Full Representations on the Local Plan Regulation 19 Publication Version - Redacted Version for Publishing

March 2020
This document contains full Representations as submitted to the Doncaster Local Plan Regulation 19. The Representations are set out in Local Plan document order (followed by the evidence base) and each Representation includes the verbatim comment (unless such comments have needed to be redacted as the Council reserves the right not to publish or take into account any Representations which are openly offensive or defamatory). A Council summary of the comment, followed by a short/initial response from the Council to the Representation is also provided. Please note, a number of the Representations also submitted additional supporting information, such as advocacy documents, site technical surveys and assessment work, masterplans etc. These supporting documents are not included but it should be noted that all the Representations can be viewed in full via the following web-link:

https://www.doncaster.gov.uk/services/planning/local-plan-publication-representation

It should also be noted that a number of the Representations also includes contextual and background comments, reiterates tests of soundness and national policy, and/or including comments that are introductory or conclusions in nature rather than considered to be an actual key part of the Representation. Where this is clear, such comments have been filtered out but do still appear at the end of this document for completeness. Please note, these comments have also been summarised but will generally not have responses to them.

The Regulation 22 Statement of Consultation (Doc Ref: CSD10) also includes a summary of the main issues raised followed by a Council response in Local Plan document order.
Tickhill Town Council is generally supportive of the Doncaster Local Plan (2015-2038). We particularly commend its commitment to the vitality and viability of town centres and its recognition of the permanence of the Green Belt, both of which are strongly welcomed by Tickhill community. We agree with the assessment that the quality of the contribution of the Green Belt around Tickhill warrants its protection against further development in it while difficulties of accessing sites also militate against the allocation of further housing sites.

Summary:

Tickhill Town Council is generally supportive of the Local Plan. It's commitment to the vitality and viability of town centres and its recognition of the permanence of Green Belt are strongly welcomed by the local community. We agree with the assessment that the quality of the contribution the Green Belt makes to land around Tickhill warrants its protection and that access is also an issue for local sites.

Response:

Support welcomed
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**Comment:**
Tickhill Town Council is generally supportive of the Doncaster Local Plan (2015-2035). We particularly commend its commitment to the vitality and viability of town centres and to the permanence of the Green Belt, both of which are highly valued by the Tickhill community. We agree with the assessment that the quality of contribution to the Green Belt of land around Tickhill and difficulties of access rule out further housing allocations.

**Summary:**
Supports the Plan as 'sound'. Tickhill Town Council is generally supportive of the Doncaster Local Plan (2015-2035). We particularly commend its commitment to the vitality and viability of town centres and to the permanence of the Green Belt, both of which are highly valued by the Tickhill community. We agree with the assessment that the quality of contribution to the Green Belt of land around Tickhill and difficulties of access rule out further housing allocations.

**Response:**
Support welcomed
Comment Ref:  S/General/0220/11/001
Attend Examination:  Not Stated
Reason:  
Area:  General Comments - Support
Policy:  

Tests of Soundness:

Comment:
Edenthorpe Parish Council members give their support to Doncaster Local Plan and would also like to thank you for all the help and advice you gave towards Edenthorpe Neighbourhood Plan.

Summary:
Supports the Doncaster Local Plan 2015-2035

Response:
Support welcomed
At its meeting on 19 September 2019 the Parish Council decided that no objection should be raised in respect of the draft Local Plan for 2015 - 2035 but, that the Clerk be requested to register the Council’s concerns about the absence of meaningful traffic impact assessments when developments are considered because:
- there is no reliable, or current, base data for traffic movements on A, B and classified unnumbered roads which makes meaningful assessment impossible.
- traffic impact assessments are only ever undertaken within the immediate area of a proposed development by developers’ contractors.
- traffic impact assessments ignore the impact of developments on the road network in communities near to proposed developments.
- traffic impact assessments do not take account of the loss of amenity in nearby communities.

It is requested that consideration be given to requiring more meaningful traffic impact assessments in future so that the effects on the local road network and communities are properly considered and any Section 106 financial considerations are applied to the affected communities in consultation with the Parish Council(s) in the area. (SEE EMAIL FOR IMAGE OF AREA)

Summary:
The Parish Council raises no objection to the Draft Local Plan. But it would like to register it’s concerns about the absence of meaningful traffic impact assessments when developments are considered because:
- there is no reliable, or current, base data for traffic movements on A, B and classified unnumbered roads which makes meaningful assessment impossible.
- traffic impact assessments are only ever undertaken within the immediate area of a proposed development by developers’ contractors.
- traffic impact assessments ignore the impact of developments on the road network in communities near to proposed developments.
- traffic impact assessments do not take account of the loss of amenity in nearby communities. Consideration should be given in the future to more meaningful traffic impact assessments so that the effects on the local road network and communities are properly considered and any Section 106 financial considerations are applied to the affected communities in consultation with the Parish Council(s) in the area.

Response:
The Council notes the comments regarding traffic impact assessments. Traffic modelling has taken place as part of the Local Plan process for both the local and strategic road network. They are also undertaken as part of planning applications.
Comment Ref: C/General/0293/11/001
Attend Examination: Not Stated
Reason:
Area: General Comments - Support
Policy:

Tests of Soundness:

Comment:
Thank you for consulting Wakefield Council on the Publication Draft of the Doncaster Local Plan. Officers have reviewed the plan and have no comments to make on this draft of the plan. The Council supports the plans submission for public examination.

Summary:
Wakefield Council has reviewed the plan and has no comments to make. The Plan is supported for submission for public examination.

Response:
Noted. Support is welcomed.
After reviewing the Doncaster Local Plan, it contains policies on: - protecting playing fields in accordance with the NPPF. - promoting new sport facilities as part of new housing developments in accordance with their PPS - and promoting active design. This considers the plan meets the tests of soundness.
This is a good Plan. First of all, the Plan has clearly been informed throughout and its policies drafted to achieve consistency with the National Planning Policy Framework. It also very clearly recognises that the basis on which the Plan has been prepared could change within a short timescale and this is reflected in the commitment to review the Plan at least every 5 years and in the flexibility provided particularly by Policy 2(5) Countryside and Policy 26. The Plan balances the Council’s aspirations for economic growth/to achieve a more diverse economy and to increase the supply of homes to meet all needs/to create mixed and balanced communities with the need to protect environmental and heritage assets and to recognise technical constraints to the development.

Summary:
This is a good Plan, clearly been informed throughout and its policies drafted to achieve consistency with the NPPF. It also very clearly recognises that the basis on which the Plan has been prepared could change within a short timescale and this is reflected in the commitment to review the Plan at least every 5 years and in the flexibility provided particularly by Policy 2(5) Countryside and Policy 26. The Plan balances the Council’s aspirations for economic growth/to achieve a more diverse economy and to increase the supply of homes to meet all needs/to create mixed and balanced communities with the need to protect environmental and heritage assets and to recognise technical constraints to the development.

Response:
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**Comment:**

I am responding on behalf of the Sheffield City Region (SCR) Local Enterprise Partnership and the SCR Mayoral Combined Authority, particularly in regard to the headline economic growth ambitions of the LEP and their linked ambitions for housing in the City Region. As set out in my previous response to the informal consultation stage of the Local Plan (26 October 2018), Doncaster has an important role to play in delivering the growth ambitions of the SCR Strategic Economic Plan. As such, I note that the Local Plan has the aim of delivering 481 ha of employment land over the 2015-2035 period which would make a significant contribution to our economic targets as well as provide headroom to deliver any new targets being developed through a refresh of the current Strategic Economic Plan. The Local Plan also emphasises the important position of Doncaster Urban Centre, Doncaster-Sheffield Airport and Unity. These are three of eight Major Growth Areas identified by the MCA and LEP in its Integrated Infrastructure Plan for SCR and in subsequent work on investible propositions. The areas have a significant role in the city region’s economic future and it is therefore right for these areas to play a key role in the Local Plan. Linked to their economic ambitions, the LEP and MCA have also emphasised the important role that new housing has to play in creating the conditions for growth. The Local Plan’s aim of delivering 18,400 new homes between 2015 and 2035 (ie up to 920 per annum) is therefore welcomed as an ambitious target which is above and beyond the Government’s own Local Housing Need calculation, reflecting an uplift for the growth envisaged. Although the refresh of the LEP’s current Strategic Economic Plan is still be concluded, I support the work that has been done to anticipate this in Doncaster’s Local Plan and consider that the housing requirement it sets will help to deliver the growth ambitions that we set in a new Strategic Economic Plan. Furthermore, the new Strategic Economic Plan is also likely to focus upon sustainability, inclusion and quality of economic growth which aligns with the proposed Local Plan.

**Summary:**

The response is on behalf of the SCR LEP and the SCR Mayoral Combined Authority in regard to the LEP economic growth ambitions and the linked housing ambitions. Doncaster has an important role to play in delivering the SCR’s growth ambitions. Note that the Local Plan aims to deliver 481 ha of employment land over the plan period which will make a significant contribution to the SCR economic targets and provide headroom to deliver new targets through the refresh of the Strategic Economic Plan. The Local Plan correctly emphasises the position of Doncaster Urban Centre, Doncaster Sheffield Airport and Unity which are three of the eight Major Growth Areas identified in the SCR Integrated Infrastructure Plan and investible propositions. The Local Plan’s aim of delivering 18,400 new homes within the plan period is welcomed as an ambitious target which is above the Government’s own Local Housing Need calculation. The work on the Local Plan is supported and consider that the housing requirement will help to deliver growth ambitions that will be set in the new Strategic Economic Plan. The new SEP will also focus on sustainability, inclusion and quality of economic growth which will align with the Local Plan.

**Response:**

Noted. The support given by Sheffield City Region/Mayoral Combined Authority is welcomed.
In principle the Council has resolved to support the Local Plan. The Council recognised the need for Doncaster to introduce a planning framework through the Local Plan to help shape the growth and development of the district. Notwithstanding the Council's general position of support, the Council would like to make the following comments: (SEE OTHER COMMENTS)

Summary:
Comment noted

Response:
Support in principle welcomed
Comment:
Highways England has not yet reached a position whereby we can determine the plan to be sound or unsound. We are currently working with Doncaster to undertake technical assessments of the traffic impacts of Local Plan traffic on the Strategic Road Network (SRN). Our expectation is to have an agreed position prior to Examination in Public (EIP).

Summary:
Highways England cannot yet determine whether the plan is sound or unsound. Highways England is working with DMBC to undertake technical assessments of the traffic impacts on the SRN. Highways England expects to have a position agreed prior to Examination.

Response:
Position is noted and discussions are ongoing as part of the technical assessment the Representation refers to.
UKOOG Response: We have no comments on these policy areas. THIS WAS STATED FOR THE FOLLOWING POLICIES: Policies 2 to 12 Policies 14 to 25 Policy 27 to 29 Policies 32 and 33 Policies 35 to 50 Policy 52 to 54 Policies 58 to 63

Summary:
UKOOG Response: We have no comments on these policy areas. THIS WAS STATED FOR THE FOLLOWING POLICIES: Policies 2 to 12 Policies 14 to 25 Policy 27 to 29 Policies 32 and 33 Policies 35 to 50 Policy 52 to 54 Policies 58 to 63

Response:
No comment required
IGas supports the process of local plan considerations and wishes to ensure that any proposed plan with respect to onshore hydrocarbons is sound and meets with the criteria and policies outlined by Government in the NPPF (as amended), Planning Practice Guidance and related Written Ministerial Statements. In particular, any policy framework which serves to significantly impede or prevent such development in areas where minerals are found and have been licensed by the Government for hydrocarbon development, will be contrary to national policy unless there is strong evidential justification. The planning process for onshore oil and gas is one of five regulatory processes that are required under the current policy framework set by government. It is, therefore, considered that the Plan should reference each regulatory function and identify those areas, which fall outside of the planning process. Planning Policy Guidance 012 and 122 make clear that mineral planning authorities are not responsible for matters covered by other regulatory regimes. It states, MPAs “should assume that these regimes will operate effectively. Whilst these issues may be put before mineral planning authorities, they should not need to carry out their own assessment as they can rely on the assessment of other regulatory bodies.” This planning policy principle has been re-confirmed in a number of legal cases (see Frack Free Balcombe Residents Association v West Sussex CC 2014). (Note 1 - [http://www.bailii.org/ew/cases/EWHC/Admin/2014/4108.html](http://www.bailii.org/ew/cases/EWHC/Admin/2014/4108.html))

**Summary:**

Any policy framework which serves to significantly impede or prevent such development in areas where minerals are found and have been licensed by the Government for hydrocarbon development, will be contrary to national policy unless there is strong evidential justification.

**Response:**

Comment noted
The NYCC Council Plan 2019-2023 sets the ambition that 'North Yorkshire is a place with a strong economy and a commitment to sustainable growth that enables our citizens to fulfil their ambitions and aspirations' with priorities including, 'Delivering a modern integrated transport network - delivering a Strategic Transport Prospectus and Local Transport Plan, connecting North Yorkshire to the rest of the North and the UK'; and, 'enhancing the environment and developing tourism and the green economy, by promoting and improving the county’s environmental, ecological and heritage assets to deliver a high quality natural and built environment?' The Strategic Transport Prospectus sets out how NYCC would like to work with government, Transport for the North and the Northern City Regions on transport improvements and to ensure that improved transport connections allow England’s largest County to both contribute to and share in the economic benefits of The Northern Powerhouse. It identifies three Strategic Transport Policies: - Improving east-west connectivity (including Trans Pennine links) - Improving access to High Speed and conventional rail - Improving long distance connectivity to the north and south

Summary:
Comments noted.

Response:
Noted
**Comment Ref:** C/Introduction/0746/1/001  
**Name:** Rhonda Job  
**Organisation:** Marr Parish Council

### Tests of Soundness:

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### Comment:

Following our most recent Parish meeting and on the resident's feedback we have previously reviewed the Draft proposal on Homes and Settlements and the accompanying Green Belt Reviews, Sustainability Appraisal along with the Feedback from previous consultations. Reference has also been made to the various accompanying evidence based Reports and the amended Vision, Aims and Objectives and consideration has been given to the Local Plan in its entirety, including the Appendices, HELAA, Settlement Background Paper, Settlement Audit, Local Plan Evidence Base, Doncaster Infrastructure Strategy, Green Belt Topic Paper, Green Belt Stage 3 Site Summaries, Section 106 Monitoring Report, and NPPF March 2019. Based on available documents the Marr Residents have requested that I, on their behalf, formally register their contribution to the Inspector on the updated proposals for Doncaster’s Local Plan. Marr Parish Meeting agreed that its response could be better conveyed through a written submission. We would like to congratulate the Council on their in-depth analysis and acknowledge the work and effort of DMBc staff in collating these reports, with special recognition to the Planning Department for their time and effort in collating these reports. We would also like to pass on our personal thanks to the Planning Officers for their assistance in explaining how the proposals within the Local Plan may affect our Parish. This was very much appreciated and their proactive response encouraged a belief that our resident's views were important and would be carefully considered. We appreciate the extended deadline for contributions, as once again, time scheduling of the consultation process has been conducted during holiday periods. However, due to the vast number of reports that have only recently been made available, together with the very short consultation period, this has meant it has been an onerous task for the Parish to assimilate and review the information from the numerous and lengthy documents in order to form its opinion and give credible feedback. We would like to suggest and reiterate once again, that for future consultations, Reports are made publically available when they are completed in a timelier manner rather than, in this instance, all reports generated over the two years being released all at once. This would greatly assist local Parishes. The Joint Rural Parishes are to submit a more detailed feedback on the Local Plan on our behalf, all of which Marr Parish Meeting fully supports and endorses.

### Summary:

To aid future consultations, it is suggested that Local Plan reports should be made publically available when they are completed rather than being released all at once during one consultation.

