Regulation 22(1)(c) Statement of Consultation in support of The Doncaster Local Plan 2015-2035

1.0 Introduction

1.1 Purpose

1.1.1 This Consultation Statement sets out how the Council has involved residents and key stakeholders in preparing the Doncaster Local Plan 2015 to 2035 in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.1.2 This statement meets Regulation 22 (1)(c) and demonstrates that consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant Regulations and the adopted Statement of Community Involvement (SCI) (July 2015).

1.1.3 The SCI document sets out how the Council will consult and involve the public and statutory consultees in planning matters. Full details of the current adopted SCI can be viewed here: https://www.doncaster.gov.uk/services/planning/statement-of-community-involvement

1.2 Background

1.2.1 This Consultation Statement describes how the Council has undertaken community participation and stakeholder involvement in the production of the Local Plan, setting out how such efforts have shaped the Plan and the main issues raised by consultation/representations.

1.2.2 The Council began preparing a new Local Plan for the borough in September 2014. The new Local Plan will set out the strategic vision, objectives and spatial strategy for the Borough, as well as, the planning policies which will guide future development. The Plan will look ahead to 2035, and identify the main areas for sustainable development and growth. It establishes policies and guidance to ensure local development is built in accordance with the principles set out in the National Planning Policy Framework (NPPF).

1.2.3 The Local Plan will replace the adopted Core Strategy (2012) and the Saved Policies from the Unitary Development Plan (1998) that currently make up the development framework for the Borough. The Joint Doncaster, Barnsley & Rotherham Waste Development Plan Document (adopted 2012) will remain part of the development plan and is being reviewed via separate process outside of the Local Plan. Once adopted, the strategic policies in the Local Plan provides the local
strategic policy context for any Neighbourhood Plans to be prepared (or reviewed in the case of those that have already been ‘made’ and in general conformity with the Core Strategy).

1.2.4 The Council’s Proposed Submission Local Plan and supporting documents, including the Sustainability Appraisal, were published in accordance with Regulation 19 for a minimum six week consultation period lasting from Monday 12th August until 6pm Monday 30th September 2019. The Council consulted specific consultation and statutory bodies, local amenity and residents’ groups, businesses and individual residents. A variety of consultation techniques were used in accordance with the Statement of Community Involvement.

1.3 Structure of Statement

1.3.1 This statement of consultation comprises four sections:

- Section 1 is an introduction.
- Section 2 sets out the timeline which has been followed in preparing the Local Plan which is accordance with the up to date Local Development Scheme - https://www.doncaster.gov.uk/services/planning/local-plan
- Section 3 summarises the main issues raised during the course of the consultation carried out under Regulations 18/19 and how the comments received have been considered by the Council.
- Section 3 is supported by the two Appendices found at Section 4 detailing how consultation was undertaken, the responses received at Regulation 18 and 20 stages and includes how the comments have been taken into account by the Council.

  o Appendix 1 explains:

      · who was invited to make representations and how (Regulation 22 1)(c)(i) and (ii))

      · a summary of the main issues raised by those persons (Regulation 22 (1)(c)(iii)) in Plan/theme order and

      · how those issues have been addressed in the preparation of the Local Plan (Regulation 22 (1)(c)(iv)).

  o Appendix 2 explains:

      · how the Regulation 19 Local Plan consultation was undertaken and the number of representations made including a summary of the main issues (Regulation 22 (1)(c)(v) with a council response to the issues raised.
2.0 Plan Production Timeline

2.1 The creation of a new Local Plan requires a number of thorough and robust stages of consultation. This is to enable early and ongoing engagement with the local community, businesses and organisations to develop a comprehensive document, tailored to the needs of the borough in terms of strategy and the policies required.

2.2 The timetable below outlines the main consultation stages of the emerging Local Plan up until the Submission date of the 5th March 2020. All of the stages numbered 1 to 5 which involved consultation were identified by the Council as falling under the remit of Regulation 18 - Preparation of a local plan. As much of the supporting evidence base as possible was published at the earliest opportunity, even if this meant issuing documents prior to the consultation period commencing, to attempt to reduce the number of documents published alongside consultations when there is a limited period of time available (normally 4 or 6 weeks) for stakeholders to respond.

Key Local Plan Stages Undertaken

1: Identify issues and collect evidence – October 2014 – June 2015

The resolution to produce a new plan was taken by Full Council on 25th September 2014 as part of the decision to withdraw the Sites & Policies Development Plan Document. A new Local Development Scheme was drawn up setting out the timescales for the new plan’s preparation. The Council reviewed existing policies in line with the then relatively new national planning policy and guidance (NPPF 2012) and identified any current gaps in policies or evidence bases with the vast majority being identified as in need of review and update. Began undertaking research to inform the Local Plan as well as issuing a ‘call for sites’ in October 20141. A Statement of Community Involvement was consulted on prior to being adopted in July 2015.

2: Emerging Vision, Aims & Objectives & Issues & Options consultation – July - September 20152

The Council consulted on a draft vision for the future alongside a series of aims and objectives for how this vision could be realised by the end of the plan period (at that

1 https://www.doncaster.gov.uk/services/planning/call-for-sites-stage
point being 2032). At the same time, an Issues & Options consultation was undertaken which set out questions on the Borough’s key issues that needed to be addressed by the new local plan, followed by 3 strategic options for how we could plan for the borough’s future. A further 3 options were considered but dismissed as not being reasonable options. Consultation was open for an 8-week period from 13th July - 7th September 2015. This stage was supported by a Sustainability Appraisal Scoping Report (July 2015)³ and a Sustainability Appraisal of the Growth Options (July 2015) as well as the Issues & Options paper itself.

3: Site Selection Methodologies consultation – November - December 2015⁴

A 4 week consultation was undertaken on 2 separate methodologies. The first one dealt with how housing and employment (including mixed use) sites could be selected through the new local plan, with the second covering minerals sites. These set out how sites could be identified having regard to national planning policy in respect to Green Belt and Flood Risk, as well as the need for sites to be assessed in terms of availability, achievability and overall deliverability (including viability) and possible criteria to assess all reasonable options through a full Sustainability Appraisal process.

Officer’s commenced the Council’s formal approvals processes to seek approval to consult on the Draft Vision, Aims and Objectives and the Homes & Settlements paper. The consultation was considered at various meetings cumulating in a decision by Full Council on 1st March 2016 to approve for consultation⁵.

4: Revised Vision, Aims & Objectives and Homes & Settlements consultation – March - April 2016⁶

³ [https://www.doncaster.gov.uk/services/planning/sustainability-appraisal](https://www.doncaster.gov.uk/services/planning/sustainability-appraisal)


⁵ Full Council Report & Minutes available here: [https://doncaster.moderngov.co.uk/elListDocuments.aspx?CId=130&MId=2029](https://doncaster.moderngov.co.uk/elListDocuments.aspx?CId=130&MId=2029)

This stage sought views on the proposed number of new homes to plan for (920 per year) and how these houses could be distributed around the Borough’s most sustainable towns and villages. The approach reflected feedback from the Issues & Options stage as to how this could be done. It gave proposed numbers to individual settlements and identified an initial settlement hierarchy. At the same time, the council re-consulted on revisions to the vision, aims and objectives. Again this was to take into account comments on the original version published in 2015. A Sustainability Appraisal was undertaken to re-assess the advantages and disadvantages of the potential growth options and concentrating on the 3 most reasonable options previously identified. It also assessed the Homes & Settlements paper itself. The Scoping Report was also updated at this stage.

A period of delay with the local plan was then experienced. Firstly, in July 2016, it was announced that there were revised proposals for the route of HS2 in the Sheffield City Region compared to the previous recommended route and station at Meadowhall, Sheffield. The original route did not pass through the Borough of Doncaster, but the revisions now see the line passing through the west of Doncaster in very close proximity to the Main Towns of Mexborough (including through a housing development of circa 220 dwellings which was under construction at the time) and Conisbrough-Denaby before heading north to the east of Barnburgh-Harlington (Service Village). The route has been Safeguarded under Direction of the Secretary of State. A consultation was then scheduled to be undertaken in Summer 2017. However, in July 2017, the Council was in receipt of an Inspector’s decision in respect to an Appeal which cast doubt over the Council’s objectively assessed housing need figure. The decision was subsequently challenged through the High Court (December 2017).

5: Draft Policies & Proposed Sites consultation – September – October 2018

The consultation included over 70 draft planning policies, both strategic and detailed, covering the whole range of planning topics (with the exception of waste matters). Preferred sites for housing, employment and mineral sites were also consulted on which were identified in line with the methodologies and quantum/distribution as per previous rounds of consultation. A Sustainability Appraisal report was also published alongside a number of new and updated supporting evidence base documents, including Viability Testing, a methodology for

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7 https://www.doncaster.gov.uk/services/planning/local-plan-consultation
identification of Development Limits, Economic Forecasting & Housing Needs Assessment, and, Green Belt Review.

6: Plan amendments – Autumn 2018 – Spring 2019

The Council took on board comments received following the Draft Policies & Proposed Sites consultation which had elicited an all-time high level of responses with circa 1,200 separate individuals commenting. The bulk of these were comments from residents in respect to preferred sites identified in the consultation and primarily objecting which, where appropriate and possible, were taken into account. Further evidence base documents were updated (e.g. SA Report, Green Belt Review, Viability Testing) to improve the Local Plan ready for formal consultation and to address revision to NPPF and PPG that were published in 2018, but were not necessarily reflected in the previous consultation due to the timing of their publication and lead-in times for consultation preparation and approval.

**Office’s commenced the Council’s formal approvals processes to seek approval of the draft plan for Publication in late March 2019. The draft plan was considered at various meetings (e.g. Planning Committee, Cabinet, Overview & Scrutiny) cumulating in a decision by Full Council on 25th July 2019 to approve for Regulation 19 stage.**

7: Publish the Plan (Pre-Submission Consultation Reg 19) – August 2019 – September 2019

A submission ready version of the plan was made available for stakeholders and the public to comment on for a minimum of 6 weeks. Due to the partial overlap with the summer holidays, the plan was published for 7 weeks to allow sufficient time for Representations to be made (12th August-30th September 2019). In accordance with the Local Plan Regulations, this consultation was formal and statutory seeking specifically the Plan’s soundness for Examination in Public. A Publication version of the SA Report as well as the Habitats Regulation Assessment were also made available alongside the supporting evidence base.

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8 Full Council Report & Minutes available here: https://doncaster.moderngov.co.uk/iellListDocuments.aspx?CIId=130&MId=2850

8: Submission to the Secretary of State - 4th March 2020

The Council assessed the comments received during the regulation 19 formal consultation and considered that the Local Plan is sound, therefore, can be submitted for Examination in Public (EiP). Unlike the previous stage, the number of comments from residents were significantly fewer with the majority now being from the industry, with the exception of a notable response in respect to both housing and employment site proposals at the Main Town of Thorne-Moorends. The Plan was submitted to the secretary of State on the 4th March 2020.

9: Examination in Public - Spring/Summer 2020

The Plan will be examined by an independent Planning Inspector.

10: Inspector’s Report – Autumn 2020

11. Adopt - Winter 2020
3.0 Summary of Process and Main Issues

3.1 This stage now summarises: how the consultation stages set out in the timeline above at section 2 have been undertaken; what the main issues raised from each stage of the process were; and, how subsequent stages of the plan’s preparation has addressed the issues (or where this has not always been possible what the Council’s response is to the main matters raised). These stages are numbered as per those set out in the summary timeline above; please note stage 1 was collection of evidence base and hence the reason the below starts at stage 2.

Stage 2 - Regulation 18 Consultation – Vision, Aims & Objectives & Issues & Options Consultation (Regulation 18)

3.2 The Council published the Doncaster Local Plan: Vision, Aims & Objectives and Issues & Options document for consultation from the 13th July to the 7th September 2015. The Vision, Aims and Objectives set down a vision for the future of the borough and the aims and objectives we considered were necessary to achieve this. It provided a portrait of the borough now and summarised the issues and other plans and strategies that the Local Plan needed to take account off.

3.3 The Issues and Options set out the scope and purpose of the Local Plan and the process for producing it. It set out the important choices that needed to be made about where development should take place. It proposed three broad options for where to locate growth across the borough and so meet the vision, aims and objectives.

- Option 1 was the existing Core Strategy approach. Development would be directed in accordance with the Core Strategy and so the new Local Plan would stick with this approach;
- Option 2 set out a less dispersed approach than the Core Strategy with fewer towns and villages targeted for growth;
- Option 3 set out a more dispersed approach than options 1 and 2 with more towns and villages targeted for growth.

3.4 Option 1 featured a relatively complex settlement hierarchy; in addition to the Main Urban Area of Doncaster (which was common to all three Options) it had different levels of growth for Principal Towns, Potential Growth Towns, Renewal Towns and Conservation Towns. Options 2 and 3 were simpler; both featured “Main Towns” and “Small Towns” with option 3 additionally featuring a “Service Villages” category. All three Options permitted infill development within villages that have defined development limits. We also considered (but rejected) three other options (Options 4, 5 and 6) as unreasonable, unachievable and/or unlikely to meet the vision, aims and objectives of the Local Plan - but still sought any views on them.
anyway. Options 1 to 3 were not considered to be strict and in ‘either/or’ terms as it was possible that the preferred option used elements of two or more options.

3.5 At the same time, we published the responses from the Call for Sites consultation (October-December 2014) which was to establish which sites landowners and developers wish to see considered for development. The Sustainability Appraisal Scoping Report and a Sustainability Appraisal of Doncaster’s Growth Options were also published at the same time to predict the possible positive and negative effects of the options identified.

3.6 The documents were produced to enable the early involvement of the community and other stakeholders in the process so that their views could be taken into account when considering the overall Local Plan strategy and the different sites for development.

3.7 We carried out full consultation from 13th July – 7th September 2015 (extended 8 weeks rather than the statutory 6 weeks period) and we continued to receive comments until 11th September 2015. The consultation was carried out online (via Survey Monkey) however many responses were also received either by e-mail or letter. This stage was conducted in line with the adopted Statement of Community Involvement. The consultation approach can be summarised as follows:

- An email/letter was sent to all registered stakeholders on the Local Plan’s database setting out the purpose and content of the Local Plan and how to make comments;
- There was an extensive targeted social media presence and focussed engagement with ‘hard to reach’ groups such as young people and gypsies and travellers;
- Town/Parish councils and a number of stakeholder workshops were held;
- Ward Member events were held;
- Doncaster Chamber of Commerce workshop;
- Drop in session for DMBC staff;
- Email to all local libraries;
- Presentation at the Developer/Agents Forum;
- Business Doncaster – press release and advert in the Doncaster Star; and,
- “Team Doncaster partnership summit” - Around 100 key stakeholders from across the borough attended the event at Doncaster College including: elected mayor and councillors; chief officers and theme board chairs (Team Doncaster); Public sector organisations such as Doncaster Chamber of Commerce, Doncaster College; business and industry representatives; voluntary and community sector organisations such as Doncaster Citizens Advice Board and Doncaster CVS and Youth Council representatives. The “Team Doncaster partnership summit” brought together the public, voluntary and community sectors and featured presentations from key stakeholders, round table discussions and open workshop sessions.
Vision, Aims & Objectives & Issues & Options Consultation – Summary of Results & Response to Issues Raised

3.8 By the close of the consultation, the Council had received a total of 274 responses via Survey Monkey and 336 responses sent to us via letter/e-mail giving a total of 610 responses. These responses were from statutory agencies, individuals/residents, developers/land owners, elected members, town and parish councils and other local authorities. All responses received were collated and analysed. A copy of the Consultation Summary Report setting out all the details of this stage of the process was published by the Council in February 2016 and can be found here: https://www.doncaster.gov.uk/services/planning/local-plan-issues-and-options

3.9 The use of the online survey - Survey Monkey questionnaire enabled quantitative responses to be identified but also enabled other qualitative comments and thoughts to be submitted alongside. During this consultation stage, although we hadn’t consulted directly on the results of the Call for Sites (but made the information public) some Town and Parish Councils and members of the public submitted comments (158 letters) that were specific to these sites rather than the consultation issues we were seeking views on. These letters were therefore generally filtered out, although some of them were still analysed where they included relevant responses. All were kept on file to be used for latter stages of the Local Plan. The Council also sent letters to these individuals providing further information in respect to the status of these sites and the emerging local plan.

Vision, Aims & Objectives

3.10 By way of a very brief summary, there was general support for the draft vision and aims and objectives in terms of needing to set an aspirational but realistic vision for the Borough by the year 2032, as well as identifying the necessary aims and objectives for how we could achieve this. There was however many calls for amendments to both to reflect different stakeholder’s positions. For example, some felt there was too much focus on the economy over the environment and social sustainability. Health stakeholders expressed a desire to see a specific aim and objective in relation to health rather than being embedded in 2 separate aims. Others sought more coverage to the historic and built environment, to name but a few of the consultation response.
3.11 The Team Doncaster workshop identified that the draft vision and aims/objectives were generally on the right lines but needed more emphasis on people and building on what Doncaster’s good at. This included emphasis on skills, education and the cultural offer of the borough. We should aim high and stress our potential as a destination in our own right rather than as part of a region or corridor, but we should not pretend to be something we are not. We have great north-south connectivity so should not underplay our role in the Sheffield City Region. Needs to be an economic sector focus on what we are good at. Logistics, rail, Lakeside, Civic Quarter, Town Centre, Waterfront, Airport, and south-east growth corridor were all cited as assets to build on. Likewise, the need to market the borough better and retain graduates are important as well as existing residents being able to take up job opportunities. It was felt the objectives could be shorter and be more about ‘our people’ and diverse communities, such as families, younger people, our ageing population and associated health considerations. Saying we will become a centre of excellence in combating climate change might be too ambitious.

**Issues & Options**

3.12 In terms of the Issues & Options paper, the responses to the specific questions asked varied considerably by topic. For example, matters relating to housing and employment distribution, as well as strategic planning constraints such as Green Belt and Flood Risk, attracted higher levels of response compared to retailing or some of the transport questions.

3.13 The Team Doncaster workshop identified no clear strategic option preference, but there was evidently a great deal of pride in the Town Centre as a focus for the borough and a belief that with the right investment it could be so much better; there is a pressing need to improve its environment and night-time economy. At the same time there is a clear desire to also spread investment around the borough to aid regeneration and provide local housing opportunities and local (including small-scale) employment opportunities to many of Doncaster’s communities. There was some support for this to include the better serviced villages. Neither Green Belt nor Flood risk were seen as reasons to compromise our vision but market realism is necessary for both housing and especially large-scale employment investment. Internal transport infrastructure needs (especially road links and better bus services) are seen as crucial. Schools capacity is a concern. A greater mix of housing is required to address affordability, first-time buyers, aspirational housing (to support inward investment) and the ageing population. More could be made of existing and potential water features.
3.14 There was some support from the workshop for each of the three Options. Option 1 was seen as a good longer-term strategy to deliver infrastructure. Option 2 was felt to be the best way of making Doncaster town a more attractive place and so encourage investment across the borough (and there was support for higher housing growth in the main urban area than the top of the range set down). Option 3 was seen as offering the “best of both worlds” – support for Doncaster and a greater level of dispersal to other places. The rejected New Town option makes sense in terms of avoiding Green Belt and flood zones but would not help existing settlements in need of growth & regeneration. We should spread homes growth and development around the borough. The growth corridor is the south-east of the borough so people must be able to access these opportunities. Land (including that in flood zones) is an asset that we can’t afford to simply direct development away from such areas. We need flood resilient developments and use the management and creation of water features to help make attractive places to live. From a building industry perspective the best location for new homes is the west of the borough where there is the issue of Green Belt; the east and especially north-east is less attractive and there is the flood risk issue. A Green Belt review should target growth areas. We do not need to take out large areas but some areas do not fulfil Green Belt functions. Villages are not sustainable places for large scale growth but some small schemes in the better served ones would be justified. If we over develop places such as Bawtry and Tickhill they will lose their identity. Armthorpe and Edlington are growing; we need to help other communities grow and development is needed in the north-east such as Thorne.

**Sustainability Appraisal Scoping Report & Appraisal of Growth Options**

3.15 As set out above, the Council also published its Sustainability Appraisal Scoping Report as well as a Sustainability Appraisal of the Growth Options alongside the consultation. The methodology used to assess the identified growth options is generally considered to be sound. Statutory agencies (e.g. Environment Agency, Natural England and English Heritage) welcome the changes made in response to their previous comments on the report and are generally satisfied with the scope of the report. The scoping report covered the majority of plans and programmes and includes an appropriate baseline. Some respondents put forward suggested changes to the baseline section (e.g. further information on key implementation strategies) and the sustainability framework (e.g. new/replacement indicators and sub-objectives) to strengthen the scope of the assessment.
3.16 However, the scoping report was judged to be weak with regard to archaeological heritage assets, particularly undesignated assets (South Yorkshire Archaeological Service). SA should consider both non-designated as well as designated heritage assets. The service put forward suggested changes on how this omission could be addressed (e.g. sites should be archaeologically scoped to limit the likelihood of conflict between allocation and conservation of such heritage assets and their settings). The target to ‘increase’ the number of archaeological sites’ should be reflected within the objectives.

3.17 In terms of the growth options, the RSPB were critical about the lack of attention given to the natural environment, landscape and other environmental factors in the appraisal. As such, the SA/SEA is not currently legally compliant. English Heritage broadly agreed with the conclusions on the options but the results should be amended under the historic environment in relation to option 1 (business as usual) and option 5 (environmental protection). Both options should score +/-.

3.18 Ten responses were received (based on the same wording) from DLP consultants. They stated that the appraisal was fundamentally flawed because it did not provide any meaningful conclusions as to influence future policy decisions on the broad distribution of growth across the borough. The level of uncertainty is far greater than suggested and there was too much conjecture. The impact of the various options will change depending upon the overall level/quantum of housing and employment. JVH Town Planning Ltd reiterated the same arguments and did not consider that the growth options represented all the realistic options available.

3.19 The settlement audit underpinning the appraisal is flawed particularly with regard to the scoring at Mexborough. Some respondents specifically commented on the process of preparing the SA/SEA. RSPB said it was premature to select or dismiss options before the appraisal had been carried out. Gladman’s said that the decision making and scoring should be robust, justified and transparent - based on the same level of detail in relation to both chosen and rejected alternatives. Johnson Brooke said that the SA/SEA needs to assess mixed use extensions as well as housing and employment sites. Natural England and the Environment Agency suggested minor changes to some of the sub-objectives/ targets within the SA/SEA framework. Relatively few comments were made on the conclusions of the report but there was consensus that options 1 and 2 would be more sustainable than the others.

Vision, Aims & Objectives & Issues & Options Consultation – How were the Issues Raised Taken into Account?

Vision, Aims & Objectives
3.20 A number of revisions were made to the draft vision and aims and objectives to take into account the comments received from the consultation. A summary table setting out the ‘before and after’ of each was published in March 2016 alongside the next stage of the local plan consultation (Homes & Settlements – see below) and is available to view in full here: [https://www.doncaster.gov.uk/services/planning/local-plan-issues-and-options](https://www.doncaster.gov.uk/services/planning/local-plan-issues-and-options) with an extract provided in this report at Appendix 1A.

**Issues & Options**

3.21 Responses in respect to housing distribution and the strategic options identified in the consultation were used to inform the next stage of the local plan process (Homes & Settlements – see below). Consultation responses, including the views of the strategic partnership ‘Team Doncaster’, contained two clear messages in respect of housing distribution:

i) the larger and more sustainable urban areas ought to be the main focus for housing growth and this should include making good use of brownfield sites including sites in flood zones provided these are, or can be made, safe; and,

ii) local housing needs should be met locally and this should extend to those smaller settlements that provide a good range of services; there was recognition that this larger spread of locations should provide for a better mix and choice of sites and would include sites in parts of the borough that would likely prove more attractive to the housing market and so improve the delivery of new homes.

In terms of other issues included in the scope of the consultation, there were some other notable responses as follows which have also been reflected through subsequent drafting of local plan policies:

i) support for providing jobs at locations that are less suitable for housing (for example some motorway junctions), provided that good transport links are in place, and that certain types of employment uses should be clustered together e.g. Airport, Unity;

ii) responses to Offices being located in town centres to support other town centre uses was fairly evenly met with responses saying there should be greater flexibility to allow for out-of-centre office accommodation;

iii) the vast majority agreed that both housing and employment development needs should be met as far as possible on land/sites outside of the Green Belt;

iv) Over two-thirds agreed that it is acceptable to use Brownfield and other well-located urban sites in flood zones provided defences and mitigation makes the development safe;
v) Around half disagreed that sites in flood zones should be additional to the requirement due to concerns around flood mitigation and viability i.e. where confident of deliverability they should count towards the borough’s requirement;

vi) In terms of Town Centres, that was a consensus that there should be flexibility towards the approach to encourage mixed use development and town centre uses, and emphasis on key town centre sites (such as Waterfront and other Brownfield sites);

vii) Over half agreed Town Centre boundaries should be amended to reflect changing retail patterns and that no further retail and leisure uses (other than furniture/DOIY/bulky goods) should be allowed outside of existing centres;

viii) Around three-quarters thought land within existing retail warehouse parks that has been vacant for a long period should be developed for other uses such as leisure and community facilities;

ix) Just under half agreed with the proposed retail hierarchy of centre;

x) In terms of transport proposals, over three-quarters agreed the Council should ensure upgrades to the A1(M) and M18 are progressed by Highways England. There was also support for projects such as duelling of the A630 Westmoor Link Road, A1(M)-A19 Link Road, and Hickleton-Marr bypass.

xi) Around two-thirds of the responses supported a new rail station to serve Doncaster Sheffield Airport with links to Doncaster and Sheffield Rail stations and junction improvements;

xii) Nearly three-quarters of the responses supported new off-road greenways and leisure routes as well as there being strong support for new cycle ways adjacent to roads;

xiii) Nearly three-quarters also responded saying there should be greater emphasis on managing traffic movements to reduce accidents and improve air quality;

xiv) Around a third thought that no development should take place on any mineral resource of economic value and half thought that developers should identify the economic value of the mineral and the feasibility of extraction prior to development;

xv) In terms of housing needs, the majority thought there should be a larger number of small gypsy & traveller sites as opposed to larger well-laid out sites in 10+ pitches in countryside locations. Over half said that affordable housing requirement should be flexible to reflect what development could afford and having regard to other contributions rather than risk development being unviable. Around half also stated that Houses in Multiple Occupation should not be allowed to concentrate in particular areas. A similar number also said bespoke student accommodation should be provided.
3.22 The consultation responses supported strongly Options 1 and 2 but there was significant support for providing housing close to where services were available to meet local need. There was also support for various forms of hybrid Option. There was very little support for the other three rejected Options (Option 4 - a new settlement; Option 5 - greater dispersal; Option 6 - low growth). Nearly half of the responses concluded that all reasonable options for the locations of growth had been considered. Consultation responses were assessed alongside the Sustainability Appraisal and a hybrid approach was preferred and therefore taken forward as the preferred option.

**Sustainability Appraisal Scoping Report & Appraisal of Growth Options**

3.23 To address the consultation comments received an updated SA Scoping Report was prepared and re-published in March 2016 as well as a revised SA of the Growth Options which expanded and updated on the previous work, including to take account of new evidence. The SA focused on the 3 options that were considered to be realistic and credible (as opposed to the full 6 options which would have included the 3 discounted options). It was also prudent to include an appraisal of the hybrid option which was now being identified as the preferred approach as part of this report. Given the changes to the draft vision and objectives these were also tested against the objectives of the SA to highlight both the potential synergies and inconsistencies, with the findings being that they were mutually reinforcing and compatible.

**Stage 3 – Regulation 18 Consultation - Site Selection Methodologies Consultation**

3.24 To ensure the Local Plan proposes the most sustainable development allocations, that are in conformity with national planning policy, and will deliver the plan’s vision, aims and objectives, a draft site selection methodology was subject to full public consultation for a period of 4 weeks between Tuesday 24th November and Monday 21st December 2015. The methodology set out what the various stages of the site selection process would entail, including our proposed sustainability appraisal site criteria. The methodologies were not site specific at this stage. Therefore the consultation was only about the process for appraising sites rather than seeking views as to which sites should be supported or rejected.

3.25 This was an opportunity therefore for any stakeholders, or wider interested parties, to make comments on the proposed approach. The Council published two separate papers at this stage. The first methodology dealt solely with potential housing and economic development land allocations (including mixed use sites) with the second being in respect to minerals sites.

3.26 Consultation was carried out in accordance with the adopted Statement of Community Involvement and broadly summarised as follows:
Advertised and promoted the consultation on the council’s website;
Everybody on the Local Plan contacts database was sent an e-mail;
Libraries were contacted;
Social media was used e.g. Facebook and Twitter.

Site Selection Methodologies Consultation – Summary of Results & Response to Issues Raised

Housing & Employment Site Selection Methodology

3.27 Following the close of the consultation, a total of 36 different consultees responded to the document providing 148 specific comments on various parts of the document. The breakdown of responses can broadly be grouped together as follows:

- Statutory consultee – 12;
- Town/Parish Council – 3;
- Elected Member – 1;
- DMBC Dept – 1;
- Developer/ Landowner/ Agent – 15;
- Community Group/Individuals – 4;

3.28 In addition, comments were provided by the Planning Advisory Service (provided by AMEC Foster Wheelhouse – now Wood Environment & Infrastructure Solutions UK Ltd) on the draft methodology as part of the Council’s on-going support from DCLG (now MHCLG) following the withdrawal of the Local Development Framework Sites & Policies Plan. A full consultation summary and Officer response from this stage was published in 2018 and available to view here: https://www.doncaster.gov.uk/services/planning/local-plan-site-selection-methodology-consultation

3.29 There were some concerns expressed about the sequencing of the methodology, in particular the Green Belt, Flood Risk and Sustainability Appraisal stages. There was also concerns that the criteria were too brownfield focussed in places and that this did not accord with NPPF.

Minerals Selection Methodology

3.30 At the close of the consultation, there were 9 responses to this methodology broken down as follows:

- Statutory consultee – 2;
- Developer/ Landowner/ Agent – 5;
- Other stakeholders – 2 (Canals & Rivers Trust & RSPB).
3.31 There were recommendations that further consideration be given to the potential for opportunities to use the inland waterway network for transportation of minerals. Natural England also recommended use of their SSSI Impact Risk Zones as a screening tool as opposed to the proximity criteria as drafted.

**Site Selection Methodologies Consultation - How were the Issues Raised Taken into Account?**

3.32 In respect to the Housing & Employment (& mixed use) methodology, comments made informed subsequent Local Plan preparation. For example, the SA criteria were reviewed and a number considered as being duplicative/double counting in respect to Brownfield land scoring were removed and/or revised e.g. Greenfield sites changed to be a neutral score as opposed to a negative. Other criteria were revisited, for example the Biodiversity SA scoring were changed to reflect Natural England’s suggestion to use an alternative appraisal criteria to that which was subject to consultation. Likewise, in respect to the Minerals methodology, a number of changes were made to the criteria, including the need to consider the canal and rail network and ensuring industrial mineral sites and areas of search were considered. The Sustainability Appraisal criteria were also reviewed and amended to consider biodiversity opportunities as per Natural England’s comments and to be consistent with the revisions made to the Housing & Employment methodologies/criteria.

**Stage 4 - Regulation 18 Consultation – Homes & Settlements Consultation**

3.33 The consultation ran from 7\textsuperscript{th} March - 18\textsuperscript{th} April 2016 (6 weeks) and set out the proposed number of new homes we were planning for and how we thought they should be distributed around the borough’s towns and villages based on the hybrid option preference form the previous consultation.

3.34 The council proposed that we should plan for 920 (net) new homes per year 2015-2032 (so 15,640 new homes in total over the plan period). This reflected the identified need for both open market and affordable housing to meet the future needs of the existing population and the needs that would arise from planned jobs growth. The 920 figure therefore was made up of existing population growth (baseline – 582 new homes per annum) and an economic growth-led requirement (338 new homes per annum).

3.35 The consultation proposed that the local need component of the housing requirement would be distributed to settlements with the best levels of service provision (Doncaster Main Urban Area, Main Towns & Service Towns/Villages) on a proportionate basis to their existing populations. Meanwhile, the economic-led housing growth was proposed to be directed to the most sustainable places identified as being the top 2 tiers of the emerging settlement hierarchy (i.e. the Doncaster Main Urban Area and Main Towns).
3.36 Approximately 51-55% of this housing growth was proposed for Doncaster Main Urban Area and 35-39% to the seven Main Towns of Adwick/Woodlands, Armthorpe, Conisbrough/Denaby, Hatfield/Stainforth/Dunscroft/Dunsville, Mexborough, Rossington and Thorne/Moorends. Approximately 10% was proposed to be distributed around 10 smaller Service Towns and Villages (Auckley/Hayfield Green, Askern, Barnburgh/Harlington, Barnby Dun, Bawtry, Carcroft/Skellow, Edlington, Finningley, Sprotbrough, and, Tickhill). The remaining 40 Defined Villages were all proposed as no growth settlements.

3.37 The benefits of this approach were considered as being:

- Steered most of the new housing to the Doncaster Main Urban Area;
- Significant levels of housing was still being dispersed to smaller towns and villages to meet needs;
- Provided a range of sites and uses the borough’s land assets;
- Focussed new housing to where the best levels of service provision were;
- It responded to the consultation comments raised from the Issues & Options stage;
- Green Belt would only be used in exceptional circumstances; and,
- Avoided flood zones except where necessary to meet local need, and then only if sites are or could be demonstrated as being safe from residual risks.

3.38 This stage was conducted in line with the adopted Statement of Community Involvement. The consultation approach can be summarised as follows:

- An email/letter was sent to all registered stakeholders on the Local Plan’s database setting out the purpose and content of the Local Plan consultation and how to make comments;
- Press advert;
- There was an extensive targeted social media presence;
- A Local Plan ‘Bulletin’ was published and circulated setting out the latest news and progress with the emerging local plan;
- Town/Parish councils meetings were held;
- Ward Member workshops were held (prior to the consultation starting) with e-mails notifying at commencement of consultation;
- Email to all local libraries
Homes & Settlements Consultation – Summary of Results & Response to Issues Raised

3.39 The consultation resulted in 157 letters of response being received making 268 specific points. 14 of these were from Town and Parish Councils, 29 from agents representing landowners/developers and 67 from individuals/residents and 5 from neighbouring local authorities. An analysis of the responses was published in September 2018 alongside the next round of the local plan consultation (Draft Policies & Proposed Sites – see below) and are available to view here: https://www.doncaster.gov.uk/services/planning/homes-settlements-and-updated-sustainability-appraisal-of-doncaster-s-growth-options-consultation-march-2016

3.40 The main issues raised were:

- The size of the housing requirement for the Local Plan;
- The amount of land that should be allocated to meet the requirement;
- Flood risk and the need for a sequential approach to identifying sites for future development;
- Settlement Hierarchy and Housing Distribution; and,
- Housing development around the airport.

Further detail of the comments received as well as the responses from the Council can be found at Appendix 1.

3.41 There were 14 separate stakeholders who commented on the SA Report, including the 3 statutory consultees (Historic England; Environment Agency & Natural England). The EA raised some inconsistencies between how objectives had been appraised in respect to flood risk. Historic England stated there would be a need for a robust policy framework to assess the appropriateness of sites. Natural England were content with the SA and reiterated the need for a Habitats Regulation Assessment. Highways England identified the need to work in partnership to address and mitigate any negative effects from the options in respect to air pollution. A number of developers gave their preference/support to the options which was generally dependent on where sites were located. The Home Builders Federation set out the need to consider a greater range of housing requirements. Both the RSPB and Yorkshire Wildlife Trust agreed that there would be flood risk issues associated with growth at Thorne-Moorends and that any allocations in close proximity to Thorne-Hatfield Moors would have potential to impact on a European designated site.

Homes & Settlements Consultation – How were the Issues Raised Taken into Account?

3.42 The following brief summary sets out how the key issues from the consultation were taken into account; again further detail is provided at Appendix 1.
• Housing requirement - the Council commissioned independent economic forecasting by Peter Brett Associates (June 2018) to update the evidence base on housing need and inform the local plans housing target and employment land requirement. It concluded that in order to aim to achieve the SCR target of 1% economic growth per annum, the housing target should be 912 net new homes per year. This was very similar to the housing target being proposed throughout the local plan to date (-8 dwellings);

• Housing allocations and additional land supply – calls to allocate for the full 17 years left of the plan period were rejected as it was considered in line with NPPF to identify allocations for 15 years and a further 2 years would likely require Green Belt and/or Countryside. Developable land supply for the remainder of the plan period where specific allocations were not being made for has been identified through the next stage of the local plan.

• Sequential approach to flood risk – a strategy proposing housing growth within flood risk areas carries significant risk, however large parts of the borough are constrained by flood risk and there are a large number of sites with permission where mitigation has been identified. Completely avoiding development in such locations without proper justification could lead to less sustainable development and travel patterns. The proposed approach seeks to balance the need to meet local needs locally and other sustainability issues with flood risk considerations. However, to plan for anything more than local needs in flood risk areas would run a very high risk of the plan being found unsound.

• Settlement hierarchy & housing distribution – competing calls for different settlements to have a ‘bigger slice of the cake’ do not amount to a more justified or coherent strategy. Criticism of the simplicity of the settlement audit have been addressed through an update as well as a comparison of the evidence with other local authorities where it has been identified as being comparable. Settlement profiles have also been produced to address comments made and published at the next stage.

• Housing development around the Airport – The Council wants to ensure the growth success of this important economic asset can continue to be supported through the local plan. As well as land to deliver ambitious economic growth and significant jobs potential, the draft Airport masterplan (covering the period 2018-2037) also identifies several potential sites for housing development around the Airport site. This housing land equates to far more land than required in order to deliver the local plan settlement strategy, even when taking into account that the masterplan runs for an extra period. Given sufficient housing supply has been identified to meet the settlement strategy for the plan period, including for Auckley & Hayfield-Green, the local plan is proposing that there are unique circumstances that warrant support for some of the potential housing identified in the masterplan, but that this can only be justified in tandem with delivery of significant jobs as set out in the masterplan. In order to do this, the council are proposing an additional and conditional allocation of up to a maximum of 1,200 houses on land at the
airport. The release of housing will be strictly related to the clearly demonstrated delivery of jobs at the airport, based on draft local plan Policy 7 – Doncaster Sheffield Airport.

3.43 In response to the comments received on the SA report, a HRA was drafted in preparation for the next stage of the local plan process, and a robust site appraisal process to consider potential effects from sites on the built environment (Heritage Impact Assessments were prepared) as well as archaeology (An Archaeological Scoping Report was commissioned) was put in place. There was ongoing liaison with Highways England on potential sites (SA Criteria in relation to Impact on the Strategic Road Network). A wider range of potential housing requirements was also appraised through the next iteration of the SA report as identified by the Home Builders Federation.
3.44 The Council consulted on the Draft Policies & Proposed Sites from 13th September – 26th October 2018 (6+ weeks). The draft Local Plan policies (73 in total) were published as part of a Policy document for comments to be provided, although the scope only included the policies themselves as opposed to any supporting/explanatory text. The vast majority of the supporting evidence base for the Local Plan was also published at the same time, such as the Phase 3 Green Belt Review, Economic Forecasting and Housing Needs Assessment, Viability Testing and so forth. The Interim Sustainability Appraisal (SA) was also published for comments. A consultation booklet asking a number of specific questions in respect to both the policies and evidence base/SA was made available alongside a response form, although comments were accepted in whatever format they were returned.

3.45 One of the main aspects of the consultation was in respect to site allocations for housing, employment and minerals sites in order to meet the development needs of the borough over the plan period.

3.46 The consultation identified sufficient housing sites to deliver the housing target of 920 net new homes per year over the plan period to 2032 (15,640 new homes) and a plan period employment land requirement of 407 hectares to ensure sufficient land is identified to grow the economy by 1% per annum in line with the Sheffield City Region Strategic Economic Plan;

3.47 Housing sites were proposed in line with the Settlement Hierarchy and distribution around the borough approved previously for consultation by Full Council in spring 2016, and in accordance with national planning policy in respect to Green Belt and flood risk. The housing that could be expected to be built on the sites shown in the consultation totalled 17,481 new homes (+1,841 houses compared to the 15,640 target, or an annual average of 1,028 compared to the 920). Of this total:

- 11% (1,960 new homes) of the sites being proposed to be allocated were within the Green Belt;
- 18% (3,090 new homes) of the sites being proposed to be allocated were currently designated as Countryside Policy Area;
3.48 The Local Plan will also allocate some very large sites (e.g. Unity) which may not all be complete before 2032, but the entire site is being allocated and could be built if the market supports higher than average sales/completions. These sites provided an additional housing potential of 3,047 new homes. Sufficient land was therefore being proposed to be allocated in the Local Plan for 20,528 new homes, or 1,208 new homes per year. This figure is not a minimum for new housing either because a Local Plan site allocation is not the only way that housing will come forward. For example, additional housing will be provided from windfall development (sites not allocated in the local plan) or permissions from the smaller villages which are excluded from the above figures.

3.49 Of the 209 sites proposed to be allocated for housing in the Local Plan, 80% (168 sites) were on smaller/medium sized sites (less than 100 houses) which would be of interest to the smaller and medium sized builders. Additional housing (up to 1,200 new homes) at the Airport was also subject to the consultation which would all be additional supply to the numbers set out above and the majority of this is conditional on the basis of significant job creation being delivered in and around the Airport first and foremost.

3.50 Large employment site allocations were proposed at the Airport, Carcroft Common and at Bradholme, Thorne. Other employment sites subject to existing permission will also contribute towards the employment land requirement such as at Askern (former Saw Mills); Armthorpe (Westmoor Park and Hatfield Lane); Hatfield-Stainforth (Unity); and, Rossington (Iport). 2 minerals sites were also proposed via the consultation.

3.51 This stage was conducted in line with the adopted Statement of Community Involvement. The consultation approach can be summarised as follows:

- Everybody on the Local Plan database received notification via e-mail;
- The Council’s Communications Team put out press releases and ran articles on social media (e.g. Facebook/Twitter) which were re-tweeted/posted by the Council’s Planning Team;
- Members of the Local Plans Team met all DMBC Ward Members and attended circa 15 Town/Parish Councils Meetings during the consultation period;
- A number of internal meetings were held with DMBC stakeholders as well as some external bodies (e.g. Education, CPRE);
- Officers attended Business Doncaster Property Forum to present;
- Proposed sites (excluding those that already had planning permission) had site notices posted around the site to publicise the consultation.

**Draft Policies & Proposed Sites - Summary of Results & Response to Issues Raised**

3.52 A total of around 1,200 separate responses were received following the close of the consultation, broadly broken down as follows:
• 927 x Individual letters/e-mails/completed response forms;
• 265 x Standard letters objecting to proposed sites;
• 4 x Petitions objecting to proposed sites.

3.53 This was a significantly larger response compared to previous comparable consultations. Around 700 (or 58%) of the responses received were from ‘new customers’ (including agents/developers and individuals) who had not engaged with the local plan previously. Broadly, the responses could be broken down as follows:

• Individuals/Members of the Public/Communities = 980;
• Landowners/Developers/Agents = 142;
• Infrastructure Providers = 10;
• Statutory Consultees = 3;
• Neighbouring/SCR Local Planning Authorities = 6;
• DMBC Ward Members = 11;
• Town/Parish Councils = 21;
• Internal DMBC Stakeholders = 8;
• External Stakeholders = 15 (e.g. Sheffield City Region Combined Authority/Campaign to Protect Rural England).

3.54 At the end of the consultation, the DMBC Facebook post/article had reached 20,812 people which resulted in 155 comments being posted (additional to the above figures) and was shared by 103 people. The post resulted in 2,197 ‘clicks’ through to the local plan consultation part of DMBC’s website. A number of individuals felt that they should have been contacted by letter and that the publicity was not sufficient given the importance of the consultation, and some suggest DMBC have deliberately tried to progress the plan without undertaking proper consultation.

3.55 Broadly, the responses received related to the following areas:

• Vision & Objectives – Around 90 separate consultees commented on the draft Vision & Objectives for the local plan – most were broadly supportive of these although a number identify proposed allocations as being in conflict with certain individual objectives in relation to protection of Countryside/Green Belt etc;

• Draft Policies – Around 140 separate consultees commented on the 73 draft local plan policies making 753 separate comments. The policies that attracted the highest number of comments being: Policy 2: Spatial Strategy and Settlement Hierarchy x 66 comments; Policy 3: Level and Distribution of Growth x 58 comments; Policy 6: Housing Allocations x 39 comments; and,
Policy 29: Open Space Provision in New Developments x 32 comments. Every policy received at least one comment.

- Proposed/Rejected Sites – This was the part of the consultation that by far attracted the highest level of response. Around 590 people made comments in respect to housing sites, and around 190 people commented in respect to employment sites:
  - Housing –
    - The vast majority of the responses to the consultation were from our residents and communities and focussed on proposed housing sites and were generally raising objections for various reasons.
    - In general, objections were received to virtually all the proposed housing sites on land currently designated as Green Belt or Countryside, although other urban sites also attracted objections including sites already allocated for housing in the Unitary Development Plan and Brownfield sites.
    - The sites which received the highest numbers of objection were:
      - Site Ref 165/186 – Crabgate Lane, Skellow – petition of 465 signatures, 203 standard letters of objection and 27 individual letters of objection to this Green Belt site;
      - Site Ref 777 – Plot 3, Doncaster Rd, Harlington – petition of 212 signatures and 31 individual letters of objection to this Green Belt site;
      - Site Ref 164/430 – Warning Tongue Lane, Cantley – petition of 144 signatures and 75 individual letters of objection to this Countryside site;
      - Site Ref 350/407 – Rose Hill, Cantley – petition of 83 signatures and 30 individual letters of objection to this UDP Housing Allocation proposed for re-allocation;
      - Site Ref 147 – Hatfield Lane, Barnby Dun – 90 individual letters of objection to this Countryside site; and,
      - Site Ref 115 – Alverley Lane, Balby – 70 individual letters of objection to this Green Belt site.
The reoccurring issue from the vast majority of the objections frequently related to the capacity of the borough’s infrastructure (especially highways, schools and GPs) to accommodate additional housing. Other common objections related to: loss of Green Belt/ Countryside; there is no need for all of this additional housing; loss of greenfield and/or agricultural land; that there are better sites elsewhere that could be developed first; increase in flood risk; biodiversity loss; and, increased risk to safety from congestion and traffic and pollution concerns.

Employment Sites:

- There were very few comments in relation to the proposed employment sites with the exception of both the proposed (Ref: 160 Bradholme) and rejected (Ref: 001 Thorne North J6) sites at Thorne;
- Site Ref 160 Bradholme – Petition of 60 signatures and 151 letters with objections also from Ward Members, Town Council and Neighbourhood Plan Group;
- Site Ref 001 Thorne North – 17 individual letters objecting. Support from Ward Members.
- Again, objections included concerns around use of greenfield and agricultural land, increase in traffic and congestion with associated pollution, increase in flood risk; and, loss of biodiversity and habitats.

Housing Growth at Thorne & Moorends – Around 40 x individual responses (including the Thorne & Moorends Neighbourhood Plan Group) to the consultation objected to the emerging Local Plan and its policy approach to future housing development at Thorne-Moorends. In summary, the comments were that avoidance of flood risk is not a reason to curtail future growth and much needed regeneration in the area as flood risk is something that can be mitigated rather than avoided;

Sustainability Appraisal – Circa 18 people commented on the supporting Sustainability Appraisal Report, including all of the Statutory Consultees;

Other evidence base documents also attracted a number of people commenting, including the Green Belt Review (61 people), Economic Forecasting & Housing Needs Report (44 people) and Settlement Background Paper (42 people).
• New sites or revised site boundaries - following the close of the consultation, a total of 64 new or revised site boundaries were put to the Council for consideration. Of these, 55 were considered as being reasonable options (i.e. sites that had potential to be allocated in line with the preferred strategy) and therefore required to be assessed and considered through the Publication version of the Local Plan.

3.56 A Consultation Summary report of the main issues with Officer responses was published alongside the Regulation 19 Local Plan in July 2019 and is available to view here: [https://www.doncaster.gov.uk/services/planning/local-plan-consultation](https://www.doncaster.gov.uk/services/planning/local-plan-consultation) Further detail is found at Appendix 1 also for ease of reference.

