Examination of the Doncaster Local Plan

Council Hearing Statement

Matter 1.
Legal and Procedural Requirements
and Other General Matters

September 2020
The duty to cooperate

Q1.1. Is there any substantive evidence to demonstrate that, during the preparation of the Plan, the Council failed to undertake effective and on-going joint working with relevant bodies on strategic matters that affect other local planning authority areas?

1. No. The evidence clearly shows that the Council did undertake effective and on-going joint working. The Statement of Compliance with the Duty to Cooperate\(^1\) and Statement of Common Ground\(^2\) set out all the strategic matters associated with the Local Plan such as including housing need and location; employment need and location; local highway network; air quality and noise; flood risk; and minerals. There were four key matters where additional work and discussion was needed before and agreement was established. These were:

- The impact of proposed development on the Strategic Road Network (SoCG Agreement 7) which was collaborative working with Highways England;
- The impact of development on the Local Highway Network (SoCG Agreement 8) which was collaborative working with Barnsley Council and the Mayoral Combined Authority. This also addresses SoCG Agreement 10 regarding Air Quality and Noise;
- The impact of development on the Local Highway Network (SoCG Agreement 8) which was collaborative working with Bassetlaw District Council – this also addresses SoCG Agreement 10 regarding Air Quality and Noise; and,
- The provision of adequate aggregate minerals which was collaborative working with neighbouring authorities and Aggregate Working Parties (Agreement 19).

2. However at the time of submission, all strategic matters were fully agreed upon.

3. For each of the relevant strategic matters, the Statement of Compliance demonstrates how it was resolved or dealt with in the Statement of Common Ground. In many cases no change was required to the Local Plan or the Statement of Common Ground. There were some instances where amendments were made to the Agreements set out in the Statement of Common Ground, but these were often minor and involved revisions to wording rather than disagreements\(^3\).

4. The strategic matters were discussed at meetings involving officers of neighbouring authorities and prescribed bodies between 2015 and 2020. This included regular one to one meetings and email correspondence; mutually beneficial local plan workshops; and meetings such as Sheffield City Region Heads of Planning, South Yorkshire Local Nature Partnership Board Meetings, and Yorkshire and Humber Aggregates Working Party.

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1 CSD12 Statement of Compliance with the Duty to Cooperate
2 CSD13 Statement of Common Ground
3 CSD12 Statement of Compliance with the Duty to Cooperate section 4, pages 9-16, and section 5, pages 17-23
The Statement of Compliance also includes more detailed evidence about how the Council undertook effective and on-going joint working with its neighbouring authorities and prescribed bodies\(^4\). It lists how and when the Council consulted or engaged with each one.

5. The Statement of Common Ground was submitted with the Submission version of the Local Plan and at that time is was still out for signing by some signatories. This was because some neighbouring authorities and prescribed bodies were taking the Statement of Common Ground through their appropriate internal approval processes and many of these are lengthy. However, since that time, all of the relevant neighbouring authorities and prescribed bodies have now signed the Statement of Common Ground and this updated ‘August 2020’ version (with the only changes being the redacted signatures for those who were still seeking formal approval to sign at the point the Council submitted the Plan) included in the Examination Library as reference CSD13.1.

6. In conclusion, the Council has demonstrated that it undertook effective and on-going joint working with both neighbouring authorities and prescribed bodies.

**Public consultation and engagement**

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

7. No. The Council prepared the Statement of Community Involvement\(^5\) (SCI) as one of the first stages of the new Local Plan in line with Section 18 of the Planning & Compulsory Purchase Act 2004\(^6\). It was subject to full public consultation in Spring 2015. The consultation responses supported the SCI and a number of changes were made prior to its adoption in July 2015. It has been up-to-date in line with Section 10A of the Town & Country Planning Regulations 2012\(^7\) for the preparation of the Local Plan. Each stage of the Local Plan has been prepared in line with its requirements, and far exceeded them. The Council’s Statement of Consultation\(^8\) was prepared in accordance with Regulation 22(1)(c) of the Town & Country Planning Regulations 2012\(^9\) and demonstrates that consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant Regulations and the adopted SCI.

Q1.3. Was the Plan shaped by early, proportionate and effective engagement with communities, local organisations, businesses, infrastructure providers and operators, and statutory consultees?

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\(^{4}\) CSD12 Statement of Compliance with the Duty to Cooperate Appendix 2, pages 25-39

\(^{5}\) CSD9 Statement of Community Involvement 2015

\(^{6}\) OTH 23 Planning & Compulsory Purchase Act 2004

\(^{7}\) OTH26 Town and Country Planning (Local Development) (England) Regulations 2012

\(^{8}\) CSD10 Statement of Consultation 2020

\(^{9}\) OTH26 Town & Country Planning (Local Development) (England) Regulations 2012
8. Yes. The Statement of Consultation\textsuperscript{10} describes how the Council has undertaken community participation and stakeholder involvement in the production of the Local Plan from inception to submission. Section 3 (page 8 onwards) summarises: the main issues raised during the course of the consultation carried out under Regulations 18/19\textsuperscript{11}; how the comments received have been considered by the Council; and, how they have informed the next iteration of the Plan. For example, following Regulation 18 consultation the Local Plan (and/or its supporting evidence base) has been revised as follows:

- **Vision & Objectives** – revised to make shorter and more about our people and communities, whilst being more realistic in respect to climate change;
- **Spatial Strategy** – a new 'hybrid' option 4 was identified and taken forward;
- **Site Selection Methodology\textsuperscript{12}** – SA criteria were revised and reduced due to consultation responses from the development industry that they were too far orientated around the positive effects of reusing brownfield land and related criteria/effects. New criteria with respect to biodiversity were derived in response to Natural England. The minerals methodology was similarly updated, such as taking into account the need to consider the canal and rail network for sustainable transportation of resources;
- **Housing requirement** – the Council commissioned independent and further work (Economic Forecasting & Housing Needs Assessment 2018\textsuperscript{13}) on the appropriate housing requirement for the borough to sense check the original 2015 Housing Needs Survey\textsuperscript{14};
- **Flood risk sequential approach to more vulnerable housing uses** – consultation has identified the need for a balanced approach and only support sites that are viable and will be safe, and planning for anything more than local housing needs in flood risk areas would not be ‘sound’ – the Local Plan has struck this balance;
- **Settlement Audit** – criticism that it was too simplistic and out-of-date were responded to with an updated piece of evidence (Settlement Audit 2017 Update\textsuperscript{15});
- **Doncaster Sheffield Airport** – consultation responses in respect to the role of the Airport, in particular housing around the Airport, has been taken into account with Policy 7 and the general support the Local Plan now provides to the Airport Masterplan to 2037\textsuperscript{16};
- **Plan period** – extended from 2032 to 2035 to address consultation comments coupled with revisions to NPPF in 2018, for there to be 15 years from adoption;
- **Countryside Villages** – the need for a more flexible approach to our settlements in the non-Green Belt ‘half’ of the borough has been taken forward through Policies 2 & 3 (likewise, proposals to ‘wash over’

\textsuperscript{10} CSD10 Statement of Consultation 2020
\textsuperscript{11} OTH26 Town and Country Planning (Local Development) (England) Regulations 2012
\textsuperscript{12} SDEB46 Site Selection Methodology 2019
\textsuperscript{13} SDEB44 Economic Forecasting and Housing Needs Assessment 2018
\textsuperscript{14} SDEB23.1 Housing Needs Survey 2015
\textsuperscript{15} SDEB2.1 Settlement Audit (February 2017 Update)
\textsuperscript{16} OTH53 Doncaster Sheffield Airport Masterplan 2018-2037 Draft Consultation Report March 2018
smaller less sustainable Green Belt villages were consulted on but subsequently rejected);  
• Whole Plan Viability Testing – the evidence base from 2016\textsuperscript{17} was reviewed and updated to reflect consultation comments that it was dated and did not align with the 2018 NPPF/PPG changes and a new study published in 2019\textsuperscript{18};  
• The Providing for Energy Minerals policy was significantly revised to largely default to NPPF;  
• Allocations – a number of proposed allocations from the 2018 consultation\textsuperscript{19} have been rejected in the final Plan with others taking their place. For example, following objections to housing and the amount of Green Belt loss, the final version of the Plan proposes around 50% less housing than the 2018 consultation version. This has been achieved through utilising more urban, non-Green Belt sites in line with the revisions to NPPF in 2018.

9. The supporting Appendix/Schedule\textsuperscript{20} details precisely who on the Local Plan contacts database was directly notified at each stage of the process and shows a broad range of individuals and stakeholders, including local organisations, businesses, infrastructure providers, and statutory consultees.

**Sustainability appraisal**

Q1.4. Is there any substantive evidence to demonstrate that the sustainability appraisal failed to meet the relevant legal requirements?

10. No. Wood Environment and Infrastructure UK Ltd was commissioned by the Council to undertake a Sustainability Appraisal (SA) of the Local Plan in order to assess the environmental, social and economic effects of the Local Plan (and any reasonable alternatives), help to inform its development, and identify opportunities to improve the contribution of the Local Plan to sustainable development. The SA\textsuperscript{21} has been prepared in line with both Sections 19(5) and 39 of the Planning & Compulsory Purchase Act 2004\textsuperscript{22}, and the Environmental Assessment of Plans & Programmes Regulations 2004 (“EAPP Regulations”)\textsuperscript{23}.

11. Regulation -13(2) EAPP Regulations requires that the views of consultees (public consultees and consultation bodies) are invited on the SA Report and the Council has complied with this for each stage of the process where the SA Report has been made available for comment as set out in CSD10\textsuperscript{24}. For example, page 3 ‘Key Local Plan Stages Undertaken’ makes

\textsuperscript{17} SDEB49 Whole Plan Viability Testing 2016  
\textsuperscript{18} SDEB48.1-48.3 Whole Plan Viability Testing 2019  
\textsuperscript{19} AE04 Draft Policies & Proposed Sites Consultation 2018  
\textsuperscript{20} CSD10.2 Statement of Consultation Schedule 1 and 2 pages 1-55  
\textsuperscript{21} CSD7 & CSD7.1-CSD7.9 Sustainability Appraisal Report Addendum & Sustainability Appraisal Report 2019 & Appendices  
\textsuperscript{22} OTH 23 Planning & Compulsory Purchase Act 2004  
\textsuperscript{23} OTH30 The Environmental Assessment of Plans and Programmes Regulations 2004  
\textsuperscript{24} CSD10 Statement of Consultation 2020
clear that the SA Scoping Report\textsuperscript{25}/Interim SA Report/Final SA Report\textsuperscript{26} were consulted on at each relevant stage. Further detail is then set out in respect of each stage, for example paragraphs 3.15-3.19 (page 12) make clear that the SA was published for consultation as part of the 2015 Issues & Options stage, and paragraph 3.23 (page 16) summarises how the consultation comments were then taken into account – see response to Question 1.5 below also. The Statement of Consultation’s supporting Schedule 1\textsuperscript{27} shows in detail who was consulted on the SA Report at each stage of the Local Plan’s preparation. It is also noted that Historic England, the Environment Agency, and Natural England have all confirmed through their Regulation 19 representations that there are no outstanding issues concerning the SA Report.

