Examination of the Doncaster Local Plan
Council Hearing Statement

Matter 13. Natural and Built Environment

September 2020
**Protecting open space and local green space**

Q13.1. Is policy 28 justified and consistent with national policy and will it be effective in ensuring access to high quality open spaces and opportunities for sport and physical activity? In particular:

| a) | The approach to open spaces defined on the Policies Map and open space policy areas in parts A and D. |
| b) | The approach to non-designated open spaces in part B, and the Council’s suggested changes relating to conservation areas and the setting of designated heritage assets. |
| c) | The Local Green Spaces defined on the Policies Map and the Council’s suggested change to list them in paragraph 10.17. |

1. With the change proposed in PQ40, policy 28 is consistent with national policy and is justified by the NPPF\(^1\), which emphasise the importance of green infrastructure and open space. The proposed change will add in the words ‘policy areas’ to policy 28. The new policy wording would then read; ‘Within the open space policy areas as defined on the Policies Map, proposals for the creation and enhancement of sports and recreation facilities will be supported...’ This will ensure open space is identified and retained safe from inappropriate development.

2. The Council’s response to question 6.12 covers the NPPF justification for the green infrastructure and open space policies in detail. NPPF policies 96 and 97 also emphasise the importance of an up to date assessment of open space. The Council acknowledges the green space audit needs to be reviewed but has provided an updated policy map for the Local Plan and will update the green space audit after the adoption of the Local Plan.

3. With regard to bullet point a, identifying and protecting accessible open spaces will contribute towards creating an environment where access to activities is made easier and public health improved. Part A of the policy relates directly to the open spaces as defined on the Policies Map\(^2\). These are the reviewed areas from the Green Space Audit 2013\(^3\).

4. Topic Paper 6 - Green Infrastructure and Open Space Policy\(^4\) contains the evidence of the 2013 Green Space Audit map. The sites have been reviewed (see bullet points below) for the Local Plan Policies Map\(^5\). The spreadsheet of changes can be found in appendix three of the Topic Paper\(^6\), the key points and changes are identified below:

- The green space/open space policy change list identifies 1,186 records
- 589 records remain unchanged

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\(^1\) NPPF 83d, 92a to e, 97, 99-101, 118b
\(^2\) CSD4 Doncaster Local Plan 2015-2035 Regulation 19 Publication Version Policies Map
\(^3\) SDEB18 Green Space Audit 2013
\(^4\) DMBC6 Topic Paper 6: Green Infrastructure and Open Space Policy 2020
\(^5\) CSD4 Doncaster Local Plan 2015-2035 Regulation 19 Publication Version Policies Map
\(^6\) DMBC6 Topic Paper 6: Green Infrastructure and Open Space Policy 2020
442 boundary changes to reflect the open spaces as at September 2019
66 records deleted. Some of which are covered by separate Local Plan policies
63 records merged for the open space layer (some of which will be shown by their specific typology in the next iteration of the Green Space Audit)
20 new sites
1 area outside the borough removed
3 Local green spaces added
3 sites require post publication boundary amendments

5. The policy is designed to prevent erosion by insensitive development, or incremental loss of sites. The policy and Policies Map identifies the protected areas as at 2019. The policy is positively worded to ensure appropriate development, which enhances the open space is allowed. This includes the creation and or enhancement of sport and recreational facilities such as pavilions and changing rooms, new or improved children’s play areas or multi use games areas. Ultimately, the goal of the policy is long-term sustainability, protection and improvement of open spaces.

6. Part D of the policy provides for prior consideration to applications involving the loss of open spaces\(^8\). The policy safeguards open spaces from loss by considering not only national policy, but local provision and community involvement in the local decision making process.

7. With regard to bullet point b and part B of the policy on ‘un-designated open spaces’; there are numerous open spaces which are too small to be mapped or not identified on the Policies Map or Green Space Audit. These areas tend to be small amenity road verges, landscaped or grassed incidental open spaces around buildings and residential areas and may have little or no recreational value. They can, however make an important contribution to the environmental quality, spaces for casual play, buffers separating incompatible uses, and green infrastructure connections and as such should be given due consideration through the planning system. New open spaces will also be created after plan adoption and will not be shown on the Policies Map, but will be identified in subsequent Green Space Audit reviews. This section of the policy also protects these sites. The proposed change is in response to an objection raised by Historic England at Regulation 19 stage and identified in DMBC15\(^9\) (page 19) and will ensure the policy is more effective.