**Draft Policies & Proposed Sites - How were the Issues Raised Taken into Account?**

3.57 The Council reviewed the comments from the 2018 consultation as part of drafting the Publication version of the local plan. In terms of the main changes made to address the consultation, the following provides a summary:

- A Revised draft Statement of Common Ground was published (badged as a ‘living document’) setting out the cross-boundary strategic issues with neighbouring authorities and other relevant organisations. Such matters have been subject to ongoing discussions with the appropriate prescribed bodies and organisations;
- Plan period – the plan period was extended from 2032 to 2035 to ensure 15 years minimum from adoption;
- Settlement Hierarchy – The proposal to ‘wash-over’ all but 12 of the Defined Villages with Green Belt or Countryside was reconsidered and the previous approach of retaining all 40 Defined Villages with development limits taken forward. A new policy-approach to support the potential for sites on the edge of the Defined Villages in the Countryside ‘half’ of the borough to come forward has been introduced;
- Housing requirement – The longstanding target of 920dpa was retained, but in line with PPG the requirement has been expressed as a range with the bottom of the range being the figure as derived by the standard methodology for calculating 5YHLS, but allocations made at the top of the range (minimum)
- Housing requirement – the plan period requirement was calculated to account for the extension of the plan period as well as actual delivery in years 1-3 (1st April 2015 - 31st March 2018) with a residual requirement derived (882dpa) for the next 15 years of the plan period (13,235 dwellings 1st April 2018-31st March 2033);
- Housing supply – Monitoring of permissions was updated to use 1st April 2018 data and allocations were identified for the settlements where supply from deliverable/developable sites was insufficient to meet the plan period
requirement. A new 5YHLS Statement was prepared to demonstrate deliverability and to ensure compliance with the revised definition as per the changes to NPPF in 2018;

- **Infrastructure capacity** – the majority of the responses raised concerns around the capacity of the borough’s infrastructure to accommodate further development. The Infrastructure Delivery Plan has been updated with the latest information on such matters and work has been undertaken looking at both the strategic and local road network. Allocations in the plan now have developer requirements as well as being subject to policies in the plan that would require contributions (such as schools, transport, highways etc);

- **Viability** – to address concerns that the Government updated its guidance and policy in respect to viability in 2018, coupled with the passing of time since the evidence was prepared by the Council (2016), a new viability evidence base was commissioned and informed the drafting of policies in the plan e.g. affordable housing policy and the range;

- The Rural Exceptions policy was deleted with a new policy drafted in respect to Removal of Occupancy conditions;

- The Mexborough Waterside policy was deleted;

- The Providing for Energy Minerals (Hydrocarbons) policy was significantly revised to largely default to national policy;

- The new and revised sites were all (re)assessed in line with the site selection methodology;

- **Employment Allocations** – There was notable objection to the proposed employment site at Bradholme, Thorne (Site Ref:160). The site was rejected as an allocation in the Publication version of the plan and replaced with a similar site at Thorne (Site Ref:001 M18 J6 Thorne North);

- **Housing Allocations** –
  
  - 2 notable Green Belt allocations (Site Ref:234 Broadaxe, Scawthorpe and Site Ref:139 Wath Rd, Mexborough) were deleted as allocations in the plan;
  
  - A number of additional allocations, including urban and mostly brownfield non-Green Belt sites, were allocated at the Main Urban Area;
  
  - 2 large sites at the Main Urban Area (Site Ref:241 Mere Lane, Edenthorpe and Site Ref:255 – Hungerhill) were supported as allocations to reflect both sites were now permissioned (Appeal decision in respect to the former received February 2019);
  
  - A large allocation was added at Thorne-Moorends (Site Ref:081/343 – Alexandra St, Thorne) and a smaller site at Moorends (Site Ref:501 – Marshland Road) which reflected progress in terms of planning application (former) and an Appeal decision (latter) which collectively increased the settlement’s supply by 230 dwellings and took the Town into the middle of the growth range and addresses concerns around the lack of growth to this Main Town;
o For the first time, a deliverable/developable allocation (Site Ref:1028 Sunderland Street) was identified to part-meet the settlement requirement at Tickhill following technical details submitted by the Representation showing constraints in respect to access could be overcome;

o A housing allocation at Askern (Site Ref:041 Askern Industrial Estate) has been reduced (circa 50%) with part now being retained as Employment Policy Area to address concerns around the loss of employment land/start-up businesses;

o Housing allocations at Carcroft-Skellow (Site Ref:165/186 Crabgate Lane) and Barnby Dun (Site Ref:147 – Hatfield Lane) have had capacity/site boundaries reduced to reflect objections around size of the site relative to settlement housing requirements as well as to ensure there would be no built development in parts of the site that are flood risk;
Stage 6 – Regulation 19 Consultation - Doncaster Local Plan 2015-2035 – Publication

3.58 Officer’s commenced the Council’s internal approvals processes in Spring 2019 cumulating with a report\(^\text{10}\) to Full Council on 25\(^{th}\) July 2019. Members broadly gave their support to the Plan, which they felt was an aspirational document that shaped the vision for the Borough in the future. Members recognised that the policies in the Plan would not only ensure that the housing and economic growth needs of the Borough were sustained, but would also help to protect the environment, and would also further improve the quality of life and health and wellbeing of its communities. It was resolved that:

(1) the Doncaster Proposed Submission Local Plan be approved, subject to the inclusion of a number of revisions made to the policies in the Local Plan document, as detailed in the Addendum, to seek representations as to soundness and legal compliance over a minimum statutory 6 week period, and submission to the Secretary of State for examination subject to no significant issues arising from the minimum statutory 6 week stage;

(2) the Assistant Director of Development, in consultation with the Local Plan lead Portfolio Holder be authorised to make any necessary minor editorial amendments to the Local Plan Proposed Submission Plan and accompanying Policies Map, the sustainability appraisal and any other relevant documents prior to Publication and Submission, subject to these not involving the addition or deletion of any site and not otherwise changing the plan’s direction or overall strategy where it is able to do so;

(3) the Assistant Director of Development, in consultation with the Local Plan lead Portfolio Holder be authorised to request that the Local Plan Inspector recommend any main modifications to the Submission version of the Local Plan to ensure soundness in order for the plan to be legally compliant; and

(4) following (1) to (3) above, authority be given that public consultation be undertaken on any main modifications to the Submission version of the Local Plan recommended by the Inspector, including the consequential changes in order that the Local Plan can be finalised in advance of it being submitted to Full Council for adoption.

3.59 The Council published the draft local plan (Regulation 19) on 12\(^{th}\) August 2019 which was the version we considered was ready for Examination by the Government. Publication ran until 6pm on 30\(^{th}\) September 2019 which was a period of 7 weeks, as

\(^{10}\) [https://doncaster.moderngov.co.uk/ieListDocuments.aspx?CId=130&MId=2850](https://doncaster.moderngov.co.uk/ieListDocuments.aspx?CId=130&MId=2850)
opposed to the statutory minimum requirement of 6 weeks. The additional week allowed for one of the days during the period being a bank holiday as well as some additional time to allow for the slight overlap with the summer holiday period. The plan and all of the supporting evidence base, including the supporting Policies Map, Publication version of the SA Report and Habitats Regulations Assessment, were made available for technical comments on whether it met the soundness and legal tests as set out in the Planning legislation. The Publication stage was carried out in accordance with the requirements of the Statement of Community Involvement and a Statement of Representation Procedure was published; in summary:

- Everybody on the local plan contacts database was notified;
- All documents were available to view electronically at the Council’s main Office and libraries;
- Library staff were contacted via e-mail;
- Press advert issued alongside various press releases;
- Headline news/article on the Council’s website, including a short video animation (see below);
- A social media campaign was launched;
- A short video/animation was produced summarising the local plan in a series of short and non-technical infographics;
- Flyers were circulated to key locations, such as libraries and the Civic Office reception;
- Officer attendance at meetings.

**Publication (Regulation 19) - Main Issues raised pursuant to Regulation 20**

3.60 By the close of Publication, the Council had received a total of 228 responses which were inputted into the Council’s database (IDOX Uniform) and originally broken down and inputted as a total of 1,297 comments in total. Officers reviewed the Representations and prepared summaries and initial responses to the matters raised. As part of this exercise, it was clear that some of the comments were not considered as being the key part of the Representation itself in terms of the local plan and its policies. Such comments included the following type:

- Executive summaries (useful summary but duplicative of the detail contained in the main body of the rep itself so already summarised);
- Introductions (i.e. an agent acting on behalf of a client and setting out context to them both);
- National and local planning policy context (i.e. quoting the tests of soundness, other parts of NPPF, and/or summarising the current national/local planning policy framework);
- Conclusions (i.e. a summary of the issues already considered and set out through the main body of the rep);
3.61 In the interests of focus and brevity, these sort of comments have been removed from the main summary of the Representations, but full copies of the Representations have also been made available for completeness (see Examination Library Document Reference CSD11). This has also been done to allow the Council to produce a summary of the Representations in document/policy and customer reference order. It should also be noted that numerous Representations have been submitted with supporting reports and appendices, such as site assessment/advocacy documents, which include large volumes of information that IDOX Uniform is unable to process as the database is a text only format (such as photographs, maps, tables, charts etc) so the original Representation(s) are required for referencing such material (and the summaries should make clear where such has been provided).

3.62 Once the above has been taken into account, the Council consider that there has been around 1,157 Representations to the Publication version of the plan; the following section summarises the main issues raised through these in local plan document/chapter order and Appendix 2 provides a link to more detail.

**Duty to Cooperate**

3.63 There were a number of Representations received in respect to the ongoing Duty-to-Cooperate and Statement of Common Ground (SoCG). The separate Statement of Compliance (see Examination Library Document Reference CSD12) and Statement of Common Ground (see Examination Library Document Reference CSD13) provides further detail on these. By way of a very brief summary, the Statement of Compliance sets out how the Council has complied with the duty to cooperate through the following:

- A summary of strategic matters/issues included in the Doncaster Local Plan SoCG;
- How those matters have been resolved/not resolved;
- Who we have worked with and on which strategic matters;
- The nature and timing of the engagement;
- The outcomes of the cooperation including how the Local Plan/Doncaster SoCG was influenced; and,
- The relationship with the Sheffield City Region SoCG.

3.64 The Doncaster Local Plan: SoCG is a separate document which follows the Planning Advisory Service guidance and sets out:

- The duty to cooperate requirements;
- The parties involved in the SoCG;
- The signatories who have signed up to the SoCG;
- Doncaster's strategic geography
- The relevant strategic matters; and
- The timetable for review and on-going cooperation.
3.65 The Doncaster Local Plan: SoCG contains 19 Agreements which have been drawn up in conjunction with the relevant neighbouring authorities and prescribed bodies. These cover relevant strategic matters including: housing; gypsies, travellers and travelling show people; employment; transport infrastructure (road, rail and public transport); air quality and noise; retail and town centres; flood risk; green infrastructure; built and historic environment; waste management; community facilities; water quality; and, minerals. These Agreements have been signed up to (or are in the process of being signed up to) by the relevant neighbouring authorities and prescribed bodies. It is not considered that there are any issues in respect to compliance with the Duty to Cooperate. Bassetlaw District Council (Agreement Number 8) and East Riding of Yorkshire Council (Agreement Number 19.1-19.7) have made Representations to Policy 13 (Strategic Transport Network) and Policy 62 (Providing for and Safeguarding Minerals Resources) respectively which are summarised and responded to in more detail below.

Representations from:
- Selby District Council (0002)
- Rotherham MBC (0003)
- Barnsley MBC (0006)
- East Riding of Yorkshire Council (0009)
- North Lincolnshire Council (0012)
- Environment Agency (0014)
- South Yorkshire Passenger Transport Executive (0112)
- Sheffield City Council (01942)
- City Of Wakefield Metropolitan District Council (0293)
- Highways England (03631)
- North Yorkshire County Council (05170)
- East Midlands Aggregate Working Party (05313)
- Marine Management Organisation (05314)
- Sheffield City Region (0820)

**General Support Overall to the Local Plan**

3.66 There was general support to the local plan and its policies from a number of the Representations.

**Council’s response:** Support welcomed.

Supporting Representations from:
- Sport England (03933)
- Sheffield City Region (0820)
- Wakefield Council (0293)
- Tickhill Town Council (0213)
- Edenthorpe Parish Council (0220)
- Blaxton Parish Council (0271)
- John Burley Investments Ltd (05299)
Chapter 3: Our Vision for the Future

Vision & Objectives

3.67 There were 29 Representations to the plan’s Vision and/or Objectives (some making multiple comments) and most are generally supporting. UK Onshore Oil & Gas and IGas Energy PLC state that onshore oil and gas can make positive contributions to the vision and these objectives. Some landowners and developers, although supportive, felt that the overall strategy and subsequent policies in the plan would not deliver the vision’s aspiration. Therefore the vision needs to be better aligned to match housing with economic growth aspirations. Some also added that there should be no prioritisation of using Brownfield over Greenfield land in terms of the plan’s objectives. The Airport operators are supporting but also call for specific reference to the Airport in the vision. Frickley and Warmsworth Estate request greater recognition of the rural nature of the borough and need to develop in smaller communities.

Council’s response: These comments are noted, however they mainly relate more to the spatial strategy and subsequent local plan policies as opposed to requesting any real changes to the vision and objectives themselves. Objective 4 is considered to be in line with NPPF and the plan includes both Brownfield and Greenfield sites. In terms of the Airport, there is no proposed change to the vision and objectives to make them more specific to one business. The Local Plan supports the sustainable growth of Doncaster Sheffield Airport in key proposals and with a policy in the Local Plan. In terms of the Frickley & Warmsworth Estate, these serve as a 'hook' to hang the policies on. The Local Plan settlement hierarchy identifies suitable locations for development including the main urban area, main towns and service towns & villages, and defined villages in rural locations. Smaller villages (in rural locations) also have opportunities for small-scale development where appropriate.

Proposed Changes: None

Supporting Representations from:
Anglian Water Services Ltd (0031)
Severn Trent water Ltd (04496)
Historic England (0016)
The Home Builders Federation (0129)
The Joint Rural Parishes (04013)
Polypipe Building Products (05285 & 05311)

Objecting Representations from:
The Gascoine Group Ltd (04430)
Wilson & McKay Families (05172)
Metacre Ltd (05173 & 05174)
Peter Kelly, Graham White, Paul Pennington, Stewart Oades (05310)
The Strategic Land Group (04444)
Chapter 4: Strategic Approach

Policy 1: Presumption in Favour of Sustainable Development

3.68 There were 12 Representations to the policy and all are mostly supportive. However, some developers and landowners object to Parts B & C of the policy as being unnecessary as they do not accord with the plan in that the presumption 'being subject to material considerations where proposals accord with policies in the Plan' and therefore should be deleted. Some also object to the reference to Neighbourhood Plans at Part B as the Council may need to override such plans to strive for sustainable development in line with NPPF para 30. Highways England conclude that Part B should make reference to the need to consult with statutory consultees in respect to planning applications. IGas Energy PLC are supporting but the policy must recognise the contribution that hydrocarbons make towards a zero carbon economy and plan positively for hydrocarbons during plan period.

Council’s response: The general support is welcomed. It is not proposed to accept the changes as requested. National Planning Practice Guidance requires Local Plans to set out how they will apply the presumption in favour of sustainable development locally. When read in conjunction with NPPG para 11, Policy 1 sets out the key principles as to how it will do this. In respect to the reference to Neighbourhood Plans, both the Local Plan and NPPF policy are to be read together and there is no need to duplicate the wording of NPPF para 30 in Policy 1. There is no need to refer to consulting with statutory consultees in the policy wording or supporting text. As a statutory requirement this is required irrespective of the wording of any Local plan policy. National policy makes clear the connection between hydrocarbons contribution towards a zero carbon economy.

Proposed Changes: None

Supporting Representations from:
Gladman Developments Ltd (02989)
KCS Developments Ltd (05319)
Harworth Group (05190)
Polypipe Building Products (05285 & 05311)
United Kingdom Onshore Oil and Gas (05014)
Objecting Representations from:
Highways England (03631)
Barratt & David Wilson Homes (04955 & 04956)
Mr Philip Lodge (05008)
Miller Homes (05288)
IGas Energy PLC (05129)

Policy 2: Spatial Strategy & Settlement Hierarchy

3.69 There were 77 Representations received to this policy, with some making multiple responses raising several issues.

Overall Strategy

3.70 The Environment Agency welcome reference to appropriate locations and the explanatory text in relation to flood risk. Historic England support the policy as sound but request a modification to reflect that whilst there are clear advantages to directing proportionately more growth to the larger and more sustainable towns and villages, the scale of growth proposed for each settlement must be compatible with safeguarding its character and landscape setting. The Home Builders Federation expect the spatial distribution of sites to follow a logical hierarchy, provide an appropriate development pattern and support sustainable development within all market areas. KCS Developments Ltd supports distribution of new allocations on a pro-rata basis to the most sustainable locations taking a sequential approach to avoidance of flood risk so long as the flood zones are accurate and up-to-date.

3.71 Warde-Aldam Estates, Countryside Properties, Miller Homes, and John Burley Investments Ltd support the spatial strategy and overall settlement hierarchy as being sound. Miller Homes however are concerned that some of the housing allocations identified in the plan are undeliverable so the strategy will not be achieved. Mr Ian Murray supports Askern’s identification as a Service Town, but objects to the Main Urban Area being the main focus for growth. The Joint Rural Parishes support the spatial strategy and hierarchy in principle but feel the land requirements may be over inflated and will need to be reviewed regularly.

3.72 Peel Land & Property Management Ltd contend that there is a need to refer to the full proposition at the Airport to be consistent with Policy 7 and show that, despite sitting outside the settlement hierarchy, it is nevertheless an integral part of the plan in terms of development needs, economic growth and spatial distribution of growth.

3.73 CPRE object to the failure of the strategy to address climate change and that the policy itself does not make specific reference to climate change. The Strategic Land Group and Mr & Mrs Hall object on the basis that the spatial strategy is not justified by evidence and is unsound. They conclude that it is unclear whether the
overall percentage distribution to the tiers have been influenced by seeking to minimise Green Belt or solely on the sustainability and size of settlements.

3.74 The Gascoine Group Ltd, Wilson & McKay Families, Metacre Ltd, and, Peter Kelly, Graham White, Paul Pennington & Stewart Oates also state that the strategy and hierarchy is not justified or effective and places too much growth to the Main Urban Area over other settlements and especially the Service Towns/Villages (Bawtry, Tickhill & Carcroft-Skellow). They object to just using population and economy to determine distribution as it takes no account of other factors such as affordable housing need, deliverability or development opportunities. To deliver much needed affordable housing it is recommended that an increased percentage of housing be allocated to lower tier settlements e.g. Service Towns/Villages.

3.75 Barratt & David Wilson Homes also object to the focus on Main Urban Area and Main Towns and state that more housing should be directed to the Service Towns/Villages. They argue that there are deliverability issues with sites and the Council has consistently been unable to demonstrate a 5YHLS and that this is due to the settlement hierarchy which therefore needs reconsideration.

3.76 Strata Homes Yorkshire Ltd, Mr Paul Burtwistle, Framecourt Homes, Avant Homes Ltd, Priority Space Ltd, and Firsure also argue that the distribution of housing should be reviewed to include more growth to the Service Towns/Villages and also to the Defined Villages. It is also considered that some of the Main Towns should receive a greater share to reflect their assets/strengths, being: Rossington (Location adjacent to lport/M18 corridor/Airport and all the recent infrastructure investment that’s gone into this location); and, Thorne-Moorends (location, regeneration ambitions connected to employment parks and level of facilities locally available). It is also considered that Carcroft-Skellow should be identified as a Main Town (close to employment parks and close to the A1(M)). There are also objections to the identification of Reserve Sites in the plan as they are not suitable for such a title.

3.77 Gladman Developments Ltd state that the policy should recognise that the Main Urban Area of Doncaster is constrained by Green Belt, flooding and in part by the M18 and A1(M) Motorways and numerous railways. It is therefore suggested that sufficient flexibility is established in this and any related policy to ensure delivery of the identified overall housing target set out in Policy 3 is not compromised by a stringent adherence to the settlement hierarchy and defined distribution of growth. If the Council intend to proceed with the spatial distribution set out in this consultation, the wording of the policy should be amended to read 'approximately 50% of new housing' instead of 'at least 50% of new housing'.

3.78 Minerals Investments Ltd object to no growth to the Defined Villages (Highfields) and in particular no support to the allocation of Brodsworth Quarry site. One individual (Daniel Meekin) contends that the spread of housing allocation should be more dispersed with too much directed to Barnby Dun, Hatfield-Stainforth, Thorne, and Edenthorpe-Kirk Sandall areas. A new village should be considered
instead of sprawling villages continuously. Housing puts strains on infrastructure such as schools, GPs, dentists. He concludes that there is too much emphasis on growth which is not supported by communities and that Brownfield sites should come forward before open countryside.

**Council’s response:** Historic England’s request for reference to safeguarding character landscape setting of settlements is not considered necessary as such matters, alongside a whole host of other spatial planning objectives, are considered through the Sustainability Appraisal process in terms of both quantum’s and distribution of development and then individual sites. In respect to Miller Homes concern, the Local Plan seeks to allocate sites (including those with permission) which are deliverable. Deliverability is looked at through the HELAA as well as the '5 year Deliverable Housing Land supply Statement' and Housing Topic Paper.

Additional explanatory text is proposed to make clear that the Airport proposals as per Policy 7 are an important part of the local plan, despite sitting outside of the settlement strategy and hierarchy. In terms of CPRE’s objection, addressing climate change is a theme that runs throughout the plan. In response to the Strategic Land Group & Mr & Mrs Hall, the strategy approach was explained in both the Settlement Background Paper in 2018, and the Housing Background Paper and Green Belt Topic Paper for the 2019 consultation, and is now further covered in the Housing Topic Paper. These documents show this to be both sound and justified, being in accordance with consultation on the settlement strategy. In response to the Gascoine Group Ltd, Wilson & McKay Families, Metacre Ltd, and, Peter Kelly, Graham White, Paul Pennington & Stewart Oates, sustainability has been considered when defining the housing required in each settlement and tier, and the Settlement Audit was undertaken early in the plan process and updated since to assess the sustainability of settlements. It is considered that the settlement housing targets are reasonable and proportionate given their size and service provision.

Policy 8 seeks to deliver affordable housing and provides for appropriate levels to high and low value areas. It is not considered reasonable to increase the housing requirement to provide higher levels of affordable housing. In respect to Barratt & David Wilson Homes additional comment about 5YHLS, the Council has always demonstrated an up-to-date 5YHLS and this has been upheld on Appeal (including Secretary of State decision) so it is not clear why the Representation states this. In response to Strata Homes Yorkshire Ltd, Mr Paul Burtwistle, Framecourt Homes, Avant Homes Ltd, Priority Space Ltd, and Firsure, the approach to the distribution of housing is explained in the Housing Topic Paper. The approach allocates housing to the most sustainable locations, including economic growth to the more sustainable Main Urban Area and Main Towns, but does provide opportunities for some limited development in smaller localities to support these rural areas. A response to Reserve Site objections has been picked up as part of Policy 6: Housing Allocations. In terms of the Gladman Development Ltd and Minerals Investments Ltd comments, the Local Plan proposes an appropriate strategy that steers development to the most sustainable locations taking into account Green Belt and existing countryside.
designations. In respect to Daniel Meekin’s comments, the settlement hierarchy has been subject to several rounds of consultation and evidenced in the documents set out above. The ‘new town’ approach was considered through early consultation but was a rejected option as set out in the consultation documents.

Proposed Changes: No

Supporting Representations from:
Environment Agency (0014)
Home Builders Federation (0129)
KCS Developments Ltd (05319)
Miller Homes (05288)
Warde-Aldam Estates (04706; 04707; 04708 & 04709)
Countryside Properties (05256)
John Burley Investments Ltd (05299)
Joint Rural Parishes (04013)

Objecting Representations from:
Peel Land & Property Management Ltd (04288)
CPRE (0077)
Historic England (0016)
Strategic Land Group (04444)
Mr & Mrs Hall (04960)
The Gascoine Group Ltd (04430)
Wilson & McKay Families (05172)
Metacre Ltd (05173 & 05174)
Peter Kelly, Graham White, Paul Pennington & Stewart Oates (05310)
Barratt & David Wilson Homes (04955 & 04956)
Strata Homes Yorkshire Ltd (02073)
Mr Paul Burtwistle (03506 & 03507)
Framecourt Homes (05176)
Avant Homes Ltd (05208, 05209 & 05210)
Priority Space Ltd (05213)
Firsure (05215)
Gladman Developments Ltd (02989)
Minerals Investments Ltd (03116)
Mr Ian Murray (05309)
Daniel Meekin (04517)

**Doncaster Main Urban Area**

3.79 Theakston Estates Ltd support the Main Urban Area as the focus for growth but object to the 50% share of housing which should be higher (64%) in line with the Core Strategy. Completions in recent years for the settlement have not met the target so needs a step change or the plan will fail to meet its objective of providing the majority of new housing to this tier of the hierarchy.
Council’s response: The Local Plan replaces the Core Strategy and has consulted on a new approach to the spatial strategy and distribution. The Main focus for growth is still the Main Urban Area but other sustainable locations will get some housing based on their existing households and service provision. 50% Main Urban Area growth does not put undue pressure on smaller locations, rather provides the opportunities for local needs to be met locally. The plan is allocating 7,211 units in the Main Urban Area (years 2018 - 2033), which is 54.5% of the overall 15 year allocated requirement for this period. This location is therefore delivering the majority of new homes here, as set out in the strategy.

Proposed Changes: None

Objecting Representations from:
Theakston Estates Ltd (01937)

Main Towns

3.80 Mr D Parkinson & Barmston (Thorne) Ltd supports the Spatial Strategy which has a focus on the defined 'Main Towns' such as Thorne-Moorends, as well as those areas that are attractive to the market and with good access to the Strategic Transport Network. Particular support is given to focusing employment sites within accessible and attractive market locations which is necessary to ensure that the spatial strategy is effective and deliverable. The Harworth Group also welcomes the policy approach which aligns with the settlement hierarchy and the presumption in favour of sustainable development. The inclusion of Thorne as a Main Town is supported, as is the strategy of focussing new development to these towns and key transport corridors. Mr R.J. Ogley supports the identification of Conisbrough-Denby as a Main Town and notes the allocation of land in his ownership will help deliver the settlements target. Mr Philip Lodge supports the identification of Armthorpe as a Main Town, but has fundamental concerns over the strategic approach and its evidence base. Tanks & Vessels Industries Ltd support the identification of Rossington as a Main Town and conclude that Policy 2 is sound. Rossington Hall Investments Ltd generally support settlement hierarchy but consider that Rossington should be a focus for a larger proportion of housing development than currently proposed and the site South of Grange Road should be allocated or safeguarded for housing development to reflect this position/potential.

Council’s response: General support to identification of these settlements as Main Towns welcomed. In terms of Rossington Hall Investments Ltd comments, the spatial strategy has been developed through several rounds of consultation. Approaches to more dispersal/greater concentration/current Core Strategy approach etc. were all options that were considered and subject to SA. A Settlement Background Paper was published alongside the Publication Plan (and previous 2018 consultation) setting out more details and has been updated and republished as a Topic Paper for Submission. There has been various competing calls throughout the
process for different settlements to have a "bigger slice of the cake" but none of them are considered to amount to a more justified or coherent strategy than what has been proposed. It is not considered there are exceptional circumstances to allocate sites into the Green Belt at Rossington when its housing requirement for the plan period (and beyond) has been identified through non-Green Belt supply. See Green Belt section below for response to safeguarded land.

Proposed Changes: None

Supporting Representations from:
Mr D Parkinson & Barmston (Thorne) Ltd (05293)
Harworth Group (05190)
Mr R.J. Ogley (03008)
Tanks & Vessels Industries Ltd (05198)

Objecting Representations from:
Mr Philip Lodge (05008)
Rossington Hall Investments Ltd (04297)

**Service Towns/Villages**

3.81 Mr Turnbull & Crowe, Platts, Lodge, Hanson & Youdan object to only local needs housing being directed to this tier of settlements given they are sustainable locations so should also receive a share of the economic-led housing growth. The Strategic Land Group object to the joining of Auckley with Hayfield Green as a single Service Village as this has not been justified and is inconsistent with how other settlements have been grouped or left as one. Auckley itself has sufficient service provision to be a Service Village in its own right. Sprotbrough & Cusworth Parish Council object to separating Sprotbrough into 2 settlements (the ‘village’ and the main urban area ‘half’) as this does not reflect the Neighbourhood Plan and has resulted in the inevitable need for a Green Belt allocation to the village which is objected to as there are no exceptional circumstances. Marr Parish Council also objects to Green Belt allocations at Sprotbrough Village and Barnburgh & Harlington as these were previously proposed as Defined Villages in the 2018 consultation and the former is in conflict with the Neighbourhood Plan and the latter has not considered flood risk issues with the site. Service provision in these settlements is insufficient and the plan has still not set out how such issues are going to be addressed.

**Council’s response:** See response to ‘overall approach’ above for comments in respect to why economic-led housing growth has not been directed to the Service Towns/Villages. In terms of the Strategic Land Group’s comments, the Settlement Audit assesses these individually due to using Community Profile Areas to assess service provision - which are often on a smaller scale to the actual proposed settlements, however these are then combined where necessary to show the proposed overall area. This is also the case in other settlements, including the Main
Urban Area, Barnburgh and Harlington. Throughout the Local Plan, Auckley and Hayfield Green have always been proposed as one settlement, and this is reflective of the Parish (and the Neighbourhood Plan area) which includes both areas. In terms of Sprotbrough & Cusworth and Marr Parish Councils, the current development plan (and indeed emerging local plan) has always differentiated between the village of Sprotbrough to the west of the A1(M) as a separate settlement to that to the east of the A1(M) which forms part of the Doncaster Main Urban Area. The 2 settlements are separated by Green Belt. As the representation notes, the only thing that has changed is that a larger range of the Villages in Doncaster are now being proposed for an allocation compared to the current Development Plan; this was subject to early consultation through the Issues & Options and Homes & Settlements stage. Exceptional circumstances are set out in the Green Belt Topic paper and NPPF is clear that Green Belt boundaries can be changed through the preparation (or review) of a local plan. The site selection methodology has also considered Green Belt and flood risk constraints. Both settlements were identified as Service Villages throughout the local plan consultation, including in both 2016 and 2018 consultations and were identified in line with the settlement audit and service level provision.

Proposed Changes: None

Objecting Representations from:
The Strategic Land Group (04444)
Mr Turnbull (03259)
Crowe, Platts, Lodge, Hanson & Youdan (05187)
Sprotbrough & Cusworth Parish Council (0257)
Marr Parish Council (0746)

**Defined Villages**

3.82 The Frickley & Warmsworth Estate support the identification of Clayton as a Defined Village in principle but state that Policy 2 allows an extension to a Defined Village but does not go far enough to support rural communities and the settlements in which growth will be supported is more limited than the policy suggests. The text in Policy 2 is misleading as it appears that Policy 3 only supports development in 14 of the 40 defined villages and Clayton is not one of the listed villages where development is supported, despite the settlement’s proximity to Thurnscoe, which has a range of services and a train station. The Joint Rural Parishes seek clarification on where Green Lane and Brodsworth are located in the hierarchy. Also, agree that, in order to make communities sustainable, some appropriate development may be required in villages and countryside and welcomes the statement of community involvement in any development but no development, other than small scale infill should be permitted. The statement in respect to non-residential development being supported needs further clarification. Marr Parish Council and Cadeby Parish Council both, respectively, feel that the villages of Marr and Cadeby should be washed over with Green Belt as per proposals consulted on in 2018. Bellway Homes object to
Branton’s status in the hierarchy and that no allocation for housing (and thus no affordable housing) are being made having carried out their own Housing Market Needs Assessment for the village resulting in a negative impact on the vitality of the Village, including its services and facilities, contrary to the guidance presented in Para 78 of the NPPF; they also argue that Branton is comparable in service provision compared to other Service Villages.

Council response: In terms of Frickley & Warmsworth Estate comments, Policy 2 supports the extension of villages in the Countryside in certain circumstances. However for settlements in the Green Belt (such as Clayton) national policy will be applied and this is explained in the Policy and explanatory text. Green Lane, in line with the current development plan, is washed over with Green Belt and Brodsworth identified as a Defined Village. In Defined Villages, development will be supported "subject to other policies in the Plan". The reference to supporting a prosperous rural economy is a reference to NPPF policy (primarily para 83) which is not repeated in the Local Plan to avoid unnecessary duplication - but this does represent the clarification sought. The Parish Councils are right to note that it was proposed to include all Defined Villages in the Green Belt as ‘washed over’ Green Belt settlements. However, as explained in the Green Belt and Housing Topic Papers, this is no longer proposed as it is considered that exceptional circumstances for this cannot be justified. Branton is proposed as a Defined Village so has not received any subsequent allocations as the Representation notes. Policy 3 does however identify Branton (being one of the Larger Defined Villages adjacent to the Countryside so not Green Belt) as having scope for schemes of up to 20 dwellings (0.8ha) to a cumulative growth limit of 70 dwellings which is the highest of the Defined Villages totals. The policy, alongside appropriate development within current development limits, provides opportunity for new housing, including the housing needed to meet local needs. National policy also allows for entry level exception sites to such locations in the Borough.

Proposed Changes: None

Objecting Representations from:
Frickley & Warmsworth Estate (05312)
Bellway Homes (05175)
Cadeby Parish Council (0739)
Marr Parish Council (0746)

Countryside

3.83 CPRE object on the basis that this is not positive to ensure that new development is consistent with the rest of the settlement strategy and worrying that the majority of the policy is in respect to what exceptions can be made for development in the Countryside. The 5YHLS could be open to abuse by developers who may withhold urban sites and the policy creates incentives for challenges to
5YHLS by the industry and undermine other policies in the plan. Peel Land & Property Management Ltd state that the policy could lead to a stream of unplanned sporadically located and speculative applications in less sustainable locations. In the first instance in such cases, delivery should be directed to the Airport ahead of any sporadic incursion into the countryside. Warde-Aldham Estates, Hallam Land Management, Don Parkinson Partnership and Swan Homes Ltd object stating that this policy should also apply to the Defined Villages and not just the top 3 tiers of the hierarchy as NPPF supports development in sustainable locations. Criterion 5E does not comply with NPPF as does not require lack of 5YHLS to support development in the countryside. Must be able to demonstrate a 5YHLS at all times and waiting until this cannot be shown before releasing sites is not positive and should be deleted. There is tension between part 5 of Policy 2 and Policy 26 in that they set out different requirements for development in the countryside but lack clarity in the consideration of edge of settlement sites and those located in isolated locations. BBS Doncaster Ltd also state that the policy approach to the Countryside is overly restrictive and beyond that supported by NPPF. Warde-Aldham Estates also object to the definition of appropriate development as being overly prescriptive and suggest it’s replaced with “The development of a relatively small gap between existing buildings” and that each site should be considered on its own individual merits. Barratt & David Wilson Homes objects in respect to the support of development for none allocated sites within settlement boundaries. They feels that this negatively worded and will restrict development. They also object to the exceptional circumstances being reliant on 'community support' and conclude that decisions should be made against adopted planning policy and material planning considerations and not influence or based on community support.

Council’s response: In terms of CPRE’s objection, it is the intention of countryside policies to specify what is acceptable development in the countryside, but this does not mean the intention is to erode this. The countryside is strongly protected in the plan, but a differentiation has to be identified. NPPF para. 78 requires the promotion of sustainable development in the countryside. In the event of the lack of a 5YHLS, such sites would inevitably come under pressure in any event. Criterion 5E is considered appropriate in the context of an up-to-date local plan with sufficient allocations being made for the plan period with numerous sources of additional housing supply and the government’s emphasis on having a plan-led approach. That said, should circumstances change during the plan period then the policy provides flexibility to bring forward a further source of supply and will assist ensuring that any such proposals come forward with some policy to help bring forward sustainable extensions to settlements with a Countryside boundary. It is not considered that there is a tension between Part 5 of this policy and Policy 26 (Countryside). The policy as drafted is considered to be positive and in line with NPPF and the need to balance supporting rural uses and the vitality of smaller settlements in the countryside with channelling development to sustainable locations in line with wider spatial planning objectives. The Local Plan does not intend to repeat national planning policy. In terms of Warde-Aldham Estates comment, the current wording
aims to be offer clarity and certainty. It is important not to have inappropriate development which is of an appropriate scale and nature and in keeping with the core shape, form and size of the settlement. In response to Barratt & David Wilson Homes, it is not considered the part of the policy referring to additional development on non-allocated sites is negatively worded and other policies (e.g. Policy 5/11) will apply which provide more detail depending on the proposal. If the policy is respect to community support is adopted through the Local Plan then it will form part of the development plan by which any application (where relevant) will be assessed.

Proposed Changes: No

Objecting Representations from:
CPRE (0077)
Peel Land & Property Management Ltd (04288)
Warde-Aldam Estates (04706; 04707; 04708 & 04709)
Barratt & David Wilson Homes (04955 & 04956)
Hallam Land Management (05212)
Don Parkinson Partnership (05294, 05295, 05296 & 05297)
Swan Homes Ltd (05291)
BBS Doncaster Ltd (04950)

**Green Belt**

3.84 Polypipe Buildings Products object on the basis that the plan has failed to consider whether exceptional circumstances exist to protect existing established employment sites and enable people access to jobs locally. A review of the Green Belt is required to consider the potential for new and expanded employment sites in the west of the borough to reflect and support the housing strategy. 360 Degree Media contend that their site is of such importance in terms of national and regional significance and the associated economic benefits that this part of the policy should make reference to its redevelopment for media uses. Strata Homes Yorkshire Ltd, Mr Paul Burtwistle, Framecourt Homes, Avant Homes Ltd, Priority Space Ltd, and Firsure object that boundaries have been drawn too tightly around settlements and therefore it is likely that they will need to be redrawn through the next review of the plan and objects that there is no Green Belt Safeguarded land identified across the hierarchy. Persimmon Homes Yorkshire Ltd also objects to the lack of safeguarded land, in particular though between the Main Urban Area and Green Belt. The Green Belt Topic Paper provides some justification but does not provide sufficient evidence that Green Belt boundaries will not need to be altered at the end of the Plan period. Rossington Hall Investments Ltd also object to no safeguarded land at Rossington. Messers Cooper objects to the Green Belt boundary which is drawn tightly around Manor Farm, Braithwell, and fails to include the existing farm buildings on the western side and access into the site. A J Atkinson & Sons also object to Manor Farm, Marr (Ref: 197) being shown as Green Belt and should be amended in accordance with the recent residential permission. CPRE maintain there is a need to
extend the Green Belt to the east of the borough in line with previous campaigns to avoid settlements from coalescing.

**Council’s response:** In response to Polypipe Building Products, the Green Belt Topic Paper explains why there are no employment allocations within the Green Belt at this time i.e. it is considered that there are currently no exceptional circumstances. The explanatory text of Local Plan Policy 3 also explains that there is access to business parks across the border in Rotherham. These can be accessed using strong public transport links and road connectivity. In terms of 360 Degree Media, the scale of development being proposed at High Melton and the nature and extent of existing buildings do not warrant a specific designation and any application can be addressed through current policy. In respect to the drawing of Green Belt boundaries and Safeguarded land, the approach to Green Belt, including the decision not to safeguard land, is discussed in the Green Belt Topic Paper. NPPF states boundaries should be clearly defined and not include land which is unnecessary to keep permanently open and that boundaries should be drawn using readily recognisable features. NPPF para 139c is clear that it must be “necessary” to identify safeguarded land and the Green Belt Topic paper provides sufficient justification why it may not be necessary. In terms of the Manor Farm, Braithwell objection, it is not considered that there are exceptional circumstances identified to justify changes to the Green Belt boundary. National policy allows for redevelopment and extension/alteration to existing buildings in the Green Belt subject to certain conditions. In terms of A J Atkinson & Sons, there are no exceptional circumstances to warrant amendment to the Green Belt boundary at Manor Farm, Marr.

Proposed Changes: None

Objecting Representations from:
Polypipe Building Products (05282 & 05311)
360 Degree Media (05307)
Persimmon Homes Yorkshire Ltd (03431; 05289 & 05290)
Rossington Hall Investments Ltd (04297)
Strata Homes Yorkshire Ltd (02073)
Mr Paul Burtwistle (03506 & 03507)
Framecourt Homes (05176)
Avant Homes Ltd (05208, 05209 & 05210)
Priority Space Ltd (05213)
Firsure (05215)
Messers Cooper (05188)
A J Atkinson & Sons (05284)
CPRE (0077)
**Flood Risk**

3.85 Severn Trent Water Ltd believe the explanatory text at para 4.17 is open to interpretation and needs rewording to “opportunities to reduce the causes and impacts of flooding through new development should be sought”.

**Council’s response:** The wording at para 4.17 is in line with NPPF.

Proposed Changes: None

Objecting Representations from:
Severn Trent Water Ltd (04496)

**Development Limits**

3.86 Warde-Aldam Estates, Gladman Developments Ltd and Persimmon Homes Yorkshire Ltd object to the use of drawing tight development limits around sustainable settlements where this provides no flexibility in line with the presumption in favour of sustainable development. It leads to an approach whereby countryside policies are brought forward that are more akin to the outdated national policy approach to protect the countryside for its own sake. Mr K Honcherenko objects to the development limit at Finningley and for not including land in his ownership (Ref: 315) within the development limit and no longer designated as Countryside therefore. Mr Turnbull objects to greenfield housing allocation (Ref: 164/430) not being included within development limits; should be included and part 1 of the policy amended accordingly. Hallam Land Management also seek inclusion of their allocation (Site Ref: 970) within the development limits.

**Council’s response:** The Development Limits methodology was subject to previous consultation (2018) and re-published alongside the Publication version of the plan. It has always proposed that greenfield urban extension allocations should be excluded from development limits, but would be incorporated when the permission/development has been implemented through a future review of the plan. This is a logical approach, especially so for larger allocations where development will include not just housing but other non-urban uses which may still remain outside of development limits depending on final layouts e.g., landscaping, public open space, balancing ponds etc. Development limits have been identified to allow the identification of rational and robust boundaries which for the application of "Countryside" policy and identification of settlement boundaries within which development is prioritised. This supports the plan led approach to development.

Proposed Changes: None

Objecting Representations from:
Warde-Aldam Estates (04706; 04707; 04708 & 04709)
Gladman Development Ltd (02989)
Persimmon Homes Yorkshire Ltd (03431; 05289 & 05290)
Policy 3: Level & Distribution of Growth

There were 100 Representations received to this policy with some making multiple comments.

General Support – Employment Land Requirement

Blue Anchor Leisure Ltd support that the plan should facilitate the delivery of at least 481 ha of employment land over the plan period. Their own report demonstrates that the 481 hectares is based on jobs growth of 1% p.a. This is consistent with past trends in Doncaster and the Sheffield City Region’s growth aspirations. The target uses the same jobs growth assumptions as the housing-based assessment and therefore represents a joined-up approach. The report also finds that the breakdown between use classes estimated in the ELNA is broadly in line with past trends and is therefore sound. It is considered that the employment land requirement in Policy 3 is sound and there is no justification for a lower land target. Mr D Parkinson & Barmston (Thorne) Ltd also support the requirement to deliver at least 481 ha of employment land to help grow and diversify the Sheffield City Region economy. They support the Policy approach to distribute growth to the Main Towns, including Thorne and Moorends as well as the Main Urban Area. The approach to focusing logistics, light industry and manufacturing in locations that can accommodate large buildings with good access to the motorways is also supported. These are the areas where their own Delivery Statement confirms there is market demand.

General Support – Housing Requirement & Distribution

Avant Homes and Countryside PLC are generally supportive of the policy and the contribution that their housing sites at Mexborough, Hatfield, and Doncaster Main Urban Area can make to the housing targets for these settlements. Warde-Aldam Estates note that the housing requirement should be a minimum, but overall support the approach proposed by the Council to meet at least 920 dwellings per annum due to the fact that the standard method could have implications for housing targets in some areas of the country (principally in the north of England), where economic growth strategies may not be supported by local authorities that plan for the minimum number of additional dwellings as indicated by the standard methodology. By only using the proposed methodology it could lead to the Borough not planning enough homes to support the economic growth strategy.

Council response: Support welcomed

Proposed Changes: None
Supporting Representations from:
Blue Anchor Leisure Ltd (05197)
Mr D Parkinson & Barmston (Thorne) (05293)
Avant Homes (05303; 05304 & 05305)
Countryside PLC (05306)
Warde-Aldam Estates (04706; 04707; 04708; 04709)

**Plan Period**

3.90 The Home Builder’s Federation, KCS Developments Ltd, Don Parkinson Partnership, and Theakston Estates Ltd request an extension to the plan period to allow at least 15 years minimum from adoption in line with NPPF. Some also object to confusion arising from allocations for housing for the period 2018 to 2033 rather than the end of the plan period as drafted (2035).

**Council’s response:** The up-to-date Local Development Scheme identifies potential adoption of the Local Plan in 2020. All of the baseline information in terms of land supply commences at April 2018 as this was the latest monitoring and sufficient land supply has been identified for the whole of plan period that meets the requirement.

Proposed Changes: None

Objecting Representations from:
The Home Builder’s Federation (0129)
KCS Developments Ltd (05319)
Don Parkinson Partnership (05294; 05295; 05296 & 05297)
Theakston Estates Ltd (01937)

**Employment Land Requirement – Higher than Proposed**

3.91 Marr Parish Council note that job levels being predicated, especially against a background of economic uncertainty, are very aspirational and consider such an increase is optimistic and that an annual review should be carried out to ensure that the borough's new job creation meets with its new homes target. Westmoor Holdings object stating that the land requirement is too low and the Plan has not therefore been positively prepared. The employment land take up in the last three years has been significant and the requirement needs to be increased. Harworth Group support the proposed delivery of at least 481 ha of employment land over the plan period at locations along the M18/M180 motorways and strategic road network to grow and diverse the economy, increase productivity and widen access to learning and training opportunities. This equates to 24 ha per annum over 20 year period while the ELNA (2019 update) states that the net land take up for the 4 year period (between 2015-2018) shows an average of 29.75ha per annum. It is therefore evident that recent demand for employment land is outstripping the supply. The Council should plan for additional employment land to enable flexibility and to meet this rising demand. In order to keep up with current market occupier demand, large-
scale sites are needed to cater for larger warehouses and only 4 out of the 8 allocations could accommodate a building of over 100,000 sq ft.

Council’s response: In response to Marr Parish Council, policies will be monitored on an annual basis and there is a statutory requirement now to review local plans at least once every 5 years. Section 6 of the Employment Land Needs Assessment explains how the employment land need figure has been calculated i.e. additional factors such as competition and choice have been taken into account in the final figure. There is no need therefore for additional land to be provided. The Economic Forecasts and Housing Needs Assessment suggests that 193 ha is a starting point for the employment land requirement. The Council’s Employment Land Need Assessment methodology increases this to 481 ha which is considered realistic and ambitious. There is also a variety of sites across the borough which aims to meets differing needs and not just warehousing.

Proposed Changes: None

Supporting Representations from:
Marr Parish Council (0746)

Objecting Representations from:
Westmoor Holdings (01191)
Harworth Group (05190)

Employment Land Requirement – Needs a Buffer & Identification of Reserve Sites for Flexibility

3.92 Blue Anchor Leisure Ltd support the 481 ha employment land requirement but contend that there needs to be an additional buffer to the requirement as well as the identification of reserve sites to provide flexibility. The Local Plan provides for flexibility in the housing supply but there is no such buffer or reserve site allowance made for employment land. This is an inconsistent approach. The Site Selection Methodology refers to a number of unimplemented UDP employment allocations but it is not considered that these represent a reserve source of employment land that can be relied upon. Any allocation that is still available after 21 years is likely to have constraints and be in an unattractive location. They are also modest in size and unsuitable for anything other than localised business needs. West Moor Park East (Ref: 1031) should be identified as a reserve site if it is not allocated in the first instance. Hallam Land Management also object to their not being a buffer so risks that the requirement will not be met as it assumes every allocation/site will come forward as envisaged.

Council’s response: See response above. The Economic Forecasts and Housing Needs Assessment suggests that 193 ha is a starting point for the employment land requirement. The Council’s Employment Land Need Assessment methodology increases this to 481 ha which is considered realistic and ambitious. The sites
selected for allocation have enough capacity for an additional 60 ha that is forecast to come forward post 2035. In the event of changing circumstances there is nothing to say that the additional capacity could not come forward before 2035. So in effect that is an additional 'buffer supply'. There is also an additional supply of smaller sites (total area 37 ha) that are predominantly available plots within larger existing employment sites that are not featured as part of the 'new' supply. That gives a potential additional supply of 97 Hectares. Also, there is an addendum to the ELNA which explains this in more detail. There is no need therefore for additional land to be provided.

Proposed Changes: None

Objecting Representations from:
Hallam Land Management (05283)
Blue Anchor Leisure Ltd (05197)

**Distribution of Employment Growth & Lack of Support for Existing/Expanding Businesses/Sites**

3.93 West Moor Holdings object to the distribution of employment with the Unity Project providing sufficient land for the north of the borough and there is no demand for any more sites in this location, but there is a need for land serving the south-west quadrant of the M18. Polypipe Building Products object that there are no new employment allocations and extensions to existing employment sites in the west of the Borough. Harworth Group PLC also object and conclude that the Policy fails to satisfactorily direct light industrial, manufacturing and small scale distribution to the Main Towns, and in particular those in the west of the borough. Mr Philip Lodge also cites the need for the policy to specify a specific employment land requirement for the Main Towns in order to be positive and effective.

**Council response:** There is no evidence to suggest that land is required in the south-west of the M18 rather than the north. See response to Policy 2 and Policy 4 on this matter.

Proposed Changes: None

Objecting Representations from:
West Moor Holdings (01191)
Polypipe Building Products (05285 & 05311)
Harworth Group PLC (05203)
Mr Philip Lodge (05008)

**Housing Requirement – Neighbouring Unmet Need**

3.94 Gladman Developments Ltd state that the plan should include a mechanism which positively responds to any unmet development need from neighbouring
authorities, such as Sheffield, should those neighbouring authorities transfer a portion of their growth requirements to Doncaster via the plan-making process.

**Council’s response:** The Statement of Common Ground (SoCG) has shown that adjacent authorities are not looking to Doncaster to meet any of their identified housing requirements. It is normal that different/neighbouring/SCR Authorities are all preparing local plans to different timescales and stages. The SCR SoCG also covers such matters and commits all Authorities to plan to meet their own housing need. The Plan includes monitoring mechanisms which will inform the need to review the Plan at least every five years and update where necessary.

Proposed Changes: None

Objecting Representations from:
Gladman Developments Ltd (02989)

**Housing Requirement – Higher than proposed**

3.95 The Home Builder’s Federation and Gladman Developments Ltd state that, given the figure derived by the Standard Methodology (DMBC note - for reference these were: 585 in 2017, 572 in 2018, and 550 in 2019) and the Core Strategy requirement (1,230) it is clear that the local plan requirement must be higher than the Local Housing Need figure and the requirement must be a minimum rather than a ceiling. Mr Philip Lodge comes to a similar conclusion. The remainder of the Representations come to differing conclusions on what would be an appropriate requirement:

- **1,060dpa** - Peel Land & Property Management Ltd conclude the housing requirement should be at least 1,060dpa based on the Council’s own evidence and to support 1% per annum economic growth, but that there is potential for further growth in addition to the 1% so this is a minimum.