### Response:

Comments are noted - the vast majority of the local plan evidence base was published alongside the 2018 consultation. It is not always possible to publish documents on an ad-hoc basis as there are democratic and constitutional decision-making processes that must be followed. For example, the decision to publish the Local Plan (Reg 19) is a Full Council function. The documents were made available for a period of 7 weeks, which is considered as being reasonable, and in line with the Statement of Community Involvement. It is noted that the Planning Regulations only require a 6 week consultation.
Wadworth Parish Council have no comments to make.

Response:
Noted
Public consultation took place in July 2015 when High Melton College was operational as outlined in Doncaster Infrastructure Strategy Annex, Education Learning Chapter 2 page 15 2.22 Education. Developments/changes since that time will have a major impact on the everyday life of local residents and no further consultation has taken place. The site went up for sale in 2017 and since then a preferred bidder has been on the scene for 2 years and other than securing a grant from Sheffield City Region of £4.1 million (Chapter 8 6.4) no further action has taken place and the site remains semi-derelict in the ownership of DN Colleges Group. Chapter 6, Community, Sports and Culture Facilities page 61, Local residents are well aware that in the event that this development proceeds there will be a need to build large sound studios on Greenbelt land. DMBC by agreeing to contribute £2.1 million to this development are approving the development of this project on this site without any consultation with residents or Parish Council or any reference to permission needed from Secretary of State. (Contrary to National Policy Framework White Paper 2012 1.39 ref Greenbelt land.) By doing so, DMBC has not followed national planning policy and additionally by not disclosing "special circumstance" for the use of this Greenbelt land DMBC are being not compliant with this legislation. There is ambiguity in the Doncaster Infrastructure Strategy document regarding the status (as at September 2019) of the High Melton College site. Is a one-off consultation adequate in these dynamic changing times? PROPOSED CHANGE Clarity on the status of the High Melton College site is needed. The site is neither operational as a college, nor does it appear to be in development as a media venture. There is indeed uncertainty as to whether this preferred bidder has the capacity to raise the funds to go ahead with this development. Acknowledgement that in some circumstance on-going consultation is needed to meet with the requirement of Statement of Community Involvement. (Town and Parish Councils page 7 3.22) Transparency on the status of Greenbelt land is required not an arbitrary re-designation of Greenbelt land to ‘formerly’ Greenbelt land. (Settlement Profile Table H2(P) and H2 (K)

Summary:
Clarity is sought as to the Local Plan status of the former High Melton College site following its closure and subsequent proposals to redevelop the site for film studio, noting the outdated reference within the Infrastructure Strategy to it being an operational college. Concern should the site be removed from the Green Belt.

Response:
The site is currently designated as Green Belt in the current development plan (UDP) and is remaining in the Green Belt as per the local plan. Any proposal therefore would need to comply with national planning policy and demonstrate very special circumstances.
Comment Ref: C/Joint Rural Parishes/01394/1/003
Attend Examination:
Reason:
Area: General Comments
Policy: Supports Joint Rural Parishes Response

Tests of Soundness:

Comment:
Our second point in this exercise is to highlight the work of, and endorse the consultation response of the Joint Rural Parishes Group. By now you will have received their formal response to consultation which we have been involved with. We endorse their submission and commend it to inspection.

Summary:
The consultation response of the Joint Rural Parishes Group is endorsed and supported.

Response:
Noted
Our second point in this exercise is to highlight the work of, and endorse the consultation response of the Joint Rural Parishes Group. By now you will have received their formal response to consultation which we have been involved with. We endorse their submission and commend it to inspection.

The consultation response of the Joint Rural Parishes Group is endorsed and supported.

Noted
The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination, the 2013 Mid Sussex Core Strategy Examination and the 2016 St Albans Local Plan Examination, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption or withdrawal of the Plan. Whilst Gladman recognises that the Duty to Cooperate is a process of ongoing engagement and collaboration as set out in the PPG, it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Doncaster Council must be able to demonstrate that they have engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues. This is not simply an issue of consultation but a question of effective cooperation. The need to positively plan to meet full housing, development and infrastructure needs across neighbouring local authority areas should not be underestimated. It is all too easy for the duty to cooperate to be seen as an administrative exercise, however the fundamental social and economic need to ensure a supply of land for good quality housing and employment uses to meet requirements across a wider area is a key issue that must be addressed appropriately through the plan making process. Whilst it may be the case that a local planning authority has sought to work positively with its neighbours, the extent to which a plan tackles strategic priorities that arise from that strategic cross-boundary working and its associated evidence base are issues to be explored and considered from an early stage in the plan making process and ultimately in assessing the soundness of the Local Plan. Important cross-boundary issues should not simply be deferred for consideration at a later date.

Summary:

Refers to the need for the Local Plan to satisfy the requirements of the Duty to Cooperate and in particular to plan positively to meet full housing, development and infrastructure needs.

Response:

Comments are generic and not specific to Doncaster’s local plan and the Duty to Cooperate.
Comment:
Apologies for the delay in getting back to you. I have looked at your draft SOCG and my only comment is why Selby is not included in agreement 4 relating to Gypsy and Traveller provision. As a neighbouring authority, surely there is the potential for cross-boundary impacts?

Summary:
Have looked at the draft SOCG - why is Selby not included in agreement 4 relating to Gypsy and Traveller provision. Surely there is the potential for cross-boundary impacts?

Response:
Noted and agreed. The Statement of Common Ground has been amended to include Selby in Agreement 4.
Comment:

Thanks for the amendments to the SoCG to address the concerns we raised. Having read through the revised draft then subject to their being no further fundamental changes we would be happy to sign up to the relevant agreements identified for Rotherham. I can confirm that the signatory would be Councillor Denise Elliott: Cabinet Member - Jobs and the Local Economy. We would expect to take a briefing note to Cllr Elliott and the Leader to endorse sign up to the final SoCG, and we do have monthly briefing meetings with Cabinet Member so I would not envisage the sign off taking too long from our side of things. We are hoping to let you have some comments on the Publication Local Plan too in due course.

Summary:

Thanks for the amendments to the SoCG to address the concerns we raised. Subject to there being no further fundamental changes we would be happy to sign up to the relevant agreements identified for Rotherham. The signatory would be Councillor Denise Elliott: Cabinet Member - Jobs and the Local Economy. We would expect to take a briefing note to Cllr Elliott and the Leader to endorse sign up to the final SoCG, and we do have monthly briefing meetings with Cabinet Member so would not envisage the sign off taking too long from our side of things.

Response:

Noted. Support is welcomed.
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Comment:
We are fine with the amended version. My only queries are in relation to the section about the Joint Waste Plan. Paragraph 82 (shown below) refers to the authorities preparing a Memorandum of Understanding. Should this be Statement of Common Ground? Also beyond a SOCG do we need a formal legal agreement? Waste Management (ref 17) 82. Doncaster previously co-operated with Barnsley and Rotherham Councils to produce the Joint Waste Core Strategy, adopted in 2012 and continue to co-operate in the ongoing monitoring of the Plan. Doncaster contributes to ongoing co-operation regarding waste through the Yorkshire and Humber Waste Technical Advisory Board. The authorities of Doncaster, Rotherham, Barnsley and Sheffield are working towards producing a new Joint Waste Local Plan. The authorities are currently procuring consultants to produce an initial evidence base to identify what is needed and will use this information to identify the next stages of the project. All the authorities still need to sign up to a memorandum of understanding and legal agreement directly relating to the production of the Joint Waste Local Plan.

Summary:
Fine with the amended version of the Statement of Common Ground. Paragraph 82 of the current Statement of Common Ground refers to a Memorandum of Understanding, should this refer to a Statement of Common Ground instead?

Response:
Noted. A Memorandum of Understanding will be produced in the interim in order to produce the Waste Plan. A Statement of Common Ground will be produced after that.
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East Riding welcomes the changes that have been made to this draft Statement of Common Ground based on our earlier comments. However, in line with the comments above regarding minerals and aggregate supply and earlier comments referring to how Doncaster calculates its aggregate landbanks in the LAA, the Council would recommend changes to Agreements 19.3 and 19.7 as follows:

Recommendations for Agreement 19.3:
The Text in this agreement be amended to read (tracked changes in red - COLOUR CANNOT BE SHOWN SO SHOWN AS CAPITAL): "That there are national, regional and sub-regional concerns regarding the supply of concreting aggregates, namely sharp sand and gravel. Doncaster, Nottinghamshire, North Yorkshire and East Riding’s supply of sharp sand and gravel is declining. SUBJECT TO SHORTAGES IN AGGREGATE SUPPLY BEING RECOGNISED AS PART OF LANDBANK CALCULATIONS WITHIN DONCASTER’S LAA IT IS ACKNOWLEDGED THAT resources from other areas may be required (in the long term) to provide additional imports into the South Yorkshire sub-region to meet Local Plan requirements. This raises concerns of accelerated resource depletion. THE LANDBANK DROPPING BELOW THE 7 YEAR LEVEL FOR SAND AND GRAVEL AND 10 YEARS FOR CRUSHED ROCK WOULD BE A GOOD INDICATOR OF AGGREGATE SHORTAGES IN THE BOROUGH". It is noted that the agreement references ‘Local Plan requirements’. However in reviewing the Publication Draft Local Plan, no reference to what the requirements are could be clearly found. Recommendations for Agreement 19.7: - Should refer to ‘each non-primary aggregate producing authority’. - Add ‘for example by making greater use of secondary and recycled aggregates, where possible after the bracketed section of the agreement. - At the end should refer to ‘primary aggregate producing authorities’ rather than ‘Mineral Planning Authority areas’.

If the changes suggested above can be made, I can confirm that East Riding will be happy to sign up to this statement of Common Ground, subject to agreement with our Portfolio Holder for Enhancing Communities. I can also confirm that East Riding Council will be able to sign this Statement of Common Ground, within 1 month of you sending the request to us with the final version of the Statement.

The comprehensive evidence base identifies the land bank is not the ‘principle’ indicator in Doncaster for identifying an issue with the security of aggregate mineral supply. This is identified by the depleting reserve and supporting evidence base documents, which reiterates the sharp sand and gravel required for concrete forms only 20 to 30% of the 5.6Mt reserve. There is no requirement in the NPPF / NPPG or the Managed Aggregates Supply System (MASS) that requires the setting of a fixed uplifted figure to ensure the land bank decreases to show an issue with security of supply. The MASS does not work for Doncaster. As sand and gravel sites go ‘off line’ and are not replaced (due to resource depletion) output will continue to decline and give the false impression of a long land bank. Doncaster will provide a separate note in the SoCG identifying what East Riding agree and disagree on.
I can confirm that North Lincolnshire Council is content with the Revised Draft Statement of Common Ground and that there are no further issues that the council wishes to raise on this document or the Publication Version of the Doncaster Local Plan.

Response:
Noted. No changes needed
Comment Ref: C/Common Ground/0014/15/017
Attend Examination: Not Stated

Reason:
Area: Duty to Cooperate
Policy: Statement of Common Ground

Tests of Soundness:

Comment:
We have reviewed the revised draft statement and have no comments or amendments to make. We are happy to sign up to the document.

Summary:
Statement of Common Ground - reviewed the revised draft and have no comments and will be happy to sign up

Response:
Noted and support welcomed
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<td>Test of Soundness</td>
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**Comment:**

The SYPTE provided a tracked changes version of the Draft Statement of Common Ground. In summary, they want the following added in to the document: 1. Para 69 should include reference to 'bus, tram, tram/train and train; 2. the Section on Rail should include a specific reference to local rail (service and infrastructure); and 3. have asked for 'SYPTE' to be inserted into Agreement 8, 9 and 10.

**Response:**

Noted. Appropriate amendments have been made to the Statement of Common Ground.
Comment:
Regarding the revised draft of your SOCG, thank you for taking account of most of our previous comments and suggestions. There is just one, regarding Waste management that we would like you to include, as per our previous submission as the revised version of the SOCG does not appear to have fully picked up on this. The text of your revised SoCG states “This is relevant but SCC have not yet formally confirmed their intention to prepare a joint Waste Plan. We recognise the importance of working with neighbouring authorities and are working jointly with them on producing a brief to procure a waste plan evidence base, ahead of any commitment to produce a joint plan.” As it is currently worded, in the revised version noted above and in the previous version SCC would have to disagree with that statement and would suggest replacing with the text previously suggested (see extract below). Appendix 2: Item 17 in the table - 'Waste Management' Our previous comments were as follows: 17) Waste Management This is relevant but SCC have not yet formally confirmed their intention to prepare a joint Waste Plan. We recognise the importance of working with neighbouring authorities and are working jointly with them on producing a brief to procure a waste plan evidence base, ahead of any commitment to produce a joint plan. As it is currently worded, SCC would have to disagree with this statement and would suggest replacing it with the following text: 'Work with the South Yorkshire authorities to undertake joint research into waste planning issues and investigate the potential of creating a new joint Waste Plan. Liaise with other relevant authorities as and when required.'

Response:
Noted and agreed. The Waste section of the Statement of Common Ground has been amended accordingly.
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<td>Statement of Common Ground</td>
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<td><strong>Tests of Soundness:</strong></td>
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<td><strong>Comment:</strong></td>
<td>Happy with Rotherham MBC and Barnsley MBC suggestion re amendment and correction. The reason for the proposed change to the wording from us was to clarify that whilst we are producing a joint evidence base we haven't as yet agreed to using that to produce a new joint Waste Plan.</td>
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<tr>
<td><strong>Summary:</strong></td>
<td>Happy with Rotherham and Barnsley Council's suggested amendments and corrections. The reason for this is that whilst we are producing a joint evidence base we haven't yet agreed to using that to produce a new joint Waste Plan.</td>
</tr>
<tr>
<td><strong>Response:</strong></td>
<td>Noted. Appropriate changes have been made to the Statement of Common Ground.</td>
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Comment:

Thank you for asking Wakefield Council to provide comments on the revised draft of the Doncaster Local Plan Statement of Common Ground. I can confirm that the Council have no further comments on the draft. As set out in the document our portfolio holder Cllr. Denise Jeffery will sign the final version when it is produced. This should take around 1 month as it will need to go to Cabinet Member Briefing. If this time scale is an issue for you please let us know when you send through the final version as we may be able to expedite the process.

Summary:

Wakefield Council have no further comments to make on the revised draft Statement of Common Ground. The relevant Portfolio Holder will sign the final version when it is produced.

Response:

Noted.
Agreement 7 states that 'A Memorandum of Understanding with Highways England may be required after Local Plan Adoption if mitigation cannot be agreed during plan preparation.' This agreement presents concern for Highways England given that in order to understand whether the Local Plan is sound, it is necessary to identify the scale of highways improvements required to accommodate Local Plan traffic and that there is confidence that they can be delivered. This should be determined before the plan is adopted. **PROPOSED CHANGE** Highways England would like to see this reference removed from Agreement 7. It is important to ascertain that it is possible for the cumulative impacts of the Local Plan development traffic to be accommodated on the SRN, either without mitigation or with mitigation on a scale that is deliverable. This needs to be determined prior to the adoption of the plan. The general principles (relevant to the Strategic Road Network) set out in the Local Plan Publication Version document and the Draft Statement of Common Ground are generally supported by Highways England, but the cumulative impact of the Local Plan upon the SRN is yet to be fully assessed. Highways England is currently working with Doncaster Council on the cumulative impact assessment to determine the principle of the mitigation requirements prior to EIP. The high level mitigation requirements can then be linked to the appropriate allocated sites and should form part of the Doncaster IDP. High level cost estimates are also to be produced. These costs are not intended to be published within the plan, but used as a guide to determine deliverability i.e. the soundness of the plan. Potential funding mechanisms for any necessary mitigation will also need to be outlined in the IDP.