8. With regard to bullet point c, the policy on Local Green Space (and suggested changes) is justified and consistent with national policy in particular paragraphs 99 and 100 of the NPPF. Local Green Space was also discussed in PQ41. The response to PQ41 is reiterated below.

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\(^7\) NPPF paragraphs 99 and 100
\(^8\) NPPF paragraph 97
\(^9\) DMBC15 Doncaster Local Plan 2015-2035 Councils Suggested Main Modifications 4 June 2020
9. The evidence base identifies the ‘local green spaces’ that have been assessed and includes the 3 sites proposed for allocation (see paragraph 1.37 of this evidence). The methodology in the document is in two parts and takes account of national guidance and a localised interpretation of the NPPF Local Green Space policy (paragraphs 99 and 100).

10. The national policy context is discussed in paragraphs 1.5 to 1.12 of the evidence. The first part of the assessment provides a site description, ownership, submission information, existing designations / permissions, ‘other call for sites reps’ and criteria for evaluating distance, size, connectivity, defined boundary and ‘how the site feels’. The second part takes account of and considers beauty, historical significance, recreational value, tranquillity, wildlife and ‘other’ in line with paragraph 99 and 100 (see paragraph 131 of the methodology). Appendix ‘A’ also provides a ‘Local Green Space Allocation Process’ for guidance.

11. The three local green space sites proposed for allocation are shown below in Table Q13.1 (with summary) and the maps are identified on page 3 onward. The full assessments of all 20 submissions can be found in Appendix D of the Local Green Space - Methodology and Sites evidence base.

Table Q13.1 Local Green Space Sites Summary

<table>
<thead>
<tr>
<th>Site no.</th>
<th>Site name and summary</th>
<th>Location</th>
</tr>
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<tbody>
<tr>
<td>162</td>
<td>West Farm Fields between High Road and Low Road West, Warmsworth</td>
<td>Warmsworth</td>
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<tr>
<td></td>
<td><strong>Summary of reasons for designation.</strong></td>
<td></td>
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<tr>
<td></td>
<td>Close community proximity</td>
<td></td>
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<tr>
<td></td>
<td>Good connectivity</td>
<td></td>
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<tr>
<td></td>
<td>Area is not an extensive tract of land</td>
<td></td>
</tr>
<tr>
<td></td>
<td>‘Feels local in nature’</td>
<td></td>
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<tr>
<td></td>
<td>Well defined boundary</td>
<td></td>
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<tr>
<td></td>
<td>The Parish Council state that the site is a remnant of the previous rural / agricultural nature of Warmsworth, and serves as an important reminder of the history of the area. The site provides a visual break between the conservation area and newer developments. This view is supported by the council’s Conservation Officer.</td>
<td></td>
</tr>
<tr>
<td>489</td>
<td>Land rear and side of Poplar Farm, Sutton Road, Campsall.</td>
<td>Campsall</td>
</tr>
<tr>
<td></td>
<td><strong>Summary of reasons for designation.</strong></td>
<td></td>
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<tr>
<td></td>
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</tbody>
</table>
‘Feels local in nature’
Well defined boundary
Views are available from the south across the open space formed by the proposed green space towards the elevated historic core of the village of Campsall and the medieval church. The historic connection between the village and the agricultural landscape is thus particularly evident here, as is the historical functional relationship of the farmstead to its land and its separation from the main body of the village. The open space also provides a pastoral setting for the small cottages on Back Lane. It therefore makes a significant positive [contribution] to the conservation area.

