
Throughout the document	The design code needs to accommodate high quality innovative design. It should not duplicate and it should refer to the Rotherham Local Plan Supplementary Planning Document Householder Design Guide, this is in order to avoid confusion and promote clarity.	Modification proposed as outlined
Throughout the document	Typographical errors and consistency in use and explanation of abbreviations	Check plan for typographical errors
Contents List		
Contents	Complete the contents list	In contents list for item 1 include text as follows: '1.0 Introduction'
Contents	The contents list references '1.1 Map of WNP Plan Area' but this heading refers to a figure not a subheading.	Check contents list with plan text
Contents 1.7 Vision	Contents to reflect headings in text (and vice versa)	Change '1.7 Vision' to 1.7 Vision Statement' or correct text title

Policy / action	Concern	Proposed modification
Contents 1.8 Objectives	Contents to reflect headings in text (and vice versa)	The chapter title in the contents list should match that in the text change '1.8 Objectives' in contents list change to '1.8 Aims & Objectives' or change text title
Contents subheadings	Contents the contents list does not include all subheadings. Include all subheadings in the contents list where given for consistency	Include all subheadings in the contents list where given in the text
Contents List of figures	Provide a list of figures	Provide a list of figures on the contents list
Contents List of appendices	Provide the list of appendices in the contents list, stating it is a separate document and provide the name of each appendix.	Insert 'Wickersley Neighbourhood Plan Appendices (Separate Document)' on the contents page and name each appendix
Policies by theme		
Policies by theme (p5)	Typographical error 'GP4 - Locall Listed Buildings'	Change 'GP4 – Locall Listed Buildings' to 'GP4 - Locally Listed Buildings'
Policies by theme (p5)	Remove the list of appendices from the page entitled 'Policies by theme'	Remove the list of appendices
1.0 Introduction		
1.1.1	Refence Figure 1 in the text to add clarity	Change 'The Neighbourhood Plan covers the whole of the Civil Parish of Wickersley as indicated on the Boundary Map' to 'The Neighbourhood Plan Area includes the whole of the Civil Parish of Wickersley as indicated on the Boundary Map (Figure 1)'.

Policy / action	Concern	Proposed modification
1.1.6 explanation text	To add clarity	Suggest Change 'Relevant RMBC Policy' to 'Relevant Rotherham Local Plan Policy'
Figure 1	NB It is noted the map shows Wickersley Parish Neighbourhood Area	Point to note
Vision	Support the promotion of sustainability within the neighbourhood plan	Support
2.1 General Policies		
GP1 High Quality Design	Support subject to comments on design code	Support, subject to comments on design code
GP2 Stone Walls		Support
GP3 Community Facilities and Services	<p>There is an element of duplication of this policy in comparison to Core Strategy Policy CS29 which protects a range of community facilities, however Policy GP3 does identify locally valued facilities including post office, allotments and gardens, which are not specifically recognised in the Core Strategy policy.</p> <p>It would be helpful if the boundary map for asset B could be magnified for improved clarity (e.g. as a new insert)</p>	Support, with modifications
Figure 3	Typographical issue - Use of capitals in figure title	Change 'Figure 3 Community facilities and services' to 'Figure 3 Community Facilities and Services'
Explanation text (P23 para 8)	Typographical error - please check consistency throughout the plan when referring to policies normally there is no gap between the abbreviation SP and the policy number	Change 'This policy aligns with and builds on RMBC policy SP 45 by identifying buildings and structures to be included on a local list.' to 'This policy aligns with and builds on Rotherham Local Plan Policy SP45 by identifying buildings and structures to be included on a local list.'
GP4 Locally Listed Buildings	This policy is welcomed.	Support