**Q1.5. Did the sustainability appraisal consider and compare reasonable alternatives as the Plan evolved, including for the broad spatial distribution of housing, economic and other development? Was the Plan informed by the findings of the sustainability appraisal?**

12. Yes. SA has been an integral part of the preparation of the draft Local Plan with each stage of the Plan’s development having been accompanied by a SA, as follows:

- SA Scoping Report\textsuperscript{28} (first published in July 2015, and updated in March 2016; August 2018, and June 2019);
- Issues and Options\textsuperscript{29} (with a SA of Growth Options completed in July 2015\textsuperscript{30} and a SA of the Revised Growth Options\textsuperscript{31} completed in March 2016);
- Draft Policies and Proposed Sites Document\textsuperscript{32} (2018), Interim SA Report September 2018\textsuperscript{33} published for consultation between 13th September and 26th October 2018;
- Publication Local Plan\textsuperscript{34} (Final SA Report\textsuperscript{35} – August 2019 & subsequent Addendum\textsuperscript{36} (March 2020) published alongside submission of the Local Plan for Examination).

13. The SA of the Publication Local Plan was published in August 2019\textsuperscript{37}. The SA Report assessed the following key components of the document:

- Local Plan Vision and Objectives;

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\textsuperscript{25} AE05 Sustainability Appraisal Scoping Report – First published in July 2015 and updated in March 2016, August 2018, and June 2019
\textsuperscript{26} CSD7-7.9 Sustainability Appraisal Report – Various iterations and Interim SA Reports have been prepared being: SA of Doncaster Growth Options July 2015 with an update in March 2016; and, SA of Draft Policies & Proposed Sites June 2018
\textsuperscript{27} CSD10.2 Statement of Consultation – Schedule 1 and 2 - 2020
\textsuperscript{28} AE05 Sustainability Appraisal Scoping Report – First published in July 2015 and updated in March 2016, August 2018, and June 2019
\textsuperscript{29} AE01 Issues & Options Consultation 2015
\textsuperscript{30} AE06 Sustainability Appraisal of Doncaster’s Growth Options July 2015
\textsuperscript{31} AE07 Sustainability Appraisal of the Revised Growth Options March 2016
\textsuperscript{32} AE04 Draft Policies & Proposed Sites Consultation 2018
\textsuperscript{33} AE08 Sustainability Appraisal Interim Report September 2018 & Supporting Appendices A-R
\textsuperscript{34} CSD3 Doncaster Local Plan 2015-2035 Regulation 19 Publication Version 2019
\textsuperscript{35} CSD7.1-7.9 Sustainability Appraisal Report 2019
\textsuperscript{36} CSD7 Sustainability Appraisal Addendum March 2020
\textsuperscript{37} CSD7.1-7.9 Sustainability Appraisal Report 2019
• the quantum of growth to be provided over the plan period (development requirements) and distribution of that growth (Spatial Strategy);
• site allocations to deliver the development requirements identified in the Publication Local Plan (including reasonable alternatives); and,
• Local Plan policies including development requirements for proposed site allocations contained in the Publication Local Plan.

14. The SA Addendum\(^{38}\) report was prepared to screen, and where necessary appraise, the Council’s responses to the representations received on the Publication Local Plan in order to update the August 2019 SA Report.

15. More specifically, the SA report considered and compared reasonable alternatives as the Plan evolved, for example:

• The broad spatial distribution of housing, economic, and minerals development. Initially 6 alternative approaches to delivering the Borough’s growth needs and aspirations were considered through the SA report that accompanied the 2015 Issues & Options stage\(^{39}\).
  o Option 1: The Core Strategy approach – This option maintained the current strategy contained within the Core Strategy (the business as usual scenario);
  o Option 2: Doncaster Main Town focus – This was based on higher levels of growth in the Main Urban Area of Doncaster and Main Towns (e.g. Armthorpe, Mexborough and Thorne) with reductions in surrounding areas;
  o Option 3: Greater dispersal – This option distributed growth across a wider range of settlements such as smaller market towns and free-standing villages;
  o Option 4: New settlement or town – a much expanded or standalone settlement would provide the main focus of new housing outside of the main urban area;
  o Option 5: Low growth and environmental protection – This option was based on lower levels of growth than the current strategy and would avoid areas of Green Belt, flood risk and protected sites of historic or nature conservation interest; and,
  o Option 6: Total dispersal – This option was based on a complete dispersal of development and growth across all towns and villages.

• Options 4, 5 and 6 were rejected because of their potential to restrict long-term economic growth and prosperity and undermine efforts to regenerate and renew former mining communities contrary to the aims and objectives of the Local Plan and generally run counter to the principles of sustainable development. As such, these were not taken forward any further through the SA process as they were not considered as being ‘reasonable alternatives’.

• Following the consultation, a new hybrid ‘Option 4 – urban concentration and dispersal’ was developed and appraised in the

\(^{38}\) CSD7 Sustainability Appraisal Addendum March 2020
\(^{39}\) AE01 Doncaster Local Plan Issues & Options Consultation July 2015
Growth Options SA Report (March 2016). In this option, housing is more dispersed relative to Options 1 and 2 but more growth is directed towards the Main Urban Area and Main Towns than Option 3. The preferred approach is largely based on a combination of Options 1 and 2, with the appraisal highlighting the benefits of concentrating growth within the Main Urban Area, Main Towns and existing service centres which provide good access to infrastructure and services, such as public transport links, shops, leisure facilities and open spaces. See section 5.2 of the SA Report\(^\text{40}\) for further details in terms of how the reasonable alternatives were assessed and compared before being refined and the preferred approach taken forward (including details as to why alternatives were rejected).

- Three options were also identified in respect to how much housing and employment land should be provided over the plan period.
  - Option 1: 920 dpa and 481ha of employment land;
  - Option 2: 585 dpa and 103ha of employment land; and
  - Option 3: 753 dpa and 242ha of employment land.

- The Council rejected Options 2 and 3 because, whilst they would meet identified needs, they do not meet the Council’s aspirations for economic and social progress in the plan period. Option 2 would not enable the Council to achieve the objective of rebalancing and growing the local economy, whilst contributing to Sheffield City Region’s aspirations for economic growth. Option 3 would enable a contribution to be made to wider needs but would not provide the same scale of contribution as Option 1, nor would it provide for flexibility in relation to the provision of employment land. See section 5.3 of the SA Report\(^\text{41}\) for further details in terms of how the reasonable alternatives were assessed and compared.

- A further ‘Option 4’ was also assessed as part of an update to the SA Report and published as part of the Addendum\(^\text{42}\).
  - Option 4: 1,073 dpa and 481 ha of employment land.

- This was prepared in response to a number of representations whom suggested that there should be additional appraisals of reasonable alternatives, including the impact of making housing allocations to meet the need to 2035, and a higher housing requirement figure.

- Draft policies were appraised through section 7 of the SA Report\(^\text{43}\) with the detail set out at Appendix J. The appraisal of policies has identified that the majority are likely to have positive sustainability effects, with some potentially neutral or uncertain, particularly over the medium and longer term where it is more difficult to predict their likely effects.

- In regard to site allocations, section 8 of the SA Report\(^\text{44}\) provides a summary of the appraisal of all sites that were considered as being reasonable alternatives i.e. those capable of contributing towards

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\(^{40}\) CSD7.1 Sustainability Appraisal Report 2019 Section 5.2 page 37 onwards
\(^{41}\) CSD7.1 Sustainability Appraisal Report 2019 Section 5.5 page 51 onwards
\(^{42}\) CSD7 Sustainability Appraisal Addendum March 2020 – page 16 onwards and Appendix D
\(^{43}\) CSD7.1 Sustainability Appraisal Report 2019 Section 7 page 67 onwards and Appendix J
\(^{44}\) CSD7.1 Sustainability Appraisal Report 2019 Section 8 page 85 onwards and Appendices L-M
the spatial strategy were appraised and reasons for sites being allocated/rejected summarised within this section.

16. Specifically with respect to how the Plan was informed by the findings of the SA, a number of built in mitigation measures relating to uncertain or negative effects have been identified and incorporated in the Local Plan, which will help to ensure that the implementation of the policies is more sustainable.

17. The SA also identified a number of areas where policies could be clarified or amended to help improve their sustainability performance. These are set out in Table 7.2 of the SA Report\textsuperscript{45}. This includes earlier recommendations made by the SA on previous working drafts of the Local Plan and details where these earlier recommendations have been actioned. This reflects the iterative nature of the SA and demonstrates the influence that the SA has had on the development of the Local Plan in a transparent manner.

18. In relation to sites, as set out above, the SA has assessed reasonable options and identified both possible positive and negative effects they to be taken forward as allocations in the Plan. The SA identified a number of site options where there would be significant negative effects not possible to be addressed through mitigation (in particular in respect to built heritage) and these sites have been discounted as a result. Other sites, including ones taken forward as allocations, have mitigation which has been informed by the findings of the SA, for example the development requirements set out in Appendix 2 of the Local Plan.

