Hearing Statement – Matter 14

Doncaster Local Plan

On behalf of Harworth

August 2020
1. **Introduction**

1.1. This is a Hearing Statement prepared by Spawforths on behalf of Harworth in respect of:

   Matter 14: Other Environmental Issues

1.2. Harworth has significant land interests in the area and has made representations to earlier stages of the Local Plan process.

1.3. The Inspector’s Issues and Questions are included in **bold** for ease of reference. The following responses should be read in conjunction with Harworth comments upon the submission version of the Doncaster Local Plan, dated September 2019.

1.4. Harworth has also expressed a desire to attend and participate in Matter 14 of the Examination in Public.
2. Matter 14 – Other Environmental Issues

Q14.1. Are the Council’s suggested changes to policy 55 and reasoned justification necessary to make the Plan sound and would they be effective in so doing?

2.1. Haworth has no specific comments on this issue.

Q14.2. Will policy 56 be effective in ensuring that development proposals include appropriate mitigation to deal with contamination and unstable land? Is the Council’s suggested change to paragraph 13.22 necessary to make the Plan sound?

2.2. Harworth has no specific comments on this issue.

Q14.3. Is the Council’s suggested change to the sixth paragraph of policy 2 (or “spatial strategy” box) necessary and would it make this part of the Plan sound?

2.3. Harworth raised fundamental concerns in Matter 1 with regards to the approach to Flood Risk within the Plan in terms of its strategy and site allocations. As considered under Matter 1, National Policy is clear that flood risk in Plan making should be managed through, among other things, the application of a sequential risk based approach, steering new development to areas with the lowest risk of flooding and that development sites should not be allocated if there are reasonably available sites appropriate for the proposed development with lower risk of flooding. National Policy considers that the Strategic Flood Risk assessment provides the basis for applying the test (NPPF, paragraphs 157 and 158).
2.4. Paragraph 6 of Policy 2, with particular reference to ‘other development will only be accommodated in flood zones where sites are safe or can be made safe’, is not consistent with the approach established in National Policy and guidance. Harworth also note that there is not a consistent approach to flood risk in paragraphs 6, 7 and 8 of Policy 2 as submitted, and Harworth do not consider that the changes proposed in PQ13 are sufficient to overcome this. Policy 2 should be clear that the approach to flood risk for all new development, allocations or otherwise, will be required to be consistent with National Policy and guidance.

Q14.4. Are policies 57 and 58 consistent with national policy and would they be effective in ensuring that development is safe from the risk of flooding and would not increase flood risk elsewhere? Is the approach to windfall sites in areas of flood risk set out in policy 58 part C consistent with national policy or otherwise justified? Is the Council’s suggested change necessary and would it make the policy sound?

2.5. Harworth has no specific comments to make in response to Policy 57 and 58.

Q14.5. Do policies 59 and 60 set out a justified and positive strategy that will be effective in helping to increase the supply of renewable and low carbon energy that maximises the potential for suitable development whilst ensuring that adverse impacts are addressed satisfactorily? In particular: a) The priorities set out in policy 59 part A (subject to the Council’s suggested change to refer to community energy schemes). b) The requirements of policy 59 part B.1 for all proposals to undertake community engagement and demonstrate how they will deliver environmental, social and economic benefits. c) The Area of Search for Wind Energy Developments defined on Figure 13 and the Policies Map. d) The requirements of policy 60 parts D to J for all wind energy developments.
2.6. Harworth has no specific comment in relation to this issue.

**Proposed Change**

2.7. To overcome the objection and address soundness matters, the following changes are proposed:

- Modify Policy 2 to ensure consistency with NPPF in relation to Flood Risk