**Summary:**

Highways England are concerned about Agreement 7 which states a Memorandum of Understanding may be required if mitigation cannot be agreed during plan preparation. In order to understand whether the plan is sound, it is necessary to understand the scale of highways improvements required to accommodate additional traffic and be sure they can be delivered. This should be determined before adoption. Proposed change: This reference should be removed from Agreement 7. It is important to ascertain that it is possible for the cumulative impacts of the Local Plan to be accommodated in the SRN, with or without mitigation, but this must be determined prior to the adoption of the plan. The general principles set out in the Local Plan and draft Statement of Common Ground but the cumulative impacts are yet to be fully assessed. Highways England is working with DMBC to this end, prior to Examination. High level mitigation can be linked to the appropriate allocated sites and should form part of the Infrastructure Delivery Plan. High level cost estimates will also be produced. These costs will are not intended to be published in the plan, but are a guide to determine deliverability (soundness). Potential funding mechanisms and mitigation will need to be outlined in the Infrastructure Delivery Plan.

**Response:**

Noted. Work is ongoing with Highways England and the Statement of Common Ground has been updated accordingly.
The Agreements identified within the Revised Draft SoCG that require Highways England to be a signatory are Agreements 3, 6 and 7. The principles of Agreements 3 and 6 appear appropriate and as such Highways England could sign these agreements. However, it is noted that there is a typo in Agreement 6 that needs to be addressed. This Agreement should read ”?..to ensure adequate infrastructure is provided to meet the scale and location of employment need.” The wording of Agreement 7 is unacceptable for Highways England. It is advised that the reference to “a MoU with Highways England may be required after Local Plan Adoption if mitigation cannot be agreed during plan preparation” should be removed from Agreement 7, before Highways England can agree to it.

Comments noted. The typo in Agreement 6 has been corrected as requested. A reference to an MoU has been removed from the Statement of Common Ground and words have been agreed by Highways England for a revised Agreement 7.
The County Council welcomes the opportunity to provide comments and considers this part of the on-going dialogue on cross-boundary strategic matters required under the Duty to Cooperate. Pleased to see the Plan progress to this advance stage through to submission.

Response:
Comments noted
Tests of Soundness:

Comment:

2.1 The Statement of Common Ground is currently in draft, with no signatories. It is noted that at the time of writing the Council's page identifies that there remain unresolved issues which will require further change. The extent and scope of these issues is not wholly clear. 2.2 Our client's interests in relation to the Statement of Common Ground primarily relate to accommodating housing needs. Table 2 of the Statement of Common Ground indicates that to date no neighbouring authorities are able to assist Doncaster in meeting its housing need. Likewise, Doncaster is not proposing to meet the needs of any neighbouring authorities. 2.3 Several neighbouring authorities, such as Sheffield, East Riding, Selby and Rotherham are in the process of updating their existing plans. It is, therefore, possible that these authorities may require assistance in the future. The Statement of Common Ground correctly states that the issue of housing need will be kept under review. Therefore, whilst our client does not wish to object to this issue at present, we reserve the right to make further comments at a later date.

Summary:
The SOCG is still draft and has no signatories. In respect to housing needs it states that Doncaster is not expecting any other authority to take any of its housing needs, and likewise is not planning to accommodate any neighbouring authorities need. Sheffield, East Riding, Selby and Rotherham are all in the process of updating their plans so therefore possible that they may require assistance in the future and the SOCG identifies that this will rightly be kept under review. Reserve the right to make further comments in due course.

Response:

Noted. The Statement of Common Ground concerns this iteration of the Local Plan. It will updated as and when a review of the Local Plan takes place.
The AWP decided that it was not appropriate to be a formal signatory to our Statement of Common Ground and instead should note the preparation of the SCG and a minute of the meeting to this effect should be appended to the SCG. The SCG will therefore reference this. I gather this approach has been taken in the SE and E of England AWPs to other SCG. The reasoning behind this is that the AWP does not get involved as a formal consultee on the development of Minerals Plans and is a technical body not a policy making one. As such it helps provide the background evidence for DTC discussions between authorities. As it involves the industry side also, the MPA and operators present did not consider they could be seen to "certify" any Plan in such a way when members/MPA may be raising formal objections. There was some discussion that the reference to AWPs within the MHCLG guidance resulted from lack of appreciation of this point.

Response:
Comment noted
Apologies for the very late response to your Statement of Common Ground (SCG) document from earlier this summer. Due to ongoing work on the remaining marine plan document drafting and limited staff resources during the summer, I am only able to reply in person to you now. I realise that the deadline for commenting on your SCG has passed, but wanted to make contact now to help with the future development of your plan/SCG. Your plan mentions that: “The following Prescribed Bodies have been consulted throughout the Local Plan preparation process and to date no response or communication has been received. Therefore, they are not mentioned further in this Statement. The bodies are: - Civil Aviation Authority - Marine Management Organisation. ” As you will note below this email, we did send a pro forma response to your email below, which would have been the case for any invitation to consult on your local plans that might have been sent to the MMO. I wonder whether this email might have ended up in a spam folder possibly? While we note your efforts to meet the Duty to Cooperate and appreciate the engagement, we do not consider there to be any significantly relevant cross-boundary issues arising from the Doncaster Local Plan to warrant agreement on a SCG. Issues to do with water quality and flooding in your area fall under the EA/other local authorities’ remit.

Summary:
Due to ongoing work on the marine plan I am only able to reply in person to you now. The Statement of Common Ground mentions that: "The following Prescribed Bodies have been consulted throughout the Local Plan preparation process and to date no response or communication has been received. Therefore, they are not mentioned further in this Statement. The bodies are: - Civil Aviation Authority - Marine Management Organisation." We did send a pro forma response to your email which would have been the case for any invitation to consult on your local plans that might have been sent to the MMO. Did this email end up in a spam folder? We note your efforts to meet the Duty to Cooperate and appreciate the engagement and do not consider there to be any significantly relevant cross-boundary issues arising from the Doncaster Local Plan to warrant agreement on a Statement of Common Ground. Issues to do with water quality and flooding in your area fall under the EA/other local authorities' remit.

Response:
Noted. The Statement of Common Ground has been amended to show that the Marine Management Organisation do not consider that there are any significant relevant cross-boundary issues arising from the Doncaster Local Plan.
Doncaster Council has been very supportive in helping to develop and agree an SCR wide Statement of Common Ground. This addresses strategic planning matters at the SCR scale and reflects all the points made above. A draft version of the SCR Statement of Common Ground was discussed at the Infrastructure Board in July 2019 and is due to be formally agreed later this year. I am happy that the draft Doncaster Statement of Common Ground is being developed to be consistent with the SCR Statement of Common Ground and look forward to both being finalised.

Summary:
Doncaster Council has been very supportive in helping to develop and agree an SCR wide Statement of Common Ground. It addresses strategic planning matters and a draft version was discussed at the Infrastructure Board in July 2019 and will be formally agreed later this year. Happy that the draft Doncaster Statement of Common Ground is being developed to be consistent with the SCR Statement of Common Ground.

Response:
Noted. The support given by Sheffield City Region/Mayoral Combined Authority is welcomed.
Comment:

I object to the wording on page 3 of the Doncaster Local Plan 2018 as below:-

Looking Further Ahead 1.11 Improved understanding of residual flood risk to the Main Town of Thorne-Moorends following completion of Hydraulic Modelling being finalised by the Environment Agency at the time of Plan preparation. The lack of detailed modelling available prior to adoption of this version of the Local Plan's evidence base at that point.

I asked the Environment Agency to explain the above paragraph as with use of words such as 'completion' and 'finalised' it is difficult to work out whether the Hydraulic modelling has been completed. The whole wording of the paragraph is confusing and it shouldn't be and it certainly, to me reads that it has been completed. The Environment Agency, via an FOI request, sent me the following information which clarified that the Hydraulic Modelling was still in production. See following statement from the Environment Agency dated 17th September 2019.

The Hydraulic Modelling mentioned in paragraph 1.11 on pages 2 and 3 of the current local plan (publication version) is still in production. Once finalised and published it will provide a better understanding of flood risk in the borough, particularly round Thorne Moorends, however as it is still in production it couldn't be used by the Council to provide the evidence base. The Environment Agency made it easy it to understand.

Summary:

_objects to allocation of site 001. Hydraulic modelling is not complete as LP (page 11) states. EA has confirmed that modelling is not complete. Feels that this is misleading.

Response:

Section 1.11 'Looking further ahead' of the LP states that Hydraulic Modelling is being 'finalised' by the Environment Agency at time of the Plan preparation. It does not say the modelling is complete.
Comment: This Paragraph provides a good summary of the range and wealth of heritage assets across the Borough.

Summary: This Paragraph provides a good summary of the range and wealth of heritage assets across the Borough.

Response: Responses to Representations in respect to SA are set out in the Wood Environment & Infrastructure SA Report Addendum
We would endorse the identification of safeguarding Doncaster’s historic environment as being one of the Challenges for the Borough.
Comment:
Doncaster’s historic environment offers huge potential for the Borough in terms of helping to create distinctive, attractive places for people to live in, work in and visit. This ought to be recognised with the Opportunities. PROPOSED CHANGE Add the following to Table 1, Opportunities:
"Using the historic environment to create distinctive, attractive places"

Summary:
"Unsound" - Doncaster’s historic environment offers huge potential for the Borough in terms of helping to create distinctive, attractive places for people to live in, work in and visit. This ought to be recognised with the Opportunities. PROPOSED CHANGE Add the following to Table 1, Opportunities: "Using the historic environment to create distinctive, attractive places"

Response:
It is proposed to accept the proposed additional wording to Table 1 (Opportunities - Environmental section) as a minor non-material amendment to the Local Plan - proposed wording has therefore been included in the Schedule of Minor Non-material Amendments submitted alongside the Local Plan.
We would endorse the identification of Doncaster's high environmental quality and its rich and diverse historic environment being two of the Strengths of the Borough.

Summary:
Supports as 'sound' - We would endorse the identification of Doncaster’s high environmental quality and its rich and diverse historic environment being two of the Strengths of the Borough.

Response:
Support welcomed
### Tests of Soundness

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### Comment

One of the weaknesses of the area are the numbers of heritage assets that have been identified as being at risk. For example, Doncaster has the second-highest number of Conservation Areas at risk in Yorkshire. **PROPOSED CHANGE:** Table 1, Weaknesses insert: "Number of heritage assets identified as being 'at risk'"  

### Summary

'Unsound' - One of the weaknesses of the area are the numbers of heritage assets that have been identified as being at risk. For example, Doncaster has the second-highest number of Conservation Areas at risk in Yorkshire. **PROPOSED CHANGE:** Table 1, Weaknesses insert: "Number of heritage assets identified as being 'at risk'"  

### Response

It is proposed to accept the proposed additional wording to Table 1 (Weaknesses - Environmental section) as a minor non-material amendment to the Local Plan - proposed wording has therefore been included in the Schedule of Minor Non-material Amendments submitted alongside the Local Plan.
Anglian Water would wish to reserve our right to appear to serve our interest as a water and sewerage undertaker.

Tests of Soundness:

Comment:
The majority of the Doncaster area is served by Yorkshire Water and Severn Trent Water. Anglian Water is the sewerage undertaker for part of Doncaster Borough only (parishes of Auckley, Austerfield, Blaxton and Finningley) within and close to Doncaster Sheffield Airport. We are also the water undertaker for part of Finningley Parish. The following comments are submitted on behalf of Anglian Water and relate to our company area only. Objective 11: Anglian Water is supportive of the objective which relates growth in homes and jobs to new and improved infrastructure.

Summary:
Anglian Water is supportive of Objective 11 which relates growth in homes and jobs to new and improved infrastructure.

Response:
Comment Noted.
We support this Objective especially the encouragement given to the reuse of existing buildings and underused floorspace. This approach is not only sustainable but may also help to encourage the reuse of, and investment in, the Borough's underused heritage assets.

Summary:
'Sound'. We support this Objective especially the encouragement given to the reuse of existing buildings and underused floor space. This approach is not only sustainable but may also help to encourage the reuse of, and investment in, the Borough's underused heritage assets.

Response:
Support welcomed
The Doncaster Local Plan Publication consultation outlines 20 Objectives which will be used to guide and monitor delivery of the vision. It is important that the vision is capable of being delivered and that the Plan Objectives and Policies in the plan reflect the need to make the vision a reality. Broadly speaking, Gladman support the objectives set out in the Doncaster Plan. We do however consider that Plan Objective 4 requires rewording so as to ensure that it is not interpreted as meaning that development of brownfield land is prioritised over other sustainable development opportunities. The Council should seek to build upon mechanisms such as the Brownfield Register to encourage the re-use of previously developed land alongside greenfield opportunities.

Comment:

The Doncaster Local Plan Publication consultation outlines 20 Objectives which will be used to guide and monitor delivery of the vision. It is important that the vision is capable of being delivered and that the Plan Objectives and Policies in the plan reflect the need to make the vision a reality. Broadly speaking, Gladman support the objectives set out in the Doncaster Plan. We do however consider that Plan Objective 4 requires rewording so as to ensure that it is not interpreted as meaning that development of brownfield land is prioritised over other sustainable development opportunities. The Council should seek to build upon mechanisms such as the Brownfield Register to encourage the re-use of previously developed land alongside greenfield opportunities.

Response:

Comment noted. No proposed changes. It does not say the development of brownfield land is to be prioritised over other sustainable development opportunities. the objective encourages the re use of well located, underused brownfield sites and buildings.
We support this Objective. This will help to ensure that new development is of a high quality and reinforces the distinct identity of the various parts of Doncaster.
We support this Objective. Although the total number of designated heritage assets in Doncaster may be relatively small compared to some of the other authorities in Yorkshire, nonetheless, the area has a significant legacy of important buildings and features. It is important, therefore, that the plan sets out an appropriate strategy for the conservation of these assets.

Summary:

'Sound'. We support this Objective. Although the total number of designated heritage assets in Doncaster may be relatively small compared to some of the other authorities in Yorkshire, nonetheless, the area has a significant legacy of important buildings and features. It is important, therefore, that the plan sets out an appropriate strategy for the conservation of these assets.

Response:

Support welcomed
2.1 This section of the representation statement provides comment on the Local Plan Publication Version Consultation Document. 2.7 The vision seeks to ensure the sustainability of villages through appropriate development, yet there are no objectives which will ensure that the needs of rural villages will be met in accordance with paragraph 78 of the NPPF. Reference is only made to supporting the rural economy yet the housing needs of rural communities should also be supported. On this basis, the plan is not effective as the objectives should support the delivery of the vision.

Summary:
The vision seeks to ensure the sustainability of villages through appropriate development, yet there are no objectives which will ensure that the needs of rural villages will be met in accordance with paragraph 78 of the NPPF. Reference is only made to supporting the rural economy yet the housing needs of rural communities should also be supported. On this basis, the plan is not effective as the objectives should support the delivery of the vision.

Response:
Comment noted. The objectives serve as a ‘hook’ to hang the policies on. The Local Plan does focus new housing in the most sustainable locations. the settlement hierarchy identifies suitable locations for development including the main urban area, main towns and service towns & villages, and defined villages in rural locations. Smaller villages (in rural locations) also have infill opportunities. See policies 2, 3 and 26.
Severn Trent are supportive of Objectives 19 and 20. “Encourages more efficient use of natural resources including water and secure and maintain a steady and adequate supply of mineral resources to facilitate development.” “Protect and enhance the quality of our water and soil resources (including high grade agricultural land).” To enable water companies to provide potable water for future generations, including growth it will be vital that we start to use of water more sustainably, development has the potential to have an adverse impact through increased demand or the contamination of water sources. The introduction of water efficient technology through new development can help to mitigate the impacts on water supply. Through the implementation of Sustainable Drainage Systems, helps to pass surface water through new developments and back into the natural water cycle cleanly helping to protect the natural water cycle.