\textit{Habitats Regulations Assessment}

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

19. Yes. The HRA\textsuperscript{46} does comply with the relevant legal requirements as set out in Conservation of Habitats and Species Regulations 2018 (as amended). The HRA considers whether the Local Plan is likely to have a significant effect on Thorne Moor SAC, Hatfield Moor SAC, Thorne and Hatfield Moors SPA, Lower Derwent Valley SAC, SPA and RAMSAR, River Derwent SAC and Humber Estuary SPA and RAMSAR both alone and in combination with other plans and projects. This assessment is made in light of the conservation objectives of these European Sites. In line with the April 2018 Court of the European Union ruling in the case of People over Wind, Peter Sweetman v Coillte Teroranta mitigation and avoidance measures are not considered at the screening stage of the HRA and are instead discussed fully within appropriate assessments. There is no evidence that the conclusions of the HRA report are incorrect. The report has been reviewed by Natural England at various stages of drafting the HRA and Local Plan Policies and no outstanding issues are present, as confirmed through their Regulation 19 representation which states

\textsuperscript{45} CSD7.1 Sustainability Appraisal Report 2019 Table 7.2 page 82 onwards
\textsuperscript{46} SDEB35 Habitats Regulation Assessment – Submission Version 2020
“Overall Natural England considers the Doncaster Local Plan to be legally compliant and in accordance with the relevant tests of soundness.”

**Equalities**

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

20. There are no significant effects on equalities or groups with protected characteristics that have not been identified. The Local Plan has 9 Objectives to ensure that the needs of the Borough are met and that no groups with protected characteristics may be negatively impacted by the Plan. In addition, there are 72 specific planning policies to address the needs of individuals and groups, in accordance with national planning policy requirements. The Council’s Equalities Impact Assessment and Due Regard Statement\(^{47}\) sets out and evaluates each objective, policy and characteristic type.

21. Age, as a protected characteristic, will be protected through individual policies and development proposals in the Local Plan. The assessment of policies recognises that vulnerability can change across age groups and the impact of a policy will not necessarily be uniform across all ages. The policies within the Plan are written positively to ensure that needs are appropriately assessed and addressed through individual development proposals. For example, Policy 8 (Delivering the Necessary Range of Housing – Strategic Policy) aims to make a positive contribution to the identified housing needs of the borough and will assist in developing diverse communities. It will have a positive impact on older people and those with specialist housing needs.

22. Generally, policies within the Plan are written positively with some having positive impacts on those with disabilities. Policy 46 (Housing Design Standards - Strategic Policy) ensures new houses are flexible and adaptable enough to provide a suitable living environment for people as their needs change i.e. residents living longer bringing with it health and disability issues which are associated with older age, including inclusive housing design ensuring houses are easily adaptable and capable of meeting the needs of a wide range of people including those with physical disability.

**Plan period**

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

23. Yes. The plan period was identified in line with the up-to-date Local Development Scheme\(^{48}\) and anticipates adoption of the Plan in 2020, and

\(^{47}\) CSD8 Equalities Impact Assessment and Due Regard Statement 2020

\(^{48}\) CSD14 Local Development Scheme March 2020
therefore 15 years from adoption. The Council extended the end of the plan period (from 2032 to 2035) following revisions to NPPF in 2018, and post the Council’s 2018 Draft Policies & Proposed Sites consultation\textsuperscript{49}, to align with this as well as reflect consultation responses in respect to this matter. There is also now a statutory requirement to review local plans at least every five years meaning there would be at least 3 plan reviews before the 2035 end of the plan period date in any event. Further to this, the recent publication in August 2020 of the Government’s White Paper\textsuperscript{50} is highly likely to result in a different Local Plan system being put in place within 5 years. The Council will be failing in its statutory duties therefore should the Plan not be reviewed well before the end of the current plan period.

24. Notwithstanding this and, in relation to housing land supply, there are 3 allocations in the Plan that are identified as delivering beyond the end of the plan period (i.e. 2035+) which have a combined capacity of 2,292 dwellings. Further detail is provided at section 7.11 (page 110) of the Housing Topic Paper\textsuperscript{51}. There are 3 employment allocations in the Plan which also have additional capacity post 2035 with a further 37 hectares available as set out in the Employment Land Supply Buffer Note (paragraph 2.8, page 2)\textsuperscript{52}. With respect to minerals supply, then Areas of Search are identified for both during and beyond the plan period, and there are also the Minerals Safeguarding Areas for consideration beyond the plan period.

25. Consequentially, the Local Plan’s strategic policies in relation to housing and economic development identify sufficient land to meet the needs to at least 2036, despite the plan period ending in 2035.

\textit{Monitoring}

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Q1.9. Will the approach set out in paragraphs 15.12 to 15.14 and Appendix 12 ensure that the Plan can be effectively monitored so that the extent to which its policies are being achieved will be clear? \\
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26. Yes. The schedule of Monitoring Indicators as set out in Local Plan Appendix 12 cross references the indicators against the policies and objectives of the whole Plan. It has been drawn up using a carefully considered process. It was vital that the final list of indicators provide the information to gauge the progress and effectiveness of the whole Local Plan and the success of its Policies.

27. Consideration was given to the inclusion of the most appropriate indicators. It is important that the data collected in the monitoring process is available, consistent, repeatable and reliable to enable effective analysis. Many of the indicators will be collected on an annual basis with the key findings being published in the Annual Monitoring Report which will be prepared following plan adoption and reported to the Council’s

\textsuperscript{49} AE04 Draft Policies & Proposed Sites Consultation 2018
\textsuperscript{50} OTH58 Planning for the Future White Paper August 2020
\textsuperscript{51} DMBC4 Topic Paper 4: Housing 2020
\textsuperscript{52} SDEB9 Employment Land Supply Buffer Note 2020
Overview & Scrutiny Management Committee. Repeatable time series data will enable the most robust analysis and make effective presentation of results. Data analysis will enable the Council to identify any shortfalls in progress of Local Plan objectives, the success of policies and enable a timely response to changing circumstances. This includes whether to review the Plan (or parts of the Plan) should certain policies not be achieving their intended objectives.

28. In summary, the approach set out in paragraphs 15.12 to 15.4 and Appendix 12 in the Local Plan will ensure that the Plan can be effectively monitored.

**Strategic policies and neighbourhood plans**

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<tr>
<th>Q1.10. Does the Plan set an appropriate framework, and allow an appropriate role, for neighbourhood plans having regard to current progress in their preparation in the Borough? In particular:</th>
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<tr>
<td>a) Does the Plan appropriately identify &quot;strategic policies&quot;?</td>
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29. For the avoidance of doubt, the two sub-questions of Q1.10 (parts a and b) are answered separately.

30. The Plan does appropriately identify "strategic policies".

31. Local plans are required to make explicit which policies are strategic policies having regard to national policy and guidance in the NPPF\(^{53}\) and PPG\(^{54}\). The Plan identifies 33 policies as being strategic.

32. At the highest strategic level, the Borough’s priorities for the development and use of land are set out in the Local Plan’s Vision\(^{55}\).

33. To help achieve this Vision and inform the Local Plan’s policies, the Plan also includes a series of objectives (pages 15-16 of Chapter 3). These provide more detail on the priorities. Covering 9 key areas these are the ‘hooks’ for the policies – each of the subsequent Local Plan chapters and associated policies are designed to reflect and deliver these objectives.

34. Table 3 of the PAS Local Plan Route Mapper Part 4\(^{56}\) identifies more explicitly how the policies seek to implement the Plan’s objectives.

35. 33 of the Local Plan’s policies are identified as being ‘Strategic’ and therefore as being particularly important in identifying and delivering the strategic priorities of the Local Plan. In addition, and to be read in conjunction with the Plan’s Key Diagram (Figure 4, page 44), the policies of Chapter 4 set out the higher level strategic approach to meeting the Borough’s strategic priorities. The identification of a policy as strategic for the development and use of land in Doncaster was informed by an

\(^{53}\) OTH39 National Planning Policy Framework, paragraphs 20-23
\(^{54}\) OTH41 Planning Practice Guidance, ID: 41-076-20190509
\(^{55}\) CSD3 Doncaster Local Plan Regulation 19, page 14 of Chapter 3
\(^{56}\) CDS17 PAS Local Plan Route Mapper Part 4 2020, pages 46-49)
analysis against the NPPF\textsuperscript{57} and PPG\textsuperscript{58} (as informed by Sections 19(1B and 1C) of the 2004 Planning and Compulsory Purchase Act\textsuperscript{59}) as to whether they:

- provide overarching direction / objective.
- shape broad characteristics of development.
- are of strategic scale.
- provide strategic framework for decisions / balancing competing priorities.
- are required as essential to achieving wider vision/ aspirations of the Local Plan.

36. This internal exercise was undertaken in November 2016 to inform the preparation of what resulted in the September 2018 Reg 18 ‘Draft Policies and Proposed Sites’ Consultation\textsuperscript{60}.

37. It should also be noted that the Local Plan seeks to implement the strategic priorities for the development and use of land set out in national planning policy in the NPPF (and the other national policy referred to in the introduction to the NPPF). As such the Local Plan sets out in more detail, where necessary, the local application of the NPPF’s national priorities for the development and use of land. How the Local Plan achieves this is set out in detail in PAS Local Plan Route Mapper Part 2\textsuperscript{61}.

b) To be effective, is it necessary for the Plan to be modified to include a housing requirement for each designated neighbourhood area?

38. Yes, the Council believes that it is necessary for the Plan to be modified in order for it to be effective in respect to Neighbourhood Plans and their housing requirement. The Council consider that the housing requirement for each designated neighbourhood area is zero. This is because the Local Plan identifies sufficient sites overall to meet its housing allocation requirements and does not rely on neighbourhood plans making housing allocations to meet this overall requirement.

39. Doncaster Council take a pro-active approach to Neighbourhood Plans and are frequently involved in meetings and readily available throughout the process in an advisory capacity. This includes discussing housing options with neighbourhood planning groups and setting out the Council’s housing position (existing and emerging). Whilst there is no requirement for neighbourhood plans to allocate housing sites, they are able to identify housing sites if they wish to do so.

40. The Council believes that this position needs to be made clearer to ensure consistency with NPPF paragraph 65 within the Local Plan and have suggested through our response to the Preliminary Questions (PQ6) a Main Modification to the Plan for clarity with a new paragraph 4.49 under

\textsuperscript{57} OTH39 National Planning Policy framework, paragraphs 20-23 and 28-30.
\textsuperscript{58} OTH41 Planning Practice Guidance, ID: 41-076-20190509
\textsuperscript{59} OTH23 Planning and Compulsory Purchase Act 2004
\textsuperscript{60} AE04 September 2018 Reg 18 ‘Draft Policies and Proposed Sites’ Consultation
\textsuperscript{61} CSD15 PAS Local Plan Route Mapper Part 2 2020
a new sub-heading ‘Approach to Housing & Neighbourhood Plans’ on page 35, and as part of the explanatory text to Policy 3 (Level & Distribution of Growth) – see Council’s Suggested Main Modifications (4 June 2020)⁶² for details. The modification sets out new explanatory text making clear that the Local Plan does not make specific housing requirements for individual areas due to the Local Plan itself providing sufficient sites overall to meet the housing requirement.

