



The Planning
Inspectorate

Report to Doncaster Metropolitan Borough Council

by Richard E Hollox BA BSc(Econ) MPhil FRTPI FRICS

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 26 March 2012

**PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)
SECTION 20**

**REPORT ON THE EXAMINATION INTO DONCASTER COUNCIL'S CORE
STRATEGY 2011-2026 – SUBMISSION VERSION
DEVELOPMENT PLAN DOCUMENT**

Document submitted for examination on 29 July 2011

Examination Hearings held between 29 November and 15 December 2011

File Ref: PINS/F4410/429/3

Abbreviations Used in this Report

AA	Appropriate Assessment
AMR	Annual Monitoring Report
BREEAM	Building Research Establishment Environmental Assessment Method
CCQ	Civic and Cultural Quarter
CfSH	Code for Sustainable Homes
CIL	Community Infrastructure Levy
DMUA	Doncaster Main Urban Area
DPD	Development Plan Document
ECML	East Coast Main Line
ELR	Employment Land Review
FARRRS	Finningley and Rossington Regeneration Route Scheme
IDP	Infrastructure Delivery Plan
IDS	Infrastructure Delivery Schedule
LDF	Local Development Framework
LDS	Local Development Scheme
LEA	Local Economic Assessment
MM	Main Modification
mt	Million tonnes
NPPF	National Planning Policy Framework
PHV	Post Hearings Version
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
RHADS	Robin Hood Airport Doncaster Sheffield
R(S)S	Regional (Spatial) Strategy
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SRFI	Strategic Rail Freight Interchange
UDP	Unitary Development Plan
WRW	White Rose Way

Non-Technical Summary

This Report concludes that the Doncaster Council Core Strategy 2011-2026 Development Plan Document (DPD) provides an appropriate basis for the planning of the Borough over the next 16-17 years providing that a number of modifications are made to the plan to make it sound. The Council has specifically requested that I recommend any modifications necessary to enable it to adopt the Plan.

The modifications can be summarised as follows:

The plan period is modified to 2011-2028;

In releasing land for strategic warehousing, priority will be given to the proposed Strategic Rail Freight Interchange (SRFI) at Rossington during the 5 year period from the adoption of the Core Strategy.

Introduction

1. This Report contains my assessment of the Doncaster Council Core Strategy 2011-2026 Development Plan Document (DPD) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers whether the DPD is sound and whether it is compliant with the legal requirements. Planning Policy Statement (PPS) 12 (paragraphs 4.51 to 4.52) makes clear that to be sound, a DPD should be justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the version which was submitted to the Secretary of State on 29 July 2011 (Submission Version).
3. My Report deals with the Main Modifications that are needed to make the DPD sound and legally compliant and they are identified in bold in the Report (**MM**). In accordance with Section 20(7C) of the 2004 Act, the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound and thus incapable of being adopted. These Main Modifications are set out in the Appendix.
4. The Main Modifications that go to soundness have been subject to public consultation either at the Hearings or for a period of 6 weeks and I have taken the consultation responses into account in writing this Report. The Council published a Post Hearings Version (PHV) of the Core Strategy on 19 December 2011 setting out a considerable number of Additional Modifications which, in essence, provide updating and clarification. Mostly they arise from discussions at the Hearings and negotiations between the Council and other participants. As agreed at the last Hearing on 15 December 2011, the date for the receipt of representations was set for 16 January 2012.
5. For the most part, these representations propose changes to the drafting of policies and their supporting text. My recommendations concerning Main Modifications will make the Core Strategy sound and so those representations which do not relate to the Main Modifications would not make an unsound plan sound. Nevertheless, the Council will no doubt consider all of them, particularly those which refer to cartographical and drafting errors and omissions, and make any further additional modifications arising from them.

Assessment of Soundness

Preamble

6. At the time of writing, the Regional (Spatial) Strategy (RSS) has not been revoked and so it remains part of the development plan for the Borough. The National Planning Policy Framework (NPPF) is still in draft form, albeit consultation has taken place on it. Limited weight should be attached to it. Planning Policy Guidance (PPG) and Planning Policy Statements (PPS) are still extant and I have taken them into account in my examination of the Core Strategy.

Main Issues

7. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings, I have identified 8 main issues upon which the soundness of the Core Strategy depends.

Issue 1 – Whether the Core Strategy's proposals for sustainable growth are clear, sufficiently justified, effective and consistent with all relevant national policy

Introduction, Vision and Objectives

8. The Introduction in the Core Strategy concisely sets out the policy context, with reference to national and regional policy, and a brief summary of the development plan and management system. The reference to the dramatic reduction in public spending and the need for wealth creation is a timely reminder to all concerned.
9. The history of the town and its surroundings is well explained. The settlement pattern in this, the largest in area of the country's metropolitan boroughs, with a concentration of people in Doncaster, a number of small market towns and a generally dispersed arrangement of villages and hamlets, results mainly from the locational needs of heavy industry, agriculture and mining. More recent, large scale development is clear to see on the outskirts of Doncaster, at the warehousing and similar buildings close to Motorways and at the business and housing development at and near Robin Hood Airport Doncaster Sheffield (RHADS).
10. The Core Strategy briefly, but adequately, identifies the main problems of the Borough. These include the dispersed settlement pattern, relatively high unemployment with few employment opportunities in highly productive sectors of the economy, some deprived areas, an ageing population with increasing needs and land in need of regeneration. It also identifies its assets. These include its historic and natural environment, its good location on the national rail and motorway network and its abundant resources particularly limestone, sand, gravel, coal, natural gas, clay and coalmine methane. Its 3 distinctive strengths are rightly described as its people, its connectivity and its local attractions.
11. The Vision for the Borough is wide ranging and ambitious, but in view of its considerable assets and potential and the length of the plan period, there is no reason why the Core Strategy should not successfully provide the spatial context and make the vision realistic and achievable. Much will inevitably depend upon substantial public and private investment during the next 16-17 years, and therein lies uncertainty. The Objectives nevertheless rightly take account of the Chancellor's Budget and Autumn Statement 2011, the "Plan for Growth" and the Written Ministerial Statement "Planning for Growth" by emphasising economic engagement, seeking to attract investment, diversifying the local economy and acknowledging the role of house-building in creating wealth.
12. The Objectives highlight the need to safeguard and enhance the environment, locating most new homes, jobs and services in or at existing towns to support

economic growth and investment, job creation, environmental improvements, services and facilities. They also seek to increase the efficient use and safeguarding of natural resources and to enhance the historic and natural environment. These, amplifying the Vision, are the basis for a balanced approach between development and conservation and accord with national policy, especially in Planning Policy Statement (PPS) 1 for sustainable development.

The Proposed Settlement Hierarchy

13. The Core Strategy proposes one Sub-Regional Centre (Doncaster), 6 Principal Towns (Thorne, Mexborough, Conisbrough, Adwick including Woodlands, Armthorpe and Askern) 2 Potential Growth Towns (Rossington and Stainforth & Hatfield including Dunscroft & Dunsville), 4 Renewal Towns (Denaby, Edlington, Carcroft/Skellow and Moorends), 2 Conservation Towns (Tickhill and Bawtry), Defined (larger) Villages and Undefined (smaller) Villages. This is a more complex hierarchy than appears in many development plans and it has attracted some criticism on grounds of confusion. But it is justified.
14. It reflects key considerations like the nature of the existing settlement pattern, the location of existing population and range of services, the urgent need to renew and regenerate outworn areas and national and Regional policies. The thrust of these policies is to foster global sustainability by addressing the causes and potential impacts of climate change through measures which reduce energy use and emissions (for example by encouraging patterns of development which reduce the need to travel by private car), by encouraging rail freight transport and by promoting housing in suitable locations which offer a good range of community facilities and with existing and/or future good access to jobs, key services and infrastructure.
15. Table P2.1 in the PHV shows the broad locations and their expected amounts of housing throughout the Borough during the plan period. Rightly, bearing in mind such matters as its range of services and RSS Policy YH4, the Doncaster Main Urban Area (DMUA) will be the main focus for growth and regeneration for housing, employment, shopping, leisure, education, health and cultural facilities. The indicative housing allocation is 9,225-11,808 dwellings, but the assets, challenges and potential of the town require a figure at or very near the top of that range.
16. Two Principal Towns are identified in RSS Policy YH5, Thorne (11,387) and Mexborough (14,750), but not necessarily to the exclusion of others. Apart from Doncaster, they should be the main local focus for housing, employment, services and facilities. The Doncaster Settlement Study Review (February 2011) notes that Thorne is the most important service centre in the north east of the Borough. Its assets include 2 railway stations, good connections to the major road network, a frequent bus service to Doncaster, medical facilities, 3 primary schools and a secondary school. For its size, it has a wide range of retail, leisure and other services and facilities. In the summer of 2010 there was a worrying number of vacant buildings, and maybe a significant amount of additional development at about the top of the indicative range of 646-923 dwellings and its retention as a Principal Town would bolster the retail offer and other facilities.