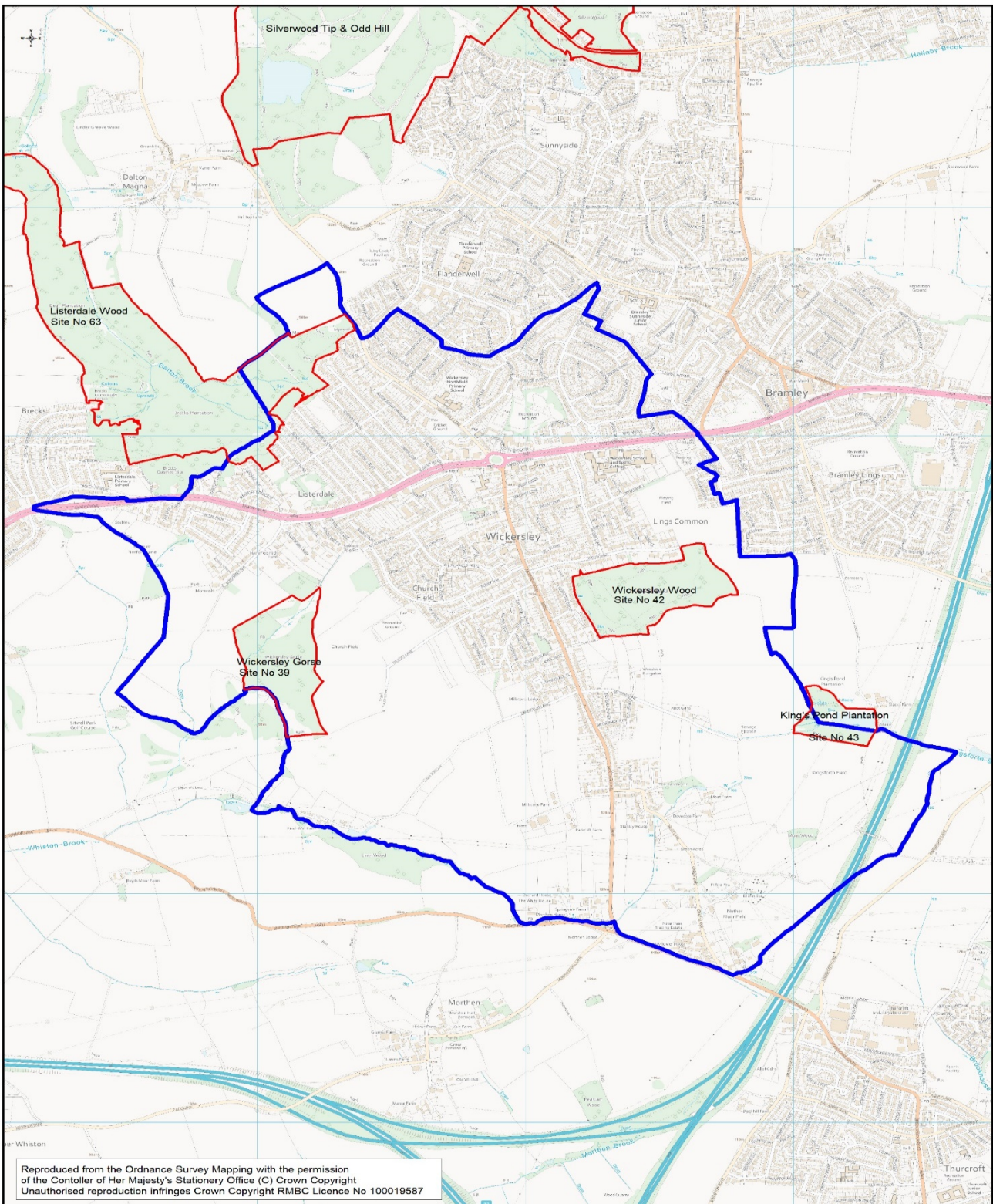
Policy / action	Concern	Proposed modification
Figure 4	Copyright disclaimer required on Figure 4	Figure 4 map 1 requires copyright disclaimer
GP5 Design in the Conservation Area	This policy is welcomed. It is hoped it will contribute greatly to the aim of preserving and enhancing the character and appearance of Wickersley Conservation Area.	Support
3.0 Housing		
3.1 (p28)	Provide abbreviation in brackets after the term is given in full upon its first appearance in the document; for clarity and consistency	Modification proposed: Give the abbreviation in full as follows : 'The full report is included as an appendix to the NDP 'change to 'The full report is included as an appendix to the Neighbourhood Development Plan (NDP)'
H1 House Type and Mix (Explanation text (para 6 p29)).	Typographical error: space before comma '...Houses aimed at first time buyers (168 responses) , and Smaller family homes (167 responses)'	Support with modification as indicated; check plan for typographical errors.
H2 Building for Life and Lifetime Homes		Support
H3 Sustainable Homes and Renewable Energy	It is considered Policy H3 replicates Local Plan policy to some extent but does provide some extra local detail. For further details on charging requirements reference should be made to Rotherham Local Plan Supplementary Planning Document No.12 Transport Assessments, Travel Plans and Parking Standards	Support, with modifications as outlined
4.0 Green Spaces		
Figure 9	<p>Wickersley Footpath number 5 on Sitwell Lane and Wickersley Footpath number 6 on Gill close are not connected when they are compared with the definitive statement; definitive details are available from RMBC Rights of Way (contact Planning Policy Team for an extract copy)</p> <p>On Figure 9 check the southern boundary of the Wickersley Gorse Local Wildlife Site (LWS) in relation to the track (see Appendix 1 Local Wildlife Site Boundaries)</p> <p>Typographical error 'Kings pond plantation' change to 'Kings Pond Plantation'</p>	Support, with modifications outlined