**Climate change**

<table>
<thead>
<tr>
<th>Q1.11. Is the Plan consistent with national planning policy relating to the mitigation of, and adaptation to, climate change?</th>
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<tbody>
<tr>
<td>41. Yes. The Council is confident that the Local Plan is consistent with national policy. This is reflected in the Climate Change Topic Paper⁶³ and the Council’s response to PQ3. The Local Plan has been prepared in line with Section 19 of the 2004 Planning and Compulsory Purchase Act⁶⁴, as amended by the 2008 Planning Act⁶⁵, to ensure that, taken as a whole, the policies in the Plan contribute to the mitigation of and adaptation to climate change. The Local Plan provides an outcome-focused duty prioritising climate change through numerous policies. The document also reflects the requirements of the NPPF and PPG.</td>
</tr>
</tbody>
</table>

42. The Climate Change Topic Paper⁶⁶ identifies the national considerations in relation to climate change and planning and identifies how the Local Plan covers in detail the requirements of the NPPF and the PPG. Table 1⁶⁷ cross references the Publication version of the Local Plan with the relevant sections in the NPPF and PPG, and identifies how the Publication Local Plan addresses the requirements. The Local Plan sets strategic priorities for the Borough and provides the policies to help achieve the vision. The Local Plan vision, and specifically objectives 17 and 18, relate directly to climate change in relation to: reducing dependency on fossil fuels; transitioning to a low carbon economy; adapting to the effects of climate change through careful design and development; avoiding flood risk areas; and, managing the residual risks of flooding. The policies throughout the Plan address: climate change mitigation and adaptation; conservation and enhancement of the natural and built environment; new development allocations (homes and employment); infrastructure; minerals; energy; historic environment; retail and town centres; design; health; community infrastructure; and, spatial proposals.

43. The Plan acknowledges the need to transform in response to technology, economy, lifestyles and climate change and recognises the need to increase climate change resilience and energy efficiency of buildings and spaces. The Plan also acknowledges the need to adapt to challenges include mitigating the effects of climate change from extreme weather

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⁶² DMBC15 Doncaster Local Plan 2015-2035: Council’s Suggested Main Modifications (4 June 2020) page 4
⁶³ DMBC1 Topic Paper 1: Climate Change and the Local Plan 2020
⁶⁴ OTH23 Planning and Compulsory Purchase Act 2004
⁶⁵ OTH54 Planning Act 2008
⁶⁶ In line with NPPF chapter 14
⁶⁷ DMBC1 Topic Paper 1: Climate Change and the Local Plan 2020 page 10 onwards
events and flooding. The overall spatial strategy aims to deliver positive sustainable economic, social and environmental development, in line with paragraph 11 and Chapter 14 of the NPPF. Growth is distributed and managed in line with the settlement hierarchy, with the emphasis on the Main Urban Area, the 7 Main Towns and 10 Service Towns and Villages. With 50% of new homes in the Main Urban Area and 40% in Main Towns the aim is to reduce travel and avoid areas of flood risk where possible. Major new employment sites will be focused in locations accessible from the Main Urban Area and Main Towns for sustainable access. Retail, leisure, office, cultural and tourist developments will be located sustainably according to a network of centres based on a Sub-Regional Centre; 2 Town Centres; 9 District Centres and a number of Local Centres and Neighbourhood Shopping Parades. This will minimise unnecessary travel.

44. Local Plan - Chapter 14 Climate Change, Minerals, Resources & Energy. The policies in Chapter 14, and the Local Plan as a whole, set out how we will ensure that:

- we address and adapt to climate change;
- we follow a risk-based approach to the location of development to avoid flood risk where possible;
- where development is necessary in areas at risk from flooding the residual risks to people and property are properly managed;
- we increase the supply of low carbon and renewable energy;
- we protect best and most versatile agricultural land; and
- we make the best use of our mineral resources.

45. Local Plan supporting chapters and policies include:

- Policy 1: Presumption in Favour of Sustainable Development (Strategic Policy) - provides for Doncaster’s strategic approach being based on a desire to deliver sustainable growth.
- Policy 4: Employment Allocations (Strategic Policy) - in particular the explanatory text (paragraph 4.55) states there is support for low carbon economy to help combat climate change. Paragraph 4.56 also says ‘sites make best use of road and rail links and other infrastructure to help stimulate business growth particularly in manufacturing, green and high-tech industries’.
- Policy 13: Strategic Transport Networks (Strategic Policy) - identifies improvements to rail infrastructure and bus transport.
- Policy 17: Cycling in Doncaster - seeks to provide for new and improved cycling routes in Doncaster.
- Policy 18: Walking in Doncaster - states walking will be promoted as a means of active travel as well as for recreation. Improvements will be sought to walking connectivity throughout the Borough.
- Chapter 10: Green Infrastructure - required for aiding resilience to climate change.
- Policy 27: Green Infrastructure (Strategic Policy) – parts A9 and 10 specifically state that major development proposals will be supported that help people and wildlife adapt to the impacts of climate change by including naturalised forms of flood storage and/or incorporating
additional tree planting within developments and provide for long term protection and climate change resilience through smart developments, management and maintenance.

- **Policy 30: Ecological Networks (Strategic Policy)** - states proposals will only be supported which deliver a net gain for biodiversity and protect, create, maintain and enhance the Borough's ecological networks.

- **Policy 31: Valuing Biodiversity and Geodiversity (Strategic Policy)** - states internationally, nationally, and locally important habitats, sites and species will be protected.

- **Policy 33: Woodlands, Trees and Hedgerows** - states proposals will be supported where it can be demonstrated that woodlands, trees and hedgerows have been adequately considered during the design process, so that a significant adverse impact upon public amenity or ecological interest has been avoided. There will be a presumption against development that results in the loss or deterioration of ancient woodland and/or veteran trees.

- **Policy 34: Landscape (Strategic Policy)** - states proposals will be supported that take account of the quality, local distinctiveness and the sensitivity to change of distinctive landscape character areas and individual landscape features, in particular Thorne and Hatfield Moors.

- **Policy 37: Listed Buildings** - part C states measures for improving the energy efficiency of a listed building will be supported if they do not conflict with its special interest as a listed building.

- **Policy 43: Good Urban Design (Strategic Policy)** – part B11 states high quality development that reflects the principles of good urban design will be supported that... reduce carbon emissions, adapt to climate change and make efficient use of natural resources during construction and operation through measures such as orientation, layout, inclusion of technology and material selection.

- **Policy 45: Residential Design (Strategic Policy)** – part B11 states new housing, extensions, alterations and changes of use to housing will be supported where... flood resistance and resilience measures with an allowance for climate change are incorporated if located in, or adjacent to, flood risk areas.

- **Policy 47: Design of Non-Residential, Commercial and Employment Developments (Strategic Policy)** - states ‘all non-residential and commercial developments, including extensions and alterations to existing properties, must be designed to be high quality, attractive, and make a positive contribution to the area and new major non-domestic applications (1000m² floor space or more, or a site of 1 hectare or above) must meet the BREEAM rating of at least ‘Very Good’, or any agreed equivalent standard, and secure at least 10% of their regulated energy from renewable sources (or equivalent carbon emission reductions)’.

- **Policy 57: Drainage** - developments will need to provide for adequate drainage and appropriately manage flood risk to existing communities.

- **Policy 58: Flood Risk Management** - all development proposals will be considered against the NPPF, including application of the sequential test.

- **Policy 59: Low Carbon and Renewable Energy (Strategic Policy)** - states we aim to increase the supply of low carbon and renewable
energy, which is essential to meet commitments to reducing carbon emissions and combatting the effects of climate change.

- Policy 60: Wind Energy Developments (Strategic Policy) - seeks to provide appropriate locations for renewable wind energy.
- Policy 61: Protecting and Enhancing Doncaster’s Soil and Water Resources - the policy protects the best and most versatile agricultural land and ensures developments should not impact on water quality or harm aquifers and identifies the need for flood storage.
- Policy 64: Reclamation of Mineral Sites - ensures that mineral extraction sites in biodiversity opportunity areas will direct reclamation towards the UK Biodiversity Action Plan priority habitats indicated in Policy 30 as a priority for that area.

46. As can be seen from the response above, the Local Plan contains a robust suite of policies covering the wide variety of issues relating to climate change. Overall, the Council believes the Local Plan has a balanced approach to sustainable development and with respect to climate change.

**Flood risk**

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

47. Yes. The Council considers that both the spatial strategy and subsequent site allocations were chosen in accordance with both NPPF Chapter 14 and PPG. PPG\textsuperscript{68} sets out a diagram in respect to taking flood risk into account in the preparation of local plans. Appendix 1.12a of this Hearing Statement replicates that diagram with the Council’s approach also summarised alongside the respective stages in a tabular format.

48. As set out in the attached Appendix 1.12a, there are a number of planning permissions in FZ2/3 that can be included in the Borough’s land supply. Housing sites with detailed planning permission (and non-major development) are, by the NPPF’s definition, deliverable so long as there is no clear evidence to the contrary. Some Outline permissioned sites are also included towards the supply where there is clear evidence that they are deliverable and achievable, such as Unity (see Policy 70 of the Local Plan). These sites will be safe in line with the mitigation measures as per their Flood Risk Assessments. In terms of ‘new allocations’ (Employment Sites – Policy 5 & Table 4 and Housing Sites – Policy 6 and Tables H2(A-Q)) any which are wholly or partly in FZ2/3 are set out in the summary table at Appendix 1.12b of this Hearing Statement, including whether the exception test is required. The table also summarises how parts (a) and (b) of NPPF paragraph 160 have been met (i.e. that the exception test has been passed) where identified as being required.

