

Comment

Consultee	Mr Ryan Shepherd (538989)
Email Address	ryan.shepherd@rotherham.gov.uk
Company / Organisation	Rotherham Metropolitan Borough Council
Address	Planning & Regeneration Riverside House Rotherham S60 1AE
Event Name	Draft Dinnington Neighbourhood Plan
Comment by	Rotherham Metropolitan Borough Council (Mr Ryan Shepherd - 538989)
Comment ID	DNP33
Response Date	20/12/19 13:01
Status	Processed
Submission Type	Web
Version	0.1

Q1. To which document do your comments relate? Supporting Evidence - Local Green Spaces

Q2. Do you wish to? Object

Q3. Please provide your comments below making clear which part of the document you are referring to (specifying relevant paragraphs, tables, figures, boxes or appendices).

The guidance in NPPF at paragraphs 99 to 101 is clear that Local Green Space designation is only appropriate in limited circumstances. With regard to the evidence base document justifying the proposed designations the Council notes the requirement of paragraph 40 of the PPG section on neighbourhood planning (Reference ID: 41-040-20160211) that "Proportionate, robust evidence should support the choices made and the approach taken." The "Supporting Evidence" document does not appear to be robust. It also contains a number of subjective statements with little substantial detail or justification.

Dinnington High School Playing Fields

This proposed designation is not supported. The site is allocated for community use in the Local Plan and is subject to Policy SP62 Safeguarding Community Facilities. As such it is considered that the site enjoys existing policy protection and its inclusion is therefore contrary to aims set out earlier in the neighbourhood plan regarding such sites.

With regard to the site assessment form the following concerns are raised:

- . It is not considered that 'put forward by the community' is sufficient justification to demonstrate local significance of the Green Space. There is no indication of the scale of support (it could be suggested by one person, or it could have been suggested by 50).

- . The 'beauty' of the site is subjective and there is no indication of what 'some beauty' correlates to or means.
- . The Council disagrees with the conclusion that the site does not contribute to Local Plan strategic requirements. The Council considers educational sites, school and college playing fields and grounds will not be suitable for designation. The NPPF states that local planning authorities should give great weight to the need to create, expand or alter schools (paragraph 94). In order to address future needs for school places there may be a need to reconfigure the arrangement of school buildings and playing fields.
- . With regard to this, the Council is aware that LEAP Multi Academy Trust which runs Dinnington High School has also raised concerns in its representation that the proposed Local Green Space "...could severely fetter any reasonable opportunities to invest in the school for the benefit of its pupils". It notes that "Organisations including Sports England would be involved in relevant processes to safeguard the school's green spaces. It is believed there are sufficient checks and balances under the existing arrangements."
- . The proposed designation could limit the ability of the school to undertake reconfiguration in the future, should this be required, contrary to strategic policies in the Local Plan (in particular Policy CS29 Community Facilities and Policy SP62 Safeguarding Community Facilities). Any need to reconfigure the school could also occur in the longer term, beyond the current Local Plan period (2013 – 2028), and the Council is mindful that designation as Local Green Space could remove this option. Designation therefore may not be in conformity with national planning guidance which states that Local Green Space must be capable of enduring beyond the plan period (NPPF paragraph 99).

Leys Lane Pocket Park

This proposed designation is not supported. The site is allocated in the Local Plan as Green Belt. NPPF indicates that policies for managing development within a Local Green Space should be consistent with those for the Green Belt (paragraph 101). As such it already benefits from policy protection equivalent to that which designation as Local Green Space would offer, including Policy CS 4 Green Belt, and Policy SP 2 Development in the Green Belt.

In such cases Planning 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 the supporting evidence document provides any evidence of any demonstrable additional benefit or additional protection in policy terms stemming from designation as Local Green Space.

With regard to the site assessment form the following concerns are raised:

- . It is not considered that 'put forward by the community' is sufficient justification to demonstrate local significance of the Green Space. There is no indication of the scale of support (it could be suggested by one person, or it could have been suggested by 50).
- . The 'beauty' of the site is subjective and there is no indication of what 'some beauty' correlates to or means

Lodge Lane Recreation Ground

This proposed designation is not supported. The site is allocated in the Local Plan as Green Belt. NPPF indicates that policies for managing development within a Local Green Space should be consistent with those for the Green Belt (paragraph 101). As such it already benefits from policy protection equivalent to that which designation as Local Green Space would offer. Furthermore it is also protected through Policy CS 4 Green Belt, Policy SP 2 Development in the Green Belt, and Policy SP 38 Protecting Green Space.

In such cases Planning 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).

Whilst recognising the value of the site in recreational terms, it is not considered that the supporting evidence document provides any evidence of any demonstrable additional benefit or additional protection in policy terms stemming from designation as Local Green Space.

With regard to the site assessment form the following concerns are raised:

- . It is not considered that 'put forward by the community' is sufficient justification to demonstrate local significance of the Green Space. There is no indication of the scale of support (it could be suggested by one person, or it could have been suggested by 50).
- . The 'beauty' of the site is subjective and there is no indication of what 'some beauty' correlates to or means

Corner of High Nook Road and Keats Drive

This proposed designation is not supported. It is allocated for residential use in the Local Plan, but comprises an area of incidental Green Space. As such these incidental green spaces benefit from the protection of Policy SP38 Protecting Green Space. This clarifies that "Development that will result in the loss of small incidental areas of green space, not specifically identified on the Policies Map, but which make a significant contribution to the character of residential areas and / or green infrastructure, and function as a facility for the benefit of the local community, will not normally be permitted."

With regard to the site assessment form the following concerns are raised:

- . It is not considered that 'put forward by the community' is sufficient justification to demonstrate local significance of the Green Space. There is no indication of the scale of support (it could be suggested by one person, or it could have been suggested by 50).
- . The 'beauty' of the site is subjective and there is no indication of what 'some beauty' correlates to or means
- . Reference is made to formal use of the site, with football given as an example; however no evidence is provided that the site includes formal pitch markings or equipment. As such it is considered that any activities undertaken on the site are of an informal nature only.

The Council considers that a Local Green Space designation is unwarranted, given that adequate protection already exists under Policy SP38. As a result, the designation conflicts with the approach set out in the draft Neighbourhood Plan which refers to not seeking to duplicate protections where sites are already protected through Policies in the Rotherham Local Plan.

The Council is not convinced that the site meets the criteria for designation as set out in the NPPF (in particular paragraph 100(b)) since there does not appear to be any robust evidence that it is demonstrably special or holds particular local significance . Indeed, it does not appear to the Council to differ from other areas of incidental green space within the parish not identified for designation.

Refer also to the Council's separate representation on the submission draft neighbourhood plan.

Q4. Suggested modifications. If you consider that amendments should be made then it will be helpful if you could put forward any suggested wording changes.

Delete the policy and supporting text relating to Local Green Spaces. Refer also to the Council's separate representation on the submission draft neighbourhood plan.

Q5. Do you wish to be notified of the Council's decision under Regulation 19 of the Neighbourhood Planning Regulation 2012 whether to accept the Examiners' recommendation? (please tick)

. Yes, please notify me of the Council's decision