1015 Cardwell Court, Braithwell

**Summary of reasons for designation.**
Close community proximity
Good connectivity
Area is not an extensive tract of land
‘Feels local in nature’
Well defined boundary
The Parish council submitted information stating that the site is visually attractive and a “real feature of the village of Braithwell”. They add that the site is a scene of tranquillity when viewed especially from the church and play park, and that the site contributes to the character and appearance of the historical setting of the church and manor house.
The council’s Conservation Officer states the field is an important component of the character of the conservation area and contributes to the setting of listed church and Manor Farm and with its limestone boundary walls has some intrinsic historic character. The mature trees within the field also contribute to views towards and from the churchyard which both in their own right and in combination with the church has some aesthetic quality. Designation as green space can be supported for historic and aesthetic reasons.

12. The maps for the above sites can be found on page 60 of the Council’s responses to the Inspector’s Preliminary Questions\(^\text{12}\).

13. The suggested changes to Local Plan paragraph 10.17 will then identify the three sites. The wording change proposed is:

\(^{12}\) DMBC7 - Doncaster Council Response to Preliminary Questions - 2nd June 2020.
'These three areas sites (‘West Farm Fields, off Low Road West’, ‘Sutton Road, Campsall’ and ‘Cardwell Court, Braithwell’) are also identified on the Policies Map as Local Green Space in line with the ‘Local Green Space Methodology and Sites’ evidence base document.'

14. As already noted by the Inspector as part of preparing the Council’s response to the PQs, it has come to our attention that there has been an error when mapping the boundary to site 489 (Poplar Farm, Sutton Road, Campsall) and as such, the Council has already proposed a Main Modification. The Local Green Space evidence base\textsuperscript{13} makes it clear that site 489 refers to the larger field in this location (a portion of which was also submitted separately as site 339). However, when preparing the Local Plan Policies Map\textsuperscript{14}, site 489 has been incorrectly mapped excluding the land to the north of the site, which was simultaneously submitted as 339, when the proposal reflects the whole site.

15. To correct this error requires an amendment to the Local Green Space boundary and Residential Policy Area boundary of the supporting Policies Map. Map Q13.1a shows the 2 land use designations as per the current Policies Map, and Map Q13.1b shows how they should be shown.

*Map Q13.1a: Current Extent of Poplar Farm Local Green Space Designation*

\textsuperscript{13} SDEB20 Local Green Space – Methodology and Sites 2019
\textsuperscript{14} CSD4 Doncaster Local Plan 2015-2035 Regulation 19 Publication Version Policies Map
Map Q13.1b: Proposed Amendment to Extend Poplar Farm Local Green Space Designation (with consequential reduction to Residential Policy Area extent).

**Biodiversity and geodiversity**

Q13.2. Are policies 30, 31 and 32 consistent with national policy and will they be effective in protecting and enhancing biodiversity and geodiversity? In particular:

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

16. Policy 30 is consistent with the requirement in the NPPF paragraph 170d for planning policies to deliver a net gain in biodiversity and establish coherent ecological networks. This will be achieved as the policy requires planning decisions to deliver a net gain for biodiversity while at the same time protecting, creating and maintaining and enhancing the ecological network. The policy will be effective in helping to ensure the safeguarding and enhancement of ecological networks by ensuring development proposals are of an appropriate size, scale and type relative to their location in the ecological network and also that they strengthen and bridge gaps in the ecological network. The supporting text highlights current conservation partnerships working at a landscape scale in Doncaster, identifies biodiversity opportunity areas and references a Nature Recovery Network which is currently being developed. Together this will help to direct enhancement measures towards the most appropriate avenues.

b) The approach in policy 31 to internationally and nationally important habitats, sites and species.
17. Policy 31 is consistent with the requirement in the NPPF paragraph 171 and 174 for planning policies to distinguish between the hierarchy of international, national and locally designated sites. Internationally and nationally important sites including SPA’s, SAC’s and SSSI’s are identified and mapped on the Policies Map. Policy 31 Part A requires development to take into account priority habitats and species and highlights first the importance of following the mitigation hierarchy. This means in all development proposals harm to these features must firstly be avoided before measures to lessen the impact or compensate for any residual damage are carried out. Part B of the policy is directly related to proposals that may impact SAC’s SPA’s or RAMSAR sites and clearly sets out that development must comply with the Habitat Directives while part B addresses how impacts on SSSI’s should be dealt with.