\textsuperscript{68} ID: 7-004-20140306
49. The Council’s Flood Risk Topic Paper also sets out a summary of how flood risk, including the evidence, has informed the preparation and decisions taken in the Local Plan. In particular: section 3 (page 11 onwards) provides an overview of the Council’s evidence base and limitations in respect to the EA modelling; section 4 sets out the approach to the spatial strategy and the Local Plan in respect to housing; section 5 does the same but for employment; and, section 8 covers actual sites for both land uses. The latter being a brief summary of the Site Selection Methodology (see Stage 5 - pages 94 onwards) and the Sustainability Appraisal (summarised in Stage 4 of the Site Selection Methodology – pages 25 onwards) where the sequential and exception tests are set out in detail.

50. With regards to the flood risk evidence base available for the preparation of, and to inform this Local Plan, paragraph 156 of NPPF requires strategic policies to be informed by a strategic flood risk assessment, but there is no specific requirement in the Framework for whether this is a Level 1 or Level 2 assessment.

51. A Level 1 SFRA must be detailed enough to allow application of the sequential test to the location of development and to identify whether development can be allocated outside of high and medium flood risk areas (based on all sources of flooding). It is the Council’s view that the evidence base that has informed the Plan is sufficiently detailed to have allowed such an approach to be carried out and inform such decisions.

52. Importantly, paragraph 156 of the Framework also goes on to make clear that plan-making authorities should take advice from the Environment Agency. As such, where the Environment Agency considers that the flood risk information supporting the Local Plan is sufficient then that view must carry considerable weight. Agreement 12 in the Statement of Common Ground reads as follows: “Doncaster Council will continue to liaise with the Environment Agency and neighbouring authorities where necessary. Hydraulic Modelling evidence will be kept under review and an update to the Level 1 Strategic Flood Assessment will be considered and then a more detailed level 2 Assessment may follow on.”

53. The preceding paragraph confirms that “there has been regular on-going consultation and engagement with the Environment Agency. This has resulted in their involvement throughout the evolution of the Local Plan as their comments and suggestions have been considered and incorporated in to the policies and the Flood Risk Topic Paper. This joint working has ensured that the Local Plan complies with national guidance regarding flooding and has guided where development can take place but also has regard to the regeneration needs of the borough”. On the basis that this reflects the agreed position between the Environment Agency and the Council, it is reasonable to expect the Environment Agency to have a clear

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69 DMBC2: Topic Paper 2: Flood Risk 2020
70 SDEB46 Site Selection Methodology 2019
71 CSD7.1 Sustainability Appraisal Report 2019
72 SDEB13 Strategic Flood Risk Assessment Level 1 2015
73 CSD13 Statement of Common Ground March 2020 page 32
opinion about whether the Council’s approach is consistent with national guidance. Indeed, if the Environment Agency considered that the Local Plan was non-compliant, the close working between the parties would have revealed this.

**Viability evidence to inform the Plan**

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

54. Yes, the evidence is proportionate and up-to-date in terms of NPPF paragraph 34 and the revised PPG in 2018 in respect to viability and plan-making. The Whole Plan Viability Testing evidence base was initially prepared in 2016\(^74\) but, given the passage of time since then, coupled with the changes to viability and plan-making through 2018 NPPF and PPG, the evidence was revisited in 2019\(^75\). The need to update the evidence was also identified by the 2018 consultation\(^76\) responses. Both studies included stakeholder involvement before deriving at the appropriate assumptions to feed into the appraisals as supported by PPG\(^77\). In line with the PPG\(^78\), it was appropriate to undertake base appraisals (i.e. with initial assumptions) and then undertake sensitivity analysis where key assumptions were adjusted in the modelling and the appraisals re-run. This was to provide a broader view on viability (recognising the approach can never be entirely robust). The results of the base appraisals and sensitivity analysis were then considered holistically before conclusions were reached. For the testing, the PPG recognises that not every site likely to come forward during the period of the Plan can be appraised, this is not considered to be practical. Site typologies are therefore recommended, which reflect the likely scale of schemes coming forward. This was then supplemented with some sample site assessments of actual proposed allocation sites.

55. The Council considers that the policy requirements are set at an appropriate level having assessed the cumulative cost of all relevant policies and are confident therefore that they are not set at such a level that they will undermine deliverability of the Plan as required by NPPF (paragraph 34). As part of the study, draft policies were reviewed for cost implications and the findings of the study has resulted in redrafting of Local Plan policies. In particular, the study found that it was the affordable housing component of schemes where the biggest impacts on development viability were found. The affordable housing requirement of Policy 8, and the variable rates approach that is being taken forward, is a viability-evidence led policy approach and is in line with NPPF paragraph 34 and PPG.

\(^{74}\) SDEB49 Whole Plan Viability Testing 2016  
\(^{75}\) SDEB48.1-48.3 Whole Plan Viability Testing 2019 & Appendices 1-15  
\(^{76}\) AE04 Draft Policies & Proposed Sites Consultation 2018  
\(^{77}\) ID: 10-002-20190509  
\(^{78}\) ID: 10-003-20180724
56. The majority of the proposed dwellings (15,255 units) are either within the higher value area (based on the affordable housing value map to aid application of Policy 8 and found at Appendix 5 of the Local Plan), or have existing planning permissions. Collectively this equates to around 96% of the total planned dwellings identified in the Local Plan. Although the ‘high value area’ referred to by Policy 8 is the combined ‘medium and high value’ areas from the Viability Study (Appendix 1), the evidence shows there are no viability issues for the high value areas, and 5 out of the 7 medium value typologies were also shown to be viable with the full suite of planning policies applied. The 2 typologies where viability was identified as being an issue within the medium value areas were only in relation to Brownfield occupied urban sites. The half dozen allocations in the Plan that fall into this site typology, and are not yet permissioned, are typically small sites that are owned by the Council. As landowner, the Council can (and does) dispose of its assets motivated by a range of objectives that are not always driven by maximising capital receipts and expecting returns and land values akin to the assumptions that have fed into the viability evidence base. The largest site (Barton Lane, Armthorpe) is an allocation made through the Armthorpe Neighbourhood Plan\(^79\) (ANP3) where the Council has not replicated the site selection process, and has taken the allocations from the ‘made’ Neighbourhood Plan instead. It should also be noted that the northern part of the allocation is permissioned for housing also.

57. For the remaining 4% of the supply (9 sites totalling 653 dwellings) found in the ‘low’ value areas on non-permissioned sites at April 2018, 3 sites have now progressed to Planning, with some now having consent (141 units). A further 4 (253 units) are on sites owned by the Council, including ones that are part of the Housing Revenue Account (see response above in respect to how the Council can dispose of its land assets). The remaining 2 sites are at Askern (Site Ref: 041 – Askern Industrial Estate) where allocations far surpass the settlement’s target already, and at Conisbrough (Site Ref: 040 – Sheffield Road) where the site promoter (Ref: 03008) has confirmed through their representation that the site is suitable, available, and achievable. They also state that an indicative capacity of 234 units (+34 dwellings) should be identified in the Plan for the site. A higher density scheme, if appropriate, would also assist with development viability as proven through the sensitivity testing of the viability study. Policy 6 (Housing Allocations) would support a higher density scheme on allocated sites where it would result in a better design solution.

**Developer contributions and viability assessments at planning application stage**

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

\(^79\) OTH10 Armthorpe Neighbourhood Plan 2018
58. The policy is consistent with NPPF, in particular paragraphs 34 and 56, as well as PPG\(^{80}\) as to when planning obligations should not be sought. The policy uses the same wording as per the 3 statutory/policy tests as set out by Regulation 122 of the Community Infrastructure Levy Regulations 2010\(^{81}\) and NPPF paragraph 56.

59. The PPG is clear that obligations for affordable housing should only be sought for major development (10+ dwellings, or 0.5ha in size). Policy 8 sets a threshold of 15+ dwellings, or 0.5ha in size, and is a ‘tried and tested’ threshold currently used by the Core Strategy\(^{82}\) (2012). Although PPG would support the lowering of Policy 8’s threshold to 10 dwellings, none of the allocations in the Plan without permission fall into the category of 10-14 units so there would be no difference in the application of the policy to allocations in the Plan. The exception being a single site of 13 units, but the site size is 0.5ha (0.49ha rounded up) so would be required to provide its respective affordable housing contribution by the policy as drafted.

60. Further to this, the PPG 10+ unit threshold was introduced following the Written Ministerial Statement (WMS)\(^{83}\) in respect to supporting small-scale developers, custom and self-builders. The Government was clear in the WMS of the need to reduce the disproportionate burden from the costs of developer contributions to smaller developers. To enable this, it is clear that schemes up to 9 units should not be expected to provide affordable housing contributions (unless justified as being a rural area). By lowering the construction cost of small-scale developments the WMS is clear that it will lead to increases in housing supply, encourage brownfield sites to come forward, and help diversify the house-building sector through boosting small and medium-sized developers. The Council’s 15+ unit affordable housing threshold therefore not only accords with the WMS/PPG, but setting the threshold at a slightly higher level of 15+ units will also help deliver the Government’s clear objectives of bringing forward more homes on brownfield sites from smaller developers for any windfall applications over the plan period. The Borough is not a designated rural borough, so NPPF paragraph 63 in respect to policies setting a lower threshold for affordable housing does not apply.

61. The Council’s suggested change, to include text in the policy relating to pooled contributions, is considered justified and necessary as per the representation from Highways England (Ref: 03631). The change is required to align the policy with section 11 of the Community Infrastructure Levy (Amendment) (England) (No2) Regulations 2019\(^{84}\) which removed the pooling restriction and came into effect from 1\(^{st}\) September 2019 after the Local Plan was published for Regulation 19 stage (July 2019).

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\(^{80}\) ID: 23b-023-20190901  
\(^{81}\) OTH55 The Community Infrastructure Levy Regulations 2010  
\(^{82}\) OTH3 Adopted Core Strategy Development Plan Document 2012  
\(^{83}\) OTH60 House of Commons: Written Statement (HCWS50) Support for small scale developers, custom and self-builders – 28\(^{th}\) November 2014  
\(^{84}\) OTH56 Community Infrastructure Levy (Amendment) (England) (No2) Regulations 2019
Q1.15. Is policy 67 consistent with national policy and guidance relating to the use of viability assessments at the planning application stage?