Response:
Support Noted.
We support the Vision especially the intention that, by 2035, Doncaster will:
- enhance the vitality of the town centres and the wider Borough making a more attractive, healthier, safer and more active place to live, visit and work;
- protect and enhance the natural and historic environment including our tourist attractions, with new developments taking account of their local surroundings and character;
The HBF is generally supportive of the bullet point within the vision states that states that Doncaster will 'meet our communities housing needs and aspirations focusing growth in the main urban area, main towns, service towns and larger villages providing a diverse range of homes'. Meeting the housing needs of the area is a key element of the plan, which will not only provide social benefits but is required if the Council is to meet its economic aspirations.

Support noted.
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**Comment:**
Gladman are supportive of the Council's vision for Doncaster to 2035. It is key that this positive vision remains within the Doncaster Local Plan and that it seeks to provide for economic growth and housing to meet the full needs of the Borough. Alongside this, it is fundamental that the associated infrastructure is planned for and delivered at the appropriate time.

**Summary:**
Gladman are supportive of the Council's vision for Doncaster to 2035. It is key that this positive vision remains within the Doncaster Local Plan and that it seeks to provide for economic growth and housing to meet the full needs of the Borough. Alongside this, it is fundamental that the associated infrastructure is planned for and delivered at the appropriate time.

**Response:**
Support noted.
Comment:
2.1 This section of the representation statement provides comment on the Local Plan Publication Version Consultation Document. 2.2 Paragraph 2.13 of the consultation document acknowledges that Doncaster is largely rural yet this is not reflected in the vision. 2.3 The vision should be amended to give greater recognition to the rural nature of the Borough and support development in these smaller communities. The vision only refers to ensuring the sustainability of villages and rural economy through appropriate development, yet the plan and the vision needs to facilitate that appropriate development through identifying suitable development sites in and adjoining the villages. 2.4 There is also no recognition in the vision that many of the small rural settlements are not in isolated locations and therefore services and facilities can be easily accessed from rural settlements. For example, residents of Clayton can readily access a range of shops and services in nearby Thurnscoe, which also has a train station thereby providing easy access to Doncaster. 2.5 Paragraph 78 of the NPPF supports this approach where it is stated that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. It is stated that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby. This approach would apply to Clayton and the nearby settlement of Thurnscoe. 2.6 The vision is not therefore consistent with national policy in the context of the rural nature of Doncaster as the vision should be supportive of sustainable development in rural areas.

Summary:
The Local Plan acknowledges that Doncaster is largely rural yet this is not reflected in the vision. The Vision should be amended to give great recognition to the rural nature of the Borough and support development in the smaller communities.

Response:
Comment noted. The objectives serve as a 'hook' to hang the policies on. The Local Plan does focus new housing in the most sustainable locations. the settlement hierarchy identifies suitable locations for development including the main urban area, main towns and service towns & villages, and defined villages in rural locations. Smaller villages (in rural locations) also have infill opportunities. See policies 2, 3 and 26.
We respond on behalf of our client, Theakston Estates Ltd (Theakston Estates), in relation to land at Scawsby Lane, Scawsby (ref 436) which is located within the Main Urban Area (MUA). We welcome the Council’s ambitious strategy, which ties in with the Sheffield City Growth Plan, for Doncaster to "become an important economic hub". Given Doncaster’s location in proximity to Doncaster Sheffield Airport, the East Coast Mainline and the strategic road network, there is a clear opportunity for Doncaster to become a leading centre in logistics, aviation, rail and civil engineering which is recognised in the vision. Investment and growth in transport infrastructure is a key component of the Northern Powerhouse initiative to make the cities of the north a powerhouse for the UK economy once more. Capitalising upon its excellent road and rail links, and the international connectivity offered by Robin Hood Airport, Doncaster has become an important logistics hub. Similarly, the financial and business sectors have grown significantly, alongside a focus on creative and digital industries, further diversifying and strengthening Doncaster’s economy.

The outlook for Doncaster, in this context, is extremely positive with the Borough forecast to experience significant economic and population growth in the future. There are 20 draft objectives proposed to realise this vision including 9, 10 and 11 relating to homes and communities. Objectives 9 and 10 require that "housing provision meets the housing need and aspirations by increasing the provision of new homes for all to meet current and future needs" and to "focus new homes primarily within the main urban area of Doncaster". Theakston Estates agrees with the approach to focus the delivery of new housing in the main urban area (MUA) as this is clearly the most appropriate and sustainable location for growth. However, as set out in our other responses (including those to draft Policies 2, 3 and 6), the plan does not currently meet these objectives as there is a clear shortfall of sites identified in the MUA. Furthermore, the draft Plan is currently seeking that at least 50% of new homes is delivered in the MUA; however, the 'Doncaster Council Core Strategy 2011-2028' (adopted May 2012) seeks a higher figure of closer to 64% in the MUA. PROPOSED CHANGE To ensure a sound Plan through ensuring that its strategy is consistent with the Plan’s vision and objectives, additional sites need to be identified and allocated within the Main Urban Area. This is discussed in response to Policies 2, 3 and 6.
Comment: Persimmon Homes support the general vision for the Borough. However, it is noted that the economic aspirations for the Borough do not align with the housing targets set. In order to meet economic growth aspirations, the Council should seek to deliver the required number of homes to provide for the necessary labour force. This point is discussed further below.

Summary: Persimmon Homes support the general vision for the Borough. However, it is noted that the economic aspirations for the Borough do not align with the housing targets set. In order to meet economic growth aspirations, the Council should seek to deliver the required number of homes to provide for the necessary labour force.

Response: Comment Noted.
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Comment Ref: C/Vision and Objectives/04288/1/004

Attend Examination: Attend Hearing

Reason: In order to explain further the rationale behind the suggested changes and be given the opportunity to respond to any changes the Council propose to make and any further evidence that is presented.

Area: Chapter 3: Our Vision for the Future

Policy: Vision & Objectives

Tests of Soundness: Positively prepared

Comment:

4.1 Peel supports the overall strategic Vision and Objectives of the LP and their emphasis on supporting a strong and productive economy within Doncaster and the wider region. These also refer to the need to focus on enhancing its distinctive strengths and assets to better connect Doncaster to other economies, alongside creating significant new job opportunities for local residents within a key economic hub. 4.2 Peel specifically welcomes the reference to Doncaster becoming a 'leading centre in logistics and aviation' and the willingness to harness the potential of the 'growth corridor' between the airport and Doncaster town centre. However the vision should also be specific that by 2030, the region’s international gateway airport (DSA), will have grown significantly in terms of passenger and cargo throughput and the range, extent and choice of flight destinations; the aim is for it to have developed into a genuine intercontinental gateway, with further scheduled intercontinental services beyond the already launched Trans-Atlantic destinations. Alongside an enlarged DSA will be a significant mixed-use growth area. Collectively, the Airport and the adjoining growth area are branded and identified as AeroCentre Yorkshire (ACY). In this context it is important to specifically identify that DSA/ACY is included within the growth corridor. The accompanying objectives and should be reworded to ensure consistency and clarity.

Summary:

Support the overall strategic vision and objectives of the plan and the emphasis on supporting a strong and productive economy. Specifically welcome the reference to Doncaster becoming a leading centre in logistics and aviation and the willingness to harness the potential of the growth corridor between the airport and town centre. The vision should also specify that by 2030 the airport will have grown significantly in passenger and cargo terms and developed into a genuine intercontinental gateway with new intercontinental services beyond those already launched. There will also be a significant mixed-use growth area alongside this. It is important to specifically identify the airport / AeroCentre Yorkshire in the growth corridor. The accompanying objectives should be reworded for consistency and clarity.

Response:

Comment Noted. No proposed change to the vision and objectives to make them more specific to one business. The Local Plan supports the sustainable growth of Doncaster Sheffield Airport in key proposals and with a policy in the Local Plan. See Local Plan summary page 2 and chapter 5.
We have no comment on the vision however some observations on the objectives; Objective 4 states; We have no argument with the sentiment of this objective but should be reworded to ensure existing business are not hampered in the ability to operate due to new development encroaching (agent of change principle NPPF para 182) as follows; Proposed Changes (deletions in strikethrough; new text in bold) - These cannot be shown therefore deletions shown in brackets with X either sides (x deleted text x) and new text in CAPITAL) encourage the re-use of sites and buildings, especially well located and underused brownfield land (e.g. redundant/unused land and empty properties) WHILE ENSURING ANY EXISTING BUSINESS /OPERATIONS ARE NOT PREJUDICED BECAUSE OF ANY SUCH NEW DEVELOPMENT, to help revitalise areas of low demand and stimulate growth;

**Summary:**
No comment on Vision. Proposed added text in capitals Objective 4. encourage the re-use of sites and buildings, especially well located and underused brownfield land (e.g. redundant/unused land and empty properties) WHILE ENSURING ANY EXISTING BUSINESS /OPERATIONS ARE NOT PREJUDICED BECAUSE OF ANY SUCH NEW DEVELOPMENT, to help revitalise areas of low demand and stimulate growth.

**Response:**
Comment noted. No proposed change. Policies in the Local Plan will consider the appropriateness of new development.
Comment:
2.1 The Local Plan sets a clear and ambitious vision for the future of the borough. The Local Plan is informed by the 'Team Doncaster' strategy 'Doncaster Growing Together'. This strategy has an over-arching vision for Doncaster to be a "thriving place to learn, work, live and care". The Local Plan (para. 3.4) clearly sets out that the vision is informed by the ambitions of the City Region, its Strategic Economic Plan as well the Northern Powerhouse. The vision is also supported by several clear outcomes, including: - be a more important economic hub with a stronger, more balanced and productive economy; - become a University City and ensured residents have the education and skills businesses need; - meet our communities housing needs and aspirations focusing growth in the main urban area, main towns, service towns and larger villages providing a diverse range of homes, services and improved links in between; - enhance the vitality of our existing town centres and the wider Borough making a more attractive, healthier, safer and more active place to live, visit and work; and - ensure the sustainability of villages and rural economy through appropriate development. 2.2 Our client is supportive of this vision and the identified outcomes. 2.3 The Local Plan and its policies must provide a positive framework for the future of the Borough; in a way that is aspirational but deliverable. The economic aspirations of the Borough are clear in their intent to expand existing and attract new business; become an important economic hub, a University City and a leading centre in logistics, aviation, rail and civil engineering. 2.4 The economic aspirations of the Borough must be matched by a clear commitment to deliver the area's future housing needs as a minimum. Objective 9 of the Local Plan seeks to; "ensure housing provision meets the housing need and aspirations by increasing the provision of new homes for all to meet current and future needs and create mixed and balanced communities." 2.5 Unfortunately, the proposed policies and strategy within the Local Plan do not meet this challenge. This clearly has implications for the soundness of the plan. Our client’s concerns are discussed in greater detail against the relevant policies below.

Summary:
Client is supportive of this vision and the identified outcomes. Economic aspirations of the Borough must be matched by a clear commitment to deliver the area’s future housing needs as a minimum. Proposed policies and strategy within the Local Plan do not meet this challenge resulting in soundness issues.

Response:
Comment noted. We acknowledge your support of this vision and outcomes.
2.4 We welcome the references in the Vision to Doncaster being an important economic hub with the goal of delivering a more balanced and productive economy, and having shaped economic success in line with Doncaster’s Inclusive Growth Strategy. 2.5 We do however consider that the wording in the Vision should be amended to align housing growth with the economic aspirations. This is partially covered in the Homes and Communities Objectives 9 to 11, however linkages between economic growth and housing could be better aligned in the Vision. 2.6 In relation to regeneration and community pride Objective 4 encourages the re-use of sites and buildings. It should be recognised that this encouragement does not constitute a prioritisation for brownfield land. There could be equally if not better located greenfield land that could “help revitalise areas of low demand and stimulate growth”, similar to brownfield sites, and this should be made clear.

Comment:

2.4 We welcome the references in the Vision to Doncaster being an important economic hub with the goal of delivering a more balanced and productive economy, and having shaped economic success in line with Doncaster’s Inclusive Growth Strategy. 2.5 We do however consider that the wording in the Vision should be amended to align housing growth with the economic aspirations. This is partially covered in the Homes and Communities Objectives 9 to 11, however linkages between economic growth and housing could be better aligned in the Vision. 2.6 In relation to regeneration and community pride Objective 4 encourages the re-use of sites and buildings. It should be recognised that this encouragement does not constitute a prioritisation for brownfield land. There could be equally if not better located greenfield land that could “help revitalise areas of low demand and stimulate growth”, similar to brownfield sites, and this should be made clear.

Response:

Comment noted. No proposed changes to objectives 4 and 9 to 11. The vision and objectives do align with the housing growth and economic aspirations of the borough. They are the 'hook' for the policies in the plan. Encouraging the re-use of sites and buildings, well located and underused brownfield land is a good objective to help revitalise areas and stimulate growth.
Comment:

2.4 We welcome the references in the Vision to Doncaster being an important economic hub with the goal of delivering a more balanced and productive economy, and having shaped economic success in line with Doncaster’s Inclusive Growth Strategy. 2.5 We do however consider that the wording in the Vision should be amended to align housing growth with the economic aspirations. This is partially covered in the Homes and Communities Objectives 9 to 11, however linkages between economic growth and housing could be better aligned in the Vision. 2.6 In relation to regeneration and community pride Objective 4 encourages the re-use of sites and buildings. It should be recognised that this encouragement does not constitute a prioritisation for brownfield land. There could be equally if not better located greenfield land that could "help revitalise areas of low demand and stimulate growth", similar to brownfield sites, and this should be made clear.

Summary:

Welcome references in the vision to Doncaster being an important economic hub with the goal of delivering a more balanced and productive economy, and having shaped economic success in line with Doncaster’s Inclusive growth strategy. The vision wording should be amended to align housing growth with economic aspirations. It should be acknowledged that for Objective 4, the encouragement of brownfield land does not constitute a prioritisation of it. There could be equal if not better located greenfield that could help revitalise areas of low demand and stimulate growth - this should be made clear.

Response:

Comment noted. No proposed changes to objectives 4 and 9 to 11. The vision and objectives do align with the housing growth and economic aspirations of the borough. They are the 'hook' for the policies in the plan. Encouraging the re-use of sites and buildings, well located and underused brownfield land is a good objective to help revitalise areas and stimulate growth.
UKOOG Response: Onshore oil and gas can make a positive contribution to Doncaster's vision and objectives, helping meet the aims of a Sustainable community. Specifically, the onshore industry can positively contribute towards the following objective areas; - Objective 1) 'encourage and support a competitive diverse and stable economy focusing' - Objective 2) 'create and improve access to high quality employment and training opportunities' - Objective 18) 'ensure that Doncaster adapts to the effects of climate change through careful planning and design of developments' - Objective 19) 'encourage more efficient use of natural resources';

Summary:
Chapter 3: Vision. Onshore oil and gas can make a positive contribution to Doncaster's vision and objectives, specifically objectives 1, 2, 18 and 19.

Response:
Comments Noted.
IGas is supportive of the development of a local plan for Doncaster, as it will establish the vision and objectives for development, including minerals, to 2035. IGas is of the view that onshore oil and gas can assist in achieving objectives 1 and 2. Further, IGas supports the intentions of 3.5 objective 17 to reduce the reliance on fossil fuels and minimise the impacts on climate change. IGas also supports the intentions of 3.5 Objective 19 to encourage the 'more efficient use of natural resources' and maintain a steady and adequate supply of mineral resources to facilitate development. IGas is of the view that onshore oil and gas development is compatible with this vision, specifically through the development of an adequate supply of domestic minerals under a regulatory environment superior to that of countries from which the UK imports its minerals. It is also important that the plan recognises the need to combat climate change. A domestic oil and gas supply offers significant carbon savings over fuels, which otherwise would be imported from overseas, possibly without regulatory regimes as strong as those in the UK, generating much needed local jobs in fields such as engineering and contributing to the transition towards a low carbon economy. Objective 19 could be enhanced by recognising that the more efficient use of natural mineral resources would contribute to the local and wider economy.