17. Mexborough is described in the Doncaster Settlement Study Review (February 2011) as the most important service centre in the Dearne Valley. There is a 20 minute train service to and from Sheffield, Rotherham and Doncaster. During the day, buses connect to Doncaster about every 15 minutes and to Rotherham every 30 minutes. Classified A roads provide access to Doncaster. There are 2 doctors' and 5 dentists' surgeries, 7 infants/junior/primary schools and one secondary school. As the second largest town in the Borough, it has a wide range of retail, leisure and other facilities in proportion to its size. There is a number of employment and similar sites within and just outside the main built up area. The Study Review notes that the recession has affected vacancy rates, but it is still one of the most vibrant service centres in the Borough. It is rightly identified as a Principal Town and should achieve a growth at about the top of the indicative range (646-923 dwellings).
18. The 4 other Principal Towns identified have fewer facilities. Conisbrough (11,370), like Mexborough, has a railway station on the Sheffield-Doncaster line. Adwick (8,843) is also served by rail. There are bus services from Doncaster to all 4 of these Principal Towns. All 4 have medical services, dentists and schools. The range of shops and other facilities falls a good deal short of that at Thorne and Mexborough, but the size of these settlements, the services and facilities which they offer and their character, role and appearance as small towns rather than large villages should ensure their retention as Principal Towns. The evidence for this conclusion is compelling, and they should be suitable for a level of growth towards the bottom end of the indicative range (646-923).
19. The Council estimates that the DMUA and the Principal Towns should accommodate about 80-85% of the total housing provision. That makes good sense. Sites will presumably be found within and, where necessary, adjacent to the main built-up areas as urban extensions. In addition, it is reasonable to suppose that the 2 Potential Growth Towns could each accommodate 1200 or so dwellings in line with a co-ordinated approach to major new infrastructure provision, regeneration and job creation. In view of the substantial regeneration opportunities at Stainforth and Hatfield (19,205) (including Dunscroft & Dunsville), that indicative figure should be regarded at this stage as provisional, and a minimum. Indeed, the PHV paragraph 3.28 states that projects in these 2 Towns could continue to deliver further housing and economic growth beyond the plan period, consistent with their eventual re-designation as Principal Towns through a review of the Core Strategy.
20. The range, number and type of services and facilities in the 4 Renewal Towns is generally more limited than in the Principal Towns and so they are suitably identified for regeneration and housing renewal, not for market-led growth. A total of up to 1660 dwellings between them is proportionate, and should serve to consolidate and enhance local services.
21. The emphasis in the 2 Conservation Towns is on conservation and enhancement. Quality infill within existing settlement boundaries is intended. This is the right approach. Large scale development could detract from the character or appearance of these attractive, historic towns and divert attention from places elsewhere in the Borough more suitable for it, for

reasons which include location, transport services and the need for regeneration.

22. Very little development is intended for the villages where services and facilities are relatively few in number. Otherwise, there would be more reliance on private transport to get to jobs, shops, schools and other attractions, contrary to national policy. It, too, could divert attention from places where growth would do more good.
23. Finningley, though near RHADS, has a relatively limited range of services and facilities when compared, for example, with the Principal Towns. There is no justification for changing its status, as is requested, from a Larger Defined Village. Planning permissions have recently been granted for a substantial amount of residential and employment development at RHADS. The Core Strategy acknowledges its importance to the local economy and it does not prevent in principle the further development at a suitable scale and on suitable sites at this location, as the PHV Policy 6 and Table 2.2 confirms. As the Council states at the Hearing concerning employment and economic development, its strategy for growth includes providing for business development related to RHADS on the west side of the Airport plus cargo and maintenance around the south side of the runway. There can be no doubt about the Council's commitment, as set out in the Core Strategy, to RHADS.
24. The indicative housing provision in PHV Table P2.1 would result in about 21,250 dwellings during the plan period up to 2028. This is based upon the maxima for the DMUA, Thorne and Mexborough, towards the minima for Conisbrough, Adwick (including Woodlands), Armthorpe and Askern, at least 1200 each for the 2 Potential Growth Towns, 1660 for the 4 Renewal Towns and a few hundred or so to be shared between the Conservation Towns and the Defined Villages as opportunities for suitable infilling arose. To the Defined Villages should be added the 750 dwellings recently permitted at Finningley. This equates to an annual average of 1,250 during a 17 year period.
25. There are requests for substantially more development at a number of these settlements outside the DMUA, but this would serve to divert attention from the needs, challenges and opportunities in Doncaster which should be the prime focus for investment. The Core Strategy rightly acknowledges such potential issues as Green Belt, flood risk, settlement coalescence, lack of well-located previously-developed land and loss of countryside. These matters must be the subject of consultation and a thoroughly detailed assessment in the preparation of the Sites Allocations DPD. Many other settlements need some growth for a variety of reasons, but the Council has struck the right balance at this Core Strategy stage between competing objectives.
26. The settlement hierarchy is based upon a robust evidence base. Much of it is from the Settlement Study and supplemented by the Council's detailed knowledge of these places, both members and officers, their assets and needs, and its officers' discussions and negotiations with stakeholders. Inspections during the course of the Examination have been of vital importance. The housing allocations are no more than indicative, and so further work will have to be carried out to ascertain the extent to which these

settlements can accommodate the scale of development envisaged for them, taking account of extant planning permissions. And so, again, this means a thorough assessment of site suitability, bearing in mind such issues as Green Belt, flooding and its insurance implications, agricultural land quality, roads and traffic, existing and proposed infrastructure, village plans and the incidence of well located previously-developed land. This should lead to the identification of sites in the Site Allocations DPD and thus the more precise location and amount of land for development.

27. The provision of infrastructure should be phased in such a way that it did not undermine the viability of a development as a whole. That is a key consideration in the case of DN7 where the private sector is being expected to provide infrastructure to include the M18 Link Road, a rail/bus interchange and to deal with flood risk and drainage issues. All these matters imply a comparative analysis of competing, realistically alternative sites at Hatfield, Stainforth, Dunscroft and Dunsville and maybe a compromise between competing objectives, especially those of giving priority to well-located previously-developed land, minimising the risk of flooding and those likely to emerge in the consideration of any urban extensions.
28. Put another way, the risk of flooding of land in a Flood Zone 2 or 3 need not necessarily preclude its development or its deliverability; much might depend upon measures to reduce that risk to an acceptable level. Even though a good deal of work has been undertaken on a number of sites, including DN7 where there has been a considerable amount of consultation and agreement between relevant interests leading to the Stainforth and Hatfield Development Framework, it would not be prudent at this stage to define a specific site or sites on the Key Diagram.
29. The Core Strategy makes clear spatial choices about where housing, its scale and associated developments should go in broad terms. With the retail hierarchy and the broad locations for employment, it steers the clearly stated amount growth to where it would be most effective in supporting sustainable communities, urban renaissance, regeneration, housing renewal and promoting sustainable economic growth.

Options and appraisals

30. The Core Strategy has evolved since June 2005 through a lengthy process of defining Options which led to Preferred Options and Scenario Testing. Thus 3 Options have been rigorously tested with 10 Themes together comprising 32 Issues. Subsequently, Additional Options have been tested to establish whether the Core Strategy should depart from the RSS. This continuing assessment convincingly demonstrates that the Core Strategy conforms generally with the RSS strategy and national policy.
31. It has been the subject of a Sustainability Appraisal and numerous stages of consultation, including such statutory consultees as English Heritage, Natural England, the Highways Agency and the Environment Agency. Locations for growth have been tested using a range of sustainability criteria, including effect on the historic environment, biodiversity and the natural environment, good quality agricultural land and flood risk. The evidence and the thorough nature of the testing throughout is compelling and results in a sustainable

approach to development in terms of scale and broad locations. The Core Strategy suitable refers to, and provides a sound basis for, the preparation of subsequent DPDs, particularly the Site Allocations DPD.

The Green Belt and Countryside

32. Policy 3 in the PHV makes a clear and welcome distinction between the Green Belt, where national policy for its protection will be applied, and the countryside generally in the eastern parts of the Borough where a Countryside Protection Policy Area will be applied. In considering the Green Belt, it must be borne in mind that the Government attaches great importance to Green Belts, as expressed in PPG 2 and the draft NPPF. Their general extent should be altered only in exceptional circumstances.
33. The general extent of the Green Belt in the western and southern parts of the Borough is carried forward from the Unitary Development Plan (UDP) and indicated on the Key Diagram. Its retention as defined accords with the RSS which proposes no change to the general extent of the South Yorkshire Green Belt which serves to prevent the merging of the large urban areas of Doncaster, Rotherham, Sheffield, Barnsley and Wakefield. The Countryside Protection Policy applies to an area beyond this conurbation and so would not fulfil this purpose. The Policy should for the most part do what it says, but be flexible enough to allow for certain of the Borough's development needs. This is a sound approach.
34. There are calls for the Core Strategy to include a comprehensive review of the Green Belt. On the evidence, however, including that of the Strategic Housing Land Availability Assessment (SHLAA), it would appear that the amount of growth proposed can be accommodated in sustainable locations without any effect upon the general extent of the Green Belt. Some minor adjustment to it might be justified in accordance with Policy 3A), at Adwick for example, in accordance with RSS Policy YH9 B and paragraph 2.62 which provide for localised reviews of Green Belt boundaries which may be necessary in some places to meet identifiable development needs. There is no need at this stage for the requested review. Maybe it will be necessary in 5 years time or thereabouts when the Core Strategy itself is reviewed. The Council may, however, wish to consider whether it should be comprehensively reviewed as part of the Site Allocations DPD.

Planning and transport

35. National policy emphasises the strong links between these 2 matters. Development plans should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near public transport interchanges. That is precisely what the Core Strategy seeks to achieve. Some dispersal will take place as, for example, warehousing close to Motorways to benefit from the Borough's advantage of easy access to the major road network and to boost employment in the logistics sector. Nevertheless, whereas in 2001 16% of the Borough's population lived in the villages and 39% in the DMUA, the Core Strategy proposes 0-1% of new homes in the villages and 50-64% in the DMUA. In this way, the Core Strategy seeks to change the pattern of development to

ensure better access to services and especially public transport. This is a vital aspect of sustainable development.