- **1,073dpa** - Taylor Wimpey Yorkshire and Theakston Estates Ltd object to the higher target of 920 and request the higher target of 1,073 figure which is closer to the Core Strategy, is required to deliver the SCR jobs growth set out in the PBA Report, and is closer to recent housing delivery in the Borough. Mr R.J. Ogley, Minerals Investments Ltd, Higgins Agriculture Ltd and Bellway Homes, South Yorkshire Housing Association, and Mr Ian Murray also identify the need to use the 1,073 target otherwise the Council is failing to reflect the strategic priorities and future economic potential of the SCR and further assessment of the requirement will be needed to reflect the requirements of the upcoming Strategic Economic Plan. Persimmon Homes Yorkshire Ltd, Swan Homes Ltd, and Hallam Land Management also conclude the 1,073 figure should be used (and stated as a minimum) and that it is clearly apparent that there are circumstances
identified that would require a housing figure significantly greater than the outcome of the Standard Method. The Gascoine Group Ltd, Wilson & McKay Families, Metacre Ltd, and Peter Kelly, Graham White, Paul Pennington & Stewart Oates make similar objections that the requirement should be uplifted to 1,073 as a minimum, including to address affordability issues in the borough. Barratt & David Wilson Homes also object and state that the figure should not be reduced by including a programme to bring empty homes back into use. The Strategic Land Group and Mr & Mrs S Hall make similar objections and state that Para. 4.37 of the PBA report dismisses the 1,073 figure and that this undermines the growth focussed aspirations of the Local Plan which accord with the SCR. This is contrary to NPPF para. 81 (a). It is not considered that limiting growth to the top of the range (920) is justified when there is evidence of a higher jobs led need of 1,073dpa. Failing to deliver the higher housing target means the economic strategy, in its own terms, is not deliverable and is unsound. The plan cannot therefore be positively prepared. Miller Homes also cite the need to use the 1,073 figure but to it must also be added the shortfall of nearly 3,200 dwellings from the Core Strategy plan.

• **1,100dpa** - KCS Developments Ltd conclude that a minimum net requirement of 1,100 dwellings per annum (around 6,000 units more than the local plan) should be adopted. Strata Homes Yorkshire Ltd, Mr Paul Burtwistle, Framecourt Homes, Avant Homes Ltd, Priority Space Ltd and Firsure also object and, based on their own assessment, conclude the housing requirement should be 1,100 (minimum) to ensure housing and economic growth aspirations are aligned and again recent housing delivery and ELNA support the need for a higher figure. They also have concerns that insufficient affordable housing will be provided given viability issues as thus another reason to increase the target.

• **1,230dpa** - Rossington Hall Investments Ltd object that the Core Strategy requirement (1,230dpa) is not being maintained.

**Council’s response:** As demonstrated in the Housing Topic Paper, the Local Plan is proposing an appropriate and very aspirational housing requirement that will meet the needs of Doncaster and its aspirations for growth. 920dpa is the assessed level of housing required under the revised NPPF. 1,073 refers to the figure using the previous NPPF, which is now redundant. It should also be noted that the PBA report states a mid-way point between 585 and 920 could be used, which the Council elected not to do. The Local Plan is planning for 57% more housing than the Standard Methodology proposed and in doing so the Council have taken on board national policy and guidance. The Core Strategy was prepared under previous Government’s national planning policy that pre-dated NPPF (2012) and was a non-objectively assessed housing target that was derived via the Regional Spatial Strategy which subsequent Court decisions made clear were not compliant with the
NPPF. There is no shortfall from the Core Strategy as the requirement was not objectively assessed and more recent Housing Needs Assessment takes into account housing delivery during this period so draws a line under historic delivery against such targets and factors such in accordingly. Recent housing completions have indeed exceeded the 920 target which reflects a number of sites in the pipeline and investment in infrastructure (Great Yorkshire Way, White Rose Way Duelling, etc) but such high levels of housing have not always been seen and highs and lows in terms of housing completions are cyclical. Completions data from 2004 -2018 shows that 1,000dpa net has only been exceeded on three occasions (2015/16; 2016/17 & 2017/18). There have also been years where the figure is significantly below this. On average 2004 - 2018, 679dpa have been delivered in the borough.

Proposed Changes: None

Objecting Representations from:
The Home Builder’s Federation (0129)
Gladman Developments Ltd (02989)
Mr Philip Lodge (05008)
Peel Land & Property Management Ltd (04288)
Taylor Wimpey Yorkshire (05280)
Theakston Estates Ltd (01937)
Mr R.J. Ogley (03008)
Minerals Investments Ltd (03116)
Higgins Agriculture Ltd and Bellway Homes (03467)
South Yorkshire Housing Association (05214)
Mr Ian Murray (05309)
Persimmon Homes Yorkshire Ltd (03431; 05289 & 05290)
Swan Homes Ltd (05291)
Hallam Land Management (05212 & 05283)
The Gascoine Group Ltd (04430)
Wilson & McKay Families (05172)
Metacre Ltd (05173 & 05174)
Peter Kelly, Graham White, Paul Pennington & Stewart Oates (05310)
Barratt & David Wilson Homes (04955 & 04956)
The Strategic Land Group (04444)
Mr & Mrs S Hall (04960)
Miller Homes (05288)
KCS Developments Ltd (05319)
Strata Homes Yorkshire Ltd (02073)
Mr Paul Burtwistle (03506 & 03507)
Framecourt Homes (05176)
Avant Homes Ltd (05208; 05209 & 05210)
Priority Space Ltd (05213)
Firsure (05215)
Rossington Hall Investments Ltd (04297)
No Justification for Uplift in Housing Numbers from the Standard Methodology

3.96 The CPRE argue that the plan is not positively prepared as it has failed to address UK carbon budgets through choosing to support a distribution of employment sites which are heavily dependent on road traffic. Planning for additional housing above the standard methodology which is based on unsustainable economic growth cannot therefore be justified in the context of joined up sustainable development.

Council’s response: The outcome of consultation on the preferred strategy was that jobs did not necessarily need to be located next to residential areas, and the focus is on providing employment in accessible locations that are accessible to workers. Additionally, Policy 13 deals with road network improvements that can help facilitate the strategy.

Proposed Changes: None

Objecting Representations from:
CPRE (0077)

Housing Requirement – Too High

3.97 Mr Stephen Tomlinson states that, based on the assumption of 3 people per house, 13,235 new homes over the plan period equates to population growth of 39,705 people, or an increase of 12.8% from the 308,940 residents which are reported in the 2018 State of the Borough report. The State of the Borough report actually states population will only increase by 2.7% to 2041, to 317,281 and therefore an increase of 8,341 people over 22 years. Assuming 3 people per property, only 2,780 dwellings are therefore needed to accommodate the population - far lower than 13,235.

Council’s response: The number of houses required to match and meet the requirements of the Borough’s population has been calculated and explained in the Peter Bretts Report.

Proposed Changes: None

Objecting Representations from:
Mr Stephen Tomlinson (04557)

Housing Requirement - Needs an Uplift to Reflect Actual Employment Supply Allocated

3.98 Strata Homes Yorkshire Ltd, Mr Paul Burtwistle, Framecourt Homes, Avant Homes Ltd, Priority Space Ltd object on the basis that the employment land
identified in the plan amounts to over 565ha against the policy requirement of 481ha. There is an additional circa 84ha of employment land that therefore needs an additional supply of housing as well to make sure they are aligned.

**Council’s response:** the Representations have correctly identified that the sum of the totals from the planning permissions set out in Chapter 16 (Tables E1-E8), when added to the allocations in Policy 4, amounts to 565ha. This is because the tables are incorrectly reporting a supply as at April 2015 as opposed to April 2018 (which is what the tables should be reporting as per the table titles). There are a few sites, but primarily the Iport at Rossington (79ha completed 2015-2018), which have been delivering in the first 3 years of the plan period so there is a significant difference between the April 2015 and April 2018 remaining land supply. Totalling the supply from permissions with the additional allocated supply is therefore double counting (land developed 2015-2018). The overall summary table at para 4.61 is/was correct as follows:

<table>
<thead>
<tr>
<th>Land developed 2015-2018</th>
<th>117 Hectares</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site with planning permission</td>
<td>201 Hectares</td>
</tr>
<tr>
<td>Allocated sites</td>
<td>164 Hectares</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>482 Hectares</strong></td>
</tr>
</tbody>
</table>

*Total is 1 Ha over the requirement

Given the changes are factual and in the interests of clarity and presentation, it is proposed to substitute with revised tables (i.e. Tables E1-E8) to make clearer as well as reporting April 2018 remaining land supply and not the 2015 figure (which included land developed in the first 3 years of the plan period). This is set out in the Schedule of Minor Typographical & Cartographical Amendments to the Local Plan Publication Version (Doc Ref: CSD6)

**Proposed Changes:** Minor amendments – see above as well as Doc Ref CSD6 for details

**Objecting Representations from:**
Strata Homes Yorkshire Ltd (02073)
Mr Paul Burtwistle (03506 & 03507)
Framecourt Homes (05176)
Avant Homes Ltd (05208; 05209 & 05210)
Priority Space Ltd (05213)
Firsure (05215)
**Housing Requirement – Residual Plan Period Calculation**

3.99 Mr R.J. Ogley, Minerals Investments Ltd, Higgins Agriculture Ltd and Bellway Homes, South Yorkshire Housing Association, Mr Ian Murray, and Taylor Wimpey Yorkshire object to calculating a residual requirement of 882 dpa as this will not ensure the plan period housing requirement will be met. R Crowe, G Platts, J Lodge, S Hanson, MA & JM Youndan, and Mr Turnbull also object to deducting completions and deriving at a residual requirement.

**Council’s response:** The plan period requirement is 920 net dpa. Completions first 3 years (3,400) result in the residual requirement of 882dpa - see Policy 6 for detailed breakdown on this. Completions (and over supply) contribute towards the plan period requirement the same way that there would be an expectation to include any shortfall from these years of the plan period. The residual calculation is justified.

Proposed Changes: None

Objecting Representations from:
Mr R.J. Ogley (03008)
Minerals Investments Ltd (03116)
Higgins Agriculture Ltd and Bellway Homes (03467)
South Yorkshire Housing Association (05214)
Mr Ian Murray (05309)
Taylor Wimpey Yorkshire (05280)
R Crowe, G Platts, J Lodge, S Hanson, MA & JM Youdan (05187)
Mr Turnbull (03259 & 03453)

**Housing Requirement – Allocations for Last 2 Years of the Plan Period (2033-35)**

3.100 R Crowe, G Platts, J Lodge, S Hanson, MA & JM Youndan, and Mr Turnbull object that the last 2 years of the plan period are not having specific housing allocations made. The Strategic Land Group and Mr & Mrs S Hall also object to allocations only being made for 15 years when employment allocations run to the end of the plan period.

**Council’s response:** Sources of supply for the remaining 2 years of the plan period where allocations are not being made is identified including: supply at settlements with a housing allocation above their requirement; permissions from small sites 1-4 units as at April 2018; all permissions at the Defined Villages 5+ units as at April 2018; large sites still developing in these final 2 years; any housing in line with Policy 7 at the Airport (up to 1,200 new homes); and, any housing on Reserve Sites. Policy 6 provides further detail on the total size and sources of the allocated housing requirement which is 16,115 net dwellings with completions in addition to this for the first 3 years of the plan (3,400 net units) giving a plan period housing supply of
19,515 net dwellings against a requirement of 18,400 (+1,115 units). A further 2,085 units are allocated but estimated to deliver beyond 2035.

Proposed Changes: None

Objecting Representations from:
R Crowe, G Platts, J Lodge, S Hanson, MA & JM Youdan (05187)
Mr Turnbull (03259 & 03453)
The Strategic Land Group (04444)
Mr & Mrs S Hall (04960)

**Housing Requirement – Leftover Distribution of Baseline Need**

3.101 R Crowe, G Platts, J Lodge, S Hanson, MA & JM Youdan, and Mr Turnbull object that the remaining 632 units from the baseline (Defined Villages) are being reallocated to the Main Urban Area and Main Towns and conclude the Service Towns/Villages should also receive their share.

**Council’s response:** This was the subject of early stages of consultation on the local plan (Homes & Settlements 2016) and seeks to redirect the baseline housing need from the Defined Villages where allocations are not being made in accordance with the spatial strategy and hierarchy to the most sustainable settlements which are considered as being the Main Urban Area and Main Towns.

Proposed Changes: None

Objecting Representations from:
R Crowe, G Platts, J Lodge, S Hanson, MA & JM Youdan (05187)
Mr Turnbull (03259 & 03453)

**Housing Requirement – Settlement Ranges are Difficult to Understand**

3.102 R Crowe, G Platts, J Lodge, S Hanson, MA & JM Youdan, and Mr Turnbull contend that the housing range of figures in the table for settlements in the hierarchy are difficult to match up with the overall requirements.

**Council’s response:** Policy 2, as well as settlement figures set out in Chapter 16, explains final housing allocations to each settlement.

Proposed Changes: None

Objecting Representations from:
R Crowe, G Platts, J Lodge, S Hanson, MA & JM Youdan (05187)
Mr Turnbull (03259 & 03453)
Housing Requirement – Capping Individual Settlement’s Housing Targets

3.103 Gladman Developments Ltd object to the settlement hierarchy setting caps to growth and suggest the figures set out in the policy and its associated table are clearly identified as minimums.

Council’s response: The Local Plan does have to identify a requirement and targets for individual settlements, however these are not maximum caps on development.

Proposed Changes: None

Objecting Representations from:
Gladman Developments Ltd (02989)

Housing Requirement - Expressed as a Range for 5YHLS Purposes

3.104 CPRE support such an approach as being ‘sound’. Don Parkinson Partnership, Hallam Land Management and Theakston Estates Ltd contend that this was not something that the Council previously proposed and is not considered to be sound or positive in its approach. PPG states that “Housing requirement figures identified in adopted strategic housing policies should be used for calculating the 5 year housing land supply figure where: the plan was adopted in the last 5 years; or, the strategic housing policies have been reviewed within the last 5 years and found not to need updating. In other circumstances the 5 year housing land supply will be measured against the area’s local housing need calculated using the standard method.” Once the Local Plan is adopted the Council should be applying the housing requirement which was adopted and not the standard methodology. This Policy should be revisited to ensure it is in compliance with para. 73 of the NPPF. Barratt & David Wilson Homes, The Gascoine Group Ltd, Wilson & McKay Families, Metacre Ltd, and, Peter Kelly, Graham White, Paul Pennington & Stewart Oates make similar objections. As do, R Crowe, G Platts, J Lodge, S Hanson, MA & JM Youdan, and Mr Turnbull. Peel Land & Property Management Ltd also state this is not justified in line with NPPF and will constrain and reduce housing delivery.

Council’s response: PPG supports the principle of being able to set the requirement as a range. NPPF is clear that Planning decisions should be taken following a plan-led approach. The Council could have just adopted the standard methodology figure as the Local Plan housing requirement in the first instance but have resisted such an approach and instead are planning for a very significant uplift for our ambitions for growth and this is reflected in the scale of allocations proposed. That said, the vast majority of this ambition needs to be delivered by the development industry and the market which may struggle to continue to meet such a high target. The Council has relatively little role to play post Planning decisions being granted in terms of actual housing delivery. Losing control of 5YHLS in this context therefore undermines the key policy objective of having a plan-led approach
rather than the presumption that would be applied if 5YHLS cannot be demonstrated.

Proposed Changes: None

Supporting Representations from:
CPRE (0077)

Objecting Representations from:
Don Parkinson Partnership (05294; 05295; 05296 & 05297)
Hallam Land Management (05212 & 05283)
Theakston Estates Ltd (01937)
Barratt & David Wilson Homes (04955 & 04956)
The Gascoine Group Ltd (04430)
Wilson & McKay Families (05172)
Metacre Ltd (05173 & 05174)
Peter Kelly, Graham White, Paul Pennington & Stewart Oates (05310)
R Crowe, G Platts, J Lodge, S Hanson, MA & JM Youdan (05187)
Mr Turnbull (03259 & 03453)
Peel Land & Property Management Ltd (04288)

**Distribution of Housing Requirement to Settlements & Avoidance of Green Belt**

3.105 The Strategic Land Group, Mr & Mrs S Hall, and Hallam Land Management object to the approach of distributing housing to settlements as overly simplistic and fails to consider the sustainability of settlements or their ability to deliver housing. The former (Strategic Land Group & Mr & Mrs S Hall) also object as the approach does not take account of recent housing growth which disadvantages settlements that have not grown in the past. The Strategic Land Group also maintain that that the council has not taken adequate account of development constraints when arriving at the distribution - particularly with the Green Belt. The council's approach is that the preferred housing distribution justifies that exceptional circumstances exist. In order to achieve distribution, Green Belt must be released. This does not constitute exceptional circumstances. No consideration has been given to alternatives which would reduce or eliminate the impact on the Green Belt. It's possible another distribution could be more sustainable. There is a lack of explanation of the Council's approach to identifying Green Belt locations and a lack of analysis of alternative options in sustainable areas to minimise Green Belt release. Although the Green Belt Topic Paper notes the council is not overly dependent on Green Belt, there is not sufficient evidence that the Green Belt to be allocated is the minimal amount possible and no assessment of unconstrained sites in non-Green Belt areas. The SA has not considered an option of minimising Green Belt development and admits option 4 (preferred) has more impact on the Green Belt than 1 or 2. Makes references to the issue being the subject of the Cheshire East Local Plan Examination.
**Council response:** An update to the housing section was published for Publication stage - Doncaster Housing Background and Strategy, and the employment section was also updated in the ELNA. The Housing Topic Paper 2020 covers the approach to housing in the Local Plan. The approach has been consulted on and was the preferred approach and method for distributing housing as equitably as possible whilst ensuring the most sustainable locations got larger shares - this has long been the established approach. In terms of Strategic Land Group's comments and Green Belt, the approach is explained in the Green Belt Topic Paper, which explores why the constraints the borough faces and it's spatial strategy mean Green Belt release is necessary in some locations. This has only been done where exceptional circumstances exist, consideration has been given to alternative approaches, as the Topic Paper explores. Location of a site is not a sole exceptional circumstance, but forms part of the consideration with other factors. Doncaster Local Plan and its approach should be judged on it's own particular local circumstances, a comparison to other area similarities does not consider the particular circumstances of each Local Plan.

Proposed Changes: None

Objecting Representations from:
The Strategic Land Group (04444)
Mr & Mrs S Hall (04960)
Hallam Land Management (05283)

**Insufficient Housing Growth to Mexborough**

3.106 Countryside Properties object to a lower housing target for the settlement compared to the Core Strategy and what was identified in the 2018 local plan consultation. The scale of allocation will not meet the needs of the settlement and is inconsistent with NPPF therefore.

**Council’s response:** The Local Plan will replace the Core Strategy in due course. That development plan was prepared under a previous Government's national planning policy that pre-dated NPPF and was based on a (higher) non-objectively assessed housing need requirement and contained a less dispersed spatial strategy compared to the emerging Local Plan and hence the difference in the settlement's housing target. Such matters have been consulted on and considered afresh through Reg 18 stages (e.g. Issues & Options/ Homes & Settlements) and the associated Sustainability Appraisal. It was not the Council's aim to allocate a relatively low level of housing to the settlement of Mexborough, and this is reflected in the subsequent Policy 3 range of 475-985 new homes and is comparable to the other Main Towns' targets. The fact more housing has not been subsequently allocated to the Town is a result of the findings of the Site Selection Methodology process which is compounded by the constraints to growth at Mexborough - not least the proposed route of HS2 to the east of the settlement which is safeguarded under Direction of the Secretary of State. In line with previous Local Plan consultations, where a
settlement’s housing target (or within the range in the case of the Main Towns) has not been met (identified) through allocations, the requirement is redistributed and made good by allocations elsewhere at the Main Urban Area and/or Main Towns.

Proposed Changes: None

Objecting Representations from:
Countryside Properties (05256)

**Insufficient Housing Growth to Rossington**

3.107 Rossington Hall Investments Ltd argue that Rossington should receive a larger share of the economic-led housing growth due to the location and investment in the area.

**Council’s response:** The Policy and settlement’s housing requirement does assign economic-growth-led housing (up to 559 dwellings) to the town in addition to local housing need (285 dwellings). There has been various competing calls for different settlements to have a ‘bigger slice of the cake’ none of which amount to a more justified or coherent strategy. Also see response to Policy 2 above.

Proposed Changes: None

Objecting Representations from:
Rossington Hall Investments Ltd (04297)

**Insufficient Housing Growth to Moorends**

3.108 Thorne & Moorends Town Council object on the basis that there is an inadequate growth allocation to Moorends stating that the settlement will become more isolated as a result and be excluded from future investment. Don Parkinson Partnership also conclude that there is a justification for a higher level of housing to the settlement (and Main Town’s tier) over the Service Towns/Villages to allow for a buffer and ensure delivery throughout the plan period. A further 24 Representations were submitted using a very similar/standard response. The Local Plan is unsound. It is not based on, or reflective of the extensive public consultation carried out locally which promoted site 469 for residential development. The Local Plan has failed in its duty to co-operate with Thorne and Moorends Town Council throughout the preparation of both the Local Plan and the Thorne-Moorends Neighbourhood Plan. The Local Plan fails to reflect the Borough Strategy (Doncaster Growing Together) and the Inclusive Growth Strategy. Not allocating any development in Moorends is contrary to the NPPF which positively promotes sustainable development in sustainable communities. Moorends is very sustainable and was recognised as such in the Core Strategy with an allocation of up to 400. In the Local Plan it is a Main Town with a population above 5,000. Moorends is one of the most deprived communities in Doncaster and in need of regeneration. Housing regeneration is essential to stimulate improvement of the current stock and the local economy. The
Local Plan ignores the Objectively Assessed Need and affordable housing need for Moorends and chooses to cluster it with Thorne and fails to meet the needs of both. 11% of the boroughs employment land (52ha) is within walking and cycling distance of Thorne-Moorends and 200m from site 469, however the allocation for Thorne and Moorends is only 5.5%. The Environment Agency have no objections to a floor level of 3.5m nor do any other statutory consultees object. Site 469 is sustainable and within 400m of two schools, a health centre, a children's centre, community centre, retail centre and transport links. The NPPF supports sustainable development, and site 469 is. Site Ref 009 should also be allocated.

**Council’s response:** The Core Strategy will be replaced by the Local Plan in due course. Moorends was identified as a Renewal Town alongside 3 others which had a collective housing allocation of up to 1,660 units during the plan period; it did not specify that each settlement should receive 400 dwellings as that was the role of the subsequent Sites & Policies Plan. That plan did propose a large housing allocation to Moorends (to reflect the early Neighbourhood Plan’s aspirations) but the Plan had to be withdrawn during Examination with one of the main reasons being the Inspector’s findings that there had not been a proper sequential approach to avoidance of flood risk when the NPPF (2012 version) set a very high-bar that flood risk settlements/sites should only be allocated where it was not possible to do so otherwise. The approach to the Local Plan settlement hierarchy therefore requires consideration of sequential testing so that avoidance of flood risk, where possible, has been taken into account at both spatial strategy, then in respect to individual sites. The economic growth-led component of the housing requirement is considered as being more footloose and, in accordance with previous Reg 18 consultation, has followed a sequential avoidance of flood risk approach where possible. An allocation to Thorne-Moorends higher that that identified in the Local Plan would require land in flood zone 3. Thorne-Moorends were grouped together at the outset of the Local Plan process to reflect the emerging Neighbourhood Plan and its designation. It is noted that the allocation to the settlement is considerably higher, and in the middle of the range, in the Publication version of the plan (736 dwellings compared to a range target of 510-1,020) and is significantly higher than the 2018 consultation which identified a figure at the bottom of the range. It is understood that, at the time of drafting, the Neighbourhood Plan is considering making additional housing site allocations. Sites have been assessed through the site selection methodology process and neither sites Ref: 469 (Bloomhill Road, Moorends) or Ref: 009 (Lands End, Thorne) were identified as allocations due to failing the flood risk sequential test (Flood zone 3). See response to Policy 6 in respect to the buffer.

**Proposed Changes:** None

**Objecting Representations from:**

Thorne & Moorends Town Council (01484)
Don Parkinson Partnership (05294; 05295; 05296 & 05297)
Mr Mark Blackham (03037)
Mr Joseph Blackham (03067)
Ms Lorna Norman (03210)
Mr Melvyn Norman (03216)
Mr Mick Farrand (03217)
Hollie Blackham (03774)
Lorna Blackham (03775)
Mr James Carver (04301)
Katy Blackham (04307)
Paige Barton (04320)
Karl Barton (04321)
Luke William Edward Carver (04836)
Jacqueline Gomes (04865)
Ms Lynn Guilfoyle (05257)
Mr Joseph Gomes (05261)
Mr Oliver Gomes (05262)
Ms Portia Gomes (05263)
Melinda Knaggs (05265)
Mr Mike Carver (05266)
Mr Mark Shaw (05268)
Mr Lee Todd (05270)
Mrs Joanne Carver (05274)
Mrs Margaret Carver (05275)
Mr Roy Carver (05276)

**Too Much Housing Growth to Moorends**

3.109 This Representation consists of a standard letter response that was submitted by 256 people stating that they do not support housing allocations in the west of Moorends on Bloomhill Road (Refs: 009 & 469). The letters include direct quotes from the draft Thorne-Moorends Neighbourhood Plan and states that they do not agree with the Local Plan or Neighbourhood Plan. The area is high flood risk and the raising of the site to achieve the necessary mitigation will put existing property at more risk, as well as the wider village, and result in over-looking. The site would be an extension to the village rather than infill. The land is locked by the railway and existing properties. The infrastructure at Moorends is not sufficient to cope with the development (utilities, schools, GPs, and the roads would need widening). The site is greenfield and would result in the loss of wildlife (deer, frogs and newts).

**Council response:** Comments are noted. The Local Plan is not supporting allocation of either of these 2 sites (see response above also). The sites are to remain in ‘Countryside’ so not clear why the Representations do not support the emerging Local Plan as the policy approach remains unchanged.

Proposed Changes: None
Insufficient Housing Growth to Service Towns/Villages

3.110 KCS Developments Ltd conclude that there should be more housing allocated to this tier of the hierarchy, especially to Carcroft-Skellow (due to the need to increase the overall housing target in the first instance as set out above, and then secondly to receive additional housing due to the need to identify a buffer on top of allocations – see Policy 6). South Yorkshire Housing Association, Higgins Agriculture Ltd and Bellway Homes, and, Mr Ian Murray also maintain the need for more of the housing allocation to this tier of the hierarchy (specifically Auckley-Hayfield Green, Finningley, and Askern respectively). The Strategic Land Group and Mr & Mrs S Hall also make similar conclusions in respect to Auckley-Hayfield Green and Sprotbrough respectively, and that they should also benefit from the housing economic-growth uplift as opposed to just receiving baseline housing need.

Council’s response: This relies on the overall housing figure being increased which the Council maintains is not justified – see response above. As per the methodology and settlement split set out in the Housing Topic Paper, the Service Towns/Villages requirements are calculated correctly and proposed allocations identified in line with the Site Selection Methodology. Also see response to Policy 2 above.

Proposed Changes: None

Too Much Growth to Carcroft-Skellow

3.111 Mr Stephen Tomlinson objects on the basis of, applying the logic of 3 people per property, the 250 homes proposed equates to 750 people, or an 8.3% increase in the population of Carcroft-Skellow -significantly greater than the State of the Borough report (2.7%). 2.7% by 2041 is 243 persons. Making an adjustment to 2033 (7 / 22 or a reduction of 7 years) shows population increase would only be 166 people, and again if applying the 3 people per house rule then only 55 dwellings are needed, of which 7 already have permission.

Council response: As Carcroft-Skellow will only deliver to meet it's local need, it's share of the baseline/local needs (that which would happen without policy intervention/an economic uplift) is all that is allocated here (250 dwellings over the plan period).
Proposed Changes: None

Objecting Representations from:
Mr Stephen Tomlinson (04557)

**Insufficient Housing Growth to Defined Villages**

3.112 Barratt & David Wilson Homes object to the lack of allocations being made to the Defined Villages. The Frickley & Warmsworth Estate object that the Policy only lists 14 of the Defined Villages and no reference is made to the remaining 26 Villages, which includes Clayton. They conclude that there is no justification or explanation provided as to why only 14 of the Defined Villages have been identified in the distribution table or what criteria has been used to choose the Villages where some level of growth may be supported. The proposed approach is therefore unjustified and not an appropriate approach as Clayton is excluded from the opportunity for small scale settlement extensions provided by Policy 2 despite being in a sustainable location.

**Council’s response:** See response to Policy 2 above. Policy 2 supports the extension of villages in the Countryside in certain circumstances. However, for settlements in the Green Belt national policy will be applied and this is explained in the Policy and explanatory text.

Proposed Changes: None

Objecting Representations from:
Barratt & David Wilson Homes (04955 & 04956)
Frickley & Warmsworth Estate (05312)
**Policy 4: Employment Allocations**

3.113 There were 109 Representations to this policy with some responses raising multiple comments. The policy also attracted a number of petitions/standard letter type responses which are summarised below as well.

**Over Allocation of Employment Land, Phasing of Employment Allocations & Site Specific Policy for Iport, Rossington (Site Ref: 747)**

3.114 Troy Verdion conclude that the local plan is over-allocating the amount of employment land and that the scale of designated employment land is not justified and the Local Plan cannot be effective in delivering those sites in a sustainable manner. The Council has increased its employment land requirement to 481 ha form 407 ha due to the plan period being extended. The assumption that 72 ha will be needed for those three years is not based on a clear evidence of need. There is minimal evidence that Doncaster’s aspirations for a diverse economy has guided the employment allocations. The Council should remove some of the employment sites and allocate sites within or close to the existing town centres for employment use. This will promote a mix of uses and assist in businesses finding locations for B1 and B2 uses. Policy 5 should include phasing where sites will be released gradually so to meet demand and avoid an excess supply. They also contend that I-Port should have its own site-specific policy. Doncaster Sheffield Airport is recognised as a regional priority and has a separate Chapter/policy in the Local Plan. iPort is also recognised as having economic importance to the local and regional economy. In order to sustain the regeneration gains already made in the borough, iPort should be prioritised in the Local Plan in a similar way to the Airport. The policy should emphasise that B8 uses should be directed towards iPort.

**Council response:** The 'Housing and Employment Site Selection Methodology and Results Report' states why the sites have been allocated to meet the forecast need to support jobs growth and economic ambitions. The forecast land requirement is based on work undertaken by Peter Brett Associates (PBA) (Economic Forecasts and Housing Needs Assessment) that looked at potential jobs growth across the Borough (detailed to 38 employment type sectors) up to 2032. A land requirement calculation (409 ha) was made based on the PBA forecasts. When extending the plan period by 3 years to 2035 it is not unreasonable to use the calculated annual rate for the years 2015 to 2032 (409/17 = 24ha) and multiply by 3 (24 x 3 = 72ha) to give the requirement for those 3 additional years. There is no requirement for a phased approach as this would hinder the market and would not be supported by national planning policy which states that planning policies should help create the conditions in which businesses can invest, expand and adapt. It is not considered that iPort requires a separate Local Plan policy as it already benefits from planning permission.

Proposed Changes: None
Objection Representations From:
Troy Verdion (05177)
Proposed Employment Allocation Site Ref: 001 – J6, M18 Thorne North – Support

3.115 Mr D Parkinson & Barmston (Thorne) Limited support the allocation of and conclude that it provides 73.63 ha of land for employment uses. The site has a delivery partner and is mainly owned by a single landowner. The site is subject to an outline planning application. The documentation demonstrates that the site is available for immediate development; is suitable for the development of employment uses; and comprises a viable development site for which there is commercial interest and market demand. The site is wholly deliverable to meet Doncaster's objectively assessed employment needs in the plan period. Site Ref:001 clearly accords with the wider spatial strategy set by strategic policies 2 and 3 in proposing major employment development suitable for logistics, manufacturing and light industry uses outside Doncaster's main urban areas, albeit adjoining the Main Town of Thorne-Moorends and its resident population. It is in an area which is attractive to the market, can accommodate large buildings and has good access to the strategic transport/motorway network. The site has been selected following comprehensive assessment including the Employment Land Need Assessment, Sustainability Appraisal and Site Section methodology. None of these identify a more suitable site in the north of the borough. The Council is justified in allocating this site which is deliverable and comprises an effective allocation and policy approach in accordance with NPPF para 35. The representation is supported by a detailed Delivery Statement. Ms Doreen Parkinson and Mrs Susan Sweeting state they own and control part of the site and fully support this allocation and the associated development. They confirm that they are actively engaged with Barmston Thorne Ltd regarding the delivery of the site. They are not aware of any technical or land ownership issues that would prevent the delivery of the site and welcome the involvement of Barmston Thorne Ltd and they have a strong track record of delivery.

Council response: Support welcomed

Proposed Changes: None

Supporting Representations from:
Mr D Parkinson & Barmston (Thorne) Limited (05293)
Ms Doreen Parkinson (05271)
Mrs Susan Sweeting (05272)
Proposed Employment Allocation Site Ref: 001 – J6, M18 Thorne North – Objections

3.116 The CPRE object on the basis that site Ref:001 is the largest and most peripheral of the employment allocations and represents outmoded and an unsustainable approach of road dependent employment growth. West Moor Holdings also object to the allocation and conclude that their site (Ref: 013) should be supported instead. They contend that their site is: sequentially preferable in flood risk terms; better located in terms of attractiveness to the market; and, is does not have the deliverability issues that site Ref:001 has which is evidenced by the pending planning application and large number of objections and outstanding issues, including objections from statutory consultees. They do not believe the proposed allocation has been justified/clear reasons why it is now the preferred allocation.

Harworth Group also object to the proposed allocation of Site Ref:001 over their own site (Ref:160 – Bradholme, Thorne). In summary, they contest that the Council’s explanation of the reasoning behind the allocation in the Site Selection and Methodology and Results Report gives no substantial planning and environmental evidence to support the rationale. It is a fundamental shift from the Council’s previous position at the informal consultation stage where the site was not selected for allocation but Bradholme was (Site Ref:160). They make similar objections to West Moor Holdings above in respect to deliverability and the long-standing pending planning application with numerous unresolved technical constraints. They also argue that sites have not been consistently or accurately assessed through the process, including SA. Blue Anchor Leisure make objections very similar to the above including flood risk sequential test and inaccurate/inconsistent assessment of site options through the SA process and the outstanding technical issues identified via the pending planning application. They also conclude that Site Ref: 001 will not deliver in the plan period the yields anticipated so there is a need to allocate additional land such as their site (Ref:1031 – West Moor Park East, Armthorpe), or if not allocated identified as a Reserve Site for flexibility/ buffer.

3.117 Following the close of Publication, an online petition (Change.org) was submitted to the Council signed by 109 signatories objecting to the proposed employment allocation at Thorne North. In addition to the online petition, a copy of a second ‘paper petition’ that had been circulated for signing locally was submitted with 281 signatures. As well as the ‘paper petition’ there were a total of 289 standard letters received objecting to the allocation. In summary, the concerns raised in the standard letter were: the site is flood zone 3 and climate change will increase risk in the future; DMBC’s Air Pollution Officer does not support development on the site (based on comments to the planning application) and it will result in increased traffic and poorer air quality; loss of grade 3 agricultural land; loss of Countryside; the site is not a sustainable extension as located on the wrong side of the M18; there are no safe pedestrian or cycle routes to the site; there are sufficient levels of warehousing in the Town already and no need for anymore; and, the site is not identified for employment by the local community in the
Neighbourhood Plan. A number of individuals also sent Representations objecting to the allocation. Mrs Barbara Hartley, Justin & Liesel Bullas, Julie Marshall, Rita Howard, and Andrew Howard object in line with the standard letter. Julia Thomson raises the same concerns as per the above, but in addition objects to: the loss of biodiversity (water voles) and habitat (nightjar foraging); A614 is a dangerous road; job creation will be minimal due to automation; that the allocation will be used to justify further housing to the west of Thorne-Moorends which is high flood risk; and, that there is too much weight being given to the Neighbourhood Plan which is not representative of the local community. Gillian Mason makes very similar objections to all of the above, and in addition objects that the previous proposed employment site at the Town (Ref: 160 – Bradholme) is now being rejected over site Ref:001 especially given the reason for the change was due to the 2018 public consultation responses. Also, raises that the site is not in single ownership, is not deliverable as has been the subject to an ongoing planning application for 4 years which is still pending, and, the consultation process has been insufficient and primarily undertaken online with very few people knowing about the proposals.

3.118 Thorne-Moorends Town Council asks that due regard for the views and opinions of local residents objecting to the site is given and that the site should be carefully developed to minimise any negative impacts on the surrounding area. National Grid notes that the site is crossed by a high voltage electricity transmission overhead line and that the statutory safety clearances between overhead lines, the ground, and built structures must not be infringed.

**Council’s response:** The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites. The responses to the Issues and Options Consultation highlighted that jobs/sites do not need to be located next to the people they serve. Also, the market analysis of the sites/jobs requirements shows that there is a strong continued demand for large sites for logistics with the M18 corridor being the preferred location. The Employment Land Review (Colliers 2019) and Employment Land Need Assessment demonstrate this. In the site assessment and selection process all of the remaining site options without planning permission in the M18 corridor (and part M180) are in Flood Zone 3. Consultation has been undertaken at various stages in the Local Plan process in line with the Statement of Community Involvement and responses play an important role in the decisions made. The sites proposed for allocation have been identified as the most appropriate to meet the job requirement. See response to Policy 3 in respect to the buffer/flexibility.

Proposed Changes: None
Objecting Representations from:
CPRE (0077)
West Moor Holdings (01191)
Harworth Group (05190)
Blue Anchor Leisure (05197)
Petition 1 – 109 signatures online via Change.org (05315)
Petition 2 – 281 signatures via ‘paper petition’ (05316)
289 x Standard Letters (05317)
Mrs Barbara Hartley (0951)
Justin & Liesel Bullas (05151)
Julie Marshall (05264)
Andrew Howard (05260)
Rita Howard (04965)
Julia Thomson (03659)
Gillian Mason (03661)

Other Representations from:
Thorne-Moorends Town Council (01484)
National Grid (04854)

**Supported Employment Allocation – Site Ref:941 – RHADS Site 1, Phase 4 Business Park**

3.119 The CPRE object and state that the site would only be justifiable on the basis of a robust sustainability strategy with regard to new railway access and a carbon reduction strategy. Blue Anchor Leisure Ltd also object and consider that the site has not been accurately assessed through the SA process in respect to bus service accessibility.

**Council response:** Comments noted, the local plan (Policy 13) supports a new rail station at the Airport. It should also be noted that since Publication of the local plan, this site has now has a planning application approved where such matters (accessibility and sustainability) will have been considered and addressed. Sites have been appraised via the SA process consistently and against primarily objective criteria.

Proposed Changes: None

Objection Representations From:
CPRE (0077)
Blue Anchor Leisure Ltd (05197)

**Supported Employment Allocation – Site Ref:092 – Balby Carr**

3.120 Blue Anchor Leisure Ltd object and consider that the site has not been accurately assessed through the SA process in respect to bus service accessibility.
Council response: Sites have been appraised via the SA process consistently and against primarily objective criteria.

Proposed Changes: None

Objection Representations From:
Blue Anchor Leisure Ltd (05197)

Supported Employment Allocation - Site Ref:441 – Carcroft Common

3.121 The CPRE object to the proposed allocation, unless it is to serve local employment needs and helping to address deprivation. West Moor Holdings object stating the site is comparable to West Moor Park North (Ref: 013) in terms of flood risk and scoring through the Sustainability Process. However it is very unattractive to the market and significantly less attractive than West Moor Park North. The local plan itself recognises that Carcroft Common has significant infrastructure constraints. It is located in the A19 but there is no obvious route across the A1(M). Carcroft Common is dependant upon the A1/A19 Link Road and the local plan recognises this constraint by envisaging 12 ha (25% of the site) coming forward during the plan period. A site of this size is not attractive for large scale uses. The Council clearly has an obligation to try and promote sites in the north. However the Carcroft Common site is far removed from the motorway and would be more attractive to local companies. Carcroft Common is undeliverable and its allocation is unsound. Blue Anchor Leisure Ltd also object expressing similar concerns and conclude that the site has not been assessed accurately or consistently through the site selection process, including SA and that the site fails the flood risk sequential test. They cite the long-term allocation of the site in the UDP as grounds for clear evidence that the site is not attractive/deliverable etc. The National Grid note that the site is crossed by a high voltage electricity transmission overhead line and that the statutory safety clearances between overhead lines, the ground, and built structures must not be infringed.

Council response: The Housing and Employment Site Selection Methodology and Results Report states why this site has been allocated.

Proposed Changes: None

Objecting Representations from:
CPRE (0077)
West Moor Holdings (01191)
Blue Anchor Leisure Ltd (05197)

Other Representations from:
National Grid (04854)
Supported Employment Allocation – Site Ref:1032 – Bankwood Lane, Rossington

3.122 Tanks & Vessels Industries Ltd support the identification of their site as an allocation through this policy. However, they state that the policy needs amending to allow flexibility to enable consideration of other uses on these sites in order to accord with national policy.

**Council response:** These sites are allocated for employment use in order to meet the job need for the borough and are protected for that purpose.

Proposed Changes: None

Objecting Representations from:
Tanks & Vessels Industries Ltd (05198)

Rejected Employment Allocation - Site Ref:160 – Bradholme, Thorne

3.123 Thorne-Moorends Town Council support the local plan in its decision to no longer allocate the site. Harworth Group welcome the acknowledgement of the need for an employment site near to Thorne and the M18/M180 corridor but have significant concerns in relation to the location and characteristics of the proposed site Ref:001. Although site Ref:001 is within the general M18/M180 motorway corridor, it is generally disconnected from Thorne-Moorends in terms of lack of connectivity by all sustainable travel modes. It does not have the locational advantages that their site enjoys given its unique characteristics in that it best serves the Humber Ports while also possessing all the other market catchment advantages of the M18 sites and therefore object to the local plan not allocating their site. Further details provided as per the response above objecting to the proposed allocation (Ref:001).

**Council response:** Support from the Town Council is welcomed. See response above to Site Ref: 001 also. The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions.

Proposed Changes: None

Supporting Representations from:
Thorne-Moorends Town Council (01484)

Objecting Representations from:
Harworth Group (05190)
Rejected Employment Allocation - Site Ref:013 – West Moor Park North, Armthorpe

3.124 West Moor Holdings object to the local plan not allocating their site. The site was previously allocated in earlier versions of the development plan but not in the Publication Draft. The Housing & Employment Site Selection Methodology & Results Report acknowledges that the site could build on the success of the existing West Moor Park to the south but the reason for rejecting the site is: "The allocation of the site would exceed the supply of employment land for this plan period. Sites other than this one have been chosen for allocation in order to provide a balanced distribution of employment land across the Borough." West Moor Park North has excellent direct access to J4 of the M18 and lies immediately to the west of the M18. It benefits from an existing spur from the roundabout on the A630 West Moor Link Road. Access onto the site from the motorway is much quicker and direct than access into the Thorne North site allocation (Ref:001). West Moor Park North also occupies a high-profile location to the north of the existing, very successful West Moor Park employment site. The location is attractive to occupiers and West Moor Park North would build upon this success. It is also much better related to a larger population than Thorne North and should be afforded greater weight on this basis. Thorne North is separated from Thorne by the motorway and an employment allocation would be better placed to the east of the M18 so it is better related to Thorne. West Moor Park North is deliverable and more attractive to the market than any of the alternative sites. It should be allocated in preference to Thorne North and/or Carcroft Common.

Council response: The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions.

Proposed Changes: None

Objecting Representations from:
West Moor Holdings (01191)

Rejected Employment Allocation – Site Ref:937/1031 - West Moor Park East, Holme Wood Lane, Armthorpe

3.125 Blue Anchor Leisure Ltd object to the local plan not allocating their site and have concerns about the amount and choice of employment land proposed for allocation providing evidence on why there needs to be more land allocated. They conclude that West Moor Park East is the most logical and sustainable option to remedy the problems with the employment land supply. The Council’s reasons for the non-allocation of West Moor Park East are either inaccurate or they are not sound reasons for rejection of the site, including inaccuracies with the SA. This potential development area has now increased to 88.5ha and a revised masterplan has been prepared. The entire site is in two ownerships who are collaborating to
promote the land. Vacant possession can be delivered at short notice. Land necessary to deliver access is within the public highway and within ownership of existing land owners. The development of the site is consistent with the plan's spatial strategy. Policy 3 indicates that B1, B2 and B8 classes in main towns will be met in locations with good access to the M18/M180 network. Junction 4 is an established location for large scale employment. The Core Strategy identifies this junction as an area for growth. West Moor Park East is part-previous developed, with an extant planning permission for major motorsport and leisure uses. West Moor Park East comprises land of a low landscape quality, as explained in the attached Vision Document. 55% (48.6 hectares) of West Moor Park East is in Flood Zone 1, the lowest zone of flood risk and discussions have taken place with the Environment Agency to agree in principle that the remainder of the site can be developed for employment, subject to mitigation. Written agreement has been reached with First Bus to extend the existing 15 Service into the site to provide high frequency bus services. West Moor Park East has good links with both the built-up area of Armthorpe and the main urban area of Doncaster. These links will be improved by the proposed improvements to the A630 (West Moor Link), which are funded and under construction. There is a large available labour pool nearby. There are six well known commercial developers that have expressed serious interest in the development of the site.

**Council response:** The Employment land Supply Figure as explained in the ELNA is ambitious and realistic. The ‘Site Selection Methodology’ sets out the reasoning for sites being selected for allocation or rejected. The sites proposed for allocation are the ones (in the Councils Local Plan process) selected to be the most sustainable to meet the forecast need for new sites to support jobs growth and economic ambitions. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites.

Proposed Changes: None

Objecting Representations from:

Blue Anchor Leisure Ltd (05197)

**Rejected Employment Allocation – Site Ref:461 – Redhouse Lane (a) North West, Adwick**

3.126 Hallam Land Management object that insufficient sites are being identified through this policy to meet the requirement given there is no buffer. To address this, their site should be allocated as well. The site is 18.2ha and can deliver 73,000m² (+58,000m² on a further site) of gross external area floor space. The Council have not allocated the site on the basis of no Green Belt exceptional circumstances and sufficient land, however no buffer has been identified and further sites are required. The Green Belt Review assesses the site in isolation, however if the residential site...
to the south (Site Ref: 513) is also allocated for housing and some employment (which this rep also promotes), it would represent a logical sustainable urban extension, and if treated as a whole would leave a clear defensible Green Belt boundary (railway line and A1). The areas which are in flood zone would be exempt from development and form a green buffer. The site is strategically located next to J38 of the A1 and with existing employment development to the south of the site and east of the A1. Accept there are capacity issues on the A1 but there is also a longer term objective to regenerate the north of the borough, including linking the A1/A19. Para 4.58 identifies public and private investment will be needed in the long term to improve accessibility to new employment areas and to mitigate flood risk. Promoted sites can assist with the delivery of this.

**Council response:** See response to Policy 3 in respect to the buffer. The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The site in question is in the Green Belt and the Green Belt Topic Paper explains why there are no employment allocations within the Green Belt at this time i.e. it is considered that there are currently no exceptional circumstances.

Proposed Changes: None

Objecting Representations from:
Hallam Land Management (05283)

**Rejected Employment Allocation — Site Ref: 1016 — Land to East of Attero, Rossington**

3.127 Eco Power Environmental Ltd object to the local plan for not allocating their site as a 'rail head and loading facility' and states that the plan should be amended to include this site as a 'multi modal rail terminal'. The site is currently in the Green Belt but the Representation disputes the Green Belt review findings. The site is in an ideal location where there is demand for such a facility which will provide sustainable modes of transport in line with NPPF and create jobs.

**Council response:** The reasons for sites being allocated or not are detailed in the 'Site Selection Methodology Report' in the evidence base.

Proposed Changes: None

Objecting Representations from:
Eco Power Environmental Ltd (05277)

**Rejected Employment Allocation — Site Ref: 1035 — Hill Top, Denaby**

3.128 Harworth Group PLC object to their site not being allocated for part employment use (with the remainder being allocated for housing). They contend
that there are no employment allocations to this part of the borough and that their site should be removed from the Green Belt and allocated to remedy this.

**Council response:** See response to Policy above in respect to distribution of employment land. The Housing and Employment Site Selection and Result Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The Green Belt Topic Paper explains why there are no employment allocations within the Green Belt at this time i.e. it is considered that there are currently no exceptional circumstances. The explanatory text of Local Plan Policy 3 also explains that there is access to business parks across the border in Rotherham. These can be accessed using strong public transport links and road connectivity.

Proposed Changes: None

Objecting Representations from:
Harworth Group PLC (05203)

**Rejected Employment Allocation – Site Ref:149 – Nutwell South, Nutwell Lane, Armthorpe**

3.129 Mr Philip Lodge objects to the local plan not identifying land in his ownership when there is clearly an identified need for SMEs within the borough/Armthorpe and site Ref:149 is ideally located for this. It also has the ability to unlock vital infrastructure i.e. a much needed Armthorpe bypass. The proposed SME provision for this site is a different offer as the local plan and the Neighbourhood Plan do not currently make an allowance for SMEs. The local plan is not positive or effective. An increase in SMEs should be encouraged to accommodate and boost the number of new and growing industries. Government funding has been made available specifically for 'Enhancing the Competitiveness of Small and Medium Sized Enterprises in the Sheffield City Region'. The Council should consider Site Ref:149 as highly sustainable, deliverable and developable and support it as a mixed use development. The Plan should be based on evidence and an appropriate strategy as there is no reasonable evidence to discount the site. The Site Assessment Methodology is flawed and lacking detail for this site. The evidence base cannot be found sound and the evidence to support growth to the north of the village is also flawed.

**Council response:** The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites. It should also be noted that the employment allocation of 481 ha is for the borough and caters for a range in size and type of units and businesses including SMEs.
Proposed Changes: None

Objecting Representations from:
Mr Philip Lodge (05008)

‘New’ Employment (Mixed Use) Allocation for Consideration at Askern – Land Adjacent to Askern Saw Mills

3.130 Mr Ian Murray submits a ‘new’ site Representation not previously considered via the local plan process and requests the site is allocated for ‘mixed use’ including employment and residential. It concludes that the site should be removed from the Green Belt.

Council response: This is a Green Belt site. The Green Belt Topic Paper explains why there are no employment allocations within the Green Belt at this time i.e. it is considered that there are currently no exceptional circumstances. Likewise, there are no changes being proposed to the Green Belt boundary at Askern to accommodate any housing sites given the very high supply of sites compared to the settlement’s target.

Proposed Changes: None

Objecting Representations from:
Mr Ian Murray (05309)

‘New’ Employment Allocations for Consideration at Edlington – Lords Head Lane & Broomhouse Lane

3.131 Polypipe Building Products maintain that there are insufficient employment sites in the west of the borough and the need to support and grow existing businesses. They submit 2 sites at Edlington in their ownership which have not previously been put to the Council for consideration through the local plan process.

