August 2020
On behalf of KCS Developments Ltd
CJ Ref: J0025755

Carter Jonas
## CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0</td>
<td>Introduction</td>
<td>3</td>
</tr>
<tr>
<td>2.0</td>
<td>MATTER 5 – Housing Supply</td>
<td>5</td>
</tr>
<tr>
<td>3.0</td>
<td>MATTER 6 – Development Requirements</td>
<td>13</td>
</tr>
</tbody>
</table>

**Appendixes**

- Appendix 1: Promotional Document
- Appendix 2: Previous Representations
- Appendix 3: LPA Engagement Schedule
- Appendix 4: Local Ward Member Support Emails
1.0 INTRODUCTION

1.01. This Hearing Statement is made for and on behalf of KCS Developments Ltd (KCS) and responds to selected questions set out within Matter 5: Housing Supply and Matter 6: Development Requirements of the Inspector’s Matters, Issues and Questions.

1.02. The following responses are pursuant to and should be read in conjunction with our comments upon the Publication Draft, dated September 2019 and Hearing Statements submitted as part of this and Matters 1, 2, 3, 4 and 14. Carter Jonas on behalf of KCS is also scheduled to attend and participate in the Examination for the aforementioned matters.

1.03. Please note this statement has been prepared for the exclusive benefit of the respondents as set out herewith and no other parties may use or duplicate the report contents without the written permission of Carter Jonas.

1.04. KCS is actively promoting residential development on land off Ings Lane, Skellow (the site) and has progressed an Option Agreement with the owners of the land.

1.05. The 4.2ha site is proposed for removal from the Green Belt for the development of up to 75 dwellings, as detailed within the site-specific Promotional Document, submitted previously to the Council in January 2019 and again in September 2019 as part of the Publication Draft Consultation. For completeness a copy is attached at Appendix 1 of this Hearing Statement.
1.06. This statement of case therefore details our response to Matter 5 – MIQs 5.1, 5.2 and 5.12. For ease of reference the Inspector’s questions are referenced in bold however, where a specific question is not covered KCS has no comment at this stage of the examination.
2.0 **MATTER 5 – HOUSING SUPPLY**

*Site Selection Methodology*

**Question 5.1**

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

2.01. The Framework explicitly states (paragraph 59)

“…to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed” as part of this “authorities should have a clear understanding of the land available in their area…and from this identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability” (paragraph 67).

2.02. We maintain therefore that it is critical that the levels of development proposed for each settlement are informed by appropriate analysis of the deliverability and viability of the sites, underpinned initially by an appropriate site selection methodology.

2.03. Table 6.26 of the Site Selection Methodology provides a summary of the performance of the housing sites at Carcroft-Skellow against the SA objectives. Site 042 falls adjacent to the western boundary of our client’s site and was discounted due to:

“…significant negative effects on built heritage\(^{1}\) which may not be possible to mitigate because the site is a pasture to the south of Skellow”.

2.04. We also draw cross reference to Matter 2 and 3, highlighting how allocations for Carcroft and Skellow are referred to in a series of tables; the tables themselves are contained in Chapter 16. Chapter 16 paragraphs 16.195 to 16.205 set out the settlement specific approach to Carcroft-Skellow.

2.05. This approach however suggests that Carcroft-Skellow’s housing allocation predominantly falls to a single allocation (without permission as of April 2018) referred to as site ref: 165/186 on land off Crabgate Lane

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\(^{1}\) Please note a detailed Heritage Assessment completed as part of early representations confirms our client’s site is not subject to such built heritage implications.
providing an indicative capacity of 300 houses over the plan period, of which over 40% of these are deferred to the latter years of the plan.

2.06. Whilst reserve site ref: 398 on land off Owston Road, Carcroft indicates provision for up to 93 houses, the Plan makes no reference to when within the plan period these could be delivered if required. We therefore question the effectiveness of the plan inline with paragraph 35 of the Framework and the requirement for Local Plans to be “…deliverable over the plan period…providing an appropriate strategy and taking into account reasonable alternatives”. We also question the dated nature of evidence supporting such assessments and refer back to the requirement for plan-making to “be sufficiently flexible to adapt to rapid change” (paragraph 11).

2.07. As noted elsewhere in our Statements of Case, site 398 lies wholly within an area designated as FZ3 on the Environment Agency interactive flood risk map and as such is sequentially less preferable than the land at Ings Road, Skellow referenced at paragraph 1.04 of this statement of case. This casts grave doubt over the deliverability of site 398 through achieving a satisfactory planning permission.

2.08. Within the explanatory text (para 16.195) it suggests that Carcroft-Skellow is the largest settlement in the Service Towns and Villages tier of the settlement hierarchy, with a good level of services and access to services at Adwick Woodlands. Paragraph 16.197 acknowledges the settlement is tightly bound by Green Belt and extensive areas are also covered by flood zone.

2.09. Over the Plan period, paragraphs 16.198 and 199 explain the settlement function and role of Carcroft-Skellow identifying the housing requirement (of 250 units) over the Plan period to meet its baseline (local needs) requirement of 16 units per year.

2.10. The required uplift in housing supply explored within representations submitted by KCS as part of Matter 2 outlines the requirement for further modifications to the proposed allocations across Carcroft-Skellow, to allow the Borough’s largest settlement within this tier to provide deliverable housing sites from the very beginning of the plan period.

**H2(N) Land at Crabgate Lane, Skellow**

2.11. Paragraph 16.204 supplemented by Table H2(N) indicates the single site allocation (Site Allocations 165 and 186) for land of Crabgate Lane. Totalling 15.1 hectares, the indicative capacity achieves 300 dwellings, assuming areas of lower density and/or buffer zones adjacent the A1(M) to mitigate concerns of noise generated by traffic.

2.12. Being prudent, we would question the ability of the Crabgate Lane site to deliver the dwelling numbers as set out in Table H2(N). This states that the site will deliver 175 units over a five-year period; i.e. 35 units per year. We would suggest that a delivery of 25 units per year is feasible, reflecting the yield for the following five-year period. This would suggest that a number of the units will be delivered beyond the Plan period.
H3(E) Owston Road, Carcroft (Reserve Site)

2.13. A reserve development site (Site Allocation 398) is identified at Table H3(E) off Owston Road, Carcroft comprising 3.3ha of land with an indicative capacity of 93 dwellings. Text at paragraph 16.205 indicates the suitability of this site is questionable given flood risk constraints. It states that the flood risk constraints have not been met through the plan making stage, suggesting that these will be dealt with through any subsequent planning application.

2.14. In our view this is a wholly unsound outcome as it is not demonstrated that the site is suitable for a vulnerable to flooding use such as housing. It is also notable that the Owston Road site remains an allocation from the 2001-16 Unitary Development Plan, marked on the Proposals Map and listed under saved Policy PH1 (Page114) as PH1 (3/15) Land at Owston Road, Carcroft extending to 3.4ha to deliver 84 dwellings.

2.15. It is clear from Doncaster Planning Public Access that there has been little developer interest in the site. Whilst outline planning permission was granted to the landowners in December 2019 under application ref 19/01514/OUTM there has clearly been no developer or promoter activity to progress the site within the development management system. We would question therefore whether it is a suitable and deliverable site given that it has been identified as a housing allocation for at least two decades.

2.16. In light of the above we have fundamental concerns with regard to the overall amount of potential housing land identified for Carcroft-Skellow as the Council is seeking to not even meet the demonstrable requirement set out within the plan. Even with attempting only to meet that suppressed requirement, we note also that the reserve site at Owston Road, Carcroft is not suitable or deliverable.

2.17. In addition to the lack of developer interest since 2001 we reiterate the comments at paragraph 2.07 above and elsewhere in the statements of case on behalf of KCS that site 398 will fail any sequential flood risk test when considered against the land at Ings Road.

Land at Ings Lane, Skellow

2.18. To address concern over a lack of housing sites to meet an uplifted OAN and housing land requirement we have concluded that additional sites need to be allocated in the Plan to make it sound. As a result, we recommend that the Council should identify more land for housing, including further releases from the Green Belt. We consider that land to the west of Ings Lane, Skellow is a suitable and deliverable site. The site proposed for removal from the Green Belt is identified at Appendix 1 with a gross site area of 4.2ha.

2.19. Details within the attached promotional document (which has been submitted to the Council previously) demonstrate how the site is available, suitable and achievable, capable of delivering around 75 dwellings (at 30dph). This scale of development is considered proportionate to the village’s housing requirement. The site is in close proximity to the village centre and a level 100m walk to bus stops. To illustrate this excellent level of
accessibility and connectivity, the site is a one-minute walk from the One Stop convenience store at 221 Skellow Road.

2.20. Currently, the land is pasture bounded by a mix of thick woodland and hedging that forms a border around the site. The entire site is gently sloping. Both Ings Lane to the east and South Farm Drive to the north-west directly adjoin the property and are adopted highways. The site is not crossed by any Public Rights of Way.

2.21. The site’s failure to meet the five purposes of Green Belt, previously evidenced as part of representations submitted in April 2019 and for completeness also included at Appendix 1 concludes on the basis of limited harm to the Green Belt in line with identified housing need and sustainable development at the core of the plan-making process, exceptional circumstances exist to justify the removal of the site from the Green Belt and inclusion of this site as a housing allocation, in compliance with the Framework.

2.22. As confirmed in our statement of case for Matters 1 and 14, following extensive work by our flood risk consultants the Environment Agency has agreed that its online Flood Map for Planning is inaccurate in that FZ3 is shown to encroach onto the site whereas the work by JPG and JBA more accurately shows a separation distance between the site and FZ3 with a strip of FZ2 between, as follows:

2.23. We note that the flood modelling work provides a significantly more accurate assessment of risk of flooding in this location. The data used by the EA was to the nearest contour line, spread 10m apart and therefore EA mapping can only provide an indicative boundary. In contrast to this, JPG have modelled EA data on flood levels against an up to date topographical survey to deliver an accurate representation of flood risk for the site and surroundings. As noted throughout our statements of case we consider the Flood Zone 1, 2 and 3 boundaries using JGP Group’s analysis of 2018 EA data to present a significantly more accurate assessment of flood risk.
and should have been used as part of the Sustainability Appraisal and site selection evidence base when the
council considered the appropriate housing allocations for Skellow against reasonable alternatives.

2.24. The site has no known limitations that would restrict development other than being washed over with a Green
Belt designation and the Council has already accepted that there are exceptional circumstances for removing
land from the Green Belt. As set out in the attached promotional document we consider that the site performs
weakly in terms of the purposes of Green Belt, as evidenced in the Stage 3 Green Belt Review, through cross-
reference to site 42, a comparative neighbouring site immediately to the west.

2.25. Similarly, the land at Ings Lane when viewed within the wider landscape and topography, is only seen from the
south, set against the existing built-up backdrop of Skellow. Existing development on two sides (North and East)
and a screen of woodland to the West combine with land levels to ensure that development will not intrude into
the wider landscape. As a result, the development of the site for housing would result in no significant effects
upon Green Belt openness.

2.26. Additionally, the development of the Ings Lane site will not breach the characteristics of the tightly drawn Green
Belt surrounding Carcroft-Skellow in the same way that the provisional housing allocation of Green Belt sites
165 and 186 will result in. These two sites appear to have been selected as they are not at risk of flooding.

2.27. As explained throughout our Statements of Case for KCS, the Ings Lane site is neither at risk of flooding, nor
within close proximity to the A1 Motorway. Therefore, we reflect that this site is as appropriate, if not more so
for residential development than other sites under deliberation, especially due to close proximity to shops and
services. We consider this omission in favour of less sustainable options illustrates failings in the site selection
process.

2.28. We also cross-refer to issues relating to timing as previously highlighted in Matter 1, receipt of updated evidence
to inform the site’s suitability and the Council’s reluctance to consider this ahead of examination. As part of this
we include a detailed summary of our ongoing requests submitted to the Council to illustrate the Council’s lack
of engagement with the most recent flood risk information, attached at Appendix 3.

2.29. In addition, ongoing discussions with Local Councillors Gilliver and White highlight their maintained support for
residential development of the site, as submitted to policy officers on the 30th of March 2020 and attached for
completeness at Appendix 4.

