INSPECTOR’S NOTE NO. 4: MATTERS, ISSUES AND QUESTIONS

Introduction

This note sets out the matters, issues and questions that will allow me to decide if the Plan is sound and legally compliant and, if not, how it could be modified to ensure that it is.

I have not yet decided when hearing sessions will be held, or how I will run them. I am not, therefore, setting a deadline for the submission of written statements in response to my questions at the present time but will do so in due course.

Examination hearings

Advice about attending hearing sessions was set out in my Guidance Note published on 24 March. Whilst some of that advice is still relevant, the coronavirus pandemic means that it is unlikely that the hearing sessions will be physical events attended by all participants and observers.

A Written Ministerial Statement published on 13 May set out the Government’s expectations for how the planning system should be operating during the emergency, including through virtual hearings: https://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2020-05-13/HCWS235/

The Planning Inspectorate’s guidance about local plan examinations was updated on 28 May: https://www.gov.uk/guidance/coronavirus-covid-19-planning-inspectorate-guidance

I am continuing to liaise with the Council to decide when to start and how to run the examination hearings in the context of the above. At least six weeks notice will be given of the date of the first hearing session.

Participating at hearing sessions

1 INSP1 https://www.doncaster.gov.uk/services/planning/local-plan-examination#Accordion1-6
Only those who have made representations under regulation 20 (ie in response to the Plan published for consultation in August 2019) seeking to change the Plan have a right to be heard (ie participate at a hearing session). **If you wish to exercise your right to be heard please let the Programme Officer know in writing by midday on Friday 3 July 2020** which matter (or matters) set out in Annex 2 you would like to participate in. You must do this regardless of what you may have indicated in your original representations to the Council. If you do not contact the Programme Officer by that deadline, you may not be able to participate.

I will consider all responses received by the deadline and will allocate those that have a right to be heard a place at one or, where I consider it appropriate, more than one hearing session.

Representors who are not seeking changes to the Plan, including those who have made representations supporting it, do not have a right to participate in the hearings. However, I may invite additional participants if I decide that it would assist me in determining the soundness and legal compliance of the Plan

**Written statements**

As stated above, at least six weeks notice will be given of the date of the first hearing session. At that time, I will set a deadline or deadlines for the submission of written statements in response to my matters, issues and questions.

Any representor may submit a hearing statement or statements to address my issues and questions. However, these should only be in response to questions that relate to their original representations. Statements should set out the key points from their original representation against the relevant questions, and not introduce new arguments or evidence. Statements should be concise and focussed, and in any event must contain no more than 3,000 words for each matter.

Further information about written statements is set out in Annex 1.

**Council’s suggested changes to the Plan and responses to my Preliminary Questions**

The Council submitted a schedule of suggested changes to the Plan, along with a schedule of minor amendments, on 4 March 2020\(^2\).

On 8 April, I published Preliminary Questions (PQs) for the Council to respond to in order to provide clarity and potentially narrow down the focus of the examination\(^3\). On 21 May, I published Further Preliminary Questions (FPQs) about policy 7 relating to Doncaster Sheffield Airport\(^4\). The Council’s responses

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\(^2\) CSD5 and CSD6.

\(^3\) INSP2.

\(^4\) INSP3.
to my PQs and FPQs were published on 4 June⁵; some of these suggest changes to the Plan.

I have taken account of the Council’s suggested changes and its other responses to my PQs and FPQs in framing the questions below and, where appropriate, I refer to them under the relevant issue.

**Coronavirus pandemic**

The Council’s response to my Preliminary Questions includes a statement about the implications of the coronavirus pandemic for the examination of the Plan. It states that there could be short, medium and long term effects on the implementation of the Plan, but that these are difficult if not impossible to predict. The Council wishes the examination to proceed and to adopt the Plan as soon as possible as it considers that this will greatly assist the Borough’s recovery from the pandemic. The Plan will be monitored, and this will inform any need for an early review/update of the Plan.

The Government believes that the planning system has a vital role to play in enabling the delivery of housing and economic growth that will support the UK’s economic recovery. It therefore wants local planning authorities and the Planning Inspectorate to drive the planning process forward and expects everyone involved to engage proactively⁶.

I will take full account of the above in proceeding with the examination and respectfully request all participants to do likewise. None of my questions refer to the coronavirus pandemic, and I am not asking for additional evidence about its potential implications for the implementation of the Plan to be provided by the Council or anyone else. That said, if you consider that there is a clear and significant implication that is directly relevant to any of my issues or questions, this can be referred to in your written statement and I shall have regard to it.

**Matters, issues and questions**

My matters, issues and questions are set out in Annex 2 to this note.

**William Fieldhouse**

Inspector
11 June 2020

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⁵ DMBC7 to DMBC14.
**ANNEX 1**

**Written statements**

Any representor may submit a hearing statement or statements. However, these should only be in response to questions that relate to their original representations. Statements should set out the key points from their original representation against the relevant questions, and not introduce new arguments. Statements should be concise and focussed, and in any event must contain no more than 3,000 words for each matter.

The Council should produce a statement for every matter. This should also be focused and succinct. However, because the Council has to answer every question, it may be necessary to go over the limit of 3,000 words per matter.

Written statements are not the opportunity to introduce new evidence. Rather, they should refer to evidence on the examination website or that which was submitted with representations made under regulation 20. If the Council or any representor considers that there is evidence that it is essential to refer to in order to answer one of my questions, but which is not on the examination website, please check with the Programme Officer before submitting it.

All statements should directly answer my specific questions. Where appropriate, reference should be made to relevant parts of the National Planning Policy Framework ("NPPF") (paragraph numbers) and associated Planning Practice Guidance ("PPG") (eg ID: 18a-001-20190723) with an explanation of why you think the policy in question is consistent or inconsistent with it. Reference should also be made to specific parts of evidence in the examination library. However, there is no need to quote extensive parts of the NPPF, PPG or evidence documents.

If your response to one of my questions concludes that the relevant part of the Plan is not sound, please set out how you think it should be modified to ensure that it is.

All statements and appendices must be emailed to the Programme Officer in Word or PDF format by the deadline when that has been set. Please ensure that your name and representor reference number is clearly written in the top right corner of the first page.

Written statements will be published on the examination website as soon as possible after the deadline so that they are available to all participants and anyone else who wishes to read them. Because they will be available in this way, they will not be circulated directly to participants. Anyone who is unable to access them on the website should contact the Programme Officer.

Once the date for submitting written statements has passed, no other written evidence will be accepted, unless I specifically request it.

End of Annex 1
Matters, issues and questions

M1. Legal and Procedural Requirements and other General Matters

The duty to cooperate

The Council’s Statement of Compliance with the Duty to Cooperate, Statement of Common Ground, and response to PQ1 set out how it worked with other local authorities and relevant prescribed bodies to address strategic matters during the preparation of the Plan.

<table>
<thead>
<tr>
<th>Q1.1. Is there any substantive evidence to demonstrate that, during the preparation of the Plan, the Council failed to undertake effective and on-going joint working with relevant bodies on strategic matters that affect other local planning authority areas?</th>
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Public consultation and engagement

The Council’s Statement of Consultation sets out how it involved residents and other stakeholders in preparing the Plan and concludes that consultation was undertaken in accordance with the relevant regulations and the Council’s Statement of Community Involvement.

<table>
<thead>
<tr>
<th>Q1.2. Is there any substantive evidence to demonstrate that the public consultation carried out during the plan-making process failed to comply with the Council’s Statement of Community Involvement or legal requirements?</th>
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</table>

<table>
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<tr>
<th>Q1.3. Was the Plan shaped by early, proportionate and effective engagement with communities, local organisations, businesses, infrastructure providers and operators, and statutory consultees?</th>
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Sustainability appraisal

The Council carried out a sustainability appraisal during the preparation of the Plan and submitted a report, various appendices and an addendum in March 2020.

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<tr>
<th>Q1.4. Is there any substantive evidence to demonstrate that the sustainability appraisal failed to meet the relevant legal requirements?</th>
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7 Section 33A of the Planning and Compulsory Purchase Act 2004 ("the 2004 Act").
8 CSD12 and CSD13.
9 “Strategic matters” are defined in section 33A(4) of the 2004 Act and include sustainable development or use of land that has or would have a significant impact in at least two planning areas.
10 CSD10.
11 CSD9.
12 CSD7 and CSD7.1 to CSD7.9.
Q1.5. Did the sustainability appraisal consider and compare reasonable alternatives as the Plan evolved, including for the broad spatial distribution of housing, economic and other development? Was the Plan informed by the findings of the sustainability appraisal?

Habitats Regulations Assessment

The Habitat Regulations Assessment (HRA)\textsuperscript{14} concludes that the Plan will not have adverse effects on the integrity of protected habitats sites in or around the Borough\textsuperscript{15}.

Q1.6. Does the HRA comply with relevant legal requirements\textsuperscript{16}, and is there any substantive evidence to indicate that its conclusions are incorrect?

Equalities

The Council’s \textit{Equalities Impact Assessment and Due Regard Statement}\textsuperscript{17} sets out how the Council considered the effect that the Plan would have on different sectors of the community including people who share a “protected characteristic”\textsuperscript{18}. The Council’s response to PQ4 summarises how it considers the Plan will affect people from those different groups and the other two aims of section 149(1) of the \textit{Equality Act 2010}.

Q1.7. Is there any substantive evidence to indicate that the Plan would have significant effects on equalities and in particular on groups with protected characteristics that have not been identified in the Council’s assessment?

Plan period

The Council’s response to PQ7 advises that the Plan’s strategic policies in relation to housing and economic development identify sufficient land to meet the needs to at least 2036, despite the plan period ending in 2035.

Q1.8. Is the Plan consistent with national planning policy that expects strategic policies to look ahead over a minimum 15 year period from adoption, or is it otherwise justified?

Monitoring

The Council is required to publish monitoring reports, at least once a year, setting out the extent to which the Plan’s policies are being achieved\textsuperscript{19}. The

\begin{itemize}
\item \textsuperscript{14} SDEB35.
\item \textsuperscript{15} Thorne Moors, Hatfield Moors, Lower Derwent Valley, River Derwent and Humber Estuary.
\item \textsuperscript{16} Conservation of Habitats and Species Regulations 2018 (as amended).
\item \textsuperscript{17} CSD8.
\item \textsuperscript{18} The \textit{Equality Act 2010} defines “protected characteristics” as: age; disability; gender reassignment; marriage and civil partnerships; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
\item \textsuperscript{19} Section 35 of the 2004 Act and regulation 34 of \textit{The Town and Country Planning (Local Planning) (England) Regulations 2012} (as amended) (“the 2012 Regulations”).
\end{itemize}
Council will need to review the Plan’s policies to assess whether they need updating at least once every five years, and then update the Plan as necessary.\textsuperscript{20}

Paragraphs 15.12 to 15.14 explain how the Council will monitor the Plan, and Appendix 12 includes monitoring indicators, targets/direction of travel, and key delivery partners for the vision, objectives and most policies.

Q1.9. Will the approach set out in paragraphs 15.12 to 15.14 and Appendix 12 ensure that the Plan can be effectively monitored so that the extent to which its policies are being achieved will be clear?

\textit{Strategic policies and neighbourhood plans}

Local plans are required to make explicit which policies are strategic policies having regard to national policy and guidance.\textsuperscript{21} The Plan identifies 33 policies as being strategic. The Council’s response to PQ2 advises that these are of particular importance to delivering the Plan’s vision and objectives, and that they were categorised as strategic having regard to relevant national policy and guidance.

Neighbourhood plans in the Borough will need to be in general conformity with the Plan’s strategic policies and should not undermine them or promote less development.\textsuperscript{22}

The Council’s response to PQ5 confirms that neighbourhood plans are in place for Armthorpe, Bawtry, Bughwallis, Edlington and Tickhill and advises that there are six other neighbourhood areas designated with plans at various stages of preparation.

The Council’s response to PQ6 explains why the Plan does not set out a housing requirement for each designated neighbourhood area as referred to in NPPF paragraph 65. It suggests a change to make clear that there is no requirement for any neighbourhood plan to allocate additional housing sites but they can provided that they are in general conformity with the strategic policies in the Plan.

Q1.10. Does the Plan set an appropriate framework, and allow an appropriate role, for neighbourhood plans having regard to current progress in their preparation in the Borough? In particular:

\begin{itemize}
  \item[a)] Does the Plan appropriately identify “strategic policies”?
  \item[b)] To be effective, is it necessary for the Plan to be modified to include a housing requirement for each designated neighbourhood area?
\end{itemize}

\textsuperscript{20} NPPF 33.
\textsuperscript{21} NPPF 20 to 23 and PPG ID:41-076-20190509.
\textsuperscript{22} NPPF 29.
Climate change

The Council’s Topic Paper 1: Climate Change and the Local Plan\textsuperscript{23} and response to PQ3 describes how the Plan aims to ensure that the development and use of land in the Borough contribute to the mitigation of, and adaptation to, climate change\textsuperscript{24}.