62. Yes. NPPF paragraph 57 is clear that policies in up-to-date plans which set out contributions expected from development are assumed to be viable. The onus is on the applicant to demonstrate whether there are circumstances that have arisen that justify the need for a viability appraisal as part of the decision-making stage. The PPG\textsuperscript{85} reiterates this position and then goes on to state “such circumstances could include” which supports that there will be instances where an appraisal is appropriate at planning application stage so it is the Council’s view that Policy 67 is consistent with both NPPF and the PPG. Furthermore, it is noted that the wording above from PPG does not limit the reasons why a planning application stage viability assessment could be deemed appropriate, so only provides examples, not a definitive list. Viability appraisals at planning application stage will also be in exception rather than the norm.

63. A number of the representations have objected to part B of the policy that states that where lower levels of contribution have been agreed in the interests of development viability, the scheme may be subject to reassessment at a latter stage to review whether contributions could then be viable. The Council has been following such an approach for a number of years, particularly following the impacts of the 2008 recession, in the interests of bringing forward development, whilst following best practice as well to ensure important contributions to our communities are not unnecessarily negotiated away. The need for such a policy is particularly so for very large development sites that will be developing out for many years during which time the economic cycle may change. This approach is clearly supported by the PPG which states there should be a clear agreement on how policy compliance can be achieved over the longer term where it has been necessary to reduce contributions.

\textsuperscript{85} ID: 10-007-20190509
### Appendix 1.12a: Local Plan Approach to Flood Risk

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<thead>
<tr>
<th>Stage</th>
<th>Council’s summary of approach</th>
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| **Stage 1 – LPA undertakes a Level 1 SFRA** | - The Level 1 SFRA\(^\text{86}\) was undertaken by specialist consultants (JBA) and published in 2015;  
- This evidence base was prepared in conjunction with the EA and colleagues in the Council’s Lead Local Flood Authority, and included consultation with the appropriate bodies, such as utilities companies and Canal & Rivers Trust, as part of its preparation;  
- The SFRA also assessed site options in respect to the sequential, risk based approach to location of development. |
| **Stage 2 – The authority uses the SFRA to: (i) inform the scope of the SA for consultation; and, (ii) identify where development can be located in areas with a low probability of flooding.** | - The borough’s flood risk constraints have been considered throughout all iterations of the SA\(^\text{87}\), including the original Scoping Report which identified that over 30% of the borough was FZ3 and a further 9% FZ2 equating to over 24,000 hectares of land and including large parts of the Doncaster Main Urban Area, Thorne-Moorends, Hatfield-Stainforth, Carcroft-Skellow and Askern. The potential for other sources of flood risk, such as surface water, are also identified in the SA, with potentially high risk areas being found in parts of the Main Urban Area and Adwick-le-Street;  
- Almost the entire of the M18 Motorway (Junctions 3-6) are also in FZ3;  
- The SA identified that one of the key issues for the borough is balancing regeneration and place-making aspirations against the residual risks from flooding. It goes on to say that a sequential risk based approach to the location of development in the local plan will be required to steer development away from flood risk areas where possible, and consistent with wider sustainability and planning objectives, as well as attempting to manage and reduce flood risk overall. It concluded that policies would be required to manage and mitigate flood risk;  
- The SA Scoping Report was published for full public consultation in July 2015 and has been kept up-to-date since then with periodic updates; |
| **Stage 3 – The authority assesses alternative development options using the SA, considering flood risk (including potential impact of development on surface water run-off) and other planning objectives.** | - In line with the guidance, the Level 1 SFRA looked at all sources of flood risk, including surface water flooding;  
- Subsequent SA Reports appraised various reasonable growth options which included appraisal of the approach in respect to flood risk. For example, the first SA of the Issues & Options (summer 2015) identified that all 3 options performed the same against the flood risk criteria with possible positive and significant negative effects (+/-) expected. All of the options were seen to perform positively through helping to combat the need to travel by non-sustainable modes via directing development to our most sustainable settlements with a good range of services and facilities; thus helping to reduce carbon emissions and the effects of climate change which is |

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\(^{86}\) SBEB13 Strategic Flood Risk Assessment Level 1 2015  
\(^{87}\) CSD7.1 Sustainability Appraisal Report 2019
likely to lead to increased flooding in the future. However, there were potential significant negative effects which reflected the significant constraints that the borough has in terms of flood risk to some of its largest towns and settlements where virtually any future growth would require land at risk of flooding, such as Thorne-Moorends;
- It concluded that actual effects would however require further detail around site availability;
- The SA report published alongside the Homes & Settlemets stage (March 2016) assessed the impacts of flood risk from the proposed ‘hybrid option’ and this predicted the same potential effects as per the original 3 reasonable strategic options (+/-).

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<th>Stage 4 - Can sustainable development be achieved through new development located entirely within areas with a low probability of flooding?</th>
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| • The SA of the growth options identified that all reasonable options identified would potentially have negative effects in respect to flood risk due to the presence of flood risk, particularly main river flooding based on the EA Flood Map for Planning, in the north-east of the borough where some of the largest settlements (as well as the M18 corridor) are located;
• Although theoretically possible therefore that new development could be located entirely within areas of low probability of flooding, there would be several large urban areas where complete avoidance would not achieve wider planning objectives (for example, regeneration, meeting local housing need, locational needs of employment sites and proximity to strategic road network, efficient use of land, re-use of brownfield sites, delivery of affordable housing etc). |

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<tr>
<th>Stage 5* - If ‘no’ - Use the SFRA to apply the Sequential Test (Diagram 2) and identify appropriate allocation sites and development. If the Exception Test (see Diagram 3) needs to be applied, consider the need for a Level 2 SFRA.</th>
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| • Sites were initially assessed in respect to flood risk as part of the Level 1 SFRA. Due to the time lag between this evidence being published, and a significant number of new site representations received after the initial ‘call for sites’, as well as a new Flood Map for Planning being published by the EA, the Council replicated the site assessment using GIS and based on the most up-to-date data available as part of the SA of sites and this was also set out in the Site Selection Methodology⁸⁸;  
• The approach is considered consistent with that set out in diagram 2 of the PPG⁹⁹;  
• Sites which contained 80% or more of their boundary in FZ1 were identified as scoring ‘positive effects’ through the SA (criteria 11a);  
• Additional criteria assessed surface water flooding and sites not identified as being at risk also scored positively (criteria 11b);  
• Additional criteria in respect to whether the site was in an area already benefiting from defences (criteria 11c), and in an EA Flood Warning or Alert area (criteria 11d) were also used;  
• Deliverable/developable planning permissions have been excluded from the test as their capacity has been taken as the starting point for contributing towards a settlement’s housing target. They have been through the Development Management process, including sequential and exception |

⁸⁸ SDEB46 Site Selection Methodology 2019  
⁹⁹ ID:7-021-20140306
tests (where required), in line with the Council’s adopted Core Strategy\textsuperscript{90} Policy CS4 and supporting SPD\textsuperscript{91} and in consultation with the EA and other water management bodies. They have agreed mitigation in line site specific FRA’s;
- Remaining site options were tested at settlement level for housing (and borough-wide for employment) and all sites that scored positively for both main river flooding and surface water flooding passed the ‘first sift’ of the sequential test (see stage 5\textsuperscript{92});
- Sites that scored neutral (FZ2) and negative (FZ3a) or significant negative (FZ3b) for main river flooding or negative (medium/high risk) for surface water flooding failed the first sift of the sequential test and fell out of the site assessment (stage 5) at this point and were only to be revisited through a ‘second sift’ of the test if insufficient sites were identified for a settlement’s target (or for the borough’s employment land requirement) at the end of the methodology (stage 7);
- The Council commissioned JBA to prepare a Level 2 SFRA after adoption of the Level 1 Assessment. However, it became apparent someway into the brief that, there was a lack of detailed hydraulic modelling by the EA available at this time which would provide the necessary detail on residual risks (velocity, inundation rates, depths etc) to fully be able to apply the exception test for ‘more vulnerable’ housing sites;
- In line with NPPF paragraph 156, the Council sought advice from the Environment Agency. They were clear that it was not possible for the Council to prepare an NPPF compliant Level 2 SFRA for the time being until their modelling had been completed;
- The Local Plan acknowledges this limitation (paragraph 1.11 bullet point 6) in the evidence for this plan, and Policy 58 Part D commits the Council to keeping its flood risk evidence base up-to-date, including commissioning a Level 2 SFRA in due course;
- NPPF para 159, supported by the detail provided in PPG\textsuperscript{93}, are clear that employment sites (offices, general industry, storage and distribution) are classed as ‘less vulnerable’ uses and do not require the exception test. PPG\textsuperscript{94} is also clear that Level 2 SFRAs may be required to inform the exception test (not the sequential test);
- NPPF para 160 is also clear that, at plan-making stage, the exception test should be informed by a SFRA and not site specific flood risk assessments;
- Not having a Level 2 SFRA does not cause an issue in terms of compliance with national flood risk policy and bringing forward ‘less vulnerable’ employment allocations in FZ3 so long as the

\textsuperscript{90} OTH3 Adopted Core Strategy Development Plan Document 2012
\textsuperscript{91} OTH7 Development & Flood Risk SPD 2010
\textsuperscript{92} SDEB46 Site Selection Methodology 2019
\textsuperscript{93} ID: 7-066-20140306 & ID: 7-067-20140306
\textsuperscript{94} ID: 7-012-20140306
Stage 6 – Assess alternative development options using SA, balancing flood risk against other planning objectives.