Policy / action	Concern	Proposed modification
	<p>'Urban green space' shown in relation to the figure; is considered to be a potentially confusing term; it in fact refers to a mixture of green belt and green space sites as shown on the Rotherham Sites and Policies Map.</p> <p>Consider expanding the content of Figure 9 to include more green infrastructure assets (such as Regionally Important Geological Sites, allotments, sports pitches etc). Consideration could be given to showing 'locally important Green Infrastructure Assets, Linkages and Networks' on a map, supported in the policy.</p>	
GS1 Biodiversity and Green Infrastructure	<p>Consideration could be given to ensuring that pitches/allotment opportunities are available to meet demand.</p> <p>Regarding Criterion D, what is the justification / evidence for replacing trees at the ratio suggested? In the absence of any justification then the requirement should be deleted.</p>	Support, with modifications
GS1 Biodiversity and Green Infrastructure Explanation text (p34)	On page 34 at the last bullet point delete reference to tree planting strategy as unclear what is required. In addition the neighbourhood plan policy should align with the emerging Rotherham Local Plan Supplementary Planning Document on replacement trees	Support with modifications It is considered that this policy repeats in part strategic policies in the Local Plan. Review references to tree planting
GS2 Local Green Spaces	<p>Delete proposed designations as Local Green Space</p> <p>The NPPF (para 102) gives criteria for the Local Green Space designation. This says the designation should only be used where the green space is demonstrably special to a local community and holds a particular local significance. It is considered that the proposed areas in the Neighbourhood Plan have not been sufficiently justified as being special and significant to the community.</p> <p>Practice Guidance states that consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space. (Paragraph: 010 Reference ID: 37-010-20140306). It is not considered that there is any evidence of any demonstrable additional benefit or additional protection in policy terms stemming from designation as Local Green Space.</p> <p>The proposed Local Green Space designations are not supported. These sites proposed already receive policy protection in the Local Plan as either as Green Belt or Green Space and in the absence of robust justification that: they are demonstrably special to a local community,</p>	Object, delete policy

Policy / action	Concern	Proposed modification
	<p>hold a particular local significance and the designation would offer additional local benefit then it is recommended the policy and supporting text is deleted. Should the examiner however decide that the policy and the proposed Local Green Space allocations are to remain in the Neighbourhood Plan then Figure 9 and 10 may be considered together in terms of green infrastructure.</p>	
5 Movement and Transport		
M1 Pedestrian and Cycle Connections	<p>The mention of provision of EV charging points is supported. Guidance on what this provision should involve is provided in the adopted Rotherham Local Plan Supplementary Planning Document No. 2 Air Quality and Emissions</p> <p>This provision is also reflected in the Rotherham Local Plan Supplementary Planning Document No. 12 Transport Assessments, Travel Plans and Parking Standards. It is also the intention that the Core Strategy Partial Update will include new policy on EV charging provision.</p>	Support
M2 Parking Solutions	<p>The policy M2, mainly duplicates existing Local Plan policy/guidance and is also contrary to usual planning practice in terms of garage size and driveway width dimensions proposed. It is considered its implementation would cause confusion and that the policy should be deleted.</p> <p>In respect of duplication of local plan policy please note existing guidance on cycle storage, EV charging points, Transport Assessments, Travel Plans and Car / Cycle Parking Standards are set out in Rotherham Local Plan Supplementary Planning Document No. 12 Transport Assessments, Travel Plans and Parking Standards.</p> <p>In respect of the policy being contrary to usual planning practice in terms of garage size and driveway width dimensions it is noted that Policy M2 differs from the usual dimensions that are accepted when considering applications for new development. These are in line with guidance given in 'Manual for Streets' and Rotherham Supplementary Planning Document No. 12 Transport Assessments, Travel Plans and Parking Standards.</p> <p>However, If the examiner is minded the policy should remain then it is suggested that the Policy is amended as follows:</p>	Object, delete Policy

Policy / action	Concern	Proposed modification
	<p><i>'POLICY M2: PARKING SOLUTIONS New developments are expected to comply with design guidance contained in the plan to produce design-led street layouts and parking solutions that provide in line with existing standards :</i></p> <ul style="list-style-type: none"> <i>• A) high quality and secure on-site cycle storage</i> <i>• B) EV charging points</i> <i>• C) the expected amount of parking spaces, sizes of garages and driveways</i> <i>• D) garages and driveways to the rear or side of properties in the same architectural style as the house they serve,</i> <p><i>Provision is to conform to Rotherham Local Plan Supplementary Planning Document No. 12 Transport Assessments, Travel Plans and Parking Standards or any future revised guidance.'</i></p>	
6.0 District Centre		
VC1 Licenced Premises		Support
VC2 Shop Frontage	Refence 'Rotherham Local Plan Supplementary Planning Document No. 6 Shop Front Design Guide'	Support
7.0 Community Aspirations		
CA1 Specialist Housing/ CA2 Tanyard Improvements/ CA3 Public Transport	Either delete these community aspirations or include them as an appendix (but reword them so it is clear that these are a community aspiration not land use policies in order to avoid any confusion). Wider community aspirations than those relating to the development and use of land should be made clear in the document that they will not form part of the statutory development plan.	Delete (or reword and move them to an appendix)
8.0 Monitoring and Delivery		
8.0 Monitoring and Delivery	Clarity is needed regarding plan monitoring in respect of the indicators to be utilised, the monitoring methodology, and any baseline data which will be available against which indicators will be considered. These should be identified in the Neighbourhood Plan.	Support with modifications (as outlined)

Appendix 1 Local Wildlife Site Boundaries



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