Q1.1. Is the Plan consistent with national planning policy relating to the mitigation of, and adaptation to, climate change?

Flood risk

Over 40\% of the Borough is at medium to high risk of flooding, including parts of Doncaster urban area and several towns and villages\textsuperscript{25}. The functional floodplain and other areas at medium or high risk of flooding are indicated on Figure 12.

Policies 57 and 58 set out the Council’s development management approach to drainage and flood risk and are considered under matter 1\textsuperscript{4}. This issue is concerned with how flood risk was taken into account in determining the spatial strategy and which sites to allocate for development in the Plan.

The Council’s Topic Paper 2: Flood Risk\textsuperscript{26} and Housing and Employment Site Selection Methodology and Results Report\textsuperscript{27} describe how the policies and proposals in the Plan were informed by evidence about flood risk, including a strategic flood risk assessment\textsuperscript{28}, and the application of a sequential test as set out in national policy and guidance in the context of the Borough’s settlement hierarchy.

The Council’s response to PQ11 provides information about the following allocations that did not have planning permission on 1 April 2018 which are wholly or partly in flood zones 2 or 3:

\begin{itemize}
  \item Employment allocations
    \begin{itemize}
      \item Thorne North, M18 junction 6 (001)
      \item Carcroft Common (441)
      \item Bankwood Lane, Rossington (1032)
    \end{itemize}
  \item Housing allocations
    \begin{itemize}
      \item 255 Hungerhill, Edenthorpe
      \item 247 Rossington Colliery*
      \item 081/343 Alexandra Street, Thorne
      \item 396 North Eastern Road, Thorne*
      \item 501 Marshlands Road, Moorends
      \item 195 Askern Miners Welfare**
      \item 147 Hatfield Lane, Barnby Dun*
    \end{itemize}
\end{itemize}

\textsuperscript{23} DMBC1.
\textsuperscript{24} Section 19(1A) of the 2004 Act.
\textsuperscript{25} Plan paragraph 2.26.
\textsuperscript{26} DMBC2.
\textsuperscript{27} SDEB46.
\textsuperscript{28} SDEB13 and SDEB14.
Only parts of these three sites are in flood zones 2 or 3, and the Plan assumes that no housing development will take place in those areas.

** 70% of the site is flood zone 1, and only 7 (out of 50) dwellings would be in flood zone 2 based on planning permission granted since 1 April 2018.

Q1.12. Are the spatial strategy and allocations in the Plan, including those listed above, consistent with national planning policy relating to development and flood risk?

** Viability evidence to inform the Plan

Plans should set out the contributions expected from development ... such policies should not undermine the deliverability of the plan²⁹.

The Council has provided evidence about the economic viability of development proposed in the Plan³⁰. The Council’s response to PQ32 includes an additional viability appraisal that takes account of all of the policy requirements in the submitted Plan³¹. This indicates that most housing development in the high value market areas defined on the map in Appendix 5 of the Plan is likely to be viable, whereas most housing development in other parts of the Borough is unlikely to be viable if all of the Plan’s policy requirements are met.

The Council’s response to PQ33 indicates that a total of 12,125 dwellings are expected to be built in the high value market areas and 3,794 in other parts of the Borough. Of those 3,794 dwellings outside the high value market areas, 3,141 had planning permission on 1 April 2019 and 653 would be on allocations that did not have planning permission on that date. Of those 653, some are now subject to a planning application or permission, and most of the others are on sites owned by the Council.

Q1.13. Is the Council’s viability evidence proportionate and up to date having regard to relevant national policy and guidance³²? Are the policy requirements set at a level such that the cumulative cost of all relevant policies will not undermine deliverability of the Plan?

** Developer contributions and viability assessments at planning application stage

The role for viability assessment is primarily at the plan making stage. Where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage³³.

Policy 66 sets out the Council’s approach to seeking planning obligations to ensure that development is planned in step with, and makes appropriate contributions towards, necessary infrastructure, whilst ensuring that development viability is not put at risk. The Council has suggested a change to

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²⁹ NPPF 34.
³⁰ SDEB48.1, SDEB48.2, SDEB48.3, SDEB49 and section 8 of SDEB46.
³¹ Appendix PQ32.
³² PPG ID:10 (20190509).
³³ PPG ID:10-002- and 007-20190509.
part A to include an additional criterion referring to pooled contributions to reflect a recent change to the *Community Infrastructure Levy Regulations*\(^ {34}\).

Policy 67 sets out the circumstances in which the Council will support development proposals that are unable to make the full contribution through planning obligations (to meeting policy requirements in the Plan) due to viability issues.

Q1.14. Is policy 66 justified and consistent with national policy and guidance relating to the use of planning obligations\(^ {35}\)? Is the Council’s suggested change necessary to make the Plan sound?

Q1.15. Is policy 67 consistent with national policy and guidance relating to the use of viability assessments at the planning application stage\(^ {36}\)?

**M2. Quantity of Development needed in the Borough**

*Employment land*

Policy 3 in the Plan sets out a strategic aim to facilitate the delivery of at least 481 hectares of employment land to accommodate business, light industry, manufacturing and warehouse and distribution uses. Policy 4 states that only B1b/c, B2 and B8 uses will be permitted on that land. Paragraph 4.63 explains that B1a offices are main town centre uses meaning that they must satisfy the requirements of policy 23 which sets out a sequential approach.

Paragraph 4.25 in the Plan describes the aim as ambitious but credible, and paragraph 4.26 advises that it is based on achieving 1% job growth. The Council’s main evidence is set out in the *Economic Forecasts and Housing Needs Assessment* (June 2018); the *Employment Land Need Assessment* (March 2020), and the *Employment Land Supply Buffer Note* (March 2020)\(^ {37}\).

The *Economic Forecasts and Housing Needs Assessment* indicates that a total of 28 hectares of net additional employment land would be needed between 2015 and 2032 under the baseline scenario (0.6% job growth), or 193 hectares under the policy led scenario (1% job growth)\(^ {38}\). The Council’s subsequent *Employment Land Need Assessment* indicates a need for 481 hectares for the Plan period 2015 to 2035 under the 1% job growth scenario. This took account of the job growth sectors expected and associated floorspace and land requirements, and includes allowances for churn/frictional vacancy and choice\(^ {39}\).

According to the *Employment Land Review 2018*, between 2000 and 2017, 483 hectares of employment land were developed in the Borough. Of this, 394 hectares was for B class uses, with the other 89 hectares for other uses\(^ {40}\).

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\(^{34}\) CSD5.  
\(^{35}\) PPG ID:23b (20190901).  
\(^{36}\) PPG ID:10 (20190509).  
\(^{37}\) SDEB44, SDEB8 and SDEB9.  
\(^{38}\) SDEB44 paragraph 5.10.  
\(^{39}\) SDEB8 chapter 6.  
\(^{40}\) SDEB10 section 2.5 table 2.
Q2.1. Is the strategic aim in policy 3 to facilitate the delivery of at least 481 hectares of land for business (B1), general industry (B2) and storage and distribution (B8) uses over the plan period (2015 to 2035) justified and positively prepared?

**Offices, retail, and leisure uses**

The Council’s evidence indicates a need for 115,163 sqm of additional office floorspace over the Plan period. The quantitative and qualitative need for retail and leisure development is set out in the *Retail, Leisure and Town Centre Study* (2015) with further information in the *Doncaster Local Plan Retail Strategy* (2019) and *Retail Topic Paper* (2020). This indicates the following quantitative needs for additional retail floorspace in the Borough between 2015 and 2032:

- **Comparison goods**: 12,300 sqm to 33,700 sqm
- **Convenience goods**: up to 8,300 sqm

Q2.3. Is the Plan based on adequate and proportionate evidence about the quantitative and qualitative need for office, retail and leisure development in the Borough? To be effective, is it necessary for the Plan to be modified to state what those needs are?

**Housing requirement for the Plan period 2015 to 2035**

To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need can be met over the plan period.

Policy 3 in the Plan sets out a strategic aim to facilitate the delivery of 18,400 new homes in the period 2015 to 2035 (920 per year). Paragraph 4.38 advises that the Plan takes as its minimum starting point a local housing need of 585 homes per year based on the Government’s standard method. However, it goes on to state that an additional 327 homes per year are needed to meet planned economic growth meaning that the objectively assessed need for housing is 912 homes per year (net). The Council’s main evidence is set out in *Economic Forecasts and Housing Needs Assessment* (June 2018).

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41 SDEB8 Table 12.
42 SDEB4.1 to SDEB4.4, SDEB41, and DMBC5.
43 NPPF expects plans to look at least ten years ahead when allocating sites for main town centre uses.
44 SDEB4.1 Table 9.1.
45 SDEB4.1 Table 9.2.
46 NPPF 60 and 65.
47 SDEB44.
The Council’s response to PQ21 advises that the housing requirement for the plan period (2015-2035) is a range: 11,700 (20 x 585) to 18,400 (20 x 920) dwellings\(^{48}\).

**Q2.4.** Does the Plan clearly establish a housing requirement figure for the Borough for the Plan period as required by national policy?

**Q2.5.** Is expressing the housing requirement as a range consistent with national policy or otherwise justified? If so, what should the bottom of the range be (assuming that it must be a fixed figure)?

The Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. Such circumstances could include where:

- there are growth strategies that are likely to be deliverable (for example where funding is in place to promote and facilitate additional growth); or
- previous levels of housing delivery are significantly greater than the outcome from the standard method\(^ {49}\).

The *Economic Forecasts and Housing Needs Assessment* (June 2018) used the emerging targets in the Sheffield City Region’s update to its Strategic Economic Plan as the basis for a policy-led growth scenario. Assumptions were made about economic activity rates, unemployment, double-jobbing and commuting to calculate the additional population that would need to live in the Borough to meet an increase in job demand of around 1,565 (1%) per year. This was then converted into a need for a total of 1,073 net additional homes per year between 2015 and 2032, or 912 per year between 2016 and 2026 (the assessment period used in the standard method)\(^ {50}\).

Figure 16 in the *Housing Topic Paper*\(^ {51}\) indicates an average of 658 net additional homes in the Borough each year between 2004 and 2018. The Council’s response to PQ20 advises that census data indicate an average of 766 net additional dwellings between 2001 and 2011, and that if its own completions data are used to cover the period from 2011 to 2018 together this shows an average of 778 between 2001 and 2018.

An increase in the total housing figures included in the Plan should be considered where it could help deliver the required number of affordable homes\(^ {52}\).

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\(^{48}\) The Council’s response to PQ23 states that the intention is to avoid setting an actual figure for the bottom of the range in the plan/policy itself but rather that would vary throughout the Plan period reflecting the latest inputs to the Government’s standard methodology for calculating local housing need. This is considered as part of matter 5 under the five year requirement.

\(^{49}\) PPG ID:2a-010-2019-0220.

\(^{50}\) SDEB44 paragraphs 2.19-2.40 and 4.29-4.31.

\(^{51}\) DMBC4.

\(^{52}\) PPG ID:2a-024-2019-0220.
Paragraph 6.9 of the Plan states that there is a need for an additional 209 affordable homes per year over and above the Council’s own build programmes. The Council’s response to PQ34 advises that a total of 3,461 affordable homes could be delivered between 2015 and 2035 (average 173 per year) taking account of completions up to 2019, commitments, and allocations in the context of policy 8. Additional affordable homes are also likely to be provided with funding from the Council’s own delivery programme, commuted sums from some smaller sites, and clawback arrangements in some planning obligations.

Q2.6. Is the strategic aim in policy 3 to facilitate the delivery of 18,400 new homes in the period 2015 to 2035 (920 dwellings per year) justified and positively prepared? In particular:

a) Is it appropriate to plan for a higher figure than the standard method indicates (585 homes per year)?

b) Are the economic growth assumptions upon which the strategic aim of 18,400 new homes is based aspirational but deliverable between 2015 and 2035?

c) If such economic growth were to materialise, would it be likely to affect demographic behaviour to the extent that an additional 335 homes are needed every year between 2015 and 2035 (on top of the 585 per year that the standard method indicates are needed)?

d) Do previous levels of housing delivery in the Borough indicate a need for more than 585 homes per year?

e) Should the Plan aim to deliver more than 585 homes per year in order to help meet the need for affordable homes?

M3. Strategic Approach

Presumption in favour of sustainable development

NPPF paragraph 11 sets out the presumption in favour of sustainable development and what that means for both local plans and making decisions about development proposals. National guidance states that there is no need for a plan to directly replicate the wording in paragraph 11 in a policy.53

Q3.1. Is the presumption in favour of sustainable development set out in policy 1 consistent with national policy and would it be effective in helping decision makers know how to react to development proposals?