2.30. To summarise, the site is immediately available and suitable for development with few restrictions. The
Framework places a large emphasis on smaller sites that can deliver housing quickly and seeks to diversify the
variety of housing within residential market areas. The removal of the Green Belt designation and inclusion of
this site as a draft housing allocation conforms to the aspirations of the Framework and creates a logical and
efficient extension of the settlement.
2.31. In order to assist the Council in its consideration of this site, in addition to the Promotional Document, the following reports have been previously supplied: Access Appraisal (Optima Highways); Heritage Impact Assessment (Prospect Archaeology); and Coal Authority Report.

2.32. The supporting Site Selection Methodology as illustrated using the example above fails to identify an appropriate number of small-medium scale sites across Skellow in line with paragraph 68 of the Framework identifying “small and medium sized sites can make an important contribution to the meeting the housing requirement of an area, and are often built-out relatively quickly local planning authorities should…use tools to help bring small and medium sized sites forward”.

2.33. Furthermore and notwithstanding the many other points we raise, the selection of Site 398 as a reserve housing site despite the fact that it lies within FZ3 and set against the fact that the council has failed to even consider the Ings Road site despite being in the heart of the settlement and designated FZ1 go a long way toward reaching our conclusion the Site Selection Methodology used in preparation of the Plan is neither robust nor justified as required by national policy.
Overall Supply for the Plan Period 2015 - 2035

Question 5.2

Assuming it is modified to include the figures in CSD6, does the Plan identify sufficient land to ensure that the strategic aim of delivering 18,400 new homes in the Plan period 2015 to 2035 can be achieved?

2.34. We refer back to the comments outlined above illustrating how the Plan, with particular reference to Skellow, relies upon a single allocation to deliver the required housing need, with the reserved site understood to be neither suitable nor deliverable.

2.35. Previous comments made in relation to the aforementioned Site Selection Methodology highlight how the strategic aim of delivering 18,400 new homes can not be achieved due to a lack of deliverable sites across the Service Towns, including the Council’s approach which disregards the contribution small and medium sized sites can make towards meeting the housing requirement of an area.

Housing Trajectory

Question 5.12

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

2.36. The Framework details how the planning system should be genuinely plan led and “contain policies that are clearly written an unambiguous” (paragraph 16). As part of this “strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed need over the plan period...this should include planning for and allocating sufficient sites to deliver strategic priorities of the area” (paragraph 23).

2.37. If we assume homes are delivered at the rates suggested by the trajectory, it remains unclear how the Council will ensure they maintain an ongoing five-year housing land supply, especially in the later years of the Plan. This assumes the Council will monitor their five-year supply position to ensure continued monitoring allows for the provision that further sites may be brought forward if needed.

2.38. Our client’s site falls adjacent to the development limits of a Service Town and therefore we welcome the approach to allowing development here. However, in light of the above analysis and representations made as part of Mater 2 we also continue to draw cross reference to the Plans under delivery and suggest the need for sites adjacent to development limits will be needed as part of providing for the Boroughs housing requirement, far in advance of future five-year housing land shortages.
2.39. We therefore refer back to national policy and the requirement to identify a clear strategy for bringing sufficient land forward, at a sufficient rate to address the assessed needs of the area, including cross reference to Matter 4 and the requirement for a comprehensive comparative Green Belt Review. Highlighting once again the need for the Local Plan to be informed by recently updated flood risk assessments and to acknowledge as part of spatial strategy the contribution small scale sites can make to meeting housing need.
3.0 **MATTER 6 – HOUSING DEVELOPMENT REQUIREMENTS**

3.01. Matter 6 considers site specific requirements for housing allocations without planning permission. Policy 6 states that the housing allocations without planning permission listed in Tables H2(A-Q) will be developed in accordance with the specified developer requirements set out in Appendix 2.

3.02. As part of our responses to the Inspector’s questions under Matter 6 we refer back to previous representations submitted and maintain the view that the strategic policy as presented is not considered to be sound, justified or consistent with national policy for the following reasons:

**Housing Mix**

3.03. Policy 8: Delivering the Necessary Range of Housing states:

*The delivery of a wider range and mix of housing types, sizes and tenures will be supported through the following measures:*

A) *new housing developments will be required to deliver a mix of house size, type, price and tenure to address as appropriate the needs and market demand identified in the latest Housing Need Assessment…*

3.04. We consider that such a policy is unnecessary and unjustified, especially as an authority-wide requirement. For a mixed housing market character area such as can be seen within Skellow it should be left for housebuilders, developers and promoters to deliver what the market dictates instead of having mixed imposed by a council-led Housing Need Assessment. Through strikethrough and additions in bold we suggest that Policy 8 should be re-worded as follows:

*The delivery of a range and mix of housing types, sizes and tenures will be supported through the following measures:*

A) *new housing developments will be required to deliver a mix of house size, type, price and tenure to address as appropriate the needs and market demand within the associated local housing market area, as identified in the latest Housing Need Assessment.*

3.05. It is also important to highlight the need for creating a housing market that will attract investors to Doncaster, and to provide an element of aspiration to ensure working people and families are retained within the area. We maintain therefore that the Council should recognise that any Housing Need Assessment will only identify current deficits and reflect a snapshot in time. It is important to ensure that there will be the greater flexibility within policy...
to acknowledge that mix can vary both geographically and over the plan period, as inherent within the revised policy wording, we suggest at paragraph 3.04 above.

**Affordable Housing**

3.06. This policy requires housing sites of 15 or more homes in the Borough’s highest value housing market areas to include 23% affordable housing provision with 15% across all other areas.

3.07. We do not dispute the need for affordable housing across Doncaster and the need to address the affordable housing requirements of the area. Provisions within the Framework are, however, clear that affordable housing policies are required to consider both need and viability. Paragraph 34 establishes the importance of viability to ensure development is not subject to obligations or policy burden that threaten their deliverability.

3.08. The Plan Viability Testing Report (2019) explores viability across a number of sites and illustrates that schemes in the low value areas are not viable and will not be able to support the Plan’s affordable housing requirement. We maintain that the Council should be mindful that it is unrealistic to negotiate every site on an individual basis when the policy criteria at the proposed level jeopardises future housing delivery. Site by site negotiations on such sites should occur occasionally rather than routinely as the policy proposes.

**Development Viability**

3.09. Paragraph 6.10 of the plan makes it clear that the affordable housing requirements of policy 8 part B take account of economic viability as well as housing need. As previously highlighted in representations, this approach is not considered to be sound as is it not consistent with national policy. Whilst there may be circumstances where this policy and the use of trigger points can be utilised to bring forward the delivery of housing, we maintain significant concerns regarding the potential frequency this policy may need to be used.

3.10. The use of suggested trigger points could add further burden to any developer who will need to reproduce viability assessments on a potentially regular basis, going against Government initiatives seeking to actively reduce the need for viability assessments. This policy approach therefore causes unnecessary uncertainty and additional risk for developers which in turn could become an impediment to the development process.
APPENDIX 1: PROMOTIONAL DOCUMENT
# CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0</td>
<td>INTRODUCTION</td>
<td>1</td>
</tr>
<tr>
<td>2.0</td>
<td>SITE CONTEXT</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>Overview</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>Site Description</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>Accessibility</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Flooding</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Heritage</td>
<td>5</td>
</tr>
<tr>
<td></td>
<td>Mineral Safeguarding</td>
<td>5</td>
</tr>
<tr>
<td></td>
<td>Agricultural Land Classification</td>
<td>5</td>
</tr>
<tr>
<td></td>
<td>Landscape Character Assessment</td>
<td>5</td>
</tr>
<tr>
<td></td>
<td>Ecology</td>
<td>5</td>
</tr>
<tr>
<td></td>
<td>Planning history</td>
<td>5</td>
</tr>
<tr>
<td>3.0</td>
<td>PLANNING POLICY CONTEXT</td>
<td>7</td>
</tr>
<tr>
<td></td>
<td>Emerging Policy</td>
<td>8</td>
</tr>
<tr>
<td></td>
<td>Local Plan Evidence Base</td>
<td>9</td>
</tr>
<tr>
<td>4.0</td>
<td>GREEN BELT REVIEW</td>
<td>12</td>
</tr>
<tr>
<td></td>
<td>Purpose 2: To prevent Neighbouring Towns from merging into one another</td>
<td>13</td>
</tr>
<tr>
<td></td>
<td>Purpose 3: To assist in Safeguarding the Countryside from Encroachment</td>
<td>13</td>
</tr>
<tr>
<td></td>
<td>Purpose 4: To preserve the setting and special character of historic towns</td>
<td>13</td>
</tr>
<tr>
<td></td>
<td>Purpose 5: Assists in urban regeneration, by encouraging the recycling of derelict and other urban land</td>
<td>14</td>
</tr>
<tr>
<td>5.0</td>
<td>SUSTAINABILITY ASSESSMENT</td>
<td>15</td>
</tr>
<tr>
<td></td>
<td>Sustainability of the Site</td>
<td>19</td>
</tr>
<tr>
<td>6.0</td>
<td>CONCLUSION</td>
<td>20</td>
</tr>
</tbody>
</table>
1.0 INTRODUCTION

1.01 Carter Jonas LLP is instructed by KCS Development Ltd to prepare this submission for Land West of Ings Lane (the site), Skellow to support release from the current Green Belt classification and subsequent allocation for residential use through the emerging Doncaster Local Plan. This report should be read in conjunction with the technical and environmental reports and surveys commissioned to support this submission. If you have any queries regarding the site or this document, please contact Joel Gandhi (Joel.Gandhi@carterjonas.co.uk or 0113 203 1074) or Paul Leeming (Paul.Leeming@carterjonas.co.uk).

1.02 Doncaster Council is progressing with the preparation of a new Local Plan for the District through to 2032, setting out how it will meet the objectively assessed development needs of the community and how this will be distributed across the District. A revised Local Development Scheme (LDS) was published in March 2019 following the commissioning of further evidence. The updated LDS sets out the following schedule for the preparation of the next stages of the Local Plan:

- Consideration of Draft Plan by Council - Late Spring 2019
- Publication – Early Summer 2019
- Submission – Late Autumn 2019
- Examination in Public - Winter 2019
- Inspector’s Report – Spring 2020
- Adoption - Summer 2020

1.03 Consultation on initial draft sites and policies occurred in September/October 2018; the site was not submitted at that time as no promoter had been appointed. Until late 2018, Environment Agency mapping suggested part of the site to be within Flood Zone 3, however detailed investigation by JGP Engineers in 2018 underpinned by a site specific topographical survey confirms the majority of site within Flood Zone 1; Confirmation of this position by the Environment Agency is still pending. Therefore, it is considered an appropriate time to submit this site ahead of the finalisation of the plan document and its submission for Examination, with Environment Agency advice to follow.

1.04 Within the emerging Plan, the Council seeks to meet the objectively assessed development needs of the District including housing and to facilitate the delivery of at least 920 (net) new homes each year over the plan period (2015-2032). A settlement hierarchy is identified as the focus for accommodating this development, with the Council recognising that the Green Belt will need to be reviewed around some settlements to achieve a sustainable pattern of development. Carcroft and Skellow is provisionally identified as one of 10 Service Towns/Villages with a proposed minimum target of 250 new homes, based on the most recent evidence base. It is considered land west of Ings Lane can sustainably contribute to meeting part of that housing target.

1.05 This document sets out the suitability and appropriateness of the site in the context of the Council’s evidence base and assessment methodology in particular the Green Belt Review and Site Selection Methodology, as well as a comparison with the Sustainability Appraisal (objectives) which underpins the emerging Local Plan. This document should be read alongside other supporting information contained within the submission. These include:

- Heritage Impact Assessment (Prospect Archaeology);
- Transport Appraisal (Optima Highways);
- Coal Authority Search;
- Mineral Resource Assessment (E3P);
- Preliminary Utilities Services Map (MRB); and
- Revised Flood Mapping Boundary (JPG Group).

