Examination of the Doncaster Local Plan

Harworth Group Plc
Rossington (Site Ref 247) (Representor Ref 05205)

Hearing Statement
in relation to

Matter 1 – Legal and Procedural Requirements and other General Matters

September 2020
Introduction / Context

1. This Statement is submitted on behalf of Harworth Group Plc (‘Harworth’), specifically in relation to land in which it has an interest at Rossington Colliery.

2. This Statement provides Harworth’s response to the Inspector’s Matters, Issues and Questions (INSP4) for consideration during the forthcoming hearing sessions. Harworth does not intend to participate in the hearing session in relation to Matter 1 and understands that these written comments will carry the same weight as any comments made orally.

3. This Statement relates to Matter 1 regarding Legal and Procedural Requirements and other General Matters’ in particular, the following question which is replicated ahead of Harworth’s response.

Question 1.12

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

4. The Inspector’s text on flood risk ahead of Question 1.12 includes Rossington Colliery (247) within the listed housing allocations. This is then qualified by text that states ‘only parts of these sites are in flood zones 2 or 3, and the Plan assumes that no housing development will take place in those areas’.

Harworth’s Response

5. This question is primarily for the Council’s response. However, as reference is made to one of Harworth’s sites, Harworth comments as follows.

6. The Council’s response to PQ11 as set out in its Appendix PQ11 includes that Site 247 lies within Flood Zone 1 (86% of site area) and Flood Zone 2 (14% of site area).

7. The gov.uk Flood Map for Planning¹ indicates the part of the site within Flood Zone 2 to be at the west of the proposed allocation site (see extracts below).

8. However, it should also be noted that the allocation site (Site 247) has been subject of post-mining restoration earthworks as shown by the overlay plan extract and aerial photograph, whilst adjacent land to the west is being comprehensively developed (i.e. the iPort development, Site 747).

9. The actual flood risk at the allocation site (Site 247) is therefore likely to be dictated by the restoration earthworks undertaken (in accordance with existing approvals) and the drainage infrastructure to be created as part of the development.

10. The indication that part of the site is in Flood Zone 2 is not considered necessarily to reflect the reality of the situation on site, which may also be interpreted by the extent of Zone 2 being defined by straight lines with no bearing to the physical form of the site.

11. Harworth therefore does not accept the indicated assumption that no housing development will take place in areas of Site 247 that are currently indicated to be in Flood Zone 2 on the Flood Map for Planning. The extent and layout of housing development at this site should be considered at the planning application stage on the basis of appropriate flood risk and drainage information.

¹ https://flood-map-for-planning.service.gov.uk/
12. In the context of a colliery restoration site of this nature and the majority part of the site already identified as being at low risk of flooding (Flood Zone 1), the allocation is considered to conform to national planning policy on flood risk as it will not constitute inappropriate development in areas at risk of flooding (paragraph 155).

13. Development at the site will satisfy the sequential test both on the basis that the majority part of the site is Flood Zone 1 and that the part indicated as Flood Zone 2 is currently subject of restoration earthworks that will alter its flood risk from that indicated.

14. Any proposed development within the site shall be appropriately located to ensure that risks to people and property are avoided. Housing development shall not be located in any area of the site which is indicated to be at high risk of flooding following completion of the earthworks and preparation of a drainage scheme for approval.
Figure 3 - Extent of earthworks plan extract with Site 247 boundary

Figure 4 - Extent of earthworks aerial photograph (Google Earth, June 2017)