Spatial strategy

Q3.2. Is the broad spatial distribution of development proposed in policies 2 and 3 justified? In particular, the aims to accommodate:

a) At least 50% of new homes in and around the Main Urban Area; approximately 40% at seven Main Towns; and about 10% at ten Service Towns and Villages.

b) The ranges for the number of new homes in and around each of the individual Main Towns and Service Towns and Villages.

53 PPG ID:61-036-20190723.
c) Major new employment sites in locations accessible from the Main Urban Area and Main Towns in locations attractive to the market with good access to the strategic transport network as well as Doncaster Sheffield Airport.

d) Retail, leisure, office, cultural and tourist developments in the network of town centres defined in Table 2.

Table 3.3 in the addendum to the sustainability appraisal\(^{54}\) compares the distribution of homes proposed in policy 3 with the actual distribution of homes proposed in site specific policies in the Plan.

Q3.3. Is the broad spatial distribution of development proposed by the employment and housing allocations in policies 4 and 6 justified having regard to the aims set out in policies 2 and 3? Are any main modifications required to ensure that the Plan is unambiguous and internally consistent in this respect?

Plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. They should be focussed, concise and as accessible as possible\(^{55}\).

The Council’s response to PQ14 sets out a potential change to policy 2 aimed at highlighting the specific parts that a decision maker should use to react to a development proposal. This would involve removing 8 of the 10 first paragraphs from the policy and including them in a separate text box (similar to that for the Plan’s vision) entitled “spatial strategy”.

Q3.4. Is the suggested change to policy 2 set out in the Council’s response to PQ14 necessary to make the Plan sound?

Policy 2 states that decisions on the location and scale of development should be informed by the settlement hierarchy which should be read in conjunction with policy 3. Policy 3 includes a table that sets out numbers of new homes for Doncaster Main Urban Area, the Main Towns and the Service Towns and Larger Villages. The Council’s response to PQ15 advises that the primary purpose of the table in policy 3 is to explain and justify the distribution of growth proposed through allocations in the Plan. However, it also suggests that the figures for the number of new homes in each of the named settlements would be relevant to making decisions about development proposals in some circumstances.

Q3.5. Is the approach to deciding development proposals based on the figures for new homes set out in policy 3 for Doncaster Main Urban Area, the Main Towns and the Service Towns and Larger Villages justified, and is it sufficiently clear to be effective?

**Defined Villages and Countryside**

Policy 2 indicates that the Borough’s Countryside is defined as land beyond the development limits of settlements (including the 40 Defined Villages) designated on the Policies Map (other than that which is designated as Green Belt). In the

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\(^{54}\) CSD7 (March 2020).

\(^{55}\) NPPF 16(d) and PPG ID:61-002-20190315.
Countryside, development will be subject to policy 26, other than in a limited number of circumstances set out in policy 2 part 5. Policy 2 part 5 A to E will be considered under matter 5 (five year housing land supply). The approach to housing in relation to Defined Villages and Countryside will be considered under matter 7.

**M4. Green Belt**

The Council’s *Topic Paper 3: Green Belt* aims to summarise the work it undertook in relation to Green Belt in order to inform the preparation of the Plan\(^{56}\).

The Council’s response to PQ8 clarifies that the Plan proposes to remove eight sites from the Green Belt in order to meet housing needs at the Main Urban Area, one Main Town, and five Service Towns and Villages. In total, those sites have capacity for 1,002 dwellings, all of which are expected to be delivered in the Plan period. The eight sites are:

- Sheffield Road, Warmsworth (Main Urban Area) 112 dwellings
- Alverley Lane, Balby (Main Urban Area) 150 dwellings
- Sheffield Road / Old Road, Conisbrough 200 dwellings
- Westwood Road, Bawtry 20 dwellings
- North of A1, Skellow 300 dwellings
- Plot 3, Harlington 66 dwellings
- North of Cadeby Road, Sprotbrough 80 dwellings
- Sunderland Street, Tickhill 74 dwellings

The Council’s response to PQ8 advises that a number of other changes have been made to the Green Belt:

- One small site removed from the Green Belt.
- Three sites which have been developed removed from the Green Belt.
- Minor amendments to correct mapping errors arising from digitising the original UDP paper Policies Map.
- 19 hectares added to the Green Belt south of the former Rossington colliery.

Section 13 of the NPPF sets out national policy relating to the protection of Green Belt land. It makes clear that once established (as is the case in Doncaster), Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, and sets out a number of factors that will need to be assessed to decide if that has been demonstrated.

The Council’s response to PQ8 includes maps of all changes to the Green Belt (other than the minor amendments) and a summary of what it considers to be the exceptional circumstances that justify each change.

**Accommodating development in non Green Belt locations**

\textbf{Q4.1.} Were all reasonable options for meeting identified development needs in non Green Belt locations fully examined during the preparation of the Plan? In particular:

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\(^{56}\) DMBC3.
a) Does the Plan make as much use as possible of suitable brownfield sites and underutilised land?

b) Would the Plan be effective in optimising the density of development and making effective use of land in line with chapter 11 of the NPPF?

c) What would the consequences be for sustainable development of accommodating all development needed during the Plan period in non Green Belt locations?

d) Was the Plan informed by discussions with neighbouring authorities about whether they could accommodate some of the Borough’s identified need for development?

Sustainable patterns of development

The Council’s response to PQ8 indicates that the housing allocations removed from the Green Belt are all necessary to help meet the housing targets for particular settlements and the spatial strategy set out in policies 2 and 3.

Q4.2. Assuming it is necessary to remove land from the Green Belt, did the approach taken in the Plan give first consideration to land which has been previously developed and/or is well served by public transport?

Q4.3. Would development on each of the eight housing allocations removed from the Green Belt promote sustainable patterns of development?

Green Belt purposes

NPPF 134 sets out five purposes that Green Belt serves. The following four are relevant to the Borough:

- To check the unrestricted sprawl of a large built up area.
- To prevent neighbouring towns merging into one another.
- To assist in safeguarding the countryside from encroachment.
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Q4.4. How would development on each of the eight housing allocations removed from the Green Belt affect the purposes of including land in the Green Belt?

Green Belt boundaries

NPPF 139 sets out how plans should define Green Belt boundaries. The Policies Map defines Green Belt boundaries around the areas that the Plan proposes to remove from and add to the Green Belt. All other Green Belt boundaries in the Borough had already been defined.

The Council’s response to PQ10 suggests that changes should be made to the Plan to ensure that it is effective in creating more readily recognisable Green Belt boundaries at four of the housing allocations removed from the Green Belt: Sheffield Road, Warmsworth; Plot 3, Harlington; north of Cadeby Road, Sprotbrough; and Sunderland Street, Tickhill.
Q4.5. Are the suggested changes in the Council’s response to PQ10 necessary to make the Plan sound, and would they ensure that the proposed boundaries around each of the eight housing allocations removed from the Green Belt are clearly defined using physical features that are readily recognisable and likely to be permanent?

Q4.6. Will the proposed Green Belt boundaries around each of the eight allocations removed from the Green Belt need to be altered again at the end of the Plan period?

Compensatory improvements to the Green Belt

NPPF 138 advises that where it has been concluded that it is necessary to release Green Belt land for development, plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

The Council’s responses to PQ9 and PQ10 suggest that changes are needed to the Plan so that it is effective in securing compensatory improvements to the Green Belt at a proposed country park at the former Rossington colliery and on land close to each of the eight housing allocations that are removed from the Green Belt.

Q4.7. Are the suggested changes set out in the Council’s responses to PQ9 and PQ10 necessary to make the Plan sound, and would they be effective in securing compensatory improvements to the environmental quality and accessibility of remaining Green Belt land that would offset the impact of removing the eight housing allocations from the Green Belt?

Exceptional circumstances for changes to the Green Belt

Having regard to the above, and any other material considerations ...

Q4.8. Have exceptional circumstances to justify removing each of the eight housing allocations from the Green Belt been fully evidenced and justified?

Q4.9. Have exceptional circumstances to justify making the other changes to the Green Belt referred to in the Council’s response to PQ8 been fully evidenced and justified?

Q4.10. Assuming that I conclude that the Plan identifies sufficient land to ensure that justified development needs can be met in suitable locations throughout the Plan period, would there be exceptional circumstances to justify taking additional land out of the Green Belt at the present time, for example to try to ensure that Green Belt boundaries will not need to be altered again at the end of the Plan period?
Development in the Green Belt

Policy 2 part 6 sets out the Plan’s Green Belt development management policy. The Council’s response to PQ14 advises that this gives almost total deference to the NPPF, with local interpretation of the meaning of “infill development”, in the context of NPPF paragraph 145e, being the only development management policy considered necessary to include in the Plan.

Q4.11. Is policy 2 part 6 justified and consistent with national policy relating to development in the Green Belt, in particular that related to “limited infilling in villages”?  

M5. Housing Supply

Site selection methodology

Q5.1. Was the approach to determining which sites to include as housing allocations in the Plan described in the Site Selection Methodology and Results Report justified and consistent with national policy and guidance?

Overall supply for the Plan period 2015 to 2035

Table 5 in the Plan summarises the housing land supply. The Council’s Schedule of Minor Typographical and Cartographical Amendments suggests some changes to the figures. Based on those amendments, the supply for the Plan period 2015 to 2035 identified in Table 5 is as follows:

<table>
<thead>
<tr>
<th>Description</th>
<th>Figures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Net completions 2015 to 2018</td>
<td>3,400</td>
</tr>
<tr>
<td>Expected completions on allocations with planning permission at 2018</td>
<td>9,289</td>
</tr>
<tr>
<td>(Tables H1 A-O in Chapter 16 of the Plan)</td>
<td></td>
</tr>
<tr>
<td>Expected completions on other commitments at 2018 not allocated in the Plan (small sites and in Defined Villages)</td>
<td>585</td>
</tr>
<tr>
<td>Expected completions on allocations without planning permission</td>
<td>6,630</td>
</tr>
<tr>
<td>(Tables H2 A-Q in Chapter 16 of the Plan)</td>
<td></td>
</tr>
<tr>
<td>Total 2015 to 2035</td>
<td>19,904</td>
</tr>
</tbody>
</table>

Paragraph 4.77 in the Plan refers to some of the supply being capped. The Council’s response to PQ28 clarifies that the notion of capping was used to inform the distribution of allocations across the Borough and that there are no policies in the Plan that would prevent any of the supply being delivered during the Plan period.

The Council’s responses to PQ26 and PQ27 identify further sources of supply during the Plan period:

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57 NPPF 145(e).
58 SDEB46.
59 NPPF section 5 and PPG ID:3 and ID:68.
60 CSD6.
Windfalls (200 per year 2018-2035)\textsuperscript{61} 3,400
Windfalls at Defined Villages (policies 2 and 3) 290
Windfalls on sites identified in the brownfield register 2019 197
Total windfalls 3,887

In total, the above would represent a supply of 23,791 dwellings between 2015 and 2035\textsuperscript{62}. This compares to the strategic aim set out in policy 3 of delivering 18,400 new homes in that period.

In addition, a total of 2,292 new homes are expected to be built on a number of allocations after 2035 due to the delivery trajectory for those particular large sites. However, there are no policies in the Plan that would prevent those being completed before 2035.

Policy 7 proposes the development of 280 new homes at Doncaster Sheffield Airport on allocated site 940E2 and potentially a further 920 on site 940E3 dependent on job growth. Paragraph 5.4 of the Plan states that the airport is an economic priority both for Doncaster and Sheffield City Region and it will play a key role in driving the local and regional economy. The strategic aim of delivering 18,400 new homes is in part to accommodate additional household growth to meet the Council and City Region’s growth ambitions\textsuperscript{63}. Despite this, paragraph 4.78 advises that none of these 1,200 dwellings are accounted for in the housing land supply and the Council’s response to PQ27 confirms that any completions on the allocated sites at the airport would not be counted towards achieving the aim of delivering 18,400 new homes.

“Reserve sites” identified in the Plan have potential capacity to accommodate 1,438 new homes. However, paragraph 4.82 of the Plan states that, due to HS2 and flood risk, there is doubt about whether they could be developed in the Plan period meaning that they have not been factored into housing supply.

| Q5.2. Assuming it is modified to include the figures in CSD6, does the Plan identify sufficient land to ensure that the strategic aim of delivering 18,400 new homes in the Plan period 2015 to 2035 can be achieved? In particular, is there a reasonable prospect of:
| a) 9,289 new homes being built on allocations with planning permission at 2018?
| b) 585 new homes being built on other commitments at 2018?
| c) 6,630 new homes being built on allocations without planning permission at 2018? |

| Q5.3. Should Table 5 of the Plan be modified to include the following, having regard to policies 2, 3 and 11 relating to development on unallocated sites and policy 7 relating to Doncaster Sheffield Airport:
| a) a windfall allowance of 3,400 new homes, or some other figure?
| b) 290 windfalls at Defined Villages? |

\textsuperscript{61} Paragraph 4.83 of the Plan refers to windfalls averaging 419 per year 1999-2011 and 494 per year 2011-2015. The Council’s response to PQ26 refers to an anticipated supply of around 200 windfalls per year 2018-2035.