1.06 This remainder of this submission is structured as follows:

- Section 2 provides a context and description of the site;
- Section 3 reviews the emerging planning policy context and national plan-making considerations;
- Section 4 reviews the Green Belt using the Council's Green Belt Review and Stage 3 assessments;
- Section 5 considers the sustainability of the site against the emerging Local Plan objectives; and
- Section 6 draws various conclusions.
2.0 SITE CONTEXT

Overview

2.01 Skellow (along with the adjacent settlement of Carcroft) is a community of 8,500 people (2011 Census) immediately to the east of the A1 Great North Road and to the north of J38 A1M. It sits within a rural landscape some seven miles north of Doncaster.

2.02 Parts of the settlement along the main Skellow Road (B1220) date from the mid-1600s and include remnants from the English Civil War; although a motte and bailey castle suggest earlier settlement. These historical elements of the settlement are recognised with the designated Conservation Area; these are discussed further in the accompanying Heritage Statement. Much of the current form of the settlement is of twentieth century origin associated with the coal mining industry, along with more general suburban housing estates of the late twentieth century. Coal mining in the area at Bullcroft Colliery ceased in 1968.

2.03 Skellow (and Carcroft) is well served with schools, community facilities, open space, parks, local shops and larger supermarkets and there are major employment areas locally on the Carcroft Enterprise Park.

Site Description

2.04 As seen from the figure 1 below, the site lies south of Skellow Road (B1220), adjacent to Ings Lane in the south of Skellow, and accessed via Ings Lane or a pedestrian footpath from South Farm Drive.

Figure 1: Aerial view of Skellow with A1 road to west, proposed housing allocation site outlined in red (for reference only).
2.05 The site is approximately 2.5 ha (6.5 acres) in size and rectangular in shape. It is arable farmland which is currently fallow to pasture. The entire site is gently sloping towards the Old Ea Back watercourse to the south. Boundaries comprise a mix of thick woodland to the west, and hedging with mature trees to the south, forming a well-defined border around the site, albeit more broken and open along the (east) Ings Lane frontage. To the north the boundary is a mix of field hedge and (rear) garden boundary walls.

2.06 There is modern residential development on two sides of the site, to the north (fronting Skellow Road) and to the east of Ings Lane, namely Humber Court and Humber Close. Immediately to the north east is the Skellow Social Club and the Skellow Local Centre which contains a range of small local shops, bakery, newsagents, a Post Office and services along with a small convenience store (one Stop Shop).

2.07 Vehicular and pedestrian access is available directly from the adopted public highway off - Ings Lane to the east and South Farm Drive to the north-west directly adjoining the property. A Local Authority search has confirmed the site is not crossed by any Public Rights of Way.

Accessibility

2.08 As described above there is potential to achieve a safe and appropriate access into the site from two locations with adopted highway along the entirety of the eastern site frontage, off Ings Lane. These matters have been appraised by Optima Highways (2019) including capacity issues on the local highway.

2.09 At Appendix 1 of this report a more detailed assessment has been given of accessibility to services and facilities by means other than the private car.

2.10 The report identifies that the site is immediately adjacent to the southern edge of Skellow Local Centre, and within an easy level walk to a range of existing essential services and facilities most within five or ten minutes.

The majority of Skellow is located within a 5 minute cycle journey of the site, however additional employment opportunities and facilities are located within a half hour bicycle ride such as Redhouse Interchange, Carcroft Enterprise Park and Wellsyke industrial Park.

2.11 Regular and frequent bus services are available along Skellow Road which provide up to 8 buses per hour (two way) Monday to Friday between Cantley, Doncaster and Askern (Instoneville). The nearest bus stops are on the Skellow Road in front of the Social Club; i.e. within 100m of the site.

2.12 Adwick Interchange (AWK) is located approximately 2.5km south east of the Site off Adwick Lane providing access to local and regional rail services. There are lit footways leading to the station and both cycle and car parking facilities are provided. Adwick Interchange provides regular services to Leeds, Doncaster, Wakefield and Sheffield.

Flooding

2.13 Evidence from the Environment Agency has identified parts of Carcroft and Skellow as well as surrounding land as low-lying and with some areas located in Flood Zones 2 & 3, at highest vulnerability to the risk of flooding.

2.14 Site specific flood modelling carried out by JGP Group using 2018 Environment Agency data and a detailed topographical site survey are submitted alongside this report. These confirm the entire proposed housing allocation is located in Flood Zone 1, at lowest risk of flooding on the Environment Agency Flood Map. Part of the site not proposed as a housing allocation, directly to the south, is designated flood zone 3, the most severe risk of flooding and is proposed as public open space.
Heritage

2.15 Six designated assets have been identified within close proximity to the site. These include two grade II Listed barns, a grade II Listed house, a Listed (grade II) and scheduled medieval cross base, earthworks of a scheduled motte and bailey castle, all within the Buttercross Conservation Area designated in November 1991. This identifies that the boundary of the designated area abuts the north western corner of the site (at South Farm Drive), but does not include any part of it. A heritage appraisal supplements this document.

Mineral Safeguarding

2.16 The site partially lies within a mineral safeguarding zone, the Council intend to protect Limestone Bedeck deposits from development in order to maintain strategic reserves. A mineral resource assessment has been procured to assess the site against Council mineral policies.

Agricultural Land Classification

2.17 Grades 1-3a are considered Best and Most Versatile Agricultural Land (BMVAL) across England and Local and National Policy seeks to maintain land of this grade. Assessment of the Agricultural Land Classification Yorkshire and the Humber (ALC003) published 24th August 2014 indicates the site is grade 3 agricultural land, in close proximity to non-agricultural, urbanised land (Skellow).

Landscape Character Assessment

2.18 The site is located in D2 – Hampole Limestone River Valley of the Doncaster Landscape Character and Capacity Study (2007).

Ecology

2.19 A MagicMap search indicates no environmental or ecological designations within the site or in the surrounding area that would prohibit development of the site.

Planning history

2.20 There is no recent planning history for the application site in respect of the current Local Plan. Nor has the site been promoted through the Local Plan process or submitted to the Strategic Housing & Employment Land Availability Assessment before this.

Indicative Sketch Layout
2.21 In considering the site and issues that have been identified, an indicative sketch layout of how the site might be developed, with 80 residential dwellings within the developable area of the site adjoining existing development; the residual area will provide public open space to the south extending to 1.35 ha (3.34 acres).

Figure 2: Indicative Sketch Layout showing up to 80 dwellings with public open space to the south (Ellis Healey, 2019).
3.0 PLANNING POLICY CONTEXT

3.01 This section sets out relevant the policy context where local authorities are preparing or revising their development plan. It also provides an overview of relevant draft policies and evidence in the emerging Local Plan.


3.02 An updated National Planning Policy Framework (the Framework) was published 19 February 2019. Annex 1: Implementation of the Framework sets out the relationship between the Framework (and PPG) to various local planning documents stating that it is a material consideration from the date of publication (para 212) for the process of plan making.

3.03 Throughout, the Framework makes clear the purpose of the planning system is to contribute to the achievement of sustainable development and promote economic growth, social inclusion and environmental sustainability. It indicates that the contents and policies of the Framework should be read as a whole and constitutes the Government’s view of what sustainable development means in practice.

3.04 Paragraph 8 sets out the objectives of sustainable development emphasising support for a strong and competitive economy (Economic and Social Objectives) and contribution to protecting and enhancing the natural, built and historic environment; including making effective use of land (Environmental Objective). It states that the planning system must support sustainable economic growth.

3.05 Paragraphs 15 to 22 focus on the plan-making process and suggest that development plans should be prepared with the objective of contributing to the achievement of sustainable development and be positive, in a way that is aspirational but deliverable. Of particular note, paragraph 22 emphasises a need to plan for a minimum of 15 years, and longer where Green Belt reviews take place in order to accommodate longer term requirements and maintain the permanence of Green Belts.

3.06 Paragraphs 31 to 33 outline the approach to preparing and reviewing plans, stating spatial development strategies should be informed by a sustainability appraisal, demonstrating how the plan has addressed economic, social and environmental objectives. It goes further, indicating that significant adverse impacts should be avoided and alternative options that reduce or eliminate such impacts should be pursued.

3.07 Paragraphs 35 to 37 provide the context as well as the process of examination and the 4 critical requirements for assessing the soundness of a plan:

- **Positively prepared** – providing a plan that seeks to meet objectively assessed need’s (at a minimum);
- **Justified** – appropriateness, taking account of all reasonable alternatives based on proportionate evidence;
- **Effective** – deliverable over the plan-period; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the Framework

3.08 Paragraphs 117 to 119 state planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. They also state plan-making authorities should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs.
3.09 Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in particular promoting the development of under-utilised land, especially where land supply is constrained and available sites could be used more effectively.

3.10 Paragraph 133 reiterates that the Government attaches great importance to Green Belt and their fundamental aim to prevent urban sprawl. Paragraph 134 outlines that Green Belt serves five purposes, preventing urban sprawl and the merging of towns; maintaining the openness around urban areas; maintaining the setting and character of historic cores and safeguarding the countryside.

3.11 Paragraph 136 indicates that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.

3.12 Paragraphs 137 & 138 note that all other reasonable options for meeting identified (housing) need should be explored before Green Belt is released; for example through consideration of brownfield land opportunities. Further to this, it suggests that when ‘reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account’ and ‘where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport’.

3.13 Paragraph 139 emphasises that when setting Green Belt boundaries, consistency with requirements for sustainable development are considered and the use of physical features that create new recognisable boundaries that are likely to be permanent is preferred.

Emerging Policy

3.14 The emerging Doncaster Local Plan is at an early stage of preparation. A document entitled ‘Informal Consultation: Draft Policies and Proposed Sites’ was consulted on until 26th October 2018.

3.15 Draft Policy 2: Spatial Strategy and Settlement Hierarchy (Strategic Policy): sets out the Council’s overall Strategy and confirms that new development (including homes, supporting services and associated jobs) will be focused in and around existing urban areas (primarily Doncaster’s ‘Main Urban Area’, its 7 ‘Main Towns’ and 10 ‘Service Towns and Larger Villages’). At least 50% of new homes will go to the ‘Main Urban Area’, about 40% to the ‘Main Towns’ and around 10% to the ‘Service Towns and Larger Villages’.

3.16 Skellow is identified as one of the ‘Service Towns and Larger Villages’ within the settlement hierarchy, these provide a good range of services meeting their own needs and the local area. The draft policy states ‘To maintain and enhance their role as service towns and larger villages which provide housing, employment, retail, and key services and facilities for the local area, these settlements will be a focus for accommodating an appropriate level of growth’.

3.17 An overarching approach to the Green Belt is set out in Part 5 of the policy suggesting that the overall extent will be maintained, and a supply of safeguarded land will be maintained equivalent to five year supply of development land.

3.18 Draft Policy 3: Level and Distribution of Growth (Strategic Policy): confirms that the Council’s strategic aim is to facilitate the delivery of at least 920 (net) new homes each year over the plan period 2015-2032 (15,640 homes in total) with sufficient land allocated to deliver at least 15 years’ supply (13,800). In particular, the policy text highlights that land for a minimum of 250 dwellings is to be identified in Carcroft and Skellow over the plan period (2015-2032).
3.19 Draft Policy 6: Housing Allocations: refers to the distributional elements of Policy 3 and states the housing (and other) allocations will be identified on a Proposals Map.

3.20 Draft Policy 8: Delivering the necessary range of housing: outlines how the Council will ensure the delivery of a wider range and mix of housing types, sizes and tenures will be supported, proscribing ‘new housing developments will be required to deliver a mix of house size, type, price and tenure to address as appropriate the needs and market demand identified in the latest Housing Need Assessment (or other robust evidence)’.

3.21 Draft Policy 14: Promoting sustainable transport within new developments: confirms that proposals are required to make appropriate provision for access by sustainable modes of transport to protect the highway network from residual vehicular impact.

Local Plan Evidence Base

3.22 Underpinning the emerging Local Plan are a series of evidentiary documents which inform the strategy and the proposed sites for allocation. Those considered to be of relevance include:

Economic Forecasts and Housing Needs Assessment

3.23 Published in June 2018 this report provides information on the Objectively Assessed Needs (OAN) for the District for the plan period to 2032, recognising that the report is prepared in a period of transition for the planning system. A range of projections and forecasts based upon a “business as usual” approach or a job-led housing need approach consistent with the Sheffield City Region job growth aspirations produce a range of housing projections of between 590 and 1060 dwellings per annum (DPA).