- The more detailed appraisal of potential sites for housing identified that:
  - 175 sites equating to 49,941 dwellings passed the 'first sift' of the sequential test;
  - 97 sites equating to 12,372 dwellings failed the test;
  - Most settlements in the growth hierarchy had a significant supply compared to their indicative target allocations of Policy 3;
  - However, all of the sites at Barnby Dun (Service Village) failed the ‘first sift’ and the majority of the sites at the Main Town of Thorne-Moorends also failed the ‘first sift’ with just 3 sites equating to 64 dwellings identified in FZ1;
  - All of the sites at the 4 Service Towns/Villages of: Barnburgh-Harlington; Edlington; Sprotbrough; and, Tickhill passed the test.
- Stage 7 of the Site Selection Methodology identified that Thorne-Moorends only had enough housing sites to meet the bottom of the growth range with no contribution towards the economic-growth led housing element of need. There has been a significant level of objection through the process that, as one of the largest Towns in the borough, further housing should be identified, including from the Town Council and their appointed Neighbourhood Plan Steering Group. This warranted a second review of the sites that had failed the ‘first sift’ of the sequential test. 3 additional sites have been allocated.
- As eluded to above, there were no allocations at Barnby Dun due to flood risk. The second review identified that it was possible to allocate a single site to more or less meet the Village’s target.
- In respect to employment sites:
  - 31 sites with a combined gross site area of 1,365ha failed the ‘first sift’ of the test;
  - 23 sites, equating to 739ha (gross) passed the ‘first sift’.
- Not all of the sites equating to 739ha are allocated as Employment sites. Those that are, are within the Main Urban Area or Rossington;
- The employment strategy is based on market attractive locations where there is strong accessibility and connectivity. Market analysis has shown that the market attractive locations are in the M18 corridor (within the Countryside) where there are no capacity constraints (unlike the A1(M) corridor (CSD395)). A large amount of the 739ha does not meet with the M18 strategy and is therefore not allocated;
- In addition to the above, there are additional reasons as to why some sites in the 739ha are not allocated for employment. For example, some have been taken forward as housing allocations in the Local Plan and a number are included in Policy 69: Key Doncaster Town Centre and Main

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95 CSD3 Doncaster Local Plan 2015-2035 Regulation 19 Publication Version June 2019
Urban Area Mixed-Use Sites such as St Sepulchre Gate West and the Civic and Cultural Quarter as they are included in the Urban Centre Masterplan. Some would have resulted in an over allocation of employment land in an area (some sites at the airport).
- A number of sites are within the Green Belt and there are no exceptional circumstances for allocating these sites for employment.

Stage 7 – Use the SA to inform the allocation of land in accordance with the Sequential Test. Include a policy on flood risk considerations and guidance for each site allocation. Where appropriate, allocate land to be used or flood risk management purposes.
- The findings from the SA were used inform allocations as part of a wider site selection methodology and stages which included HELAA, Green Belt, and Viability evidence and considerations;
- Policy 58: Flood Risk Management sets out expectations for flood risk management and mitigation for both allocations and windfall sites, including sequential testing;
- Explanatory text to Policy 58 at para. 14.7 also ensures any ‘more vulnerable’ potential uses on employment/mixed-use sites (sequentially tested as ‘less vulnerable’ uses at plan-making stage) will still require successful pass of sequential test as part of any subsequent planning application;
- Appendix 2: Developer Requirements is clear that there should be no ‘more vulnerable’ built development in the parts of the two housing allocations (Refs: 147 & 396) that have a small part of the site boundary in FZ3, but that water compatible uses (GI, open space, landscaping etc) are appropriate;
- The Level 1 SFRA identified the detailed boundaries and extent of the functional flood plain (FZ3b) as designated on the local plan Policies Map and Policy 58: Flood Risk Management where national policy will be applied.

Stage 8 – Include the results of the application of the Sequential Test (and Exception Test where appropriate) in the SA Report. Use flood risk indicators and Core Output Indicators to measure the Plan’s success.
- The SA Report has continued to incorporate the findings in respect to flood risk, including specific sites and settlement-level findings, for example the 2018 SA published alongside the Draft Policies & Proposed Sites consultation as well as the Publication version of the SA;
- Monitoring Indicators are set out at Appendix 12 to measure the plan’s success;
- Specifically in relation to flood risk and Policy 58:
  - No of planning applications granted with a sustained EA objection; and,
  - No of planning applications granted in FZ2/3.

* If ‘yes’ then skip to stage 7

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96 DMBC3 Topic Paper 3: Green Belt 2020
97 CSD4 Doncaster Local Plan 2015-2035 Regulation 19 Publication version 2019
## Appendix 1.12b: Flood Risk Allocations

<table>
<thead>
<tr>
<th>Site Ref</th>
<th>Site Name</th>
<th>Settlement Hierarchy</th>
<th>Settlement Name</th>
<th>Land Use</th>
<th>FZ(%)</th>
<th>Sequential Test</th>
<th>Exception Test Required?</th>
<th>Planning Status/Application Reference</th>
<th>Part a) Wider Sustainability Benefits</th>
<th>Part b) Safe for lifetime &amp; not increase flood risk elsewhere</th>
<th>Reduce flood risk overall</th>
</tr>
</thead>
</table>
| 001      | J6 M18, Thorne North | n/a – borough wide   | n/a – borough wide | Employment (B1/B2/B8) | 3 (99%) 1 (1%) | \* Scores similarly to other sites in the Sustainability Appraisal process.  
\* It is a deliverable site which will provide job opportunities in the north of the borough.  
\* It will complement other successful, existing employment sites to the north of Thorne.  
\* The site has some support from the community of Thorne | No – less vulnerable uses | | | | | |
| 441      | Carcroft Common    | n/a – borough wide   | n/a – borough wide | Employment (B1/B2/B8) | 3 (100%) | \* Reserve employment site in the UDP so is not within the Green Belt.  
\* It is in the north of the borough where there are high levels of deprivation so jobs in this location will be beneficial to the community.  
\* Site helps to re-address the balance of private sector investment which has taken place in the south of the borough.  
\* Site will also benefit from the development of the Trans-Pennine Link Road. | No – less vulnerable uses | | | | |
| 1032     | Bankwood Lane, Rossington | n/a – borough wide | n/a – borough wide | Employment (B1/B2/B8) | 1 (82%) 2 (11%) | \* Site within existing well used successful | No – less vulnerable uses | | | | |
| 255 | Hungerhill, Edenthorpe | Doncaster Main Urban Area | Doncaster Main Urban Area | Residential | 3 (8%) employment area in a Main Town | 1 (1%) Site granted planning permission (post 1st April 2018) and sequentially tested as part of the Development Management process. | Yes – more vulnerable – see table below | Outline Permission granted May 2019 18/02592/3OUTM | The site provides a significant contribution to the main urban area's housing supply on an urban site that performs well through the SA process with mostly significant positive, positive and neutral effects across the criteria. | There are no historical records of any flooding within the site. | Based on the latest breach analysis for the River Don, the 1 in 100-year breach flood level is 8.61m AOD. | An analysis of how this would affect the site has confirmed that due to the existing topography between the breach point and the site, the floodwaters would only reach the northern part of the site and retained within the section of Barnby Dun Road under the railway bridge crossing. No floodwaters would enter the site itself. | Development is to be in accordance with the FRA (White Young Green (September 2018)). | There are EA embankments along the nearby stretch of the River Don which provide a 1 in 100-year standard of protection. | Development is to be in accordance with the FRA (White Young Green (September 2018)). | Dodge Dyke is to be re-aligned where it traverses the site in order to provide a more curved route and to remove the two existing 90-degree bends, which result in localised sedimentation. |

- The finished floor levels will be set 600mm above the 1 in 100 annual exceedance probability plus climate change flood level of 9.154m AOD. Where ground levels are above this then finished floor levels will be set 150mm above the surrounding levels. Where setting finished floor levels at 9.754m AOD is unrealistic (such as in the lower areas of the site), then either finished floor levels will be set with a 600mm freeboard above final ground levels or they will be set with a 300mm freeboard and flood resilience measures provided for a further 600mm.

- Based on the review of the British Geological Survey database and other local geological reports it is likely that the use of infiltration techniques will be viable within the site. Surface water could be discharged through infiltration SuDS techniques with an emphasis on above ground options where possible. Alternatively, surface water runoff could be discharged to Dodge Dyke with on site attenuation.
<table>
<thead>
<tr>
<th>Reference</th>
<th>Location</th>
<th>Parish</th>
<th>Use</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>247</td>
<td>Rossington Colliery</td>
<td>Main Town</td>
<td>Residential</td>
<td>Site passed sequential test as less than 20% of boundary was in FZ2.  No - more vulnerable uses but FZ2 so not required (only a small area)</td>
</tr>
<tr>
<td>081/343</td>
<td>Alexandra St, Thorne</td>
<td>Main Town</td>
<td>Thorne-Moorends</td>
<td>Site has planning permission approved (August 2020) and sequentially tested as part of the Development Management process.  Helps provide additional housing towards economic-growth need for one of the borough’s largest Towns and addresses consultation comments around lack of</td>
</tr>
</tbody>
</table>

Yorkshire Water has confirmed that discharge of the foul flows can go to the existing public sewer within Hungerhill Lane.

- The site provides a significant contribution to Thorne-Moorends housing supply on a site already allocated for housing that performs well through the SA process with mostly significant positive, positive and neutral effects across the criteria (see below).
- Full ET undertaken by Peter Brett Associates (July 2019).
- A FRA (Peter Brett Associates July 2019) has been submitted as part of the application. The site is located within FZ3 but within an area considered to benefit from flood defences. The River Don defences at this location provide protection in excess of the 1 in 1000 (0.1%) Annual Probability event with significant freeboard remaining above this level. As such, the site is considered to be at
growth/support to the area.

• The majority of the site is not considered to be impacted in the event of breach of the River Don defences however, the north west of the site is considered to be impacted in the 1 in 100 (1%) Annual Probability breach event.
• Predicted maximum flood depths on the site are 0.44m, equating to an approximate maximum flood level of 2.8m AOD.
• The site is also considered to be at risk in the event of pump failure from the Isle of Axholme drainage system.
• The Strategic Flood Risk Assessment defines a local ‘critical flood level’ of 4.1m AOD with respect to this risk.
• The majority of the site is considered as being at a ‘Very Low’ susceptibility to surface water flooding with some areas of higher susceptibility which appear to be associated with topographical low points or existing watercourses within the boundary.
• The site is also considered to be at moderate risk of groundwater flooding.
• Due to the residual risk of defence overtopping.

a low risk of defence overtopping.

The majority of the site is not considered to be impacted in the event of breach of the River Don defences however, the north west of the site is considered to be impacted in the 1 in 100 (1%) Annual Probability breach event.

The site is also considered to be at risk in the event of pump failure from the Isle of Axholme drainage system.

The Strategic Flood Risk Assessment defines a local ‘critical flood level’ of 4.1m AOD with respect to this risk.

The majority of the site is considered as being at a ‘Very Low’ susceptibility to surface water flooding with some areas of higher susceptibility which appear to be associated with topographical low points or existing watercourses within the boundary.