Council response: See response to Policy above in respect to distribution of employment sites. These site are primarily Green Belt (with one designated as Employment Policy Area and Public Open Space in part). The Green Belt Topic Paper explains why there are no employment allocations within the Green Belt at this time i.e. it is considered that there are currently no exceptional circumstances. The explanatory text of Local Plan Policy 3 also explains that there is access to business parks across the border in Rotherham. These can be accessed using strong public transport links and road connectivity.

Proposed Changes: None

Objecting Representations from:
Polypipe Building Products (05285 & 05311)
Flexibility in Uses on Allocated Employment Sites

3.132 IGas Energy PLC supports the policy approach but notes Hydrocarbons can be won using directional drilling and the industry is redirecting to industrial areas. The policy needs to be flexible to allow for other use classes, especially if they are temporary.

Council response: The local plan should be read as a whole and other uses will be permitted where relevant considerations have been addressed

Proposed Changes: None

Objecting Representations from:
IGas Energy PLC (05129)

Part C - Local Labour Agreements

3.133 Mr D Parkinson & Barnston (Thorne) Ltd supports this approach and states that this is something that their allocation will be able to comply with. However, Tanks & Vessels Industries Ltd object stating that this policy could prevent a full and proper competitive tendering for new developments, limit the use of certain contractors and have adverse economic investment consequences. They conclude Part C should be deleted from the policy wording.

Council response: Support welcomed. The aim of local labour agreements is to ensure that local people benefit from development in the borough. The Council works closely with employers and local training providers to ensure that this happens.

Proposed Changes: None

Supporting Representations from:
Mr D Parkinson & Barnston (Thorne) Ltd (05293)

Objecting Representations from:
Tanks & Vessels Industries Ltd (05198)
**Policy 5: Employment Policy Areas**

3.134 There were 5 Representations to the policy. Tanks & Vessels Industries Ltd cite the policy as being sound and support inclusion of their land as being identified by such a designation and the flexibility the policy allows for development. Polypipe Building Products conclude the policy allows for loss of employment land to other uses and therefore the need to allocate additional employment sites. IGas Energy PLC request the policy is broadened to recognises that the hydrocarbons industry is redirecting to industrial areas so needs flexibility to allow other use classes, especially where temporary. One individual believes there is not enough consideration given to location of employment uses adjacent to residential areas, and amenity issues that has been created over recent years where this has occurred e.g. at Thorne/Capitol Park as well as wider issues in relation to traffic and congestion.

**Council’s response:** In terms of Polypipe Building Products comments, the forecast land requirement is based on work undertaken by Peter Brett Associates that looked at potential jobs growth across the Borough. From the forecast job numbers a land requirement was calculated. This calculation included additional land for Choice, Churn and other uses to build in flexibility (see - Employment land Needs Assessment 2019 update for a more in depth explanation of the land calculation). In respect to IGas Energy PLC’s comments, the local plan should be read as a whole and other uses will be permitted where relevant considerations have been addressed. In terms of residential amenity, the local plan should be read as a whole and numerous policies ensure such matters can be addressed via the planning application and Development Management process.

Proposed Changes: None

Supporting Representations from:
Tanks & Vessels Industries Ltd (05198)

Objecting Representations from:
Polypipe Building Products (05285 & 05311)
IGas Energy PLC (05129)
Chris Hill (04999)

**Policy 6: Housing Allocations**

3.135 Unlike Policy 5 above, which set out the proposed employment allocations, housing allocations are set out in Chapter 16 of the local plan in settlement hierarchy order. As such, site specific Representations in respect to actual supported/rejected allocations are contained in the summary of Chapter 16, although there is some obvious and natural crossover between these two sections of this report. See also Representations to Chapter 4 in respect to allocations for the last 2 years of the plan period.
Overall Housing Allocation – Additional Buffer/Non-delivery/Permission Lapse Rate/Undeliverable Allocations/Viability Challenges

3.136 Taylor Wimpey Yorkshire argue that there is a need to allocate additional sites to allow for viability issues with some of the sites identified and there will also be a shortage of affordable housing therefore provided. Mr R.J. Ogley, Minerals Investments Ltd, Higgins Agriculture Ltd and Bellway Homes, South Yorkshire Housing Association, and, Mr Ian Murray also argue that the allocated supply relies too heavily on permissions for housing and re-allocation of existing sites from the UDP where there are deliverability issues. KCS Developments Ltd also cite the LPEG Report and recommend its findings of a 20% buffer on top of the allocated supply should be identified for choice and flexibility, including non-delivery. Strata Homes Yorkshire Ltd, Mr Paul Burtwistle, Framecourt Homes, Avant Homes Ltd, Priority Space Ltd and Firsure are concerned about the assumptions made from commitments as well as allocations and no discounting of this supply for non-delivery has occurred, some specific sites are challenged. Miller Homes also challenge a number of sites at the Main Urban Area. Don Parkinson Partnership has similar concerns and sees the need to allocate additional sites to allow for delivery throughout the plan period. The Home Builder’s Federation, KCS Developments Ltd, and Persimmon Homes Yorkshire also spell out the need for a buffer and be able to demonstrate deliverability.

Council’s response: Allocations have been made that far exceed the actual housing requirement and there are additional sources of supply identified in addition to this so a buffer is built into the allocations already. A buffer on top therefore would be buffering a supply that has already been buffered. Further detail is provided at Policy 6 and the Site Selection Methodology and Housing Topic Paper. The viability testing considers a number of different viability scenarios. This includes the ‘base’ appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific ‘low-cost’ developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in. All permissions have been assessed in terms of their deliverability and some discounting of supply has occurred and/or sites pushed back into the plan period. Likewise, the handful of remaining UDP allocations being re-allocated are being actively promoted through the local plan process and have been demonstrated as being available and achievable/developable.

Proposed Changes: None

Objecting Representations from:
The Home Builder’s Federation (0129)
KCS Developments Ltd (05319)
Persimmon Homes Yorkshire (03431; 05289 & 05290)
KCS Developments Ltd (05319)
Taylor Wimpey Yorkshire (05280)
Mr R.J. Ogley (03008)
Minerals Investments Ltd (03116)
Higgins Agriculture Ltd and Bellway Homes (03467)
South Yorkshire Housing Association (05214)
Mr Ian Murray (05309)
Strata Homes Yorkshire Ltd (02073)
Mr Paul Burtwistle (03506 & 03507)
Framecourt Homes (05176)
Avant Homes Ltd (05208; 05209 & 05210)
Priority Space Ltd (05213)
Fisure (05215)
Miller Homes (05288)
Don Parkinson Partnership (05294; 05295; 05296 & 05297)

**Housing Land Supply is Confusing (including the use of ranges) and there is an Over Reliance on Planning Permissions**

3.137 In addition to the points set out above (see additional buffer etc issues & response) Mr Turnbull, and R Crowe, G Platts, J Lodge, S Hanson, and MA & JM Youdan conclude the housing land supply position is confusing and inconsistent within the document itself and that some of this is due to the large number of sites with permission being allocated which confuses the plan and such sites do not need to be allocated. The Plan should be clear about the contribution from permissions and new allocations. Hallam Land Management also state that the plan period runs from 2015 to 2035 but for land supply runs from 2018, and for housing only runs to 2033 which is unnecessary complication and should be revised to run to the same dates.

**Council’s response:** The table at Figure 5 sets out the position clearly. Table 5 does not correlate with para. 16.21 as the former is a borough wide total and the latter is only related to the Main Urban Area. See response above to use of ranges. If every settlement delivered at the top of the range there would be an oversupply of housing. They are designed to allow some areas to deliver more or less based on local circumstances and site availability, whilst ensuring that overall the borough meets its housing targets. This has been achieved. The plan delivers enough housing to meet it's 20 year requirement, and can show how it will deliver enough housing for the 15 year period 2018 - 33 and the remaining 2 years, as well as demonstrate supply via completions for the years 2015 - 18. Chapter 16 and the Housing Topic Paper show the sites which are permissions, and those which are non-permissioned...
allocations. They are also differentiated on the supporting Policies Map. 2018 to 2033 refers to the 15 year allocated supply and the figure breakdown is set out in Table 5.

Proposed Changes: None

Objecting Representations from:
Mr Turnbull (03259 & 03453)
R Crowe, G Platts, J Lodge, S Hanson, and MA & JM Youdan (05187)
Hallam Land Management (05212 & 05283)

**Reserve Development Sites**

3.138 Strata Homes Yorkshire Ltd, Mr Paul Burtwistle, Framecourt Homes, Avant Homes Ltd, Priority Space Ltd, and, Firsure raise objections to the sites being identified as Reserve Sites as they are subject to technical constraints and are not suitable and should not be identified as such. Theakston Estates Ltd and Hallam Land Management agree. On one hand, para. 4.82 advises that there is doubt they can be developed or allocations justified, whereas the paragraph goes on to support the principle of development on these sites, subject to sequential and exception tests. As these sites are not deliverable/developable they should have no place in the plan. KCS Developments Ltd also object to Reserve Sites.

**Council’s response:** Reserve development sites are sites which do not count towards any housing calculations or assumptions in respect to housing land supply, but are sites where housing could be located if the technical constraints can be overcome and would be an additional source of supply (windfall).

Proposed Changes: None

Objecting Representations from:
Strata Homes Yorkshire Ltd (02073)
Mr Paul Burtwistle (03506 & 03507)
Framecourt Homes (05176)
Avant Homes Ltd (05208, 05209 & 05210)
Priority Space Ltd (05213)
Firsure (05215)
Theakston Estates Ltd (01937)
Hallam Land Management (05212 & 05283)
KCS Developments Ltd (05319)

**Housing Trajectory**

3.139 Strata Homes Yorkshire Ltd, Mr Paul Burtwistle, Framecourt Homes, Avant Homes Ltd, Priority Space Ltd, and, Firsure raise concerns that, based on the Council’s own trajectory, there will be a shortage of housing being delivered towards the end of the plan period. Theakston Estates Ltd, Swan Homes Ltd, and Hallam Land Management also make similar comments in that the housing trajectory shows
that 920 dpa will not be reached in the final 9 years of the plan period, and 550 dpa (standard methodology requirement) will not be achieved for 7 years of the plan period, and the trajectory drops to approximately 100 dwellings in the final year.

**Council’s response:** The trajectory only identifies supply from allocations and there are numerous other sources of housing supply (see Housing Topic Paper). The only obligation is for the housing requirement to have been met by the end of the plan period, if this is delivered early/upfront then this is a positive approach as the housing need is being met sooner, including affordable housing need (or part of). One policy approach to address such concerns would be to include a phasing policy to release some of the allocations towards phase 2 and 3 of the plan period; this has been resisted as the council do not see phasing as being a positive approach. See Housing Topic Paper for another trajectory showing cumulative completions against the requirement and when in the plan period the requirement is met (just using allocations).

**Proposed Changes:** None

**Objecting Representations from:**
- Strata Homes Yorkshire Ltd (02073)
- Mr Paul Burtwistle (03506 & 03507)
- Framecourt Homes (05176)
- Avant Homes Ltd (05208, 05209 & 05210)
- Priority Space Ltd (05213)
- Fisure (05215)
- Theakston Estates Ltd (01937)
- Hallam Land Management (05212 & 05283)
- Swan Homes Ltd (05291)

**Site Specific Developer Requirements & Appendix 2**

3.140 Historic England support the requirement that the sites allocated will be developed in accordance with the Development Requirements as this will provide certainty to both developers and to the local communities precisely what will and will not be permitted on each site. By alerting potential developers of the considerations for each site, they will assist in delivering sustainable development. Mr Turnbull and R Crowe, G Platts, J Lodge, S Hanson, and MA & JM Youdan object to the requirements as being too prescriptive and may inhibit the development of the most appropriate layout of the site when such details have been established. Does not explain why an education contribution will be required and which schools towards. Mr R.J. Ogley makes the same comment, but states that the requirements are reasonable. Higgins Agriculture Ltd and Bellway Homes and Harron Homes both have concerns that these are overly prescriptive.

**Council response:** Support welcomed. The requirements are not considered as being overly prescriptive; they set out from an early stage what the expectations will
be through a subsequent application and therefore inform design and layout/constraints so that applications can be successful and determined expediently and, as identified by Historic England, bring forward sustainable development.

Proposed Changes: None

Supporting Representations From:
Historic England (0016)
Mr R.J. Ogley (03008)

Objecting Representations From:
Mr Turnbull (03259 & 03453)
R Crowe, G Platts, J Lodge, S Hanson, MA & JM Youdan (05187)
Higgins Agriculture Ltd and Bellway Homes (03467)
Harron Homes (05308)

Chapter 5: Doncaster Sheffield Airport

3.141 There were 7 Representations to the chapter/policy.

Policy 7: Doncaster Sheffield Airport & Business Park

3.142 Historic England request additional policy text and wording in relation to buildings with aviation heritage within the Airport to provide a Heritage Impact Assessment as well as reference to the need for proposals in and around the Airport to have regard to Listed Building and Conservation Area at Finningley. Auckley Parish Council state that there is a need to protect the environment as well as provide improvements to schools and highways in connection to growth of the Airport. They also expect that the requirements of the policy to ensure that jobs are provided to justify any of the housing is adhered to. The CPRE conclude that the proposals for airport growth are unsustainable, unjustified and unsound. Local Planning Authorities have a duty under Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) to ensure that plans 'contribute to the mitigation of, and adaptation to, climate change'. There is no evidence of this with Policy 7. The Yorkshire Wildlife Trust also object. Airport proposals are contrary to NPPF guidance and Policies 30 and 31 of the draft Local Plan. Policy K needs to consider Local Wildlife Sites and the difficulty in achieving green infrastructure across the site. The masterplan is highly insufficient. Furthermore, as per para. 5.26, there is no evidence that the first stage of the mitigation hierarchy being followed with the recent planning application now a permission) on Site Ref: 941 (avoidance). Peel Land & Property Management Ltd strongly support the allocation of land at the Airport for a mixed use development including airport expansion, new homes, new employment, open space and ecological networks. Propose alterations to the policy to ensure it aligns with the ambitions and objectives of the masterplan and the soundness tests. Proposed amendments include: Amendments to some terminology for consistency; Amendments to the mechanism for housing release relative to the creation of jobs
within or attributable to the master plan (delivered/contracted to be delivered). This ensures it is workable in practice; Policy amendments to the central plaza element to reflect emerging proposals and the in principle acceptance of a small element of residential on upper floors to support vibrancy; That 920 additional units is a minimum figure to allow for more housing should more jobs be delivered, the policy should be amended to reflect this. There is no reason that the figure should be capped. It shouldn’t harm housing delivery everywhere as the Airport is self fulfilling in that housing supports economic growth at the airport. The site can deliver up to 3000 homes; Delete the requirement to provide a Strategic Delivery Plan as it is unclear what purpose it has; Amendments related to master-planning, design code and green infrastructure requirements. Factual changes to the policy explanation.

Higgins Agriculture Ltd & Bellway Homes and South Yorkshire Housing Association object stating the draft Local Plan divorces the Airport from its role in the wider spatial strategy. This is significant because it overlooks the existing demand for jobs (and by association the requirement for homes and labour supply) associated with role of the Airport. Raises issues of consistency with national policy, given the ability of the Airport to support a prosperous rural economy. Spatial strategy fails to recognise that a number of settlements in close proximity to DSA, including Finningley and Auckley-Hayfield, have significant potential to support sustainable patterns consistent with paragraphs 78 and 83 of the NPPF. Not justified that the proposed spatial strategy, and the approach to the scale and distribution of housing outlined in proposed Policy 3, does not support any contribution to the economic-led component of housing growth at Service Towns and Larger Villages and only applies to 'Main Towns' identified as potentially suitable to deliver up to 10% of the economic-led growth requirement. It should also be noted that the Airport Masterplan 2018-2037 'Interim Consultation Summary Report' (August 2018) (p.41) demonstrates high volumes of residential property transactions in surrounding settlements which support the airports objectives.

**Council response:** It is not proposed to incorporate Historic England’s request as such proposals in the operational area of the Airport would likely fall under permitted development rights. It is also noted that a planning application has recently been granted for the new facility/visitor attraction housing the Vulcan Bomber. Policies in the Local Plan address matters such as Listed Buildings (Policy 37) and Conservation Areas (Policy 38) and the whole plan should be read together. In response to Auckley Parish Council, the Policy will be implemented via the Development Management process and monitoring of jobs as set out by the Policy and supporting Appendix 3. In respect to comments made by CPRE, Climate change is a theme that runs through the whole plan and the plan is intended to be read as a whole. Policies in other chapters fully promote sustainable forms of travel such as walking and cycling. A Climate Change Topic Paper has been prepared for Submission stage. The DSA masterplan is not replicated verbatim in the Local Plan, and Policy 7 seeks to support elements of it, but also provides checks on some elements such as housing growth, which is linked to job delivery. All proposals around the airport are effectively linked to its success, which the Council supports. The ECML will not come
forward unless there is a robust business case for doing so, however should it come forward, this would represent a genuine step change for the airport and the Borough. The Council acknowledges that the airport masterplan does not cover a range of matters and has been prepared by the airport operator. This is why Policy 7 requires the formulation of a ‘blueprint’, which will show how the airport proposals can be delivered holistically and cover a range of areas that need to be covered. This will be produced between the Council, airport operator, stakeholders and local community. Site 940 will remain as an allocation, and is deemed a suitable site for the reasons set out in Policy 7, and within the parameters set out in this policy. Reject deletion of the policy. In response to Yorkshire Wildlife Trust, the masterplan is an airport document, which will be supplemented by a detailed blueprint developed by the Council, airport operator and local community. As set out in the subtext to Policy 7, the blueprint must cover, amongst other things, the environment. The subtext clarifies that the blueprint must include a green infrastructure strategy, as well as cover biodiversity protection, and how biodiversity net gain will be achieved. The plan should be read as a whole, and Policy 7 sits alongside 30 and 31, and are not contrary to these. In response to Peel Land & Property Management Ltd, then support is welcomed. The Council is broadly supportive of the ambitions of the masterplan, and through Policy 7 a holistic approach can be taken which delivers a carefully considered mixed use site. As such, 280 houses have been allowed in lieu of future delivery of jobs to help the airport to begin to realise its ambitions. In terms of the suggested changes:

- the word "masterplan", as in the document to be drawn up between the Council and the Airport operator, will be replaced by the term "blueprint", which functions in exactly the same way but avoids confusion;
- there will be no amendments to the mechanism. This was agreed at full Council and is the best way of ensuring that jobs will be delivered and when so they lead to houses. Jobs delivered is the clearest way this can be evidenced. The 280 houses up front is designed to help the airport begin to realise it's ambition and is appropriate amount to allow for a mixed use community to begin to develop;
- NPPF para. 85f and Local Plan para. 8.2.1. (Policy 24) covers residential linked to retail - the Local Plan should be read as a whole and there is no need to repeat this here;
- 'Capping' the amount of homes that can come forward has been done to ensure there is some control retained on proposals here. The scale of jobs is ambitious and 1,200 homes would be the result of 10,910 jobs delivered. 1,200 homes is the scale of housing the Council are comfortable with in this location at present. Should job delivery take off in this location, the future reviews or iterations of the local plan can consider this and how to respond to it;
- A strategic delivery plan allows transport implications to be assessed, planned for and mitigated as a result of development;
Changes are proposed to make to labelling of sites for clarity, and some other amendments as set out in the tables of amendments.

In response to Higgins Agriculture Ltd & Bellway Homes and South Yorkshire Housing Association, the Peter Bretts report sets out that 1073 dpa relates to the requirement under the previous NPPF, and that the requirement is 912 (920 dpa) - although the report also notes a figure between 585 and 912 could be appropriate. The Council has chosen to plan for 920 dpa. In meeting this, the airport is additional and treated as a separate matter, and so housing growth here would be additional. The Local Plan will deliver in excess of this. DSA has been factored in to the Peter Bretts work. It has always been acknowledged that the case for DSA is separate to the wider spatial strategy. The settlements of Auckley - Hayfield Green and Finningley also have housing requirements as set out in the spatial strategy and a housing target attributed to them. It should be noted that if the airport delivers the growth envisaged, then Auckley - Hayfield Green will deliver a level of housing on a par with Main Town targets. It is therefore felt that the area is delivering a sufficient amount of housing for its size, and there is no need to allocate additional land in settlements adjacent to the airport. Unclear where 73,000 jobs has been derived from. 1,000 jobs as a baseline is an assumption pending clarification on the actual amounts of jobs which exist at the airport. The policy focusses on the importance of jobs being delivered at the airport and airport related jobs in the Borough. It is considered proportionate to only factor in jobs around the airport when setting a baseline as these are the most readily definable elements to consider. Policy 7 is not reliant on ‘1,000’, it is used as a general example of what the level of jobs may be for illustrative purposes. The HELAA build out rates are not limits, but assumptions about what might be deliverable per annum. The site does not form part of the trajectory and therefore no assumptions have been made about when it might come forward or what the build out rate might be. The policy also is related to permitting housing, not housing being completed and built, subject to jobs delivery. There is no need to identify additional land around the airport, given the allocation of 940, and furthermore the fact that Auckley - Hayfield Green has allocations that far surpass it’s housing target. Finningley is only 5 units short of it’s target of 55 units. Given this is the smallest settlement to receive an allocated supply, further allocations on the scale proposed would not be in line with the settlement strategy or hierarchy. The outcome of consultation was that economic led growth should be delivered in the Main Urban Area and Main Towns, and smaller areas should receive housing to meet local needs only. Site 446 is greenfield, and the minerals application has a remediation condition attached to it requiring its restoration. There is no need to add site 446 in to the allocations. The airport growth and housing is sufficiently covered in Policy 7 and Auckley Hayfield Green has more than sufficient housing land allocated in addition to this.

Proposed Changes:

Supporting Representations from:
Chapter 6: Meeting the Need for New Homes

Policy 8: Delivering the Necessary Range of Housing

3.143 There were 40 Representations received to this policy. The vast majority of the responses were common in their objections to the proposed affordable housing requirement (15% in low value areas and 23% in medium-high value areas) and cite the Council’s own evidence on viability as demonstrating that the requirement, especially in the low value areas, will not be viable. Therefore, in line with NPPF, the policy is not justified and will result in a large number of site specific appraisals at application stage which goes against the government’s intention to reduce the need for such through front-loading viability. Some say that testing sites at plan-making stage will be unreliable. Some request cross references with Policy 67: Development Viability. Representations also state that the policy is overly prescriptive in terms of housing mix and type and requires a more flexible approach. There are calls for greater recognition of Build-to-Rent and other routes to affordable home ownership in the tenure section. The National Custom and Self-Build Association object and conclude the Council is not meeting its duties in terms of identifying the need for such plots, and then identifying sites to accommodate the need. Some Parish Councils believe more needs to be done to bring back into use empty properties over new homes being built and are concerned that the plan is not sufficiently planning for the needs of our older population and take issue with how S106 monies are currently being used. The industry are concerned that providing bungalows and accessible/adaptable housing for an ageing population will impact on viability (see also Representations to Policy 46: Housing Design Standards).

Council response: It is not considered that the policy is overly prescriptive in respect to housing mix and the policy text refers to the need for such to be informed by latest evidence which in itself acknowledges that this may change during the lifetime of the plan. The viability testing considers a number of different viability scenarios. This includes the `base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas
return a viable outcome. Also, there is a specific `low-cost? developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in. It is not the intention to repeat national policy in the local plan. NPPF sets out the detailed definitions of affordable housing. It is also noted that these definitions were significantly changed as part of the revisions to NPPF meaning inclusion in the local plan could date if such definitions are changed again by government. The latest definitions have been considered through the 2019 Housing Needs Study. Following the publication of the relevant legislation in 2016, Doncaster Council has been inviting interest for custom and self-build housing (both individuals and groups) and maintaining a register of any such interest. As at November 2019 there are 21 entries on the Register, all individuals. The Council also maintains and publishes the Brownfield land Register that records plots of previously developed land suitable for housing development. This is published on our website and is updated annually. The Carr Lodge, Woodfield site (Ref.13/00073/REM) includes a large area (1.5ha) of serviced land specifically for self-build homes alongside a supporting design code for their development. This plot of land (at average density rates) should support approximately 45 homes. Also, the large mixed use Unity site as mentioned in the representation (15/01300/OUTA) has at least 0.4 hectares of land made available for the development of self-build plots. This equates to approximately 12 homes. The demand raised by the Self Build register will be monitored and an appropriate response to that demand will be provided. See response to Policy 46: Housing Design Standards also in respect to planning to meet the needs of an ageing population.

Proposed Changes: None

Representations from:

The Home Builders Federation (0129)
Gladman Developments Limited (02989)
Persimmon Homes Yorkshire Ltd (03431; 05289 & 05290)
The Joint Rural Parishes (04013)
Quod Limited (05250)
Marr Parish Council (0746)
Strata Homes Yorkshire Ltd (02073)
Mr R.J. Ogley (03008)
Minerals Investments Ltd (03116)
Mr Turnbull (03259 & 03453)
Higgins Agriculture Ltd and Bellway Homes (03467)

Mr Paul Burtwistle (03506 & 03507)
Rentplus UK Ltd (04240)
The Strategic Land Group (04444)
Barratt and David Wilson Homes (04955 & 04956)
Mr And Mrs S Hall (04960)
Framecourt Homes (05176)
R Crowe, G Platts, J Lodge, S Hanson, MA & JM Youdan (05187)
Avant Homes Ltd (05208; 05209; 05210; & 05211)
Priority Space Ltd (05213)
South Yorkshire Housing Association (05214)
Policy 9: Removal of Occupancy Conditions

3.144 There were no Representations received in respect to this policy.

Policy 10: Houses in Multiple Occupation

3.145 There were 2 Representations received in respect to this policy. The Environment Agency are concerned about the policy approach to self-contained ground floor/basement flats in areas at flood risk and that this should be clarified given issues with recent applications and difficulty in providing mitigation and creating safe points of refuge, although we accept that flood risk policies elsewhere in the plan will apply. Thorne & Moorends Town Council object to the policy at Part E and the reference to twenty properties on the basis that the figure is not justified and should be higher.

Council response: Agree that other policies in the Local Plan would be relevant (Policy 58: Flood Risk Management) and the approach of the whole local plan has been to avoid duplication wherever possible (as some of the responses have been critical of the length of the document already) but given this is such an issue for the borough then propose to address as a Main Modification. In response to Thorne-Moorends Town Council, raising the figure to a higher threshold would make the application of the policy easier which would seem to go against the aims of the objection which is to make applications for HMO’s more difficult. However, there are suggested changes to the Policy to Part E to specifically address concerns raised in how the policy would be applied. Suggested additional explanatory text is proposed which will apply the policy to a community-wide basis taking into account the impact on rows of houses, streets and the wider area. For the avoidance of doubt, this could include consideration of multiple streets and rows of properties including corner premises and need not be limited to one road at a time.

Proposed Changes: Yes – see supporting Schedule of Suggested Changes (Doc Ref CSD5) to address the EA’s Representation as well as wider amendments to Part E in respect to thresholds due to concerns around application of the policy.

Representations from:
Environment Agency (0014)
Thorne-Moorends Town Council (01484)
Policy 11: Residential Policy Areas

3.146 There were 8 Representations lodged against this policy, with some making multiple comments, however none were considered as actually making direct comments in respect to the policy itself and were site specific or comments already made to other policies in the plan e.g. Policy 28 and sites of local greenspace.

Policy 12: Gypsies, Travellers & Travelling Show People

3.147 There was only a single Representation to this policy from the Environment Agency who note and accept the response to comments made to the 2018 consultation and the addition of wording at para. 6.24.

Council response: Support welcome

Proposed Changes: None

Representations from:
Environment Agency (0014)

Chapter 7: Transport, Access & Infrastructure

3.148 CPRE raise an overall objection to the chapter. Chapter 7 is unsound as it does not meet the needs of the borough to address climate change, nor does it take account of the evidence about climate change or changing travel demand. Local Planning Authorities have a duty under Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) to ensure that plans ‘contribute to the mitigation of, and adaptation to, climate change’. There is no evidence of this. They also suggest inclusion of an additional ‘new’ policy to help travel needs meet Doncaster’s carbon reduction pathway to net zero by 2050 which will be based on reducing the need to travel and widening travel choices. John Seale also raise an objection that the plan is ‘unsound’ as there are no policies in this section in respect to reducing vehicle emissions.

Council response: Climate change is a theme that runs through the whole plan and the plan is intended to be read as a whole. Policies in the chapter fully promote sustainable forms of travel such as walking and cycling. A Climate Change Topic Paper has been prepared. It is not considered that this ‘new’ policy is necessary therefore. In respect to Mr John Seale, all policies in the plan need to be read as a whole as set out at para 1.14. Other policies deal with such matters, for example Policy 55: Pollution.

Proposed Changes: None

Representations from:
CPRE (0077)
Mr John Seale (05043)
Policy 13: Strategic Transport Network

3.149 There were 16 Representations made to the policy with some responses raising multiple points. Highways England are generally supporting and keen to continue working with the Council to establish high level mitigation requirements and associated approximate costs where necessary through the Infrastructure Delivery Plan (IDP). The policies are generally acceptable or not relevant to Highways England. However, it is noted that the revised policy no longer allows for pooled contributions to be collected from multiple developers towards highway mitigation schemes to cater for cumulative impacts, despite this previously being included. Network Rail is supportive of the concluding it is positively prepared in relation to the strategic rail network. Both United Kingdom Onshore Oil & Gas and IGas Energy PLC support the principle of minimising traffic movements where feasible. And the need for transport assessments. Bassetlaw District Council support the policy, specifically the improvements required to improve access from North Nottinghamshire to Doncaster in light of recent growth and the joint feasibility study between Doncaster and Bassetlaw Councils and Nottinghamshire County Council to resolve road traffic congestion at Tickhill Spital junction and elsewhere along the A631 corridor to ensure that it does not exacerbate congestion. This means both Council's will fully understand the highways capacity issues and approach to mitigation by all relevant partners. This will be an essential element of ongoing Duty to Cooperate work between the two Councils. Hallam Land Management supports the improvements to the strategic road network, in particular the A1-A19 link which is important for realising the potential of employment and regeneration opportunities in the north. The CPRE request consequential changes in line with their comments above in respect to carbon reduction etc. The Canal & River Trust suggest that the policy, or supporting text, should be amended to promote the use of alternative transport methods, such as by rail or water, for temporary freight movements associated with construction where this is feasible and practical.

3.150 Peel Land & Property Management Ltd welcome the commitment that proposals will be supported which improve rail transport, including electrified mainline rail connection and airport rail station. They state that the policy needs to be accompanied by explanatory text which sets out that if these come forward in the plan period, there will be a need to review the relevant Local Plan policies as rail connectivity will significantly increase and change the nature of development opportunities here, which the Plan currently does not account for. The draft policy also refers to improved access to the Airport from the M18, it is unclear what specific proposals this refers to given the Great Yorkshire Way has been completed. Clarification is sought. South Yorkshire Housing Association also strongly support the new rail station at the Airport.

3.151 Marr Parish Council support the need for widening of the A1(M) but not if this is to justify this area for growth as part of a future plan. There is no requirement or public demand for a link road between the A19/A1(M) - it should not be included in
the Local Plan. Support the duelling of the A630 West Moor Link Road, the Hatfield Link road and the Hickleton/Marr bypasses. Strongly oppose the current High Speed Phase 2b proposed rail route through Doncaster and South Yorkshire as well as a proposed rail junction at Clayton or a Dearne Valley Parkway Station. Agree that rail links to the Airport would help to take traffic off the roads and aid congestion. The Joint Rural Parishes make similar comments in respect to improvements leading to future growth in the Green Belt/West of the Borough.

3.152 Daniel Meekin concludes that improvements to West Moor link are long overdue and many more improvements to the network are needed around the area before housing is supported. Road improvements are necessary now, before the proposed additional 6500+ homes within the Edenthorpe/ Kirk Sandall/ Barnby Dun/ Hatfield/ Thorne area.

**Council response:** Support is welcomed. The IDP has been updated to include the outcome of the modelling and what the implications are in respect to local plan sites and associated improvements. Pooled contributions was removed due to the CIL Regulations but proposed to reinstate as a Main Modification to policy 66 now that the Regs have been updated to remove the restriction on pooling. In respect to freight movements, the Council agrees the suggested wording provides greater clarity so this has been included as a minor modification to the explanatory text at para 7.8. The Joint Feasibility study referred to is being undertaken and Doncaster Council will continue to work with Bassetlaw DC on these matters as well as seeking funding from DfT for schemes e.g. pinch points. In respect to Peel Land & Property Management Ltd comments, there is now a statutory requirement to review local plans at least every 5 years. In respect to M18 access improvements, this is a general reference to the potential need for improvements rather than a specific ‘new’ scheme, for example it could be in respect to signal improvements. In terms of the comments from Marr Parish Council and the Joint Rural Parishes, some of these are matters for the spatial strategy. The local plan generally supports employment warehousing along the M18 corridor and Airport as opposed to the A1(M). The Carcroft Common site is not Green Belt however and is supported as an allocation (re-allocation). The A1-A19 link road is a priority and required to improve accessibility and regeneration for the north of the borough. There are currently no proposals to duel Westmoor Link (this was previously proposed however). HS2 route is safeguarded in the local plan under Direction of the Secretary of State and the Council has no choice but to show the route on the Local Plan policies map. In terms of Daniel Meekin’s points, the Representation refers to a number of existing planning permissions as well as several infrastructure projects, some current and some planned. These matters have been considered through current and forthcoming applications. Modelling has been undertaken of the local plan development (AECOM) in terms of impact on the local highway network.

Supporting Representations from:
Highways England (03631)
Network Rail (0198)
United Kingdom Onshore Oil & Gas (05014)
IGas Energy PLC (05129)
Bassetlaw District Council (0010)
Hallam Land Management Ltd (05283)

Other Representations from:
CPRE (0077)
Peel Land & Property Management Ltd (04288)
South Yorkshire Housing Association (05214)
Canal & Rivers Trust (03089)
Marr Parish Council (0746)
Joint Rural Parishes (04013)
Daniel Meekin (04517)

Policy 14: Promoting Sustainable Transport in New Developments

3.153 There were 10 Representations to this policy. The Canal & Rivers Trust support the policy. CPRE request consequential amends in line with their comments made above. Miller Homes support the policy. Barratt & David Wilson Homes support in principle making financial contributions but state that the policy is too vague and needs details on how this will be calculated. Avant Homes Ltd and Metroland also concur that Part B of the policy is unclear and should be deleted and also have issues with car parking part of the policy (A4) and contend that monitoring is onerous. Quod Ltd also requests car parking standards are reconsidered on a site-by-site basis. Marr Parish Council consider that traffic surveys should assess the cumulative impacts of development and undertaken independently but he Council and funded by the developer. The Joint Rural Parishes hopes that the Local Planning Authority will be robust in its requirements for new developments arising from Policy 14 as evidence suggests otherwise.

Council response: Support welcomed. In terms of contributions then the AECOM modelling of the local highway network provides further details. Car parking standards are based on the Council’s evidence and considered appropriate. Monitoring is a fundamental aspect of the planning process and is set out from the beginning of the application process so has certainty. The local plan has undertaken modelling of all local plan development sites (both individually and cumulatively) on both the strategic road network and local highways network - see supporting evidence base such as AECOM report.
Proposed Changes: None

Supporting Representations from:
Canal & Rivers Trust (03089)
Miller Homes (05288)

Other Representations from:
CPRE (0077)
Barratt & David Wilson Homes (04955 & 04956)
Avant Homes Ltd (05211)
Metroland (05216)
Quod Ltd (05250)
Marr Parish Council (0746)
Joint Rural Parishes (04013)

**Policy 15: Doncaster Town Centre Car Parking**
3.154 There were no Representations received in respect to this policy.

**Policy 16: Lorry Parking**
3.155 There were no Representations received in respect to this policy.

**Policy 17: Cycling in Doncaster**
3.156 There was a single Representation to this policy from CPRE who request changes to the policy wording to state that: cycle routes will be shorter than routes for cars wherever practicable; and, road space will be reallocated to cycling if segregated routes cannot be provided.

**Council response:** The suggested changes to part B of the policy may be preferable but not considered as being something that can be achievable in all instances so difficult to include in policy. The suggested addition to C3 is more achievable and is proposed to be included as a Main Modification to the plan.

Proposed Changes: Yes – see schedule of Suggested Changes (Doc Ref CDS5) to address Representation from CPRE to Part C3 of the policy.

Representations from:
CPRE (0077)

**Policy 18: Walking in Doncaster**
3.157 There was a single Representation to this policy from CPRE who request changes to the policy wording to provide alternative direct routes to local facilities and the town centre.
**Council response:** The Representation is not clear why this is considered necessary and in the Council’s view is already covered by the policy.

Proposed Changes: None

Representations from:
CPRE (0077)

**Policy 19: Development Affecting Public Rights of Way**

3.158 There are a number of developers/landowners who object to Part D of the policy. Such an approach on non-definitive footpaths is onerous and restrictive and could hinder the delivery of schemes. The effect of such a restrictive approach coupled with requirements for on-site open space, national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. The policy requires greater flexibility therefore.

**Council response:** It is not considered unreasonable that a developer should ‘consider’ un-recorded public footpaths on a site. If this part of the Policy was not in place it would be highly likely that any un-recorded footpaths would be given no consideration and would be lost by default.

Proposed Changes: None

Representations from:
Strata Homes Yorkshire Ltd (02073)
Persimmon Homes Yorkshire Ltd (03431; 05289 & 05290)
Mr Paul Burtwistle (03506 & 03507)
Framecourt Homes (05176)
Avant Homes Ltd (05208; 05209; 05210 & 05211)
Priority Space Ltd (05213)
Fisure (05215)
Metroland (05216)
Harron Homes (05308)
Barratt and David Wilson Homes (04955 & 04956)

**Policy 20: Access, Design & Layout of Public Rights of Way**

3.159 A number of developers/landowners are concerned with parts B and C of the policy which specifies the routes and dimensions of public rights of way. Such an approach is onerous and restrictive and could hinder the delivery of schemes. No evidence is provided to support this policy or the requirements set out within it.

**Council response:** Doncaster council is committed to creating and providing a high quality access infrastructure for all users e.g. the Rights of Way Improvement Plan
It is not considered that the requirements detailed in Policy 20 do anything other than provide a framework to ensure provision of a quality network.

Proposed Changes: None

Representations from:
Strata Homes Yorkshire Ltd (02073)
Persimmon Homes Yorkshire Ltd (03431; 05289 & 05290)
Mr Paul Burtwistle (03506 & 03507)
Framecourt Homes (05176)
Avon Homes Ltd (05208; 05209; 05210 & 05211)
Priority Space Ltd (05213)
Firsure (05215)
Metroland (05216)
Harron Homes (05308)

Policy 21: Public Rights of Way Crossing Roads, Railways, Canals & Rivers

3.160 There was a single Representation to this policy from Network Rail who support the policy as this provides protection for the safety of road and rail users and is positively prepared and effective.

Council response: Support welcomed.

Proposed Changes: None

Representations from:
Network Rail (0198)

Policy 22: Telecommunications & Utilities Infrastructure

3.161 Historic England support the policy as ‘sound’ and should help to ensure that any new telecommunications or utilities infrastructure does not detract from the significance of the Borough’s heritage assets. Gladman Developments Ltd recognise the important role that digital infrastructure plays but remind the Council that provision of access to such infrastructure is not within the direct control of developers. CPRE suggest inclusion of additional wording at Part F of the policy to refer to landscape.

Council response: Support welcomed. Gladman’s comment is noted and it is not considered that additional wording in respect to landscape would improve the policy as drafted.

Proposed Changes: None

Representations from:
Historic England (0016)
Chapter 8: Retail & Town Centres

Policy 23: Locating Town Centre Uses

3.162 There were no Representations to this policy.

Policy 24: Development Within Town, District & Local Centres

3.163 There were no Representations to this policy.

Policy 25: Food & Drink Uses

3.164 There were 2 Representations received to this policy. Kentucky Fried Chicken (Great Britain) Ltd object in that the policy effect assesses the requirement for hot food takeaways within 400m to be zero and does this without reference to how many are already present. No assessment has been made to how many would be refused and the resultant impact. The policy is also negative in its assumptions using 'unhealthy food' as an unhelpful isolation of the people. There is no evidence to link the incidence of obesity and proximity of hot food takeaway so unclear of justification. Takes no account of real barriers canal, roads within radius. No regard for national policy and advice in Policy 25 (c and last paragraph) as no policies refer to dietary issues. McDonalds Restaurants Ltd fully support the policy's aim of promoting healthier living and tackling obesity. However the policy approach is unsound and fails to provide an evidence-based way of achieving the policy's objective. The underlying assumption in the policy is that all A5 uses (and any restaurants with an element of A5 use) are inherently harmful to health. In addition, the policy fails to acknowledge the wider benefits that restaurants can have, including benefits relevant to community health and well being. The policy fails to acknowledge that food choices high in calories and low in nutritional value are made at premises trading with A1 and A3 consents and the policy makes no attempt to control these uses.

Council response: The Local Plan aims to have a healthier thread throughout the whole Local Plan and this is just one policy which can contribute to reducing obesity levels and supporting people in making healthy choices in Doncaster. Planning has worked alongside Public Health colleagues who have been involved in the development of the Local Plan. New opportunities to improve the health and well-being and health inequalities of our residents has resulted in the inclusion of a new aim, chapter and policies with a specific policy and evidence review on Hot Food Takeaways. Specific evidence has been published.
Proposed Changes: None

Objecting Representations from:
Kentucky Fried Chicken (Great Britain) Ltd (05137)
McDonald's Restaurants Ltd (05138)

**Chapter 9: Countryside**

3.165 CPRE object to Chapter 9 as being unsound because the plan is not positively prepared to achieve positive outcomes for the countryside and offers no spatial strategy for Doncaster's countryside. They conclude it is wholly unfit for purpose. What is missing here is any articulation of the range of types, characteristics and needs of the Borough's small villages, farming communities and the landscapes they sit within. Many of these are isolated by lack of amenities, lack of public transport and dependence on private cars for transport, but are nevertheless an intrinsic part of the Borough's character and of its future. To these communities whether they are Green Belt or Countryside is irrelevant. Within the policy designation, there is no vision or policy for how they are to evolve, and be made fit for a low carbon, low car future, or risk exclusion from this by lack of planning. The Plan should be comprehensively restructured, so that the Borough's rural areas are not crudely cut off from settlements and then further sub-divided into ‘Green Belt’ and ‘Countryside’. Instead, a sub-area structure for the Plan, whereby settlements and their surrounding countryside can be understood and planned for in synergy with each other is recommended. There are groups of interconnected settlements that could be grouped and assessed.

**Council response:** All policies in the Local Plan need to be read together (para 1.14 of the Plan's introduction highlights this). The introduction to Chapter 9 is clear that the Plan’s strategic approach to Countryside is set out in Policy 2. Policy 2 adopts a settlement hierarchy to direct development to the more sustainable settlements. Some development is supported in the Borough’s smaller settlements, and subject to policy criteria in Part 5 A-E, in the Countryside if adjacent to a Development Limit of a settlement in levels 1-3 of the hierarchy, and in exceptional circumstances (as defined) in the Countryside adjacent to Defined Villages. This adopts an approach which is consistent with NPPF policy and which is positive towards supporting rural housing which together with Policy 26 adopts a sound measured approach to considering development proposals in the Countryside. Further detail is given in the Settlement Strategy Background Paper.

Proposed Changes: None

Objecting Representations from:
CPRE (0077)
**Policy 26: Development in the Countryside**

3.166 Historic England and the Environment Agency suggest cross references could be made in respect to replacement dwellings/re-use and conversion of dwellings with heritage and flood risk policies. A number of Representations from the development industry object stating that the policy is overly restrictive and not in accordance with the NPPF. The Countryside designation is misleading and implies a strong degree of protection, akin to that of the Green Belt which is not required. NPPF identifies the need to recognise the intrinsic character and beauty of the countryside as part of the pursuit of sustainable development, it does not direct that all countryside should be protected for its own sake. It is not positively prepared as it places restrictions on residential development outside of development limits defined in Policy 2. The policy must have the flexibility to support sustainable development on non-allocated sites outside of development limits. Peel Land & Property Management Ltd request all of their land in the DSA Masterplan be removed from the Countryside designation. BBS Doncaster Ltd object stating that the policy seeks to unduly restrict the size of replacement dwellings and extensions to dwellings in the countryside without explaining why a 40% increase threshold is appropriate. Permitted development rights to dwellings in the countryside have not been distinguished differently to those in settlements. Therefore a dwelling in the countryside benefits from the standard generous PD rights. As a consequence to Policy 26, where planning permission is required for development the Council is seeking to be restrictive than that where planning permission is not normally required under PD. Warde-Aldham Estates make similar comments and request parts of the policy (1A) are deleted as not in compliance with NPPF. United Kingdom Onshore Oil & Gas and IGas Energy PLC state that the policy must recognise the Written Ministerial Statement (2018) and reflect that minerals, including oil and gas, can only be worked where they are found (the working of which is temporary).
Council response: All policies in the Local Plan, where relevant, will need to be applied. The introduction to Chapter 9 is clear that the Plan’s strategic approach to Countryside is set out in Policy 2. Policy 2 adopts a settlement hierarchy to direct development to the more sustainable settlements. Some development is supported in the Borough’s smaller settlements, and subject to policy criteria in Part 5 A-E, in the Countryside if adjacent to a Development Limit of a settlement in levels 1-3 of the hierarchy, and in exceptional circumstances (as defined) in the Countryside adjacent to Defined Villages. This adopts an approach which is consistent with NPPF policy and which is positive towards supporting rural housing which together with Policy 26 adopts a sound measured approach to considering development proposals in the Countryside. Part 5E of Policy 2 allows for planned flexibility in those circumstances where there is a lack of a 5 year housing land supply - this maintains the primacy of the Development Plan but allows development adjacent to settlements in tiers 1-3 of the settlement hierarchy in the circumstances set out. Without such a policy approach there would be significant pressure for proposals for development on the edge of, or near to, settlements throughout the borough - which would be clearly unsustainable. This would be contrary to NPPF policy in para 170b that planning decisions should recognise the 'intrinsic character and beauty of the countryside'. To allow such development would lead to an un-planned gradual erosion of the character of the countryside and setting of settlements. Further detail is given in the Settlement Strategy Background Paper. In response to BBS Doncaster Ltd and Warde-Aldham Estates, policy is included to avoid development by re-use/conversion where it would be excessive effectively amounting to a completely new building. Supporting text in para 9.10 includes a guide to what is likely to considered acceptable in terms of volume increase of an original building. As such the policy is the local interpretation of national policy. As per the above, the local plan should be read as a whole. See minerals policies and paragraph 14.33 which cover temporary nature of mineral workings.

Proposed Changes: None

Representations from:
Environment Agency (0014)
Historic England (0016)
Gladman Developments Ltd (02989)
Persimmon Homes Yorkshire Ltd (03431; 05289 & 05290)
Hallam Land Management (05212)
Swan Homes Ltd (05291)
Don Parkinson Partnership (05294; 05295; 05296 & 05297)
Peel Land & Property Management Ltd (04288)
BBS Doncaster Ltd (04950)
Warde-Aldham Estates (04706; 04707; 04708; & 04709)
United Kingdom Onshore Oil and Gas (05014)
IGas Energy Plc (05129)
Chapter 10: Green Infrastructure

3.167 There were numerous Representations to the policies in this chapter (Policies: 27; 28; 30;31 & 33) from Mr Christopher Owen. However, the Representations do not generally object or comment in respect to the policies themselves, rather that one of the housing allocations proposed (Ref:350/407 – Rosehill, Cantley) is not in accordance with these policies so cannot/should not be allocated.

Council response: The site is identified as a housing site not green space or green infrastructure in the current UDP and the Local Plan proposes to retain this status. Housing sites have developer requirements which will provide GI assets as part of the proposal. Comments refer to a site proposed for development rather than the specifics of the policy. The assessment of the site for suitability as a housing site includes assessment criteria relating to such matters. Council officers will consult on planning applications and ensure any valuable assets are retained.

Proposed Changes: None

Objecting Representations from:
Mr Christopher Owen (05059)

Policy 27: Green Infrastructure

3.168 There were 13 Representations to the policy. The Environment Agency suggested a 10m buffer to riverbanks should be maintained to support habitats and public access, but note Policy 31 A3 refers to provision of appropriate buffers around wildlife features. Historic England support the policy as being ‘sound’ which will help to ensure the continued protection and enhancement of this network. Canal & River Trust strongly welcome the content of part B of this policy, which relates to proposals adjacent or near to waterways. The general principles identified could significantly assist in promoting future use of the waterway corridors for public use, including walking and cycling (which would promote healthy lifestyles) and could also help promote waterside based regeneration activities. CPRE object that the policy does not go far enough in interpreting NPPF para. 180a which requires ‘development to mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development - and avoid noise giving rise to significant adverse impacts on health and the quality of life, and wildlife’. Avant Homes Ltd, Metroland, Persimmon Homes Yorkshire Ltd, & Barratt & David Wilson Homes object stating the policy places overly restrictive requirements on developers which could affect the deliverability of sites across the Borough. The requirement of a green infrastructure masterplan for all residential development proposals comprising more than 30 homes is unnecessarily onerous. Flexibility should be added to the policy to ensure that a green infrastructure masterplan is only required where it is clearly and demonstrably necessary. Mr R.J. Ogley & Mineral Investments Ltd also object making similar comments that the policy is inadequately clear in respect of measures needed to ensure compliance.
Council response: Support welcomed. In respect to CPRE’s comments, it is for the developer (through a GI masterplan) to consider tranquillity. There is no additional government guidance for strengthening protection relating to tranquillity. In terms of the objections from the industry, NPPF para 20(d) identifies strategic policies should make sufficient provision for green infrastructure. Para 91(c) identifies the role of green infrastructure in achieving healthy and inclusive safe places. Para 150 identifies that development in vulnerable areas can be managed through suitable adaptation measures, including through the planning of green infrastructure. Para 181 identifies the importance of GI in Air Quality Management Areas and Clean Air Zones. The provision of a GI masterplan is best placed to provide this information. The specific nature of requirements to be satisfied are clearly identified in the bullet points of the policy. Given each development proposal is different, the starting point for the specific GI requirements can be identified through pre-application talks. GI should be considered at the outset and addressed as an integral part of any new development. The supporting text clarifies what is needed. Applicants should be providing development proposals that deliver good quality, sustainable schemes and green infrastructure is an essential part of this.