36. Public transport services, especially their frequency, are matters more for the operators than the local planning authority. The Core Strategy's objectives, however, include making the best use of the excellent road, rail and canal links and future transport developments and to address environmental issues including climate change. A good example of the way forward is the well-integrated bus, rail, taxi and parking arrangements at Doncaster Rail Station, close to the Frenchgate Shopping Centre and the rest of the town centre. This, alone, is a good reason for promoting a substantial percentage of the total growth envisaged in the DMUA. There is no doubt that the Council will continue to liaise with public transport operators, particularly in the case of those broad locations where growth is proposed, to promote good access to safe, convenient and frequent bus and train services.

Publication date of survey material

37. There is some criticism about the age of some survey material, and hence its relevance. Ideally, some of the more dated survey material would have been produced more recently. Nevertheless, as PPS 12 paragraph 4.37 states, the evidence should be as up-to-date as practicable having regard to what may have changed since it was collected. That has been the Council's approach. None of the evidence is so out-of-date as to render it irrelevant, and the Examination of the Core Strategy has been an opportunity for participants to comment on it and to provide further useful information which has been taken into account.

Climate change

38. The former Prime Minister, the Rt. Hon. Tony Blair MP, stated *Climate change represents a potentially catastrophic threat, but it is within our control to address it – and address it we must*. The Government accepts that there is a compelling scientific consensus that human activity is changing the world's climate, particularly as a result of man-made emissions, and it is in that context that the Core Strategy should be examined. The Council rightly notes that climate change can be addressed in different ways as new technology and more detailed information on emissions and their implications become available.
39. The Core Strategy responds to these challenges by including a degree of flexibility in certain of its policies. For example, Policy 14: Design and Sustainable Construction requires all new developments to secure at least 10% of their total regulated energy from decentralised and renewable or low carbon sources. It expects new residential development to meet relevant Building for Life criteria (14/20 criteria for schemes of more than 10 dwellings), with an agreed proportion designed to Lifetime Homes Standards, subject to design and viability considerations. Proposals should also achieve CfSH Level 3 and new non-domestic buildings must meet the BREEAM "Very Good" rating. The evidence is that the Council has been successful in meeting these requirements with recent schemes, but flexibility is likely to be required in considering proposals for Listed Buildings, as the Council accepts.

40. The Core Strategy includes no specific policy on sustainable development or climate change, but it takes a much better, holistic approach by setting a vision and defining objectives from which the strategy and clear policies are derived. In this way, it accords with the Key Planning Objectives set out in the Supplement to PPS 1, including the delivery of a pattern of urban growth which helps to secure the fullest possible use of sustainable transport. Table 6 (PHV Table 3) Monitoring and Delivery outlines a number of indicators related to climate change, and some will be more difficult to monitor than others. Nevertheless, this comprehensive table will be a useful basis for checking the progress of the plan against such targets as for sustainable construction and renewable energy, and this should assist the Council in ensuring that the sustainability credentials of the Core Strategy are not compromised.
41. Related to this issue are measures to improve the energy efficiency of the existing housing stock and thereby reduce fuel poverty. More than 30,000 dwellings, including social housing, have benefited from energy saving measures which the Council has promoted. Its Corporate Plan sets a target to assist another 2,000 households in 2011/2012 and thereby reduce fuel poverty in 1,000 households. It is currently scoping a local low-carbon and renewable energy potential study to form part of the LDF evidence base for policies and targets for subsequent DPDs. This is all good evidence of the Council's commitment to address this threat, and the Core Strategy is in tune with it.

Period of operation

42. As the Council agrees, the plan period should be up to 2028. This accords with national policy in PPS 12 that the time horizon of the Core Strategy should be at least 15 years from the date of its adoption. This is a Main Modification - MM1. As set out in the Appendix, the title of the Core Strategy at its page 1 should be:

Doncaster Council Core Strategy 2011-2028

This Main Modification would embrace all the consequent additional modifications in the Core Strategy relating to the extended plan period.

Conclusion

43. The Core Strategy includes an overall vision which sets out how the area and the places within it should develop. It clearly explains its proposals for sustainable growth. There is no doubt where developments will go in broad terms and the scale of growth indicated. The proposals are sufficiently justified by a robust evidence base. There are strategic objectives for the Borough which focus on the key issues to be addressed. The Core Strategy is effective in achieving a sustainable pattern of development and consistent with all relevant national policy for addressing the urgent matter of climate change. In these crucial respects, the Core Strategy is sound.

Issue 2 – Whether the Core Strategy is effective in meeting local housing needs, including the provision of an appropriate mix of housing of suitable quality and at suitable densities

The housing target

44. The Core Strategy PHV proposes a net annual housing target of 1230 dwellings during 2011-2028, a total of 20,910. This is in line with the RSS, and is a significantly higher target than one based on the 2010 DCLG published household formation projections. As the RSS states, it is based upon a range of evidence and debate, taking account of such considerations as the needs of the Regional economy, the availability of suitable land, house completion rates, household projections (DCLG 2003-based and 2004-based) and the likely impact on transport and other infrastructure. It is therefore a fully tested evidence base.
45. These projections are now of some vintage and the Council, acknowledging the low rate of completions in recent years, consulted on various Options for future annual targets. Although some respondents opted for a figure higher than in the RSS, the majority supported it. In view of the need to be practical about the availability of survey material and its date, the role of the RSS as part of the development plan, the need to encourage more house-building in the Borough than has taken place in recent years and the contribution which house-building makes to the wider economy, the annual target in the Core Strategy should be accepted.
46. The national and local economy is generally fragile at present, mortgage finance is restricted and the annual target of 1230 dwellings may prove to be more aspirational than realistic, especially during the first 5 years or so of the plan period. This target is a good deal higher than has been achieved in most of the recent years. During 1986-2004 and 2004-2011 average gross completions were 859 and 732 respectively. For the latter period, the net completions were 520, there being 212 demolitions. Within those averages, there were 1,486 gross completions in 1998/99 but only 141 net completions in 2009/10. It is alleged that the underperformance is due to the unavailability of suitable land, particularly Green Belt and other greenfield land with few if any physical constraints, but it is doubtful whether that is the only factor. Limited mortgage finance, concerns about job security, family incomes and the general economic climate, especially during recent years, are likely to have played an important part.
47. In view also of recent completion rates, a housing land allocation to accommodate the 1230 annual target should provide a significant degree of choice of sites for the housing market. Once the allocations are made, it would therefore be reasonable not to make any allowance for the shortfall in completions up to 2011. There is criticism that the 5 year deliverable housing land requirement will be calculated using average completion rates during the plan period. The approach is explained in the PHV paragraph 5.5. There is a danger that any deficit in numbers would be compounded as any shortfall is repeated one year after another, but the Core Strategy is not seeking to prevent the delivery of at least 1230 dwellings annually, assuming that this

target remains during the life of the plan. Indeed, the Council acknowledges the important role of housing in the creation of employment and wealth.

48. The regional Econometric Model forecast of total new jobs during the plan period is 35,756. The Oxford Economic methodology suggests that the 18,450 new homes by 2026 in the Core Strategy Submission version would generate an increased population of 37,048, an increased working age population of 25,933 and (assuming a working rate of 80%) a jobs requirement of 20,747. Assuming an additional 8% of the 2011 base working age population will be working to meet the 80% forecasted, this would generate a requirement for 14,179 additional jobs. A reversal in commuting patterns would be expected to generate a requirement for another 1,500 new jobs. The jobs total using the various models is therefore $20,747 + 14,179 + 1,500 = 36,426$, leading to a reasonably close correlation between the jobs growth forecast and the housing target. It is alleged that this forecast and the target is out of balance, and that more than 1230 dwellings each year are required to match the envisaged growth in jobs. That may eventually be proved true, but bearing in mind the length of the plan period, the need to review it on a regular basis and the fact that the forecasting over a long period of population, housing requirements and jobs is an inexact science, any imbalance which might arise in the future does not make the present Core Strategy unsound.
49. The marked difference between recent average annual completions and the Core Strategy's target should accommodate the Council's aim of substantially increasing housing delivery in accordance with its achievement of Growth Point status in 2008, its promotion of the economy, its fostering of more jobs for local people and its encouragement of residential development as a stimulus for regeneration. It would help to remedy any shortfall and accord with the Government's intention to boost the supply of housing as a catalyst for growth in the economy, as set out in the draft NPPF paragraph 109, and to take account of migration into the Borough. There are calls for an even higher housing target. This would result in the allocation of more land, presumably all too often greenfield sites which would not necessarily accord with the important objectives of recycling well-located previously-developed land and the regeneration of outworn areas as part of the overall strategy of growth. Maybe things will change in the next 5 years or so when the Core Strategy is expected to be reviewed. In the meantime, although it adopts the somewhat ambitious RSS annual target and relies on RSS information of some age, it is credible.
50. There is criticism that the Council did not sufficiently consult developers in the preparation of its Strategic Housing Land Availability Assessment (SHLAA). The evidence, however, is that the views of key stakeholders were taken into account. Any shortcomings are not so crucial that they invalidate the findings of that Assessment, updated as recently as March 2011. It examines sites of 0.4 ha or more from a variety of sources and is thorough and comprehensive. It shows that there is a deliverable supply for 9,333 dwellings in the Borough (4,806 in the DMUA) for the first 5 years of the plan period, a developable supply for 20,200 (6,614 in the DMUA) during years 6-10 and a developable supply for 16,692 (5,370 in the DMUA) during the remainder of the plan period.