Settlement Background Paper

3.24 Prepared to inform the 2018 consultation the paper explains how the local plan’s housing strategy emerged and in particular supports the approach set out in Policy 2 (Settlement Hierarchy) and Policy 3 (Distribution and level of Growth). This Background Paper is informed by a Settlement Audit (updated February 2017) and Settlement Profile which describes Carcroft-Skellow as the largest of the Tier 3 Settlements (Service Towns and Villages) providing a large number of primary services and has a close relationship with Adwick-Woodland. It suggests that Carcroft Skellow is well placed to take a higher proportion of the housing allotted within that tier of the settlement hierarchy.

3.25 It also highlights that Carcroft Skellow is deficient in both formal (-0.89ha) and informal (-3.44ha) open space. Consequently the accompanying Greenspace Audit identifies a priority in Skellow to provide additional formal and informal open space.

Housing and Economic Land Availability Assessment (HELAA)

3.26 The Doncaster Housing and Economic Land Availability Assessment (HELAA) is part of the Council’s evidence to inform the selection of Housing and Employment Allocations in the new Local Plan and to provide the basis for demonstrating the on-going 5-year housing land supply position.

3.27 It is required by national guidance and includes sites that were submitted in the “call for sites” that took place at the end of 2014 and also includes sites with planning permission. The assessment is monitored and updated annually, the 2017 update was published in July 2017 and provides a revised summary of land availability for the borough as at 1 April 2017.

Identifying Development Limits Methodology Paper
3.28 Published as a draft for consultation in 2018 the Paper sets out a number of principles for how development limits (DL) will be determined. It suggests what will be included within the limits and what will be excluded. With regard Skellow the Paper suggests any changes to the DL review will be co-ordinated with the Green Belt Review Paper.

Green Belt Review

3.29 Consultants (Arup) were commissioned to undertake a review of Green Belt in the District as the Council concluded that there is insufficient brownfield land and the need to promote a sustainable pattern of development requires the removal of land from the Green Belt to deliver the Local Plan strategy. For example, Carcroft-Skellow is entirely surrounded by a tightly drawn Green Belt boundary, therefore in order to meet its minimum identified housing growth (250 homes) up to 2032, the Council has acknowledged land must be removed from the Green Belt.

3.30 A three stage process was undertaken for the Green Belt Review comprising a Stage 1: Definition Green Belt Purposes and assessment of General Areas, followed by Stages 2 and 3 comprising a Technical Site Constraints Analysis and Resultant Green Belt boundaries. The site is located in northern boundary of Green Belt parcel ‘Carcroft 1’ within the Review (2016) as seen from figure 3 below.

Figure 3: Extract from ARUP Stage 1 Green Belt Review (2016) with Carcroft 1 parcel (site outlined in purple, for reference only).

3.31 Within the Stage 2 Assessment, the appraisal of the Carcroft 1 parcel with the five purposes of the Green Belt suggests the following:

- **Purpose 1 - to check the unrestricted sprawl**: suggests that the Green Belt boundary in this location is angular and indented and does not perform a strong function in preventing urban sprawl.
Purpose 2 - Preventing towns from Merging: suggests that the area serves as a largely essential gap, but whilst relatively narrow provides sufficient visual and perceptual gap and that some development may be appropriate as it would not result in the merging, coalescence or erosion of a valued gap.

Purpose 3 - Safeguarding the Countryside from Encroachment: identifies the area to have a rural character but with a range of unnatural landforms and few features which are distinctive or rare indicating that the Green Belt in the area is of a low to moderate sensitivity to encroachment.

Purpose 4 - Historic Cores: suggest that the area does not perform a strong role.

Purpose 5 - Regeneration: suggests that the area performs a strong role in assisting with urban regeneration.

3.32 Within the Stage 3 Green Belt Review (2017) the report examines the implications of removing specific sites from the Green Belt to accommodate housing or employment allocations in terms of their contribution to Green Belt purposes, then secondly the effect of their removal from the Green Belt upon the robustness (permanence) of Green Belt boundaries. Six sites around Skellow and Carcroft are included in the Review. Of relevance are Site 042 Land to the rear of Skellow Hall which is directly adjacent to the site and contained in the same Stage 2 Parcel “Carcroft 1”, along with sites 165 & 186 which emerged as the Council’s preferred sites for housing allocations. These assessments have been used to provide comparative analysis in section 4.
4.0 GREEN BELT REVIEW

4.01 Some six sites were assessed around Skellow as part of the Stage 3 GB Review to deliver a minimum of 250 dwellings over the Plan period. Below is the ARUP Green Belt Review (2016) assessment of Carcroft 1, in relation to the parcels strength in serving the five purposes of the Green Belt. The assessment provides an overview of the entire parcel, as evidenced from figure 4, the proposed site lies adjacent to the development limit of Skellow, where development extends further south along the eastern side of Ings Lane.

Comment on Boundaries

4.02 Stage 3 analysis for Site 042 suggests the site boundaries are strong (in isolation) and well defined by dense tree belts. It suggests however that consequential changes to the GB boundary would be detrimental resulting in an indented, stepped and irregular boundary which would be weak and inconsistent, potentially undermining the permanence of the GB boundary to the south of Carcroft/Skellow.

4.03 Taken in context this would suggest that the eastern boundary to Site 042 is substantial and well defined. This would provide the western boundary to this site.

4.04 Elsewhere, analysis of site boundaries suggests that where proposed Green Belt boundaries consist of agricultural field boundaries that these are inherently weakly defined and not likely to be permanent features. Therefore use of field hedgerows needs to be considered in combination with other factors.

4.05 Considering the southern site boundary is a defined hedge line with mature trees, it is considered that in isolation the boundary would be moderate. However, it would be anchored by two “strong” features; to the east the hedge aligns with the edge of modern residential curtilages at Humber Court, and to the west, the tree belt within Site 042. Therefore, the proposed Green Belt boundaries are strong as a collective and would create a smoother boundary than site 042.

4.06 It is suggested the summary narrative would state

**Strong:** The proposed Green Belt boundary would be defined by a moderately dense and well defined field boundary in the south and a strong tree belt to the west. The proposed Green Belt boundary would therefore be strong; and the resultant Green Belt boundary would create a rounding off to the built form of Carcroft and Skellow adjacent to existing development off Skellow Road and Ings Lane.

Comment on Performance against Green Belt Purposes

Purpose 1: To check the unrestricted sprawl of large built-up areas

4.07 **Score 1:** The Green Belt parcel ranks lowest in checking the unrestricted sprawl of large built-up areas. Carcroft and Skellow is identified as a ‘Small Urban Area’ within the Doncaster Local Plan Issues and Options (2015) which means it is not identified as a ‘large built up area’ within the original designation of the Green Belt or following the analysis of primary tier settlements within neighbouring authorities.

4.08 The Green Belt at this location is therefore connected to the South Yorkshire Green Belt, but not in close proximity to any large built up area and does not serve to check the unrestricted sprawl of large built-up areas.

4.09 The site is in close proximity to the river Skell, as well as Old Ea Beck, designated as Flood Zone 3, these two water sources naturally restrict development from sprawling.
Purpose 2: To prevent Neighbouring Towns from merging into one another

4.10 **(Purpose 2a) Score 2:** The parcel serves ‘a largely essential gap between two or more settlements where the overall openness and scale of the gap is important to the restricting merging or protecting gaps involving other ‘inset’ Green Belt Settlements, but where limited development may be possible’. The parcel along with Adwick 1, 2 and 3 protects a land gap between the Small Urban Area of Carcroft and Skellow and Large Urban Area of Adwick Le Street.

4.11 The assessment notes that although it is a relatively narrow gap, there is sufficient visual and perceptual separation (alongside Adwick Le Street 1) that some development would not result in the merging, coalescence or significant erosion of a valued gap.

4.12 **(Purpose 2b) Score 0:** With respect to ribbon development, this means there are no instances or opportunities for ribbon development along Ings Lane as it does not provide direct access to any settlement.

4.13 As is the case with purpose 1, Flood Zone 3 to the south of the site and no further access along Ings Lane serve to prevent Adwick Le Street and Carcroft and Skellow from merging. Further to this, allocation of this site will not extend the built form of Skellow beyond existing development east of Ings Lane.

Purpose 3: To assist in Safeguarding the Countryside from Encroachment

4.14 **(Purpose 3a) Score 2:** In terms of sensitivity of the Green Belt, this area has *moderate to low sensitivity* to encroachment. The General Area therefore contains no distinctive components or features which are considered to be irreplaceable or rare. Land at this location was in a poor to fair condition: there was evidence of fly-tipping and open storage taking place along Ings Lane.

4.15 However, given that there is very limited built form within the General Area, development within the Green Belt could have a negative impact on the physical landform, and views (particularly if unscreened and located on the former spoil colliery).

4.16 **(Purpose 3b) Score 3:** In terms of the extent to which the land features have been impacted by encroachment, the area possesses moderately strong rural character. Whilst the land appears to have low levels of built form, it has evidence of urbanised uses that reduce the rural character of the general area.

4.17 The development limit of Skellow extends beyond the proposed allocation, therefore this site is not considered to encroach on the countryside as it is not extending the built form of Skellow beyond the present limit. The strong boundary features to the west and south of the site also serve to limit encroachment and screen the rural character of the area from urbanised uses. Positioning public open space to the south further limits encroachment into the Countryside by providing a gradual buffer from urban area to rural landscape.

Purpose 4: To preserve the setting and special character of historic towns

4.18 **(Purpose 4a) Score 1:** When assessing what role the general area has in supporting the character and views of historic towns, neither Adwick Le Street or Carcroft and Skellow are historic towns and therefore the parcel does not support this purpose.

4.19 **(Purpose 4b) Score 1:** There are no views of historic towns from the parcel and so the general area scores poorly when considering the role of supporting views into and out of historic towns.
4.20 Heritage assets in a town can be considered to have a positive contribution in providing setting and character to towns, to the point they become historic towns. The Heritage appraisal provided by Prospect Archaeology assesses historic considerations in relation to local heritage assets as well as archaeology and infers that development of the site, subject to design details will not affect the character or setting of heritage assets.

**Purpose 5: Assists in urban regeneration, by encouraging the recycling of derelict and other urban land**

4.21 **Score 3:** The parcel is considered to be contiguous with the Regeneration Area of Carcroft and Skellow and serves to direct development towards previously developed land inside the development limits. However, as established by the Council, although the site is in close proximity to the Carcroft and Skellow Regeneration Priority Area, large portions of urban land within Skellow are located in Flood Zones 2 and 3, making redevelopment of previously developed land unachievable.

4.22 As the Council has acknowledged the settlement lacks enough brownfield land to meet housing needs and Green Belt must be released for development, the site is considered to score equally with current housing allocation sites 165 & 186.

**View on Purposes**

4.23 Within the appraisal against Green Belt purposes it is considered that the site “performs poorly against the Local Interpretation of the Green Belt Purposes.”

4.24 In comparison Site 042 was assessed to have a moderate case for inclusion in further site selection work, with a mixed strength boundary and moderate scores for serving the purposes of the Green Belt. The site scores lower than site 042 in serving the purposes of the Green Belt and has moderately strong boundaries, therefore, it can be considered to have a moderately strong case for inclusion within further site selection work.

4.25 Also, the site is considered to score lower than current Skellow housing allocation sites 165 and 186, indicating they serve the purposes of the Green Belt more strongly.

**Conclusion**

4.26 Therefore a balance of national plan making policies and assessments from the Green Belt review should be measured when removing land from the Green Belt and allocating it for residential use. From the information provided through the ARUP Green Belt Review and Stage 3 site assessment Review, it can be considered the site should have the following grading:

> “Strong Case for inclusion within further Site Selection work: Strong Boundary and Weakly Performing against Green Belt Purposes”.
5.0 SUSTAINABILITY ASSESSMENT

5.01 A further part of the Council’s evidence base supporting the emerging Local Plan is a Sustainability Assessment of the whole plan and also of the individual sites. Table 8.20 summarises the results of the SA process for housing sites for Carcroft and Skellow. Within the narrative at pages 182-183 it summarises the settlement strategy for Carcroft and Skellow with a comparative assessment of the sites, alongside their capacity, to inform the selection of Proposed Housing Sites.