Proposed Changes: Yes – suggested changes to policy wording from 30 family dwellings to sites 1ha+ to provide clarify that all major residential and non-residential development proposals should contribute to GI. As drafted the policy would have only applied to residential schemes. See Doc Ref CSD5 for details.

Representations from:
Environment Agency (0014)
Historic England (0016)
Canal & River Trust (03089)

Objecting Representations from:
CPRE (0077)
Avant Homes Ltd (05211)
Metroland (05216)
Persimmon Homes Yorkshire Ltd (03431; 05289 & 05290)
Barratt & David Wilson Homes (04955 & 04956)
Mr R.J. Ogley (03008)
Mineral Investments Ltd (03116)
Policy 28: Protecting Open Space & Non Designated Open Space

3.169 There were 9 Representations to the policy. Historic England note that many of the Borough's Conservation Area Appraisals identify open spaces which are considered to make an important contribution to their character. The loss of these areas therefore would result in harm to their historic character and should be reflected in the policy. Barratt & David Wilson Homes object to part b of the policy being negatively worded approach to the development of non-designated open space. Effectively any parcel of land which is not protected in the Local Plan as open space would therefore be classed as non-designated open space which cannot be the intention. Messers Cooper & Warde-Aldham Estates both object to land in their ownerships being identified as Sites of Local Green Space Value in the local plan. Sites Refs: 1015 & 215 respectively. Messers Cooper also objects in that the plan as drafted is imprecise about the distinction between land allocated for open space purposes and land designated as local green space. There is no way of telling from the plan the purposes of the designation on the policies map, which simply states open space. Barnby Dun with Kirk Sandall Parish Council object to an existing open space at Sutton Road being retained as POS and request designation for residential uses instead. They state that the site has not been used as open space since 2007 when the playground/park was closed by the Parish Council and has been chained shut since due to costs associated with maintaining the site following flooding. There is no prospect of the site re-opening as a playground or open space. There are no local objections to the site being closed.

Council response: Additional criteria proposed as per the suggested wording from Historic England. In response to Barratt & David Wilson Homes, the policy is not negatively worded. In line with paras 96 and 97 of the NPPF the policy protects open spaces and provides clarity on acceptable types of development in open space areas. In response to Messers Cooper & Warde-Aldham Estate the Local Green Space Value report sets out the methodology and conclusions for why sites have been designated as such. In response to the Parish Council, although this request has come forward late in the process, it is not felt that allocating this site for a purpose other than open space is justified in the Local Plan. There is a lack of evidence as to why the loss of the open space is justified or surplus to requirements, the Main Urban Area can provide ample land for housing, and the Kirk Sandall community profile area is deficient in open space suitable for children's play. That said, this could be pursued through the planning process should the Parish Council wish to continue promoting this site for an alternate use, and existing and emerging policy provides the means by which open space loss can be justified, should the relevant justification be provided.

Proposed Changes: Yes – Suggested Changes to address comments raised by Historic England (see Doc Ref CSD5).

Representations from:
Historic England (0016)
Policy 29: Open Space Provision in New Developments

3.170 There were 28 Representations to the policy with all the comments coming from the development industry/landowners. They all make very similar objections along the lines of developer’s should only be expected to provide for those facilities which are made necessary by the development proposed and not simply in order to make up for existing deficiencies in provision, or provide benefits for the community at large. It should also be acknowledged that this may have a knock-on effect on housing density and the need for additional land to be allocated for new development. Some also cite: lack of clarity in terms of what is expected; excessive requirements from commuted sums; and, the potential for viability issues that may ensue from the policy requirements, as well as not being compliant with planning obligation tests.

Council response: The provision of a 10 to 15% commuted sum is reasonably related in scale and in kind to the development and is derived through consideration of spatially specific local open space provision. The green space audit (and subsequent updates) identifies open space provision by community. The figures of 10 and 15% are adapted from the Fields in Trust guidelines for open space requirements (see Fields in Trust 2.4Ha standard). NPPF paragraphs 8b and c identifies the social and environmental objectives of the NPPF. Including the need to provide open spaces that reflect current and future needs and support communities' health, social and cultural well-being. Paragraph 92a says we must plan positively for the provision of open space and other local services to enhance the sustainability of communities and residential environments. Paragraph 96 states access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. The policy is required to make developments acceptable in planning terms as noted above. The green space audit (and subsequent updates) ensure that obligations are directly related to the development and reasonably related in scale and kind, therefore meeting with paragraph 56 of the NPPF. Green space provision also contributes to green infrastructure requirements in line with NPPF paragraph 20 (d) identifies strategic policies should make sufficient provision for green infrastructure. Paragraph 91 (c) identifies the role of green infrastructure in the achieving healthy and inclusive safe places. The whole plan viability testing has also made allowances for contributions towards open space, whether on-site or in lieu.

Proposed Changes: None

Objecting Representations from:
Strata Homes Yorkshire Ltd (02073)
Mr R.J. Ogley (03008)
Minerals Investments Ltd (03116)
The Home Builders Federation (0129)
Gladman Developments Limited (02989)
Persimmon Homes (Yorkshire) Ltd (03431; 05289 & 05290)
Higgins Agriculture Ltd and Bellway Homes (03467)
Mr Paul Burtwistle (03506 & 03507)
The Strategic Land Group (04444)
Warde-Aldam Estates (04706; 04707; 04708 & 04709)
Mr And Mrs S Hall (04960)
Framecourt Homes (05176)
Priority Homes Ltd (05208; 05209; 05210 & 05211)
Firsure (05215)
Metroland (05216)
Harron Homes (05308)
Mr Ian Murray (05309)
KCS Developments Ltd (05319)

Policy 30: Ecological Networks

3.171 There were 10 Representations to the policy. Yorkshire Wildlife Trust are encouraged to see the consideration and work towards Nature Recovery Networks and identification of biodiversity opportunity areas across Doncaster. Natural England recommended that the plan could do with further detail on what actually underpins the policies in terms of evidence that is needed and be clearer as to what is required to achieve a 'measurable' net gain compared to general enhancement opportunities which will not be required to use the metric or provide ecological assessment. CPRE contend that Policy 30 should be part of Policy 31, creating a coherent, holistic policy. Giving sites and networks two separate policies fails to make explicit the absolute link that must be made between them. Mr R.J. Ogley, Minerals Investments Ltd, Higgins Agriculture Ltd & Bellway Homes, and Mr Ian Murray object on the basis that the policy is inadequately clear or effective as currently drafted and could undermine the delivery of the Plan if the required contribution is not adequately considered within the Local Plan viability evidence. Should refer to supplementary guidance (to be prepared) regarding possible mitigation measures and biodiversity offsetting calculations, so that the policy requirement is fully understood with reference to guidance in the NPPF. Peel Land & Property Management td also suggest revisions to the policy wording to comply with NPPF. United Kingdom Onshore Oil & Gas and IGas Energy PLC note that onshore oil and gas sites are temporary in nature and provide a good opportunity, post decommissioning, to be restored to an enhanced environmental condition that maximises habitat creation and an overall net gain in biodiversity. Long-term biodiversity net gain may not be achievable at exploration and appraisal stages.
Council response: To address comments raised by Natural England, additional text has been added to the supporting text of the policy and it is intended to prepare further information supplementary to the Local Plan about the Council's requirements for delivering net gain in due course. In response to CPRE, it is not considered necessary to combine the policies. An additional sentence has been added to bullet point C to reiterate the importance of the ecological network with respect to SSSI's. Some of the proposed changes duplicate the NPPF policy and advice is that Local Plans should not simply repeat the guidance in the NPPF. In terms of comments from the industry, Policy 31 provides more information about requirements for net gain, biodiversity offsetting calculations and the use of the mitigation hierarchy. All policies must be read in conjunction with one another. The impacts of an application on the ecological network would be considered in light of any proposed mitigation as they would be considered against all policies. As per the response to Natural England above, it is intended to prepare further information supplementary to the Local Plan about the Council's requirements for delivering net gain. In response to Peel Land & Property Management Ltd, net gain is a requirement of the NPPF not just in cases 'where possible'. In response to United Kingdom Onshore Oil & Gas & IGas Energy Plc, see minerals policy and paragraph 14.33 which covers temporary nature of mineral workings. Applications will be dealt with on a case-by-case basis, using relevant policies in the Local Plan and national policy/guidance, whilst taking account of which stage the development proposal is at.

Proposed Changes: None

Supporting Representations from:
Yorkshire Wildlife Trust (01546)

Objecting Representations from:
Natural England (03820)
CPRE (0077)
Mr R.J. Ogley (03008)
Minerals Investments Ltd (03116)
Higgins Agriculture Ltd & Bellway Homes (03467)
Mr Ian Murray (05039)
Peel Land and Property Management Ltd (04288)
United Kingdom Onshore Oil & Gas (05014)
IGas Energy Plc (05129)
Policy 31: Valuing Biodiversity & Geodiversity

3.172 There were 9 Representations to the policy. CPRE object stating that areas of high biodiversity and geodiversity value must be protected and enhanced. Enhancement measures will include increasing the total area of valuable habitat in the Borough, and linking up existing areas of high value habitat such as 'ecological stepping stone sites', 'wildlife corridors' and 'Nature Improvements Areas' to create coherent and continuous ecological networks. Ecological networks and connectivity are vitally important in sustaining sites and addressing the impacts of climate change. The overall aim is to work in partnership to deliver conservation gain at a landscape scale. They suggest amendments to the policy accordingly. Natural England make the same comments in respect to net gain as per Policy 30 above. Minerals products Association claims the policy does not properly distinguish between the hierarchy of international, national and locally designated in terms of development and needs redrafting. Yorkshire Wildlife Trust contend that the policy contradicts Policy 7 (Airport) which cannot achieve basic targets under current circumstances. They support the inclusion of 10% net gain for both designated and non-designated sites and the associated explanation in 10.40. and that 'surveys will be requested in line with British Standard'. YWT supports the inclusion of buffers around local sites. Sheffield Area Geology Trust note that their previous suggestion, which stated "In situations where proposals may cause harm to a geological site (which often means destruction of the site), might it be possible to stipulate that such a proposal will only be supported if a scheme to record scientific information from the site prior to its permanent loss is included'. Peel Land & Property Management Ltd object. The current NPPF requires LPAs to 'pursue opportunities' for securing measurable net gains for biodiversity. The Spring Statement announced that the government will be mandating net gains in the Environment Bill, but detailed legislation will be required for 10% net gain. This has not been developed or enacted and the government has set a transition period of two years relating to biodiversity net gain requirements. This uncertainty should be recognised in policy and explanation. To be consistent with the NPPF, a policy amendment is required to provide flexibility in circumstances where a minimum 10% net gain in biodiversity cannot be achieved, or where addressing other ecological considerations means it is preferable not to achieve such gain. Mr D Parkinson & Barmston (Thorne) Limited also make similar comments. United Kingdom Onshore Oil & Gas and IGas Energy Plc supports intentions of policy, but should recognise the temporary nature of minerals and sites can be redeveloped to maximise habitats and biodiversity. Net gain may not be necessary or appropriate at hydrocarbon exploration and appraisal phases.
Council response: See response to Policy 30 above as well. In response to CPRE, as above it is not considered necessary to combine this policy with Policy 30. An additional sentence has been added to bullet point C to reiterate the importance of the ecological network with respect to SSSI’s. Some of the proposed changes duplicate the NPPF policy and advice is that Local Plans should not simply repeat the guidance in the NPPF. In terms of the Yorkshire Wildlife Trust, see response to policy 7. The Local Plan is required to balance economic, environmental and social aspects of the NPPF. In terms of Mineral Products Association comment, the Council disagrees and contends that the policy as drafted distinguishes between the different levels of protected site and applies appropriate Development Management criteria for each level. In response to Sheffield Area Geology Trust, Policy 31 A6 covers the recording of a geological site at risk by permanent loss. In terms of Peel Land & Property Management Ltd comments, the policy was drafted at a time when the direction of the government with respect to net gain and the use of biodiversity metrics was clear. As it stands currently the NPPF requires development to deliver a net gain in biodiversity. The policy provides clarity for developers by specifying the use of the latest Defra Metric and for developments to deliver 10% net gain in biodiversity in order to satisfy the requirement in the NPPF for net gain. It is intended to prepare further information supplementary to the Local Plan about the Council's requirements for delivering net gain. The local plan should be read as a whole. See Local Plan paragraph 14.33, which covers temporary nature of mineral workings.

Proposed Changes: Yes – Policy amended as a Suggested Change to address the Representation from CPRE and to reiterate the importance of the ecological network with respect to SSSI’s. Also, additional supporting text in respect to biodiversity net gain is suggested to address the comments from Natural England. See Schedule of Suggested Changes (Doc Ref: CSD5) for more details.

Representations from:
Yorkshire Wildlife Trust (01546)
Objecting Representations from:
CPRE (0077)
Natural England (03820)
Mineral Products Association (04371)
Sheffield Area Geology Trust (01747)
Peel Land & Property Management Ltd (04288)
Mr D Parkinson & Barmston (Thorne) Limited (05293)
United Kingdom Onshore Oil & Gas (05014)
IGas Energy Plc (05129)

Policy 32: Local Wildlife & Geological Sites

3.173 There was a single Representation from Sheffield Area Geology Trust supporting this policy.
**Council response:** Support welcomed.

**Proposed Changes:** None

**Supporting Representations from:**
Sheffield Area Geology Trust (01747)

**Policy 33: Woodlands, Trees & Hedgerows**

3.174 There was a single Representation to this policy from Mr Christopher Owen; however, the Representation does not actually object or comment in respect to the policy itself, rather that one of the housing allocations proposed (Ref:350/407 – Rosehill, Cantley) is not in accordance with this policy so cannot/should not be allocated.

**Council response:** The site is identified as a housing site not green space or green infrastructure in the current UDP and the Local proposes to retain this status. Housing sites have developer requirements which will provide GI assets as part of the proposal. Comments refer to a site proposed for development rather than the specifics of the policy. The assessment of the site for suitability as a housing site includes assessment criteria relating to trees and woodlands. Council officers will consult on planning applications and ensure any valuable assets are retained.

**Proposed Changes:** None

**Objecting Representations from:**
Mr Christopher Owen (05059)

**Policy 34: Landscape**

3.175 There were 6 Representations to the policy. Historic England support the policy that will help to ensure that development proposals conserve and enhance the Borough’s landscapes. The Canal & Rivers Trust welcome the reference to the special qualities of rivers, waterways and their surroundings that should help ensure that development positively addresses the waterway network in Doncaster. East Riding of Yorkshire Council welcome the reference to Thorne-Hatfield Moors. The CPRE object and state that the policy should be substantially revised to give landscape the importance it requires as the setting for all development and to reflect the European Landscape Convention. The explanatory text focuses only on policy not the importance of landscape to people and place. Landscape is more than scenery - it is the interaction between people and place. United Kingdom Onshore Oil & Gas and IGas Energy Plc state that the policy needs to recognise minerals can only be worked where they are found and mineral sites can be screened and restored in line with planning conditions which take note of landscape character.
Council response: Support welcomed. In response to CPRE’s comments, it is accepted that the policy should be amended to include cumulative impact. In response to United Kingdom Onshore Oil & Gas and IGas Energy Plc, the local plan should be read as a whole. With regard to planning applications appropriate conditions (such as those related to screening and landscape character) will be applied using the policies in the plan. Para 14.33 also covers temporary nature of mineral workings.

Proposed Changes: Yes – additional text suggested to be added to the policy to consider cumulative impact and to address CPRE Representation. See Doc Ref CSD5 for further details.

Supporting Representations from:
Historic England (0016)
Canal & Rivers Trust (03089)
East Riding of Yorkshire Council (0009)

Objecting Representations from:
CPRE (0077)
United Kingdom Onshore Oil and Gas (05014)
IGas Energy Plc (05129)

Chapter 11: The Historic Environment

3.176 Historic England conclude that the policies in the chapter are "Sound". They support the suite of non-strategic policies which amplify the strategic policy for the historic environment (Policy 35). These Policies cover areas about which either the NPPF is largely silent or are needed to address local circumstances of the Plan area. Taken as a whole, these Policies provide clear guidance about how decision makers should react to development proposals affecting the historic environment (NPPF Para. 16(d)). In conjunction with Policy 35, these Policies help to satisfy the requirement in Para. 185 of the NPPF that the Local Plan should set out a "positive strategy for the conservation and enjoyment of the historic environment".

Council response: Support welcomed.

Proposed Changes: None

Supporting Representations from:
Historic England (0016)

Policy 35: Valuing our Historic Environment

3.177 There were no Representations to this policy (notwithstanding Historic England’s Representation which is set out above)

Policy 36: Understanding & Recording the Historic Environment
3.178 In addition to the Historic England Representation, there was as single Representation from the Mineral Products Association to the policy. They request revisions to part A of the policy so that heritage statements should be proportionate to the assets importance and only needs to understand the potential impact of the proposal on their significance.

**Council response:** There is appropriate wording contained within the explanatory text and local plan policy is not required to repeat NPPF wording.

Proposed Changes: None

Representations from:
Mineral Products Association (04371)

**Policy 37: Listed Buildings**

3.179 There were no Representations to this policy (notwithstanding Historic England’s Representation which is set out above)

**Policy 38: Conservation Areas**

3.180 In addition to the Historic England Representation, Warde-Aldham Estates were the only Representation to the policy. Whilst it is important to set out a positive strategy for the conservation and enhancement of the historic environment across the whole of the Borough, it should be acknowledged that the historic environment should not preclude future development in appropriate villages. For example, conservation areas should not preclude development but, ensure that special care is taken when considering any future proposal/design, that the new development is built to a high standard and, where possible, seek to preserve and/or enhance the significance of the associated heritage asset.

**Council response:** The policy does not state that new development is precluded but that proposals should take heritage significance into account and amplifies the NPPF by outlining the criteria by which such proposals would be assessed. Whether this precludes any development on a particular site or part of a conservation area would depend very much on the extent of harm to its heritage significance, how this is mitigated, and whether the extent of public benefits outweighs this harm (which is in line with the NPPF). The policy states that proposals that can be shown to enhance the character and appearance of a conservation area would be supported (with particular reference to local distinctiveness cross-referenced to policies 35 and 42).

Proposed Changes: None

Representations from:
Warde-Aldham Estates (04706; 04707; 04708 & 04709)
Policy 39: Historic Parks & Gardens

3.181 In addition to Historic England’s Representation, there were 4 other Representations to the policy. 360 Degree Media conclude that the policy should be removed given the protection of heritage assets in the NPPF. Avant Homes Ltd object that the designation of Local Historic Interest do not match historical connections. The evidence base and policy need to be thoroughly reviewed. At Cusworth Hall the boundary of the Local Historic Interest expands beyond the Registered Park and Garden to land which is not associated with Cusworth Hall. The area therefore has no Local Historic Interest other than a limited visual connection which can be managed through other policies in the plan. The area of Local Historic Interest should therefore be reviewed.

Council response: The NPPF expects that local authorities set out a positive strategy for the conservation and enjoyment of the historic environment. As part of a positive strategy we have identified undesignated heritage assets such as parks and gardens of local historic interest (with a commitment to identify buildings and structures of local interest as well). The evidence base for this was then subject to public consultation. In response to 360 Degree Media, we are also proposing policies for their conservation. Policy 39 covers parks and gardens of both local and of national significance but (in line with the NPPF) differentiates how they are to be treated according to their heritage significance. It amplifies policy where the NPPF is silent and is part of our positive strategy so we see no reason to withdraw Policy 39. In response to Avant Home Ltd, the Council concurs with the Representation and has revised the boundary accordingly.

Proposed Changes: No (but the boundary of Cusworth Hall Historic Park & Garden has been amended in line with Avant Home’s Representation as a minor amendment to the Polices Map)

Objecting Representations from:
Avant Homes Ltd (05208; 05209 & 05210)
360 Degree Media (05307)

Policy 40: Development Affecting Archaeology

3.182 There were no Representations to this policy (notwithstanding Historic England’s Representation which is set out above)

Policy 41: Buildings or Structures of Local Historic Interest

3.183 There were no Representations to this policy (notwithstanding Historic England’s Representation which is set out above)

Chapter 12: Design & the Built Environment
3.184 The CPRE object to the policies as being ‘unsound’ as measures to incorporate low and zero-carbon design into buildings and places are not integrated or strategic. The urgent need to embrace zero-carbon as a feature of all new developments is not reflected here. The references to it in Clause 11 of Policies 43 and 45, and Policy 47(B) sit in some isolation from each other, and are treated as development management policies, whereas the role of design and place making in addressing climate change should in fact be a major strategic feature of the Plan if it is to be achieved. Proposed change: Adding an overall ‘design and place making for climate change response’ strategic policy, which refers to policies 42, 43, 45, 46, 47 as implementation policies, but also includes the importance of other characteristics, such as walkability, street trees, densities and mix of uses, and public transport connectivity, as crucial aspects of design and place making.

**Council response:** The place making aspects of climate change and low carbon design are a theme throughout the policies of the Local Plan and are picked up in numerous strategic and DM policies in addition to those that have been identified. It was considered this was a better way of covering such issues instead of having another standalone policy which would repeat topics covered under relevant other policies.

Proposed Changes: None

Objecting Representations from:
CPRE (0077)

**Policy 42: Character & Local Distinctiveness**

3.185 There were 8 Representations to the policy. Historic England support the policy as ‘sound’, especially the requirement that development should reinforce the character of local landscapes and building traditions, be of a high quality design that contributes to local distinctiveness, respond positively to their context, setting and existing site features, and integrate visually and functionally with the immediate and surrounding area. We particularly welcome the requirement that proposals will need to demonstrate an understanding of the context, history, character and appearance of the site, neighbourhood and the wider area to inform the appropriate design approach. This will help to deliver the Plan's Objectives regarding quality of place. There are a number of objections from the development industry/landowners. Although they generally support the principles of the policy, they object in particular to Part B of the policy which seeks to impose strict requirements on national house builders to justify the use of house types which have been used before or to adapt house types to complement or re-interpret local character. This policy has not been justified and it does not provide an appropriate strategy. The requirement for major urban extensions, high profile and prominent developments to provide or make a contribution towards permanent public art is not compliant with national policy. Para 56 of the Framework outlines the tests which planning obligations must meet and they must be necessary to make a development acceptable in planning terms and
directly related to the development. Neither of these points apply to large residential development schemes. There are concerns that the policy will lead to issues in relation to viability.

Council response: Support welcomed. Policy 42 attempts to encourage developers to propose homes which are suited to local character or develop new distinctive developments with strong identity suited to the local area. Persimmon Homes Yorkshire Ltd’s Representation suggests they have products which are capable of being adapted to suit local character which is what the policy is trying to achieve. Part B is not considered to be a strict requirement, but reflects good practice in terms of contextual analysis and developing a design response suited to the local area. P.15 of the National Design Guide reflects this approach. NPPF para 127c states Planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities). The Local Plan objectives include seeking to ensure our towns, suburbs, villages and countryside benefit from high quality appropriate development that reinforces distinctive and vibrant places. Public art is considered an important element to achieve this. The Council has an emerging public art strategy, and policy 42 is designed to help implement these aspirations. Many of the sites identified in the policy are Council owned and the requirement will apply equally to public sector led developments. We are successfully incorporating public art into the design of a number of public and private developments with no significant adverse effect on development viability. NPPF para 125. States that plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. The policy aims to achieve this. No robust evidence has been presented to the Council to support the assertions made in this Representations in terms of negative impacts on viability and deliverability. The Representations only raises ‘concerns’ suggests policy 42 ‘could’ impact on viability. High quality design is clearly an objective of NPPF para 124 and should therefore be factored into any development appraisal. It is not considered the requirements of policy 42 will have significantly adverse impacts on development viability. It does not necessarily follow that policy 42 will require the use of high quality materials in every case. Whilst professional fees may increase slightly in some instances, as the design team may need to re-design external elevations to be more suited to local areas, these professional fees will be marginal overall and will not result in significant viability implications. If it were to be the case that this policy (alone or in combination with other requirements) was having a significant adverse impact on viability it would be considered under policy 67 with the applicants given the opportunity to demonstrate why this is the case in exceptional circumstances.

Proposed Changes: None
Supporting Representations from:
Historic England (0016)

Objecting Representations from:
Barratt & David Wilson Homes (04955 & 04956)
Persimmon Homes Yorkshire Ltd (03431; 05289 & 05290)
Avant Homes Ltd (05211)
Metroland Ltd (05216)

**Policy 43: Good Urban Design**

3.186 There were 9 Representations to the policy. Historic England support the policy as 'sound' as it will help to deliver the Plan's objectives regarding quality of place. There were a number of objections from the development industry, although there was general support for the principles of the policy they felt it needed more flexibility. The requirement for proposals of 10 residential units or more to make use of the design review process should not be a requirement, but instead should be encouraged. A mandatory requirement for design review could adversely impact on site delivery and a flexible policy approach should be taken. As it stands, this policy is not effectively justified and does not provide an appropriate strategy. This policy should be modified to 'encourage' the use of design review rather than require it. There are also concerns that there may be viability issues ensuing from the policy.

**Council response:** Support welcomed. The policy sets out accepted objectives and principles of good urban design as a flexible framework in acknowledgement that policies should not be overly prescriptive. It is considered the policy is flexible enough whilst being clear in what it is trying to achieve. It does not solely focus on aesthetic considerations, many of the principles incorporate functional considerations such as safety, legibility, adaptability and integration. The policy also seeks to set out a process which reflects good practice. Part B specifically states this. In these respects the policy is considered flexible enough to cover different types of development and the wide ranging contexts found within the borough, it is in keeping with para 126 of the NPPF. The policy does not make design review mandatory. The first para of policy 43 states that 'Proposals for new development will be expected to follow a best practice inclusive design process and where appropriate use established design tools to support good urban design'. It goes on to say this should make use of design review. It does not state that it must. Likewise para 12.10 states 'we encourage applicants to seek design advice and independent design review prior to submission of an application' and under the bullet points 'independent design review where appropriate'. It is not considered a viability caveat is required as any development proposal would also be assessed against policy 67. Para 1.14 is clear that all policies should be read together and that individual policies do not necessarily refer to other relevant policies. If it were to be the case that this design policy (alone or in combination with other requirements) was having a significant adverse impact on viability it would be considered under policy 67 with
the applicants given the opportunity to demonstrate why this is the case in exceptional circumstances.

Proposed Changes: None

Supporting Representations from:
Historic England (0016)

Objecting Representations from:
Gladman Developments Limited (02989)
Barratt & David Wilson Homes (04955 & 04956)
Persimmon Homes Yorkshire Ltd (03431; 05289 & 05290)
Avant Homes Ltd (05211)
Metroland Ltd (05216)

**Policy 44: Views, Gateways & Taller Buildings**

3.187 There were 5 Representations to the policy. Historic England support the policy. This Policy will help to deliver the Plan’s Objectives regarding quality of place. Gladman Developments Ltd note that the policy does not identify which views, panoramas and vistas are to be protected and enhanced. For the purposes of clarity and consistency in decision-making, we consider it essential that potential views for protection and enhancement are clearly identified and set out. In addition, as set out in case law, an important view that should be protected must have some form of additional quality that would ‘take it out of the ordinary’ rather than views which may not have any landscape significance and are based solely on community support. To be valued, a view would need to have some form of physical attribute, especially since opinions on landscape are highly subjective. Therefore, without the proportionate and robust evidence required by the PPG to demonstrate why these views and landscape areas are considered special, we fail to see how Policy 44 meets the requirements set out in the Framework. Gladman therefore suggest this element of the policy is deleted as it does not provide clarity and support for a decision maker to apply the policy predictably and with confidence. It is therefore contrary to paragraph 16(d) of the Framework. Persimmon Homes Yorkshire Ltd also object in the important views outlined in part B, and expanded upon within the explanatory text (para. 12.13), are not supported by proportionate evidence. The Landscape Character Assessment is outdated and cannot be relied upon to provide robust details of important views within the District. In addition no evidence is provided for the need for the strict requirements on edge of settlement locations. The policy is therefore not justified.

_Council response:_ Support welcomed. The explanatory text at 12.13 sets out the key strategic views. These are not identified as protected views. It is not considered that every view e.g. views in Conservation Areas need to be set out in the Local Plan when the importance of these are more clearly explained within Conservation Area appraisals. Agree that development can often be located and designed without
causing unacceptable harm and can be sensitively designed to take into consideration local issues and create new views. That is why the Local Plan policies advocate a contextual design approach in other policies and at 12.14. The policy wording under 44a and 12.13 allows for enhancement, not just protection for the sake of it, and in this sense allows scope for new development where it is sensitive to the characteristics of the key view. The views are not derived from the Landscape Character Assessment. The key views are not 'protected views' under policy 43. It is not considered that the design requirements for edge of settlement locations are strict. The policy reflects existing UDP policies and seeks to draw attention to a specific important design issue and set out key considerations. If the design process advocated under policies 42-43 are undertaken properly as is good practice (see National Design Guide) the contextual analysis will identify the most appropriate design response to the settlement edge.

Proposed Changes: None

Supporting Representations from:
Historic England (0016)

Objecting Representations from:
Gladman Developments Limited (02989)
Persimmon Homes Yorkshire Ltd (03431; 05289 & 05290)

Policy 45: Residential Design

3.188 There were 5 Representations to the policy. Barratt & David Wilson Homes are generally supportive, but state that the policy should include a caveat as being subject to viability. Persimmon Homes Yorkshire Ltd concludes that it is unclear as to what constitutes adequate space, however, as the Council is seeking to introduce space standards it is requested that part B5 is removed from this policy to avoid unnecessary duplication.

Council response: It is not considered a viability caveat is required as any development proposal would also be assessed against policy 67. Para 1.14 is clear that all policies should be read together and that individual policies do not necessarily refer to other relevant policies. If it were to be the case that this design policy (alone or in combination with other requirements) was having a significant adverse impact on viability it would be considered under policy 67 with the applicants given the opportunity to demonstrate why this is the case. At this stage it is unclear as to whether the Space Standards Policy will be found sound. If it is, we are happy to delete the reference under policy 45. If it is not, then we would suggest it remains under policy 45 as a key design consideration for new homes.

Proposed Changes: None
Objecting Representations from:
Barratt & David Wilson Homes (04955 & 04956)
Persimmon Homes Yorkshire Ltd (03431; 05289 & 05290)

**Policy 46: Housing Design Standards**

3.189 There were 21 Representations to the policy. All but one were from the development industry and make very similar objections to the bulk of the policy and its requirements. Part A is seeking to implement national space standards without the requisite justification and evidence. Standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The housebuilding industry knows its customers what type and size of housing is in demand. The use of Nationally Described Space Standards, can therefore impact on the delivery of affordable products, and can serve to stifle innovative design. Would encourage the Council to recognise the larger land take such houses will require to take. Therefore to deliver this would reduce the yield of sites and could have potential implications on the site yields identified by the Council on identified and allocated sites, ultimately resulting in the Council failing to meet their housing targets. The viability assessment has applied an average house size which is stated to reflect NDSS, however the mix tested does not reflect the Policy 8 requirement. Further the viability demonstrates that site typologies in low value areas are unviable based on the base assumptions, and viability is worsened with addition of other planning requirements of the Local Plan, and in some circumstances some typologies in medium value areas were demonstrated to be unviable. The 23% affordable housing requirement has not been tested in combination with all the requirements of Policy 46 so there needs to be greater flexibility in Policy 46 with regards to the use of NDSS. Also concerned that part B is a significant increase in the requirement expressed in the earlier draft which required 30% of all housing to meet the standards of Building regulation requirement M4 (2). Generally supportive of providing homes for older and disabled persons. However, the SHMA, Economic Forecasts and Housing Needs Assessment and subsequent Housing Design Standards Policy Evidence paper unfortunately does not provide sufficient evidence and does not justify the Council's position identified in the policy. The Housing Needs Assessment 2019, whilst referred to in the background paper and Local Plan was not available at the time of writing. NPPG states that where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to requirement M4(2) and/or M4(3) of the optional requirements in the Building Regulations and should not impose any additional information requirements (for instance provision of furnished layouts) or seek to determine compliance with these requirements, which is the role of the Building Control Body. This is to ensure that all parties have the clarity and certainty of knowing which standards they have to
deal with and can factor these into their plans. For developers, this ensures that the design and procurement complications that previously arose from a series of different standards in different areas are avoided. It was recognised that it was not appropriate to apply Category 2 or 3 standards to all new homes as not all people who buy or move in to new homes need or wish to have such provision. Category 2 and 3 standards were therefore made "optional" with the position being that the case for requiring such standards in future new homes should be made through the adoption of local plan policies that have properly assessed the level of requirement for these standards in the local area, also taking into account other relevant factors including the impact on project viability. Does not dispute the population is ageing. However, it is unclear how this ageing population and potential future need reflects in the need for 65% of all new homes on sites of 10 or more dwellings to be provided at M4(2) standards. The optional higher M4(2) standard should only be introduced on a "need to have" rather than a "nice to have" basis. Although there is evidence of an ageing population having regard to the PPG this does not amount to the justification required for the Council to include the optional standard as specified in Policy 46. The Council’s housing Design Standards Policy Evidence Paper evidences the ageing population, indicating that the percentage of over 65’s grows from 18.7% to 25%, Not all people over 65 will require a new home or adapted home. Indeed the paper recognises this in para 2.53 where it states "not all of this demand will be met through new builds, and existing stock will play some part". The paper notes considers the level of people with Limiting Long Term Illnesses or Disabilities and expects just less than 40% of households will have a person with a long term health problem or disability, the majority of people with a long term health problem or disability are over 65 (60%). Thus there is not sufficient evidence to support a requirement of 65% based on evidence of need. It is important that the Council recognises the viability implications of requiring all houses to meet these enhanced standards. The whole plan viability evidence notes that all typologies in low value areas are unviable before the consideration of the impact of M4(2) and M4(3) standards. It also demonstrates that the application of M4(2) and M4(3) some typologies are unviable in medium value areas, when tested against a base assumption for affordable housing of 15% and not 23% as sought through Policy 8. Therefore, consider that this could result in stalled development where time is taken to debate viability issues. The Council must be mindful that it is unrealistic to negotiate every site on a one by one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery. Urge the Council to reduce the percentage requirements to ensure the deliverability of any policy. The policy must not be set at such a scale that will threaten development to be in line with the Framework and guidance established in PPG.

3.190 Anglian Water Services Ltd state that the policy should be amended to require the optional higher water efficiency standard for residential developments (110 litres per person, per day).
Council response: The Council has addressed these issues within the evidence paper. The implication of the NDSS will not change the dwelling size of new builds in terms number of bedrooms, it is the quality of each bedroom. With a set standard of decent bedroom sizes and adequate storage space, future home buyers, including those on lower incomes, may feel they do not need to buy a larger house with an increased number of bedrooms, thus offering them a cheaper, more affordable and quality option. For example they may then only need to buy a good quality 2 bed property rather than a more expensive 3 bed with insufficient bedroom sizes and storage. The Council acknowledged this point about innovation in the drafting of Policy 46 and points to the allowance of a potential deviation from the NDSS through being robustly justified and offset through exceptional or innovative design, outlined within the Policy and explanatory text. The Council rejects the idea that the implementation of the NDSS would have a negative impact on the yield of sites, and consequently resulting in the Council failing to meet their housing targets. The Council has addressed the plot size of dwellings required to meet the standards compared to the survey sample in the evidence paper. The viability testing (Pg 55) explains why it has taken an overall average dwelling size approach given the vast number of variable combinations/appraisals that would result otherwise e.g. different sizes are prescribed depending on number of bedrooms, number of persons and number of storeys. Policy 8 does not prescribe a set mix of housing, but states that sizes, types, price and tenure should address needs and market demand identified in the latest SHMA or other robust evidence. The viability testing considers a number of different viability scenarios. This includes the 'base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost' developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in. The Council acknowledges that the Publication version includes a higher percentage requirement for Policy 46 B), however the figures presented during the informal consultation were not fixed and at the time the evidence base was still under preparation. This policy requirement has been developed using the evidence in the Housing Design Standards Evidence Base. The Council feels the evidence provided meets the requirements set out in the PPG for the implementation of the policy. The PPG sets out the evidence required for the standards the Council is implementing in Policy 46. For standards reflecting accessibility and adaptability, evidence is required to show the likely future need, size, location, type and quality of dwellings needed, evaluation of existing stock, how needs vary across tenures and viability impact. For standards impacting space, evidence is required to show need, viability and timing. The evidence paper uses a range of local and national data sources to demonstrate each of the required sections, as well as analyse the data holistically. The Housing Needs Survey 2019 is available online. The Council has robustly outlined why the
policy has stated a requirement of 65% within the evidence paper. The evidence base, and policy percentage requirement, acknowledges that the existing stock will play some part with the emerging population demographic change. However, the existing stock can only play a limited part in the establishment of appropriate homes in Doncaster as outlined within the evidence paper. The Council has outlined why the policy has stated a requirement of 65% within the evidence paper. No robust evidence has been provided by the representations to demonstrate viability is an issue. The evidence paper presents the findings from the two Council Local Plan Viability studies that have fed into the development of the Local Plan, which was informed by information from (and workshops with) the industry. The evidence paper also presents the additional costs of the standards as presented in the Government's impact assessment at the time which highlight a minimal increase in build costs. This is also considered alongside other societal benefits of the standards that were acknowledged in the Government's impact assessment. The Council has also included in the policy the provision for applicants to robustly demonstrate, with appropriate evidence, that adhering to the standards is not viable.

No substantive evidence has been found, or provided to the Council, demonstrating a need for the optional water standards in the Anglian Water area or within the wide Borough. Anglian Water only serves a small part of the Borough for sewerage on the south eastern extreme of the Borough boundary. Clean water is provided by Yorkshire Water and Severn Trent, neither of which have raised water availability as an issue and therefore this optional requirement has not been viability tested. The government commissioned Water stressed areas – final Classification, July 2013, developed by the Environment Agency and Natural Resources Wales does highlight Anglian Water as having a higher propensity for water stress, but both other utility suppliers in the vast majority of the Doncaster area are identified as having moderate stress which is categorised as not serious.

Proposed Changes: None
Objecting Representations from:
The Home Builders Federation (0129)
Gladman Developments Limited (02989)
Barratt & David Wilson Homes (04955 & 04956)
Persimmon Homes Yorkshire Ltd (03431; 05289 & 05290)
Strata Homes Yorkshire Ltd (02073)
Mr Paul Burtwistle (03506 & 03507)
Framecourt Homes (05176)
Avant Homes Ltd (05208; 05209; 05210 & 05211)
Priority Space Ltd (05213)
Firsure (05215)
Metroland Ltd (05216)
Quod Ltd (05250)
Mr R.J. Ogley (03008)
Anglian Water Services Ltd (0031)
Policy 47: Design of Non-residential, Commercial & Employment Developments

3.191 There was a single Representation to the policy from Historic England supporting the policy as ‘sound’ as it will help to deliver the Plan’s Objectives regarding quality of place and the historic environment.

Council response: Support welcomed.

Proposed Changes: None

Supporting Representations from:
Historic England (0016)

Policy 48: Safe & Secure Places

3.192 There were no Representations to the policy.

Policy 49: Landscaping of New Developments

3.193 There were 6 Representations to the policy. The Canal & Rivers Trust continue to welcome the reference in part A which aims to maximise links/access to Open Space, which would benefit the wellbeing of new (and existing) communities. Barratt & David Wilson Homes are generally supportive, but request the policy be revised to assess impact on viability. Persimmon Homes Yorkshire Ltd conclude that Part C’s requirement for ‘generous tree, shrub and hedgerow planting’ and the explanatory text that states that 1 tree per dwelling is required is not evidenced and therefore not justified.

Council response: Support welcomed. The policy requirements reflects existing requirements in the Council’s adopted SPD which has been in operation for a number of years without any significant adverse implications or viability issues. It is not considered a viability caveat is required as any development proposal would also be assessed against policy 67. If it were to be the case that this design policy (alone or in combination with other requirements) was having a significant adverse impact on viability it would be considered under policy 67 with the applicants given the opportunity to demonstrate why this is the case. This is a clear objective and easily measurable target to deliver the environmental benefits of tree planting. It exactly reflects an existing requirement in the Council’s adopted SPD which has been in operation for a number of years without any significant adverse implications or viability issues. Persimmon Homes Yorkshire Ltd have already adequately met this requirement on a number of sites in the Borough without disagreement with the Council.

Proposed Changes: None

Supporting Representations from:
Canal & River Trust (03089)

Objecting Representations from:
Barratt & David Wilson Homes (04955 & 04956)
Persimmon Homes Yorkshire Ltd (03431; 05289 & 05290)

Policy 50: Advertisement & Signage

3.194 There was a single Representation to this policy from Historic England whom support the policy as ‘sound’, especially the requirements that any advertisements should not harm the significance of a listed building, Conservation Area, or other designated heritage assets. This will help to deliver the Plan's Objectives regarding quality of place and the historic environment.

Council response: Support welcomed.

Proposed Changes: None

Supporting Representations from:
Historic England (0016)

Chapter 13: Health, Wellbeing & our Communities

Policy 51 – Health

3.195 There were 7 Representations to the policy. Persimmon Homes Yorkshire Ltd object to the lack of clarity as to what is meant by part D of the policy and whether this is in relation to developer contribution’s. Barratt & David Wilson Homes also object to policy requirement for Health Impact Assessments and conclude these should be part of the application validation checklist instead. United Kingdom Onshore Oil & Gas and IGas Energy PLC state that where development is subject to Environmental Impact Assessment, health impacts should be included in that process. It is considered a separate HIA should not be a requirement of development (F) and should only be required on a case-by-case basis.

Council response: Policy 51 suggests that healthcare infrastructure implications of any relevant proposed development have been considered and addressed. This may include additional consultation with healthcare providers to ensure the proposed development will improve and promote strong, vibrant and healthy communities. Doncaster’s local validation checklist does include a Health Impact Assessment to be submitted with planning applications when determined by the Planning Authority. They enable the decision making process to consider the ever-increasing demand on planning authorities to create healthy places and promote healthy behaviours and environments and reduce health inequalities for people of the borough. NPPF paragraph 91 states planning policies... should aim to achieve healthy, inclusive and safe places... enable and support healthy lifestyles.
Policy 52 – Protection of Education, Community & Leisure Facilities

3.196 There was a single Representation to this policy by the Theatres Trust. They support the policy and consider evidence set out in 12.8 will protect valued facilities and is consistent with para.92 of the NPPF. They welcome that para. 13.10 makes clear the policy applies to theatres alongside other cultural facilities which accords with the NPPF.

Council response: Support welcomed.

Objecting Representations from:
Persimmon Homes Yorkshire Ltd (03431; 05289 & 05290)
Barratt & David Wilson Homes (04955 & 04956)
United Kingdom Onshore Oil and Gas (05014)
IGas Energy Plc (05129)

Policy 53 – New Education Facilities

3.197 The only Representations to the policy were from Persimmon Homes Yorkshire Ltd. There is no clear and transparent process for determining how and when on-site education provision is required. The explanatory text states that in some cases that some individual or mixed-use proposals could be large enough to generate the need for new schools. The Policy should provide clear guidance on what would trigger such a requirement. The site-by-site nature of the assessment gives uncertainty for developers. This could affect the deliverability of sites and affect the ability of the Borough to meet its housing need. The policy needs further revision to clarify to ensure that it is clear and transparent.

Council response: Policy 66 sets out developer contributions, Policy 53 considers new education facilities in line with NPPF (para. 94) and PPG requirements.

Objecting Representations from:
Persimmon Homes Yorkshire Ltd (03431; 05289 & 05290)

Policy 54: Provision of New Indoor Recreation & Leisure Facilities

3.198 There were no Representations received to this policy.
Policy 55: Pollution

3.199 There were 8 Representations received to the policy. Severn Trent Water Ltd support the policy. The Environment Agency object that the policy does not make reference to Source Protection Zones (SPZs) or appropriate mitigation. Additionally do not feel the policy is ambitious enough and expect a commitment to not supporting proposals which could adversely affect surface or ground waterbodies and support those that would maintain and ideally enhance waterbodies (quantity, quality and ecological features). Yorkshire Wildlife Trust likes the consideration of protected species within the policy, but request an amendment to part E to change the word 'or' to 'and' to say 'conservation of biodiversity and protected species'. Requesting additional explanation (13.22) to consider how lighting can be designed to minimise impacts to protected species and notable habitats, which should include consideration for the BCT Guidance note (due to be regularly updated from 2020). Request for ‘lux’ contour plans not averages to show dark corridors (particularly for Nightjar). Cadeby Parish Council note that light pollution is only mentioned twice in the draft Plan. Whilst they agree that it is important that it is a consideration under this policy, a strategy to reduce the Borough’s overall light pollution should be a consideration of the Plan. The Mineral Products Association request additions to the policy in respect to the agent of change principle. United Kingdom Onshore Oil and Gas, INEOS Upstream Ltd, and IGas Energy plc make similar comments in that the impacts associated with oil and gas development are regulated by the EA through environmental permits (includes venting and flaring). Site containment plans are also required by EA to address surface and groundwater. The role of EIA needs to be clearly stated in the policy and justification text to avoid confusion.

Council response: In response to the EA, SPZs were being proposed to be dealt with via Policy 61: Protecting & Enhancing Doncaster's Soil & Water Resource part E2 and explanatory text paras 14.28-14.30, but given the importance of this issue, and that there are numerous SPZ’s across the Borough, then in addition Main Modifications are proposed to the policy and explanatory text. The Council's view is that Policy 61 Part E covers matters in relation to not supporting proposals which could adversely affect surface or ground waterbodies etc. In response to Yorkshire Wildlife Trust, the suggested tweak to the policy is accepted as a minor amendment. Additional explanatory text in respect to guidance and light pollution has been put forward as a suggested change. In response to Cadeby Parish Council, it is considered that the policy meets NPPF and PPG requirements. In response to Mineral Products Association, it is proposed to include wording in respect to Agent of Change Principle in the policy as a suggested amendment. Policy 55 is not just aimed at hydrocarbon development proposals. Where required Planning and Pollution Control will work with and liaise with the EA as required by NPPF/PPG.

Proposed Changes: Yes – additional policy wording and supporting text are proposed to address the Representation from the EA, Yorkshire Wildlife Trust, and Mineral
Products Association – see schedule of Suggested Changes (Doc Ref: CSD5) and Minor Amendments (Doc Ref: CSD6).

Supporting Representations from:
Severn Trent Water Ltd (04496)

Objecting Representations from:
Environment Agency (0014)
Mineral Products Association (04371)
Cadeby Parish Council (0739)
Yorkshire Wildlife Trust (01546)
United Kingdom Onshore Oil and Gas (05014)
IGas Energy Plc (05129)
INEOS Upstream Ltd (05058)

Policy 56 – Contamination & Unstable Land

3.200 There were 5 Representations to the policy. The Coal Authority and Severn Trent Water Ltd support the policy. The Environment Agency would like inclusion of requirement for developers to undertake a Preliminary Risk Assessment where current/former uses may have led to land contamination. United Kingdom Onshore Oil and Gas & IGas Energy Plc state that many of the criterion in the policy are regulated by the EA and that this should be stated in the policy explanation.

Council response: The Council accepts the response from the EA and it is proposed to include additional wording in the explanatory text as a Suggested Change. The role of regulators is covered in PPG (Paragraphs 014 and 110.) NPPF and PPG not required to be duplicated in the Local Plan.

Proposed Changes: Yes – additional supporting text is proposed to address the Representation from the EA – see schedule of Suggested Changes (Doc Ref: CSD5).

Supporting Representations from:
The Coal Authority (01223)
Severn Trent Water Ltd (04496)

Objecting Representations from:
Environment Agency (0014)
United Kingdom Onshore Oil and Gas (05014)
IGas Energy Plc (05129)
Chapter 14: Climate Change, Mineral Resource & Energy

3.200 Mr John Hoare objects on the basis that the plan fails to recognise that climate change requires attention across all areas, not just flooding, drainage and low carbon energy generation. Transport is a high producer of carbon emissions but other areas of the economy are seeing reductions. Endorsing the Airport is contrary to any policy to reduce the damage of climate change and is a 'serious contradiction' of the plan.

Council response: Climate change is a theme that runs through the heart of the local plan, including spatial strategy and overall approach as well as some of the detailed policies. Local Plan paragraph 14.2 identifies how the plan will help Doncaster adapt to climate change.

Proposed changes: None

Representations from:
Mr John Hoare (01880)

Policy 57: Drainage

3.201 There were 8 Representations to the policy. The Canal & River Trust welcome the identification in part F) of the potential for drainage to their watercourses, and the requirement for prior approval of the navigation authority. The Trust do allow drainage into their network, where practical and where a necessary license and agreement can be made. Severn Trent Water Ltd supports the policy as it is essential that for the long term management of a sewerage system and development of a sustainable water cycle that surface water runoff is controlled in an appropriate way, the utilisation of SuDS represent the most sustainable and adaptable approach. The policy continues to highlight the use of the Drainage Hierarchy. Directing surface water to sustainable outfalls such as infiltration or watercourses, is preferable to connecting to the public sewerage system. Anglian Water Services Ltd conclude that the policy should be amended to ensure that where a connection to the public sewerage network is required the risk of flooding within the surface water sewerage network is considered at application stage. Persimmon Homes Yorkshire Ltd object in that part D seeks an outright prevention of new culverting of existing watercourses. In designing development proposals, they would always seek to avoid culverting. However, there are times when it may be necessary to culvert (for example, to achieve a safe access point). This policy should be re-worded to provide sufficient flexibility so that the impact of culverting can be judged on a case-by-case basis. United Kingdom Onshore Oil and Gas and IGas Energy Plc note that site drainage for onshore oil and gas is permitted through the EA and that this should be identified in the policy explanation.
Council response: Support welcomed. Anglian Water Services Ltd seeks additions to the policy wording, but the explanatory text at para 14.5 already clearly states this expectation and is considered sufficient therefore. DMBC has an anti-culverting policy in order to avoid the challenging maintenance involved with culverts and to aid ease of inspection. The policy states that we aim to avoid new culverting therefore, however we would take any application on a case by case basis and, if culverting is the only practicable option, this would be permitted. The role of regulators is covered in NPPG (Paras 014 and 110 for hydrocarbons.) NPPF and NPPG is not required to be duplicated in the Local Plan.