51. There is thus a deliverable/developable supply for 46,225 dwellings in the Borough as a whole, of which 16,790 are in the DMUA. The 9,333 compares with a total 5 year requirement of $5 \times 1230 = 6150$ whilst the 46,225 compares with the total Core Strategy of $15 \times 1230 = 18,450$. The additional 2 years of the plan period increases this to 20,910. Of this potential of 46,225, 43,810 is on urban and urban extension sites associated with the proposed locations for growth, the DMUA, Principal Towns, Potential Growth Towns and renewal Towns. This is more than twice the Core Strategy requirement of 18,450 or even of 20,910. Windfalls at an annual average of 200 dwellings are likely to be an additional source of supply.
52. These figures should, however, be treated with a good deal of caution. The SHLAA is important evidence, but it does not in itself determine whether a site should be allocated for residential development. It therefore assists in making decisions on possible allocations alongside appraisals of site-specific sustainability factors. In identifying constraints, however, it can be useful in indicating measures for overcoming those constraints. In these respects, therefore, it is no more than a preliminary step along the road to the Site Allocations DPD. Various participants draw attention to a range of constraints applying to a variety of sites, and no doubt a number of these will be confirmed as the Council deliberates on reasonable alternative sites as it prepares its Sites Allocations Plan. The Conservation Towns and the Villages may not, for policy reasons, accommodate more than a few hundred or so dwellings, whereas the SHLAA identifies land in them for 2,415 dwellings. The assumed net density of 38 dwellings per hectare, unless available information indicates otherwise, may not always be achievable. In the current economic climate, the assumed build-out rates and lead-in times may not always be achieved.
53. Despite these important reservations, the prevailing conclusion from the SHLAA is that there is likely to be enough land, in the right places and at the right times, to provide for the Borough's foreseeable needs. Moreover, the SHLAA rightly takes no account of windfalls, sites of less than 0.4 ha and any net increase as a result of housing renewal programmes in the Pathfinder area and elsewhere and the bringing back into use dwellings which have been unoccupied for a considerable period. Nor does it include most sites with planning permissions on 1 April 2010, although most of the planning permissions capacity is on sites assessed through the SHLAA. The total additional capacity of sites with planning permission (excluding those large sites which have been subject to detailed SHLAA analysis) is 2,249 dwellings. Drawing on information from the SHLAA, the Council can identify sufficient specific deliverable sites to deliver housing in the first 5 years of the plan period. It can also identify a further supply of specific, developable sites for years 6-10 and, indeed, for the remainder of the plan period. This is a good foundation for the Site Allocations DPD.

Phasing

54. At Table P10 in the PHV, the Core Strategy includes a phasing programme, although no phasing is proposed for housing renewal sites or sites with planning permission, unless phasing is part of the permission. This is reasonable. Phase 1, from 2011 onwards, applies to existing housing and

mixed use allocations (except where flood risk or other delivery issues cannot be resolved) and to new urban allocations in the settlements concerned (except where unlikely to be delivered in this Phase, in which case they would be assigned to Phases 2 and 3).

55. Phase 2, from 2016 onwards, would apply to the new urban extension allocations to the DMUA and Principal Towns that are identified as the most sustainable and deliverable alternatives necessary to meet the Phase 2 requirement, and to new urban extension allocations to the Potential Growth Towns (but only in accordance with Policy 2 and so could be in Phases 1 or 3). Phase 3, from 2021 onwards, would apply to other urban extensions to the DMUA, to the Principal Towns necessary to meet the Phase 3 requirement and to new urban extension allocations to the Renewal Towns (provided suitable sites can be identified).
56. This is a far from straightforward phasing strategy but, bearing in mind such considerations as economic uncertainties and the often reliance upon infrastructure and its timing, it is as reasonably clear and certain as it can be. Appendix 5 in the PHV is a useful addition to the Submission Version. It sets out an indicative housing allocation for each of the 3 phases although, owing to conclusions about different levels of growth in the examination of Issue 1, the assumption of 780 new dwellings in each of the 6 Principal Towns is a doubtful one. The PHV should serve to ensure a reasonable balance of development in each phase between greenfield and other sites where various constraints apply. It thus combines firmness with choice and flexibility.

Previously-developed land, windfalls and empty homes

57. Core Strategy Policy 10 prioritises the re-use of well-located previously-developed land in line with national policy in PPS 3 paragraph 40 which urges local planning authorities to continue to make effective use of land by re-using this resource. It is estimated that it will provide about 50% of the Borough's housing requirement during the plan period. Policy 11 supports housing renewal programmes and the redevelopment of surplus employment sites and commits to bringing forward major previously-developed land in its ownership in accordance with PPS 3 paragraph 36.
58. In August 2011 there were 4,565 empty dwellings in the Borough of which 2327 had been empty for more than 6 months. Probably about 3% of the housing stock (about 3,700 dwellings) is vacant at any one time. The Council has allocated £500,00 to bring empty dwellings back into homes, regarding those that had been empty for more than 6 months as windfalls. This type of regeneration should result in a small, but valuable, addition to the housing stock. It accords with wider policies of regeneration and urban renaissance and should be strongly supported.

Housing mix

59. Core Strategy Policy 12 promotes a mix of house size, type, price and tenure as a way of accommodating needs and demands and to support mixed communities. It accords with national policy which seeks to achieve a wide choice of high quality homes, both affordable and market, to address the requirements of the community. The Policy, carried forward to the Site

Allocations DPD, will no doubt continue to be informed by the Strategic Housing Market Assessment (SHMA) which the Council is likely to review at least twice during the plan period. Inevitably, larger sites will provide better opportunities for the intended mix, but there is no reason to doubt that residential schemes will provide for the needs of the whole community. Particular sites can be assessed as proposals for them are considered, in the light of circumstances at the time, and the Core Strategy provides the policy context for doing so.

Conclusion

60. Estimating the supply of land for housing is no easy task, especially in the current economic climate. Despite the inevitable uncertainties and age of some of the evidence base, the Core Strategy is effective in meeting local housing needs, including the provision of an appropriate mix of housing of suitable quality and at suitable densities. In these respects, it is sound.

Issue 3 – Whether the Core Strategy is effective in meeting special housing needs, including for affordable homes and for gypsies and travellers

Affordable Housing

61. Policy 12 seeks to ensure that proposals for 15 or more dwellings on housing sites will normally include an element of affordable homes. This accords with national policy in PPS 3 and there is no reason to depart from it. The Council estimates that 26% of all new dwellings should be affordable with a 74%/26% split between social rented (to include affordable rented) and intermediate housing. On the face of it, these provisions appear to be reasonable, being based upon the Local Needs Assessment (LNA) 2007 and the RSS requirement of "up to 30%".
62. It is correctly pointed out that the annual need for 224 affordable dwellings estimated in the LNA, equates to 18.2%, not 26%, of the annual housing requirement of 1230 dwellings. But the Policy should be applied in the context of a generally increasing need for affordable homes, from this 224 to the 876 annually (71.2% of the annual requirement) during the next 10 years as estimated in the Doncaster Housing Strategy 2011-2014, and more according to any increase in population. Past performance does not instil confidence, with 30 affordable homes provided in 2005/06, 96 in 2006/07, 50 in 2007/08, 121 in 2008/09 and 48 in 2009/10, an annual average of only 69, well below the target of 224. The Council is well aware of the urgent need for affordable homes and will no doubt secure as many as possible on qualifying residential schemes. Bearing in mind the length of the plan period, the Council's strategy for growth and the expectation of a more favourable economic climate at some time in the future, there is still a reasonable chance of meeting this target.
63. Circumstances will vary from site to site and so the target and percentages should be treated with a good deal of caution. In effect, they can be no more than a basis for negotiation and hopefully agreement on any necessary viability assessment. Targets, whilst being a reflection of long term need, may be increasingly less important than matters of viability which could

include measures of mitigation with regard to flood risk and contamination, acceptable profit margins and the amount of finance available. These are all crucially important material considerations in the current economic climate, and are likely to vary from place to place across a Borough as large and varied as this one. But it is noteworthy that the Council appears to have secured an affordable housing provision of 26% of the 750 dwellings recently permitted at Finningley (Application No 09/02048/OUTM). This demonstrates that, at least on large schemes, there is a realistic prospect of achieving this level of provision and makes the important point that the Council is pro-active in seeking to meet affordable housing needs.

64. The Policy is suitably flexible in several ways, thereby anticipating the monitoring of progress and reviewing the requirements. For example, it refers to a future and latest SHMA, viability and an alternative scheme which, where justified, could mean fewer than 26% affordable homes. It does not insist on on-site provision. Even if the target and percentage is not met during the next few years, the Policy does at least provide a useful measure in giving the Council a realistic prospect of securing as many affordable homes for local people as the particular circumstances allow. It gives developers as much certainty as can be provided in present conditions, changing economic times and a changing housing market. Applied circumspectly, the Policy need not thwart the provision of affordable homes. It should, in fact, assist the Council in meeting as much of this urgent need as possible. In these circumstances, and bearing in mind the conclusions of the Affordable Housing: Proposed Interim Planning Position Statement-Implications and Impact Report (Document H7), viability considerations should not undermine the objectives of the Policy.