Summary:
Supports vision and objectives (IGas can support achieving objectives 1 and 2 and supports 3.5 to reduce reliance on fossil fuel. Objective 19 could be enhance to recognise the more efficient use of natural minerals to contribute to the local and wider economy)

Response:
Comment noted
3.1 The Local Plan sets a clear and ambitious vision for the future of the borough. The Local Plan is informed by the 'Team Doncaster' strategy 'Doncaster Growing Together'. This strategy has an over-arching vision for Doncaster to be a "thriving place to learn, work, live and care". The Local Plan (para. 3.4) clearly sets out that the vision is informed by the ambitions of the City Region, its Strategic Economic Plan as well the Northern Powerhouse. The vision is also supported by several clear outcomes, including: - be a more important economic hub with a stronger, more balanced and productive economy; - become a University City and ensured residents have the education and skills businesses need; - meet our communities housing needs and aspirations focusing growth in the main urban area, main towns, service towns and larger villages providing a diverse range of homes, services and improved links in between; - enhance the vitality of our existing town centres and the wider Borough making a more attractive, healthier, safer and more active place to live, visit and work; and - ensure the sustainability of villages and rural economy through appropriate development. 3.2 Our client is supportive of this vision and the identified outcomes. 3.3 The Local Plan and its policies must provide a positive framework for the future of the Borough; in a way that is aspirational but deliverable. The economic aspirations of the Borough are clear in their intent to expand existing and attract new business; become an important economic hub, a University City and a leading centre in logistics, aviation, rail and civil engineering. 3.4 The economic aspirations of the Borough must be matched by a clear commitment to deliver the area's future housing needs as a minimum. Objective 9 of the Local Plan seeks to; "ensure housing provision meets the housing need and aspirations by increasing the provision of new homes for all to meet current and future needs and create mixed and balanced communities." 3.5 Unfortunately, the proposed policies and strategy within the Local Plan do not meet this challenge. This clearly has implications for the soundness of the plan. Our client's concerns are discussed in greater detail against the relevant policies below.

Summary:
The Local Plan sets a clear and ambitious vision for the future of the borough. The Local Plan (para. 3.4) clearly sets out that the vision is informed by the ambitions of the City Region, its Strategic Economic Plan as well the Northern Powerhouse. The economic aspirations of the Borough must be matched by a clear commitment to deliver the area's future housing needs as a minimum. Unfortunately, the proposed policies and strategy within the Local Plan do not meet this challenge. This clearly has implications for the soundness of the plan.

Response:
Comment noted. We acknowledge your support of this vision and outcomes.
2.1 The Local Plan sets a clear and ambitious vision for the future of the borough. The Local Plan is informed by the 'Team Doncaster' strategy 'Doncaster Growing Together'. This strategy has an over-arching vision for Doncaster to be a "thriving place to learn, work, live and care". The Local Plan (para. 3.4) clearly sets out that the vision is informed by the ambitions of the City Region, its Strategic Economic Plan as well the Northern Powerhouse. The vision is also supported by several clear outcomes, including: - be a more important economic hub with a stronger, more balanced and productive economy; - become a University City and ensured residents have the education and skills businesses need; - meet our communities housing needs and aspirations focusing growth in the main urban area, main towns, service towns and larger villages providing a diverse range of homes, services and improved links in between; - enhance the vitality of our existing town centres and the wider Borough making a more attractive, healthier, safer and more active place to live, visit and work; and - ensure the sustainability of villages and rural economy through appropriate development.  

2.2 Our client is supportive of this vision and the identified outcomes.  

2.3 The Local Plan and its policies must provide a positive framework for the future of the Borough; in a way that is aspirational but deliverable. The economic aspirations of the Borough are clear in their intent to expand existing and attract new business; become an important economic hub, a University City and a leading centre in logistics, aviation, rail and civil engineering.  

2.4 The economic aspirations of the Borough must be matched by a clear commitment to deliver the area's future housing needs as a minimum. Objective 9 of the Local Plan seeks to; "ensure housing provision meets the housing need and aspirations by increasing the provision of new homes for all to meet current and future needs and create mixed and balanced communities."  

2.5 Unfortunately, the proposed policies and strategy within the Local Plan do not meet this challenge. This clearly has implications for the soundness of the plan. Our client's concerns are discussed in greater detail against the relevant policies below.

Summary:
Supportive of the vision and the identified outcomes, The economic aspirations are clear. They must be met by a clear commitment to deliver the areas future housing needs as a minimum, as per objective 9 of the Local Plan. The policies and strategy do not meet this challenge, which has implications for the soundness of the plan.

Response:
Comment noted. We acknowledge your support of this vision and outcomes.
Comment:  
2.1 The Local Plan sets a clear and ambitious vision for the future of the borough. The Local Plan is informed by the 'Team Doncaster' strategy 'Doncaster Growing Together'. This strategy has an over-arching vision for Doncaster to be a "thriving place to learn, work, live and care". The Local Plan (para. 3.4) clearly sets out that the vision is informed by the ambitions of the City Region, its Strategic Economic Plan as well the Northern Powerhouse. The vision is also supported by several clear outcomes, including: - be a more important economic hub with a stronger, more balanced and productive economy; - become a University City and ensured residents have the education and skills businesses need; - meet our communities housing needs and aspirations focusing growth in the main urban area, main towns, service towns and larger villages providing a diverse range of homes, services and improved links in between; - enhance the vitality of our existing town centres and the wider Borough making a more attractive, healthier, safer and more active place to live, visit and work; and - ensure the sustainability of villages and rural economy through appropriate development.  
2.2 Our client is supportive of this vision and the identified outcomes.  
2.3 The Local Plan and its policies must provide a positive framework for the future of the Borough; in a way that is aspirational but deliverable. The economic aspirations of the Borough are clear in their intent to expand existing and attract new business; become an important economic hub, a University City and a leading centre in logistics, aviation, rail and civil engineering.  
2.4 The economic aspirations of the Borough must be matched by a clear commitment to deliver the area's future housing needs as a minimum. Objective 9 of the Local Plan seeks to; "ensure housing provision meets the housing need and aspirations by increasing the provision of new homes for all to meet current and future needs and create mixed and balanced communities."  
2.5 Unfortunately, the proposed policies and strategy within the Local Plan do not meet this challenge. This clearly has implications for the soundness of the plan. Our client's concerns are discussed in greater detail against the relevant policies below.

Summary:  
Supportive of the vision and identified outcomes. The economic ambitions must be matched by a clear commitment to deliver the future housing needs as a minimum as Objective 9 states. Unfortunately the policies and strategy do not meet the challenge, which has soundness implications for the plan.

Response:  
Comment noted. We acknowledge your support of this vision and outcomes.
Comment:

Summary of Vision and Objectives 4.1 The Local Plan Strategy is 'Doncaster Growing Together'. It has one vision for Doncaster; ‘A thriving place to learn, work, live and care.’ 4.2 The Strategy has four themes to bring the vision to life: - Learning - Working - Living - Caring 4.3 Paragraph 3.3 of the Plan states that a key ambition of the Strategy is to use economic growth to ensure that all residents can participate in a strong and productive economy with higher living standards. 4.4 The Plan sets out a number of targets to assist the growth of Doncaster over the next 15 years. This includes ’investing in the future, encouraging existing businesses to expand. Soundness of Providing the Vision and Objectives 4.5 We support the proposed vision and objectives set out in Chapter 3 of the plan. It is considered the strategy is sound as it has been positively prepared.

Summary:
support the proposed vision and objectives set out in Chapter 3 of the plan

Response:

Comment noted. We acknowledge your support of this vision and objectives
Persimmon Homes support the general vision for the Borough. However, it is noted that the economic aspirations for the Borough do not align with the housing targets set. In order to meet economic growth aspirations, the Council should seek to deliver the required number of homes to provide for the necessary labour force. This point is discussed further below.

Comment:
Persimmon Homes support the general vision for the Borough. However, it is noted that the economic aspirations for the Borough do not align with the housing targets set. In order to meet economic growth aspirations, the Council should seek to deliver the required number of homes to provide for the necessary labour force.

Response:
Comment Noted.
We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Area: Chapter 3: Our Vision for the Future
Policy: Vision & Objectives

Comment:
Persimmon Homes support the general vision for the Borough. However, it is noted that the economic aspirations for the Borough do not align with the housing targets set. In order to meet economic growth aspirations, the Council should seek to deliver the required number of homes to provide for the necessary labour force. This point is discussed further below.

Summary:
Persimmon Homes support the general vision for the Borough. However, it is noted that the economic aspirations for the Borough do not align with the housing targets set. In order to meet economic growth aspirations, the Council should seek to deliver the required number of homes to provide for the necessary labour force.

Response:
Comment Noted.
Comment: 2.1 Our client is supportive of the vision which has been informed by the ambitions of the City Region, its Strategic Economic Plan as well the Northern Powerhouse. 2.4 The economic aspirations of the Borough must be matched by a clear commitment to deliver the area’s future housing needs as a minimum. Objective 9 of the Local Plan seeks to; “ensure housing provision meets the housing need and aspirations by increasing the provision of new homes for all to meet current and future needs and create mixed and balanced communities.” 2.5 Unfortunately, the proposed policies and strategy within the Local Plan do not meet this challenge. This clearly has implications for the soundness of the plan.

Summary:
Supports the vision which has been informed by the ambitions of the Sheffield City Region and the Strategic Economic Plan/Northern Powerhouse. Economic aspirations must be matched by a commitment to deliver the housing needs of the borough as a minimum. Unfortunately the proposed policies and strategy of the Local Plan does not meet this challenge.

Response:
Comment Noted.
Comment:

Summary of Vision and Objectives 4.1 The Local Plan Strategy is 'Doncaster Growing Together'. It has one vision for Doncaster; 'A thriving place to learn, work, live and care.' 4.2 The Strategy has four themes to bring the vision to life: - Learning - Working - Living - Caring 4.3 Paragraph 3.3 of the Plan states that a key ambition of the Strategy is to use economic growth to ensure that all residents can participate in a strong and productive economy with higher living standards. 4.4 The Plan sets out a number of targets to assist the growth of Doncaster over the next 15 years. This includes 'investing in the future, encouraging existing businesses to expand. Soundness of Providing the Vision and Objectives 4.5 We support the proposed vision and objectives set out in Chapter 3 of the plan. It is considered the strategy is sound as it has been positively prepared.

Response:

Comment noted. We acknowledge your support of this vision and objectives.
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<td>Policy: Policy 1: Presumption in Favour of Sustainable Development</td>
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**Comment:**

Gladman are fully supportive of the policy on Sustainable Development. The ethos of sustainable development is key to assessing planning proposals. This policy should provide assurance of a local approach to planning that will actively seek to improve the social, environmental and economic wellbeing of the area by ensuring that development demonstrably contributes to the specific strategy, local vision and objectives of the DLP. The ethos of achieving the delivery of sustainable development is key to assessing planning proposals and should also be reflected in the policy wording, as it is the key thread running through both the previous and revised Framework.

**Summary:**

Gladman are fully supportive of the policy on Sustainable Development. The ethos of sustainable development is key to assessing planning proposals. This policy should provide assurance of a local approach to planning that will actively seek to improve the social, environmental and economic wellbeing of the area by ensuring that development demonstrably contributes to the specific strategy, local vision and objectives of the DLP. The ethos of achieving the delivery of sustainable development is key to assessing planning proposals and should also be reflected in the policy wording, as it is the key thread running through both the previous and revised Framework.

**Response:**

Support noted.
Comment: Point B) sets out the following: B) Planning applications that accord with the policies in this plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay unless material considerations indicate otherwise. No reference is made to consulting with Statutory Consultees. PROPOSED CHANGE Following the adoption of the plan Highways England will still expect to be consulted on all planning applications that could potentially impact on the SRN. The traffic impact will need to be demonstrated and potentially mitigated. The principle of mitigation should be determined at the Plan stage and included within the IDP. The larger site allocations or those located close to the SRN may impact individually which will need to be assessed and potentially mitigated through the planning application process. Text could potentially be added stating that statutory consultees will be consulted.

Summary: Point B) makes no reference to statutory consultees. Proposed change: Highways England will still be expected to be consulted on all planning applications which impact on the SRN. The traffic impact will need to be demonstrated and potentially mitigated. This principle should be determined at Plan stage and included in the Infrastructure Delivery Plan. Large allocations or those close to the SRN may individually impact on the SRN and this will need to be assessed and potentially mitigated through the planning application process. Text could be added stating consultees will be consulted.

Response: There is no need to refer to consulting with statutory consultees in the policy wording or supporting text. As a statutory requirement this is required irrespective of the wording of any Local plan policy.
Comment: 2.1 Our Client welcomes the provision of a policy which sets out that development proposals will be considered in the context of the presumption in favour of sustainable development. However, as highlighted through previous consultation stages, the wording of the policy has too much repetition and parts b) and c) are unnecessary and should be deleted. Part a) of the policy quite rightly states that when considering development proposals the Council will take a positive approach which reflects the presumption in favour of sustainable development contained within the National Planning Policy Framework. That should be sufficient for the policy. 2.2 However, part b) and c) then set out the presumption in favour of sustainable development, but this does not accurately align the wording within the Framework. There is no reference to the presumption being subject to material considerations where proposals accord with policies in the plan. 2.3 Our Client recommends that the policy is revised and that parts b) and c) should be removed.

Summary:
Policy 1 - presumption in favour of sustainable development. 1. Supports policy but parts b & c should be deleted, as they are unnecessary. 2. Parts b&c do not accord with the plan in that the presumption 'being subject to material considerations where proposals accord with policies in the Plan'.

Response:
Paragraph 036 Reference ID: 61-036-20190723 of the 'Plan Making' section of National Planning Practice Guidance requires Local Plan to set out how they will apply the presumption in favour of sustainable development locally. When read in conjunction with NPPG para 11, Policy 1 sets out the key principles as to how it will do this.
Comment:

2.1 Our Client welcomes the provision of a policy which sets out that development proposals will be considered in the context of the presumption in favour of sustainable development. However, as highlighted through previous consultation stages, the wording of the policy has too much repetition and parts b) and c) are unnecessary and should be deleted. Part a) of the policy quite rightly states that when considering development proposals the Council will take a positive approach which reflects the presumption in favour of sustainable development contained within the National Planning Policy Framework. That should be sufficient for the policy. 2.2 However, part b) and c) then set out the presumption in favour of sustainable development, but this does not accurately align the wording within the Framework. There is no reference to the presumption being subject to material considerations where proposals accord with policies in the plan. 2.3 Our Client recommends that the policy is revised and that parts b) and c) should be removed.

Summary:

Policy 1 - presumption in favour of sustainable development. 1. Supports policy but parts b & should be deleted as they are unnecessary. 2. Parts b&C do not accord with the plan in that the presumption 'being subject to material considerations where proposals accord with policies in the Plan'.

Response:

Paragraph 036 Reference ID: 61-036-20190723 of the 'Plan Making' section of National Planning Practice Guidance requires Local Plan to set out how they will apply the presumption in favour of sustainable development locally. When read in conjunction with NPPG para 11, Policy 1 sets out the key principles as to how it will do this.
Comment: Draft Policy 1 and the importance of sustainable development is generally supported, as advocated by paragraph 8 of the NPPF. It is positive that DMBC has also focused on sustainable development, as discussed under policies 2 and 3. DMBC, in parallel with the NPPF, has set out part A) of the policy in relation to economic, social and environmental benefits therefore development options should be brought forward in this context. Neighbourhood Plans form an essential part of the Development Plan, however we would question part B of the policy which states 'that planning applications that accord with policies in this plan (and where relevant, with policies in neighbourhood plans) should be approved’. We would like to highlight that under paragraph 30 of the NPPF, the provisions are in place for DMBC to override the Neighbourhood Plans if particular circumstances dictate. Recommendation 1: Doncaster should continue to strive for sustainable development on the grounds of sustainability (economic, social and environmental) as well as provide further details on relationship between the Local Plan and Neighbourhood plan in the interests of consistency with national policy and justified plan making.

