Examination of the Doncaster Local Plan

Harworth Group Plc
Rossington (Site Ref 247) (Representor Ref 05205)
Conisbrough and Denaby (Site Ref 1035) (Representor Ref 05205)

Hearing Statement
in relation to
Matter 13 – Natural and Built Environment

September 2020
Introduction / Context

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

2. This Statement provides Harworth’s response to the Inspector’s Matters, Issues and Questions (INSP4) for consideration during the forthcoming hearing sessions. Harworth does not intend to participate in the hearing session in relation to Matter 13 and understands that these written comments will carry the same weight as any comments made orally.

3. This Statement relates to Matter 13 regarding ‘Natural and Built Environment’ in particular, the following questions which are replicated ahead of Harworth’s response.

Question 13.1

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 [NPPF 171, 96 and 97]? 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

Harworth Response

4. Harworth does not wish to comment specifically on the wording of Policy 28, but considers that the Plan is not justified and consistent with national policy relating to high quality open spaces and opportunities for sport and physical activity insofar as it proposes the continued allocation of Site 383 for housing, when this site has become, and functions as, a well-used public open space of recreation and amenity value that should be retained.

5. As stated separately, the allocation of Site 383 for housing does not represent the most appropriate strategy when considered against reasonable alternatives. In recognition of the existing nature and usage of Site 383, this should be not be allocated for housing and should instead be identified as a site for Open Space, Sports and Recreation and as a Local Wildlife Site.

6. This would be supported by the Council’s assessment of Site 383 in the ‘Housing and Employment Sites Selection Methodology and Results Report (June 2019)’ which refers to the existing pedestrian routes and desire lines on the site which need to be retained, as well as the retention of the skate park currently on the site. Accordingly, it is evident that Site 383 forms a well-used public open space of recreation and amenity value that should be retained.

Question 13.2

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.

b) The approach in policy 31 to internationally and nationally important habitats, sites and species.

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

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

e) What is the purpose of policy 32?

Harworth Response

7. Harworth has no specific comment regarding the consistency of Policies 30, 31 and 32 with national policy, but considers that the Plan is not consistent with national policy to protect and enhance biodiversity insofar as it proposes the continued allocation of Site 383 for housing, when this site is now recognised for its biodiversity value.

8. As stated separately, the allocation of Site 383 for housing does not represent the most appropriate strategy when considered against reasonable alternatives. In recognition of the existing nature of Site 383, this should not be allocated for housing and should instead be identified as a site for Open Space, Sports and Recreation and as a Local Wildlife Site.

9. Site 383 is recognised by the Council to be of significant value for biodiversity, public access and amenity, yet its protection for these purposes is not considered given that, despite its nature and function, it is not Green Belt and is therefore prioritised as a housing allocation.

10. The Council’s ‘Housing and Employment Sites Selection Methodology and Results Report (June 2019)’ assesses sites in these regards and states that Site 383 is ‘identified as having significant negative effects on biodiversity (Objective 12A(i))’ as it ‘entirely overlays part of a much wider Local Wildlife Site Conisbrough North Cliff (reference 5.8)’.

11. In recognition of these constraints, the commentary continues to state that ‘if the site was to be taken forward as an allocation, there would need to be significant mitigation and compensation for any habitat losses. In addition, the existing woodland would need to be retained and buffered from built development by at least 10m. The design of the site would also need to include a significant wide grassland/habitat corridor through the development connecting the habitat in the north to the wider countryside’.

12. The development requirements for Site 383 stated within Appendix 2 of the Publication Draft Local Plan recognise that the site ‘is crossed by pedestrian routes and desire lines which should be taken into account’, that ‘the PROW needs to retain its green character’ and that the ‘skate park which is currently on site should be retained [with a landscape] buffer to be maintained around it’.

13. It is evident from this, that the allocation of Site 383 is effectively proposing to develop housing on land which already forms well-used public open space and that is of significant biodiversity value. The mitigation measures required to comply with Policy 30 and 31 and could render the site undeliverable or at best result in a significantly reduced developable area.

14. A reasonable alternative as put forward by Harworth is therefore the omission of site 383 as a housing allocation and its alternative designation for Open Space, Sports and Recreation and as a Local Wildlife Site. In this context it would also be appropriate for the site to be included within the Green Belt, thereby ensuring continuity of the Green Belt in this location.
15. Harworth maintains that this possible alternative designation of Site 383 means that its proposed allocation for housing in the draft Plan is not justified given the availability of Site 1035 to accommodate the required housing without harm to biodiversity or public open space etc.

16. In direct comparison of environmental, biodiversity and amenity factors, Site 1035 is considered to be substantially preferable to Site 383.