Gypsies and Travellers

65. It is the Government's policy to create sustainable, inclusive, mixed communities in all areas, both rural and urban. That is the context for examining the Council's planning provisions for gypsies and travellers.
66. The Council had considered that the 2006-2011 unmet need for sites had been met as a result of permissions and the authorisation of sites which did not have the benefit of planning permission. At a recent appeal, however, the Inspector concluded that the unmet need was 51 pitches, reduced to 41 as a result of the appeal decision. The Council does not challenge this figure. It is, however, preparing a new Travellers Needs Assessment which will deal with any remaining unmet need up to 2011 and any estimated additional need arising from 2011 onwards. In the meantime, the rigorous criteria-based Policy 13 is the best way forward. In particular, it notes the very special circumstances that must apply where any proposals in the Green Belt are made.
67. There is no need for Policy 13, or any other Core Strategy policy, to include a criterion along the lines of there being *no conflict with other development plan policies*. There is no reason to doubt that, in its determination of planning applications, the Council will continue to have regard to its development plan and all material considerations, as Section 54A of the principal Act requires, according due weight to each relevant policy as it does so.

Other Needs

68. These include any need for general and specialist sheltered accommodation, especially for an ageing population, and for students including those who attend Doncaster College. Policy 12 seeks to provide for them, setting out reasonable criteria.

Conclusion

69. The Core Strategy is effective in meeting special housing needs, including for affordable homes and for gypsies and travellers. In these respects it is sound.

Issue 4 – Whether the Core Strategy convincingly sets out the role of Doncaster Town Centre, suitably protecting and enhancing its vitality and viability without serious detriment to other town centres in and beyond the Borough

General approach and Doncaster Town Centre

70. The Core Strategy affirms that Doncaster town centre will remain the largest centre in the Borough and acknowledges the requirement of national policy that the vitality and viability of existing centres should be sustained and enhanced. This approach accords with RSS Policy SY1 which states that it should be a vibrant, healthy, accessible, attractive and safe place where more people live, visit and work. It also accords with RSS Policy YH4 which states that it should be the prime focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region.
71. A hierarchy of retail centres develops this objective, including the definition of Doncaster as a sub-regional centre. The hierarchy is based upon the existing function, character, attractiveness and economic conditions within the Borough's retail centres. There is no conflict with the settlement hierarchy which, as explained in the supporting text to Policy 2, has the broader aim of distributing growth and regeneration in the future where it would do most good in terms of supporting prosperous and sustainable communities. The 2 hierarchies complement each other.
72. The Core Strategy proposes major development and regeneration at and near the town centre at the Waterfront, Marshgate, the Civic and Cultural Quarter (CCQ) and St Sepulchre Gate West. The other Town Centres, the District Centres, Local Centres and Neighbourhood Shopping Parades are defined in accordance with their descending offer, as examined in the Doncaster Retail Hierarchy Study 2009. Rightly, however, the hierarchy is flexible, and the Core Strategy does not preclude the possibility of additional District Centres being identified in future plans, in line with substantial development proposals. That might include land at Wheatley Hall Road.
73. The Doncaster Retail Study 2010 is a thorough, comprehensive and convincing assessment of the Borough's retail requirements up to 2026. Although it advises that there is no immediate need for significant retail expansion, it estimates that there will be capacity for an additional 12,308 sq m of convenience, and for an additional 46,532 sq m of comparison, goods

floorspace in the Borough during the plan period. The proposed extension of the plan period up to 2028 suggests proportionate further additions, but recent approvals for superstores implies significantly less capacity than previously estimated.

74. Estimates of capacity, especially during the number of years of a plan period, inevitably depend upon the robustness of the assumptions which underpin them. These assumptions include those of population and household growth, employment levels, income and expenditure, any changes to catchment areas and the general level of economic activity. Rightly, the Council proposes to update the Retail Study to inform its Sites Allocations DPD and regular monitoring will be required. Even so, the Study provides a robust and useful evidence base for the Core Strategy and subsequent DPDs. There is no need to change these estimates to accommodate the extended plan period.
75. The town centre and regeneration needs of other settlements in the hierarchy should not be overlooked, particularly at Thorne and Mexborough. But the emphasis should be on focusing the envisaged increase in retail and other town centre uses on Doncaster as the sub-regional centre. This strategy accords with the greater existing and future population of the town and its roles as the hub of public transport services in the Borough and further afield and as the predominant centre for employment, leisure, education and cultural facilities. This is the commendable approach of the Core Strategy.
76. The Retail Study advises that the level of capacity in the Borough does not justify further out-of-centre floorspace and that it demonstrates the ability of existing centres to accommodate additional convenience floorspace and increase their market share. The Borough, it says, has a significant level of out-of-centre comparison goods retailing which is currently trading in line with expectations and does not appear to be having a detrimental impact on the performance of Doncaster town centre. It estimates an additional capacity of 40,397 sq m of comparison goods floorspace by 2025, or about 87% of the Borough total. Provided suitable land is available and other considerations permitting, this indicates the degree to which comparison goods floorspace should be focused on Doncaster town centre. This degree of focus would consolidate the offer of the town centre and assist its potential to achieve a higher proportion of market share.
77. The Study acknowledges the role of special forms of trading, noting that where necessary the survey results have been re-based to remove certain responses such as internet and mail order shopping. Owing to its convenience, often with home deliveries, this type of trading may increase in importance with potential detriment to town centres. Any significant increase in out-of-centre retailing, often with easy access and parking, may pose a further threat to town centres in the Borough. Other competition is from the Meadowhall Centre and Sheffield City Centre. In these circumstances, the Borough's town centres and in particular Doncaster town centre, must strive to be more than shopping centres.
78. The Core Strategy makes the telling points that a town centre should offer an exciting and fulfilling experience, with shops, cafes, bars and other meeting places, and in a safe and attractive environment, easily accessible especially

by public transport but also with adequate short stay parking provision in accordance with the Sheffield City Region Transport Strategy. Throughout history, at home and abroad, town centres have been the places where people come together, to mingle, hold markets, exchange ideas, learn, live, eat, drink and generally seek to enhance the human condition. The Council is well aware of the potential threats to, and opportunities in, its town centres. Actions in Doncaster town centre have included pedestrian priority schemes, tree planting, provision of tasteful street furniture, the control of advertisements, the designation and appraisal of Conservation Areas and as a whole, it would appear, policies which have led to its present vibrancy. More regeneration, as the Core Strategy proposes, should take these measures and objectives yet further.

Mexborough and Thorne

79. The RSS defines Mexborough and Thorne as Principal Towns and it is reasonable to expect some additional retail development in accordance with this status. The Retail Study notes that Mexborough town centre has the ability to support additional convenience floorspace through the clawback of expenditure and an overall increase in market share. At Thorne it identifies a convenience goods capacity for 787 sq m by 2025, based upon current market share but excluding new commitments. For both towns, the Core Strategy notes their importance as service centres for local catchments and rightly proposes thriving centres for them.

Conclusion

80. Core Strategy Policies 7 and 8 and their supporting text, supplemented by an updated Retail Study, provide the overall vision for retail, employment and town centre development in the Borough. By setting out a hierarchy of centres and the town centre first approach, the Core Strategy explains where these types of development should go in broad terms. In particular, it convincingly sets out the role of Doncaster Town Centre, suitably protecting and enhancing its vitality and viability. It also acknowledges the importance of Thorne and Mexborough. There is no evidence to suggest that this strategy would cause serious detriment to other town centres in and beyond the Borough. In these respects, the Core Strategy is justified, effective and consistent with national policy and therefore sound.

Issue 5 – Whether the Core Strategy provides sufficient protection, preservation and enhancement of the built and natural environment and introduces measures of sufficient force to mitigate any potential adverse effects upon these interests

The Built Environment

81. Doncaster has an attractive and interesting townscape quality which results from its long and varied history as a fortified crossing point, Danum, over the River Don on the important Roman road between London and York. Since Norman times it has continued to evolve as a busy market town. The stagecoach era led to the growth in horse breeding, then horse racing, hence its present fame for the St Leger Stakes, first held in the 1770s. Much of the

town centre displays a distinctive Georgian elegance, and this provides a firm foundation for an attractive, inviting local environment.

82. From about the late 1770s, Doncaster grew as an industrial town with the construction of railways and canals and became an important centre for locomotive and carriage works. As the Core Strategy states, it was the birthplace of the Mallard and the Flying Scotsman. During the early 1900s, it became an important centre for coal mining, and this led to further urbanisation of the town and the development of a dispersed settlement pattern throughout much of the present Borough. Historically, this pattern essentially comprises the dominance of Doncaster and its environs, a number of market towns including Thorne, Hatfield, Bawtry and Tickhill and smaller settlements whose origins and/or growth have resulted from agriculture and/or mining.
83. The Core Strategy describes the development of the Borough throughout the centuries in a succinct and useful way. This serves to explain its heritage assets, defined in PPS 5 as those parts of the historic environment which have significance because of their heritage, archaeological, architectural or artistic interest. It also helps to explain the size, type and distribution of settlements in the Borough, and thence the opportunities, problems and challenges which stem from these considerations. As a result of its diverse history, the Borough has an enviable wealth of heritage assets.
84. In Doncaster these assets include the Palladian style Mansion House, opened in April 1749, with its impressive ballroom, furniture and fittings, providing an elegant setting for one of the Hearings, and Sir George Gilbert Scott's St George's Minster of 1858, imposing at all times and especially so when floodlit at night. The town's Georgian heritage is clear to see in some of its 9 Conservation Areas. Of the other 37 Conservation Areas listed in the document of that name, those visited include Conisbrough, dominated by its Listed Castle, dating from the late 12th century and with one of the finest circular Norman keep towers in the country, and Hatfield where St Lawrence's Church, dating from about 1150 and with its Norman origins still much in evidence, provides a very visible and inspiring presence. Many of the traditional buildings off the High Street are of hand made brick with clay pantile roofs. There are as many as 789 Listed Buildings in the Borough of which 61 are Grade 1 or II*. There are 4 Registered Parks and Gardens of which 2 (Cusworth Hall Park and the Dell, Hexthorpe) are owned by the Council, and 51 Scheduled Monuments.
85. The aptly named Policy 15: Valuing Our Historic Environment seeks to support proposals and initiatives which preserve and, where appropriate, enhance this impressive heritage significance and setting of the Borough's heritage assets, especially those elements which contribute to the distinct identity of the Borough. Rightly, the Policy draws attention to the need to protect key views and vistas, including the spires and towers of historic churches of which the Minster (Grade I) and Christ Church Doncaster Grade II*, are good examples. These assets should be protected for their own sakes but, as the Core Strategy says, they contribute to local character and sense of place. By accentuating interest and the distinctiveness of the Borough, they make its

various places more attractive to visit and in which to live, work and invest. There are thus economic as well as educational and cultural benefits.