Summary:
Policy 1 is generally supported. It is positive that has also focussed on sustainable development as discussed under Policies 2 and 3. We question part B of Policy 1 which states ‘that planning applications that accord with policies in this plan (and where relevant, with policies in neighbourhood plans) should be approved’. NPPF Paragraph 30 says that provisions are in place for DMBC to override the Neighbourhood Plans if particular circumstances dictate. It is considered that the Council should continue to strive for sustainable development as well as provide further details on relationship between the Local Plan and Neighbourhood plan so to be consistent with national policy and justified plan making.

Response:
No change is considered necessary. Local Plan and NPPF policy is to be read together. There is no need to duplicate the wording of NPPF para 30 in Policy 1.
Comment: UKOOG supports the approach advocated in the draft policy that, 'Doncaster’s strategic approach is based on a desire to deliver sustainable growth; growth that is not for its own sake, but which brings benefits for all sectors of the community' and 'when considering development proposals, we will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework'. We believe that sustainable domestic development is of great importance to the UK. This is especially the case, as the plan makes clear, when it ‘brings benefits for all sectors of the community’. Failure to develop UK minerals in a sustainable and heavily regulated domestic environment will result in the offshoring of tax revenue, jobs, and our carbon emissions.

Summary:
Policy 1. Supports approach

Response:
Comment Noted
IGas supports Policy 1. Sustainable domestic development is of great importance to the UK. This is especially the case when it 'brings benefits for all sectors of the community'. Failure to develop minerals in a sustainable and heavily regulated domestic environment will result in the offshoring of tax revenue, jobs, and carbon emissions. It is important to recognise the contribution hydrocarbons can make in the transition to a zero carbon economy within the Plan period and to ensure the policies of the Plan are positively prepared in accordance with the NPPF. IGas has concerns that Policy 65 falls short of this requirement (see below).

**Summary:**
Policy 1 - supported. But must recognise the contribution that hydrocarbons make toward zero carbon economy and plan positively for hydrocarbons during plan period.

**Response:**
Comment noted. National Policy makes this connection
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.

**Summary:**
Policy 1 - welcome and support this policy. It is integral to ensuring the growth of the Borough is sustainable and improves the economic, social and environmental conditions of the area.

**Response:**
Noted. Support welcomed.
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**Comment:**

Attendance at the hearing will enable a thorough discussion regarding the deliverability of the strategy of the plan.

**Area:** Chapter 4: Strategic Approach

**Policy:** Policy 1: Presumption in Favour of Sustainable Development

**Reason:**

Summary of Sustainable Development Strategic Policy

4.6 Policy 1 of the Plan sets out the desire to deliver sustainable growth which brings benefits to all sectors of the community. The policy states that the Council will work with applicants to find solutions which mean that proposals can be approved wherever possible and to secure development that improves the economic, social and environmental conditions of the Borough. Soundness of the Scale of Development

4.7 We support the proposed approach to deliver sustainable growth which is in accordance with National Planning Policy Framework. It is considered the policy is sound and has been positively prepared.

**Response:**

Support noted
3.6. We generally agree with Draft Policy 1. In continuation to the NPPF (para 8), there is great importance on sustainable development and it is a positive move that DMBC has also focused on sustainable development, also discussed under policies 2 and 3. Doncaster in parallel with the NPPF has set out part A) of the policy in relation to economic, social and environmental benefits. Therefore development options should be brought forward in this context. 3.7. However whilst we agree Neighbourhood Plans form an essential part of the Development Plan, we would question part B of the policy which states ‘that planning applications that accord with policies in this plan (and where relevant, with policies in Neighbourhood plans) should be approved’. We would like to highlight that under paragraph 30 of the NPPF, the provisions are in place for DMBC to override the Neighbourhood Plans if particular circumstances dictate. Recommendation 1: Doncaster should continue to strive for sustainable development on the grounds of sustainability (economic, social and environmental) as well as provide further details on relationship between the Local Plan and Neighbourhood plan in the interests of consistency with national policy and justified plan making.

Response:
No change is considered necessary. Local Plan and NPPF policy is to be read together. There is no need to duplicate the wording of NPPF para 30 in Policy 1.
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<tr>
<th>CUSREF: 05311</th>
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<td>Date: 30/09/2019</td>
<td>Organisation: ID Planning</td>
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<td>Representing: Polypipe Building Products</td>
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**Comment Ref:** C/Policy 1/05311/1/005  
**Attend Examination:** Attend Hearing  
**Reason:** Attendance at the hearing will enable a thorough discussion regarding the deliverability of the strategy of the plan.

**Area:** Chapter 4: Strategic Approach  
**Policy:** Policy 1: Presumption in Favour of Sustainable Development

**Comment:**

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Summary of Sustainable Development Strategic Policy

4.6 Policy 1 of the Plan sets out the desire to deliver sustainable growth which brings benefits to all sectors of the community. The policy states that the Council will work with applicants to find solutions which mean that proposals can be approved wherever possible and to secure development that improves the economic, social and environmental conditions of the Borough.  

Soundness of the Scale of Development  
4.7 We support the proposed approach to deliver sustainable growth which is in accordance with National Planning Policy Framework. It is considered the policy is sound and has been positively prepared.

**Summary:**

We support the proposed approach to deliver sustainable growth which is in accordance with National Planning Policy Framework. It is considered the policy is sound and has been positively prepared.

**Response:** Support noted
The matters raised in our representation go to the heart of the Local Plan. It is considered that attendance at the relevant hearing sessions will allow further comment to be made where appropriate.

Area: Chapter 4: Strategic Approach
Policy: Policy 1: Presumption in Favour of Sustainable Development

Comment:
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.

Summary:

Response:
Support noted.
We welcome and support the inclusion of the additional explanation of 'appropriate locations' as a footnote within this policy, and provision of the explanation below the policy (paragraphs 4.17 and 4.18). We note the reference to the Flood Risk Topic Paper - our comments on the draft are given below.
Comment Ref:  C/Policy 2,Section 1 (Over/0016/28/010
Name: Historic England
CUSREF: 0016
Date: 04/09/2019
Organisation: Historic England
Reason: Tests of Soundness:
Area: Chapter 4: Strategic Approach
Policy: Policy 2: Spatial Strategy & Settlement Hierarchy
Tests of Soundness: Unsound - not stated
Comment:
Whilst there are clear advantages to directing proportionately more growth to the larger and more sustainable towns and villages, the scale of growth proposed for each settlement must be compatible with safeguarding its character and landscape setting. PROPOSED CHANGE Policy 2, Section 1 (Overall Strategy), first Paragraph, line 2 amend to read: “... sustainable growth, appropriate to the size of the individual settlements and their capacity to accommodate that growth without harm to their character or landscape setting, that meets the needs ?”
Response:
Historic England’s request for reference to safeguarding character landscape setting of settlements is not considered necessary as such matters, alongside a whole host of other spatial planning objectives, are considered through the Sustainability Appraisal process in terms of both quantum's and distribution of development and then individual sites.
We support the clarification of what constitutes an 'appropriate location' in terms of non-allocated sites. We also welcome the requirement that such proposals should not significantly harm the settlement's character or appearance nor its rural setting. These measures will help to ensure that any proposals which do come forward safeguard the distinctive character of Doncaster's towns and villages.

Summary:
'Sound'. We support the clarification of what constitutes an 'appropriate location' in terms of non-allocated sites. We also welcome the requirement that such proposals should not significantly harm the settlement's character or appearance nor its rural setting. These measures will help to ensure that any proposals which do come forward safeguard the distinctive character of Doncaster's towns and villages.

Response:
Support welcomed
Comment Ref: S/Policy 2, Section 5/0016/28/011
Attend Examination: Not Stated
Reason: 
Area: Chapter 4: Strategic Approach
Policy: Policy 2: Spatial Strategy & Settlement Hierarchy

Tests of Soundness:

Comment:
We support the requirements set out in Criteria B and C. These will help to ensure that any development in the countryside adjacent to the Development Limits safeguards the settlement character and its landscape setting.

Summary:
'Sound'. We support the requirements set out in Criteria B and C. These will help to ensure that any development in the countryside adjacent to the Development Limits safeguards the settlement character and its landscape setting.

Response:
Support welcomed
Not positively prepared to address the climate challenge. Not justified by the available evidence of the need to address the climate challenge. NPPF Para 148 states that "The planning system should shape places in ways that contribute to radical reductions in greenhouse gas emissions?" No Local Plan policy can be more important to place-shaping than the spatial strategy and settlement hierarchy. Policy 2 makes no reference at all to the climate challenge, when for the Plan to be sound it should feature strongly in the opening paragraph. Policy 2 (5): Countryside Not positively prepared to ensure that new development is consistent with the rest of the settlement hierarchy; Unsound because there is no spatial strategy for the countryside. The settlement hierarchy essentially defines 'countryside' as being land outside development limits, and that on that land 'proposals for new development in the countryside, including those which support the rural economy, will be supported where in accordance with Policy 26'. Policy 26 is basically a development management policy. It is therefore worrying that, within this headline strategic policy, the majority of the text on development in the countryside is dedicated to the basis on which exceptions to that expectation of development could be made. In other words, the Plan offers no spatial strategy for the countryside, other than to express where the characteristics of the countryside and the rural economy could be diluted or circumvented to enable 'non-rural' development. Considering that the majority of land in the Borough is in the countryside (some Green Belt, some not) this is an alarming omission. Looking in detail at clauses A-E of Policy 2(5), they actually have the effect of creating an additional tier of the settlement hierarchy - sites which are outside all but the smaller, level 4 settlements, but which are not allocated in the Plan. The proposal is therefore that, in the absence of a 5-year borough-wide supply of housing land, development outside, but adjacent to, settlements will be supported so long as they accord with other policies in the Plan. It is easy to see why this policy would be unacceptable in practice, and would also attract a great deal of attention from landowners seeking to extract value from their land. For example, let us suppose that a significant brownfield site in Balby was allocated in the Plan, and was envisaged to contribute to the 5-year land supply. If an applicant could demonstrate that site's delivery would be delayed, and that this reduced the Borough's land supply to slightly less than five years, that applicant could make a strong case that their greenfield site just outside say, Harlington, would be supported by Policy 2(5) - despite the fact that it would inevitably be providing housing for a very different sector of the market. Therefore this policy creates a direct incentive for landowners and developers to talk down the 5-year land supply in order to gain planning permission in rural locations. This would undermine other policies in the Plan, including Policy 26, and would have a tendency to weaken the implementation of the spatial strategy and settlement hierarchy by enabling less sustainably-located development. PROPOSED CHANGE - Reworking the first paragraph of Policy 2 as follows: Doncaster's Spatial Strategy will focus on delivering development that is appropriate to the size and needs of individual settlements, and better equips those settlements to achieve the radical reductions in greenhouse gas emissions required by national policy. This development should meet the needs for new homes and jobs, regenerate places and communities, support necessary infrastructure, services and facilities, and enable transformative improvements to carbon efficiency and opportunities for active travel. Please also see our comments on Chapter 9, wherein our recommendations for a sub-area approach may also affect the use of the settlement hierarchy. Policy 2(5) amending to: provide a stronger spatial vision for the Borough's countryside (see our comments on Chapter 9); specify that 'small scale residential developments may be considered for permission if adjacent to a development limit in levels 1-3 above, where?' delete clause E so that this policy is not triggered by the 5-year supply, and such sites are not assessed on the basis of their strategic contribution to housing land supply - since this should have been established by the Plan.

Summary:
The Local Plan is not positively prepared to address climate change and not justified by the available evidence of the need to address climate change. Policy 2 makes no reference to climate change despite being a place making policy. Policy 2 (5) - Countryside - is not positively prepared to ensure that new development is consistent with the rest of the settlement hierarchy and is unsound as there is no spatial strategy for the countryside. It is worrying that in Policy 2 and Policy 26 (cross referenced), the majority of text is on development in the countryside is dedicated to the basis on which exceptions for development can be made. The plan offers to countryside spatial strategy other than to express where the characteristics of the countryside and the rural economy could be diluted or circumnavigated by non-rural development. This is alarming given how much of Doncaster is countryside. Policy 2 (5) A-E actually creates an additional tier of the settlement hierarchy which could allow countryside development in the absence of a 5 year supply. This could be open to abuse by landowners who could delay delivery of urban brownfield land to open up the opportunity to deliver greenfield land, with no regard for locational or end user similarities. This is unacceptable in practice. The policy creates an incentive for landowners to take down the five year supply to gain permission in rural locations. This would undermine other Plan policies, including Policy 26 and would weaken the spatial strategy and settlement hierarchy by enabling less sustainably located development. Proposed change: Policy 2 should be reworded to say: "Doncaster's Spatial Strategy will focus on delivering development that is appropriate to the size and needs of individual settlements, and better equips those settlements to achieve the radical reductions in greenhouse gas emissions required by national policy. This development should meet the needs for new homes and jobs, regenerate places and communities, support necessary infrastructure, services and facilities, and enable transformative improvements to carbon efficiency and opportunities for active travel." Policy 2 (5) should be amended to provide a stronger spatial vision for the countryside and specify that ‘small scale residential developments may be considered for permission if adjacent to a development limit in levels 1-3 above, where?’ Clause E should
be deleted so that this policy is not triggered by the 5-year supply, and such sites are not assessed on the basis of their strategic contribution to housing land supply - since this should have been established by the Plan.

Response:

Addressing climate change is a theme that runs throughout the plan. It is the intention of countryside policies to specify what is acceptable development in the countryside, but this does not mean the intention is to erode this. The countryside is strongly protected in the plan, but a differentiation has to be identified. NPPF para. 78 requires the promotion of sustainable development in the countryside. In the event of the lack of a 5-year supply, such sites would inevitably come under pressure in any event. No proposed amendments to policy wording.

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<th>CUSREF: 0077</th>
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<td>Date: 30/09/2019</td>
<td>Organisation: Campaign to Protect Rural England South Yorkshire</td>
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Comment Ref: C/Policy 6 - Figure 2/0077/6/007

Reason: To assist the Inspector by using our submitted representations to answer his/her questions, particularly in light of the evidence submitted by other representors and any other matters the Inspector may raise.

Area: Chapter 4: Strategic Approach

Policy: Policy 2: Spatial Strategy & Settlement Hierarchy

Tests of Soundness: Positively prepared

Justified

Summary: Unsound because it fails to show the potential for rail connectedness of many settlements, with potential implications for the settlement hierarchy. The only rail route shown in Figure 2 is the East Coast Main Line. This means that relatively strong rail connectedness of the following settlements is not shown: Conisbrough, Mexborough, Bentley, Adwick-le-Street, Kirk Sandall, Hatfield-Stainforth, Thorne. This is not simply an oversight of graphical representation. It allows the reader to consider the relationship between different centres in the Borough without visualising how they connect to each other by rail, and the potential implications of that for how those centres may be expected to provide services to their areas, and the levels of growth that may be appropriate there. For example, if a significant number of residents in a community are to be encouraged to use rail travel and reduce car dependency, then it is important to have enough local facilities situated along the walking routes from local stations to residential neighbourhoods; and there is also a need to facilitate higher residential densities in those areas to support the local facilities and rail patronage. PROPOSED CHANGE Show the full rail network on Figure 2, and indicate how rail accessibility informs the provisions for different centres.

Response: The base map shows the rail lines in the borough and the Settlement Audit, Settlement Strategy and Settlement Profiles (particularly) all cover rail connectivity both in the borough and on the wider network.
Comment:
Not justified in light of evidence of the need to address urban sprawl to the east of Doncaster. CPRE has consistently called for the completion of a Green Belt designation around Doncaster. The need for this is evidenced by the increasing risk of coalescence of settlements east of Doncaster, principally along the A18 where Edenthorpe (ie Doncaster main urban area), Dunsville, Duncroft and Hatfield have all stretched towards each other in recent years. This in turn has made it more difficult to direct large-scale development to regeneration areas including Hungerhill (Edenthorpe) and the Unity site at Hatfield-Stainforth.