\textsuperscript{62} 19,904 + 3,887 = 23,791.

\textsuperscript{63} Paragraphs 4.37 and 4.38 of the Plan and SDEB44 paragraph 2.20 to 2.40.
c) 197 new homes on windfalls on sites identified in the brownfield register 2019?

d) New homes at Doncaster Sheffield Airport?
Should any such housing completions count towards achieving the aim of delivering 18,400 new homes in the Plan period?

Q5.4. To be effective, should Table 5 of the Plan and/or other parts of the reasoned justification for policy 6 be modified to set out explicitly what the total housing supply is for the Plan period 2015 to 2035?

Small and medium sized sites

NPPF 68 requires local planning authorities to identify through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare (unless it can be shown that there are strong reasons why this 10% target cannot be achieved). Paragraph 4.81 of the Plan indicates that 8% of the requirement may be met on such sites. However, the Council’s response to PQ31 advises that further sites have been identified in the brownfield register 2019, meaning that now there are opportunities to build a total of 2,320 dwellings on small and medium sized sites. This represents nearly 13% of the requirement for 18,400 over the Plan period.

Q5.5. Will the Plan be effective in helping to ensure that at least 10% of the housing requirement is met on sites no larger than one hectare? Is it necessary to modify paragraph 4.81 of the Plan as set out in the Council’s response to PQ31?

Five year housing land requirement

National guidance advises that housing requirement figures in adopted strategic policies should be used for calculating the five year housing land supply figure. Where strategic policy-makers have successfully argued through plan-making and examination for a requirement set out as a range, the five year land supply will be measured against the lower end of the range.

Policy 3 states that for the purposes of calculating five year housing land supply, the requirement will be based on the local housing need figure as derived from the standard method reviewed and revised through the plan period in line with the latest household projections and affordability ratio.

The Council’s response to PQ23 suggests that the use of a fixed figure as the bottom of the range would mean that the Plan would date very quickly which they consider would be unhelpful. The Council also considers that the Government’s standard method for calculating local housing need may change, and that variable figures are a common feature of the planning system.

The Council’s response to PQ21 states that the housing requirement for the Plan period is the range 11,700 (20 x 585) to 18,400 (20 x 920). If the five year supply

64 PPG ID:68-005 and 027-20190722.
requirement were based on the bottom of that range and no account were taken of completions since 2015 it would be 3,218 dwellings\textsuperscript{65}. This includes a 10% buffer as required by national policy\textsuperscript{66}.

The Council’s response to PQ25 states that the five year requirement on 1 April 2019 would be 3,042 dwellings if it were calculated as proposed in policy 3 ie based on the latest local housing need figure under the standard method\textsuperscript{67}. If it were based on 920 dwellings per year and it took account of completions since 2015, the five year requirement would be 4,703 dwellings\textsuperscript{68}. If it were based on 920 dwellings per year and it took no account of completions since 2015, the five year requirement would be 5,060 dwellings\textsuperscript{69}.

Q5.6. Is the proposal in policy 3 to have a variable figure for the five year requirement consistent with national policy? Would it be effective in helping to ensure that the need for homes identified in the Plan can be met? If not, how should the five year requirement be calculated?

Five year housing land supply

The Council’s \textit{Five Year Deliverable Housing Land Supply Statement 2019-2024}\textsuperscript{70} identifies total capacity of 6,870 dwellings on sites considered to be deliverable on 1 April 2019. The Council’s response to PQ29 advises that the figure should actually be 7,518 dwellings because the figure in SDEB27 was based on a typographical error. This includes a 10% non-delivery allowance / lapse rate for all sites with or without planning permission (other than those under construction).

The Council’s response to PQ29 breaks down the total five year supply of 7,518 dwellings on 1 April 2019 into five categories consistent with those referred to in the NPPF definition of “deliverable” and windfalls:

A. Sites of <10 dwellings with outline or full planning permission 707
B. Sites of 10 or more dwellings with detailed planning permission 2,978
C. Sites of 10 or more dwellings with outline planning permission (8 sites) 1,183
D. Sites with a grant of planning permission in principle (8 sites) 119
E. Allocations without planning permission (27 sites) 1,531
F. Windfalls 1,000

Total 7,518

National policy advises that sites in categories A and B (total 3,685 dwellings) should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

\textsuperscript{65} 585 \times 5 = 2,925. 2,925 + 293 (10\%) = 3,218.
\textsuperscript{66} NPPF 73(b).
\textsuperscript{67} 553 \times 5 = 2,765. 2,765 + 277 (10\%) = 3,042.
\textsuperscript{68} 18,400 – 4,727 = 13,673. 13,673 / 16 = 855. 855 \times 5 = 4,275. 4,275 + 428 (10\%) = 4,703.
\textsuperscript{69} 920 \times 5 = 4,600. 4,600 + 460 (10\%) = 5,060.
\textsuperscript{70} SDEB27.
Q5.7. Is there clear evidence that any of the 3,685 dwellings on sites with planning permission in categories A and B on 1 April 2019 will not be completed by 31 March 2024?

The Council’s response to PQ30 summarises its evidence for the assumptions about the number of dwellings expected to be delivered within five years on each of the sites that fall into the other categories C, D and E (total 2,833 dwellings). The full evidence is set out in the *Five Year Deliverable Housing Land Supply Statement 2019-2024; Housing & Economic Land Availability Assessment 2018;* and *Topic Paper 4: Housing*.

Q5.8. Has the Council provided clear evidence that a total of 2,833 dwellings will be completed on sites of 10 or more dwellings with outline planning permission, sites with a grant of planning permission in principle, and allocations without planning permission by 31 March 2024?

Housing trajectory

Strategic policies in local plans should include a trajectory illustrating the expected rate of housing delivery over the plan period.

Q5.10. Does Figure 3 in the Plan set out a justified and effective housing trajectory?

Q5.11. Does the trajectory demonstrate that the Plan will be effective in ensuring that there will be a supply of specific deliverable sites sufficient to meet an appropriately calculated five year requirement when the Plan is adopted and thereafter?

Policy 2 part 5: if a five year supply cannot be demonstrated

Policy 2 part 5 states that, if a five year borough-wide supply of housing land cannot be demonstrated, residential development will be allowed in the Countryside if adjacent to a Development Limit of a settlement in levels 1-3 of the hierarchy provided that a number of criteria are met.

Q5.12. Is the approach set out in policy 2 part 5 to allowing development adjacent to the Development Limits of the Main Urban Area, Main Towns, and Service Towns and Villages if a five year borough-wide supply of housing land cannot be demonstrated justified and consistent with national policy?

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71 SDEB27; SDEB45; and DMBC4.
72 NPPF 73.
M6. Housing Development Requirements

Site specific requirements for housing allocations without planning permission

Policy 6 states that the housing allocations without planning permission listed in Tables H2(A-Q) will be developed in accordance with the specified developer requirements set out in Appendix 2. The Council has suggested changes to include an additional requirement relating to heritage assets for site ref 133 (Thorne) and to the boundary of site ref 247 (Rossington colliery).

The requirements relating to the eight housing allocations removed from the Green Belt were considered under matter 4.

Q6.1. Are the development requirements for the housing allocations without planning permission set out in Appendix 2 to the Plan justified? Is there sufficient detail to provide clarity to developers, local communities and other interested parties about the nature and scale of development proposed? Are the Council’s suggested changes to Appendix 2 relating to sites ref 133 (Thorne) and 247 (Rossington) necessary to make the Plan sound?

Housing mix

Q6.2. Is the requirement in policy 8 part A for development to deliver a mix of house size, type, price and tenure to address the needs and market demand in the latest Housing Need Assessment or other robust evidence justified?

The reasoned justification to policy 8 refers to Appendix 4. Appendix 4 provides an indicative breakdown of the number of new affordable and market homes of different types (houses, bungalows and flats) and size (bedrooms) in different settlements based on the Council’s Housing Needs Survey 2019.

Q6.3. Is the inclusion of Appendix 4 in the Plan justified and consistent with the wording of policy 8? Will it be effective in helping to ensure that the need for different types of homes in different parts of the Borough are met throughout the Plan period?

Affordable housing

Paragraph 6.9 of the Plan states that there is an identified need for an additional 209 affordable homes per year over and above the Council’s own build programmes. Paragraph 6.10 makes it clear that the affordable housing requirements of policy 8 part B take account of economic viability as well as housing need. The Council’s response to PQ34 advises that those requirements could deliver around 3,461 affordable homes between 2015 and 2035 (173 per year).

PPG ID:61-002-20190315
The Council’s viability assessments make a number of specific assumptions about affordable housing developments including about developer profits, tenure mix and development values.

Q6.4. Are the requirements of policy 8 part B for housing sites of 15 or more homes (or 0.5 hectares or above) to normally include 23% affordable homes in high value housing market areas or 15% elsewhere justified by adequate, proportionate and up to date evidence about need and viability?

Q6.5. Is the reference in paragraph 6.9 to 75% of the affordable homes being for rent and 25% for low cost home ownership justified? Is it consistent with the national policy expectation that 10% of homes on major sites should be available for affordable home ownership? If the 75%/25% split is justified and consistent with national policy, should it be referred to in policy 8 rather than the reasoned justification?

**Internal space standards**

The Council’s Housing Design Standards Policy Evidence Paper 2019 section 3 sets out the main evidence for the requirement in policy 46 part A for all new housing to meet the Nationally Described Space Standard as a minimum. This includes a finding that the majority of recently built homes in the Borough failed to meet those standards in terms of bedroom sizes and storage space.

The Council’s viability assessments assume dwelling sizes consistent with the space standards.

Q6.6. Is the requirement in policy 46 part A for all new housing to meet the Nationally Described Space Standard as a minimum justified by adequate, proportionate and up to date evidence about need, viability and timing?

**Housing for older people and people with disabilities**

The Council’s Housing Design Standards Policy Evidence Paper 2019 section 2 sets out the main evidence for the requirements in policy 46 parts B and C relating to accessible and adaptable dwellings [M4(2)] and wheelchair adaptable dwellings [M4(3)].

The Council’s response to PQ35 advises that the number of households with over 65 year olds or people with long term health problems or disabilities is expected to increase by 11,925 over the Plan period. The Council estimate that policy 46 part B could deliver a total of 6,291 accessible and adaptable homes and part C a total of 484 wheelchair adaptable homes.

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74 SDEB48.1 and Appendix PQ32.
75 NPPF 64.
76 SDEB25.
77 SDEB48.1 and Appendix PQ32.
78 PPG ID:56-020-20150327.
79 SDEB25.
The Council’s viability assessments assume an additional cost of £1,500 per dwelling to meet the M4(2) standard and an additional cost of £12,500 per dwelling to meet M4(3).

Q6.7. Is the requirement in policy 8 part C for developers to demonstrate how the provision of housing types suitable for older people can be increased, especially bungalows, extra care facilities and supported living accommodation, justified?

Q6.8. Is the requirement in policy 46 part B for at least 65% of all new homes on developments of over 0.5 hectares or 10 or more units to meet Building Regulation standard M4(2) justified by adequate, proportionate and up to date evidence about need, viability and site specific factors such as vulnerability to flooding, site topography, and other circumstances?

Q6.9. Is the requirement in policy 46 part C for at least 5% of all new homes on developments of over 0.5 hectares or 10 or more units to meet Building Regulation standard M4(3) justified by adequate, proportionate and up to date evidence about need, viability and site specific factors such as vulnerability to flooding, site topography, and other circumstances?

Design of housing developments

Chapter 12 of the Plan contains various policies intended to provide a framework for the assessment of the design of development proposals, including for new homes. Policy 45 is specifically about residential design.

Q6.10. Are the requirements in policies 42 to 45 relating to the design of housing developments justified? In particular:
   a) The approach to “standardised or off the shelf” designs in policy 42 part B.
   b) The requirement in policy 43 for all major developments to make use of pre application engagement with the Council, Design Review and urban design tools including masterplans, design guides, and design codes.
   c) The requirement in policy 45 part D for all major developments to utilise Building for Life throughout the design process.
   d) The requirement in policy 42 part D for the provision of public art in all major urban extensions and high profile and prominent developments, particularly in the key priority areas listed and shown on the Policies Map.
   e) The requirements in policy 44 part C relating to all edge of settlement developments.

Backland and tandem development

Policy 45 part C sets out an approach to backland and tandem development aimed at minimising the loss of back gardens. It goes on to state that Bessacarr, Sprotbrough and parts of Thorne Road at Edenthorpe will be “protected from” backland and tandem development. The Council’s response to PQ43 provides

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80 SDEB48.1 and Appendix PQ32.
81 PPG ID:63-009-20190626 and PPG ID:56-007-20150327 and 56-008-20160519.
82 As above.
justification for why those particular places are referred to and suggests changes to the policy and the Policies Map aimed at ensuring that the policy is effective.