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

18. Policy 31, part A, addresses how applications that impact on Local Wildlife sites, Local Geological Sites and non designated features of biodiversity should be dealt with. It is consistent with NPPF paragraph 175 by first stressing the importance of the mitigation hierarchy. Point 2 then sets out the need for development to deliver measurable net gains (in line with NPPF paragraph 174) by requiring applications to use the DEFRA Metric to demonstrate quantitatively that a minimum 10% net gain is delivered. The policy will also help to protect Local Wildlife and Geological Sites by requiring development to provide appropriate buffers around these features and deliver long-term management plans on sites. This is important as without management habitats of value will degrade over time. Policy 32 and Appendix 8 detail how Local Wildlife and Geological Sites will be identified for designation. Appendix 8 sets out detailed criteria that need to be met for a site to be considered of sufficient value to be designated as a local wildlife or geological site. This is an effective way to set a benchmark standard so that as wildlife site assets across the borough change and develop they can be compared objectively.

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

19. The changes to policy 31 part C help to emphasise the need for SSSI’s to be part of a coherent ecological network as indicated in paragraph 170 of the NPPF. As some of the best examples of biodiversity in the Borough, it is essential that they do not become isolated through development. The changes to paragraph 10.40 were suggested by Natural England in order to emphasise that all applications correctly apply the mitigation hierarchy.
That planning applications correctly apply the mitigation hierarchy is required by NPPF paragraph 175 part A.

**(e) What is the purpose of policy 32?**

20. Policy 32 is required because the quality of wildlife sites can change significantly over relatively short time frames. A site of good quality can degrade over time if no or inappropriate management measures are carried out. Similarly sites that were once not considered of sufficient value to meet the criteria can be improved through projects that create new habitat and through good habitat management. In addition some areas of land in private ownership may never have been subject to the necessary ecological surveys to assess them against the Local Site qualification criteria. The Local Plan covers a significant time frame from 2015 to 2035. Within this time frame we would expect new areas of land to be identified that are of sufficient quality to be meet the site selection criteria in Appendix 8. These sites should be offered the same level of protection as Local Sites shown on the Policies Map\(^\text{16}\). Policy 32 sets out that sites shown to meet the selection guidelines will be offered the same level of protection as those already identified in the year that the Local Plan is produced. Local Wildlife Sites are and will continue to be a core component of Doncaster’s ecological network. It is recognised that wildlife has become fragmented and Policy 32 provides the ability to demonstrate in a qualitative way the worth of areas of land for biodiversity. This is vital as we move forward in creating the Nature Recovery Network that offers a natural environment that has bigger, better and more joined together sites for wildlife.

**Woodland, trees and hedgerows**

21. Yes. Trees, hedgerows and woodlands are well recognised as contributors to maintaining and improving the quality of life for people living and working in Doncaster. They are significant in helping to attract new investment into the Borough as well as environmental services such as improving air quality and habitat/ecological value. Policy 33 seeks to protect these existing features as valuable assets to the local area, whilst also requiring new soft landscaping to provide enhancement and proportionate replacement planting where existing trees, hedgerows and woodland may be lost to development. This works towards sustaining an appropriate amount and mix of development (including green and other public spaces) helping to compliment other policy areas/topics which is in line with NPPF paragraph 127d.

\(^{16}\) CSD4 Doncaster Local Plan 2015-2035 Regulation 19 Publication Version Policies Map
22. This is supported as the NPPF recognises the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of trees and woodland (NPPF paragraph 170b). The NPPF also places considerable importance on veteran trees and ancient woodland which are features that cannot be replaced, requiring that development does not imperil them (NPPF paragraph 175c).

23. Policy 33 is also compliant and consistent with nationally recognised surveying methods and industry best practice. For example, the current version of British Standards Institute 5837: Trees in relation to design, demolition and construction – Recommendations; Defra (2007) and the Hedgerow Survey Handbook, a standard procedure for local surveys in the UK.

Landscape

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

24. Yes. The Council considers the requirements of Local Plan Policy 34 are justified and consistent with national policy.

25. A proposed change to the wording of the Policy is suggested in response to a representation to the Publication version Local Plan by the CPRE\(^\text{17}\). The change proposes to include reference to the need to consider potential cumulative impact in the wording of the paragraph that precedes criteria F to I of the Policy.