Summary:
Policy not justified - there is evidence of a need to address sprawl in eastern Doncaster. CPRE has consistently called for the Green Belt to be extended around Doncaster. Settlements principally along the A18 are at risk of merging with each other (Edenthorpe and Hatfield). This has made it more difficult to direct large-scale development to regeneration areas such as Hungerhill or Unity.

Response:
Policy not justified - there is evidence of a need to address sprawl in eastern Doncaster. CPRE has consistently called for the Green Belt to be extended around Doncaster. Settlements principally along the A18 are at risk of merging with each other (Edenthorpe and Hatfield). This has made it more difficult to direct large scale development to regeneration areas such as Hungerhill or Unity.
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<tr>
<td>Name:</td>
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<td>Organisation:</td>
<td>The Home Builders Federation</td>
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<td>28/09/2019</td>
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<td>Representing:</td>
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<td>Reason:</td>
<td>To allow for greater discussion of the industry concerns and to address any points that arise during the examination.</td>
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<td>Area:</td>
<td>Chapter 4: Strategic Approach</td>
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<td>Policy:</td>
<td>Policy 2: Spatial Strategy &amp; Settlement Hierarchy</td>
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**Tests of Soundness:**

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**Comment:**

This policy sets out the proportion of homes that will be completed in the 'Main Urban Area', 'Main Towns' and the 'Service Towns and Larger Villages'. The HBF would expect the spatial distribution of sites to follow a logical hierarchy, provide an appropriate development pattern and support sustainable development within all market areas.

**Summary:**

Policy 2 sets out the proportion of homes that will be completed in the 'Main Urban Area', 'Main Towns' and the 'Service Towns and Larger Villages'. The HBF would expect the spatial distribution of sites to follow a logical hierarchy, provide an appropriate development pattern and support sustainable development within all market areas.

**Response:**

Noted.
Draft Policy 2 sets out the Council's spatial strategy and settlement hierarchy and states that new development will be focused in and around existing urban areas (primarily the MUA, the main towns and services towns and villages. This policy continues by stating that "at least 50% of new homes will go to the 'Main Urban Area'" (Theakston Estates emphasis). Theakston Estates agrees with the approach to focus the majority of housing delivery in the MUA. However, this is a significant dilution the amount of housing which was previously directed to the MUA, and endorsed by the Inspector, in the adopted Core Strategy which is up to 64% (Table 1). The supporting text states: "The South Yorkshire sub-regional centres (e.g. Doncaster) play an important part in driving economic growth but their ability to do this is hampered by a dispersed settlement pattern and unless this issue is resolved South Yorkshire will not be able to transform its economy and environment and address the problems of social disadvantage and exclusion." (para. 3.10). "The policy seeks to distribute growth and regeneration where it would do most good in terms of supporting prosperous and sustainable communities by improving the economic performance of towns, promoting regeneration and tackling deprivation. It seeks to achieve a balance between a focus on Doncaster and sufficient growth and regeneration in the outlying towns." (para. 3.12) The Inspector’s ‘Report to Doncaster Metropolitan Borough Council’ (26 March 2012) stated in relation to the Core Strategy distribution focusing on the MUA that: "In this way, the Core Strategy seeks to change the pattern of development to ensure better access to services and especially public transport. This is a vital aspect of sustainable development." (para. 35) (Lichfields emphasis) Importantly, with regard to the Doncaster MUA, the Inspector’s Report concludes that the "assets, challenges and potential of the town require a figure at or very near the top of that range." (para. 15) (Lichfields emphasis). As such, it is clear that the Inspector considered that the housing requirement for the MUA should be around 64%. Theakston Estates submits that the proportion of development in the MUA should follow the Core Strategy (i.e. 64% of new homes within the MUA). This would alleviate pressure on less sustainable settlements and would focus new development in the most accessible locations, which, as the Inspector advised in his report, is a vital aspect of sustainable development. Increasing the number of new homes delivered in the MUA would also make a significant contribution towards driving forward the economic growth of Doncaster as an important sub-regional centre in South Yorkshire. With regard to the settlement hierarchy, Theaston Estates agrees with the recognition in draft Policy 2 that to strengthen the role and to meet the growth objectives and regeneration needs, Doncaster MUA "will be the main focus for development in the Borough, including housing, retail, leisure, cultural, office and other employment development." Furthermore, there has been a substantial shortfall of completions in the MUA over the last 4 years, with an average of 42.7% being in this area. The number of completions in the MUA compared with the total for the Borough are provided in the following table: Year - 2014/15 MUA - 308 Borough Total - 881 Year - 2015/16 MUA - 459 Borough Total - 1,025 Year - 2016/17 MUA - 555 Borough Total - 1,049 Year - 2017/18 MUA - 426 Borough Total - 1,137 MUA - 1,748 Borough Total - 4,092 Source: Doncaster’s Residential Lane Availability Reports Taking the above into account, there is an identified need to achieve a step change and allocate more homes in the MUA ahead of the requirement, or the plan will fail to achieve its objective and policy requirement to deliver a majority of new homes in this area. Proposed change: To ensure soundness, the proportion of development in the urban area should follow the Core Strategy target of 64%. Theakston Estates agrees that the majority of housing should be in the urban area, however there has been a serious dilution from the core strategy figure which was endorsed by the inspector (64% to the urban area). The inspector endorsed this as a sustainable location with good transport links and assessed that delivery would need to be near the top of this range. It is clear that the inspector considered the housing requirement for the MUA to be about 64%. The Local Plan should follow the Core Strategy and alleviate pressure on less sustainable locations and focussing development in the most sustainable locations - which the inspector advised is a key component of sustainable development. Increasing homes in the MUA would also make the most significant contribution towards driving the economic growth of Doncaster. Theakston Estates agree with the recognition in Policy 2 that the MUA will be the main focus for development in the borough. Furthermore, there has been a substantial shortfall of completions in the MUA over the last 4 years, with an average of 42.7% being in this area. The number of completions in the MUA compared with the total for the Borough are provided in the following table (Source: RLA): Year - 2014/15 MUA - 308 Borough Total - 881 Year - 2015/16 MUA - 459 Borough Total - 1,025 Year - 2016/17 MUA - 555 Borough Total - 1,049 Year - 2017/18 MUA - 426 Borough Total - 1,137 MUA - 1,748 Borough Total - 4,092 Taking this into account, there is an identified need to achieve a step change and allocate more houses in the MUA ahead of the requirement, or the plan will fail to achieve its objective and policy requirement to deliver a majority of new homes in this area. Proposed change: To ensure soundness, the proportion of development in the urban area should follow the Core Strategy target of 64%. Theakston Estates agrees that the majority of housing should be in the urban area, however there has been a serious dilution from the core strategy figure which was endorsed by the inspector (64% to the urban area). The inspector endorsed this as a sustainable location with good transport links and assessed that delivery would need to be near the top of this range. It is clear that the inspector considered the housing requirement for the MUA to be about 64%. The Local Plan should follow the Core Strategy and alleviate pressure on less sustainable locations and focussing development in the most sustainable locations - which the inspector advised is a key component of sustainable development. Increasing homes in the MUA would also make the most significant contribution towards driving the economic growth of Doncaster. Theakston Estates agree with the recognition in Policy 2 that the MUA will be the main focus for development in the borough. Furthermore, there has been a substantial shortfall of completions in the MUA over the last 4 years, with an average of 42.7% being in this area. The number of completions in the MUA compared with the total for the Borough are provided in the following table (Source: RLA): Year - 2014/15 MUA - 308 Borough Total - 881 Year - 2015/16 MUA - 459 Borough Total - 1,025 Year - 2016/17 MUA - 555 Borough Total - 1,049 Year - 2017/18 MUA - 426 Borough Total - 1,137 MUA - 1,748 Borough Total - 4,092 Taking this into account, there is an identified need to achieve a step change and allocate more houses in the MUA ahead of the requirement, or the plan will fail to achieve its objective and policy requirement to deliver a majority of new homes in this area. Proposed change: To ensure soundness, the proportion of development in the urban area should follow the Core Strategy target of 64%.
The Local Plan replaces the Core Strategy and has consulted on a new approach to the spatial strategy and distribution, as per the Housing Topic Paper. The Main focus for growth is still the Main Urban Area but other sustainable locations will get some housing based on their existing households and service provision. 50% Main Urban Area growth does not put undue pressure on smaller locations, rather provides the opportunities for local needs to be met locally. The plan is allocating 7,211 units in the Main Urban Area (18 - 33), which is 54.5% of the overall 15 year allocated requirement for this period. This location is therefore delivering the majority of new homes here, as set out in the strategy. Many means of calculating housing need and distributing housing have been put forward, but the Council's preferred strategy achieves the preferred spread and distribution, informed by Peter Brett's assessment of housing need.
4.1. Strata Homes is concerned that the Doncaster Local Plan 2015-2035 Publication Version is deficient in its content and evidence base and does not reflect national guidance. Test of Soundness 4.2. Strata Homes considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 4.3. Strata Homes is concerned with the Spatial Strategy and distribution. Strata Homes would expect the spatial strategy and distribution to provide an appropriate development pattern and support economic growth and sustainable development within all market areas. 4.4. The Strategy at present focuses growth towards Doncaster, followed by the Main Towns and then a smaller element in the Service Towns and Larger Villages and then no development in other defined villages. Therefore no new housing is proposed in the rural economy in settlements which are relatively sustainable. This approach is broadly consistent with the strategy set out in the UDP and subsequent Core Strategy. Strata Homes are concerned that this risks focusing development in less viable areas and risks under delivery 4.5. The implementation of the Spatial Strategy will be discussed in response to Policy 6 and the proposed allocations. 4.6. Doncaster is an integral part of the Sheffield City Region and the ambitious growth aspirations. The Strategic Economic Plan sets out the Sheffield City Region's plans to transform the local economy over the next decade. At the heart of the plan is the creation of 70,000 new private sector jobs and 6,000 new businesses. 4.7. Therefore, to achieve the aspirered growth that the City Region is seeking to achieve and is securing Government funding for the level of new housing needs to reflect the ambitions of the Strategic Economic Plan. 4.8. Furthermore, the Sheffield City Region Integrated Infrastructure Plan states: A quality housing offer has a crucial role to play in the future economic growth of the City Region. It is essential to attracting and retaining a skills base that supports inward investment as we as meeting existing and future community needs and retention of Sheffield City Region (SCR) talent. It has been identified that between 70,000 and 100,000 additional homes are needed in SCR to support the proposed economic growth over the next 10 years. These will have the dual benefit of providing accommodation that underpins the proposed increase in employment (70,000 jobs), as well as the wider economic benefits that housing investment brings. Housing forms a key component of the SCR construction sector. The CBI [CBI [2012] Bridging the Gap - Backing the Construction Sector to Create Jobs] estimates that every #1 spent on construction projects yields a total of #2.84 expenditure in the wider economy. It is estimated that approximately #2,000 per annum per household spending on local convenience goods, and approximately #2,700 per annum per household spending on local comparison goods can be attributed to residents in new housing. (Over the lifetime of the SEP, a similar amount would generate at least #400 million for the SCR economy). The GVA benefits that can be attributable to new housing are as follows: - Construction: material, labour professional skills and other services for construction, compounded by supply chain benefits - Household Maintenance Spend: Spend on products and services associated with each new household - Direct Job Uptake: GVA resulting from new productive workers moving into SCR, compounded by their spend on SCR products and services - Indirect (Chain) Benefits: As SCR residents move up the housing chain, this creates new available space in different sub-markets. - Preventing Displacement: The type and location of construction may be important in mitigating losses of households from the city region that might otherwise occur. 4.9. Within this context it is important that the Council plans for new jobs and associated new homes in accordance with the Strategic Economic Plan growth aspirations. 4.10. To achieve this approach, Strata Homes consider the Local Plan should: - Focus the majority of development upon Doncaster Main Urban Area but review the likely housing yield from existing sites with planning permission and proposed allocations to ensure that they can all be delivered within the Plan Period. This is explained further in response to Policy 3. - To focus growth and regeneration on the Main Towns of appropriate scale for their needs and the economic growth aspirations of the Borough. Rossington should be an area of growth given the provision of new infrastructure, its location near to Doncaster Airport, and the scale of economic growth planned at iPort. Thorne and Moorsend should grow to reflect its location, regeneration ambitions connected with the logistics and employment parks, and level of facilities available within the designated town and local centres. Within that context Carcroft and Skellow is of similar scale to the Main Towns and should be identified as such, particularly with its provision of employment parks and location on the A1(M) and focus on regeneration and growth. - Provision should be made in the Service Towns and Larger Villages to reflect their scale and function. These are sustainable towns and villages which serve a hinterland. Wadworth is of a similar scale and function of these settlements and should therefore be defined as such, recognising its proximity and connectivity to the Main Urban Area. - Defined Villages are sustainable villages serving a rural economy and should accommodate a level of development appropriate to their scale and function in line with the provisions Framework (paragraph 78). 4.11. Strata Homes consider that the above approach meets the Local Plan vision and objectives identified within the Local Plan but is also one that is more aligned with the principles of sustainable development. 4.12. Policy 2 establishes the strategic approach to the Green Belt within Doncaster and states that the general extent of the Green Belt will be retained. Strata Homes is concerned that Green Belt boundaries have been drawn tightly around settlements and proposed allocations and as such does not have regard to the intended permanence in the long term so that the boundaries can endure beyond the Plan period. Policy 3 and 6 do not identify any safeguarded land. The Plan does identify reserve sites. However these sites have significant technical constraints. Strata Homes do not consider that they are suitable pool of sites due to the significant constraints and object to their identification in the Plan. 4.13. Whilst there is no definitive guidance indicating the amount of land which should be safeguarded the Framework (2019) is clear that where necessary Local Plans should 'identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period', and that local authorities should 'be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period'. Given that the council
The Local Plan's Spatial Strategy and distribution does not provide an appropriate development pattern that supports economic growth and sustainable development within all market areas. The Strategy focuses growth towards Doncaster, followed by the Main Towns and then a smaller element in the Service Towns and Larger Villages and then no development in other defined villages. No new housing is proposed in the rural economy in settlements which are relatively sustainable. This approach is broadly consistent with the strategy set out in the UDP and subsequent Core Strategy. Strata Homes are concerned that this risks focusing development in less viable areas and risks under delivery Doncaster is an integral part of the Sheffield City Region and an appropriate level of new housing is needed to meet the ambitious growth aspirations of the Strategic Economic Plan. To achieve the growth needed the Local Plan should: - Focus the majority of development upon Doncaster Main Urban Area but review the likely housing yield from existing sites with planning permission and proposed allocations to ensure that they can all be delivered within the Plan Period. - Focus growth and regeneration on the Main Towns of appropriate scale for their needs and the economic growth aspirations of the Borough. Rossington should be an area of growth given the provision of new infrastructure, its location near to Doncaster Airport, and the scale of economic growth planned at iPort. Thorne and Moorends should grow to reflect its location, regeneration ambitions connected with the logistics and employment parks, and level of facilities available within the designated town and local centres. Within that context Carcroft and Skellow is of similar scale to the Main Towns and should be identified as such, particularly with its provision of employment parks and location on the A1(M) and focus on regeneration and growth. - Make provision in the Service Towns and Larger Villages to reflect their scale and function. These are sustainable towns and villages which serve a hinterland. Wadworth is of a similar scale and function of these settlements and should therefore be defined as such, recognising its proximity and connectivity to the Main Urban Area. - Defined Villages are sustainable villages serving a rural economy and should accommodate a level of development appropriate to their scale and function in line with the provisions Framework (paragraph 78). Policy 2 establishes the strategic approach to the Green Belt within Doncaster and states that the general extent of the Green Belt will be retained. Strata Homes is concerned that Green Belt boundaries have been drawn tightly around settlements and proposed allocations and as such does not have regard to the intended permanence in the long term so that the boundaries can endure beyond the Plan period. Policy 3 and 6 do not identify any safeguarded land. The Plan does identify reserve sites. However these sites have significant technical constraints. Strata Homes do not consider that they are suitable pool of sites due to the significant constraints and object to their identification in the Plan. Given that the council considers that the majority of sites will be delivered within the plan period it is highly likely that further alterations to the green belt will be required at the next review of the Plan and safeguarded land should be identified across the spatial hierarchy, including smaller settlements per the earlier spatial approach. Strata Homes consider that with the proposed changes to the strategy and establishing the approach to safeguarding land the Local Plan can be found sound. To overcome the objection and address soundness matters, the Council should: - Reflect economic and housing growth aspirations - Amend the Spatial Strategy as indicated - Identify safeguarded land or suitable Reserve Development Sites across the spatial hierarchy.