Proposed Changes: None

Representations from:
Anglian Water Services Ltd (0031)
Canal & River Trust (03089)
Persimmon Homes (Yorkshire) Ltd (03431; 05289 & 05290)
Severn Trent Water Ltd (04496)
United Kingdom Onshore Oil and Gas (05014)
IGas Energy PLC (05129)

Policy 58: Flood Risk Management

3.202 There were 6 Representations to the policy. Severn Trent Water Ltd are supportive of the policy. Development in low-lying areas such as flood zones can result in increased deterioration and ineffective sewerage systems. Don Parkinson Partnership is supportive of the policy as it is appropriate that the Council is seeking to confine areas of search within the same settlement. However, the Environment Agency object raising their previous comments that there is no justification for applying the flood risk sequential test to individual settlements (Part c of the policy) as part of windfall development when the starting position of national policy would be a borough-wide area of search.

Council response: Support welcomed. The justification for the area of search being based on a settlement level is set out within the Appendix to the Flood Risk Topic Paper; this paper was shared with the Environment Agency alongside the Publication version of the plan at Regulation 19 stage and was drafted to address their objection raised to the 2018 consultation version of this policy which proposed the same approach. The Representation is considered to have been addressed via the Topic Paper therefore.

Proposed Changes: None

Supporting Representations from:
Severn Trent Water (04496)
Don Parkinson Partnership (05294; 05295; 05296 & 05297)
Objecting Representations from:
Environment Agency (0014)

**Policy 59: Low Carbon & Renewable Energy**

3.203 There were 4 Representations to the policy. Historic England and Canal & River Trust support the policy as being ‘sound’. Marr Parish Council support the delivery of renewable energy. However, concern is expressed as to how this will be achieved and whether this is to mean delivery by wind turbines and solar farms on Green Belt land. Would prefer to see solar installations on all new builds and large commercial rooftops and a managed roll out to existing residential areas. The CPRE object that the policy is ‘unsound’ as it is not positively prepared to address national carbon reduction targets and does not set a low carbon/renewable energy generation target. They also claim it is not justified in relation to the available evidence, especially the Committee on Climate Changes report on meeting net zero carbon by 2050. Finally, they claim it will be ineffective as the policy will be unlikely to help deliver the radical carbon reductions needed or contribute enough to low energy. No targets/milestones have been set and it does not encourage or priorities community engagement in community energy schemes and is inconsistent with national targets (CCC five year carbon budgets) to radically reduce carbon emissions by 2035.

**Council response:** Support welcomed. The wind energy policy 60 seeks to direct wind turbines to areas with the most capacity to accommodate them, including land outside the Green Belt. Policy 47b has a requirement that all new major commercial developments must provide 10% of their energy from renewable sources and large footprint buildings should ensure roofs are designed to accommodate the potential for solar panel arrays. The most efficient way of reducing residential energy use is through enhanced insulation/fabric efficiency which it is anticipated will be improved over coming years through the Building Regulation changes indicated by Government and green initiatives for existing homes such as was implemented previously through the Green Deal. Local Plan policy 59A5 supports and prioritises micro-renewable energy schemes. In response to CPRE, as far as the Council is aware, there is no requirement for LPAs to set renewable energy generation targets in the Planning and Compulsory Purchase Act 2004 or the NPPF. The NPPG specifically says ‘Whilst local authorities should design their policies to maximise renewable and low carbon energy development, there is no quota which the Local Plan has to deliver’ (para 003). It is considered policies 59 and 60 alongside other Local Plan policies, provide a supportive framework. They provide a positive strategy for energy from renewable and low carbon energy sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily. Suitable areas for renewable and low carbon energy sources are identified on the Policies Map including areas of search for wind energy and heat opportunity areas. Policy 47 b has a requirement that all new major commercial developments must provide 10% of their energy from renewable sources and Large
footprint buildings should ensure roofs are designed to accommodate the potential for solar panel arrays. The NPPF states at 152 'Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning'. It is not therefore considered necessary to repeat this under the Local Plan policy. However it is acknowledged the policies could be reframed to better support community energy schemes.

Proposed Changes: None

Supporting Representations from:
Historic England (0016)
Canal & River Trust (03089)

Objecting Representations from:
Marr Parish Council (0746)
CPRE (0077)

Policy 60: Wind Energy Developments

3.204 There were 8 Representations to the policy. Historic England and Network Rail both support the policy as being 'sound'. The Environment Agency expect specific reference to other watercourse at part I of the policy. The CPRE object to the policy not being 'sound' as it is not positively prepared to address national carbon reduction targets and no low carbon/renewable energy generation targets set. Clarification needed on the meaning of "directed towards" the respective landscape capacity areas in 60 A and B. Once applications are submitted, they will either be largely within or without the defined capacity areas. It is unclear what the burden on the scheme proposer is. Text at para. 14.19 refers readers to Figure 13. We believe it is also necessary to reproduce the full Landscape Capacity for Windpower plan (Figure 10 in the 2006 ECUS study; shown at Appendix A in the supporting document Wind Energy Development Policy: Local Plan Evidence Base (DMBC, July 2019) to ensure clarity regarding the borough wide sensitivity analysis. Barnby Dun with Kirk Sandall Parish Council object that any development should be sited to the west of the River Don floodbank and this submission has inadequately been addressed even though the Parish Council was asked to be fully engaged in the process. Site boundary should be revised and residents have been ignored. Daniel Meekin states the area of search for wind turbines/actual turbines themselves should not be located so close to villages and communities. Should be located to the west of Thorpe Marsh and need to define what is a 'significant distance'. The Joint Rural Parishes believe the local plan needs to make reference to any existing wind farms/permissions or is otherwise miss-leading. EON object to the policy as being 'unsound' because it is based on out-of-date evidence which does not include 'Areas of search' for sites developed post 'Landscape Character Assessment (LCA) (2007/7). It is critical that 'Areas of search' identified are based on up to date and robust evidence. The
landscape character assessment (2006/7) that underpins the Policy is out of date. The Tween Bridge site should be included as an area Of Search. The evidence for Tween Bridge is clearly challengeable as it was granted planning permission following a public inquiry (2007). Future development could be assimilated successfully at Tween Bridge. The Council must therefore update its Landscape Character Assessment and also include Tween Bridge as an area of search on the Policies Map. Also included with the representation is a 'Scoping report for the windfarm extension in the context of European Nightjar movement' which concludes there is little evidence of conflict between Nightjars and windfarm.

**Council response:** Support welcomed. It is proposed to include reference to watercourses to address the Environment Agency’s comment. As far as the Council is aware, there is no requirement for LPA’s to set renewable energy generation targets in the Planning and Compulsory Purchase Act 2004 or the NPPF. The NPPG specifically says 'Whilst local authorities should design their policies to maximise renewable and low carbon energy development, there is no quota which the Local Plan has to deliver' (para 003). It is considered policies 59 and 60 alongside other Local Plan policies, provide a supportive framework. They provide a positive strategy for energy from renewable and low carbon energy sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily. Suitable areas for renewable and low carbon energy sources are identified on the policies map including areas of search for wind energy and heat opportunity areas. Policy 60 A is very clear that medium to large-scale proposals are directed toward areas with the highest relative landscape capacity within the Area of Search for Wind Energy Developments as shown on the Policies Map. The NPPF states at 152 'Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning'. It is therefore considered necessary to repeat this under the Local Plan policy. However it is acknowledged the policies could be reframed to better support community energy schemes. In response to Barnby Dun with Kirk Sandall Parish Council, no evidence has been provided to demonstrate why this change would be needed and it is considered that the criteria are robust enough to manage any negative impacts on local communities. It is clear the local community would prefer to see the area of search boundary further from the edge of the settlement to the west of the River Don flood defences and this would need to be considered as part of the community engagement policy 60 requires. In response to Daniel Meekin, it is not considered appropriate to set out specific stand-off distances within the policy as there may be instances when a proposal is acceptable below a stand-off distance depending on the size of the turbine and it's proposed location- for example if there was an area of intervening woodland between a property and a moderate scale wind turbine. NPPG states that LPA’s should not rule out otherwise acceptable renewable energy developments through inflexible rules on buffer zones or separation distances. Other than when dealing with set back distances for safety, distance of itself does not necessarily determine whether the
impact of a proposal is unacceptable. Distance plays a part, but so does the local context including factors such as topography, the local environment and near-by land uses. Disagree with the Joint Rural Parishes that the Local Plan needs to list existing permissions, but a clearer list in the Infrastructure Strategy would be useful. In response to Eon, the Area of Search is based, in part, on the council’s landscape evidence base and is considered to be justified and consistent with national policy. It is noted that the policy does not exclude such proposals from coming forward in other appropriate locations and subject to all other relevant policies in the plan.

Proposed Changes: None

Supporting Representations from:
Historic England (0016)
Network Rail (0198)

Other Representations from:
Environment Agency (0014)

Objecting Representations from:
CPRE (0077)
Barnby Dun with Kirk Sandall Parish Council (01263)
Daniel Meekin (04517)
The Joint Rural Parishes (04013)
Eon (05136)

Policy 61: Protecting & Enhancing Doncaster’s Soil & Water Resources

3.205 There were 7 Representations to the policy. Severn Trent Water support the policy, in particular Bullet point E. The protection of water resources will be vital to providing potable water for future growth and development. Anglian Water note that the supporting text has been updated to refer to groundwater sources and how development proposals will only be acceptable where pollution risks can be mitigated as well as the requirements of the Water Framework Directive which addresses their previous comments to the draft policy. The Environment Agency object on the basis that the policy is not ambitious enough and recommend wording in respect to supporting proposals that make positive progress towards achieving ‘good’ status or potential under Water Framework Directive. Also, although the SA previously indicated that issues around water availability and efficiency had been considered in the development of the plan, there are no explicit references in the plan itself in respect to water availability, water efficiency, drought or Catchment Abstraction Management Strategies which is concerning and suggests that water resource matters have not been fully addressed. Natural England note that the Council are still waiting for further information from Yorkshire Water. The information that is ultimately provided will need to be incorporated into a future draft of the Habitat Regulations Report and any further assessment and/or necessary recommendations.
made at that point. It appears there are safeguards in the plan to outline that infrastructure needs to be in place to meet demand (Policy 57 requires developments to ensure they have an adequate means of foul sewage disposal). However if developers are unable to demonstrate this the application(s) will fail so there is no threat to the designated site. What this means for deliverability is for the LPA to outline and demonstrate. The safeguards provided in the plan ensure that waste water infrastructure should be in place to meet the demands of new development. This protects designated sites in terms of avoiding overcapacity and negative effects as a result. How this affects deliverability of housing sites is not something Natural England would comment on. Natural England endorses policy requirements in the NPPF in terms of ensuring sufficient infrastructure provision (para 20, NPPF), including infrastructure for waste water, to ensure policies in plans are deliverable and planning applications can progress. CPRE object that the policy is ‘unsound as it is not positively prepared in relation to identified need to store water, but without specific related proposals / policies and will be ineffective in fully integrating extensive forms of land based energy generation schemes in the policy. Supporting text para 14.25 does not cover likely energy generation related proposals and reference should be specifically made. Text 14.32 does not offer policies or spatial plans to plan positively for these. Barratt & David Wilson Homes objects to Part A stating that it does not conform to NPPF footnote 53 which should be only where significant areas of best and most versatile agricultural land will be lost.

**Council response:** Support welcomed. In response to Anglian Water Services Ltd, surface water is also covered in policy 57 which states that development sites must incorporate satisfactory measures for dealing with their drainage impacts to ensure waste water and surface water run-off are managed appropriately. Section F of policy 57 identifies the appropriate networks for dealing with surface water runoff. Groundwater is also referenced in paragraph 14.28 of policy 61 explanatory text. In response to the Environment Agency, it is proposed to make an amendment to policy text part E (Main Modification) with existing Part E becoming Part F to address these concerns. It is also proposed to add an additional criteria to Policy 61 to address these concerns. In response to Natural England, the Council has attempted to engage with Yorkshire Water throughout the local plan process to date. For example, proposed site allocations have been sent in GIS format to assist with their own service planning and in order to allow them to assess the sites in terms of capacity of their utility network, in particular waste water treatment. Due to resource issues at Yorkshire Water, the organisation has made it clear that they are no longer resourced to be able to respond to development plans. The remainder of the Borough is served by Seven Trent Water (with Anglian Water serving a small inset around the Airport). Both of these utility providers have engaged with the local plan, for example see Representations made by both to the Regulation 19 plan. It should be noted that a number of upgrades to Yorkshire Water's waste water treatment network were made in recent years and as the Representation notes, Policy 57 requires development to ensure adequate means of foul sewage disposal. Possible
risks to delivery are noted, but as set out in response to Policy 3 and 6, there is a significant allocation above the requirement which provides flexibility should occasional sites not come forward as envisaged. In response to CPRE, Para 14.28 of the Local Plan acknowledges Doncaster overlies two principal aquifers and the Magnesian Limestone. Sherwood Sandstone is the second most important source of ground water in the UK. However, ground water supplies within both aquifers are relatively low due to over abstraction. We acknowledge the aquifers replenish over time through percolating rainwater and the EA will generally refuse new abstraction licenses in these areas. NPPF does not make explicit reference to solar energy and uses the term 'renewables'. NPPG covers solar farms. these are classed as temporary development and conditions are required to ensure the land is restored to its previous use. NPPG paragraph 013 identifies the planning considerations that relate to large scale ground-mounted solar photovoltaic farms and NPPG is not required to be repeated in the Local Plan. In response to Barratt & David Wilson Homes, the word 'significant' does feature in policy 61 and is therefore NPPF compliant.

Proposed Changes: Yes – to address objection raised by Environment Agency – see schedule of Suggested Changes (Doc Ref: CSD5).

Supporting Representations from:
Severn Trent Water Ltd (04496)
Anglian Water Services Ltd (0031)

Other Representations from:
Natural England (03820)

Objecting Representations from:
Environment Agency (0014)
CPRE (0077)
Barratt & David Wilson Homes (04955 & 04956)

Minerals Policy

3.206 There were a number of general Representations to the mineral part of the Chapter as follows. The Environment Agency comment that a number of points that they previously made in respect to groundwater protection have not been accepted. Marr Parish Council state that it is vital to assess the value of minerals before any development takes place and the impact on environment, landscape and local communities is fully understood. No homes should be developed near potential mineral sites which may hamper or prevent extraction. The Mineral Products Association identify the need for additional policies in respect to transport infrastructure and ancillary infrastructure safeguarding.

Council response: In response to the EA, it is considered that Policy 55 amendments as per the above provides a strong policy framework (noting that Policy 61 also relates to SPZs) for all development, including minerals, so our response to Policy 55 now should address these concerns as well as all policies in the plan where
relevant will be applied. In response to the Minerals Products Association, minerals ancillary infrastructure (such as wharves) is protected through policy 62A.7. As required by NPPF para 204e. Applications pertaining to ancillary minerals infrastructure will be determined in line with NPPF/NPPG and relevant policies within the local plan. See also policy 13. D3 for wharf facilities and key waterways, which encourages improving the efficiency of freight transport by navigable waterways.

Proposed Changes: None (but note changes to other policies to address EA objection)

Representations from:
Environment Agency (0014)
Marr Parish Council (0746)
Mineral Products Association (04371)

Policy 62: Providing for & Safeguarding Mineral Resources

3.207 There were 12 Representations to this policy. The Coal Authority supports the inclusion of the Policy. North Yorkshire County Council supports the policy and the Safeguarded area boundary matches with their own. Also support reference to 'Agent of Change’ in supporting text. East Riding of Yorkshire Council does not raise any objection to the wording of policies and the policy wording is appropriate. However in order for the policy to be as effective as possible and positively act to meet aggregate needs, land banks need to be appropriately monitored through the Local Aggregates Assessment (LAA). East Riding has an issue with the LAA monitoring figures being inflated by low 10 year average sales which provide no imperative to allocate encourage or permit additional sand and gravel to come forward because the sand and gravel land bank far exceeds the required 7 years. Historic England object that the policy makes no reference to how it will address historic sources of building stone. Edlington Town Council support the local plan stating, in respect to Stainton Quarry and not supporting provision for any extension of the Quarry activity for wider limestone mineral extraction. The Town Council support the comment on there being sufficient land banked mineral supplies for the next 25 years and do not want to see any further extension beyond that which is regulated by the existing permission or any encroachment further towards Edlington/Old Edlington. Marshalls PLC supports the continued allocation of the Maltby/Stainton site (Site Ref: 006 Holme Hall Quarry) as a 'Safeguarded Ancillary Minerals Infrastructure' site. FCC Environment supports the policy which is considered to be in line with paragraph 203 and 204 of the NPPF. As such, the Local Plan Publication Draft is considered to be consistent with national policy. Under the Submission Policies Map and as illustrated on Table 15 in the Local Plan Publication Draft, FCC’s Barnsdale Bar landholding is located within a Minerals Safeguarding Area. FCC support this allocation and are currently investigating the potential to extend the existing Barnsdale Bar Quarry to the south between Woodfield Road and Long Lane.
3.207 North Lincs Property supports the inclusion of Land at Grange Farm, as a proposed new mineral allocation (Site Ref: 1011). Site offers approximately 1.55 million tonnes of sand and gravel mineral reserve. North Lincs Property Holdings want to include land at Ninescores Farm, Finningley, Doncaster, DN93DY (land adjacent site to Grange Farm) (site extension). Ninescores Farm, has an Interim Development Order (IDO) providing approximately 400,000 to 600,000 tonnes of additional sand and gravel reserve. The composite application proposal, will enable mineral reserves to be blended on Site, ensuring that the locally and regionally scarce mineral reserves found at the Site (i.e. the sharp sand / concreting aggregates). Grange Farm area 40ha and Ninescores Farm 24ha. The proposal will contribute an estimated reserve 2.1Mt. The Representation highlights the Core Strategy, Emerging Local Plan and 2018 LAA. 'Historic returns have confirmed that only a small proportion of the remaining permitted reserve in Doncaster is however suitable for use as concreting aggregate'. Proposal complies with NPPF paragraphs 203 and 205. Proposal compliant with Core Strategy CS20 and emerging Local Plan Policies 62, 63, 64. The Proposed Development fulfils a number of strategic objectives including sustaining sand and gravel mineral production, retaining jobs and supporting wider economic development, which ultimately support and complement the objectives of the emerging Doncaster Local Plan. Overall, we support and commend the allocation of Grange Farm as a preferred minerals site.

3.208 The Mineral Products Association and Sibelco UK Ltd both propose a number of amendments to the policy wording. Peel Land & Property Management Ltd state that the policy and proposals appears to identify specific areas of the borough which are existing minerals areas of search and areas which are safeguarded. It is not clear if the policy is the definitive position on mineral workings or safeguarding across the borough as it would appear the safeguarding area to the west of the airport has been removed. For completeness, clear and categorical confirmation within the Local Plan that any mineral safeguarding area which was previously identified with the airport masterplan is removed and the plan/map should make this clear. The masterplan area and airport is the borough's biggest economic asset and should not be unnecessarily constrained in its delivery. The CPRE object on the basis that the policy is inconsistent with national targets to reduce carbon emissions radically by 2035. Policy 62 is not properly reflective of the Government’s policy to meet a carbon net zero target by 2050 by overstating the need for oil and gas which will be inconsistent with future carbon budgets. Rationale for 14.41 is unclear. Proposed changes to the policy are provided.

**Council response:** Support welcomed. In response to East Riding of Yorkshire Council, the Local Plan and 2018 LAA identifies a 5.6Mt reserve and land bank of 18.1 years for sand and gravel based on ten year average sales (which does include periods of low sales). The plan also acknowledges a short fall in sharp sand and gravel evidenced from previous annual surveys (see paragraph 14.47). Doncaster Council has identified other information in the Local Plan to identify 'Local Provision'. The Local Plan evidence base includes information identifying the depletion of sharp
sand and gravel resources. Doncaster disagrees that the land bank has provided little imperative to encourage or permit additional supplies of sharp sand and gravel. The amount of available sharp sand and gravel and not the 'land bank' has been the principle driver for allocating sites since the adoption of the 2012 Core Strategy. This principle is retained in the Local Plan. See policy 65 A.5. Which states applications need to demonstrate at least 20% sharp sand and gravel. The 2019 LAA (ratified by the Y&H AWP in October 2019) shows land banks based on 10 year and 3 year averages. This 3 year average NPPG para 064) is used to identify short term trends and identifies that if extraction continues at the current rate the sand and gravel reserve will last only 9.8 years. In terms of ten year average sales or three year average sales for use in considering whether it might be appropriate to increase supply, this is only possible if resources are available. The Local Plan allocates all appropriate sand and gravel representations received and goes further to allocate extensive areas of search to allow for the minerals industry to explore for any remaining resources in the area. Given that each LAA has been ratified by the Y&HAWP it should be acknowledged that the evidence base supporting the Local Plan is sound. In response to Historic England, the Policy is inclusive of building stone as set out in the opening preamble to the policy text. The explanatory text at para. 14.51 provides further details. In response to North Lincs Property, the site is allocated in the Local Plan as there is a need for sharp sand and gravel in Doncaster. The additional site (NineScores Farm) has been identified as a late site addition, which has not been fully assessed therefore. If the proposal comes forward as an application before the Local Plan is progressed the application will be assessed using the Core Strategy and UDP policies. In response to the Mineral Products Association and Sibelco Uk Ltd, the policy is worded in a way that provides flexibility, addresses sustainability, and meets with the NPPF requirements of being positively prepared. Policies are not required to repeat NPPF with regard to plan review period. Agent of change wording is already included in the explanatory text 14.55 and the Plan should be read as a whole. In response to Peel Land & Property Management Ltd, Policy 62 and the Policies Map identifies mineral sites, preferred areas, areas of search and safeguarding areas across the borough. The mineral safeguarding area for sand and gravel to the east of the borough has to be retained and expanded, not removed. Paragraph 14.55 states that mineral safeguarding areas are identified under developed/sterilised areas to allow for prior extraction consideration should this be appropriate as part of a redevelopment/regeneration scheme. In response to the CPRE, the minerals policies and supporting text conforms to the NPPF and NPPG which identifies the short term need for hydrocarbons to contribute towards a long term low carbon economy.

Supporting Representations from:
The Coal Authority (01223)
North Yorkshire County Council (05170)
Edlington Town Council (0757)
Marshalls Plc (0865)
FCC Environment (05273)
North Lincs Property (05279)

Objecting Representations from:
East Riding of Yorkshire Council (0009)
Historic England (0016)
Campaign to Protect Rural England South Yorkshire (0077)
Sibelco UK Ltd (03133)
Peel Land and Property Management Ltd (04288)
Mineral Products Association (04371)

Policy 63: Minerals Development Proposals, Borrow Pits & Incidental Extraction

3.209 There were 4 Representations to this policy received. The Coal Authority and North Yorkshire County Council both support the policy. Sheffield Area Geology Trust object that previous suggested wording has not been included. The Minerals Products Association sets out a number of amendments to the policy wording.

Council response: Support welcomed. Sheffield Area Geology Trust’s objection/suggested wording is considered to already be covered by Policy 31 Part A6. In response to the Mineral Products Association, applications will be addressed on their merits in line with Policy 63 and relevant policies in the Local Plan.

Proposed Changes: None

Supporting Representations from:
The Coal Authority (01223)
North Yorkshire County Council (05170)

Objecting Representations from:
Sheffield Area Geology Trust (01747)
Mineral Products Association (04371)

Policy 64: Reclamation of Mineral Sites

3.210 There were 6 Representations to this policy. The Coal Authority and North Yorkshire County Council support the policy as sound, and Sheffield Area Geology Trust note that previous suggestions to the policy have been taken into account. INEOS Upstream Limited, United Kingdom Onshore Oil and Gas and IGas Energy PLC make similar comments and state that onshore oil and gas sites are temporary, and the land is restored to its former or an agreed improved use once the wells have been decommissioned. Once a site is restored an operator cannot relinquish its environmental permits until the EA are satisfied that there are no-longer any risks to the environment. This can take up to 5 years. An operator will agree restoration and aftercare conditions with the planning authority in line with the requirements of the EA and HSE (well decommissioning) where relevant.
Council response: Support welcomed and comments are noted. Policy 64 pertains to all mineral sites not just hydrocarbons. The Planning Authority will work with other regulatory bodies when and where appropriate.

Proposed Changes: None

Supporting Representations from:
The Coal Authority (01223)
North Yorkshire County Council (05170)
Sheffield Area Geology Trust (01747)

Other Representations from:
INEOS Upstream Limited (05058)
United Kingdom Onshore Oil and Gas (05014)
IGas Energy PLC (05129)

Policy 65: Providing for Energy Minerals (on-shore Gas & Oil (Hydrocarbons))

3.211 There were 8 Representations to this policy. The Coal Authority supports the policy. The Environment Agency note that the policy has been significantly altered since the last consultation and cannot see reference to comments made previously although note reference to working with all relevant key regulators which would includes the EA. North Yorkshire County Council also support the policy in principle but note it has been changed since the 2018 consultation. The CPRE object stating that the policy is not sound because it is not justified and does not take properly into account local development constraints. They also state that it is ineffective without constraint related criteria, there is risk development will be inconsistent with proper protection of rural areas in the borough. Oil and gas have different impact to other minerals and need to be separately addressed in specific policies, if development is to be controlled and mitigated properly. They propose revisions to the policy. INEOS Upstream Ltd state that the Local Plan should address the full range of onshore hydrocarbon extraction including: conventional onshore oil and gas development; extraction of petroleum or hydrocarbon oils and gases by drilling and pumping; capture of methane that has accumulated in mines; and, coal bed methane and gas derived from shale reservoirs. Whilst INEOS supports the positive approach to hydrocarbons of the draft Local Plan they believe that changes should be made. Having regard to practice elsewhere, they believe that there should be a single policy dealing with hydrocarbons. This should be simple and positively worded and recognise that the policy is supported by other policies in the Local Plan, which provide the details for necessary assessment of impacts. Revised wording provided. Cuadrilla Resources Ltd are pleased at inclusion of a policies map identifying granted PEDLs and permitted hydrocarbon sites. Beneficial to expand the explanation text in 14.73 to cover the role of the other regulators. Benefit in expanding the policy text to include the 3 distinct phases of hydrocarbon development (Exploration, Appraisal,
and Production) to ensure consistency with NPPF Paragraph 209 (b). Want other policies in the Local Plan applied proportionally. Amend Policy 65 to replace the word 'determined' with 'supported'. IGas Energy PLC state that there are hydrocarbon energy minerals other than gas and oil, such as coal. No mineral policies for coal but their presence is referred to in supporting text. This should be addressed.

Pleased to see inclusion of PEDLs, but second part of the Policy requires applications for the exploration, appraisal and development (including production) of on-shore gas and oil in licenced areas to be determined in line with National Policy, Guidance and relevant policies within the Local Plan. Policy 65 is not positively prepared, does not distinguish between and plan positively for three phases of development (exploration, appraisal and production) and does not refer to all hydrocarbons. If policy retained in current form the term 'determined' should be replaced with 'supported'. The Plan does not support the principle of hydrocarbon development, identify the different stages of hydrocarbon exploration, appraisal and production or include criterion against which proposals will be assessed. It does not reflect EIA regulations and does not reflect roles of regulators. Proposals for hydrocarbon exploration and appraisal do not fall into schedule 1 of the regulations. Production may fall in to schedule 1 subject to thresholds being met or exceeded. EIA requirement determined by a screening scoping request. (Industry is committed to undertake site specific EIAs). Evidence base states policies will be developed in the local plan that comply with national policy guidance and legislation, but previous policy commitment has changed. United Kingdom Onshore Oil and Gas make similar comments.

**Council response:** Support welcomed. In response to requests for changes to the policy and supporting text and the reasons why the policy has significantly changed since the 2018 version, there is no political support for unconventional hydrocarbon extraction and as such applications will be determined in line with national policy and guidance. In response to comments made by the industry, the Local Plan is not required to repeat national policy or guidance. NPPG paragraphs 091 to 131 comprehensively covers the requirements for shale gas and hydrocarbons and should not be repeated in the Local Plan. Paragraph 106 identifies what the Local Plans should include. A policy is provided (as required), which defers directly to national policy and guidance, which is positive in nature. Petroleum Licence Areas on their policies maps and criteria-based policies requirements have been fulfilled. The local plan should be read as a whole and contains criteria based policies against which applications can be determined. As an example, policies in the chapters on green infrastructure, historic environment and health and wellbeing will be used to determine applications. As will national policy and guidance. The relevant criteria based policies can be used at different stages of an application process. In response to Cuadrilla Resources Ltd, the Local Plan is not required to repeat national policy and guidance. Regulators are identified in NPPG. The Local Plan is a planning tool to be applied fairly and proportionally by Development Management officers.
Proposed Changes: None

Representations from:
Environment Agency (0014)
Campaign to Protect Rural England South Yorkshire (0077)
The Coal Authority (01223)
United Kingdom Onshore Oil and Gas (05014)
INEOS Upstream Ltd (05058)
Cuadrilla Resources Ltd (05124)
IGas Energy plc (05129)
North Yorkshire County Council (05170)

Chapter 15: Implementation & Monitoring

Policy 66: Developer Contributions

3.212 There were 19 Representations to the policy; all from the development industry with the exception of one from Highways England whom raised that the policy should allow for pooled contributions resulting from the cumulative impact of multiple developments. The industry is supportive of the need for developer contributions. The NPPF is, however, clear that the derivation of developer contributions must not only take account of need but also viability. Appendices 3-10 of the Viability Report show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support provision of 15% affordable housing. In some circumstances some site typologies in the medium value areas would also be unviable. The whole plan viability report concluded that generally schemes in high and medium value areas were demonstrated to be viable. However, it should be noted that this did not consider the cumulative/in combination impact of all of the policy requirements and assessed other Plan requirements against the delivery of 15% affordable housing and not 23% affordable housing as sought by Policy 8. Concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. Persimmon Homes Yorkshire Ltd state that Part C requires clarification to ensure that where the Council is considering an application for part of a site, that part of the site will not face planning obligations over and above what is necessary, proportionate and reasonably related in scale and in kind to that part of the site. Mr R.J. Ogley, Mineral Investments Ltd & Higgins Agriculture Ltd & Bellway Homes, and, Mr Ian Murray object to the wording. Specific developer contributions should be defined
either in policy, an SPD document or a CIL document for clarity and to ensure deliverability and soundness. It is inadequately clear and ineffective, and thus unsound.

**Council response:** A Main Modification is proposed to include a mechanism for pooled contributions following the lifting of the limits on such from the changes to the CIL Regulations in 2019 to address Highways England’s comment. The viability testing considers a number of different viability scenarios. This includes the ‘base’ appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific ‘low-cost? developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in. Part A of the policy makes clear that any contributions must be fair and reasonable in scale and kind. Further details of contributions are set out in other Local Plan policies, for example Policy 29 sets out the detail of open space in new developments. Should the Council look to introduce CIL in the future then this process itself will have to make clear what is covered by CIL and what will still be negotiated via S106 as set out in the explanatory text to the policy at para 15.4.

**Proposed Changes:** Yes – additional policy wording to allow for pooling of contributions to reflect Highways England comments now that the CIL Regulations have been amended – see Schedule of Suggested Changes (Doc Ref: CSD5)

**Representations from:**
- Highways England (03631)
- Persimmon Homes Yorkshire Ltd (03431; 05289 & 05290)
- Strata Homes Yorkshire Ltd (02073)
- Mr R.J. Ogley (03008)
- Minerals Investments Ltd (03116)
- Higgins Agriculture Ltd & Bellway Homes (03467)
- Mr Ian Murray (05309)
- Mr Paul Burtwistle (03506 & 03507)
- Framecourt Homes (05176)
- Avant Homes Ltd (05208; 05209; 05210 & 05211)
- Priority Space Ltd (05213)
- Firsure (05215)
- Metroland (05216)
Policy 67: Development Viability

3.213 There were 20 Representations to the policy; all from the development industry. Objections to the policy are made in that it is not considered to be sound as it is not consistent with national policy. Significant concerns around the implementation of this policy and how frequently it will be used. The use of trigger points could add further burdens to any developer who will need to reproduce viability assessments at a potentially regular basis, going against Government initiatives which are looking to reduce the need for viability assessments. The policy causes unnecessary uncertainty and additional risk for developers, and that such a disincentive of developers could become an impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long time periods. Some Representations make continued objections to the viability of the local plan policies, especially the affordable housing requirement.

Council response: In line with the revisions to national policy and guidance, the Council's view is that the need for appraisals at application stage should be exceptional rather than the norm with an up-to-date local plan and policies tested for whole plan viability upfront. However, where genuine circumstances warrant an appraisal as part of an application then it is considered only best practice to allow for a future review, especially for very large developments that may build out over several years during which market conditions may change. It is also considered that this policy could apply to circumstances where economic conditions change for the worse, as was the case post 2008 when a number of applications started to be re-submitted accompanied with a viability appraisal and seeking reduced/deferred/future consideration of planning obligations in the interests of development viability and delivery.

Proposed Changes: None

Objecting Representations from:
The Home Builders Federation (0129)
Persimmon Homes Yorkshire Ltd (03431; 05289 & 05290)
Strata Homes Yorkshire Ltd (02073)
Mr Turnbull (03259)
Mr Paul Burtwistle (03506 & 03507)
The Strategic Land Group (04444)
Mr And Mrs S Hall (04960)
Framecourt Homes (05176)
R Crowe, G Platts, J Lodge, S Hanson, MA & JM Youdan (05187)
Avant Homes Ltd (05208; 05209; 05210 & 05211)
Priority Space Ltd (05213)
Firsure (05215)
Metroland (05216)
KCS Developments Ltd (05319)


Chapter 16: Spatial Proposals

Doncaster Main Urban Area –

Supported Housing Allocation – Site Ref:033 – Sheffield Road, Warmsworth

3.214 John Burley Investments Ltd supports the allocation of the site and provides a number of comments in support of delivery relating to the developer requirements (Appendix 2).

**Council response:** Support welcomed.

Proposed Changes: None

Supporting Representations from:
John Burley Investments LTD (05298)

Supported Housing Allocation – Site Ref:115 – Alverley Lane, Balby

3.215 Metroland supports the allocation of site, although has concerns in respect to the justification for some of the policy requirements which may impact on deliverability e.g. high-medium value area for affordable housing when previously was in a low value area. A detailed advocacy report is included in the Representation.

**Council response:** Support welcomed. See responses to Policies relating to developer requirements/policy asks etc in respect to contributions, requirements and viability/deliverability.

Proposed Changes: None

Supporting Representations from:
Metroland (05216)

Supported Housing Allocation – Site Ref:164/430 – Land East Warning Tongue Lane, Cantley

3.216 Mr Turnbull & Persimmon Homes Yorkshire Ltd supports the proposed allocation. The site is available, suitable and achievable for development. It is under the control of Persimmon Homes and situated in a popular market area. The Site is demonstrably suitable for residential development. There are no technical constraints which would prevent development of the site which cannot be satisfactorily mitigated. The Site is located entirely in Flood Zone 1 and the vast majority of the site is identified as being at very low risk of flooding from surface water. There are no known infrastructure capacity issues which would preclude the development of the site and which cannot be satisfactorily addressed. The Site is located in a sustainable location directly adjacent to existing residential areas and
located close to a wide-range of local services and amenities. As a site which is available, suitable and achievable, the site therefore meets the test in the NPPF to be considered a deliverable site which can be brought forward for development in the short-term. In order to provide a sufficient buffer of sites and reflect the comments regarding the scale of housing need above, the Council will need to identify additional sites which are available, suitable and achievable for residential development. Mr John Seale objects to the allocation. Building in this location will place residents in harm's way. Combination of site topography and proximity of M18 Motorway will result in a build-up of Nitrous Oxide and the increased traffic as a result of site development will cause safety issues.

**Council response:** Support welcomed. See response to other policies in respect to scale of the allocation/buffer/flexibility etc. In respect to the objection, the site selection methodology has considered a range of criteria and these matters will be considered in more detail through any subsequent planning application.

Proposed Changes: None

Supporting Representations from:
Mr Turnbull (03453)
Persimmon Homes Yorkshire Ltd (05290)

Objecting Representations from:
Mr John Seale (05043)

**Supported Housing Allocation – Site Ref:350/407 – Rose Hill, Cantley**

3.217 Harron Homes supports the allocation of the site which will contribute towards the plan period allocation. Mr Christopher Owen objects to the allocation. The SA should have identified significant negative effects for the site in respect to biodiversity as the site should be considered as a dense urban-regenerating woodland and a Local Wildlife Site, and part of the Local Nature Reserve and SSSI. Evidence shows development will have adverse impacts on: residential amenity; unacceptable high density/over development; detrimental visual impact on character of the neighbourhood; highway safety concerns; lack of drainage infrastructure; environmental impacts and loss of biodiversity. The allocation is not consistent with national policy and is not sustainable. The Site should be designated as an Open Space, part of a Green Infrastructure corridor and/or included within the directly adjacent LNR/SSSI.

**Council response:** Support welcomed. In response to Mr Christopher Owen, the site has been assessed through the full site selection methodology which has been applied consistently. The site has been allocated for housing since its designation as such in the UDP (1998). A planning application would need to comply with all relevant policies in the local plan as well as meet the developer requirements identified in Appendix 2.
Proposed Changes: None

Supporting Representations from:
Harron Homes (05308)

Objecting Representations from:
Mr Christopher Owen (05059)

Supported Housing Allocation – Site Ref:432 – Former Wheatley Hills Middle School, Leger Way

3.218 Avant Homes conclude that the local plan is 'unsound' as the policy is not justified. An application for residential development is currently under consideration and pending decision. The site is proposed to be allocated with an indicative capacity for 134 dwellings. The delivery of this site will make the efficient use of previously developed land which is located within the Doncaster Main Urban Area and will make a notable contribution to housing supply in the Borough thereby supporting the spatial strategy for the plan period. The allocation of this site for residential development and this principle is supported, however, we object to the suggestion that the site can deliver 134 dwellings over the plan period and request that the indicative figure is increased to 143 units.

Council response: The difference between the allocation capacity (137 units) and the pending planning application (143 units - 19/01170/FULM) is just 6 dwellings. The planning application was submitted in May 2019 after the Local Plan had commenced through the DMBC internal approvals process for decision to publish under Regulation 19. Policy 6 makes clear that capacities are indicative and that higher density schemes will be supported, for example where they lead to a more appropriate design solution.

Proposed Changes: None

Objecting Representations from:
Avant Homes (05259)

Supported Housing Allocation – Site Ref:838 – Bombardier, Hexthorpe

3.219 Countryside Plc supports the allocation of site, although the table of allocations with Planning Permission suggests the site will deliver 930 units over the plan period. This is now incorrect. The current planning application proposes a maximum of 671 units. Suggest the table be amended to show 671 units. Support Western part of site remaining as Green Belt on the Policies Map. Miller Homes, Strata Homes Yorkshire Ltd and Avant Homes both object to the assumptions around the site’s contribution to housing supply as the permission has no completions on site and is not currently being developed.
Council response: Support welcomed. Agree the latest evidence from the fresh planning application is seeking a lower capacity (671 units) than the extant permission (930 units) given the former no longer proposes the significant element of flats/apartments so the plan/policy needs amending to this lower yield. The site is deliverable/developable and the Representation confirms that the site will deliver 671 dwellings over the plan period.

Proposed Changes: Yes – amendment to reflect change in understanding of capacity as per the Representation and the latest planning application which reduces the site capacity to 671 units due to not including the element of apartments which the previous scheme identified.

Supporting Representations from:
Countryside Plc (05306)

Objecting Representations from:
Strata Homes Yorkshire Ltd (02073)
Avant Homes Ltd (05208 & 05209)
Miller Homes (05288)

Rejected Housing Allocation – Site Ref:116 – Armthorpe Lane

3.220 Persimmon Homes Yorkshire Ltd object to the local plan not allocating the site. It represents a sustainable, deliverable site which accords with the strategic aspirations of the plan. A Site Delivery Document was previously submitted to the Council and has been re-submitted as part of these representations for consideration. This site is in the control of Persimmon Homes, is suitable for development with no insurmountable technical constraints present. A section of the site is covered by Flood Zone 3. Being located on the east side of the settlement of Kirk Sandall within the Doncaster Urban Area, the area of the Borough identified as being the most sustainable location for growth and the location that is intended to accommodate the highest number of houses in the plan period. It is well served by the shops and services (including schools, medical surgeries and bus and rail links) within Kirk Sandall itself. This site is identified in the HELAA and has been assessed against the Council's selection methodology but was rejected on the basis that the site fails to meet the flood risk sequential test. However, this assessment was a high level assessment which automatically ruled the site out because part of the site was located in Flood Zone 3. The assessment failed to consider if the sequential test could be met within the site and still provide a deliverable site which could meet all other policy objectives. By applying a blunt assessment methodology, the site has been discounted without further consideration of the wider sustainability credentials of the site. The sequential test can be met within the site as development would take place within the 75% of the site which falls within flood zone 1. It is also worth noting that almost all of the other sites that have been rejected on this basis have a much larger proportion of their area in Flood Zone 3 or have other technical or policy constraints affecting their suitability (such as Green Belt). Armthorpe Lane has no
such issues. The site is defined within the Local Plan policies map as being countryside due to it being beyond the defined development limit. It is in Persimmon Home’s opinion illogical for the boundary of the settlement to be drawn in this location. It is considered that Armthorpe Lane (forming the eastern boundary of the site) forms a more logical and permanent fixed boundary that will safeguard the countryside from encroachment. Matters of flood risk aside, there are no technical issues that prevent the site’s allocation.

**Council response:** The site has been assessed through the full site selection methodology and process consistently. The site was rejected in 2018 due to failing the flood risk sequential test. Following receipt of the site promoter’s masterplan showing the parts of the site that are flood zone 3 are being avoided in 2018, the site was identified as passing the sequential test through the updated report issued alongside Publication. Disagree therefore that the Council has not taken such Representation into account. The report is clear that the reason the site is still not being “the site promoter has addressed previous issues in respect to flood risk and sequential test through submitting a masterplan that avoids any built development in the part of the site that is at risk of flooding. There are however very large overhead pylons that cross the site north to south. The masterplan avoids development beneath them with buffering/open space/landscaping. These constraints significantly reduce the potential capacity of the site from the estimated average of 646 dwellings. The Council still has concerns in respect to ac-accessibility issues with taking access from Brecks Lane. No foot-ways presently and Brecks plantation will constrain provision in the form of offsite highway works. Therefore does not necessarily conform with NPPF 108/110. Unable to determine whether visibility requirements for new accesses would meet requirements in accordance with 85th percentile wet weather speeds.”

Proposed Changes: None

Objecting Representations from:
Persimmon Homes Yorkshire Ltd (05289)

**Rejected Housing Allocations – Site Refs:212, 213, 214, & 215 – Common Lane/Mill Lane/West Farm, Warmsworth**

3.221 Warde-Aldham Estates object to the local plan not allocating any of these sites. In respect to Site Refs: 212/213/214, there are no known technical or physical restrictions to bringing the site forward for residential development. The only constraint to bringing these sites forward for development in the short term is that the sites are currently designated as Green Belt. Notwithstanding this, the sites are considered to be a well contained within the Main Urban Area to accommodate future housing development to meet the objectively assessment housing need for the Borough over the next 17 years. It considered that, due to their location and the way that the Main Urban Area is defined as the contiguous built-up area of Doncaster comprising a number of distinct but connected districts, the sites does not
conform with the five purposes of the Green Belt. In respect to West Farm (Site Ref: 215) the site should either 1) remain as existing (as currently set out in the UDP) in that the eastern part of the land remains within the Residential Policy Area, with the western parcel providing the open space for the area, or 2) is wholly allocated for residential development. Providing the right type of housing in the right places is essential to ensure that sustainable communities continue to thrive. We support, in principle, the need for all new housing developments to provide an appropriate mix of dwelling types and sizes, taking account of existing imbalances in the housing stock, site characteristics, viability and market considerations, and, the opportunity to facilitate self-build or custom build schemes. However, each site needs to be considered on a site by site basis, based on its individual merits. The Council cannot place too much reliance on existing commitments as the effect of non-delivery of some developments will have a significant effect on the housing land supply position. We therefore considered that the proposed housing allocations are reassessed and that our client’s land is considered favourably as future residential development to meet the housing needs of the Borough in the Main Urban Area. Finally, to protect the future development opportunities post plan period, it is considered that an alternative option is to safeguard land to ensure that the revisions to the Green Belt boundary are long lasting and do not require further amendments post plan period (e.g. future-proof the revised boundaries - identifying land for development beyond the Plan period). Para 139 of the NPPF states that when defining Green Belt boundaries, plans should "where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period". We therefore support the proposal to safeguard land at Warmsworth for future development in accordance with the NPPF.

**Council response:** The Site Selection Methodology, Green Belt Review and Topic Paper, and Local Green Space Methodology and Sites report all cover reasons why these sites have not been allocated for housing. Site Refs: 212, 213 and 214 are all Green Belt. In addition, Site Ref: 212 is within Flood Zone 2/3 and therefore inappropriate to allocate in line with the flood risk sequential test. Site Ref: 215 is a proposed Local Green Space allocation, as discussed in more detail in the Local Green Space Methodology and Sites document.

**Proposed Changes:** None

**Objecting Representations from:**

Warde-Aldham Estates (04706; 04707; 04708; & 04709)
Rejected Housing Allocation – Site Ref:234 – Broadaxe, Scawthorpe

3.222 Strata Homes objects to the site not being allocated when the local plan is not identifying sufficient allocations for the plan period coupled with delivery issues with some sites. Broad Axe is available, suitable and achievable and is therefore in accordance with the Framework a deliverable site able to come forward in the short term. The land is being promoted by Strata Homes Ltd who control the land and the site is a highly sustainable site, well connected to the main urban area and one which the Council itself has considered to be one of the most sustainable housing sites adjoining the main urban area. Development of the site would neither detract from the purposes nor function of the Green Belt in this location. The Councils own site assessment summary notes that in relation to Green Belt it performs the same as other allocated sites. Technical work undertaken to date in respect of highways, ecology, flood risk and drainage, heritage and agricultural land has influenced the indicative masterplan. It has also shown that there are no known constraints, that could not be suitably mitigated, that would prevent this site coming forward within the plan period. As such, the development of the site, as shown within the indicative masterplan, is considered achievable. The Council previously identified the site as a proposed housing allocation and concluded that the site is required to meet the housing needs of Doncaster and is a sustainable site to meet the housing growth of the area. This reflects the Councils earlier conclusions that the site is a sustainable and appropriate site to meet the housing needs of the Borough. The Council have now indicated that the site is no longer required as there have been two significant permissions in the settlement which have reduced the need to rely on urban extensions in order to meet the authority’s housing needs. Mr Paul Whiting supports that the local plan is no longer proposing to allocate the site. The site is Green Belt and there are no exceptional circumstances; adjacent to a scheduled monument and therefore allocated rights to preserve its setting; good quality agricultural land, and; acknowledged in the Green Belt review as avoiding merging the adjacent communities, being a ‘green wedge’.

**Council response:** The site is Green Belt and scored moderately in the Green Belt Review, however the need to use Green Belt land at the Main Urban Area has been tempered by permissions granted at Hungerhill and Mere Lane since the 2018 consultation, as the Representation eludes to, elsewhere in the Main Urban Area for a combined total of over 1,100 houses. The Site Selection Methodology and Green Belt Review/Topic Paper sets out more details on why the site has not been proposed in the Publication version.

Proposed Changes: None

Representations from:
Strata Homes Yorkshire Ltd (02073)
Mr Paul Whiting (03160)
Rejected Housing Allocation – Site Ref:436 – Scawsby Lane, Scawthorpe

3.223 Theakston Estates Ltd object to not allocating their site and removal from the Green Belt as it forms a logical and sustainable extension that can help meet the main urban area housing needs. Land to west by Scawsby Lane is also in the same ownership and proposed as a country park alongside residential development for 800 homes. The HELAA notes the site is deliverable and developable within 6-10 years overall. The client is confident delivery could be secured in years 1-5. The client has sought to understand concerns about the site and acted accordingly An indicative masterplan shows 800 new homes, a new school and other community shops and facilities, as well as a community park land to the west of Scawsby Lane. This would help address deficiencies in open space highlighted in the Settlement Background Paper. The parkland would include sports facilities, woodland play, allotments and wildlife habitats. This is a significant benefit which aligns with NPPF para. 138, the Settlement Background Paper and Local Plan Objective 13. Playing fields could also deliver additional education benefit by providing provision or car parking to support the existing schools on Barnsley Road. The masterplan details how this can all be achieved.

Council response: Large urban extension site extending to 39.1 hectares to the west of Scawsby. The Sustainability Appraisal has identified significant negative effects and the site promoter has set out how these could be overcome through layout and it is noted that this is a very large site where there would be scope for sensitive site lay-out and design of a scheme that could avoid areas of archaeological significance whilst still delivering an extension with significant capacity. In conclusion, although the site has been identified as performing the same through the Green Belt Review Phase 3 as another site at the settlement which is being proposed for allocation, the site does not perform as well through the Sustainability Appraisal and sufficient allocations are now identified.

Proposed Changes: None

Objecting Representations from:
Theakston Estates Ltd (01937)

Rejected Mixed Use Allocation – Site Ref:438 – Doncaster Waterfront

3.224 Mr Paul Whiting objects that the site has not been identified as an allocation. The omission is a simplification and misinterpretation of the Sequential Flood Risk Test. The site is vital for the strategic vision of the town centre's regeneration. It is rundown and neglected and leaving it as such whilst the Green Belt is developed is wrong. Appropriately designed housing could be directed here under the Exception Test. The Environment Agency saw no unmanageable risk in the development of this site with appropriate design. It should be possible to show wider sustainable benefits outweigh flood risk.
Council response: All of the site is within Flood Risk Zone 3 so allocation of the site would lead to inappropriate development in a high flood risk area – the site fails the flood risk sequential test therefore. Further to this, there are currently a number of proposals for the site which may not necessarily include any residential element so demonstration of delivery at present would be difficult. Policy 69 provides sufficient policy to guide any future application(s) and should there be any residential element (including successful pass of flood risk sequential and exception tests) then this would be a windfall/additional source of supply.