Q6.11. Is the approach to backland and tandem development set out in policy 45 part C justified? Are the Council’s suggested changes to the policy and the Policies Map necessary to make the Plan sound and would they be effective in so doing?

Green infrastructure, open space and landscaping in housing developments

Policy 27 aims to protect, improve, and create new green infrastructure and includes particular requirements for developments of 30 or more family homes. The Council has suggested a change so that the requirement would apply to all development on sites of one hectare or more.  

Policy 29 sets out requirements for open space provision in various types of housing development. The Council has suggested a change to the reasoned justification in paragraphs 10.22 and 10.25.

Policy 49 sets out requirements for the landscaping of developments.

The Council’s response to PQ41 clarifies the approach set out in policy 29 and suggests a change to it and the reasoned justification to delete reference to developments addressing “deficiencies” in open space and to alter the requirements for “10% or 15%” of the site or development value to “15%”. The response suggests that consequential amendments would also be needed to policy 27, but does not specify what they are.

Q6.12. Are the requirements in policies 27, 29 and 49 relating to the provision of green infrastructure and open space and the landscaping of housing developments justified and would they be effective? In particular:

a) The requirement in policy 27 part A for all major developments of 30 or more family dwellings to provide a green infrastructure masterplan which demonstrates how ten specified criteria will be met. Is the Council’s suggested change to apply the requirement to all sites of one hectare or more necessary to make the Plan sound and, if so, is it justified?

b) The requirement in policy 29 for development to address open space deficiencies. If it is not sound, would the Council’s suggested change ensure that it is?

c) The requirement in policy 29 part A for developments of 20 or more family dwellings to provide 10% or 15% of the site as on site open space. If it is not sound, would the Council’s suggested change ensure that it is?

d) The requirement in policy 29 part B for developments of 20 or more family dwellings close to a large open space to provide a commuted sum of 10% or 15% of the residential land value of the development site. If it is not sound, would the Council’s suggested change ensure that it is?

e) The requirement in policy 29 part C for developments of between 10 and 20 family dwellings to provide for a commuted sum of 10% or 15% of the residential land value of the development site to improve existing open

83 CSD5.
spaces within the vicinity of the site. If it is not sound, would the Council’s suggested change ensure that it is?
f) The requirement in policy 29 part D for 16 square metres of open space per person in retirement living schemes and/or aftercare facilities.
g) The requirement in policy 49 part C for generous tree, shrub and hedgerow planting and the reference in paragraph 12.38 to a minimum of one tree per dwelling.

Health and education facilities in association with housing developments

Policy 51 includes a requirement for development to consider and address healthcare infrastructure implications. Policy 53 requires on- or off-site mitigation where significant housing proposals will create or exacerbate a shortfall in the number of local school places.

Q6.13. Are the development requirements set out in policy 51 aimed at improving and promoting strong, vibrant and healthy communities justified and will they be effective? In particular, is the meaning of the requirement in part D for relevant development proposals to consider and assess healthcare infrastructure implications clear?

Q6.14. Is the approach to the provision of education facilities in association with residential development set out in policy 53 part B clear, such that it will be effective?

Pollution and noise affecting housing developments

Policy 55 sets out requirements relating to development that may cause or be affected by pollution. Part B deals specifically with noise pollution, and paragraph 13.20 states that guidance in the “accompanying Noise Annex” will be applied. The Council has suggested a minor amendment to clarify that the “Annex” is Appendix 11 in the Plan\(^\text{84}\). This sets out specific thresholds, and states that they will be applied to determine the acceptability of proposals. The Council’s response to PQ44 suggests that the second sentence of policy 55 part B be changed to make clear that when noise assessments are submitted with planning applications they should have regard to the thresholds set out in Appendix 11.

Q6.15. Are the requirements in policy 55 for mitigation measures relating to noise, air quality, water and artificial lighting justified in so far as they relate to residential development? In particular, are the noise standards in appendix 11 justified, and is the change suggested by the Council needed to ensure that the Plan is clear about how they are intended to be taken into account by decision makers?

\(^\text{84}\) CSD6.
Telecommunications and utilities in housing developments

Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).  

Q6.16. Are the requirements in policy 22 for telecommunications and utilities infrastructure provision in housing developments justified and consistent with national policy? In particular, the requirement for connectivity to the fastest technically available broadband network unless this is not possible.

M7. Specific Types of Housing

Housing in the Countryside

Policy 2 defines all non Green Belt land outside the Development Limits of settlements as Countryside. Policies 2, 3 and 26 set out a limited number of circumstances where housing development will be supported in the Countryside. The Council’s response to PQ16 suggests a change to policy 2 part 5 to replace the term “Countryside” with “Countryside Policy Area” in order to make a clearer distinction between other parts of the countryside that are within the Green Belt. This would also require consequential amendments to other parts of the Plan and on the Policies Map.

The last part of part 5 of policy 2 allows residential development in appropriate locations adjacent to the Development Limits of the 14 Defined Villages that are listed in policy 3 provided that a number of criteria are met. The Council’s responses to PQ16 and PQ17 clarify that those 14 villages are surrounded by Countryside rather than Green Belt and suggests a change to make that clear in the title of the first column of the table in policy 3. A change is also suggested to clarify that the individual site/scheme and cumulative growth limits are not intended to apply to, or take account of, proposals within the Development Limits of those 14 Defined Villages that are subject to policy 2 part 4.

The Council’s response to PQ36 advises that there are a number of national policies that deal with rural housing that may be applicable to proposals in the Borough but which are not referred to in the Plan as it is unnecessary to provide local interpretation. A change is suggested to the end of part 3 of policy 26 to clarify that other proposals for new dwellings in the Countryside will be supported in line with national policy for entry level exception sites; rural exception sites; and isolated new homes of exceptional design quality.

Q7.1. Is the approach to housing development in the Countryside set out in policies 2, 3 and 26 justified and consistent with national policy? In particular:
- Are the size limits for an individual scheme/site and cumulative growth limits over the Plan period for residential development adjacent to the 14 Defined Villages set out in policy 3 justified?

85 NPPF 112.
86 NPPF paragraphs 71, 77, 79d and 79e.
• Are the Council’s suggested changes to the title of the first column of the table in policy 3 and footnote 5 relating to the site/scheme and cumulative growth limits for the 14 Defined Villages necessary and would they make the policy effective?
• Is the requirement to demonstrate exceptional circumstances and clear community support for development in the Countryside adjacent to the Development Limit of a Defined Village justified and consistent with national policy?
• Is the Council’s suggested change to the end of part 3 of policy 26 (to clarify that other proposals for new dwellings in the Countryside will be supported in line with national policy) necessary to make the Plan sound?

Custom and self build housing

Q7.2. Will the encouragement to the provision of opportunities for custom build and self build homes given in policy 8 part F, along with the requirement in policy 70 part A.187, be effective in ensuring that sites will be available for people wishing to commission or build their own homes88?

Houses in multiple occupation

Paragraph 6.15 in the Plan advises that houses in multiple occupation can play an important role in meeting the housing need of a range of groups including students, young professionals and individuals on low incomes. However, policy 10 only allows such development under very strict circumstances. The Council’s justification for this is that over-concentrations of houses in multiple occupation can have significant impacts on existing communities due to the high turnover of occupiers, insufficient parking, problems with refuse disposal and collection, overcrowding, noise and, in some cases, anti social behaviour.

The Council has suggested a change to part D and the reasoned justification to refer to ground floor and basement rooms in areas of flood risk89.

Q7.3. Is the approach towards houses in multiple occupation set out in policy 10 justified and positively prepared? In particular:
   a) Will it allow the housing needs of all members of the community to be met, including students, young professionals and individuals on low incomes.
   b) The approach in part E aimed at preventing over-concentrations of houses in multiple occupation within a community/locality/street/row.
   c) Are the changes suggested by the Council to part D and paragraph 6.16 necessary to make the Plan sound?

Gypsies, travellers and travelling showpeople

The Council’s main evidence about the accommodation needs of gypsies and travellers and travelling showpeople is set out in its assessment published in

87 Policy 70 part A.1 requires a minimum of 0.4 hectares of land to be made available for self-build homes as part of the Unity regeneration project between Hatfield and Stainforth.
88 NPPF 61 and footnote 26 and PPG ID:67-003-20190722.
89 CSD5.
Paragraph 6.22 of the Plan states that the Borough has a surplus of 55 pitches and 7 yards “over the next five years” and thus does not require new allocations. The Plan does not specify which five year period it is referring to or identify whether there is likely to be a surplus or shortage of pitches and yards over the rest of the Plan period.

**Q7.4.** Is policy 12, which aims to meet the accommodation needs of gypsies, travellers and travelling showpeople on existing sites/yards with capacity in the Borough, justified and consistent with national policy\(^91\) and would it be effective in ensuring that identified needs for such accommodation can be met over the Plan period?

Paragraph 6.23 advises that some of the existing sites are washed over Green Belt meaning that very special circumstances will need to be demonstrated to justify development within them or an extension to them.

**Q7.5.** Is the approach described in paragraph 6.23 to development at existing designated sites in the Green Belt consistent with national policy\(^92\), and will it be effective in ensuring that needs associated with the occupants of those sites can be met? Should the Plan be modified to inset the designated sites from the Green Belt and allocate them specifically as traveller sites?

**M8. Economic Development**

The need for different types of economic development in the Borough over the Plan period was considered under matter 2. This matter is concerned with establishing whether the Plan identifies sufficient opportunities to meet the need for employment uses which are defined in paragraph 4.62 as B1a (offices, other than those with A2); B1b (research and development); B1c (light industry); B2 (general industry); and B8 (storage and distribution).

The Council’s main evidence for the employment land identified in the Plan is the *Employment Land Review* (2018, with amendments 2019) and *Housing and Employment Land Availability Assessment* (2018)\(^93\).

**Employment policy areas**

Policy 5 states that employment policy areas, as defined on the Policies Map, will continue to be supported primarily for employment uses. Other uses will be supported provided that a number of criteria are met.

The Plan does not specify the total amount of land designated as employment policy areas. Whilst most of the land is occupied by existing employment uses, there are small vacant sites available for development within some of the areas. In total, around 35 hectares of land is available for development within employment policy areas\(^94\).

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\(^{90}\) SDEB22.  
\(^{91}\) *Planning Policy for Traveller Sites* (August 2015) (“PPTS”).  
\(^{92}\) PPTS policy E paragraphs 16 and 17.  
\(^{93}\) SDEB10, SDEB10.1 and SDEB45.  
\(^{94}\) SDEB9 paragraph 2.11.
The Council’s response to PQ19 suggests a change to paragraph 16.127 to delete reference to iPort, Rossington. This is because that site is not an employment policy area, but rather an employment allocation with planning permission included in table E4 and subject to policy 4.

The Council’s response to PQ19 suggests a change to paragraph 16.158 to delete reference to a site in Askern which is an employment allocation with planning permission included in table E4 and subject to policy 4, and to accurately describe each of the employment policy areas in Askern.

**Q8.1.** Is policy 5 relating to employment policy areas defined on the Policies Map justified and consistent with national policy? Are the Council’s suggested changes to paragraphs 16.127 and 16.158 necessary to make the Plan sound?

**Employment allocations with planning permission**

Employment allocations with planning permission are listed in tables E1 to E8 in chapter 16 of the Plan. Paragraph 4.61 states that in total, 201 hectares are expected to be developed in the Plan period. However, two of the allocations (Unity and Askern Saw Mill) have additional capacity of around 35 hectares which could be developed before 2035. There are also a further 5 hectares on six small sites with planning permission for employment uses that are not allocated in the Plan.

Whilst policy 4 is entitled “employment allocations”, it only relates to the sites listed in Table 4 (which are six sites that did not have planning permission in 2018). There is not a policy in the Plan that relates to other employment allocations.

**Q8.2.** Are each of the employment allocations with planning permission listed in Tables E1 to E8 likely to be developed during the Plan period as assumed in the Plan?

**Q8.3.** Should the Plan include a policy to make clear how a decision maker should react to development proposals that may come forward during the Plan period on employment allocations that had planning permission in 2018?

**Employment allocations without planning permission**

Table 4 in the Plan lists six employment allocations that did not have planning permission in 2018. For each, figures are provided for gross site area; area available for employment uses (total 201 hectares); and the amount of hectares expected to be developed in the Plan period (total 164 hectares). The Plan does not contain policies to prevent the 37 hectares of land available for employment uses that is not expected to be developed until after 2035 to come forward earlier.

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95 SDEB9 paragraph 2.10.
96 SDEB9 paragraph 2.8.
Policy 4 states that only B1b/c (research and development, and light industry); B2 (general industry) and B8 (storage and distribution) uses will be permitted on the six employment allocations without planning permission.