The site is also considered to be at moderate risk of groundwater flooding.

Due to the residual risk of defence overtopping.
breach, pump failure, and surface water and groundwater risks, finished ground floor levels are to be set at a minimum level of 3.5m AOD.

- All sleeping accommodation will be located on the upper floors (placing the sleeping accommodation above the locally defined critical flood level of 4.1m AOD), with flood resistant and resilient measures included up to 600mm from ground floor level.
- These measures have been agreed in principle with the EA.
- Safe refuge can be provided within the upper levels of any new development as floor levels will be located above the critical flood level agreed with the EA.
- A Flood Response Management Plan should be prepared for the development to advise on appropriate measures to be taken ahead of any major flood event.
- Surface water from any proposed development is discharged into the on-site drainage ditches at the greenfield runoff rate. The surface water management strategy utilises SuDS measures in
the form of detention basins and underground storage, with further on-plot measures to be considered at the detailed design stage, to provide water quality and attenuation purposes up to the 1 in 100 (1%) Annual Probability plus 40% climate change event.

- Regular inspection and maintenance will be implemented to maintain the performance of surface water systems and watercourses. A full maintenance schedule will be set out at the detailed design stage.

- There are no outstanding objections from the EA so long as the development is carried out in accordance with the mitigation identified in the FRA and as set out above.

| 396 | North Eastern Rd, Thorne | Thorne-Moorends | Residential | 1 (62%) 3 (38%) | Existing UDP Housing Allocation | Majority of the site area is FZ1 with part of the northern area FZ3; Site failed first sift of sequential test therefore; However, few sites available at the settlement due to extent of FZ3 constraint; Second review of the test identified possible to Yes – more vulnerable – see table below | None – allocation in emerging Thorne & Moorends Neighbourhood Plan | The site provides a notable contribution to Thorne-Moorends housing supply on a site already allocated for housing that performs well through the SA process with mostly significant positive, positive and neutral effects across the criteria. | Only the northern area of the site is FZ3 (38%) and this area is identified as benefiting from existing defences; The developer requirements (Appendix 2 of the local plan pg.289) make clear that there is to be no more vulnerable built development within the part of the site that is FZ3 (although water compatible uses such as open space | TBC through site specific FRA and proposals in due course and as part of the Development Management stage. |
develop FZ1 part with water compatible uses in FZ3 area (open space, landscaping etc);
• Helps provide additional housing towards economic-growth led need for one of the borough’s largest Towns and addresses consultation comments around lack of growth/support to the area.
• Site identified as a Housing Allocation in emerging Neighbourhood Plan;
• Site capacity reduced from Neighbourhood Plan to discount FZ3 area units.

<table>
<thead>
<tr>
<th>501</th>
<th>Adj. 46 Marshlands Rd, Moorends</th>
<th>Thorne-Moorends</th>
<th>Residential</th>
<th>3 (100%)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Existing UDP Housing Allocation;</td>
<td>Site granted planning permission on Appeal (post 1st April 2018) and sequentially tested as part of the Development Management process.</td>
<td>Entire settlement is FZ3</td>
<td>Yes – more vulnerable – see table below</td>
</tr>
<tr>
<td></td>
<td>The site provides a contribution to Thorne-Moorends housing supply on an urban site already allocated for housing that performs well through the SA process with mostly significant positive, positive and neutral effects across the criteria (see below). Full ET undertaken by AAH Planning Consultants (June 2017). The applicant has carried out an assessment of the sustainability benefits of the proposed development, against the relevant criteria contained within the Council’s Local Plan SA to demonstrate how the development contributes to the sustainability objectives of the Local Plan.</td>
<td>The site is located within an area protected by flood defences from the Rivers Trent and Don. The low-lying land in this area is also locally managed by Doncaster East IDB. The low-lying nature of the land means flood waters are likely to preferentially gather in this area compared to adjacent higher land. It also means that in the event of significant flooding, flood waters are likely to persist for a prolonged period, given they will be largely unable to</td>
<td>No</td>
<td></td>
</tr>
</tbody>
</table>
The proposal would see the development of a vacant site, allocated for housing development which is within the settlement limits and will be an efficient use of land.

- The range of house types will improve the housing mix in the area and the site may become 100% affordable housing which will provide greater benefit to the wider community in terms of housing choice.
- The site is sustainably located with close access (80m) to bus stops providing a service every 20mins to Thorne, Doncaster and Goole. There are also cycle opportunities. The site is also within an acceptable walking distance to primary schools, GP surgery, shops and open spaces.
- The applicant also states that the development would benefit the local economy by providing construction jobs, delivering investment in construction, increasing the annual household expenditure in the local area, directly supporting existing business within the town and attracting further investments and trade.

Gravitate away and instead rely almost wholly on being pumped away.

The topic of floor levels has been debated at length with the EA and the applicant given wider planning and design issues that would arise from raising them given the site is a small urban site surrounded by existing housing on all 4 sides, including some bungalows.

- This would have resulted in dwellings being approximately 1.5m - 2m higher in some places than adjacent properties.
- Noting the LPA’s design concerns, the EA stated that they may consider lower floor levels if the applicant considered the topography of the site and raised levels above 2.82m wherever possible, and ground floor sleeping accommodation was removed on the dormer bungalows.
- The applicant has been able to raise all but three of the properties to 3m and 3.1m AOD, proposing resilience to 3.5m AOD.
- The EA acknowledge that the developer has made significant changes to the development to raise FFL; however plots 15, 19 and 23 remain at 2.82m AOD. In relation to
plot 23, whilst this is not an ideal situation, they do understand that this is due to planning constraints with regard to overlooking issues on neighbouring properties and therefore the floor level cannot be raised any higher. With regards to plots 15 and 19, these are apartments located above garages and that there are no habitable rooms located on the ground floor, therefore all living and sleeping accommodation is located above the critical flood level.

- Considering the significant betterment achieved across the wider site the EA did pursue objection to the development on the basis of these three properties, as they were aware that the developer’s intention was to raise the FFL if possible. With this in mind they requested a number of conditions be included.

- The FRA concluded that the proposed development will be safe, by virtue of the proposed floor levels and design. Furthermore, attenuation SuDs will be introduced to the site to reduce surface water run-
off to prevent an increase of the risk of flooding elsewhere.
- Resilient design provisions will be made to the design flood level with additional freeboard allowance. The hazard of floodwater to residents to be mitigated by an advanced warning evacuation plan, however there is refuge at first floor level on all properties.
- The features of flood resilient design include first floor refuge, suspended slab or block and beam concrete floor in conjunction with a Damp Proof Membrane to minimise the passage of water through the ground floor, high quality durable floor finishes, clear cavity wall design, electrical sockets installed at the highest achievable level, sealed PVC external framed doors and windows should also be used.
- A flood evacuation plan is requested by condition which will be assessed by the LLFA.

<table>
<thead>
<tr>
<th>Site</th>
<th>Use</th>
<th>Type</th>
<th>Specific Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Askern Miners Welfare, Manor Way</td>
<td>Service Town/Village</td>
<td>Askern Residential</td>
<td>Site granted planning permission (post 1st April 2018) and sequentially tested as part of the Development. Yes – more vulnerable – see table below. Full – Permission approved by Planning Committee, but Decision Notice not yet issued as at March 2020 17/00095/FULM. The majority of the site is FZ1 (70%) with just the south and western corners of the site within FZ2 (21%). 7 out of the 50 dwellings proposed lie within this part of the site which is Notwithstanding the need for the Exception Test, given no more vulnerable development is taking place in the small part of the improvements to pumping station for foul sewage so betterment compared to existing services serving the Welfare Club.</td>
</tr>
</tbody>
</table>

195

1

(70%)

2

(21%)

3 (9%)
Management process.

FZ2, and a further 3 gardens, so 10 dwellings in total arguably in FZ2.
- More vulnerable residential development in FZ2 does not require the Exception Test.
- The remaining 9% of the site which is FZ3 is the very southern boundary where no development is proposed.
  (landscaping/boundary treatments).

site that is FZ3 (as per the comment in the previous column) an FRA (joc Consultants Ltd - January 2017) has been submitted and the EA raised no objections to this.
- There is no recorded historic flooding to the site.
- The FRA denotes the site is only marginally affected from flooding as identified in the previous column.
- The site has a 0.1 - 1% probability of flooding annually.
- The FRA recommends flood risk management measures should be implemented into the design and construction of the dwellings.
- In terms of the sites drainage, the proposal will increase the impermeable area to the site and it is therefore necessary to ensure the existing surface water system has the capacity to accommodate any increase in surface water discharge from the site.
- The surface water will be disposed of via a soakaway. The soakaways capability would have to be assessed through percolation tests as a drainage condition. Surface water could also be discharged to the water course to the south of the site.
and consent from the IDB would be required.

- In terms of foul sewerage, this will go to the 300mm combined sewer on Sutton Road, however an upgraded pumping station will be required to pump the flows uphill to the sewer. This is to be located at the rear of the Miners Welfare in the car park and will replace the clubs current facility.
- Yorkshire Water has raised no objections. Further detail required by condition regarding the surface water outflows from the site. The submitted Drainage Strategy (Shaun Tonge Engineering - January 2017) indicates all surface water is to discharge to an infiltration and/or watercourse. This watercourse adjoins the site. Consent may be required to discharge into this watercourse from the EA, LLFA and IDB. In terms of water supply additional off site mains reinforcements will be required to serve the development.
- However, no sites available at the settlement due to extent of FZ3 constraint;
- Second review of the test identified this site as being possible to develop FZ1 part with water compatible uses in FZ3 area (open space, landscaping etc);
- Site capacity reduced to discount FZ3 area units and overall extent of the allocation has been scaled down to remove some of the FZ3 area (FZ breakdown in previous column is before site reduction applied).

| significant positive, positive and neutral effects across the criteria. | compared to the original site representation; The developer requirements (Appendix 2 of the local plan pg.268) make clear that there is to be no more vulnerable built development within the part of the site that is FZ3 (although water compatible uses such as open space and landscaping would be appropriate); The site capacity has been significantly reduced to a revised yield for the area that is FZ1 (this is a smaller capacity therefore to that identified through the HELAA); The site promoter has already undertaken technical work, including topographical survey and illustrative master plans, to show how the site could be developed with avoidance of built development in FZ3 parts. | Management stage. |