5.02 The exercise below replicates the assessment of the site in the context of the SA Objectives, informed by the specialist studies as listed at paragraph 1.5 above. It concludes with a narrative similar to that set out at Pages 182 and 183 of the SA, Based upon evidence from sections 3 & 4, the following sets out the main considerations supporting the allocation of land West of Ings Lane for residential development. A number of technical reports have been procured to provide additional evidence and clarification in relation to adverse impacts identified in the SA, issues such as Heritage, Access, Flooding and Mineral Safeguarding.

5.03 Furthermore, the site has been assessed against national policy relating to reviewing Green Belt boundaries and the need for sustainable development in line with relevant plan-making provisions of the NPPF (the Framework). It is considered that the principal issues are as follows:
   - Sustainability of the Site; and
   - Impacts of Development.

5.04 Each of these points will be addressed in turn below.

**Objective 1A (i) Loss of existing employment use**

5.05 This is a housing proposal which is not on land in employment use

Score = 0

**Objective 3A (i) Distance to Train Station**

5.06 Site lies over 1200 m from a train station at Adwick Interchange.

Score = -

**Objective 3A (ii) Distance to Bus Stop**

5.07 There are bus stops to the front of the Skellow Social Club, within 400m of the site giving access to a high frequency services.

Score = +

**Objective 3A (iii) Access to Cycle Network**

5.08 The site is within 100m of the identified cycle network, along Skellow Road

Score = +

**Objective 3B (i) Access to Existing Centre**

5.09 The site lies within 100m of a town or local centre District Centre on Skellow Road, immediately north of the site.

Score = ++

**Objective 3B (ii) Access to Primary School**

5.10 The site lies more than 800m walking distance to the nearest primary school.

Score = -
Objective 3B (iii) Access to Secondary School
5.11 The site lies within a walking distance of 1km to 2km of the nearest secondary school.
Score = 0

Objective 3B (iv) Access to GP
5.12 The site lies within 800m – 1.2km of a GP surgery.
Score = 0

Objective 5A (i) Affordability
5.13 At 80 units, the site will trigger provision of affordable and other subsidised housing; a contribution will be provided consistent with the prevailing policy.
Score = +

Objective 5D (i) Market Failure
5.14 This site does not represent a cleared housing site and is located within an attractive settlement to the north of Doncaster with good access to services, community facilities, jobs and the strategic highway network.
Score = 0

Objective 7B (i) Minimise Risk to Health and Safety
5.15 The site is located outside of a Health and Safety Executive Consultation Zone.
Score = +

Objective 8A (i) Encourage the Re-use of land and buildings
5.16 This is a green field site on the edge of an existing settlement. It has not been previously developed.
Score = 0

Objective 8A(ii) Contaminated Land
5.17 This site is not known to be on an area of known contamination
Score = 0

Objective 8A (iii) Landfill Sites
5.18 The site is located within an area identified as containing a closed land fill site.
Score = 0

Objective 8A (iv) Unstable Land
5.19 The site is not within a “Development High Risk Area”
Score = 0

Objective 8B (i) Highways Capacity
5.20 An access statement has been prepared which identifies that development of the site for 80 residential units will have no traffic impacts upon the strategic or local road network.
Score = +

Objective 8B (ii) Fibre Broadband Capacity
5.21 The site is in an area where fibre broadband and associated infrastructure will be in place by 2018.
Score = +

Objective 8B (iii) Primary School Capacity
5.22 Analysis of local primary school provision indicates that there is spare capacity in the region of more than 10% surplus of spaces
Score = +
Objective 8B (iv) Secondary School Capacity
5.23 Analysis of local secondary school provision indicates that there is limited capacity with a surplus of less than 5% of spaces.
Score = -

Objective 9A (i) Access to public open space
5.24 Evidence supporting the Local Plan suggests there is a shortfall in formal and informal open space in Skellow and Carcroft. It is anticipated that the scheme will result in the provision of an additional 1.35 ha of open space which will address the short fall in part.
Score = +

Objective 11A (i) Main River Flooding
5.25 Environment Agency mapping suggests that part of the site falls within FZ3a. However a detailed topographical survey and analysis by JPG engineers suggests the developable area of the site is within FZ1. As a consequence the proposal would result in development being located in FZ1, at the lowest level of risk of flooding.
Score = +

Objective 11A (ii) Surface Water Flooding
5.26 The site is not identified as being at risk from surface water flooding.
Score = +

Objective 11A (iii) Areas benefitting for Flood Defences
5.27 The proposal is in an area benefitting from flood defence works and is not at risk of main river flooding (FRZ1)
Score = +

Objective 11A (iv) EA Flood Warning or Alert Area
5.28 The site falls within an EA flood warning or alert area or is not at risk of flooding (FRZ1).
Score = +

Objective 12A (i) Biodiversity
5.29 The site is in arable agricultural use, albeit currently fallow. It is outside all designated sites and buffers.
Score = 0

Objective 12B (i) Landscape Capacity
5.30 The site is located in D2 – Hampole Limestone River Valley of the Doncaster Landscape Character and Capacity Study (2007). Whilst the report acknowledges that the valley should be conserved, it notes there is moderate potential for mitigation of housing development. In particular, any development should not encroach on the valley floor or the watercourse (Old Ea Beck) and developers should ensure there are limited visual impacts and separation of settlements is maintained.

5.31 From the Green Belt assessment, it is concluded that strong boundary features with adequate screening have the ability to limit the visual impact as well as maintain separation of the settlements. Additionally, situating public open space in the south of this site restricts encroachment on the Old Ea Beck.
Score = 0

Objective 13A (i) Heritage Impacts
5.32 The north western part of the site abuts the boundary of the Butter Cross Conservation Area. There are two Grade II Listed barns within the visual envelope, albeit they have lost their original context following conversion to residential use, and further residential development in their curtilage. These matters are covered in detail in the accompanying Heritage Statement which suggests negligible indirect effect on the Buttercross Conservation
Area and the two listed barns in South Farm Drive. Consideration could be given to planting and sensitive design and materials to maintain/enhance the setting of the Conservation Area.

Score = 0

Objective 13B (i) Archaeology

5.33 A heritage appraisal has been produced by Prospect Archaeology, it concludes that whilst site has moderate potential to contain archaeological remains, notably of the Iron Age and Roman periods, there are no known assets that would be a constraint to development and further investigation of the archaeological potential could be dealt with through the planning process.

5.34 Archaeological remains should not represent a constraint to development and can be dealt with through the planning process.

Score = 0

Objective 14A (i) Minerals Sterilisation

5.35 A mineral safeguarding report produced by E3P has analysed local mineral policy and provided an in depth review for the purposes of the sustainability appraisal. The report concludes there is a clear and identified need for the residential development in the Borough and:

- The site interrelationship with highly sensitive receptors including adjacent residential housing and surface water features would preclude mineral extraction given that the environmental and physical impact are likely to be unacceptable;
- Limestone bedrock, which is safeguarded in the wider area surrounding Skellow, is not present across the entire site, with geological mapping identifying the absence of Limestone in the south of the site. The volume of mineral that could be viably extracted is therefore considered to be low, particularly once boundary mitigation is taken into consideration; and
- It is not anticipated that development of the site will cause sterilisation of this mineral as Limestone bedrock deposits cover an extensive area.

5.36 Based on the above, there is no conflict with Policy M4 and M5 as there is an overriding need for the housing development, mineral extraction cannot be achieved in an environmentally acceptable or likely economic manner.

Score = 0

Objective 14A (ii) Best and Most Versatile land

5.37 Assessment of the 2014 ALC Natural England Mapping for Yorkshire and the Humber suggests that the site falls within a general area of Grade 3 and Grade 2 land. It is likely therefore that the land will fall within the BMVL category 3a, although further survey work will be required. However, given the site is 2.5 ha (6.5 acres), should the site be grade 3a (BMVAL), the loss of it to development is considered not substantial and protection of BMVL under the NPPF only applies to substantial losses of land.

Score = 0

Objective 14B (i) Ground Water Source Protection

5.38 The site is located within the total catchment (Source Protection Zone 3) or further form a source.

Score = 0

Objective 14B (ii) Pollution to Surface Water Bodies

5.39 The site is located 25m or more from an identified surface water body.

Score = 0

Objective 14C (i) Air Quality
5.40 The site is located outside of any defined Air Quality Management Area or National Exceedance Area. 

*Score = 0*

**Sustainability of the Site**

5.41 On the basis of the preceding analysis of the site against the relevant sustainability appraisal objectives, the site is considered to rank better than other sites in Skellow and therefore represents a more sustainable solution given its proximity to local services and the ability to provide open space to overcome a recognised shortfall in provision in the locality.

5.42 Given the appraisal work we would suggest that the summary appraisal for this site should be incorporated into Table 8.25 Reasons for Selecting and Rejecting Potential Housing Sites and should include the following entry under the Service Town Village: Carcroft Skellow Section (currently at Page 182 of the Volume 1 SA Report):

5.43 Land West of Ings Lane, Skellow; Potential Number of New Homes = 80

5.44 Proposed Housing Site – there are significant constraints in the settlement in respect of flood risk and Green Belt. As such many of the development options have failed the flood risk sequential test. This site has been demonstrated not to be at risk. The Phase 3 Green Belt Review (see Section 4.0 of this report) identifies the site as having a Strong Case for inclusion in further site selection work.

5.45 This site provides the opportunity to deliver a proportion of the local housing requirement on a site close to the village centre along with public open space to address the current deficiencies in the locality.
6.0 CONCLUSION

6.01 Doncaster Council is preparing a new Local Plan that is in the early stages of preparation, currently an adoption in late 2020 is anticipated. Through its Plan, the Council seeks to facilitate the delivery of at least 920 (net) new homes each year over the plan period 2015-2032. Consideration needs to be given to a framework compliant plan with end date at least 15 years from adoption.

6.02 In terms of the spatial strategy, Carcroft and Skellow is designated in the settlement hierarchy as one of the largest of ten service towns, capable of accommodating a minimum of 250 dwellings over the plan period. Given an indicative density of 32 dwellings per hectare, a possible capacity of 80 dwellings is achievable. The site is capable of delivering up to 1.35 ha of public open space, which will go a long way to addressing the identified local shortfall.

6.03 This site was not submitted to the most recent consultation on sites (October 2018) as a promoter had not been appointed. Topographical surveys and a detailed assessment demonstrate that the site is FRZ1, at no risk of flooding; confirmation is awaited from the EA on this point. As that position has been clarified and the emerging Plan is at an early stage, this site is submitted for further assessment as a draft housing allocation.

6.04 In delivering the spatial strategy, the Council has acknowledged Carcroft and Skellow lacks enough brownfield or greenfield sites within the development limit to meet identified needs over the plan period, therefore exceptional circumstances exist for releasing Green Belt. As part of the evidence base, the Council has commissioned a Green Belt Review to assess potential development sites.

6.05 Having considered the contents and methodology of that Green Belt Review, an assessment of the site (as evidenced in section 4) suggests it is appropriate for removal from the Green Belt as a housing site and that a permanent and recognisable Green Belt boundary can be established using the strong tree belt to the west and well-defined mature hedge line to the south, compliant with NPPF 139 (f), regarding clearly defined boundaries that are recognisable. Although development of the site has potential to affect views to and from the adjoining countryside, the site’s containment and strong boundary limit this relationship. Situating public open space south of the site further preserves the Green Belt by maintaining a gap between Skellow and Adwick-Le-Street.

6.06 The assessment against SA objectives in section 5, informed by additional technical reports provides a clear breakdown of the site compared to the nine Skellow sites assessed in Table 8.20, at pg 130 of the Sustainability appraisal. It is considered the site has scored better on numerous objectives, and where it has scored poorly, so have the alternative sites in Skellow; therefore the site is considered a better housing site in respect of the SA.

6.07 Sites 165 and 186 are a substantial distance from the local centre in Skellow, Land West of Ings Lane is considered to be in a more sustainable location, creating a logical and efficient rounding off of Skellow although sites 186 and 165 could complement the site in providing adequate housing growth. A need for sustainable development forms the core of the NPPF and sites within the Green Belt that are sustainable and deliverable within the plan period should be considered for removal first before sites that are not as sustainable.