"Where development proposals will most likely result in a significant impact on the Borough’s landscape the proposals should assess the potential impact (including cumulative impact) and propose how any negative effects will be minimised. In doing so consideration should be given to:"

26. The CPRE considered a total re-write of the Policy was required to ensure consistency with the NPPF (OTH39) - an alternative version was provided in their representation.

27. The CPRE identified which parts of the NPPF they considered the Policy was inconsistent with. The Council considers that the existing Policy is consistent with the NPPF references quoted by CPRE:

- **NPPF para 20d** requires the inclusion of strategic policy to make sufficient provision for the "conservation and enhancement of the

\(^{17}\) CSD11 - Full Representations on the Local Plan Regulation 19 Publication Version, C/Policy 34/0077/6/021
natural, built and historic environment, including landscapes”. Policy 34, a strategic policy, refers to both conservation and enhancement in its opening paragraph.

- **NPPF para 127c** requires that planning policies should ensure that developments are "sympathetic to local character and beauty, including ... landscape setting". Policy 34, Part A refers to landscape character, and Part B refers to setting.

- **NPPF para 141** is national policy for protecting Green Belt, referring to how planning authorities should plan positively to enhance the beneficial use of Green Belts, once they have been defined, by the retention and enhancement of landscapes. The Local Plan defers Green Belt policy to the NPPF. However, Policy 34 applies to proposals in both the Green Belt and Countryside and requires conservation, enhancement and where possible restoration of landscapes.

- **NPPF para 149** requires that "plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for ... landscapes". Supporting explanatory text at paragraph 10.54 (first bullet point) to Policy 34 sets out that landscape scheme preparation should consider climate change.

- **NPPF para 151** is national policy to help increase the use and supply of renewable and low carbon energy and heat including a need to ensure "that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts)". Consideration of the landscape impact of renewable and low carbon is included in Policy 59, Part B5. To avoid repetition specific reference to this issue is not included in Policy 34.

- **NPPF para 170a&b** require planning policies to contribute to and enhance the natural and local environment by (a) "protecting and enhancing valued landscapes ... (in a manner commensurate with their statutory status or identified quality in the development plan)"; and (b) "recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services".

In respect of para 170a, there are no national landscape designations in Doncaster; all landscapes are of local value (described in the local landscape character assessment) and covered by the Policy. In respect of para 170b, the references to recognition of intrinsic character and beauty of the countryside is national NPPF policy which does not need to be repeated in the Local Plan (both should be read together).

- **NPPF para 171** requires that "plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries."
There are no national landscape designations in Doncaster; all landscapes are of local value (described in local landscape character assessment) and covered by the Policy. Policy 34 is supported by Policy 27 (Green Infrastructure) which seeks to protect, enhance and, where possible, extend Doncaster's Green Infrastructure, including landscapes. Both policies can seek contributions to landscapes that operate at a catchment or landscape scale. Policy 49 (Landscaping of New Developments) also requires consideration of Green Infrastructure.

- **NPPF para 180** includes national policy for consideration of the "likely effects (including cumulative effects) of pollution on ... the natural environment" with para 180b requiring the identification and protection of tranquil areas.

28. As discussed above, a proposed change to the Policy is considered helpful to refer to cumulative impact. In respect of tranquillity, criterion A of the Policy requires consideration of tranquillity as does Criterion A4 of Policy 27 (Green Infrastructure). More generally the impact of noise pollution is addressed by Local Plan Policy 55 / Appendix 11.

**Historic environment**

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

29. Yes. The Council considers that policies 35 to 41 and appendices 9 and 10 are consistent with national policies and specifically those in Chapter 16 of the NPPF. Policy 35 is the overarching strategic heritage policy and Policy 36 expands on the recording of heritage assets and heritage statements, which are areas only touched on by the NPPF. Policies 37 to 41 deal with heritage assets by category, and give the Development Management Case Officer more specific criteria than the NPPF on which to assess applications. Each of these policies has been developed through liaison with Historic England’s Policy Officer, and, where necessary, amended by the Council to ensure they are compliant with the NPPF.