86. The Policy accords with the Government's overarching aim set out in PPS 5 and the draft NPPF that the historic environment should be conserved and enjoyed for the quality of life which it brings to this and future generations. Aims and policies are, however, of little account on their own. There can be no doubt, however, about the Council's commitment to heritage. It is set out in Matter 6 Appendix 2. Of particular note is the Conservation Area Partnership Scheme 1997-2002 whereby 88 town centre premises were improved as a result of £500,000 grant assistance from various sources, including the Council. It has more recently invested in the restoration of the Grade II Wool Market, and this should serve to keep Doncaster Market as the best, or one of the best, in the country.
87. Similar schemes have taken place in Thorne and Conisbrough Conservation Areas. The Council is working in partnership with English Heritage to bid for lottery funding for a new visitors' centre at Conisbrough Castle. Council funding has contributed to restoration at Cusworth Hall and Park, and the Appendix notes further intervention to safeguard Christ Church, Doncaster, the Arksey Almshouses and Hyde Park Cemetery. It is represented on the South Yorkshire Buildings Preservation Trust and the elected Mayor made an election manifesto commitment to protect the historic environment of the Borough. It continues to work with other bodies in these respects. Assets of significance which are at risk are identified, and there is no doubt that the Council will do all it can, at a time when resources are limited, to safeguard their future.
88. In certain circumstances, enabling development may be justified to preserve or enhance a heritage asset, and the policies do not preclude that approach. The positive flavour of the policies allows, where appropriate, the suitable re-occupation, re-use and restoration of historic buildings. It accords with Objective 9 of making the most of existing buildings. Significantly, English Heritage and the South Yorkshire Archaeological Service support the Core Strategy.

The Natural Environment

89. The Core Strategy includes several specific policies which seek to protect and enhance elements of, and the entirety of, the natural environment. Policy 3 applies to the countryside and the Green Belt, Policy 16 applies to the natural environment and Policy 17 which has the same aim for green infrastructure which, where possible, will be extended. There is a significant amount of good quality agricultural land in the Borough, and Policy 18 seeks to support proposals which facilitate the efficient use of its agricultural land and soil resources.
90. The aims of these policies have not attracted much comment. They accord with national policy in PPG 2 for the protection of the Green Belt and with PPS 7 and especially its continued protection of the open countryside for the benefit of all, with the highest level of protection given to the most valued landscapes and environmental resources. They accord with similar objectives in the draft NPPF.

Mitigation Measures

91. Some developments may have potentially harmful effects, and it is reasonable to suppose that measures of mitigation would be brought to bear. Policies 17 and 18, for example, refer to potential impact, mitigation and appropriate compensation measures. This is helpful, but these measures would normally be by way of conditions attached to planning permissions and/or legal agreements as part of the usual development control and management regime. There is no reason to conclude that the Council will not continue to attach conditions and seek agreements relevant to the development to be permitted and in furtherance of development plan policies.

Conclusion

92. The Council shows a clear commitment to protect, preserve and enhance the built environment, especially its historic assets, and the key elements of the natural environment. These policies are justified by the evidence base, are effective and comply with national policy. Moreover, the Council's good track record instils confidence. In these respects, the Core Strategy is sound.

Issue 6 – Whether the Core Strategy's approach to economic development and the protection of employment land clearly articulated, sufficiently justified and in line with national policy

Land requirements

93. National policy in PPS 4 Policy EC1.2 b) & d) requires local planning authorities to assess, in broad terms, the overall need for land or floorspace for economic development including main town centre uses during the plan period. They should also identify locations of deprivation to prioritise for remedial action and to address the drivers of decline in those areas. The Council has therefore prepared an Employment Land Review (ELR) (December 2009) and its Update Note (2011). The amount of land required throughout the plan period has been quantified on the basis of forecast modelling and past take-up rates. Future needs have also been examined in the Local Economic Assessment (LEA).
94. The estimated net land requirements are set out in Table 2 in the Submission Version and Table P2.2 in the PHV. Briefly, 140,000 sq m of additional office floorspace are proposed predominantly in Doncaster town centre, another 290 ha of distribution warehousing is proposed, 34 ha of existing land at RHADS plus an additional 10 ha to the west of the Airport and another 190 ha of land for light industry. These assessments are thorough, comprehensive and convincing, and give a good indication of the likely needs of the Borough during the plan period. Bearing in mind the extended plan period from 2026 to 2028 in the PHV, these figures should be regarded as minimum requirements and the Council may wish to make this clear by way of an additional modification to the Core Strategy. Nevertheless, the figures should be regularly reviewed every 3 years or so through the ELR updating process.
95. The allocation of this land, together with projects which are being planned in the Borough, implies the potential for the creation of 36,000 jobs during the plan period. Ideally, this figure should be completely in balance with

population and housing growth, but factors such as the general economic climate during the plan period, the way it affects house building and the take up of employment land and levels of commuting into and from the Borough will play their part. Other assumptions include future employment rates, occupancy rates and working and retirement ages during the next 16-17 years, and all in the context of the present fragile economic climate. These assumptions can be debated at length, but there is no evidence so convincing that it calls for any significant change to the Council's estimated growth in jobs or in its proposed employment land requirements.

Assessment of sites and broad locations

96. The draft NPPF states that planning policies should avoid the long term protection of employment land, and all existing employment sites have been assessed for their continued suitability for this use. Criteria include their location compared to deprived communities as rated by the Government's Indices of Multiple Deprivation. Housing is not expected to be permitted on any land allocated for employment in subsequent DPDs, but the Core Strategy does not preclude in principle the residential development of land allocated for employment. Policy 5 is firm, but sufficiently flexible to allow for certain uses in certain circumstances on land allocated for employment uses.
97. One of the Borough's key advantages is its location within and close to the Motorway network. These roads are the A1(M), the M18, M180 and, to the north, the M62. These north-south and east-west routes make the Borough an ideal place for large, strategic warehousing sites, as already can be clearly seen at Junction 4 (Westmoor Park) and Junction 6 (Nimbus Park). It is an expanding sector of the local economy, and the Core Strategy rightly gives prominence to the need to promote this type of development to create jobs and the prosperity which they foster. The Core Strategy, based on a robust evidence base which includes employment densities, demand, forecasting and previous take-up rates, sets out likely requirements and this will be a useful basis for the allocation of land for this purpose in the Allocations DPD. In particular, the Council's approach accords with national policy in PPS 4 especially its support for existing business sectors, the reflection of different locational requirements of businesses and the promotion of key distribution networks. More detailed work will have to be undertaken to assess the suitability of particular sites to which reference is made in both the Core Strategy and the representations, including Bentley Moor Lane and Bradholme Farm.
98. Table P2.2 in the PHV indicates broad locations for employment uses. In particular, land for distribution warehousing is expected to be allocated along the M18/M180 corridor at junctions close to Armthorpe, Stainforth, Hatfield and/or Thorne and at the Strategic Rail Freight Interchange (SRFI) at Rossington. The identification of these broad locations and sites makes best sense. They are broadly in an east-west corridor between the industrial areas of South Yorkshire and the Humber ports, and with good access to and from the A1(M) which itself is not devoid of existing strategic warehousing sites, as at the Redhouse interchange (A1(M)/A638 junction). The Core Strategy seeks to give a general priority to the recycling of previously-developed land, but that is not the only criterion. The exacting requirements of the logistics

industry means the inevitability of allocating greenfield land, at present within the Countryside Protection Policy Area, lying close to the motorways.