6.08 To summarise, on the basis of limited harm to the Green Belt and taking account of identified housing needs with sustainable development being central to the plan-making process, exceptional circumstances exist to justify removal of the site from the Green Belt and inclusion as a housing allocation, compliant with the NPPF (2019).

6.09 Further to this, the site is immediately available and deliverable with a keen landowner and a draft promotion agreement agreed with a regional promoter. The NPPF (2019) places large emphasis on smaller sites that can deliver housing quickly and seek to diversify housing within residential market areas. Therefore, it should be included for further assessment as a preferred housing allocation within the emerging Doncaster Local Plan.

CARTER JONAS
APRIL 2019
Accessibility of the site has been appraised by Optima Highways (2019). Consideration has been given to walking/cycling and public transport accessibility, however the site is also accessible by private car within close proximity of the A1 motorway and Skellow Road (B1220).

It is immediately adjacent to the southern edge of Skellow, within walking distance of a range of existing essential services and facilities (minutes) as seen by figure 2 below:

5 minute walk from the site:

- Two local convenience stores;
- Newsagents;
- Post Office;
- Bakery;
- Barbers & hairdressers;
- Pharmacy;
- Dental practices; and
- Takeaways and cafes.

10-15 minute walk from site:

- Owston Park Primary is the closest primary school; and
- Larger food stores including Iceland and Asda.

15-20 minute walk from site:

- Carcroft Primary School; and
- The closest GP surgery.

- Within a 25 minute walk towards Adwick Le Street there are multiple employment opportunities at Carcroft Enterprise Park and Wellsyke Industrial Estate.

The majority of Skellow is located within a 5 minute cycle journey of the site, however additional employment opportunities and facilities are located within the area:

- Employment opportunities within Redhouse Interchange, Carcroft Enterprise Park and Wellsyke industrial Estate are within a 15 minute cycle journey;
- Adwick Interchange can be accessed within a 15-20 minute journey by bike;
- Outwood Academy, Adwick can be accessed within a 20-25 minute bike ride; and
- From the Site a 30 minute catchment area includes Skellow, Carcroft, Askern, Bentley and Adwick Le Street.
The services along Skellow Road provide up to 8 buses per hour (two way) Monday to Friday between Cantley, Doncaster and Askern (Instoneville).

Indicative bus journey times to nearby destinations are as follows:

- Adwick Interchange – 5 minutes via bus service 50;
- Adwick le Street – 9 minutes via bus service 51;
- Bentley – 14 minutes via bus service 51;
- Askern – 18 minutes via bus service 51a; and
- Doncaster – 28 minutes via bus services 51.

Adwick Interchange (AWK) is located approximately 2.5km south east of the Site off Adwick Lane. There are lit footways leading to the station and both cycle and car parking facilities are provided. Adwick Interchange provides regular services to Leeds, Doncaster, Wakefield and Sheffield.

Approximate journey times are as follows:

- Doncaster – 11 minutes;
- Wakefield (Westgate) – 21 minutes;
- Leeds – 38 minutes; and
- Sheffield – 50 minutes.

Each of these destinations (as well as others) provides accessibility to significant employment, leisure and retail opportunities beyond the immediate local area.
APPENDIX 2: PREVIOUS REPRESENTATIONS
Dear Jonathan,

DONCASTER MBC EMERGING LOCAL PLAN: CALL FOR SITES SUBMISSION IN SUPPORT OF DRAFT HOUSING ALLOCATION ON LAND WEST OF INGS LANE, SKELLOW, DN6 8JL.

Further to our email correspondence, Carter Jonas LLP instructed by our client, KCS Developments Ltd wish to submit a site for consideration in the emerging Local Plan to be removed from the Green Belt and included as a draft housing allocation.

Located in Carcroft-Skellow, which is identified as one of 10 Service Towns/Villages in the borough from the emerging Doncaster Local Plan. The Homes & Settlements consultation (March 2016) proposed a housing allocation to the town of 255 new homes over the plan period to 2032. The latest, and most up-to-date evidence base, now proposes a slightly lower target for Carcroft-Skellow of 250 new homes during this same timeframe. As seen from the site location plan below, the site is approximately 2.5 Ha (6.5 acres) in size, and lies south of Skellow Road (B1220), adjacent to Ings Lane on the eastern boundary.

21 January 2019
Currently, the land is generic pasture, formed of overgrown grass with a mix of thick woodland and hedging that forms a protective border around the site. The entire site is gently sloping with no obvious technical hurdles, both Ings Lane to the east and South Farm Drive to the north-west directly adjoin the property and are adopted highways, a further Local Authority search has confirmed the site is not crossed by any Public Rights of Way.

Flood modelling carried out by JGP Group using 2018 Environment Agency data and a detailed topographical site survey has confirmed the entire site is located in Flood Zone 1, this is evidenced in a supporting map that highlights the difference in location between modelling from JGP and the Environment Agency when assessing the extent of Flood Zone 3. The Environment Agency’s flood mapping application is based on Ordnance Survey’s OS VectorMap, this data is to the nearest contour line, these are spread 10m apart and therefore EA mapping can only provide an indicative boundary, whereas JGP have modelled Environment Agency data with an up to date detailed site survey to deliver an accurate representation of flood risk on the site. Therefore we consider the Flood Zone 1 boundary using JGP Group’s analysis of 2018 EA data acceptable and further assessment of this data will be provided to assist the Council’s site selection methodology process for this site.

Of particular note is our client’s decision to instruct solicitors, and agree a promotion agreement with the landowners, emphasising intent to progress this site through the Local Plan. This agreement holds a time-specific clause, therefore the land is considered immediately available and inclusion of the site as a housing allocation will be acted upon by all interested parties.

It is our intention that the site be included for consideration within the emerging Local Plan as a draft housing allocation for Carcroft-Skellow, given an indicative dwellings per hectare density of 30 units, we calculate a possible capacity of 75 houses. Furthermore the site constitutes effective rounding off of Skellow, with the potential to deliver homes promptly in a sustainable location close to the centre. Previous experience in delivering sites of this nature and size suggests that, if removed from the Green Belt it would take perhaps 9 months to secure a planning consent which would allow development to commence. In terms of delivering the entire site this would be approximately 2 years from starting construction to the sale of the final house in one single phase.

The site has very few limitations that would restrict development other than being washed over with a Green Belt designation, although we consider that the site performs weakly in protecting the Green Belt as evidenced in the stage 3 Green Belt Review by site 42, a neighbouring site immediately to the west. Additionally, this site maintains the characteristics of the tightly drawn Green Belt surrounding Carcroft-Skellow far more so than the provisional housing allocations of sites 165 and 186 to the west of the settlement. These two sites (also in the Green Belt) are provisionally accepted because they are not at risk of flooding, the site we are proposing is neither at risk of flooding, nor within close proximity to the A1 motorway, which may negatively impact residential amenity. Therefore, we reflect that this site is as appropriate, if not more so for residential development than other sites under deliberation.

To summarise, the site is immediately available and suitable for development with few restrictions. The NPPF (2018) places a large emphasis on smaller sites that can deliver housing quickly and seeks to diversify the variety of housing within residential market areas. The removal of the Green Belt designation and inclusion of this site as a draft housing allocation conforms to the aspirations of the NPPF (2018) and creates a logical and efficient extension of the settlement.

Please do not hesitate to contact me should you have any queries.
Yours Sincerely,

Joel Gandhi
Graduate Planner

E: Joel.gandhi@carterjonas.co.uk
T: 0113 203 1074
M: 07920 543382
Please find attached representation on behalf of KCS Developments Ltd for the removal of land from the Green Belt and allocation for housing to the west of Ings Lane, Skellow. To support these proposals the following are included with this representation:

- Appendix 1 SK01A Site Layout Plan
- Appendix 2 SK03 Site Plan

A number of separate technical papers are also submitted for information:

- Site Promotion Document (Carter Jonas) (Second Email)
- Heritage Impact Assessment (Prospect Archaeology) (Second Email)
- Access Appraisal (Optima Highways)
- Coal Authority Report

A copy of the representation form is also included (Second Email).

We would be grateful for a formal acknowledgement of receipt and look forward to working with the Council to bring these proposals forward.

Paul Leeming MRTPI
Associate, Partner

Carter Jonas

First Floor, 9 Bond Court, Leeds, LS1 2JZ
30th September 2019

Dear Jonathan,

DONCASTER PUBLICATION DRAFT LOCAL PLAN CONSULTATION, AUGUST AND SEPTEMBER 2019 - LAND WEST OF INGS LANE, SKELLOW, DN6 8JL

Further to email correspondence, Carter Jonas LLP is instructed by our client, KCS Developments Ltd, to submit representation to the Doncaster Publication Draft Local Plan (the DLP) regarding the development strategy for the settlement of Carcroft-Skellow, in particular the delivery of housing growth over the Plan period.

A Site Promotional Document was issued to the Council in April 2019 identifying the site specific matters, availability and suitability of the land in question to the West of Ings Lane, Skellow, in particular the ability to deliver up to 80 dwellings, in close proximity to the village centre. A copy of that document is attached to this representation along with other technical and environmental reports as listed in the text below.

Since the preparation of those documents further work has been undertaken with respect to flood risk and this representation sets out the consequences of that additional work and how it ties with the Local Plan strategy.

To inform this representation two plans are attached as Appendices

- Appendix 1 SK01A Site Layout Plan
- Appendix 2 SK03 Site Plan

A number of separate technical papers are also submitted for information:

- Site Promotion Document (Carter Jonas)
- Access Appraisal (Optima Highways)
- Heritage Impact Assessment (Prospect Archaeology)
- Coal Authority Report
Progress of the Local Plan

Doncaster Council published a revised Local Development Scheme (LDS) which suggests that a draft version of the Plan would be submitted in Late Autumn 2019 with the Inspector’s Report in Spring 2020 following an Examination in Public. On balance we consider that the timescale set out in that document is optimistic, and the Council should anticipate that the adoption may be delayed into 2021.

Soundness

Given the stage of progress of the DLP, Paragraph 35 of the Framework requires Plans submitted for examination to be prepared in accordance with legal and procedural requirements and meet the four tests of ‘soundness’ for Local Plans to be:

- Positively prepared;
- Justified;
- Effective; and
- Consistent with National Policy.

Plan Period

Consultation on the Local Plan during October 2018 suggested the plan period would comprise 2015 to 2032, a seventeen year plan period. The current draft plan suggests an extension of the plan period for the period 2015 to 2035, it is welcomed that the Council has moved the Plan period forward as this acknowledges the particular issue we raise. Nevertheless, such an approach is unsound as it is not consistent with policies in the Framework and is not planning positively.

To address this point, we consider that the Council should review the plan period bearing in mind the requirements of with paragraph 22 of the Framework which requires that “strategic policies should look ahead over a minimum period of 15 years from adoption”. This requirement is set out in the Framework specifically to identify and respond to long term development requirements and opportunities (in particular improvements to infrastructure). A similar consideration also applies where a review of the Green Belt is required, as is the case to deliver the Doncaster Local Plan. The Framework suggests at paragraph 139 that longer term requirements should be identified for beyond the plan period in the form of safeguarded land.

In light of our comments on the LDS above, we consider that the Council should extend the plan period to 2037 to take into account the Framework requirements and as a prudent approach should there be further slippage to the progress of the DLP.

Policy 1: Presumption in Favour of Sustainable Development (Strategic Policy)

We welcome and support Policy 1. It is considered to be integral to ensuring that the growth of the Borough is sustainable and improves the economic, social and environmental conditions of the area.

Policy 2: Spatial Strategy and Settlement Hierarchy (Strategic Policy)

Policy 2 is also welcomed and aligns with the settlement hierarchy for the Borough and the presumption in favour of sustainable development. The inclusion of Skellow as one of 10 Service Towns and Villages is welcomed with the expectation that this tier of the hierarchy will accommodate some 10% of the District’s housing needs. As an observation it would be appropriate for the Local Plan to maintain consistency, as in certain sections of the document it refers to this tier as “Larger” Villages.
Within the policy it suggests that new development (allocations) will be distributed on a pro-rata basis to the most sustainable locations taking a sequential approach to flood risk. Such an approach is supported where the flood zones are accurately recorded and up-to-date. We return to this issue in relation to Skellow later in this representation.