Proposed Changes: None

Objecting Representations from:
Mr Paul Whiting (03160)

Rejected Housing Allocation – Site Ref:494 – Green Lane, Scawthorpe –

3.225 Avant Homes Ltd object that the site is not allocated when the site performs the same as others but is not needed as "sufficient allocations are now identified". There is an under provision of housing in Doncaster which should have 50% of new homes. There is currently an under supply and the yields have been significantly over estimated. The needs cannot be met in other settlements. The site is located close to employment opportunities along the A1(M). It is therefore sustainable and an appropriate location for housing growth. New housing should be located on the western side of Doncaster to ensure Doncaster maximises the economic growth potential of these major inward investors. The site can deliver housing in the short term, and a robust Green Belt boundary can be created utilising Green Lane and Roman Ridge. To the south is the proposed allocation Site Ref: 234. The site can be accessed through Green Lane and the adjacent Site Ref:234. The site is available, suitable and achievable and therefore in accordance with the framework. Technical studies are ongoing but initial assessments demonstrate the sites deliverability.

Council response: The Main Urban Area will provide more than 50% of the total allocated 15-year supply in the borough. Densities and build out rates were agreed with stakeholders early in the process. The Housing Topic Paper explores this further. The Site Selection Methodology report sets out reasons for why sites have been supported/rejected with further details on supply and distribution set out in the Housing Topic Paper. Although the site has been identified as performing the same through the Green Belt Review Phase 3 as another site at the settlement which is being proposed for allocation, the site does not perform as strongly through the Sustainability Appraisal.

Proposed Changes: None

Objecting Representations from:
Avant Homes Ltd (05208)
Rejected Housing Allocation – Site Ref: 1016 – Melton Road, Newton

3.226 Avant Homes Ltd object to the local plan not allocating the site. There is an under provision of housing in Doncaster which should have 50% of new homes. There is currently an under supply and the yields have been significantly over estimated. The needs cannot be met in other settlements. Technical studies are ongoing but initial assessments demonstrate deliverability. The site is available, suitable and achievable and able to come forward in the short term. Advocacy document provided.

**Council response:** The site is a large Green Belt site which scores moderately weakly in the Green Belt Review and is also adjacent to Cusworth Hall. It’s inclusion would impact the Green Belt and the setting of Cusworth Hall, and it is not deemed that there are exceptional circumstances to release this site from the Green Belt, nor is the site required to help meet the housing requirement for the Main Urban Area.

Proposed Changes: None

Objecting Representations from:
Avant Homes Ltd (05209)

**Policy 68: Doncaster Town Centre**

3.227 There was a single Representation of support from Historic England to the policy.

**Council response:** Support welcomed.

Proposed Changes: None

Supporting Representations from:
Historic England (0016)

**Policy 69: Key Doncaster Town Centre & Main Urban Area Mixed-Use Sites**

3.228 There were 2 Representations to the policy. Historic England support the policy as being ‘sound’. The Canal & River Trust also support the policy. However, it is noted that the text refers to the formation of a new footbridge over the river Don. Without full details of the location of this bridge, or its design, it is not possible for the Canal & River Trust to confirm whether its installation would impact negatively upon the operation of the river as a navigable waterway. As a result, there is a significant risk that the policy, as worded to include the provision of the bridge, might not be able to be delivered.

**Council response:** Support welcomed. The Canal & River Trust’s concerns are proposed to be addressed through a Suggested Change to the plan.
Proposed Change: Yes – amendment to policy to reflect Representation from Canal & River Trust (see Doc Ref CDS5).

Supporting Representations from:
Historic England (0016)

Objecting Representations from:
Canal & Rivers Trust (03089)

**Main Towns**

**Adwick-le-Street-Woodlands**

**Rejected Housing Allocations – Site Refs: 512 & 513 – Redhouse Lane (b & c), North East Adwick**

3.229 Hallam Land Management object to not including their sites as allocations when it has been identified that the plan is failing to provide sufficient housing to meet a job led requirement for the whole Local Plan period. Site 512 and 513 could provide 130 and 650 dwellings respectively. Scores strongly compared to sites 165/186 (Carcroft - Skellow); 033 (MUA) and 929 (Sprotbrough). The principal reason this site has not been selected is because the range is lower and non Green Belt allocations/permissions get within it. However, a significant increase in housing is necessary and the distribution should be different - reflecting settlement sustainability credentials - and therefore the position may be altered and this site is well placed to contribute positively to increased housing provision in the plan period.

**Council response:** As the Green Belt Topic Paper explains, the Green Belt Review is part of the consideration for exceptional circumstances for removing sites from the Green Belt. It is not a case of picking the "next best" site in the overall scores, there are other considerations. Adwick-Woodlands is the smallest of the Main Towns and has a lower housing target, but can comfortably get in its range without utilising Green Belt.

Proposed Changes: None

Objecting Representations from:
Hallam Land Management (05283)

**Armthorpe**

**Rejected Housing Allocation – Site Ref:239 – Grange Farm, Mere Lane, Edenthorpe**
3.230 Miller Homes object to their site not being allocated. Grange Farm is deliverable and developable in accordance with the definitions in the NPPF. A vision framework document has been drawn up. The revised site layout on the 2015 scheme now takes account of the green wedge concerns raised in the 2012 application. The site adjoins the urban area and is a sustainable urban extension. It now would not merge Armthorpe and Edenthorpe. It can contribute to delivering sustainable growth. The site will make a positive contribution towards the management and enhancement of the landscape. There will be a clear and defensible Armthorpe/Edenthorpe boundary created. The majority of existing trees have been retained and new native trees and shrubs will be planted. The site provides a central area of open space and new buffer planting areas to take into account local views. The layout can also incorporate a wildlife corridor between Shaw Wood and Long Sandall. There are no fundamental ground issues. The majority of the site is not at risk of flooding, no development is proposed in flood zone 3, so it is sequentially preferable. Safe access can be made to the existing transport network and all issues previously flagged regarding specific design can be resolved through detailed working of the scheme. The site is well located close to the A18/A630 improvements which will only alleviate earlier concerns. It is well serviced by public transport with the nearest bus stop 150 metres away and has a high frequency service to Doncaster centre. The site is well served by shops in Edenthorpe and Armthorpe. It has good walking and cycling links which can be improved. There are no technical constraints and outstanding matters of the current application are all details which can be overcome. The site has one owner who is willing to develop the land and has an agreement drawn up with a house builder - Miller Homes - a national house builder with experience in delivering residential projects and producing places people want to live in.

**Council response:** Comments and supporting site deliverability information are noted. However, the site is located within the parish of Armthorpe and is therefore within the designated boundary of the Armthorpe Neighbourhood Plan. Alternative sites in the Neighbourhood Plan area have been identified by the Neighbourhood Plan that are more than sufficient to meet the settlement’s Local Plan plan period target – see site selection methodology report and Armthorpe Neighbourhood Plan for more details. The Representation maintains the site should be considered as an extension to the Doncaster Main Urban Area, however as set out above it is entirely within the designated Neighbourhood Plan Boundary.

Proposed Changes: None

Objecting Representations from:
Miller Homes (05288)

**Conisbrough-Denaby Main**

**Supported Housing Allocation – Site Ref:040 – Sheffield Road/ Old Road, Conisbrough**
3.231 Mr R.J. Ogley supports the allocation in principle and it is considered that the delivery of the site is essential to helping deliver the boroughs spatial strategy. Objects to the proposed capacity and the delivery timescale. The site could accommodate 234 units (80% of the site developed at 35dpa), and there is a willingness to deliver this site as soon as possible (150 dwellings in first 5 years) with interested developers who have submitted Expressions of Interests and no site constraints.

Council response: Support noted. The site density has been based on a standard calculation through HELAA, however Policy 6 stipulates that lower or higher densities will be supported if this can assist in the delivery of a better design solution.

Proposed Changes: None

Representations from:
Mr R.J. Ogley (03008)

Rejected Housing Allocation – Site Ref: 825 – Drake Head Lane, Conisbrough

3.232 MerryVale Developments object to the site not being allocated. The Green Belt is tightly drawn in Conisbrough and this limits growth. Support the identification of Conisbrough as a Main Town to deliver sensible and sustainable housing for the borough. This is crucial in ensuring local needs are met locally. Broadly support housing numbers and the range for Conisbrough contains a significant margin of difference. It is important flexibility is built in which does not stifle growth potential. The higher range figure should not be a maximum figure. Should housing needs change over the plan period, it is crucial for the plans sustainability that is flexible enough to provide further development if the need arises. This should be made explicit. Disappointed that the land has not been removed from the Green Belt and allocated. The site presents the opportunity to provide additional housing and round off the settlement without detriment to the wider area and without encroachment towards other settlements, as the site does not extend beyond Conisbrough.

Council response: General support for approach to housing at Conisbrough-Denaby is noted. The Site Selection Methodology and Green Belt Topic Paper elaborated on why this site has not been preferred for housing here, and why other sites are preferable.

Proposed Changes: None

Representations from:
MerryVale Developments (04331)

Rejected Housing Allocation – Site Ref: 1000 - Stringers Nurseries, Crookhill Road, Conisbrough
3.233 Request that the site is removed from the Green Belt and allocated for housing. Disagrees with the conclusions of the Green Belt Review. The allocated sites in Conisbrough total 528 units (+ 325 on a reserve site) so 853 in total and therefore short of the target of 975 homes. The site is deliverable in the short term and can contribute to the identified shortfall in the area. The site can deliver 50 - 60 houses with access from Crookhill Close, with appropriate improvements and segregation of existing garden centre parking/ delivery areas. There can be a separate access to the housing development. New housing would reflect the existing housing to the west and a logical expansion of the existing adjacent housing. A new landscaped boundary could provide a strengthened Green Belt boundary in the area. Separately, it is also to be requested that the garden centre is removed from the Green Belt as it is insensitive development and non-conforming with Green Belt use. This would also strengthen the boundary. There can be improved walking/cycling/habitat enhancement. Residential development would be the most appropriate use for this former nursery site. This would tie in with the existing housing to the west and round off the settlement with a new landscaped edge which avoids the threat of coalescence between settlements. Indicative layout provided.

**Council response:** It is unclear what the objection to the Green Belt Review conclusions for this site are. However, as shown in the Green Belt Topic Paper, there are no exceptional circumstances for releasing further land in this location, and despite the reserve development site not actually counting towards housing totals here, Conisbrough-Denaby can get within its housing target range without releasing any further sites such as this. It should also be noted that the Green Belt Review indicates that there may be more preferable sites in Green Belt terms in this settlement.

Proposed Changes: None

Representations from:
Klondyke Group Ltd (04434 & 05186)

**Rejected Housing (Mixed Use) Allocation – Site Ref: 1035 – Hill Top, Denaby**

3.234 Harworth Group Plc object to the site not being allocated for a mixed use site. It is contended that the 4 prospective sites at Conisbrough & Denaby (i.e. excluding site 435) should be assessed equally i.e. without preference being given to greenfield non-Green Belt sites in this location. This fresh assessment would seek to identify those sites which meet the housing need in the most sustainable manner, represent the most suitable employment site(s), protect biodiversity and open space for sports and recreation, and best preserve the overarching function of Green Belt around Conisbrough & Denaby. Within this assessment, consideration should be given to the designation of non-Green Belt land as Green Belt where the requirements of national planning policy are met.
**Council response:** There is no reason to disregard an available non-Green Belt site on the basis that the consultee states that it should be Green Belt. The fact is that it is not, and therefore such non-Green Belt sites should be the first to be considered for allocation. Failing finding enough suitable non-Green Belt sites, Green Belt land was considered, as is the case in Conisbrough. All sites have been assessed in the Sustainability Appraisal and where necessary in the Green Belt Review, which has informed decision making on sites. The evidence to support these is contained in a range of evidence base papers, including the Site Selection Methodology, Housing Topic Paper and Green Belt Review/Green Belt Topic Paper. The detailed background site work is not repeated in the Local Plan for brevity.

Proposed Changes: None

Representations from:
Harworth Group PLC (05203)

**Dunscroft-Dunsville-Hatfield-Stainforth**

**Supported Housing Allocation – Site Ref:170 – Doncaster Road, Hatfield**

3.235 Avant Homes Ltd supports the allocation of the site and provides supporting advocacy document in respect to deliverability. Concerns regarding the justification of developer requirements, such as open space, affordable housing, site capacity, and their impact on deliverability. Suggests a review of requirements and greater clarity and justification for the site requirements.

**Council response:** Support for allocation is welcomed. See responses elsewhere in respect to justification of developer contributions (e.g. Policy 66) and the developer requirements (e.g. Appendix 2).

Proposed Changes: None

Representations from:
Avant Homes Ltd (05211 & 05303)

**Rejected Housing Allocation – Site Ref:1038 – Woodhouse Lane, Hatfield**

3.236 Hallam Land Management object to the site not being allocated. Unity (Site Ref:418) is a complex scheme and has deliverability issues (multiple land ownerships, no Reserved Matters yet submitted, infrastructure requirements, the scheme's permission includes conditions and assessment that identifies that it will take up to 20 years+ to complete, and a 25 year timeframe to submit Reserved Matters and as late as 2042) and there is an over reliance on the scheme to meet the settlements requirement. This is of particular concern given that whilst 3,945 units are identified as having planning permission within the settlement, 3,100 of these are within the Unity development site. Even when considering the discounted supply figure of 1,860 units set out at paragraph 16.83 (making provision for Unity
units delivered after the plan period), 1,015 of these units (around 55% of the total supply in this settlement) are allocated within the Unity development site; the remainder of the sites allocated are to be delivered in the short term. With this in mind and the likelihood of further delay in its delivery during the Plan period, the Council should allocate additional housing sites within the settlement to ensure that sufficient levels of delivery are achieved in the medium term should the delivery of the Unity site be delayed. The approach is unsound due to a lack of justification for a number of the draft allocations. Sites with significant constraints including being located within Flood Zones 2 and 3 and without agreed mitigation or planning permission have been allocated before other sustainable sites which are not subject to such significant risks - this is contrary to the approach required by the NPPF and is of particular concern given the reasons for withdrawal of the Sites and Policies Development Plan. It is concerning that issues relating to the methodology for site assessment and allocation have not been addressed in Doncaster's new emerging Local Plan. A review of this methodology is required and should include a revision of the draft allocations proposed to ensure allocated sites are consistent with national planning policy. The site is entirely within Flood Zone 1. Whilst it is located within the 'Countryside' for the purposes of Policy 2, it is adjacent to the proposed Hatfield settlement boundary, abuts emerging residential allocation Site Ref: 970 and is well related to the existing built form.

**Council response:** The Council are confident of the delivery of the Unity initiative and infrastructure is underway which will help unlock the sites potential. Even without the Unity site, or allowing for slippage, the settlement would comfortably get within its housing range of 575 - 1,085, as it has a total of 1,720 units from permissions, and a further 108 from allocations (1,828), and a total of 875 are projected to be delivered at Unity. No new allocations are being made in flood zones, however, where permissions exist/are being developed (which will have demonstrated they pass the sequential test), these are reflected in the supply. No further sites are required in this location.

Proposed Changes: None

Representations from:
Hallam Land Management (05212)

**Policy 70: Unity Regeneration Project**

3.237 There were 4 Representations to the policy. Network Rail supports the policy in ensuring that new developments will provide improved rail infrastructure to benefit the new users of the station. FCC Environment support the policy and that their Bootham Lane landholding is allocated within the mixed use development area associated with the Unity regeneration project. FCC Environment supports the wider Unity regeneration project and the mixed-use allocation over their Bootham Lane landholding. It is considered that the site could be integral to the wider Unity project
by providing green infrastructure and leisure uses, and a site for potential low carbon renewable energy sources, once the landfill area has been fully restored. In addition they have aspirations to develop the non-landfilled areas/former operational areas of the site for commercial uses to compliment the proposed development within the Unity project. There is also the opportunity to improve the wider regeneration projects green credentials with a possible solar farm development on the future restored landfill areas. FCC seek to safeguard the continuation of Bootham Lane Landfill operations including the closure period, consisting of restoration, aftercare and gas/leachate management, which should not be compromised by the development of the wider Unity regeneration project. Historic England state that the Grade II Listed Headstocks are the defining feature of this area and their future conservation together with how any future development relates to them are matters which all development in the area needs to consider. The policy therefore needs to set out a framework to secure their future and how they will be incorporated into development proposals to maximise place-making. Waystone Hargreaves Land LLP believe the policy should be amended to better reflect the site’s outline planning permission and progress made since approval. The policy should be revised to state up to 1200 homes by 2028 in line with the condition of the permission, although have no issue with the trajectory of build-out. There is a discrepancy between the total amount of employment land being attributed to the site with 56ha being the total (33 ha in the plan period) but also 63.86ha in a different table. Some of the policy is already a condition to the Outline permission so does not need to be included and there should be additions to the policy to cover waste matters.

**Council response:** Support welcomed. It is proposed to add further wording to the policy to address Historic England’s Representation. Policy 70 A(1) - Paragraph 16.89 of the draft Local Plan sets out the position in terms of the outline permission and condition attached to such consent, which clarifies the number of proposed dwellings (i.e. 1200 by 2028). The policy as drafted, sets out a revised trajectory for the purposes of housing land supply at the settlement to ensure sufficient sites are allocated to meet the plan period requirement. Retaining the 1200 dwellings figure by 2028 would require 150 dwellings pa to be completed every year from April 2020 at the time of drafting, the Council are still awaiting reserved matters applications. Factoring in time for determination, lead-in times, starts on site etc the 1,015 is considered to be more realistic yield. That said, the 1200 dwellings could come forward sooner as per the condition of the outline permission. Policy 70 A(1)* - The footnote is helpful clarity. Policy 70 A(2) & Table 16 - The schedule of 'B type' employment uses in table 16 does equate to a slightly higher total employment land supply of circa 66 hectares for the Unity site compared to the figure (55ha) quoted in the policy and supporting table E3 and explanatory text. It is proposed to make minor amendments to the local plan document to refer to the larger circa 66ha figure therefore for clarity and consistency, but this does not affect the plan period supply from this development which is still 33.6ha within the plan period. Policy 70 E - Part E of the policy it considered to provide helpful clarity. To ensure there is no
overall net loss to the Gypsy and Traveller pitches in order to ensure sufficient pitches are available to meet the community needs in the borough. Policy 70 new criterion - The Barnsley, Doncaster and Rotherham Joint Waste Plan is not to be superseded by Doncaster’s Local Plan. Therefore, waste matters are currently dealt with by a separate DPD, this DPD itself is part of a separate review. Waste sites from that DPD are shown for reference only on Doncaster’s Local Plan Policies Map.

Proposed Changes: Yes – It is proposed to add further wording to the policy to address Historic England’s Representation – see schedule of Suggested Changes proposed (Doc Ref: CDS5).

Supporting Representations from:
Network Rail (0198)
FCC Environment (05273)

Objecting Representations from:
Historic England (0016)
Waystone Hargreaves Land LLP (05301)

**Mexborough**

**Supported Housing Allocation – Site Ref:155 – Leach Lane Industrial Estate, Mexborough**

3.238 Historic England state that the allocation is ‘sound’ as the site lies opposite the Mexborough Conservation Area and on the approach to the Grade II Listed Mexborough Station and Station House. They welcome the Development Requirements relating to Conservation and Heritage. These measures will help to ensure that potential developers are aware of the proximity of these assets and the opportunity the redevelopment of this area provides to enhance their significance.

The Canal & River Trust state that the development requirements should be amended in respect to design and heritage comments.

**Council response:** Support welcomed. In respect to Canal & River Trust’s comments, the design requirements will be updated accordingly with the suggestion. On heritage comments, there is only a small remnant of a building on site that was once part of a building that would have been of local interest - however what now remains is not. These will therefore not be amended and it is noted that Historic England support the site allocation and developer requirements as being ‘sound’.

Proposed Changes: Yes – amendment to design requirement (Appendix 2 – developer requirements) proposed as a minor amendment in line with the Canal & River Trust’s Representation.

Representations from:
Historic England (0016)
Canal & River Trust (03089)

**Supported Housing Allocations – Site Refs: 678 & 927 – Pastures Road, Mexborough**

3.239 Avant Homes Ltd support the allocations and their contribution towards the spatial strategy and housing supply, however object to the identified units remaining on the basis that these sites are now built out.

**Council response:** The capacities are as at April 2018, however the additional build out/site completions are noted. The 2019 RLA provides an updates on housing permissions and completions.

Proposed Changes: None

Representations from:
Avant Homes Ltd (05304 & 05305)

**Rejected Housing Site – Site Ref: 139 – Wath Road, Mexborough**

3.240 Mr Jason Hughes supports that the site is not being proposed as an allocation and that the site should remain as agricultural land which is becoming increasingly in short supply. Countryside Properties object to the site not being allocated. The site is available and in single ownership. Terms have been agreed between the owners. the site is suitable and is a sustainable urban extension. The site is deliverable and Countryside Properties have agreed an option on the site and the development would come forward in the Plan period. The site should be released from the Green Belt as exceptional circumstances can be demonstrated. The site is low flood risk and was previously proposed by the Council as an allocation in the 2018 consultation.

**Council response:** As set out in the Green Belt Topic Paper, the settlement is constrained by the HS2 safeguarding route, physical infrastructure and the borough boundary, as well as Green Belt, which in this location separates Doncaster from neighbouring Barnsley and Rotherham. Site 139 was assessed in the Green Belt Topic Paper and found to be a strongly performing piece of Green Belt with a weak case for continuation in the site selection process. As set out in the Green Belt Topic Paper, it is felt that exceptional circumstances do not exist to justify the release of this site. It is noted the site was originally proposed for allocation, however further consideration of this site led to the conclusion it would not be proposed for allocation at Publication stage. It was brought to the Council’s attention by the local community that the site area included an important southern part that would help facilitate access into the site that is not believed to be in the ownership of the site promoter. The Council owns this land, although the call for sites stated the whole site was in single ownership by the site promoter and has recently had investment in
terms of greenspace and equipment (Manvers Road Park). The shortfall in units for Mexborough has been made good through allocations elsewhere at the Main Urban Area and other Main Towns in line with previous Local Plan consultation.

Proposed Changes: None

Supporting Representations from:
Mr Jason Hughes (05236)

Objecting Representations from:
Countryside Properties (0526)

Policy 71: Mexborough Town Centre

3.241 There was a single Representation of support from Historic England to the policy.

Council response: Support welcomed.

Proposed Changes: No

Supporting Representations from:
Historic England (0016)

Rossington

Supported Housing Allocations – Site Refs:662 & 247 – Rossington Colliery

3.242 Harworth Group PLC states that the southern boundary of site ref 662 needs to be amended to match the outline planning permission masterplan and interface with the boundary of site ref 247. There is also a need to amend the expected delivery rate to 100dpa during year's 0-5 and then 70dpa thereafter from site 662. Amend the indicative capacity of site ref 247 to 406 dwellings in accordance with the illustrative masterplan to be delivered at a rate of 70 dwellings per annum. Amend para 16.129 to state "The Local Plan identifies an additional phase therefore for the colliery to make good the balance of 1,200 units and realise the opportunity to make full and effective use of the former colliery land."

Council response: Site boundaries have been proposed to be amended as noted through a suggested change. The northern boundary would then reflect the permission boundary, and the southern extent of site ref 247 is agreed - although there will be an amendment to the east of this to create a neat and defensible Green Belt boundary. Consequential amendments are also suggested as a change to be made to the site capacities to reflect the anticipated yields as per the Council’s methodology for consistency rather than the Representations’ suggestion for site ref 247. However, Policy 6 allows for more or less housing to come forward on sites
subject to design, so the figures stipulated are not limits. This provides consistency. 247 is thus expected to deliver 349 units now. Similarly, anticipated build outs will remain as per the Council's methodology for consistency, but these are not annual limits, rather informed estimates. Para. 16.129 will be amended as a suggested change also.

Proposed Changes: Yes – suggested changes are proposed to amend/correct the boundary of the permission site with consequential changes to the adjacent allocation and site capacity.

Representations from:
Harworth Group PLC (05205)

Rejected Housing Allocation – Site Ref:123/1040 – Torne Valley Farm, Sheep Bridge Lane, Rossington

3.243 Mr J M Hunt objects to the local plan not allocating the site. When assessed against the SA criteria, site ref 123 and ref 247 (area of unstable land in the Green Belt to the south of Rossington colliery) have similar merits. However, site ref 123 falls down on archaeology and flood risk. The site is not subject to flood risk, and the archaeological concern referred to appears to be related to the old Roman Road and an old Roman fort - 1km and 600m away (and beneath a Park & Ride) respectively. The assessment was carried out on a larger site to what is currently proposed. It is still the same outcome as the assessment of the much larger site which was carried out for the previous Local Plan. The settlement summary (maps) in September 2018 does not feature at all in the text. It would appear the site is so insignificant it does not warrant attention. However, in 2018, site ref 247 was clearly rejected as a housing option for several reasons. The owner of Site ref 123 is entitled to know what has changed in such a short amount of time. Site ref 123 is deliverable, sustainable and fully complies with National Policy and will assist in meeting local demand in the likely event that the former colliery site does not deliver all the proposed dwellings. Site ref 123 is more sustainable than ref 247 and is less detached from the remainder of the settlement. Future residents can use public transport or access the park and ride. In south - east Doncaster there is little choice for both future residents and smaller builders. It is disappointing the Local Plan favours volume builders, especially given the economic stimulus provided by the airport and PGA golf course. There is clear evidence (including current delivery and para. 16.129 of the policy text) which shows that there are doubts about what the colliery can contribute towards housing need in the plan period. Therefore, there is an objection to the site. The proposal also remains consistent with draft policy 2 (5) - proposed development adjacent to a development limit. The site should be allocated, and the Local Plan should be amended to make a clear statement that the Planning Authority will support reasonable and sustainable proposals submitted by small builders which meet the objectives of the Local Plan.
Council response: An amended site boundary for this site has been considered (site ref 1040) and hence the fact the site has an original reference (site ref 123) and more recent one which reflects the smaller site as requested to be considered by the site promoter’s Agent. The site was reassessed with the findings published as part of the 2018 consultation so not clear why the Representation claims that no account has been given to this. However, there are still flood risk concerns as the site would lead to inappropriate development in an area of high flood risk so failed the sequential test. Furthermore, as Rossington can meet and surpass its housing targets via permissions and urban sites, there is no need to release land in the countryside for development. Housing at Rossington Colliery is being delivered and sites 662 and 247 will deliver a significant amount of housing - the Council are confident in the delivery of this. For clarity, site ref 247 is not Green Belt and is part of the UDP Colliery designation.

Proposed Changes: None

Representations from:
Mr J M Hunt (01789)

Rejected Housing Allocations – Site Refs:302/305 – Stripe Road, Rossington

3.244 Firsure object that the site is not allocated for housing. Technical information and advocacy report have been submitted alongside earlier representations. A report on the Role and Growth of Rossington is submitted as part of this representation. There should be further growth of Rossington to address regeneration and the provision of new infrastructure. Particularly concerned that in Rossington there is only a single small housing allocation and an over reliance on one large allocated site (formed by site refs: 662 and 247). The role of Rossington should be the focus for growth and regeneration, given its strategic location next to the M18 with new infrastructure in the form of the Great Yorkshire Way, provision of major employment opportunities at i-Port and the airport, forming the largest employment allocations within Doncaster, which are adjacent to the settlement. Furthermore, the proposed new PGA golf course is adjacent to Rossington. With major expansion plans at the airport 'Aetropolis', Rossington is in a prime strategic location to benefit from such plans and associated housing should be provided to ensure Doncaster benefits from such inward investment. Concerned about the deliverability of a number of allocations within Rossington, namely Site 662 and 247 and 1056. Based on this it is clear that the deliverability and delivery rates of some of the sites in Doncaster ought to be reviewed to ensure that they reflect the site specific circumstances. Further allocations are required in to ensure that the delivery of the plans strategy. The councils site selection summary indicates Green Belt release cannot be justified as housing need is being met. However it is maintained that the Plan does not identify sufficient sites to meet the needs of the area. The proposed site is available, suitable and achievable and is therefore a deliverable site able to come forward in the short term. The site can make an efficient and attractive use of
the land and be delivered within an appropriate and sustainable location within Rossington. The site is located in a highly sustainable location and has residential development to the north, east and west. It is within easy walking distance to local centres with a range of facilities provided there as well as greater facilities within Doncaster Town Centre, a bus ride away. There are a large number of primary and a secondary schools in the vicinity of the site and is well served by buses providing opportunities for sustainable travel to work in Doncaster and beyond with access to Doncaster Railway Station. Contextually, the site is "contained" by development and activity being a "tongue" of land which protrudes into the urban area of Rossington surrounded by residential properties and the East Coast Main Line, beyond which is non-Green Belt countryside. Within this context the release of the site from the Green Belt has limited impact on "openness" and that redevelopment of the site would have low impact on the purposes of including land within the Green Belt. The site will not lead to unrestricted sprawl or encroachment. The site is a protrusion of Green Belt into Rossington and is contained within its setting. The site would not therefore lead to the coalescence of towns. Whilst the development would result in development of some countryside the degree of encroachment into the countryside would be minimised. The site has no impact upon the setting of a historic town. It is proposed that the new Green Belt boundary follows Stripe Road, Common Lane and the East Coast Main Line which is clear and well defined and would be a "rounding off" of Rossington. The site is achievable. A range of technical work is being undertaken and further survey work is ongoing. From initial assessments there are no technical issues that would prevent development or are insurmountable. The site is an effective Use of Land. Although greenfield, the proposed scheme will utilise and enhance existing infrastructure. The site is easily accessible and the proposed main access is off Stripe Road. The scheme is therefore making an efficient and effective use of land and infrastructure.

**Council response:** Supply at Rossington is healthy and can surpass the housing target for the settlement without utilising Green Belt. There is therefore no need to allocate further land in this settlement, less so Green Belt. Suitable additional allocations on urban sites have been made, however. Overall the borough can meet and surpass its housing targets and most settlements can meet their housing targets, or get within their ranges. Those that cannot are offset by supply elsewhere. This is explained in the Housing Topic Paper.

Proposed Changes: None

Representations from:
Firsure (05215)

Rejected Housing Allocation – Site Ref:306 –

Rossington Hall Investments (RHI) object that the site is not allocated for housing. RHI consider the site would represent a sustainable urban extension that is not at
risk of flooding, close to shops and community facilities and existing and future employment opportunities. RHI suggest that in addition to the Reserved Housing Allocations, Safeguarded Lane should be included in the Local Plan.

**Council response:** There is no need to allocate any more land at Rossington, and the site is a Green Belt site which scored moderately weakly overall. As such, the allocation is not justified, and the matter is further covered in the Housing Topic Paper and Green Belt Topic Paper.

Proposed Changes: No

Objecting Representations from:
Rossington Hall Investments (04297)

**Thorne-Moorends**

**Supported Housing Allocation – Site Ref: 133 – St Nicholas Road, Thorne**

3.245 Abernant Homes Ltd support the allocation and confirm that the site is next to be developed upon completion of their current project (Aldi supermarket) and that the Town Council is supportive of the site. Considering an element of retail use on the site also. Historic England suggest the site allocation should be deleted as the site adjoins the Thorne Conservation Area and makes an important contribution to the setting of the Conservation Area and the proposed capacity of 24 units is not realistic.

**Council response:** Support welcomed. Potential for an element of retail use are noted. The site has been identified via the emerging Thorne-Moorends Neighbourhood Plan as one of only a few sites available that are not constrained by flood risk. The capacity of 24 units is as per the Neighbourhood Plan also. Capacities in the Local Plan are indicative and not binding. The Local Plan housing allocation policy (Policy 6) states that schemes with a lower density will be supported where they result in a better design solution. The developer requirements also set out some of the considerations that an application will need to take into account at the Development Management stage. Notwithstanding this, it is proposed to add further detail to the developer requirements (Appendix 2) to emphasise some of the important design considerations/constraints/solutions that will need to be overcome.

Proposed Changes: Yes – suggested change to the developer requirements at Appendix 2 in line with Historic England’s Representation. See Doc Ref CSD5 for further details.

Representations from:
Abernant Homes Ltd (1013)
Historic England (0016)
Rejected Housing Allocation – Site Ref: 238 - Land off St Nicholas Road, Thorne

3.246 Abernant Homes request the site is allocated for housing and state that the Town Council is supportive of the site.

Council response: The site has been assessed by the Neighbourhood Plan, but is not being supported due to the loss of trees on the site. The Local Plan does not intend to conflict with this. The site is designated as Residential Policy Area so could come forward as windfall development if such matters can be addressed to the satisfaction of the Development Management process.

Proposed Changes: No

Representations from:
Abernant Homes Ltd (05292)

Rejected Housing Allocations – Site Refs: 245/313 – Micklethwaites Farm, Moorends

3.247 H Burtwistle & Son object that the sites are not allocated for housing. Concerned that the Local Plan is not producing sufficient homes across the Borough. The proposed distribution of new homes does not reflect the spatial strategy and does not address the focus for economic and housing growth across the Sheffield City Region and Yorkshire and Humber as a whole. The proposed distribution against the Council's own targets shows a deficiency and a significant under provision. Consider that with the proposed allocations and the deletion or adjustment in anticipated delivery within the plan period of sites 081/343, 795 and 510 that the Local Plan can be found sound. To address the identified deficiencies in the Plan Site refs: 245/313 should be allocated. Deliverability - the site is available, suitable and achievable therefore considered deliverable. Availability - the land is being promoted by H Burtwistle & Son and considered available. Suitability - the site is located in a highly sustainable location and has residential development to the south and east, within easy walking distance to the centre, which has a range of services and facilities. Well provided for area with well served public transport and number of schools. Therefore considered that the development is suitable. Achievable - object to the site being discounted in relation to flood risk as technical work has been submitted to demonstrate that the site is developable. Therefore, considered achievable. Effective Use of Land - Although greenfield, the proposed scheme will utilise and enhance existing infrastructure. And is currently under-utilised. The site is easily accessible. Delivering a Flexible Supply of Housing - the site is deliverable in the short term and will reinforce the housing supply and address the Borough's housing needs in the early periods of the Local Plan. The site is suitable for housing and can deliver circa 400 high quality new homes including affordable housing.
Council response: Both sites 245 and 313 are in Flood Zone 3, where no allocations are being made due to failure of the flood risk sequential test. Aside from Mexborough, the Main Urban Area and all the Main Towns mentioned are only short against the top of their ranges. As the Housing Topic Paper explains, not all of these settlements need to meet the top of their range, as long as the overall number balances out at approx. 90% of housing in these two areas, which it does. Overall the borough is delivering enough housing across the plan period, and shortfalls are made up for in other areas. Sites have been identified on land in each settlement in the hierarchy.

Proposed Changes: No

Objecting Representations from:

H Burtwisite & Son (03506 & 03507)

Policy 72: Thorne Town Centre

3.248 There was a single Representation of support from Historic England to the policy.

Council response: Support welcomed.

Proposed Changes: None

Supporting Representations from:

Historic England (0016)

Services Towns & Villages

Askern

Supported Housing Allocation – Site Ref:925 – Highfield Rd, Askern

3.249 Mr David Fielder supports the allocation of the site (Outline planning permission).

Council response: Support welcomed.

Proposed Changes: None

Supporting Representations from:

Mr David Fielder (05300)

New Housing (Mixed –Use) Site – Land Adjacent to Askern Saw Mills (Site Ref:569)
3.250 Mr Ian Murray submits a new site Representation adjacent to the allocated mixed use Askern Saw Mills site (Site Ref: 569) on land designated as Green Belt. The site is suitable, deliverable and developable and would be a logical extension to the Saw Mills site. The Representation has undertaken their own assessment against Green Belt Review tests to justify its removal and allocation for housing. The site would support the: growth of Askern and safeguarding development within the settlement boundary; retention and safeguarding of the provision of open space to the north of the site; and, provide an opportunity to deliver residential (and possibly employment uses) which will complement the adjacent mixed use development site. Recommend that the development limits boundary of Askern is amended to include the represented site as well as the adjacent former Askern Saw Mill site.

Council response: The Representation is the first time the site has been put forward for consideration through the Local Plan process so has not been assessed to the same level of detail as other sites through the methodology. However, as set out in the Green Belt Topic Paper, no Green Belt is to be released in Askern as it is not deemed that there are exceptional circumstances to do so. The settlement can deliver housing far in excess of its requirement without needing to release Green Belt. Development limits have been drawn in line with the methodology and has been subject to previous consultation. There are no exceptional circumstances identified to include the Green Belt site adjacent to the Saw Mills either as an allocation or within the development limits for the settlement.

Proposed Changes: None

Objecting Representations from:
Mr Ian Murray (05309)

Auckley & Hayfield Green

Rejected Housing Allocation – Site Ref: 446 – Blaxton Quarry, Phase 2, Mosham Road, Auckley

3.251 South Yorkshire Housing Association and Mr Oliver Lund object to the site not being allocated for housing. South Yorkshire Housing Association’s Representation includes an extensive site assessment of the site as well as comparison with other sites in the locality. It states that landowners have confirmed interest from SYHA Enterprises to bring the site forward. Proposes that the site should be allocated as it is part of the DSA Masterplan. Mr Oliver Lund’s Representation concludes that the Local Plan contains significant deficiencies in relation to the site and the strategic policies and the distribution of growth. Representation provides a legal interpretation of the definition of 'previously developed land' and concludes that the site has not blended into the landscape and is not subject to any development management procedures to restore the land. The Site is therefore previously developed land and its redevelopment should be a priority. The Sustainability Appraisal fails to properly
assess the site as brownfield land. Consequently the evidence on which the Local Plan allocations are based is inaccurate and the Local Plan is unsound and inconsistent with national policy.

**Council response:** There is no need to allocate further land in this settlement for housing as it can meet and surpass its targets, and there is also potential additional housing being allocated adjacent to the airport linked to the proven delivery of jobs. Sites would still be needed in other settlements in the borough so this would not negate the need for Green Belt allocations, as per the Green Belt Topic Paper. The site has been designated as countryside as per the development limits methodology. There is no need to allocate more housing in this location. Policy 7 is specifically related to the airport and airport related development and provides for a significant amount of housing tied to the delivery of jobs, and supports elements of the draft airport masterplan - however this is an independent document and the Local Plan's role is not to reflect this verbatim, rather it supports certain elements of it. This site is considered to be a greenfield site as it had restoration conditions attached to the permission. See response to Sustainability Appraisal (and the Addendum to the Sa Report) for more details on the Representation’s challenges to SA.

Proposed Changes: None

Objecting Representations from:
South Yorkshire Housing Association (05214)
Mr Oliver Lund (05286)

**Rejected Housing Allocation – Site Ref:1010 – Gatehouse Lane, Auckley and Land Adjacent to the Railway Line**

3.252 Peel Land & Property Management Ltd object that the site is not allocated for housing. This site is in the airport masterplan for residential development. It should be removed from the countryside and allocated for residential use. It lies to the east of Hayfield Green and an outline for up to 150 dwellings is currently being prepared by Peel to be submitted shortly (now submitted). The site was previously a quarry and derelict buildings remain on a portion of the site. It is on the edge of Hayfield Green with strong, defensible boundaries and development to the east, south and west, meaning it is a logical conclusion to Hayfield Green. It is no longer logical countryside as it is separated in all directions from this. It could deliver a sustainable housing site with a range of housing types in line with market demand, including affordable homes, as well as open space, and will strengthen the character and definition of the settlement. The requests are appropriate as it is a more positive approach to providing the full level of housing need that the housing assessment identifies could be reasonably associate with supporting the Council's economic aims, i.e. 1,060 dpa required. Notwithstanding this and independent of housing controlled in Policy 7, Peel contend there is a shortfall of 300 homes as a result of the reduction from 750 units to 450 units on the Hurst Lane application.
The Local Plan Housing needs assessment assumes full delivery of the 750 units consented on this site; if the committed shortfall not provided elsewhere in the vicinity, then there will be an under-delivery against the numbers assumed in the Local Plan evidence base. Recent outline permission for 140 homes at land on Hayfield Lane (Site Ref: 223) reduced this to 160 dwellings. The principal of applying this shortfall was considered at planning committee. The allocation of Gatehouse Lane would ensure this shortfall is positively planned and accounted for in the Local Plan. It would also stop 3rd party developers speculatively claiming this shortfall and submitting speculative planning applications on less suitable sites. Policy 7 does not allocate Land north of Doncaster to Lincoln railway line. This site is in the masterplan as a community rail station with parking and residential. This should be removed from the open countryside and allocated for residential / mixed use development. Development limits should be amended to include this. The landowner is making more detailed representations. The allocation will assist with the delivery of a community rail station in the event this option is required (if the ECML preferred line does not happen). The requests are appropriate as it is a more positive approach to providing the full level of housing need that the housing assessment identifies could be reasonably associate with supporting the Council's economic aims.

**Council response:** Auckley - Hayfield Green can meet and surpass its housing target via existing commitments. There is no need to allocate any further land here. Additionally, there is further housing linked to jobs adjacent to the airport. Re: the shortfall and whether this can be made up on other sites - this was a matter related to that planning application and was a matter of judgement for the decision maker / committee at the time. It is not part of Local Planning Policy and therefore irrelevant to decision making for the Local Plan, where the focus is on delivering the specified growth in the places it is needed. The fact less will be delivered at Hurst Lane than originally anticipated has been factored in to housing calculations. The site is excluded from the development limits as per the development limits methodology. Land to the south of the railway line has been set aside for a potential station site. This site is not the preferred station site and it is unclear whether or not it will be needed. Sufficient land has been accommodated to support its delivery, and there is no need to allocate land north of the railway line in addition.

**Rejected Housing Allocation – Site Ref:1013 – Common Lane, Auckley**

3.253 The Strategic Land Group object that the site is not allocated for housing and can deliver within the plan period. Land to the north of this should be allocated or allocated as a reserve development site. The site has no flood or green belt constraints as is on the edge of the settlement limit of Auckley which has no allocations despite Airport proximity. There is no evidence of a non-implementation allowance. In line with local plan expert group recommendations, a buffer equivalent to 20% of the housing requirement should be planned for. Site 1013 is available, achievable and in a suitable location outside the Green Belt and areas of flood risk.
It is deliverable in the plan period. Auckley should be a standalone village and therefore have its own requirement separate from Hayfield Green. None of the existing requirement is in Auckley, it is all in Hayfield Green. Land should be sought in Auckley. This is the only site on eastern Auckley proposed. It is accessible to services and amenities in the settlement and free of constraints. It would bring sustainable growth to Auckley and align with proposed growth in the borough given its proximity to the airport. The site is countryside but the countryside was noted in the sites and policies DPD as not being assessed for its special qualities, does not have a special status and therefore should be removed as a designation. The airport are aiming to create an aerotropolis and this would help transform the north of England with 73,000 jobs, investment, employment opportunities, a railway station. There is strong logic to allocate land in this location not constrained by flood risk or Green Belt. The site is subject of an outline application 17/02278/OUTM for residential development of up to 82 dwellings. The documents show there are no technical barriers to deliver. The application was refused but the reasons related to hedgerow removal can be overcome. The other reason for refusal was countryside. There were no objections otherwise from Council or external consultees. Site 1013 has been found to be sustainable as acknowledged by the Council in the outline application. The only barrier is the settlement hierarchy which is inflexible and does not account for lack of constraints, less impact on the Green Belt or airport proximity. Auckley is a relatively sustainable larger village with good links to Doncaster, the M18 and the airport and the site requires no Green Belt release, nor is it in an area of flood risk. The allocation could provide a mix of dwellings, affordable housing and open space including allotment extension. Safeguarding land adjacent could contribute to a buffer of safeguarded sites to be drawn from when required. All other sites are in Hayfield Green and there is a case for identifying land for aspirational economic growth on unconstrained land. This is in line with national policy and would significantly boost the supply of housing in support of aspirational economic growth. Request 1013 is allocated an land adjacent is identified as a reserve development site.

Council response: There is no need to allocate any more land in Auckley - Hayfield Green as the settlement can already surpass its housing target via commitments and the preferred allocation (now permission) in the settlement. The calculations do not take account of a number of additional sources of supply, including windfalls, sites with permission in defined villages, small sites of 1 - 4 units and any housing delivered as part of Policy 7. In effect, there is therefore a buffer and some protection in terms of numbers against non - delivery - although the Site Selection Methodology justifies the assumptions made about build out rates. It should also be noted that Auckley Parish Council are preparing a Neighbourhood Plan and have undertaken a Call for Sites, which may result in sites being found within Auckley itself.

Proposed Changes: No
Objecting Representations from:
The Strategic Land Group (04444)

**Barnburgh & Harlington**

**Supported Housing Allocation – Site Ref:777 – Plot 3, Doncaster Road, Harlington**

3.254 R & I Richardson, MH Richardson & R Durdy support the allocation of the site for housing and provides supporting evidence on the sites deliverability. Mrs Jeanette Hepworth objects to the allocation. Would like to see archaeological report in respect to the site. House prices would be devalued; is there any compensation for residents? HS2 is already proposed near the village which brings no value with it. The appeal of the village is the surrounding countryside and saturating with houses will demoralise this small community. Access concerns - Church Lane has a single vehicle access point. There is already enough children’s play space in the village. Would result in more traffic and highways will be dangerous as already a route for workers at Manvers. Would like to see the Transport Statement. The site is not a small infill gap but 2 fields which are homes for horses which provide physical activities for the residents and a feeling of open space and countryside living that residents have bought into when purchasing their houses. Loss of views. Site is at risk of flooding and contributes to the local distinctiveness and should be protected as Green Belt and is inappropriate for development. No support from local residents for the site. Lack of infrastructure in the village (schools, buses, drainage). No benefits to the village from building more houses. Allocating the site contradicts many of the local plan policies in respect to Green Belt and Countryside and will set a precedent for more loss of Green Belt. Cllr Jonathan Wood & Cllr Cynthia Ransome also object. The Joint Rural Parishes request justification and clarification in respect to the removal of land from the Green Belt.

**Council response:** Support welcomed. In response to Mrs Jeanette Hepworth, South Yorkshire Archaeology Service have assessed the site for any potential archaeological impacts and recommended that further exploration would be required at application stage to inform development. The Highways team are satisfied that suitable access can be taken from Church Lane. The site itself is not in an area of flood risk, although it is close to a functional floodplain to the south. The Local Plan developer requirements cover what is needed to help make this site deliverable. The Green Belt Review and Green Belt Topic Paper explain why exceptional circumstances exist which justify the release of this site.

Proposed Changes: No

Supporting Representations from:
R & I Richardson, MH Richardson & R Durdy (05302)
Objecting Representations from:
Mrs Jeanette Hepworth (05047)
Cllr Jonathan Wood (01404)
Cllr Cynthia Ransome (01394)
Joint Rural Parishes (04013)

Rejected Housing Allocation – Site Ref: 1003 - Paddock adjacent to Manor Farm, Hickleton Road, Barnburgh

3.255 Mr Martyn Burke objects that the site is not allocated for housing. The site has development on three sides of the site and, although Green Belt, would meet the five objectives of Green Belt designation. Compared to the proposed site at Harlington (Site Ref: 777) this site is larger and less exposed and considered to be an alternative or additional allocation to provide resilience should demand increase.

Council response: The site has been assessed in the Green Belt Review and has been found to be more impactful on the Green Belt than site ref: 777. The Green Belt Review and the Site Selection Methodology both explain why site ref: 777 is the preferred option in this location, and also the exceptional circumstances which justify the release of site 777 (and why there are no exceptional circumstances which justify the release of site 1003).

Proposed Changes: No

Objecting Representations from:
Mr Martyn Burke (05287)

Barnby Dun

Supported Housing Allocation – Site Ref: 147 – Hatfield Lane, Barnby Dun

3.256 R Crowe, G Platts, J Lodge, S Hanson, MA & JM Youdan support the allocation of the site for housing, but objects that the site area shown for housing is not the same as previous representations/consultation of this site and the eastern edge has been reduced by at least 50 metres with no justification for this reduction. The map should be amended to reflect previous boundary and a gross site area of 11.65ha and not the 10.11ha as listed in table H2L. The EA Flood Map for Planning (as shown on the Policies Map) extends into the housing allocation but does not correlate with the technical survey work based on site levels and should be amended as per the accompanying masterplan. The allocation should be included within the development limits of Barnby Dun. A petition with 370 signatures objecting to the housing allocation has been submitted. The text states that villages across Doncaster are set to sprawl under housing proposals in the local plan. Whilst there may be a need for housing there is a consensus throughout Doncaster and Barnby Dun that the quantity proposed far exceeds the borough's infrastructure capacity. Alternative
sites should be allocated which impact less on existing residents, infrastructure and amenities. Consultation has been relatively well advertised, but there has been shortfalls such as hidden signs adjacent to the proposed site. Mr Daniel Meekin objects. Neighbouring properties that are adjacent to the site ref are affected. Site ref 108 (rejected allocation) only impacted on 7 existing houses rather than the 60 affected by site ref 147. Loss of views will devalue property prices and compensation for residents should be provided. Bungalows would have least impact on existing properties and should be landscaping such as hedgerows. Loss of wildlife also needs to be considered. 3 storey town houses should not be allowed and need to ensure no breaches of the Right of Light Act 1959. Publicity of the local plan was insufficient. There was only a single site notice posted adjacent to the proposed allocation which was poorly located which is unacceptable and most of the village were unaware until the local community took direct action.