Q8.4. Are each of the employment allocations without planning permission listed in Table 4 suitably located and likely to be developed during the Plan period as assumed in the Plan?

- Thorne North, M18 junction 6 (001)
- RHADS site 1, Phase 4 Business Park (941)
- Carcroft Common (441)
- Bankwood Lane, Rossington (1032)
- Balby Carr (092)
- Middle Bank, Balby (258)

**Overall employment land supply**

Q8.5. Collectively, will the employment allocations and employment policy areas be sufficient to meet anticipated development needs over the Plan period and provide enough flexibility to accommodate needs not anticipated?

**Offices**

The need for additional office floorspace in the Borough was considered under matter 2. Paragraph 4.63 in the Plan advises that as B1a offices are main town centres uses they must satisfy the requirements set out in policy 23 (including a sequential approach) although in some cases (such as airport related offices and ancillary offices) they may be appropriately located on employment sites. This approach is reflected in the table in policy 3 and in various policies in the Plan relating to specific sites including policies 7 (Doncaster Sheffield Airport), 68 and 69 (Doncaster town centre), and 71 (Mexborough town centre).

Q8.6. Does the Plan identify sufficient opportunities to ensure that the identified need for additional office floorspace can be accommodated over the Plan period?

**Requirements and standards relating to economic development**

Appendix 2 of the Plan sets out development requirements for three employment allocations that did not have planning permission in 2018:

- Thorne North, M18 junction 6 (001)
- RHADS site 1, Phase 4 Business Park (941)
- Carcroft Common (441)

Q8.7. Are the site specific requirements for employment allocations set out in Appendix 2 justified? Is there sufficient detail in the Plan to provide clarity to developers, local communities and other interested parties about the nature and scale of development proposed on all employment allocations? 

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97 This site is called “Site 2, east of Poplars Farm, Hurst Lane, Auckley” in Appendix 2.
98 PPG ID:61-002-20190315
Policy 47 sets out requirements for all non-residential, commercial and employment developments aimed at achieving high quality design.

Q8.8. Are the design requirements for all non-residential, commercial and employment development set out in policy 47 justified?

Policy 27 aims to protect, improve, and create new green infrastructure and includes particular requirements for developers to provide green infrastructure masterplans. The Council has suggested a change so that the requirement would apply to non residential development on sites of one hectare or more.

Q8.9. Is the Council’s suggested change to policy 27 part A requiring all non residential development on sites of one hectare or more to provide green infrastructure masterplans necessary to make the Plan sound and is it justified?

Policy 55 sets out requirements relating to development that may cause or be affected by pollution. Part B deals specifically with noise pollution, and paragraph 13.20 states that guidance in the “accompanying Noise Annex” will be applied. The Council has suggested a minor amendment to clarify that the “Annex” is Appendix 11 in the Plan. This sets out specific thresholds, and states that they will be applied to determine the acceptability of proposals. The Council’s response to PQ44 suggests that the second sentence of policy 55 part B be changed to make clear that when noise assessments are submitted with planning applications they should have regard to the thresholds set out in Appendix 11.

Q8.10. Are the requirements in policy 55 for mitigation measures relating to noise, air quality, water and artificial lighting justified in so far as they relate to employment development? In particular, are the noise standards in appendix 11 justified, and is the change suggested by the Council needed to ensure that the Plan is clear about how they are intended to be taken into account by decision makers?

Policy 4 part C states that the Council will seek to enter into a local labour agreement with developers of schemes that propose 20 or more direct jobs. The Council’s response to PQ37 advises that the policy will be supported by a Supplementary Planning Document and will be implemented using section 106 agreements (planning obligations) where they meet the relevant statutory tests.

Q8.11. Is the suggestion in policy 4 part C that for developments that propose 20 or more direct jobs the Council will seek to enter into local labour agreements with the developer/applicant compliant with relevant legal requirements and national policy?

Rural economic development

Policy 26 part 1 support the re-use and conversion of buildings in the Countryside, including for non-residential uses, provided that certain criteria are satisfied.

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99 CSD5.
100 CSD6.
met. Part 4 supports non-residential development in the Countryside provided that the rural location of the enterprise is justifiable to support a prosperous rural economy. Economic development in the Green Belt would be subject to policy 2 part 6.

Q8.12. Would policy 26 parts 1 and 4 be effective in enabling the sustainable growth and expansion of all types of business in rural areas through the conversion of existing buildings and well-designed new buildings?

M9. Town centres and retail

The quantitative and qualitative need for retail and leisure developments was considered under matter 2. This matter is concerned with how the Plan proposes to meet those needs. The Council’s Topic Paper 5: Retail aims to explain the approach taken in the Plan.

Local plans should allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Where suitable and viable town centre sites are not available for main town centre uses, plans should allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre.

Locating main town centre uses

Policy 23 states that retail, leisure and other main town centre uses will be located according to the network of sub-regional, town, district and local centres defined by policies 2 and 3. The network is set out in table 2 and designated on the Policies Map. Policy 23 goes on to set out policies relating to a sequential approach, impact assessments, and out of centre locations including retail parks.

Q9.1. Is the approach to locating town centre uses set out in policy 23 consistent with national policy or otherwise justified? In particular:

a) Does the Plan contain a clear definition of “town centre uses”?

b) The definitions in part 1 of “edge of centre” for retail, office and other main town centres in relation to Doncaster, Mexborough, Thorne and other town centres.

c) The requirement in part 1 for “bulky goods floorspace” proposals to assess the availability, suitability and viability of premises in out of centre and retail parks.

d) The thresholds in part 2 for impact assessments for retail and other main town centre uses in relation to Doncaster and other town centres.

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101 DMBC5.
102 NPPF 85.
103 Policy 23 states that “town centre uses” include retail, leisure, office, cultural and tourist developments. Paragraph 8.1 refers also to “commercial” and “entertainment” facilities. Policy 24 part 1 provides a definition of the types of “main town centre uses” that are supported in Primary Shopping Areas (ie use classes A1 to A5 and “other uses to which pedestrians may be expected to visit in the course of a shopping, leisure, entertainment, or tourist trip”) and part 2 refers to a “wider range of town centre uses such as restaurants, pubs, hotels, cinemas, and financial and professional services”. The NPPF Glossary includes a definition of “main town centre uses”.

Doncaster Local Plan Examination - IN No. 4 – Matters, Issues and Questions, June 2020
e) The support in principle in part 3 for certain main town centre uses (but not others) in out of centre locations subject to meeting the criteria set out in parts 1 and 2.
f) The proposed use of planning conditions set out in part 3.

Development within town centres

Local plans should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. They should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, and allow a suitable mix of uses (including housing).

Q9.2. Is the approach to development within Doncaster, Mexborough, Thorne and other town centres set out in parts 1 and 2 of policy 24 consistent with national policy or otherwise justified? In particular:

a) The approaches in part 1 to development at ground floor level and above in the Primary Shopping Areas of Doncaster, Mexborough and Thorne town centres.
b) The resistance to “non-town centre uses” (including housing?) in part 2.

Doncaster sub regional centre

Policies 68 and 69 set out spatially specific proposals for different parts of Doncaster town centre, including a number of specific development sites. The Council has proposed a main modification to policy 69 part 5 to clarify that a new footbridge over the river Don is subject to feasibility.

Q9.3. Are the proposals for Doncaster town centre set out in policies 68 and 69 justified? Do they set out an effective and positive approach to the growth, management and adaptation of the centre that reflects its distinctive character? Is the Council’s suggested modification to policy 69 part 5 necessary to make the Plan sound?

Policy 15 states that car parks in Doncaster town centre will be managed in favour of short stay parking with supply aligned to meet operational demand and sets out criteria that proposals for off street parking must comply with.

Q9.4. Is the approach to car parking in Doncaster town centre set out in policy 15 justified and consistent with national policy?

Mexborough town centre

Policy 71 states that Mexborough town centre will be extended and enhanced whilst its historic character will be preserved and enhanced through high quality infill development, and goes on to set out a number of specific objectives, opportunities and requirements.

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104 NPPF 85(f).
105 CSDS.
106 NPPF 106.
Q9.5. Are the proposals for Mexborough town centre set out in policy 71 justified? Do they represent an effective and positive approach to the growth, management and adaptation of the centre that reflects its distinctive character?

**Thorne town centre**

Policy 72 sets out various requirements that developments in Thorne town centre are expected to meet where relevant.

Q9.6. Are the proposals for Thorne town centre set out in policy 72 justified? Do they represent an effective and positive approach to the growth, management and adaptation of the centre that reflects its distinctive character?

**Meeting identified needs for main town centres in the Borough**

Q9.7. Overall, does the Plan identify sufficient opportunities to ensure that anticipated needs for retail, leisure and other main town centre uses over the next ten years will not be compromised by limited site availability\(^\text{107}\)?

**Betting shops, pay day loan units and pawnbrokers**

Policy 24 part 3 only supports proposals to change the use of a building to a betting shop, pay day loan unit or a pawnbroker if three criteria are met, in addition to the requirements of parts 1 and 2. Paragraph 8.23 explains that this is to maintain the vitality and viability of town centres, and to protect population health, amenity and safety. *Topic Paper 5: Retail* provides the Council’s justification\(^\text{108}\).

Q9.8. Is the restrictive approach in policy 24 part 3 to proposals for betting shops, pay day loan units and pawnbrokers consistent with national policy or otherwise justified? In particular:
   a) Is it consistent with national policy that encourages plans to take a positive approach to accommodating all types of town centre uses?
   b) What evidence is there that restricting the number and/or clustering of such uses would help to maintain the vitality and viability of town centres in the Borough?
   c) What evidence is there that restricting the number and/or clustering of such uses would protect population health, amenity and safety?
   d) What is the justification for only allowing such uses in vacant properties which have been marketed unsuccessfully for at least one year?
   e) As part A requires the property to be vacant, wouldn’t part B always be satisfied? If not, how would a decision maker determine if a proposal would generate footfall within the shopping frontage?
   f) Is part C relating to over concentrations of such uses intended to be assessed in terms of each of the three uses separately or all three collectively? If the latter, what is the justification? In either case, how would a decision maker determine if a proposal would result in an over concentration in an area?

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\(^{107}\) NPPF 85(d).

\(^{108}\) DMBC5 paragraphs 48 to 57.
g) Is the policy intended to only apply to development within town, district and local centres? If so, would it be likely to lead to such uses locating elsewhere in the Borough?

Food and drink uses

Policy 25 relates to food and drink uses “such as restaurants, cafes, pubs, bars, hot food takeaways and fast food outlets”. Policy 51 aims to improve and promote strong, vibrant and healthy communities including through controlling the location of, and access to, “unhealthy eating outlets”. Topic Paper 5: Retail provides the Council’s justification.

Q9.8. Are the approaches to food and drink uses set out in policies 25 and 51 justified and consistent with national policy, and are they likely to be effective? In particular:
   a) Are the meanings of “fast food outlet” in policy 25 and “unhealthy eating outlet” in policy 51 clear?
   b) How would a decision maker assess whether a proposal would lead to clustering or proliferation of food and drink uses where they undermine objectives to promote healthy living and the vitality and viability of a town centre as referred to in policy 25 part C?
   c) The restrictions in the last part of policy 25 relating to hot food takeaways and “fast food outlets” which are located within 400 metres of a school, sixth form college, community centre or playground.
   d) How would policy 51 part E be implemented in terms of controlling the location of, and access to, “unhealthy eating outlets”?

M10. Doncaster Sheffield Airport

Policy 7 supports growth and investment at Doncaster Sheffield Airport to enable its development and expansion in line with some specified principles.

The Council’s response to FPQ1 suggests changes to policy 7, the reasoned justification and Appendix 3 along with changes to the Policies Map to clarify the geographical areas to which the various parts of the policy are intended to apply. The questions below assume that those changes would be made.

Airport, aviation related, and employment developments

Q10.1. Is the support in policy 7 for growth and investment at Doncaster Sheffield Airport to enable its development and expansion justified and consistent with national policy (subject to the Council’s suggested changes to clarify the geographic areas that the various parts of the policy apply to)? In particular:
   a) The broad support for the ambitions set out in the airport’s Growth Plan

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109 DMBC5 paragraphs 48 to 50 and 58 to 72.
110 INSP2.1.
111 Aviation Policy Framework (2013) [OTH52] and NPPF.
112 Plan paragraph 5.7.
113 Masterplan 2018-2037 Draft Consultation Report [OTH53].
b) The support in part A for aviation uses and infrastructure required for the safe operation and growth of the operational passenger and freight airport uses in the operational area.

c) The support in part B for aviation related development within the airport operational area.

d) The airside employment and operational uses proposed in part C for site 517.

e) The employment uses supported on allocated sites 748 and 941.

f) The support in part E for further employment development in employment policy areas within the airport policy area.

g) The support in part H for aviation heritage and training at land north of Hayfield Lane in the airport operational area as shown as “community facilities: Vulcan hangar and training centre” on the Policies Map.