Policy 3: Level and Distribution of Growth (Strategic Policy)

As a strategic policy the wording is split into two parts - identifying the District wide development needs followed by an indication of the distribution of development across the each tier of the settlement hierarchy along with the identification of a quantum for each defined settlement.

Policy Preamble

For housing the policy seeks to deliver 18,400 dwellings for the period 2015 to 2035, based on a need of 920 dwellings per annum. In the first instance, we would suggest that the policy should be set out to be similar in vein to the employment policy to suggest a level of provision. As currently stated the requirement seems to suggest that this is a target (maximum) rather than a starting point. To address this, we would suggest the policy wording starts:

“at least **** new homes”.

Also in line with our comments above regarding the plan period we would suggest the plan period is phrased as:

“2015 – 2037”.

Furthermore it is not clear how the housing and allocation proposals take into consideration non-delivery, where sites do not come forward, or do not deliver the quantum of housing anticipated through the indicative yields set out in the individual allocations. Officers at the Council may wish to have regard to recent events in Kirklees where a number of allocated sites are not delivering the housing numbers indicated in the adopted Local Plan; particularly once detailed site investigations have been carried out in support of formal planning applications.

To reflect these matters the Local Plan Expert Group and the housebuilding industry (through the HBF et al) recommend, that when allocating sites, a buffer is built in amounting to an additional 20% over the identified housing requirement. It would be appropriate for this policy to reflect on this matter to set an appropriate policy hook for the draft housing allocations at Policy 6. Policy 3 could state that:

“Site allocations in Policy 6 will seek to identify a 20% buffer above the net housing requirement in order to achieve a level of flexibility over the plan period.”

Housing Requirement

Turning to the housing numbers we note the Council continues to identify a net housing requirement of 920 dwellings per annum (dpa) over the plan period 2015-2035. Paragraph 60 of the Framework states that ‘to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals’.

It is considered that the housing requirement is not consistent with the level of local housing need (LHN) using the Standard Methodology as set out in PPG. There is also a disjoint between the economic growth aspirations and the housing provisions in the Local Plan requirement. In effect the employment
land requirement is expressed as a minimum whereas the housing requirement is a target; as a consequence limiting the housing numbers will act as a brake on the economic growth aspirations. Such an approach does not represent positive planning, so is unsound:

Reflecting on the Standard Method, it should be noted that it identifies a minimum annual housing need figure, it does not produce a housing requirement figure. This requires consideration of a range of adjustment factors including annual average household growth, affordability and economic growth factors. Noting the comment above on Local Plan housing figures acting as a brake on economic growth the Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The Standard Method provides a minimum starting point, and there may be circumstances where it is appropriate to consider whether the actual housing need is higher than the Standard Method indicates. PPG (ID: 2a-010) goes on to state that these circumstances can include growth strategies for the area; strategic infrastructure improvements; previous levels of delivery; or where previous assessments of need are significantly greater than the outcome from the Standard Method.

Doncaster Council commissioned Peter Brett Associates to produce the Economic Forecasts and Housing Needs Assessment 2018 which identifies a demographic starting point from the 2014-based household projections of 562dpa. If adjusted to match a “business as usual” job forecast would equate to 579dpa. However, to match the jobs growth aspiration of the Sheffield City Region it identifies a jobs-led housing need of 1,073dpa. Therefore, it is clearly apparent that there are circumstances identified that would require a housing figure significantly greater than the outcome of the Standard Method.

From the above we do not consider that the local housing need produced from the Standard Method would provide an appropriate housing requirement, it is evident that the actual housing requirement should be higher. Also it would not be appropriate to limit the housing requirement at the top end of the range either. We do not consider that this would be consistent with the Framework’s requirement to support the Government’s objective to boost the supply of homes.

Taking these matters into consideration we would suggest that the Local Plan should provide for a minimum net requirement of 1,100 dwellings per annum. This translates to a minimum requirement to 2037 of 24,200 dwellings; around 6,000 units more than the Publication draft Policy. Furthermore in considering the allocation of housing and mixed use sites we suggest that the Plan seeks to identify sufficient land for 29,400 dwellings, minus any supply from the years 2015 to 2019/20.

Turning to the second part of the Policy which distributes development across the settlement hierarchy, for the Service Towns and (Larger) Villages, the policy suggests these accommodate “about 10% of the Borough’s requirement”. We have no comment upon this as an indicative approach, but would suggest that the requirement for each settlement is not prescriptive as set out in the current policy wording. It is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels.

Carcroft-Skellow

Within the DLP the evidence base for Carcroft-Skellow identifies the town as one of the most sustainable settlements within this tier of the settlement hierarchy. We agree with this analysis. It follows therefore that any increase in the housing requirement or the need to identify buffer sites that first consideration is given to Carcroft-Skellow.
Based on the analysis above we consider Service Towns and Villages should accommodate between 2,420 and 2,940 dwellings over the plan period. Accordingly the requirement for Carcroft-Skellow that the housing requirement is increased proportionately. When considered against the provisions of Policy 2 which allows for windfall development in and on the edge of the selected settlements this would provide a sound policy approach.

**Policy 6: Housing Allocations (Strategic Policy)**

It is important that the levels of development proposed for each settlement is informed by appropriate analysis of the deliverability and viability of the sites. It is no use continually promoting growth in locations if there is little or no prospect of them being brought forward.

Specific allocations for Carcroft and Skellow are referred to in a series of subsequent tables; Table H1(M) indicates housing allocations with planning permission (at 1st April 2018); Table H2(N) identifies Housing Allocations without planning permission (at 1st April 2018); and Table H3 (E) identifies reserve development sites. The tables themselves are contained in Chapter 16. Chapter 16 paragraphs 16.195 to 16.205 set out the settlement specific approach to Carcroft-Skellow.

Within the explanatory text (para 16.195) it suggests that Carcroft-Skellow is the largest settlement in the Service Towns and Villages tier of the settlement hierarchy, with a good level of services and access to services in Adwick Woodlands. Paragraph 16.197 acknowledges the settlement is tightly bound by Green Belt and extensive areas are also covered by flood zone.

Over the Plan period, paragraphs 16.198 and 199 explain the settlement function and role of Carcroft Skellow identifying the housing requirement (of 250 units) over the Plan period to meet its baseline (local needs) requirement of 16 units per year. Our comments on the housing requirement (Policy 3) are highlighted above suggesting an increase over the Plan period along with a settlement specific figure (in a range) for Carcroft-Skellow.

As justified at paragraph 16.198 the approach to Carcroft-Skellow would appear fundamentally unsound, as it does not represent “positive planning”. If one accepts the 16 dwellings per year as a minimum, this would suggest that over the 20 year plan period as set out in the Publication DLP a minimum requirement of 320 dwellings. If as we suggest the Plan period is extended by two years to accord with the Framework there would be a minimum requirement of 352 dwellings. Furthermore as we explain the housing requirement should increase along with the inclusion of a 20% buffer for non delivery. This would suggest a minimum requirement for Carcroft-Skellow of around 425 to 450 dwellings over the Plan period to be identified through site allocations.

Paragraphs 16.203 to 16.205 set out the approach to housing allocations in the settlement. Broadly we accept the approach outlined in the DLP that in the absence of opportunities within the defined urban area exceptional circumstances are demonstrated such that it is necessary to review the Green Belt around the settlement and for land to be removed from the Green Belt. We suggest that land at Ings Lane falls into this category.

Existing supply [Table H1(M) at 01/04/2019] relates to a single commitment for 7no. dwellings at Suite Express House (Site Reference 1076). That being the case, we agree with the approach of the Council to allocate land to provide housing during the Plan period along with a reserve site to be brought forward should the main allocation not deliver at the appropriate rate.
H2(N) Land at Crabgate Lane, Skellow

Paragraph 16.204 supplemented by Table H2(N) indicates the single site allocation (Sites 165 and 186) for land of Crabgate Lane. Totalling 15.1 hectares, the indicative capacity achieves 300 dwellings, assuming areas of lower density and/or buffer zones adjacent the A1(M) to mitigate concerns of noise generated by traffic. Being prudent, we would question the ability of the Crabgate Lane site to deliver the dwelling numbers as set out in Table H2(N). This states that the site will deliver 175 units over a five year period; i.e. 35 units per year. We would suggest that a delivery of 25 units per year is feasible, reflecting the yield for the following five year period. This would suggest that a number of the units will be delivered beyond the Plan period.

H3(E) Owston Road, Carcroft (Reserve Site)

A reserve development site is identified at Table H3(E) off Owston Road, Carcroft comprising 3.3has of land with an indicative capacity of 93 dwellings. Text at paragraph 16.205 indicates the suitability of this site is questionable given flood risk constraints. It states that the flood risk constraints have not been met through the planmaking stage, suggesting that these will be dealt with through any subsequent planning application. In our view it is an unsound consideration if it is not demonstrated that the site is suitable for a vulnerable use such as housing.

It is notable that the Owston Road site remains an allocation from the 2001 -16 Unitary Development Plan, marked on the Proposals Map and listed under saved Policy PH1 (Page114) as PH1 (3/15) Land at Owston Road, Carcroft extending to 3.4has to deliver 84 dwellings. It is clear from the Council’s Public Access that there has been little developer interest in the site. We would question therefore whether it is a suitable and deliverable site given that it has been identified as available for at least two decades.

In light of the above we have fundamental concerns with regard to the Settlement Strategy for Carcroft-Skellow, where the Council is seeking to not meet the demonstrable requirement set out in its own plan. In attempting to meet that suppressed requirement, it reasonable to state that one of the identified sites at Owston Road, Carcroft is not suitable or deliverable.

Land at Ings Lane, Skellow

To address this concern we recommend that the Council should identify more land including further releases from the Green Belt. We consider that land to the west of Ings Lane, Skellow is a suitable and deliverable site. The site proposed for removal from the Green Belt is identified at Appendix 1 with a gross site area of 4.2ha. The boundaries would follow well defined hedgerow features. At Appendix 2 is a drawing indicating how much land is proposed for housing at this stage, extending to 1.5has, with a yield of 51 dwellings. A further area of around 1.0ha is currently the subject of further discussion with the Environment Agency to agree that it is not at risk of flooding. In the present circumstances this additional area is submitted as potential reserve land (in effect, safeguarded) at this stage.

Details within the attached promotional document (which has been submitted to the Council previously) demonstrates how the larger site is available, suitable and achievable, capable of delivering around 75 dwellings (@30dph). This scale of development is considered proportionate to the village’s housing requirement. The site is in close proximity to the village centre and a level 100m walk to bus stops.

Currently, the land is laid to pasture, formed of overgrown grass with a mix of thick woodland and hedging that forms a protective border around the site. The entire site is gently sloping with no obvious
technical hurdles, both Ings Lane to the east and South Farm Drive to the north-west directly adjoin the property and are adopted highways, a further Local Authority search has confirmed the site is not crossed by any Public Rights of Way.

Flood modelling carried out by JGP Group using 2018 Environment Agency data and a detailed topographical site survey has confirmed the entire site is located in Flood Zone 1, this is evidenced in a supporting map that highlights the difference in location between modelling from JGP and the Environment Agency when assessing the extent of Flood Zone 3. The Environment Agency's flood mapping application is based on Ordnance Survey's OS VectorMap, this data is to the nearest contour line, these are spread 10m apart and therefore EA mapping can only provide an indicative boundary, whereas JGP have modelled Environment Agency data with an up to date detailed site survey to deliver an accurate representation of flood risk on the site. Therefore we consider the Flood Zone 1 boundary using JGP Group’s analysis of 2018 EA data acceptable and further assessment of this data will be provided to assist the Council's site selection methodology process for this site.

The site has very few limitations that would restrict development other than being washed over with a Green Belt designation. The Council has already accepted that there are exceptional circumstances for removing land from the Green Belt. As set out in the attached promotional document we consider that the site performs weakly in protecting the Green Belt as evidenced in the Stage 3 Green Belt Review by site 42, a comparative neighbouring site immediately to the west. Additionally, this site maintains the characteristics of the tightly drawn Green Belt surrounding Carcroft-Skellow far more so than the provisional housing allocations of sites 165 and 186 at Crab Green Lane to the west of the settlement. These two sites (also in the Green Belt) are provisionally accepted because they are not at risk of flooding, the site we are proposing is neither at risk of flooding, nor within close proximity to the A1 motorway, which may negatively impact residential amenity. Therefore, we reflect that this site is as appropriate, if not more so for residential development than other sites under deliberation.