The SRFI at Rossington

99. Outline planning permission for the SRFI was granted in November 2009 subject to a Section 106 Agreement which was signed in August 2011. It will include road and rail served distribution units, a link road to Junction 3 of the M18 (the Finningley and Rossington Regeneration Route Scheme Stage 1) (FARRRS) and rail access from the South Yorkshire Joint Line. This is an exciting proposal of considerable scale and a mainstay of the sustainability aims of the Core Strategy. It will assist in the delivery of FARRRS and accords with national policy in PPG 13 which states that while road transport is likely to remain the main mode for many freight movements, land use planning can help to promote sustainable distribution including, where feasible, the movement of freight by rail and water. Where appropriate, infrastructure such as major freight interchanges should be developed which include facilities allowing road to rail transfer. It also accords with the spirit of PPG 13 objective of protecting sites and routes which could be critical in developing infrastructure to widen transport choices for both passenger and freight movement.
100. Part of the general approach to delivering sustainable development, as set out in PPS 1, is to bring forward sufficient land of a suitable quality in appropriate locations to meet expected needs for industrial, commercial and other development, taking account issues such as accessibility and sustainable transport needs. The promotion of the SRFI accords with that policy. Moreover, the Chancellor's Autumn Statement 2011 Annex A.35 notes that the Government has published a Written Ministerial Statement to support the development of, and investment in, SRFIs. The Statement is supported by a detailed SRFI guidance document. And the draft NPPF promotes the use of sustainable modes of transport.
101. Negotiations with prospective tenants are taking place, and the first occupiers are expected to be in the first units in September 2013. The first unit available is likely to be of 1,000,000 sq ft floorspace, and Phase One is expected to include 3,000,000 sq ft floorspace. Everything reasonable should be undertaken to ensure the success of this vital proposal, especially in view of the very substantial initial and total costs involved and its significance as part of the national rail logistics network, and hence with links to Harwich and Felixstowe, amongst the UK's leading container ports. It should not be thwarted or subjected to avoidable uncertainty as a result of the allocation and release of a substantial amount of other land for strategic warehousing or, indeed, the availability of existing commitments.
102. Consultation on my suggested addition to Policy 5 and its supporting text and the Council's amendments thereto has resulted in a considerable amount of resistance to any such changes. There is no evidence of such phasing in the case of any other proposed SRFI in the country, but that is by no means the only consideration. A judicious element of phasing, a not unusual device in a development plan, would not necessarily unduly restrict competition and choice in the selection of sites for development. Any alleged unfair

competition and the potential benefits of sites held back for 5 years would be outweighed by the sustainability credentials of the SRFI and hence the public interest. Protection during the entire plan period, or during a substantial part of it, would indeed unreasonably restrict competition. If it were to be for only a few years, it is doubtful whether, given the initial large financial outlay of providing for road and rail transport and potential occupiers' choice of accommodation, there would be enough confidence instilled to progress the SRFI. The 5 years and 50% set out in the Main Modification below is a reasonable compromise between the competing objectives of choice of strategic location and the protection and promotion of a sustainable form of freight transport.

103. This protection, lasting no more than one third of the plan period, would give the SRFI, as part of a key distribution network likely to generate substantial transport movements, a fair opportunity to gain critical mass to ensure significant modal shift. Although not all occupiers need or want sites with rail connections, this short term protection would give the developer the confidence to fund FARRRS and contribute to the Council's regeneration objectives and the ambitions of the Sheffield City Region. It would accord with the Government's objectives for the planning system, particularly the guiding principle that good planning is a positive and proactive process, operating in the public interest through a system of plan preparation and control over the use and development of land. This is a case where a private interest coincides with the public interest.
104. In order to ensure that sufficient priority is given to this proposal and in view of the importance of the SRFI in the promotion of the increasing use of rail transport, Policy 5 should include the following provision as a Main Modification as set out below and in the Appendix (MM2):

In releasing new land for strategic warehousing, priority will be given to the proposed Strategic Rail Freight Interchange at Rossington which will be served by rail freight and will operate as an intermodal terminal.

105. To the supporting text to the Policy should be added the following. This also is a Main Modification and it, too, is set out in the Appendix (MM3).

Policy 2: Growth and Regeneration Strategy, indicates that an additional 290 hectares (net) of additional distribution warehousing will be allocated, with the broad locations being the M18/M180 corridor at junctions close to Armthorpe, Stainforth/Hatfield and/or Thorne and the Strategic Rail Freight Interchange at Rossington. Policy 5 gives priority to sites at the Strategic Rail Freight Interchange at Rossington which it is envisaged will provide approximately 166 hectares of land for distribution warehousing. The Council will therefore phase the release of the remaining 124 hectares of land and ensure that a maximum of only 50% (62 hectares) will be developed within 5 years of the date of adoption of the Core Strategy. This figure includes those sites with planning permission.

Other matters

106. Other employment sites, of appropriate scale, could be allocated to various settlements in accordance with the settlement hierarchy. The Core Strategy thereby gives an indication of where developments should go in broad terms. There is no specific policy concerning tourism, but policies concerning heritage assets, the countryside, leisure, town centres and the natural environment are relevant. Nor is there a specific policy or floorspace allowance for home working, and this might mean a small over-provision of employment land. In view of the extended plan period of the PHV, this is of little if any significance.
107. The Council is aware of the need to increase the range of skills of local people to better equip them for the jobs resulting from its employment policies. Commendably, it works closely with employers and the education and training bodies to that end, being represented for example on Enterprising Doncaster and Directions Finningley (RHADS). Of significance is the enthusiastic support of the Core Strategy by the Doncaster Chamber of Commerce. The Council's commitment to training and skills should assist in providing local people with good opportunities to benefit from the variety of employment prospects which the Core Strategy fosters.

Conclusion

108. The Core Strategy's approach to economic development, the protection of employment land and related matters is clearly articulated, sufficiently justified and in line with national policy. It is sound in these respects.

Matter 7 – Whether the Core Strategy adequately sets out, as far as geology allows, where, when and by which means adequate supplies of aggregate minerals can be safeguarded, explored and extracted

Sand and gravel

109. The sub-regional apportionment for the 15 year period is the annual apportionment from the RSS multiplied by 17 to accord it with the PHV plan period. This is 13.77 million tonnes (mt) (0.81 x 17). Reserves are estimated to be 7.61 mt, leaving an additional requirement of 6.16 mt. The Council estimates a realistic additional supply of one mt up to 2028. The Core Strategy candidly accepts that it is unlikely that the sub-regional apportionment will be met throughout the plan period, but sets out the Council's intention to meet it as far as is practicable. It is not proposing any reduction in the apportionment, but Table 2 identifies what can realistically be achieved based upon evidence which includes representations from the minerals operators. Thus Policy 20 A) 2 seeks, where possible, to maintain a land bank of permitted reserves for at least 7 years for sand and gravel. The Core Strategy does not prevent the exploitation of other as yet unidentified deposits, if found to be economically workable and in accordance with the stated criteria.
110. The demand for sand and gravel will much depend upon general economic activity. Minerals Planning Statement 1 Annex 1 states that sub-regional apportionments should not be regarded as inflexible. This national policy, the convincing evidence from operators about reserves and intentions, the

conclusions in the Assessments concerning the limited amount of reserves, especially of sharp sand suitable for use in concrete and the availability of sources beyond the Borough, ensures that this shortfall is not fatal to the soundness of the Core Strategy. The emphasis in the Policy on recycling, the economies of doing so and the more efficient use of finite resources, coupled with the aims of the Barnsley, Doncaster and Rotherham Joint Waste Plan for the re-use, recycling and recovery of materials' strengthens that conclusion.

Other minerals and safeguarding areas

111. The Borough is rich in other minerals, particularly economically important deposits of shallow coal, aggregate, industrial and building (including historic) limestone within the Magnesian Limestone ridge between Barnsdale Bar in the north and Stainton in the south. The Core Strategy proposes to safeguard them, as well as the economically important deposits of sharp sand and gravel between Fishlake and Bawtry, during and beyond the plan period by defining "mineral safeguarding areas". These areas will be used as a basis for defining site allocations in subsequent DPDs.
112. The Core Strategy does not define any preferred areas to which aggregate mineral exploration and extraction should be directed. This approach does not conflict with national policy in MPS 1 which sets no requirement to do so, stating that provision should take the form of specific sites, preferred areas and/or areas of search identified in LDDs. The Council does not, however, intend to identify preferred areas in subsequent DPDs for non-aggregate minerals. Policy 20 provides for the allocation of sites for industrial limestone (an extension to Warmsworth Quarry) and spoil disposal at Hatfield Colliery. Again, site allocations will be set out in subsequent DPDs.
113. Proposals for unconventional gas exploitation will be supported in particular circumstances.

Conclusion

114. Policy 20 and its supporting text as set out in the PHV, when read in conjunction with other Core Strategy policies, suitably sets out the key considerations for the various types of minerals for both the allocation of sites by way of its identification of broad locations and for the determination of planning applications. The Policy is a useful basis for the more detailed work already taking place in the preparation of a subsequent DPD. In these respects, the Core Strategy is sound.

Matter 8 – Whether the Core Strategy provides satisfactorily for the delivery of development, particularly its required infrastructure, and convincingly demonstrate adequate monitoring of its provision and measures designed to rectify any shortcomings

Introduction

115. The economic context for the Core Strategy is one of considerable uncertainty. There must, therefore, be an element of doubt about public and private investment and this is not a sure foundation for devising policies and proposals for the use and development of land during the next 16-17 years.

At the time of writing, the Council has not decided whether to implement the Community Infrastructure Levy (CIL), and so the relationship between CIL and Section 106 Agreements with respect to the provision of necessary and relevant infrastructure is not clear. Despite these uncertainties, the Council has consulted widely on the means of delivery. The Highways Agency, for example, confirms that it and the Council consistently work together. In this and other ways the Council has been as pragmatic as possible in the preparation of the Core Strategy.