Housing-led mixed use urban extension

The Plan aims to facilitate the delivery of 18,400 new homes in the period 2015 to 2035. The Council’s response to PQ27 advises that the Plan identifies opportunities to deliver at least 23,791 new homes in that period to achieve that aim.

In addition to those opportunities, policy 7 allocates two sites for the development of 1,200 new homes to the west of the airport. 11 hectares is proposed for up to 280 dwellings to support initial phases of airport expansion (site 940 E2). An additional area of approximately 70 hectares is proposed for up to 920 houses subject to airport-related job growth (site 940 E3). Appendix 3 clarifies how job growth and the associated number of homes will be calculated. This suggests that nearly 11,000 jobs would have to be created at or clearly related to the airport for all of the 1,200 new homes to be permitted.

Paragraph 5.4 of the Plan states that the airport is an economic priority both for Doncaster and Sheffield City Region and it will play a key role in driving the local and regional economy. The strategic aim of delivering 18,400 new homes is to meet local housing need and to allow enough people to move to the Borough to support its and the Sheffield City Region’s economic growth ambitions. Despite this, the Council’s response to PQ27 confirms that any completions at the airport would not be counted towards achieving the aim of delivering 18,400 new homes in the Plan period.

Q10.2. Is the identification of 105.5 hectares for a housing-led mixed use urban extension on land to the south west of Hayfield Green and the approach to its release set out in policy 7 parts F and G justified and will it be effective in achieving sustainable development? In particular:

a) 10 hectares (site 940 E1) for a central area of retail, food and drink, hotel and other commercial and community uses.

b) 11 hectares (site 940 E2) for up to 280 dwellings to support initial phases of airport expansion and employment growth.

c) An additional area of approximately 70 hectares (site 940 E3) for a reserve site for up to 920 houses conditional strictly tied to the delivery of jobs (on

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114 Paragraphs 4.37 and 4.38 of the Plan and SDEB44 paragraph 2.20 to 2.40.
the airport site or elsewhere in the Borough if specifically and clearly related to the airport) as set out in part G and Appendix 3.

d) Should any housing completions on allocated sites 940 E2 and E3 be counted towards achieving the strategic aim of delivering 18,400 new homes in the Plan period?

Access to and car parking serving the airport

Q10.3. Is the approach in policy 7 part I to the provision of additional car parking at the airport, and the presumption against off-site car parking, justified and will it be effective in helping to promote sustainable transport?

Q10.4. Is the support in policy 7 part J.2 (and policy 13 part A.9) for road access from the M18 to the airport justified and consistent with national policy?

Q10.5. Is the support in policy 7 part J.1 (and policy 13 part B.1) for a new railway station at the airport and electrified main line rail connection to the East Coast Main Line (as indicated on the key diagram) justified and consistent with national policy?

Masterplanning and development requirements

Q10.6. Are the requirements in policy 7 relating to a comprehensive airport-wide masterplan exercise (part K); specific development guidelines about safeguarding areas (part L.1) and a strategic delivery plan (part L.2); and green infrastructure (part M) justified and consistent with national policy?

M11. Unity Regeneration Project

The Unity regeneration project proposed in policy 70 involves major mixed use development of an extensive area to the west of M18 junction 5 between Hatfield and Stainforth. Outline planning permission, which included a masterplan (Figure 17 in the Plan), and associated planning obligations are in place. Implementation is expected to take place over around 30 years, with a total of 3,100 new homes and 56 hectares of employment uses eventually being delivered.

The Council has suggested a change to delete part D.4 of policy 70 (which refers to leisure and other uses being supported at the former Hatfield colliery where they lead to the long term conservation of the grade II listed headstocks) and the insertion of a new part G to refer to the conservation of the headstocks being addressed through detailed master planning115.

Q11.1. Is the proposal in policy 70 for a mixed use development between Hatfield and Stainforth as shown on the Policies Map and “inset map” justified and is it likely to be developed in the timescales envisaged during and after the Plan period? In particular:

115 CSD5.
a) The specific developments (including 1,015 dwellings and 33.6 hectares of employment land during the Plan period) and infrastructure set out in part A and indicated on Figure 17 ("Unity Masterplan: approved outline planning application ref 15/01300/OUTA").
b) The potential uses on the former Hatfield colliery site set out in part D.
c) Is the deletion of part D.4 and insertion of new part G relating to the grade II listed headstocks necessary to make the Plan sound?
d) The relocation of existing gypsy and traveller sites from north of Station Road, Dunsbrook to an appropriate site of similar size, proportion and equivalent standard as proposed in part E.

**M12. Transport and Access**

National policy aims to promote sustainable transport and advises that strategic policies should make sufficient provision for transport infrastructure\(^\text{116}\).

*Proposed road improvements*

Policy 13 part A supports proposals to improve key routes and connections and effectively manage traffic and relieve congestion and lists eleven specific routes. Table 7 provides information about those “major road network enhancement priorities”. Indicative routes of the following are shown on the Key Diagram:

- North Doncaster A1-A19 link
- Dearne Valley to A1(M) improvements (Hickleton and Marr bypasses)
- A19-M18 connectivity
- Hatfield link road
- West Moor link (A630)
- North Nottinghamshire to A631 capacity improvements

The Council’s response to PQ38 suggests that it is not the intention that the Plan protects or safeguards routes for any of the schemes listed in policy 13 part A. The Council advise that the purpose of policy 13 part A is to identify priorities for improvements to key routes. The Council’s response to PQ39 advises that none of the schemes are specifically to address highway safety but two are essential to facilitate development proposed in the Plan:

- Hatfield link road (under construction and due to open in summer 2020).
- West Moor link (A630 west of M18 junction 4).

**Q12.1.** Is the support for each of the eleven road improvements listed in policy 13 part A and Table 7 (“major road network enhancement priorities”) and indicated on the Key Diagram (“transport proposals”) and Figure 6 (“proposed infrastructure”) justified and consistent with national policy? In particular:

a) Do these elements of the Plan serve a clear purpose, and is it evident how a decision maker should react to a proposal to deliver one of the schemes or, alternatively, react to a development proposal that could compromise the delivery of one of the schemes?

b) Are the schemes based on robust transport evidence in accordance with national policy and guidance\(^\text{117}\)?

\(^{116}\text{NPPF 20(b) and section 9.}\)

\(^{117}\text{PPG ID:54 (2015) and PPG ID:61-034 and 61-059-20190315.}\)
c) Were reasonable alternatives to the schemes considered during the preparation of the Plan including through the sustainability appraisal?
d) Have the environmental impacts of the schemes been identified, assessed and taken into account\(^{118}\)?
e) Is there a reasonable prospect that each of the schemes will be delivered during the Plan period?

**A1(M) and M18 junctions**

The Council’s evidence indicates that most of the A1(M) and M18 junctions in the Borough will be operating over capacity in 2035, with or without the development proposed in the Plan. For the majority of the junctions, the development proposed will result in additional queuing and delay. Potential improvement works have been identified for those junctions that could mitigate those additional impacts\(^{119}\).

**Q12.2. Is it necessary to modify the Plan for it to set out requirements for any allocated sites to secure or contribute towards improvements to A1(M) or M18 junctions?**

**Proposed rail and bus transport improvements**

Policy 13 parts B and C support improvements to bus and rail transport, some of which could involve a significant amount of development including:

- New, expanded or re-opened lines and stations and rail links to outlying towns and communities where feasible, such as Askern.
- Upgrading of the East Coast Main Line and Trans Pennine Links.
- New high-speed rail opportunities in association with new and expanded interchanges.
- Tram train network to serve the Borough.
- Additional and/or improved park and ride facilities.

**Q12.3. Is the support for each of the rail and bus improvements listed in policy 13 parts B and C justified and consistent with national policy? In particular:**

a) Do these elements of the Plan serve a clear purpose, and is it evident how a decision maker should react to a proposal to deliver one of the improvements or, alternatively, react to a development proposal that could compromise the delivery of one?
b) Are the improvements based on robust transport evidence in accordance with national policy and guidance?
c) Are the improvements needed to facilitate development proposed in the Plan?
d) Have the environmental impacts of the improvements been identified, assessed and taken into account?
e) Is there a reasonable prospect that each of the improvements will be delivered during the Plan period?

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\(^{118}\) NPPF 102(d).
\(^{119}\) Technical Memorandum 19 December 2019 [SDEB51].
**Freight transport and lorry parking**

Policy 13 part D aims to improve the efficiency of freight transport and provide opportunities for alternatives to road transport where possible. Policy 16 requires certain forms of development to provide lorry parking facilities on or off-site, and supports proposals for lorry parking facilities provided a number of criteria are met.

Q12.4. Is the approach to freight transport and lorry parking set out in policies 13 part D and 16 justified and consistent with national policy, and will it be effective in improving the efficiency of transport and encouraging alternatives to the use of roads?

**Promoting sustainable transport in new development**

Policy 14 expects all new development to make appropriate provision for access by sustainable modes of transport and sets out a number of particular requirements.

Q12.5. Are the requirements of policy 14 justified and consistent with national policy and guidance\(^{120}\)? In particular:

a) The parking standards for cars, disabled motorists, electric vehicles and motorcycles for different types of development in appendix 6.

b) The thresholds for transport statements, transport assessments, and travel plans in appendix 7.

**Cycling and walking**

The Council has suggested a change to policy 17 part C.3 to require employment developments to provide changing and showering facilities\(^{121}\).

Q12.6. Are policies 17 to 21, and the cycle parking standards in appendix 6, justified and will they be effective in providing high quality walking and cycling networks and supporting facilities?\(^ {122}\) In particular:

a) Is the Council’s suggested change to policy 17 part C.3 necessary to make the Plan sound, and is it justified?

b) Is the requirement in policy 19 part D for unrecorded public paths that cross development sites to be treated in the same way as definitive rights of way justified?

c) Are the specific requirements in policy 20 parts B and C relating to the access, design and layout of public rights of way on development sites justified?

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\(^{120}\) NPPF 105, 106 and 111 and PPG ID-42 (2014).

\(^{121}\) CSDS.

\(^{122}\) NPPF 104d.
M13. Natural and Built Environment

Protecting open space and local green space

Policy 27 (green infrastructure) and policy 29 (open space provision in new developments) are considered under matter 6 (housing development requirements).

Policy 28 protects open spaces, including Local Green Space\textsuperscript{123}, identified on the policies map and non-designated open spaces.

The Council has suggested changes to the first part of policy 28 so that it refers to “open space policy areas”, and to include an additional criteria in part B to protect non-designated open space that contributes to the character of a conservation area or the setting of a designated heritage asset\textsuperscript{124}.

The Council’s response to PQ41 clarifies the three areas that are designated on the Policies Map as Local Green Space and summarises the justification for protecting them. A change is suggested to list the sites in paragraph 10.17. A change is also proposed to the Policies Map to correct the boundary to the Local Green Space in Campsall.

<table>
<thead>
<tr>
<th>Q13.1. Is policy 28 justified and consistent with national policy and will it be effective in ensuring access to high quality open spaces and opportunities for sport and physical activity\textsuperscript{125}? In particular:</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) The approach to open spaces defined on the Policies Map and open space policy areas in parts A and D.</td>
</tr>
<tr>
<td>b) The approach to non-designated open spaces in part B, and the Council’s suggested changes relating to conservation areas and the setting of designated heritage assets.</td>
</tr>
<tr>
<td>c) The Local Green Spaces defined on the Policies Map and the Council’s suggested change to list them in paragraph 10.17.</td>
</tr>
</tbody>
</table>

Biodiversity and geodiversity

Policies 30, 31 and 32 deal with ecological networks, biodiversity, geodiversity and local wildlife and geological sites, including those designated on the Policies Map. Appendix 8 contains the site selection guidelines that were used to designate the sites on the Policies Map and would also be used to consider whether non-designated sites that may be affected by development should be protected.

The Council has suggested changes to policy 31 part C relating to sites of special scientific interest and to the reasoned justification relating to the mitigation hierarchy\textsuperscript{126}.

\textsuperscript{123} NPPF 99 to 101.  
\textsuperscript{124} CSD5 and response to PQ40.  
\textsuperscript{125} NPPF 171, 96 and 97.  
\textsuperscript{126} CSD5.
Q13.2. Are policies 30, 31 and 32 consistent with national policy and will they be effective in protecting and enhancing biodiversity and geodiversity? In particular:

a) The requirement in policy 30 for all proposals to deliver a net gain for biodiversity and protect, create, maintain and enhance the Borough’s ecological networks.

b) The approach in policy 31 to internationally and nationally important habitats, sites and species.

c) The approach in policy 31 part A, policy 32 and Appendix 8 to protecting local wildlife and geological sites and features.

d) Are the Council’s suggested changes to policy 31 part C and paragraph 10.40 necessary to make the Plan sound?

e) What is the purpose of policy 32?