To summarise, the site is immediately available and suitable for development with few restrictions. The Framework places a large emphasis on smaller sites that can deliver housing quickly and seeks to diversify the variety of housing within residential market areas. The removal of the Green Belt designation and inclusion of this site as a draft housing allocation conforms to the aspirations of the NPPF (2018) and creates a logical and efficient extension of the settlement.

In order to assist the Council in its consideration of this site, in addition to the Promotion Document, the following reports are also included with this representation submission:

- Access Appraisal (Optima Highways)
- Heritage Impact Assessment (Prospect Archaeology)
- Coal Authority Report

Within reason, further reports will be commissioned should they be required to facilitate the Council's consideration of this proposal.

**Policy 8: Delivering the necessary range of housing (Strategic Policy)**

We are of the view that this strategic policy as presently drafted is not considered to be sound as it is not justified or consistent with national policy for the following reasons:
Housing Mix

Whilst there is the need for a mix of house sizes, type, price and tenure and is generally supportive of providing a range and choice of homes to meet the needs and market demand in the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements or the need to provide significant amounts of additional evidence.

We recommend (along with others) that a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location.

It is also important to highlight the need for creating a housing market that will attract investors to Doncaster, and to provide an element of aspiration to ensure working people and families are retained within the area. To this end the Council should recognise that the latest Housing Need Assessment will only ever identify current deficits and reflects a snap-shot in time. Therefore, even the latest HNA may not reflect the position at the time of an application. It is important that there is greater flexibility within this policy to acknowledge that the mix can vary both geographically and over the plan period.

Affordable Housing

This policy requires housing sites of 15 or more homes in the Borough’s high value housing market areas to include 23% affordable homes and for 15% of affordable in other areas.

There is no dispute about the need for affordable housing within Doncaster and the need to address the affordable housing requirements of the borough. Provisions within the Framework are, however, clear that the derivation of affordable housing policies must not only take account of need but also viability. Paragraph 34 establishes the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened.

The Whole Plan Viability Testing (2019) report shows the issues of viability for a number of sites. It shows that schemes in the low value areas are not viable and will not be able to support the affordable housing requirement.

The Council should be mindful that it is unrealistic to negotiate every site on a one by one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery. Therefore, site by site negotiations on these sites should occur occasionally rather than routinely.

Policy 29: Open Space Provision in New Developments

We consider this policy not to be sound as it is not justified or consistent with national policy.

This policy looks for residential developments to provide open space to address local green space needs and deficiencies. Overall, there is support for the drive towards incorporating additional green space within new communities on health and well-being grounds. However, developers should only be expected to provide for those facilities which are made necessary by the development proposed and not simply in order to make up for existing deficiencies in provision or provide benefits for the community at large. It should also be acknowledged that this may have a knock-on effect on housing density and the need for additional land to be allocated for new development.
Policy 67: Development Viability (Strategic Policy)

This policy is not considered to be sound as it is not consistent with national policy. There may be some circumstances where this policy and the use of trigger points can be utilised to bring forward the delivery of homes. However, we have significant concerns around the implementation of this policy and how frequently it will be used. Simply put, the use of trigger points could add further burdens to any developer who will need to reproduce viability assessments at a potentially regular basis, going against Government initiatives which are looking to reduce the need for viability assessments. This policy causes unnecessary uncertainty and additional risk for developers, and that could become an impediment to the development process.

Conclusions

Doncaster Council should be congratulated for progressing the Local Plan to this stage. We do raise concerns however, that the slippage in progress may have unintended consequences for the need to introduce further changes. For example this may result in an extension to the Plan period to ensure consistency with national policy; i.e., a minimum 15 year plan period from the date of adoption.

We have raised concerns regarding the housing requirement identified and the disjoint with the economic development policies. In blunt terms a failure to adequately address local housing needs will act as brake upon economic growth aspirations. We have suggested that the housing requirement be increase accordingly, and stated as a minimum.

With regards delivering growth it is welcomed that the Council recognise that exceptional circumstances have been demonstrated requiring the release of land from the Green Belt. In doing so however, we have concerns regarding the approach to the settlement of Carcroft-Skellow as set out in this version of the Local Plan.

It is our view that the spatial strategy fails to meet the basic requirement for the settlement. It is welcomed the Council recognise the need to review the Green Belt boundary around the town and allocate land. However, it is considered that the main site off Crabtree Lane, may not deliver the number of dwellings proposed across the Local Plan. Furthermore the Council has identified a reserve site which is carried forward from the UDP. That site off Owston, Road Carcroft is identified within a flood risk zone (a matter which has not been addressed through the plan making process). Furthermore given that that particular site has been allocated for some 20 years it is questioned whether it is deliverable.

In these circumstances we suggest that land to the west of Ings Lane, Skellow is removed from the Green Belt in its entirety and allocated for the delivery of up to 51 dwellings in the early part of the Plan period. Layouts attached as Appendices 1 and 2 to this representation indicates how the site may come forward. Additionally a Promotion Document has been prepared by Carter Jonas which has been submitted to the Council previously, but is contained as part of this representation along with a number of other technical and environmental studies to assist the Council in the consideration of this additional sustainable site.

Further Engagement

We trust that the Council will find these comments useful as it continues to progress its Local Plan. We would welcome the opportunity to discuss the plan wide issue as well as matters relating specifically to the site off Ings Lane, Skellow.
We would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Please do not hesitate to contact me should you have any queries.

Yours faithfully,

Paul Leeming

Town Planner

E:

T:

M:
APPENDIX 1

EXTENT OF LAND FOR REMOVAL FROM GREEN BELT

(ELLIS HEALEY DRAWING 1853 SK01A SITE LAYOUT)
Schedule of accommodation

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>2 bed dwelling</td>
<td>20 no.</td>
</tr>
<tr>
<td>3 bed dwelling</td>
<td>18 no.</td>
</tr>
<tr>
<td>4 bed dwelling</td>
<td>13 no.</td>
</tr>
<tr>
<td>Total</td>
<td>Subtotal</td>
</tr>
</tbody>
</table>

Site area - 4.2 Ha
Nett Developable area - 1.5 Ha
APPENDIX 2

AREA OF LAND TO BE ALLOCATED

(ELLIS HEALEY DRAWING SK03)
Area of land to be allocated

Existing Line of flood zone 1

Area of land to be brought forward as protected area of search depending on the outcome of discussions on the extent of flood zone
APPENDIX 3: TIMELINE OF LOCAL AUTHORITY ENGAGEMENT
## Appendix 3 – LPA engagement schedule

<table>
<thead>
<tr>
<th>Date</th>
<th>Type of Engagement</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>July 2018</strong></td>
<td>Emails exchanged with Doncaster Local Plans Team - Call for Sites Pro Forma</td>
<td>Discussion over the availability of the Call for Sites forms</td>
</tr>
<tr>
<td><strong>February 2019</strong></td>
<td>Emails exchanged to Doncaster Planning Team</td>
<td>Discussion of a Pre-app meeting with a view to submitting a planning application on the site</td>
</tr>
<tr>
<td><strong>February 2019</strong></td>
<td>Emails exchanged with Doncaster Policy Team for Local Plan Site Representation</td>
<td>Submitted a request for clarification under the Freedom of Information Act 2000</td>
</tr>
<tr>
<td><strong>April 2019</strong></td>
<td>Submission of site following site representations in January and February 2019.</td>
<td>Submission included: a site promotional document (including an analysis of the Green Belt Review) with additional technical reports</td>
</tr>
<tr>
<td><strong>May 2019</strong></td>
<td>Email with Doncaster Policy Team</td>
<td>Discussion over site submission and Local Plan progression</td>
</tr>
<tr>
<td><strong>November 2019 &amp; January 2020</strong></td>
<td>Emails covering Doncaster Flood Review</td>
<td>Discussion over the site in the context of flooding and progress of the Local Plan.</td>
</tr>
<tr>
<td><strong>January 2020</strong></td>
<td>Emails exchanged for Local Plan Site Representation</td>
<td>Submission included flood risk map and letter of submission</td>
</tr>
<tr>
<td><strong>January 2020</strong></td>
<td>Email response from Doncaster Council</td>
<td>Following response from the site submission. It notes they will keep your site on file and incorporate into the evidence base at the earliest opportunity.</td>
</tr>
<tr>
<td><strong>January 2020</strong></td>
<td>Doncaster Flood Review</td>
<td>Email exchanges discussing Doncaster Flood Review.</td>
</tr>
<tr>
<td><strong>March 2020</strong></td>
<td>Letter to Doncaster Civic Office</td>
<td>A letter sent to the council asking whether any of the sites which are currently passing through the Local Plan as preferred allocations were subject to inundation during the flooding events in of late 2019 and any amendments deemed necessary to the Local Plan process</td>
</tr>
<tr>
<td><strong>March 2020</strong></td>
<td>Local Councillors letter of support submitted to policy officers on the 30th of March 2020.</td>
<td>Letter sent to Jonathan Clarke regarding proposals on land at Ings Lane.</td>
</tr>
<tr>
<td><strong>May 2020</strong></td>
<td>Skellow Flood Zone Review</td>
<td>Progress report for Skellow Flood Zone Review. A confirmation letter from the Environment Agency for the Evidence Review Request for the Flood Map and a map showing the site and proposed flood zones. Supporting amendments to the flood zoning (from zone 3 to zone 1).</td>
</tr>
</tbody>
</table>
APPENDIX 4: SUPPORT FROM LOCAL COUNCILLORS
Dear Richard

I trust your well.

Please find below the letter sent to Jonathan Clarke today, our apologies that this has taken a while. As you can see the letter you drafted remains the same other than a date change. We shall let you know of any responses we receive.

Kindest Regards

John

J Gilliver  
Cllr Norton & Askern Ward  
07711608140

Dear Jonathan

We are writing to you to confirm our continued support for the proposals on land at Ings Lane, the site to the immediate south of Skellow village centre. A scheme is being promoted by KCS Development Ltd and the landowner and was submitted to the Council earlier part of 2019 and through the recent Local Plan consultation.

Like many villages in the District, Skellow has areas affected by potential flooding, although it is well-known the flood mapping is not the most accurate. The developer at Ings Lane has put forward proposals suggesting that the site can accommodate around 80 family homes in easy reach of shops and public transport services. Much of the site is identified as Flood Zone 1 with no risk of flooding and it seems that every effort has been made to clarify the area that can be safely built on with the Environment Agency. An initial phase of development could take place on site in an area where all parties are agreed that there is no flood risk, with a potential second phase coming forward if the investigation currently underway, proves as expected, that the current EA flood zones have been too tightly drawn and need amending. The developer has given a commitment to only develop in areas where it is agreed there is no flood risk.

There are many areas of the Doncaster Green Belt which are sensitive to change and it is important for keeping villages separate and protecting the identity of individual settlements such
as Skellow. It is clear from the work prepared by the developer that that the land off Ings Lane can be taken out of the Green Belt without detriment to its purposes.

The Local Plan strategy identifies that Skellow along with Carcroft is a good location to accommodate new housing and this site at Ings Lane is the best site in the village. Two other sites have been put forward in the village by the Council. The land off Owston Lane (reference H3.E) has known problems of flooding whilst the proposal at Crabgate Lane (Reference H2.N) is a very large scheme which is not well related to the village centre and public transport services, there is significant local opposition to this site. You will be aware of our opposition to the site adjacent to the A1 which was recorded when the Full Council considered the issue earlier in the year. It is very likely that future residents will be dependent upon their private motor cars to get to jobs and shops, adding to congestion and pollution in the area which is the reason why the site at Ings Lane, due to its more sustainable location, would be a preferable site for new housing.

To conclude we remain of the view that Ings Lane is the best site and much better than the other options in the village which are being pushed through the Local Plan.

We look forward to hearing from you.

Sincerely

Cllr Austen White and Cllr John Gilliver

Best Regards

John

J Gilliver
Cllr Norton & Askern Ward
07711608140