Council response: Support welcomed. The site density has been calculated using the HELAA methodology and also takes account of the fact some of the site is undevelopable due to flood risk. Barnby Dun only requires 105 new dwellings overall. Policy 6 does allow for higher or lower densities if it would result in a better design solution. The allocation has been reduced in size to reflect that there are large areas in flood zone 3 where the site selection methodology has set out built development will not be supported in line with the sequential approach to avoidance of flood risk. The EA Flood Map for Planning has been the basis for applying the sequential test consistently across all site options. Development limits have been identified in line with the methodology which has been subject to previous consultation and was clear that greenfield allocations will sit outside of the settlement where identified on the edge of a town/village but will be incorporated through future review of the plan when permission has been implemented and full details are known in respect to layout etc. Objections are noted. The site has been identified in line with the spatial strategy and settlement hierarchy as Barnby Dun, being a Service Village, has a local housing need allocation of 105 dwellings over the plan period and there are very few existing sites with permission to meet this target. The site has been identified through the site selection process and its overall size/allocation has been reduced to reflect concerns around the potential for more than the 105 dwellings identified on the site. The Local Plan is supported by an Infrastructure Delivery Plan and policies in the plan provide for contributions towards improving the capacity of infrastructure, such as schools. The Representation does not identify which alternative sites should be allocated instead, nor where such sites may exist that do not impact on existing residents or infrastructure. One of the core principles of national policy is to bring forward sustainable development in locations where people want to live and have access to services and facilities. Matters of views or house values are not planning matters. The Council went to great strides to publicise the informal consultation when this site was initially proposed, including press articles, signs and meeting the Parish Council in 2018 to discuss plans. The volume of responses show that the public were sufficiently made aware of this site.
Proposed Changes: None

Representations from:
R Crowe, G Platts, J Lodge, S Hanson, MA & JM Youdan (05187)
Petition 5 (05320)
Daniel Meekin (04517)

Rejected Housing Allocation – Site Ref:108 - White House Farm, Bramwith Lane, Barnby Dun

3.257 Mr Alex Parkin-Coates objects that the site is not being allocated for housing. In comparison with the supported allocation (Site Ref:147), the site is a Brownfield site which are supported by NPPF and is located in the same flood risk zone. The supported allocation has potential issues in respect to access and impact on highways and impact on the Countryside. Initial flood risk work indicates that the site can be developed with mitigation of risk. Allocation of site ref: 108 is in compliance with NPPF para’s 9 & 32. The Representation provides in depth supporting information covering natural environment, urban form, highways, infrastructure and flood risk as to why site 108 should be allocated.

Council response: Do not agree that the site is brownfield. The portion of site 147 allocated for housing is in Flood Zone 1. The Site Selection Methodology explains how decisions have been made about allocations in this settlement, and it is felt that Site 147 constitutes the best site option in Barnby Dun.

Proposed Changes: No

Representations from:
Mr Alex Parkin-Coates (05193)

Bawtry

Supported Housing Allocation – Site Ref:141 – Westwood Road, Bawtry

3.258 Barratt & David Wilson Homes supports the allocation of the site for housing. Bawtry Town Council objects to the allocation due to loss of Green Belt and there are no exceptional circumstances demonstrated to justify the decision. At just 20 dwellings the site contributes little towards the settlement’s requirement. Other site options have been rejected that may have been more suitable and not Green Belt. Also raises concerns about cross boundary working with neighbouring authority (Bassetlaw District Council) in respect to development across the borough boundary at Harworth and its impacts on the local road network and lack of Section 106 monies.
Council response: Support welcomed. The site has been assessed through the site selection methodology and this includes the findings from the Green Belt Review. Exceptional circumstances have been set out in the Green Belt Topic Paper. 20 dwellings yield from the site contributes 18% of the settlement's housing target and is considered significant therefore. Joint Feasibility work has been carried out with Bassetlaw DC as part of preparation of their emerging Local Plan. See Duty to Cooperate section also.

Proposed Changes: No

Representations from:
Barratt & David Wilson Homes (04955 & 04956)
Bawtry Town Council (0737)

Rejected Housing Allocation – Site Ref: 146 – Tickhill Road, Bawtry

3.259 Barratt & David Wilson Homes object that the site is not allocated for housing. The site has been rejected due to being Green Belt but contends that Green Belt Review and methodology was flawed. The site is part of a much wider assessed parcel and does not agree with this and the site should have been assessed on its own merits. The Representation includes a full rebuttal to Green Belt assessment by Golby & Luck.

Council response: Site 146 is a large Green Belt extension which scores as having a moderately weak case for removal from the Green Belt. It is not deemed that exceptional circumstances exist which justify the release of this site.

Proposed Changes: No

Objecting Representations from:
Barratt & David Wilson Homes (04955 & 04956)

Rejected Housing Allocation – Site Ref: 996 – West of Bawtry Hall, Bawtry

3.260 The Gascoine Group Ltd object that the site is not proposed for housing. The Representation has reviewed the supply at Bawtry and conclude that 18 to 20 units can be discounted from Bawtry's supply. See Representation below (Site Ref: 1017) for further details.

Council response: Disagree with assessment that site numbers can be deducted. Yields are based on planning applications or the HELAA methodology as agreed by the stakeholder group. Confident that numbers proposed can be achieved and there is no need or justification to release further land in Bawtry.

Proposed Changes: No
Representations from:
The Gascoine Group Ltd (04430)

Rejected Housing Allocation – Site Ref:1017 – Martin Lane, Bawtry

3.261 Wilson & McKay Families object that the site is not being allocated for housing. The site being promoted is approximately 5.4ha of Land at Martin Lane which sits on the northern edge of the settlement of Bawtry. The site is promoted for approximately 100 dwellings. This site forms part of a larger parcel of land of approximately 55ha which has been previously promoted. This larger parcel remains available. However, at this stage the Representation seeks the allocation of the smaller parcel. These changes have been made to address previous concerns regarding the scale of the site and its impact upon the Green Belt. Following a review of sites in Bawtry, it is felt 18 - 20 units can be discounted from supply, further justifying the site to the west of Bawtry Hall as follows:

- Site Ref: 950 - Original planning permission on the site, application ref. 14/01733/FULM, was granted in 2016. Condition 1 requires the permission to be commenced by 20th October 2019. No evidence available to suggest that conditions have been discharged and the development will commence in time;
- Ref: 966 - Planning permission ref. 16/00733/FUL expired on 7th June 2019. As confirmed by the consultation document, the development has not commenced. No further applications have been submitted to the Council and the intention to development the site is in doubt. It is recommended to remove the allocation.
- Ref: 982 - Retirement housing. Accommodation is restricted to persons over 60 years of age.
- Ref: 141 - Green Belt site. Exceptional circumstances considered to exist to justify removal from Green Belt. Council allocate the site for 20 dwellings, however the site layout submitted as part of planning application 16/01672/OUTM (withdrawn) illustrates a capacity of 14. It is recommended to remove 6 dwellings from the allocation.
- Ref: 499 - Allocated for 16 units in the 0-5 year period. Given the size, shape and orientation of the site, Representation believes the site could realistically deliver 10 - 12 units. This is a proposed allocation only and no evidence is provided to show that the site will come forward in the 5 year period expected by the Council. It is recommended to remove 4 -6 units from the allocation.

Council response: The newly promoted smaller site boundary is acknowledged although has not been assessed given the site was revised post Publication of the Local Plan. Disagree with assessment that site numbers can be deducted. Yields are based on planning applications or the HELAA methodology as agreed by the
stakeholder group. Confident that numbers proposed can be achieved and there is no need or justification to release further land in Bawtry.

Proposed Changes: No

Objecting Representation from:
Wilson & McKay Families (05172)

**Carcroft & Skellow**

**Supported Housing Allocation – Site Ref:165/186 – Crabgate Lane, Skellow**

3.262 Mr Turnbull supports the allocation of site. The settlement is the largest of the Service Towns/Villages and a sustainable location with a good range of services. The site’s total 15.11 ha with an indicative capacity of 300 dwellings. It is not known why the site is identified as developable in years 6-15 of the plan period, the site is available and deliverable early in the plan period. Objects to the Policies Map as the site should be included within the development boundary as they will form part of the settlement and should therefore be within the residential policy area. Metacre Ltd also supports the allocation (site ref: 186) and that it is identified as being able to deliver 300 dwellings in conjunction with site ref: 165. The site is a suitable location which can be well designed. Site 186 is also available as a stand-alone site for 135 units and is the most suitable parcel of the two being the southern one - however it is accepted that a comprehensive well designed development would be necessary and will provide links to Site 186. Houses here will help meet the borough housing requirement, and also have wide economic benefits in terms of construction jobs and household expenditure when constructed. Strongly support the inclusion of this site in the Local Plan allocations, and the site has a willing landowner. The CPRE objects to the allocation on the basis that the site is too peripheral to the settlement to be considered as being sustainable. A number of residents also object (Amy Damms; Mr Vincent Woods; Mrs Jeanette Woods; and, Mrs Linda Mitchell) on the basis that the site is Green Belt and should not be developed based on the Council’s own Local Plan Policy 3 part 6. If the site was developed then would result in loss of countryside views, loss of wildlife and devaluation of property value. Would also impact on the quietness of the area. The highway network is insufficient already and the A1 is regularly congested and the slip road is not long enough and would all be exasperated by further development. Local amenities are also insufficient and at capacity, such as GP and schools. The site is at risk of flooding and has flooded twice in the past 7 years – what guarantees can be offered that development will not increase flood risk to existing property.

**Council response:** Support welcome. A table of allocations is provided in Chapter 16 of the Plan. The build out rates are explained in the HELAA methodology, but these are an assumption, and it is acknowledged that sites may be developed
before or after this point. The developer requirements map does not denote Green Belt, rather it reflects the red line boundary for sites 165 / 186. As per the development limits methodology, the site will not be included in the development limits as it is a greenfield allocation, however it will be shown as an allocation and removed from the Green Belt. Disagree, the site results in a rounding off of the built form in this location, is not isolated and no more distant from existing services that the current residences in this area. Policy 2 part 6 applies to decision making, however as explained in the Housing Topic Paper and Green Belt Topic Paper, the release of Green Belt is sometimes necessary when justified by exceptional circumstances, as in the case of this site. The Council is not responsible for NHS run GP surgeries or the funding of these, although the Council have liaised with the CCG (and other relevant infrastructure providers) on the Local Plan. The education team have assessed the impact on schools in the borough and the developer requirements note where money will be required as part of future planning applications for housing. Please see the Infrastructure Delivery Plan for more details. The impact of development on both the local and strategic road network has also been assessed by AECOM and Highways England respectively with recommendations made on how to mitigate any forecast impacts in the transport modelling reports / IDP. Funding for improvements necessary to make good development will be requested from developers through section 106 agreements. Open Space or open space contributions are set out in the developer requirements. The Council has produced numerous Green Space information both before the Local Plan and as part of the process. The Green Space Audit is now seven years old and will be updated following the adoption of the Local Plan. The site is not identified as being at risk from flooding but a site specific Flood Risk Assessment will be required given the size of the site (i.e. above 1ha) in line with both national and local policy.

Proposed Changes: A minor cartographical amendment has been proposed to the site plan at Appendix 2 to align with the same site boundary as shown on the Policies Map.

Representations from:
Mr Turnbull (03259)
Metacre Ltd (05173 & 05174)
CPRE (0077)
Amy Damms (04610)
Mr Vincent Woods (05267)
Mrs Jeanette Woods (05269)
Mrs Linda Mitchell (05285)

Rejected Housing Allocation – Site Ref:185 – Mill Lane & Crabgate, Skellow

3.263 Metacre Ltd object that the site is not allocated for housing. New homes in this settlement will make an important contribution to meeting the housing
requirement for the borough but will also have borough wide economic benefits in terms of construction impacts and household expenditure when built. Disagree that being in flood zone 2/3 should rule this site out. The flood zone is only on a small part of the site and does not make the site unusable in its entirety. It can be designed in a way that excludes flood zone development and mitigates flood risk across the site. All residential land would be in flood zone 1 and would therefore not fail the sequential test. Client also promoting 186 and so 185 will assist in providing flexible land supply in this location. It can be brought forward in a timely manner to assist with housing supply in the borough.

**Council response:** Almost 22% of the site is in Flood Zones 2 and 3 (19% in the latter). Furthermore, the site was considered in the Green Belt Review and found to have a weak case for inclusion in the Site Selection Process. In both flooding and Green Belt terms, site 165/186 is preferable, being less impactful on the Green Belt, able to demonstrate exceptional circumstances, and containing no land at risk of flooding. If site 165/186 are allocated, no further land is required in this location.

Representations from:
Metacre Ltd (05173 & 05174)

**Rejected Housing Allocation – Site Ref:273 – Askern Road, Carcroft**

3.264 Priority Space Ltd object that the site is not allocated for housing. Housing allocations are not producing enough homes across the Borough. There are under provisions in numerous settlements. The Spatial Strategy is incorrect and the status of Carcroft/Skellow should be allocated commensurate with its role and function. Figures in each settlement should be minimums to be achieved to allow for more flexibility. The site should be allocated and an in depth advocacy of the site is included in the Representation. Proposed Allocation site ref:165/186 should be deleted or the expected yield reduced.

**Council response:** Overall the borough is meeting its housing targets, and generally settlements are too, where suitable and justified sites exist. The Main Urban Area and Main Towns use ranges and all but Mexborough, due to numerous constraints, are within or at the top of these. Not all settlements need to deliver at the top of the ranges, if they all did there would be an oversupply of housing in the borough. Most of the Service Towns and Villages meet, surpass, or almost meet their targets, with the exception of Tickhill which falls short due to Green Belt and access issues, and a lack of existing commitments. However, the shortfall in areas is picked up in other areas. Site 273 is in Flood Zone 3 and therefore not appropriate to allocate having failed the flood risk sequential test. 165/186 is not flood risk and has a moderately strong case for removal from the Green Belt, and it is deemed that exceptional circumstances exist that justify this site being removed from the Green Belt and allocated. It is not clear why, therefore, site 273 is preferable.
Proposed Changes: No

Representations from:
Priority Space Ltd (05213)

**Rejected Housing Allocation – New Site – Land West of Ings Lane, Skellow**

3.265 KCS Developments Ltd object that the site is not allocated for housing. More land should be released from Green Belt at Carcroft/Skellow to meet shortfall. Suggests Land West of Ings Lane is suitable and deliverable and achievable (rep includes details re site and yield etc.). All site is in Flood Zone 1 (based on commissioned modelling - may differ from EA data). Only limitation of the site it that it is Green Belt. Suggest that this site is 'weak' in Green Belt protection terms. Compares Ings Lane site with allocated sites 165 & 186 in terms of Green Belt and Flood risk. Ings Lane is appropriate for residential development potentially more so than 165 & 186. Rep includes several reports and a promotion document in support of the Ings Lane site.

**Council response:** The identified site (165 / 186) can deliver enough houses to meet the requirement for the settlement on a site without flood risk constraint which was assessed in the Green Belt Review as having a moderately strong case for removal from the Green Belt. The Ings Lane site could not deliver enough units to meet the local housing need, so irrespective of Green Belt / Flood issues etc., more land would be required in the area.

Proposed Changes: No

Representations from:
KCS Developments Ltd (05319)

**Edlington**

**Supported Housing Allocation – Site Ref:646 – Broomhouse Lane, Edlington.**

3.266 Harworth Group Supports the plan as 'sound'. The site is proposed to be allocated for residential development and benefits from a live planning permission. Harworth Group as landowner are currently engaging with house builders with a view to bringing the site forward for development in 2020/21 following remediation and earthworks to allow the land to be sold as a serviced site. The delivery of this site will make the best use of previously developed land in a highly sustainable location. The site has the capacity to make a significant contribution to the supply of housing in the Borough and is essential in meeting the spatial strategy for the plan period. The allocation of this site for residential development is therefore supported.
**Council response:** Support welcomed.

Proposed Changes: No

Representations from:
Harworth Group (04916)

**Finningley**

**Rejected Housing Allocation – Site Ref:189 – Higgins Agriculture Ltd, Old Bawtry Road, Finningley**

3.267 Higgins Agriculture Ltd and Bellway Homes objet that the site is not allocated for housing. Strongly object to the current designation of the site within the Countryside Policy Area and the omission of the site from allocation to meet future short-medium term housing requirement (see policy 3). Allocation would deliver new sustainable development on part brownfield land. Site 189 is suitable, deliverable and developable for housing, and capable of being brought forward and allocated for housing within the Local Plan. Site 189 borders the Finningley development boundary and contains existing built form associated with the commercial use of the site. Substantial growth is anticipated in association with airport site, resulting in job creation and a need for housing locally supporting policy 7. Policy 7. Site ref 940 is isolated from the existing settlements surrounding the airport and would result in a residential scheme that in our view would not sympathetically integrate with the existing area is a significant distance from the centre of Auckley-Hayfield Green or Finningley and would increase car usage. Higgins site 189 is more sustainably located. The representation lists greenbelt and flood zone three housing allocations put forward to the local plan as examples and says the sites are less sequentially preferred compared to Higgins site 189. Higgin’s Site is not situated within the Green Belt and is located within Flood Zone 1. Site 189 is suitable, available and achievable for housing development (as outlined in Section 3), and that housing on the site would support the economic growth of the Airport, the distribution of housing within the Local Plan should be reviewed to accord with the National Planning Policy Framework.

**Council response:** There is no need to allocate any more land at Finningley (the location with the smallest housing requirement and the fewest services out of all the settlements identified for housing), and this site would form large urban extension to the settlement. Policy 7 / Appendix 3 and the Housing Topic Paper sets out the preferred location for potential housing at the airport and the rationale. Although there are a number of sites in the South East of the borough that are non-flood risk and not Green Belt, there is also a need to deliver a sustainable and appropriate pattern of delivery across the borough, not just focussing all housing delivery in areas which are not constrained. As set out in the Housing Topic Paper, the requirement for Finningley is 55 units, and the Site Selection Methodology
demonstrates that 50 of these can be delivered via existing commitments. There is no need to allocate any further sites in this location, and this site would result in a number of houses far in excess of what is required or justifiable in this peripheral village location which is also countryside.

Proposed Changes: No

Representations from:
Higgins Agriculture Ltd and Bellway Homes (03467)

Rejected Housing Allocation – Site Ref:315 – Land West of Station Road, Finningley

3.268 Mr K Honcherenko objects that the site is not included in the development limit for Finningley. It is suitable, deliverable and available (by DMBCs own HELAA) and is also sustainable. The site will not lead to an unsustainable built form and represents a logical limit which is tightly drawn in with the existing boundary. The site lies on the edge of Finningley and includes a dwelling with access. The site is 500m from Finningley and in Flood Zone 1. The Local Plan shows it as countryside, however it is brownfield in nature.

Council response: The site may have development on it (house), but it is largely greenfield, comprising of a garden and adjacent garden / paddock land). Such land is excluded from development limits as per the methodology, and as such has been allocated as countryside. There is no need to find additional housing land in Finningley as the local housing requirement can be met.

Proposed Changes: No

Representations from:
Mr Honcherenko (0234)

Rejected Housing Allocation – Site Reference:317 – Land East of Station Road, Finningley

3.269 Swan Homes Ltd object that the site is not allocated for housing. Finningley is shown as having a shortfall of 5 units (10%) over the plan period. Having a shortfall does not comply with the NPPF. Site 317 should be allocated to meet the requirement. Settlement profiles indicate that Finningley scores well and could support additional homes.

Council response: Although there is a shortfall of 5 units in Finningley, it is not felt that this is sufficient enough to warrant the allocation of any additional sites, the allocation of which would result in significantly more houses being delivered than necessary here.
3.270 Richard & Michelle Lewis, as owners, supports the allocation of the site for housing. However, object to view that the site will be developed in years 6 to 10. Consider development can be substantially completed within the first 5 years due to the level of pre-work that has been undertaken, and the current level of interest being expressed by building companies. Document enclosed providing additional evidence base to support the retention of the site as the preferred and allocated development site for Sprotbrough village within the Local Plan. Sprotbrough 7 Cusworth Parish Council objects to the allocation. Notwithstanding the Parish Council's objection to a failure to demonstrate exceptional circumstances to justify development into the Green Belt in the area west of the A1(M), it has considered which, if any, of the sites submitted under the Call for Sites would be the most suitable for new housing. Sprotbrough Neighbourhood Plan Group's view (endorsed by the Parish Council) is that the most obvious site that would have the least impact on the Green Belt is site ref:788. It would have the least impact on other residential areas, it on a bus route, is close to a primary school and, unlike the others, would not add to the major traffic/parking problems that already exist around the Main Street/Thorpe Lane area of Sprotbrough. However DMBC Planners decided that, in their opinion, site ref:929 Cadeby Road would be more suitable because it would have the least impact on the Green Belt and was the right size for the proposed number of houses planned, whereas the other three sites were too big and could therefore be used to build more houses in the future. David Holland also objects. The Local Plan does not meet the test of soundness and is inconsistent with National Policy. The Local Plan has disregarded the objections previously made by the consultee, Parish Council and Neighbourhood Plan group, and others. DMBC have not explained why Sprotbrough has been divided into two areas east and west of the A1 (west being the village). This is fundamental to the decision to encroach into the Green Belt as without this, there would be no need to encroach into the Green Belt. The Parish boundary incorporates land to the east and west of the A1 and should be treated equally for the purposes of community cohesion. The Neighbourhood Plan has been approved by DMBC and no suggestion has been made to divide Sprotbrough into two areas. Exceptional circumstances do not exist here to justify encroachment into the Green Belt. The housing distribution is not based on need, but on share of total housing needs based on settlement size. Separating Sprotbrough village means that housing would inevitably have to go in the Green Belt, as all the land surrounding it is Green Belt. The only reason for encroachment is the fact the village has been separated and the need is based on a share of the
overall borough housing requirement - not identified need. It is not clear if any attempt has been made to make objectively assess Sprotbrough’s housing needs. These are not exceptional circumstances, rather they arise as the result of a deliberate decision to develop the Green Belt unnecessarily, even though there are plenty of other non-Green Belt sites around Doncaster. According to the HELAA there is no shortage of suitable deliverable / developable land in the borough to meet the emerging Local Plans development needs. There is no justification to build on the Green Belt and any new housing would add substantially to the existing infrastructure problems. Also concludes that site ref:788 should be allocated instead. Mr Byran Crane also objects. The development of greenfield land in Sprotbrough cannot be justified. The site is one of the most sensitive out of those available. Local roads cannot support development of this size. Councillors Jonathan Wood & Cynthia Ransome also object. The Joint Rural Parishes request justification and clarification in respect to the removal of land from the Green Belt.

**Council response:** Support welcome. The trajectory is an estimate based on assumptions on lead in times agreed when the HELAA methodology was established. Things may come forward more quickly or slowly than projected based on a range of factors in reality. Trajectory is covered in more detail in the Housing Topic Paper. In response to the objections made, the current development plan (and indeed emerging local plan) has always differentiated between the village of Sprotbrough to the west of the A1(M) as a separate settlement to that to the east of the A1(M) which forms part of the Doncaster Main Urban Area. The 2 settlements are separated by Green Belt. As the representation notes, the only thing that has changed is that a larger range of the Villages in Doncaster are now being proposed for an allocation compared to the current Development Plan; this was subject to early consultation through the Issues & Options & Homes & Settlements stages. Disagree that were the 2 to be treated as a single settlement there would be no sites proposed in the Green Belt as Sprotbrough ‘Village’ would become part of the Doncaster Main Urban Area which is the main focus for housing growth and Green Belt allocations are being proposed at the Main Urban Area too. Sprotbrough ‘Village’ sites would have been assessed alongside all the other Main Urban Area Green Belt site options and the conclusion likely to have been the same based on the site selection methodology. Exceptional circumstances are set out in the Green Belt Topic paper and NPPF is clear that Green Belt boundaries can be changed through the preparation (or review) of a local plan. Disagree that site ref:788 is the best option in this location. The Green Belt Review shows that site ref:929 has less impact on the Green Belt, and this site can deliver the amount of houses needed in the settlement. Site ref:788 is a large linear site that is adjacent to the motorway and less well related to the settlement functionally and physically - and it would create an unusual, pincer like urban form in the settlement. The site has been identified in line with the site selection methodology. There are insufficient suitable and available brownfield sites to meet the borough’s housing requirement without the use of some greenfield sites. Sites have been modelled to look at highway impacts in terms of both the local road network and strategic road network.
Proposed Changes: No

Supporting Representations from:
Richard & Michelle Lewis (05023)

Objecting Representations from:
Sprotbrough & Cusworth Parish Council (0257)
David Holland (04543)
Mr Bryan Crane (04567)
Cllr Jonathan Wood (01404)
Cllr Cynthia Ransome (01394)
Joint Rural Parishes (04013)

Rejected Housing Allocation – Site Ref:252 – Spring Lane, Sprotbrough

3.271 Mr & Mrs Hall object that the site is not proposed for housing. It is not considered site ref:929 is the most appropriate site in Sprotbrough when considered against other reasonable alternatives as required for the Plan to be justified and sound. It is considered that site ref:252 represents a more suitable and sustainable option and should be included in the Local Plan for allocation. There appears to be over 11,600 permissions (net) which are relied on for delivery within and beyond the plan period, which equates to 63% of the housing requirement. There does not appear to be any information regarding a non-implementation allowance. A 10% discount is an approach that has been found acceptable. Furthermore, the Local Plan should identify more sites than are required to meet the housing requirement for the Plan Period to provide a buffer to account for lack of delivery from identified allocated sites and provide for choice and competition in the market. Site ref:252 is a wholly logical site for inclusion in the Local Plan. It is available, achievable and in a suitable location for delivery within the plan period. There are no insurmountable constraints to future residential development and there is a commitment to delivering / developing residential dwellings in the short term. As it stands the only real barrier to development is a settlement hierarchy (informed by a settlement audit) which can only be achieved by releasing Green Belt land and the reliance of allocating housing sites in flood risk areas. Sprotbrough is a sustainable Service Towns and Larger Village which is also very close to the Main Urban Area, yet does not receive a housing requirement proportionate to its sustainability status. The site is not in an area of high flood risk. The need to deliver housing in sustainable locations, close to the Main Urban Area, meeting the Governments aims of significantly boosting housing should not be disrupted by an inflexible settlement hierarchy approach and a Green Belt constraint. Site ref: 252 was identified as a one of 19 sites in the 'Moderate weak case for inclusion in further site selection work.' We do however have a number of concerns with the scoring of the site against some of the Green Belt Purposes, and consider that the site scoring should be reconsidered. We consider that the site actually performs better than site ref: 929,
(which is the only other identified site in Sprotbrough, and has been identified as an allocation on the basis of it being the 'least sensitive' in Green Belt terms).

**Council response:** The Green Belt Review identified that Site ref:929 had a stronger case in Green Belt terms than other sites in this location. This fed into the consideration of exceptional circumstances, which, on balance it was determined did exist in the case of ref:929, which is also a smaller site more in line with the housing requirement here. It is considered that site ref: 929 is less harmful to the Green Belt and more suitable, as well as being a smaller site. Summaries of permissions and allocations are provided in the Housing Topic Paper for clarification. As the housing figure calculation for the Local Plan has not included things such as windfalls, permissions for 1 - 4 units, defined village development, potential airport development (as per Policy 7) amongst other things, the Council effectively has created a buffer and does not feel that further allowance needs to be made for this.

Proposed Changes: No

Objecting Representations from:
Mr & Mrs S Hall (04960)

**Tickhill**

**Supported Housing Allocation – Site Ref:1028 – Sunderland Street/Sunderland Farm Close, Tickhill**

3.272 Claire & Janet Vessey support the allocation as part landowners of the site. The land is available for residential development. As owners, not aware of any constraints or covenants. Tickhill Town Council support the site allocation but conclude that the site density is too low and is an inadequate use of the land which would not lead to the size of dwellings the community needs. The site size should read 2.9ha and it should be capable of accommodating at least 100 affordable dwellings.

**Council response:** Support welcomed. The site size in the Publication version incorrectly identifies a smaller site size than the size of the allocation proposed, and as shown on the Policies Map. As the Representation points out, the correct site size is 2.9ha and this has been proposed to be corrected as a minor amendment to the plan. Site capacity of 74dph is however based on the evidence but it should be noted that Policy 6 allows for higher density schemes to come forward. Policy 8 sets out the appropriate affordable housing provision and has been subject to viability testing (in this case being 23%).

Proposed Changes: Yes – correction to site size as a minor factual amendment to reflect the size of the actual allocation proposed (2.9ha).
Supporting Representations from:
Claire & Janet Vessey (01286)
Tickhill Town Council (0213)

Rejected Housing Allocation – Site Ref:281 – Worksop Road, Tickhill

3.273 Mrs D Silk objects that the site is not allocated for housing. Policy 3 includes a target of 165 dwellings in Tickhill. This was based on a sound rationale and justification for the appropriate strategy for delivering new homes within the Borough and on a sustainable approach to delivering new homes. This would deliver homes where they were needed that would reduce use of the car and support local services and hence rural communities.

However, only one site has been found with a capacity of 74 units. Other sites were dismissed sue to access and Green Belt impacts. The shortfall of 91 is proposed elsewhere in the borough. This approach is not in line with the agreed strategy for the delivery of growth across the borough and is not sustainable in line with the NPPF (paras. 16, 59, 65 and 78). Land adjacent to the south western boundary of Tickhill (to the east of Bawtry Road) has been proposed as an allocation to meet the identified need in the settlement. The Green Belt review confirmed this was performing less well than other areas in Tickhill and could be released from the Green Belt. The site is small with good pedestrian linkages, close to bus services and in walking distance of the centre. It is suitable and available. Submissions show safe access could be provided. The Local Plan is unsound as it does not meet the identified need at Tickhill, it is not an appropriate strategy for meeting the identified housing need across the borough and it is inconsistent with national policy.

Council response: After thorough consideration, only one suitable site was found in Tickhill, which is accessible and not overly impactful on the Green Belt - thus helping the exceptional circumstances argument required to release land from the Green Belt. Sites in Tickhill are constrained by both access issues and Green Belt which makes finding suitable sites challenging. The shortfall can be met elsewhere in the borough as on balance, the harm to the Green Belt did not outweigh the need to deliver housing here.

Proposed Changes: No

Representations from:
Mrs D Silk (03525)

Rejected Housing Allocations – Site Refs: 356/357/1021 – Lindrick Lane/Wong Lane/Stud Farm, Tickhill

3.274 Sandbeck Estate object that the sites are not include as allocations. Tickhill is a Service Town / Village located within twenty minutes of a number of settlements
which provide essential services and facilities. The landowner is supportive of residential development on the sites which are available, suitable and achievable for residential development now. Tickhill has a housing requirement of 165 units and the Local Plan proposes a shortfall of 91 units which is made good through allocated supply at the Doncaster Main Urban Area and some of the Main Towns. This is unjustified and therefore unsound. Justification for this objection is based on work by landscape architects FPCR (supplied as an Appendix B). FPCR which provides a commentary on the Doncaster Green Belt Review (ARUP), and undertakes a ‘sense check’ of the published results. Site 356 would provide an urban expansion to the Service Town / Village of Tickhill. There are no known physical or technical restrictions to bringing the site forward for development (supporting information and maps provided). The site does not comply with all of the five purposes of the Green Belt as outlined at paragraph 134 of the NPPF. For example, no settlement is located within close proximity to the South of Tickhill and subsequently development at the site will not impact on neighbouring towns. Oldcotes is the next settlement South of Tickhill and is located a substantial 5.1km away. It is also considered that development at the site would not have an impact on Tickhill Castle. Unlike other sites promoted in Tickhill as part of the Call for Sites Consultation, the site can accommodate the majority or all of the proposed 154 homes over the plan period to 2032. The site is sufficiently large enough for amenity space and green areas to be incorporated into a proposed site layout design. The Sandbeck Estate welcome discussions with the Council should they want to allocate the site in its entirety or in part. The Estate also owns land south of the identified site and the Estate is also willing to discuss the potential to increase the suggested site boundary if favoured by the Council. The site has also received quite a bit of interest from volume house builders so it is considered a deliverable and viable site for future housing development. Site 357 ("Land off Wong Lane, Tickhill") should be allocated for housing. It is identified as a deliverable / developable sites in the HELAA and therefore has no physical or technical reasons as to why it could not come forward for residential development (the only constraint being that the land lies within Green Belt). Site ref: 357 would provide an urban expansion to the Service Town / Village of Tickhill. The land is under a single private ownership and whilst subject to a tenancy, the tenancy can be terminated for development purposes and therefore the development potential is available immediately. Access is available off Greystones Lane, off Wong Lane. There are no known physical or technical restrictions to bringing the site forward for development (supporting information and maps provided). A Phase 1 Desk Survey was undertaken by Solmek which concluded that the site is unlikely to have been exposed to anything other than minimal contamination, with minimal construction/demolition waste from neighbouring sites and possibly oils or fuel from vehicle spills the most likely sources local to the site. The only constraint to bringing this site forward for development in the short term is that the site is currently designated as Green Belt. Notwithstanding this, the site is considered to be a well contained site within the Service Town/Village of Tickhill. The site is sufficiently large enough for amenity spaces and green areas to be incorporated into the detailed design and layout stage. Site 1021 should be
allocated for housing. There are no constraints to bringing this site forward for
development in the short term other than it being located within the Green Belt. This
site is considered a well contained site within Tickhill capable of accommodating
future housing development to meet the objectively assessed housing need for the
Borough over the Plan period. As the site is already partly developed with existing
agricultural buildings, it is considered that the redevelopment of the site with high
quality, well designed residential properties would lead to an effective use of the
site. Whilst Tickhill Castle is located to the north (A Scheduled Monument List UID:
1004828) it is not considered that development of this site would have an adverse
impact on the Castle. Well-placed and designed development can actually act as
enhancement to a listed building.

Council response: Site Ref: 356 - The site has been assessed as having a weak
case in Green Belt terms and there are reservations about access from Lindrick Lane.
Every effort has been made to find suitable sites in Tickhill but there are a number
of constraints which hamper this. The shortfall can be made up elsewhere. The
Green Belt review carried out is independent and applies a consistent methodology.
Site Ref: 357 - The site has been assessed as having a moderately weak case in
Green Belt terms, and it is not felt suitable access can be created, given this site
would join the corner of Wong Lane (either via a new access or Wilsic Lane -
Greystone Lane is an unmade farm track), which is a ‘U’ shaped bend. Site Ref: 1021
- has a weak case in Green Belt terms for continuation in the site selection process.

It is also adjacent to Tickhill Castle and within the view of St Mary's Church in the
Tickhill conservation area. As such, site 1021 scores particularly strongly against the
historic aims of the Green Belt.

Proposed Changes: No

Objecting Representations from:
Sandbeck Estate (03568; 03569 & 04705)

Rejected Housing Allocation – Site Ref: 824 – Lumley Drive, Tickhill

3.275 Peter Kelly, Graham White, Paul Pennington & Stewart Oades object that the
site is not allocated for housing. Policy 3 identifies 165 units for Tickhill, this is not
considered to be sound and is compounded by the fact that only enough land for 74
dwellings is being allocated and the shortfall met in larger areas. There is a clear
need for local housing here and redistributing the shortfall is not appropriate. Do not
object to site 1028 being allocated but question whether it will deliver 74 dwellings
due to proximity to the A1 and attenuation measures required for noise, and
furthermore there may be air quality issues. Site 824 is considered to be an
appropriate site and could achieve well designed development which responds to the
site conditions and local characteristics. The Green Belt assessment identifies that
there are exceptional circumstances for Green Belt release across Doncaster, and
given the lack of suitable alternatives this site should be allocated.
Council response: Site 824 has been assessed in the Green Belt review as having a weak case for continuation in the site selection process, and on balance, there are not deemed to be exceptional circumstances to release this site from the Green Belt for housing. Site promotion materials have indicated that Site 1028 can deliver 74 houses and the appropriate mitigations.

Proposed Changes: No

Objecting Representations from:
Peter Kelly, Graham White, Paul Pennington & Stewart Oades (05310)

Rejected Housing Allocation – Site Ref:930 – Lindrick Lane/Worksop Road, Tickhill

3.276 Inherent Property Ltd object that the site is not allocated for housing. For Tickhill, the Plan Strategy identifies a need for 165 dwellings in the town. The Local Plan allocates sites capable of accommodating only just 74 dwellings on the basis that only a single site is suitable for development. This is not correct. The conclusions of the Site Selection eliminate the site for a single reason - that it is not possible to accommodate a suitable vehicular access to the site and that access is only possible to Lindrick Lane. This assessment is not correct. A supplied access design for the site prepared by Croft Transport Solutions shows a satisfactory access could be provided to Worksop Road. There are no access constraints that would prevent the development of the site, either in isolation or in conjunction with the adjoining site (reference 281). Nor are there any other constraints which would prevent the development of the site. A Development Statement is submitted which summarises the main technical considerations in respect of the site. There are no barriers to the site’s development. It’s allocation would help move closer to their proposed distribution of new homes - which the council acknowledge is the distribution that is best able to ensure local housing need is met and to minimise the amount of development on sites that are at risk of flooding. The Local Plan, as drafted, is therefore not sound. Firstly, the proposed spatial distribution of new homes has not been subject to a sustainability appraisal. While an SA has been carried out, it only considers the proposed distribution of new homes, not the actual distribution that the Local Plan results in. There are significant differences between the proposed and actual distributions. Secondly, the Plan does not meet the local need for housing growth that is identified as being required in Tickhill. It will not, therefore be effective in delivering the strategy it purports to be trying to deliver. Thirdly, the Plan is not justified based on the evidence. There is no evidential basis for the proposed distribution of development and that the selection of sites has not been based on the information available to the council. Nor has the Plan been arrived at from a consideration of reasonable alternatives. At no point have the council considered the spatial distribution that would result from maximising development on sites which are not at risk of flooding. Fourthly, the Plan is not
consistent with national policy. While the proposed distribution of housing growth purports to take flood risk into account, the significant deviation from the "preferred" distribution has not maximised the opportunity to deliver new homes in areas which are not at risk at flooding. To ensure soundness, the council should consider to what extent sites outside of flood zones which are not currently allocated for new homes could contribute towards housing supply. Once those sites have been identified, consideration to be given to what spatial distribution possibilities this would give rise too, and the implications for sustainability of each.

**Council response:** The Council’s highways team are of the opinion that suitable access is not achievable from Worksop Road. The site is also Green Belt, so this needs to be hung in the balance, were access issues to be overcome. As it stands, although there is a shortfall of houses in Tickhill against the target of 165, but this can be made good elsewhere in the Borough, with the overall levels of housing delivered being on target. The SA will now assess the proposed actual distribution of housing as highlighted. No allocations have been made in areas of flood risk, although permissions form part of the allocated supply. The Council has maximised opportunity to deliver homes in areas not at risk of flooding, in spite of the spatial strategy including areas at risk of flooding where these are also sustainable settlements. There has not been a significant deviation from the proposed housing distribution, most locations in the Borough can meet their housing requirements and the spatial strategy is largely maintained. There are clear reasons why Tickhill cannot meet its housing requirement as set out in the methodology, green belt topic paper and housing topic paper.

Proposed Changes: No

Objecting Representations from:
Inherent Properties Ltd (04418)

**Rejected Housing Allocation – Site Ref:1019 – Apy Hill, Tickhill**

3.277 Framecourt Homes object to the site not being allocated for housing. Concerned that insufficient housing has been identified in Tickhill, which should have 165 new homes. There is under provision at present that cannot be met elsewhere. Site 1019 can accommodate the housing need; do not agree with rejection on access grounds and consider this is part brownfield and deliverable and should be allocated as a mixed use housing and employment site. Site is available, suitable and achievable and in accordance with the framework. The site is on the edge of an established residential area and has easy access to a full range of services and facilities in Tickhill. Site is part brownfield and includes a current employment park. The new scheme would reconfigure and upgrade the current industrial estate and provide new housing alongside it. It is 3ha and could accommodate about 60 new homes plus a reconfigured enhanced employment site, plus 30 more houses on land to the south in a later phase. The site is available, suitable and achievable and
considered deliverable. It is promoted by Framecourt Homes and is therefore in accordance with the NPPF and PPG. The development can make efficient and attractive use of the land and has an excellent opportunity for future housing and development. It allows housing in an appropriate and sustainable location in Tickhill. It is in a highly sustainable location with residential development to the east and is in easy walking distance of Tickhill and its facilities as well as greater facilities within Doncaster Town Centre - a bus ride away. There are a number of primary schools in the vicinity of the site. The site is well served by buses providing opportunity for sustainable travel to Doncaster and beyond with Doncaster railway station. It will provide additional quality development to Tickhill. There is clearly a requirement for a strategic review of the locations for future growth and in order to plan appropriately in the plan period there is a need to review Green Belt boundaries. The Council have recognised this and site 1019 provides a unique opportunity to positively use the Green Belt and meet local housing needs. The site is constrained but development and activity being part brownfield / part employment and adjacent to residential properties and lying adjacent to the railway to the west. There would be limited impact on openess and redevelopment would have low impact on purposes of including land in the Green Belt. The site is contained and will not lead to encroachment or unrestricted sprawl. It is on the edge of Tickhill and contained within this setting. There would be some loss of countryside but the degree of encroachment would be minimised. There would be no impact on the historic setting. The new Green Belt boundary should be along Apy Hill Lane and the railway line to the northern boundary of the site and the well defined tree belt. The features would be clearly defined using recognisable features to ensure permanency. All boundaries could be further enforced and provide an effective transition between the development and the countryside beyond. A range of technical survey work is ongoing with the site. Initial work suggests there are no technical issues to prevent development that are insurmountable. Assessments will be submitted in due course or available on request. The site will utilise existing infrastructure and is easily accessible via the proposed access off Apy Hill Lane. The scheme makes efficient and effective use of land and infrastructure. The site can be delivered within 5 years.

**Council response:** Whilst there is an under delivery against the target of 165 at Tickhill, this is due to the lack of viable alternatives. Sites have been discounted for a number of reasons, including access issues (given the rural nature of the settlement) and Green Belt. In the case of site 1019, the site is deemed to impact too much on the Green Belt, and furthermore there are significant access issues to the site. This is expanded on in the Site Selection Methodology and Green Belt Review / Topic Paper. Overall, the shortfall is made up in other settlements. Aside from Mexborough, the Main Urban Area and all the Main Towns mentioned are only short against the top of their ranges. As the Housing Topic Paper explains, not all of these settlements need to meet the top of their range, as long as the overall number balances out at approx. 90% of housing in these two areas, which it does. In Bawtry and Sprotbrough the shortfall against the target is relatively small and in Tickhill there are no other suitable sites, aside from 1028 (where access issues can be
overcome). However, overall the borough is delivering enough housing across the plan period, and shortfalls are made up for in other areas. Note that Table HQ (2) has a lower site size that the actual size of the site, this has been amended which will address points raised about the yield.

Proposed Changes: No

Representations from:
Framecourt Homes (05176)

**Defined Villages**

3.278 There were a number of Representations objecting to non-allocation of their sites at the Defined Villages (specifically the Villages of: Hatfield-Woodhouse; Highfields; Wadworth; Arksey; Branton; Clayton; Stainton; and, Marr).

**Council response:** In line with the responses to Policy2/3 above, these are not settlements proposed for growth/allocation so are not considered as being reasonable options and have not therefore been assessed through the site selection methodology.

Proposed Changes: None

Representations from:
Persimmon Homes (Yorkshire) Ltd (03431)
Minerals Investments Ltd (03116)
Avant Homes Ltd (05210)
Harworth Group Plc (05282)
Bellway Homes (05175)
Frickley & Warmsworth estate (05312)
Sandbeck Estate (03570 & 03571)
AJ Atkinson & Sons (05284)
Zuka Ltd (04582)

**Appendices**

3.279 The Appendices attracted very few Representations, with the exception of those listed below (or referred to elsewhere in the report as part of a wider Representation).

**Appendix 1: Glossary**

3.280 United Kingdom Onshore Oil & Gas & IGas Energy Plc state that no policy or reference is made to other energy minerals, such as coal or mine methane, except for a short statement on paragraph 14.76. Policy 65 should include text on mine
methane and Coal. Glossary wording for conventional and unconventional hydrocarbons needs to be amended.

**Council response:** Amend glossary terms for conventional and unconventional hydrocarbons. Para 14.76 discusses other minerals such as peat and coal, but does not mention coal derivatives such as CBM/CMM. This can be amended to reference other energy minerals such as coal and associated by-products in to policy 65. See table of proposed modifications for policy 65 explanatory text.

Proposed Changes – Yes – amendments proposed to address Representation.

Objecting Representations from:
United Kingdom Onshore Oil & Gas (05014)
IGas Energy Plc (05129)

**Appendix 2: Developer Requirements**

3.281 Mr Turnbull notes that the site plan for allocation Site Ref:165/186 is slightly smaller than the allocated site on the Policies Map and that the two should be the same.

**Council response:** Agree, the site plan should be amended to align with the allocated site as per the Policies Map and new defensible Green Belt boundary (top north-west corner rectangle). Proposed Changes: No (but minor amendment to address Representation has been made)

Representations from:
Mr Turnbull (03259)

**Appendix 11: Noise**

3.282 United Kingdom Onshore Oil and Gas & IGas Energy Plc both comment that no provision is made for temporary uses or for short term operations, such as oil and gas exploration, appraisal and extraction.

**Council response:** The policy and appendices are not just aimed at hydrocarbon development proposals. Where required Planning and Pollution Control will work with and liaise with the EA and relevant bodies to determine applications as required by NPPF/PPG. The plan should also be read as a whole.

Proposed Changes: None

Representations from:
United Kingdom Onshore Oil and Gas (05014)
IGas Energy Plc (05129)

**Green Belt**
3.283 There were a number of comments in respect to changes (or not) to the Green Belt not include in the summaries above. Mr & Mrs Morrell support he amendment to the boundary (Site Ref:021) at Charter Drive Scawthorpe. Troy Verdion state that the Policies Map and related policies are, in part, unsound due to the inclusion of iPort within the Green Belt. Agree that the openness and prominence of the Green Belt should be protected but the Policies Map fails to do this. DMBC state that the iPort development continues to be washed over by Green Belt because this reflects the very special circumstances that supported its development, as well as the site still being a long way from completion given its sheer size. The continuation of its status of Green Belt undermines the legitimacy of Green Belt policy. DMBC have said that amending the Green Belt boundary will make no difference to the permitted scheme or its delivery. However this approach is not in line with the NPPF (para 139 e)). iPort cannot and does not contribute to the five purposes of the Green Belt. The land has already been encroached by the granting of planning permission. There are several parcels of land which abut Rossington which serve little to no purpose. iPort may wish to utilise these parcels in the future. These parcels should also be removed from the Green Belt. The site requires flexibility in the planning framework so that the scheme can be updated to respond to changing economic circumstances. Retaining it within the Green Belt limits that ability to respond. A site specific policy (plus the Green Belt boundary change) could ensure the development of the site is consistent with the planning permission.

**Council response:** Support welcome. iPort has an extant planning permission which allows the development to proceed even if is still included within the Green Belt. A Green Belt Review has already been undertaken for this Local Plan and further information on the Green Belt can be found in the Green Belt Topic Paper. The Topic Paper also acknowledges that Green Belt boundaries are likely to be reviewed at the end of the plan period.

Proposed Changes: No

Representations from:
Mr & Mrs Morrell (05171)
Troy Verdion (05177)

**Policies Map**

3.284 There were a handful of Representations in respect to the Policies Map, although these have already been addressed through the main policy section of the issues raised above e.g. request for site allocations to be included in development limits or for sites to be shown with a different boundary to that proposed.

**Sustainability Appraisal**

3.285 There were 12 Representations in respect to the Sustainability Appraisal. Representations included the need to appraise higher housing numbers and
distribution, as well as a number of challenges to how sites have been assessed through the process; claiming inaccurate and inconsistencies in approach. The Environment Agency and Historic England support the SA.

**Council response:** A summary of these Representations, as well as responses, is included in the SA Addendum published alongside the Submission version of the local plan.

Representations from:
Environment Agency (0014)
Historic England (0016)
Gladman Developments Ltd (02989)
Minerals Investments Ltd (03116)
Barratt & David Wilson Homes (04955 & 04956)
Blue Anchor Leisure Ltd (05197)
Harworth Group (05190)
A.A. Lund (05286)
Strategic Land Group (04444)
Theakston Estates Ltd (01937)

**Other Evidence Base –**

**Topic Papers**

3.286 A couple of Representations objected to there not being the full suite of Topic Papers published alongside the plan (Mr & Mrs Hall and The Strategic Land Group). The Environment Agency were satisfied with the Flood Risk Topic paper, but had some comments to make for amendments e.g. an update to their modelling timetable.

**Council response:** The majority of Topic Papers were published alongside the draft local plan. Their role is to summarise existing evidence base as opposed to introducing new evidence. The Flood Risk Topic Paper has been updated in light of all the comments received from the EA and published for the first time at Submission stage.

Representations from:
Environment Agency (0014)
The Strategic Land Group (04444)
Mr & Mrs Hall (04960)

**Colliers Employment Land Review**

3.287 Blue Anchor Leisure Ltd note that there is an addendum to the Colliers Employment Land Review (February 2018) produced as a result of the 2018 Informal Consultation. It is only a selective update and does not update the assessment of West Moor Park East in the light of the response to the 2018 Informal
Consultation. It is considered that the assessment of West Moor Park East in the Colliers Employment Land Review should not be relied upon. Agrees with Appendix 3 of the Colliers report that West Moor Park East is well located and is a potential extension to West Moor Park.

**Council response:** There is an addendum to reflect inaccuracies in the description of Site Ref:001 at Thorne North. It is not the remit of the Employment Land Review to amend SA scores.

Changes Proposed: None

Representations from:
Blue Anchor Leisure Ltd (05197)

**Infrastructure Delivery Plan**

3.288 There were 2 main Representations to the IDP. Highways England stated that the IDP is an essential document for identifying and guiding the delivery of new and improved infrastructure, including transport infrastructure, to support the plans development aspirations and will be important for Highways England in considering whether the plan is sound and based on a robust evidence base. Highways England will continue to work with DMBC to assess the cumulative impact on the SRN. Once complete, should improvements be necessary to deliver the Local Plan, these should be in the IDP with information on funding and delivery timescales. Severn Trent Water Ltd has undertaken a high-level assessment of the allocations in their catchment. They state that, for most developments, they do not foresee any particular issues. Where they consider there may be an issue they would discuss in further detail with LPA. They will complete any necessary improvements to provide additional capacity once they have sufficient confidence that a development will go ahead.

**Council response:** The Council has continued working with Highways England and has an agreed schedule of mitigation schemes included in the Submission version of the IDP.

Representations from;
Highways England (03631)
Severn Trent Water Ltd (04496)

**Publication (Regulation 19) – How were the Issues Raised Taken into Account?**

3.289 The response to Regulation 19 main issues have been summarised above with a Council response setting out whether the Representation(s) have resulted in the Council proposing Suggested Changes (See Doc Ref: CSD5). Some of the other comments, such as some of the ones raised in respect to the Sustainability Appraisal, have been addressed through an Addendum to the SA published at
Submission stage. A number of minor amendments are also proposed (such as typographical amendments – see Doc Ref: CSD6).