Woodland, trees and hedgerows

Q13.3. Are the requirements of policy 33, relating to woodlands, trees and hedgerows, justified and consistent with national policy?

Landscape

The Council has suggested a change to policy 34 to refer to cumulative impact.127

Q13.4. Are the requirements of policy 34, relating to landscape character and landscape features, justified and consistent with national policy? Is the Council’s suggested change necessary to make the Plan sound?

Historic environment

Policy 35 supports proposals which preserve or, where appropriate, enhance the heritage significance and setting of the Borough’s heritage assets and policy 36 sets out requirements for heritage statements and other information to support proposals that affect heritage assets. Policies 37 to 40 deal with particular types of designated heritage assets and archaeology.

Appendix 9 sets out the criteria that were used to select the 26 parks and gardens of local historic interest identified in the Plan and subject to policy 39.

Policy 41 sets out criteria for proposals that affect non designated buildings and structures that are of local historical interest that will be identified by the Council using the criteria set out in Appendix 10. The Council has suggested changes to Appendix 10 and paragraph 11.40 to make clear that the criteria are no longer “draft”.

Q13.5. Are policies 35 to 41 and appendices 9 and 10 consistent with national policy?128 Along with particular requirements relating to specific sites, do they set out an effective and positive strategy for the conservation and enjoyment of the Borough’s historic environment?

127 CSDS.
128 NPPF section 16.
Design and the built environment

Policies 42 to 49 were considered under matter 6 in relation to residential development and matter 8 in relation to non-residential development.

Agricultural land and soil and water resources

The Council’s response to PQ46 suggests the deletion of part A.1 of policy 61 which required proposals that involve the significant loss of best and most versatile agricultural land to demonstrate an overriding need for the development\(^\text{129}\).

The Council has also suggested that policy 61 be changed to include an additional criteria to refer to the Water Framework Directive and promoting water efficiency\(^\text{130}\).

Q13.6. Are the Council’s suggested changes to policy 61 necessary to make the Plan sound and would they be effective in so doing?

M14. Other environment issues

Pollution

Policy 55 was considered under matters 6 and 8 in so far as it applies to residential and economic development respectively.

The Council has suggested that policy 55 and reasoned justification be changed\(^\text{131}\):
- Opening paragraph of policy 55 to refer to the “agent of change principle”.
- Part D to refer to contamination to Source Protection Zones along with additional reasoned justification.
- Additional reasoned justification about artificial lighting and bats.

Q14.1. Are the Council’s suggested changes to policy 55 and reasoned justification necessary to make the Plan sound and would they be effective in so doing?

Contamination and unstable land

The Council has suggested a change to include additional reasoned justification for policy 56 referring to site investigation information\(^\text{132}\).

Q14.2. Will policy 56 be effective in ensuring that development proposals include appropriate mitigation to deal with contamination and unstable land? Is

\(^{129}\) NPPF 170(b) and footnote 53.
\(^{130}\) CSD5.
\(^{131}\) CSD5 and response to PQ44.
\(^{132}\) CSD5.
the Council’s suggested change to paragraph 13.22 necessary to make the Plan sound?

Food risk and drainage

The way in which flood risk was taken into account in deciding the spatial strategy and selecting site allocations was considered under matter 1.

Policies 57 and 58 set out development management requirements relating to drainage and flood risk management. The sixth paragraph of policy 2 refers to development being accommodated in flood zones where sites are safe or can be made safe. The Council’s response to PQ13 suggests a change to this to make clear that development in flood zones will need to be in accordance with policy 58 and national policy. The Council’s response to PQ14 suggests removing this paragraph, along with 7 other paragraphs, from policy 2 and setting them out in a separate text box entitled “spatial strategy”.

The Council’s response to PQ12 explains why policy 58 part C confines the sequential test area of search for housing, business and industrial development on windfall sites to the settlement in question, rather than a wider area or the Borough as a whole. The response proposes a change to the policy so that it applies only to tiers 1 to 3 of the settlement hierarchy defined in policy 3.

Q14.3. Is the Council’s suggested change to the sixth paragraph of policy 2 (or “spatial strategy” box) necessary and would it make this part of the Plan sound?

Q14.4. Are policies 57 and 58 consistent with national policy and would they be effective in ensuring that development is safe from the risk of flooding and would not increase flood risk elsewhere? Is the approach to windfall sites in areas of flood risk set out in policy 58 part C consistent with national policy or otherwise justified? Is the Council’s suggested change necessary and would it make the policy sound?

Low carbon and renewable energy

Policy 59 aims to increase the supply of low carbon and renewable energy produced in the Borough by identifying various types of scheme that will be supported. Part B sets out requirements that all schemes would be expected to meet.

Policy 60 identifies parts of the Borough to which medium to large (over 55 metres hub height) and small to medium scale wind energy schemes will be directed, and sets out additional criteria that such forms of development would have to comply with. The area of search for medium to large wind energy developments is shown on the Policies Map and Figure 13 and comprises the flood plain of the River Don to the north east of Doncaster.

The Council’s response to PQ45 states that it is commissioning an update to the landscape assessment that helped to inform the selection of the area of search for wind energy development. The update will focus on specific parts of the Borough, including where wind energy developments have taken place since
2006. The Council currently estimates that this update is likely to available late July / early August.

The Council has suggested a change to part A of policy 59 to include community energy schemes in the list of priorities that will be supported\textsuperscript{133}.

\begin{center}
\begin{tabular}{|c|}
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Q14. Do policies 59 and 60 set out a justified and positive strategy that will be effective in helping to increase the supply of renewable and low carbon energy that maximises the potential for suitable development whilst ensuring that adverse impacts are addressed satisfactorily\textsuperscript{134}? In particular:
\begin{itemize}
\item[a)] The priorities set out in policy 59 part A (subject to the Council’s suggested change to refer to community energy schemes).
\item[b)] The requirements of policy 59 part B.1 for all proposals to undertake community engagement and demonstrate how they will deliver environmental, social and economic benefits.
\item[c)] The Area of Search for Wind Energy Developments defined on Figure 13 and the Policies Map.
\item[d)] The requirements of policy 60 parts D to J for all wind energy developments.
\end{itemize}
\hline
\end{tabular}
\end{center}

\textbf{M15. Minerals}

Doncaster produces aggregate, industrial, and energy minerals that contribute towards meeting local, regional and national needs. The two main aggregate minerals currently extracted in the Borough are limestone and sand and gravel. Clay is sometimes worked alongside sand and gravel, and industrial limestone is also extracted. A limited amount of building stone is produced. Gas is stored underground at former hydrocarbon reservoirs at Hatfield and Trumfleet. There are significant deep coal reserves which are not currently worked.

The provision of adequate mineral resources is one of the Council’s strategic priorities, and the approach to meeting the need for aggregate minerals in Yorkshire and Humber and the East Midlands was one of the main matters addressed through the duty to cooperate\textsuperscript{135}.

Policies 62 to 65 set out the approach to extraction, production and safeguarding of mineral resources; safeguarding minerals infrastructure; and the reclamation of mineral sites. The Council’s main evidence is set out in submitted documents reference SDEB29 to SDEB34.

\textit{Supply of minerals}

Policy 62 supports the extraction and production of aggregate, industrial, building stone and energy minerals.

Table 10 sets out the quantities of crushed limestone and sand and gravel that the Council expects to be extracted in the Borough in the period to 2035. The Council has suggested changes to Table 10 and associated paragraphs. It

\textsuperscript{133} CSD5.
\textsuperscript{134} NPPF 151(a).
\textsuperscript{135} Council response to PQ1.
advise that these are to add clarity, and that no changes are suggested to the numbers/calculations\textsuperscript{136}.

Q15.1. Are the quantities of sand and gravel, and limestone (crushed rock), that Doncaster can supply during the Plan period set out in Table 10 justified and consistent with the requirements of national policy? Are the Council’s suggested changes to Table 10 and paragraphs 14.45 to 14.49 necessary to make the Plan sound, and would they be effective in so doing?

Q15.2. Are the existing mineral sites with planning permission; new mineral allocations/preferred areas; and areas of search for minerals referred to in policy 62 part A.6, listed in Tables 11 to 13, and defined on the Policies Map justified? Will they be effective in ensuring a steady and adequate supply of aggregates and industrial minerals\textsuperscript{137}?

Q15.3. Is the requirement in policy 62 part A.5 for proposals for sand and gravel extraction to demonstrate that the mineral resource includes at least 20% sharp sand and gravel justified?

\textit{Safeguarding mineral resources}

Policy 62 part B sets out a number of requirements that non-mineral development (other than the exemptions listed in paragraph 14.55) would need to meet if proposed within the mineral safeguarding areas listed in Table 15 and designated on the Policies Map (or within a 250 metre buffer zone where relevant). Paragraph 14.55 explains that this is to prevent the sterilisation of shallow coal, crushed rock aggregate, sand and gravel, and industrial limestone resources during and beyond the Plan period.

Q15.4. Are the mineral safeguarding areas listed in Table 15 (and shown on the Policies Map) and the requirements of policy 62 part B justified, and will they be effective in ensuring that known locations of specific mineral resources are not sterilised by non-mineral development where that can be avoided\textsuperscript{138}?

\textit{Safeguarding minerals infrastructure}

Table 14 lists nine sites that are used to handle, process and transport minerals and manufacture concrete products. Policy 62 part A.7 states that they will be safeguarded from non-minerals development, and paragraph 14.52 refers to a 250 buffer where appropriate.

Q15.5. Are the ancillary minerals infrastructure listed in Table 14 (and shown on the Policies Map) and requirements of policy 62 part A.7 justified, and will they be effective in safeguarding facilities for handling, processing and transporting minerals and substitute, recycled and secondary aggregates, and the manufacture of concrete and concrete products\textsuperscript{139}?

\textsuperscript{136}CSD5.
\textsuperscript{137}NPPF 207 and 208.
\textsuperscript{138}NPPF 204(c).
\textsuperscript{139}NPPF 204(e).
Minerals development requirements

Policy 63 supports all forms of minerals development provided that all impacts are addressed and appropriately mitigated in accordance with other policies in the Plan, national policy and planning practice guidance. Incidental mineral extraction and borrow pits (temporary mineral workings adjacent to a major construction site) are supported provided that a number of additional criteria are met.

Q15.6. Are the requirements for minerals development set out in policy 63 justified and consistent with national policy, and will they be effective in ensuring that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health, taking into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality\(^{140}\)?

Reclamation of minerals sites

Policy 64 sets out requirements for a phased sequence of extraction, restoration, reclamation and planned aftercare of mineral sites that specifically benefits climate change mitigation, biodiversity, green infrastructure, informal recreation, agriculture and/or geodiversity.

Q15.7. Are the requirements for the reclamation of mineral sites set out in policy 64 justified and consistent with national policy, and will they be effective in ensuring that worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high quality restoration and aftercare of mineral sites takes place\(^{141}\)?

Building stone

Policy 62 supports the extraction and production of building stone. Paragraph 14.51 states that the Council will support small scale building stone extraction as part of larger aggregate quarries, or relic quarries especially where the material is required to heritage projects. Further information is set out in paragraph 14.55, and three dormant or disused limestone quarries are safeguarded through inclusion in Table 15 and designation on the Policies Map.

Q15.8. Will the support expressed in the opening sentence of policy 62 and the approach described in paragraph 14.51 and 14.59 to the production of building stone be effective?

Energy minerals

Policy 65 states that applications for the exploration, appraisal and development (including production) of on-shore gas and oil in licenced areas will be determined in accordance with national policy, guidance and relevant policies in

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\(^{140}\) NPPF 204(f).
\(^{141}\) NPPF 204(h).
the Plan. Petroleum exploration and development licence areas and hydrocarbon
sites are identified on the Policies Map.

Q15. 9. Is policy 65 consistent with national policy\textsuperscript{142}, and will it be effective in
planning positively for on-shore oil and gas exploration and extraction?

M16. Other Issues

Glossary

Appendix 1 to the Plan includes definitions of various terms and abbreviations
used in the Plan. The Council has suggested changes to several of these to
ensure consistency with national policy or improve clarity, and to delete a
number of others which it does not consider necessary to retain\textsuperscript{143}.

Q16.1. Assuming that the changes suggested by the Council are made, are the
definitions in Appendix 1 to the Plan consistent with those in the NPPF and will
they provide sufficient clarity to ensure that all of the policies in the Plan can be
effectively applied?

Any other soundness issues

Q16.2. Are there any parts of the Plan that have not been addressed by the
questions set out above that are unsound?.

\textsuperscript{142} NPPF 209.
\textsuperscript{143} CSD5 and response to PQ47.