Hearing Statement – Matter 16

Doncaster Local Plan

On behalf of Strata Homes

August 2020
1. **Introduction**

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

Matter 16: Other Issues

1.2. Strata Homes 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 for ease of reference. The following responses should be read in conjunction with Strata Homes comments upon the submission version of the Doncaster Local Plan, dated September 2019.

1.4. Strata Homes has also expressed a desire to attend and participate in Matter 16 of the Examination in Public.
2. **Matter 16 – Other Issues**

**Q16.1.** Assuming that the changes suggested by the Council are made, are the definitions in Appendix 1 to the Plan consistent with those in the NPPF and will they provide sufficient clarity to ensure that all of the policies in the Plan can be effectively applied?

2.1. Strata Homes has no Specific Issues in relation to this issue.

**Q16.1A.** Do any other parts of the Plan need to be modified to reflect the changes to the Use Class Order that will come into effect on 1st September 2020?

2.2. Strata Homes has no specific comments on this issue.

**Q16.2.** Are there any parts of the Plan that have not been addressed by the questions set out above that are unsound?

2.3. Strata Homes has concerns relating to the weight attributed to community consultation responses without sufficient regard to the nature of comments and whether they form material planning considerations. Whilst we have raised this in Matter 1 in relation to Q1.3, the issue was not explicitly raised by the questions, as such we provide further detail relating to our concerns.

2.4. Stage 7 of the Site Selection Methodology [SDEB46], indicates that this concluding stage includes feedback from the consultation responses to the 2018 consultation. It is not clear what weight or role this has had in the site selection process. For example, there are a number of sites with significant notable objections, in both context and number, are allocated, whilst sites with only a small number of objections are rejected. There are a number of sites where
consultation responses are not referred to. It is therefore not possible to determine the weight attributed to consultation responses.

2.5. It is noteworthy that the Inspector’s Letter in respect of the Doncaster LDF Sites and Policies Development Plan Document [OTH ** Final Letter Stage 1 v2, June 2014] paragraph 51 expressed similar concerns in relation to the Site Selection Methodology at the time.

2.6. For example, Site 165/186, is noted within CSD 10 to have had the most objections, 465 signature petition, 203 standard letters and 27 individual responses, and yet this site is allocated. Site 234 was previously identified as a draft allocation and received significantly fewer responses, 20 letters of objection, and is not allocated despite performing better than allocated Site 033 in the Sustainability Appraisal and the Council’s Green Belt assessment, according to the summary within SDEB 46. Strata Homes have reviewed the consultation summary in CSD 10 and the nature of comments recorded for their Site 234 appear no more or less substantive than those raised in Site 165/186. However the conclusion in the Site Selection Methodology for Site 234 indicates that objections are the reason why the site is not released from the Green Belt.

2.7. Therefore, this would imply in this case greater weight is given to consultation responses, regardless of whether the responses form material consideration, than the sustainability appraisal. This is particularly concerning in the case of site 234 which was previously identified as a draft allocation, and performs better within the sustainability appraisal than other allocations within Doncaster MUA, such as Site 033. This is not consistent with national policy in relation to Green Belt release which seeks to ensure that first consideration is given to land which has been previously developed and, or is well served by public transport. The weight given to the consultation process has therefore undermined the site selection process.

**Proposed Change**

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

- Review the approach to site selection and Site selection methodology and ensure that there is clarity in terms of weight attributed to consultation responses and key considerations.
- Reinstate site 234 as an Allocation