30. The Council considers that these heritage policies together with other aspects of the Local Plan do set out an effective and positive strategy for the conservation and enjoyment of the Borough’s historic environment as required in the NPPF. Policy 35A identifies those elements that contribute to the distinctive character of the Borough which are significant in themselves but also support design policies on assessing character and encouraging local distinctiveness. Policies 35B and 35C support the objectives identified in the wider heritage strategy of the Borough where these have a spatial dimension. This policy recognises, too, that the
Borough has undesignated heritage assets of some significance that would otherwise be overlooked. It offers a positive strategy for identifying these using the criteria in Appendices 9 and 10, with policies for their management through Policies 39 and 41. Policy 35C includes proposals for addressing heritage at risk and the re-use of historic buildings. Such opportunities, but also constraints, are identified as part of the sustainability appraisal of allocation sites and where relevant these are included in site specific requirements (Appendix 2 of the Local Plan itself). Taken together, this forms a positive strategy for the management of the historic environment and this view has been endorsed by Historic England in its responses thorough various formal and informal consultations leading up to Submission of the Plan.

**Agricultural land and soil and water resources**

<table>
<thead>
<tr>
<th>Q13.6.</th>
<th>Are the Council’s suggested changes to policy 61 necessary to make the Plan sound and would they be effective in so doing?</th>
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32. The first makes a change to support development proposals that can demonstrate an ability to make positive progress towards achieving 'good' status or potential under the Water Framework Directive (WFD)\(^{18}\). This was made in response to a representation to the Publication version Local Plan by the Environment Agency\(^ {19}\). The change proposes to include an additional criterion (numbered E - with existing criterion E becoming F):

**E) Proposals will be supported which will:**

1. make positive progress towards achieving ‘good’ status or potential under the Water Framework Directive in the Borough’s surface and ground waterbodies; and,

2. promote water efficiency measures which take account of current water availability (e.g. informed by Catchment Abstraction Management Strategies) and future demand;

33. The EA Humber River Basin Flood Risk Management Plan 2015 – 2021 covers the borough of Doncaster (The Don and Rother & Idles and Torne management catchments) and sets out the requirements to deliver the objectives of the EU WFD. The WFD requires UK water bodies to achieve established chemical and ecological water quality targets. Where development is proposed which may have a potential negative impact on such, it will need to be assessed, with mitigation measures set out, to reduce any such impacts. The addition to the Policy will, in consultation

\(^{18}\) OTH20 EC Water Framework Directive 2000
\(^{19}\) CSD11 - Full Representations on the Local Plan Regulation 19 Publication Version, C/Policy 61/0014/15/011
with the EA, ensure applications will not lead to negative effects to water quality, and improve water quality in areas where current levels are below standards.

34. To ensure that the additional criteria of the Policy can be effectively monitored, it is proposed to also now add an additional monitoring indicator (Local Plan Appendix 12, page 377) as a Main Modification to the plan as follows:

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<tbody>
<tr>
<td>17,18,19,20</td>
<td>Permissions granted contrary to sustained objection from the Environment Agency on water quality grounds</td>
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35. The second proposed modification is made in response to the Inspector's Preliminary Questions and proposes to delete Part A1 of Policy 61 (with consequential renumbering of parts A2 and A3) which reads: "1. there is an overriding need for the proposal;".

36. NPPF (OTH39) Paragraph 170b requires that planning policies recognise the "economic and other benefits of the best and most versatile land" with footnote 53 clarifying that "where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality."

37. It is not considered necessary to retain the reference to overriding need in the Policy wording. In assessing planning applications, and balancing material considerations for and against any given proposal, the amended Policy will require impact upon best and most versatile agricultural land to be considered and ultimately assessed against the need for the proposal. There is no necessity to retain reference to 'overriding need' in the Policy. This change is not considered to lessen the importance attached to the best and most versatile land but would make the Policy more consistent with the NPPF in paragraph 170. The significant loss of best and most versatile land would remain capable of being a material consideration that could be sufficient to refuse inappropriate development.

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20 Don INSP2 PQs, specifically PQ46