The Infrastructure Delivery Plan (IDP)

116. This Plan identifies the main infrastructure required to deliver the strategy. Rightly, it sets out the item, its provider and where and when it is expected to be in place. It deals with a full range of physical, social and environmental infrastructure, and the more important ones feature in the Infrastructure Delivery Schedule (IDS) in the Core Strategy. This distinction results in a suitable balance between detail, conciseness and importance in the delivery of a sustainable strategy. Both are present snapshots and will require regular monitoring and adjustment if need be. The Council is well aware of this, and there is no reason to doubt that Annual Monitoring Reports (AMR) will continue to be produced and remedial action taken as need be and as circumstances allow. The infrastructure planning process in the Core Strategy identifies as far as possible the infrastructure needs and costs, the phasing of development, funding sources and the responsibilities for delivery.

White Rose Way (WRW) and the Finningley and Rossington Regeneration Route Scheme (FARRRS)

117. These 2 schemes are of critical importance to the strategy. The latter depends upon the former because both connect to the M18 Junction 3. Work on the WRW started in June 2010 and is on track to be completed by November 2013 at a cost of £27m. It is needed to relieve congestion which causes queuing onto the M18 at peak times and to ensure that there will be capacity at Junction 3 to accommodate the expected traffic on FARRRS. Funding for the WRW is set out in the Council's Responses to Initial Questions on the Core Strategy (9 September 2011). This explains the committed funding of £12.8m for its Phase 1, made up of £4.7m from the European Regional Development Fund, £7m from Doncaster Council and £1.1m from the Local Transport Partnership and the funding profile at that time for Phase 2. The uncontested evidence at the Hearings is that the Chancellor's Autumn Statement 2011 confirms the funding, that *the money is there*, construction is taking place and it is confidently expected to be complete by 2013.

118. The main purpose of FARRRS is to enable various major developments to take place which will support economic growth and regeneration and provide easier access to the strategic road network. In particular, it would provide better access to Rossington as a potential Growth Town with the redevelopment of the colliery and the SRFI and facilitate expansion of RHADS with attendant benefits to business and high skills employment. It is a crucial part of the Core Strategy. The total scheme is estimated to cost £57m and the funding profile is set out in the Responses. The Council's funding for it of £3.6m was approved in February 2011. The Regional Growth Fund bid for £18m was

submitted in January 2011 and the conditional offer received in April 2011. It is now a commitment. The remaining £35.5m is confidently expected to be provided by developers, including those concerned with RHADS and the SRFI. Peel Investments (North) Limited confirm its commitment to a contribution up to £12.5m for its part in the required funding, on the understanding that it facilitates the full delivery of the RHADS Masterplan (2030). A finance consortium agreement is due to be completed in early 2012. Construction is due to start in the summer of 2012, and the enthusiasm and commitment shown by participants at the Hearing is further evidence that there is a realistic prospect of its expected completion at or about March 2014. One participant refers to *a huge desire and ability to bring it off*.

119. Few things in life are certain, and any significant delay to the scheme or, however unlikely, its abandonment, should be regarded as the trigger to which PPS 12 paragraph 4.46 refers. The Core Strategy acknowledges at the PHV paragraph 4.21 some of the dire consequences of FARRRS not progressing. It seems that the main risk to FARRRS stems from some uncertainty about the SRFI, hence the need to give this vital scheme some protection from undue competition and thus the Main Modifications (MM1 & MM2) to the Core Strategy. As the Core Strategy explains, the Council will continue to monitor progress and, if need be, adopt a variation of its strategy by bringing forward other land for housing, including perhaps some of its own, maybe at one or more of the Principal Towns and/or adjusting the phasing of FARRRS.

Other Schemes

120. The North Doncaster Chord scheme essentially comprises a new railway viaduct over the East Coast Main Line (ECML) and 3.2 km of new twin track. It will improve the operation of the ECML by the removal of slow moving freight trains and the reduction of freight train mileage and delays to passenger and freight trains. It is a Network Rail proposal, not a Council promoted scheme, but as it will increase the efficiency of the railway system it is rightly regarded as part of the key infrastructure to increase business efficiency. It will cost £56m, be Government funded, should start in December 2012 and be completed by Spring 2014. The Council regards it as having a realistic prospect of being delivered as envisaged, and there is no reason to disagree.
121. Consultations with Northern Power Grid confirm that it is now unlikely that the Borough's electricity supply will be overloaded by 2013. There should be sufficient capacity at existing substations that would service all the broad locations identified for growth for the time being and the near future. No capacity improvements are likely to be required, therefore, until further in the plan period and not until 2015 at the earliest. Many of the other schemes listed in the IDS, such as the Woodfield Link Road, the M18 Junction 5 Link Road and the CCQ, have the benefit of planning permission, the CCQ being under construction.
122. Flooding and the risk thereof is an important constraint in the Borough, and the Environment Agency has invested significantly in reducing it. Surface water drainage also causes problems, and work is being undertaken to deal

with it by way of a Surface Water Management Strategy. There is no convincing evidence to support the need for any additional Motorway Service Area and, in any event, need can be outweighed by other material considerations.

Monitoring and Contingencies

123. Monitoring will be essential if the strategy is to be kept on track. For that reason, the Council's LDF Project Board, comprising key elected members, officers and representatives from the private sector, will continue to meet about 4 times a year to check progress on, for example, the delivery of market and affordable housing and advise on any remedial action. The AMR will be used to keep the Core Strategy under review. There is a good deal of flexibility in the Core Strategy, particularly in the range in the number of dwellings proposed for various places. In these ways, and taking account the conclusions on FARRRS and the implications of any significant delay to it, the Core Strategy accords with national policy in PPS 12 paragraph 4.46 concerning contingencies.

Section 106 Agreements and planning conditions

124. Section 106 Agreements will continue to ensure that infrastructure which meets the 5 tests set out in Circular 05/2005 will be provided. A good example is the outline permission for a scheme including 750 homes on 18.6 ha of land off Hurst Lane adjoining RHADS where, the Committee Report notes, the applicant has proposed (sic) to several significant proposals in relation to the development of the site in the form of planning conditions and a Section 106 Agreement. They include a scheme which provides for a programme of financial contributions towards FARRRS. The clear willingness of the Council to discuss and negotiate with intending developers will continue to be a useful basis in ensuring that the right type and amount of infrastructure is provided at the right time, phased if need be.

Track record

125. During the last 10 years, the Council has been successful in securing funds from various sources and promoting a number of important items of infrastructure. These include the bus/rail interchange in Doncaster, the North Bridge over the River Don, the A638 Quality Bus Corridor and 2 Park and Ride systems. Funds may have been more readily available at these times, but the Council's record and experience in promoting these major schemes augurs well for the future.

Conclusion

126. The Council has kept in close contact with key infrastructure providers and it is significant that none of them has raised any concerns about the Core Strategy. The Environment Agency, National Grid, Yorkshire Water and NHS Doncaster have all indicated that they support the Core Strategy as being sound. A Statement of Common Ground has been signed with the Highways Agency confirming close working arrangements. None of these important stakeholders wished to attend any Hearing, and this can be taken as their satisfaction with the Core Strategy.

127. The Core Strategy provides satisfactorily for the delivery of development, particularly its required infrastructure, and the evidence convincingly demonstrates adequate monitoring of its provision and measures designed to rectify any shortcomings. In these respects, it is sound.

Assessment of Legal Compliance

128. My examination of the compliance of the Core Strategy with the legal requirements is summarised in the table below. I conclude that the Core Strategy meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Core Strategy is identified within the approved LDS October 2010 which sets out an expected adoption date of January 2012. The Core Strategy's content is compliant with the LDS, but the expected adoption date has slipped, probably by 2-3 months or so. This is not, however, fatal to the legal compliance of the plan.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in November 2006 and consultation has been compliant with the requirements therein. The post-submission main modification MM1 concerning the plan period was debated at some length at several Hearings. The consultation on the post-submission Main Modifications concerning the phasing of land for warehousing (MM2 & MM3) have been subject to a consultation period of 6 weeks.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Report (July 2011) sets out why AA is not necessary.
National Policy	The Core Strategy complies with national policy except where indicated and modifications are recommended.
Regional Strategy (RS)	The Core Strategy is in general conformity with the RS.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act and Regulations (as amended)	The Core Strategy complies with the Act and the Regulations.

Overall Conclusion and Recommendation

129. The Plan has 2 deficiencies in relation to soundness for the reasons set out above which mean that I recommend non-adoption of it as submitted, in

accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.

130. The Council has requested that I recommend main modifications to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Doncaster Council Core Strategy 2011-2026 DPD satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in PPS12.

Richard E Hollox

Inspector

This Report is accompanied by the Appendix containing the Main Modifications.

Appendix – Main Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in italics.

The page numbers and paragraph numbering below refer to the submission DPD, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
MM1	Various	Various	The Core Strategy plan period should be 2011-2028 and its title should be "Doncaster Council Core Strategy 2011-2028"
MM2	40	Policy 5	In releasing new land for strategic warehousing, priority will be given to the proposed Strategic Rail Freight Interchange at Rossington which will be served by rail freight and will operate as an intermodal terminal
MM3	42	Additional paragraph	Policy 2: Growth and regeneration Strategy, indicates that an additional 290 hectares (net) of additional distribution warehousing will be allocated, with the broad locations being the M18/M180 corridor at junctions close to Armthorpe, Stainforth/Hatfield and/or Thorne and the Strategic Rail Freight Interchange at Rossington. Policy 5 gives priority to sites at the proposed Strategic Rail Freight Interchange at Rossington which it is envisaged will provide approximately 166 hectares. We will therefore phase the release of the remaining 124 hectares of land and ensure that a maximum of 50% (62 hectares) will be developed within 5 years from the adoption of the Core Strategy. This figure includes those sites with planning permission.