The approach to the distribution of housing is explained in the Housing Topic Paper. The approach allocates housing to the most sustainable locations, including economic growth to the more sustainable Main Urban Area and Main Towns, but does provide opportunities for some limited development in smaller localities to support these rural areas as set out in Policy 2 & 3. The approach to Green Belt, including the decision not to safeguard land, is discussed in the Green Belt Topic Paper. NPPF states boundaries should be clearly defined and not include land which is unnecessary to keep permanently open and that boundaries should be drawn using readily recognisable features. Reserve development sites are sites which do not count towards any housing calculations, but are sites where housing could be located if the technical constraints can be overcome.
Comment Ref: /Policy 2 - Site 315/0234/2/002

Attend Examination: Attend Hearing

Reason: To support the Representations Report and the Inspector’s understanding of the site.

Area: Chapter 4: Strategic Approach

Policy: Policy 2: Spatial Strategy & Settlement Hierarchy

Tests of Soundness: Justified

Policy 2 of the Publication Local Plan identifies Finningley as a Level 3 settlement 'Service Town & Village'. Additional growth on non-allocated sites in appropriate locations within the development limits of Services Towns and Villages. The policy goes on to state that in regards to the Countryside is defined as that outside of the Green Belt and beyond the defined settlement limits. Residential development will also be supported in the Countryside if adjacent to a Development Limit of a settlement in levels 1-3 where: a) It is consistent with the role and service function of the settlement in the settlement hierarchy set out above; b) The site is well related to the existing built form of the settlement and would represent a logical extension to the built up area or is of a scale and nature that is in keeping with the core shape, form and size of the settlement; c) It will not cause significant adverse harm to settlement’s character, setting and appearance (including partial or total coalescence with another settlement) or to the intrinsic character of the surrounding countryside; d) It accords with other policies in the Local Plan; and e) A five year borough wide of housing land cannot be demonstrated and the development would make a significant positive contribution to housing land supply. The site off Station Road is proposed to be located within Countryside Policy Area and it is considered that the development limit for Finningley should be amended to encompass the site. We therefore object to the current proposed designation of the site within the Countryside Policy Area. Recommendation The development limit of Finningley is amended to incorporate the site. Justification The site is suitable, deliverable, developable, and is capable of being brought forward and will make best use of previously developed land. The site is also located in a sustainable location within close proximity to services and amenities in Finningley, the development of this site represents a sustainable form of development. Moreover, the site has been assessed within the 2018 HELAA Report under site reference 315 'Land west of Station Road' and acknowledges that the site is suitable, available and deliverable within 5 years and the capacity to deliver 31 dwellings.

Summary:

Object to the site being located in the Countryside. The development limit for Finningley should be extended to incorporate this site. It is suitable, deliverable and developable, is capable of being brought forward and makes the best use of previously developed land. It is in a sustainable location and close to services and amenities in Finningley. The HELAA acknowledges the site is suitable, available and deliverable within 5 years and can deliver 31 dwellings.

Response:

Finningley is defined as a "Service Town and Village" in the settlement hierarchy of Policy 2. The site is greenfield and countryside and would form an extension to the settlement. Given Finningley can meet most of its housing target via permissions (being just 5 short of its target of 55), it is not considered that such an extension into the countryside is necessary, nor can it be justified.
1. Doncaster’s Draft Local Plan reiterates the proposals in the Draft Sites and Policies of the Local Plan (autumn of 2018) and disregards the objection made by the Parish Council, the Neighbourhood Plan Group and others. 2. The Draft Plan proposes an allocation of 80 new homes on: “A single greenfield urban extension, on land formerly designated as Green Belt, to the north of Cadby Road and to the west of the village.” 3. The Parish Council’s original submission was: (i) “The Parish endorse the views of the Sprotbrough Neighbourhood Planning Group (Sprotbrough Champions) and the views of Sprotbrough residents expressed in the questionnaire circulated to residents, that there should be no development in the green belt surrounding Sprotbrough. The Parish Council believe that no case has been made by DMBC for exceptional circumstances that would justify approval for residential development within the green belt areas around Sprotbrough and that these amenity areas should be preserved. (ii) The Parish Council asks DMBC to justify their decision to split Sprotbrough into two parts when designating areas within the proposed Local Plan. Currently one part of Sprotbrough is in the urban area and the other part is not and is classified under the heading of Sprotbrough (village). The Parish Council believes that this separation does not take any account of the approved Neighbourhood Plan area or the remit of the Parish Council who serve the whole of Sprotbrough.” 4. The Parish Council’s objection in 3(i) & our reasons for objecting have not been incorporated into the Plan. The Parish Council still consider that DMBC Planners have not clarified or explained the reasoning for their decision to divide Sprotbrough into two areas, east and west of the A1(M) and designate that to the west "Sprotbrough Village". At a Parish Council meeting in January 2019 DMBC Planning Officers stated that this division of Sprotbrough for planning purposes was not new. However the decision to separate Sprotbrough for housing allocation purposes is in the Parish Councils view an unjustified decision with no consideration of or reference to the points raised by the Parish Council in opposition to this decision. 5. The Draft Local Plan fails to address this crucial issue. Yet this decision to divide Sprotbrough into two areas for planning purposes is fundamental to the issue of encroachment into the Green Belt. The whole of Sprotbrough is one community and is all within the Sprotbrough & Cusworth Parish boundary. It is one entity and it is vitally important for community harmony that the whole of Sprotbrough is treated equally. From the Parish Council perspective it would appear that DMBC have drawn an arbitrary line on Melton Road at the A1(M). 6. The draft Neighbourhood Development Plan area covers the whole of Sprotbrough and has been approved by DMBC. There has been a great deal of consultation with DMBC Planners on the Neighbourhood Plan and no suggestion was made that Sprotbrough should be divided into two areas. 7. The reason this issue is crucial is because if Sprotbrough is not divided into two areas, the justification for encroachment into the Green Belt surrounding Sprotbrough would seem to disappear. 8. The National Planning Policy Framework (NPPF) makes it very clear that development into the Green Belt should only be permitted in exceptional circumstances. The Parish Council consider that exceptional circumstances do not exist here.

Summary:
Sprotbrough Parish Council objects any development in the Green Belt surrounding Sprotbrough, and in particular the proposed allocation of a site for 80 new homes in current Green Belt. The Council also object to the division of Sprotbrough Parish and its Neighbourhood Plan area into two areas for Local Plan purposes. If Sprotbrough is not divided into two areas, the justification for encroachment into the Green Belt would seem to disappear.

Response:
The current development plan (and indeed emerging local plan) has always differentiated between the village of Sprotbrough to the west of the A1(M) as a separate settlement to that to the east of the A1(M) which forms part of the Doncaster Main Urban Area. The 2 settlements are separated by Green Belt. As the representation notes, the only thing that has changed is that a larger range of the Villages in Doncaster are now being proposed for an allocation compared to the current Development Plan; this was subject to early consultation through the Issues & Options & Homes & Settlements stages. Disagree that were the 2 to be treated as a single settlement there would be no sites proposed in the Green Belt as Sprotbrough 'Village' would become part of the Doncaster Main Urban Area which is the main focus for housing growth and Green Belt allocations are being proposed at the Main Urban Area too. Sprotbrough 'Village' sites would have been assessed alongside all the other Main Urban Area Green Belt site options and the conclusion likely to have been the same based on the site selection methodology. Exceptional circumstances are set out in the Green Belt Topic paper and NPPF is clear that Green Belt boundaries can be changed through the preparation (or review) of a local plan.
23. The Parish Council consider that there are no "exceptional circumstances" or "very special circumstances" justifying development into the Green Belt. The proposal is not the result of an assessed need in that part of Sprotbrough but is solely the result of an allocation of housing to an area of its "share" of Doncaster's total housing need, which would inevitably result in encroachment into the Green Belt. 24. The Parish Council believe that even if there were exceptional circumstances, site 788 would be the obvious choice for housing. 25. Therefore it is the Parish Council's belief that the Draft Local Plan does not meet the "test of soundness" in respect of its housing proposals for Sprotbrough.

Summary:
There are no exceptional circumstances justifying development in the Green Belt, and even if there were, Site 788 would be the obvious choice for housing.

Response:
Conclusion type comments, detailed points will be picked up through other parts of this document, no response required.
Policy 2 sets out the housing strategy, specifically providing details regarding the spatial approach to the delivery of housing across the Borough. The largest proportion of the annual requirement (50%) goes to the ‘Main Urban Area’ of Doncaster. The ‘Main Towns’ of Adwick - Woodlands, Armthorpe; Conisborough & Denaby; Dunsford, Dunslooe, Hatfield & Stainforth; Mexborough; Rossington; and Thorne & Moorends are collectively attributed 40% of the growth target. Approximately 10% of the growth is to be met in the ‘Service Towns and Villages’. Whilst we support the intention for the bulk of development to focus on the large settlements in the Borough and in particular Doncaster, Gladman suggest that through the Local Plan, there is an opportunity to improve the sustainability of a wide range of settlements by allocating a meaningful amount of land for development of housing and associated services, particularly in sustainable settlements outside the Green Belt such as Finningley. In allocating sites, the Council should be mindful that to give itself a suitable baseline on which to maintain housing land supply, the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets across a wide range of local markets. The maximum delivery is achieved not just because there are more sales outlets, but because the widest possible range of products and locations are available to meet the widest possible range of demand. Paragraph 78 of the Framework (2019) seeks to promote sustainable development in rural areas to maintain and enhance rural vitality and viability. It is essential therefore, that the needs of the rural settlements across the Borough are assessed and a meaningful level of growth apportioned to them to ensure their ongoing sustainability, vitality and viability. This will help to preserve and enhance rural services and facilities and allow local rural communities to meet their own needs for housing whilst providing much needed affordable housing in the parts of the Borough that suffer with the greatest affordable housing need. It is important to consider existing services and facilities in a settlement when assessing their suitability for accommodating new development. Daily needs are particularly important with a primary school, shop and access to public transport being the key considerations. It must be recognised that there may be an ability, through new development, to improve some of these services and facilities, particularly access to public transport, that should be considered in any settlement hierarchy exercise as well as the role that new development can play in ensuring these facilities are maintained and are not lost because of a lack of support. Gladman consider it essential that the Council recognises that the Main Urban Area of Doncaster is constrained by Green Belt, flooding and in part by the M18 and A1(M) Motorways and numerous railways. In line with this, we suggest that sufficient flexibility is established in this and any related policy to ensure delivery of the identified overall housing target set out in Policy 3, is not compromised by a stringent adherence to the settlement hierarchy and defined distribution of growth. Therefore, we recommend, that if the Council intend to push ahead with the spatial distribution set out in this consultation, the wording of the policy is amended to read ‘approximately 50% of new housing’ instead of ‘at least 50% of new housing’. Gladman object to the use of the chosen approach to draw tight development limits around sustainable settlements where this provides no flexibility in line with the presumption in favour of sustainable development. It leads to an approach whereby countryside policies are brought forward that are more akin to the outdated national policy approach to protect the countryside for its own sake. Local policies should recognise that sustainable development opportunities exist beyond the built limits of sustainable settlements that are located outside of the Green Belt and that such proposals have the ability to be brought forward for development when the need arises in a manner that respects the intrinsic character and beauty of the countryside that is advocated by the NPPF (2019).

Summary:

Whilst support is given to the intention for the bulk of development to focus on the large settlements in the Borough, and in particular Doncaster, Gladman suggest that there is an opportunity to improve the sustainability of a wide range of settlements by allocating a meaningful amount of land for development of housing and associated services, particularly in sustainable settlements outside the Green Belt, such as Finningley. In allocating sites, the Council should be mindful that to give itself a suitable baseline on which to maintain housing land supply, the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets across a wide range of local markets. The maximum delivery is achieved not just because there are more sales outlets, but because the widest possible range of products and locations are available to meet the widest possible range of demand. Paragraph 78 of the Framework (2019) seeks to promote sustainable development in rural areas to maintain and enhance rural vitality and viability. It is essential therefore, that the needs of the rural settlements across the Borough are assessed and a meaningful level of growth apportioned to them to ensure their ongoing sustainability, vitality and viability. This will help to preserve and enhance rural services and facilities and allow local rural communities to meet their own needs for housing whilst providing much needed affordable housing in the parts of the Borough that suffer with the greatest affordable housing need. It is important to consider existing services and facilities in a settlement when assessing their suitability for accommodating new development. Daily needs are particularly important with a primary school, shop and access to public transport being the key considerations. It must be recognised that there may be an ability, through new development, to improve some of these services and facilities, particularly access to public transport, that should be considered in any settlement hierarchy exercise as well as the role that new development can play in ensuring these facilities are maintained and are not lost because of a lack of support. The Council should recognise that the Main Urban Area of Doncaster is constrained by Green Belt.
flooding and in part by the M18 and A1(M) Motorways and numerous railways. It is therefore suggested that sufficient flexibility is established in this and any related policy to ensure delivery of the identified overall housing target set out in Policy 3 is not compromised by a stringent adherence to the settlement hierarchy and defined distribution of growth. If the Council intend to proceed with the spatial distribution set out in this consultation, the wording of the policy should be amended to read ‘approximately 50% of new housing’ instead of ‘at least 50% of new housing’. Gladman object to the use of drawing tight development limits around sustainable settlements where this provides no flexibility in line with the presumption in favour of sustainable development. It leads to an approach whereby countryside policies are brought forward that are more akin to the outdated national policy approach to protect the countryside for its own sake. Local policies should recognise that sustainable development opportunities exist beyond the built limits of sustainable settlements that are located outside of the Green Belt and that such proposals have the ability to be brought forward for development when the need arises in a manner that respects the intrinsic character and beauty of the countryside that is advocated by the NPPF (2019).

Response:
The Local Plan proposes an appropriate strategy that steers development to the most sustainable locations taking into account Green Belt and existing countryside designations. Policy 2 introduces flexibility for permitting additional growth subject to meeting its conditional criteria. Development have been identified (according to a methodology that has been consulted upon) - to allow the identification of rational and robust boundaries which for the application of "Countryside" policy and identification of settlement boundaries within which development is prioritised. This supports the plan led approach to development.

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<td>Comment:</td>
<td>3.1 Policy 2 firstly states: &quot;New development (including homes, supporting services and associated jobs) will be focussed in and around existing urban areas (primarily Doncaster's 'Main Urban Area', its 7 'Main Towns' and 10 'Service Towns and Villages').&quot; 3.2 It is of note that Conisbrough (&quot;Conisbrough and Denaby&quot;) is designated as a Main Town in Policy 2. It is considered that this is an appropriate designation. 3.3 Policy 2 also states that: &quot;At least 50% of new homes will go to the 'Main Urban Area', approximately 40% to the 'Main Towns' and about 10% to the 'Service Towns and Villages'.&quot; 3.4 The delivery of the site at Sheffield Road, Conisbrough will support this policy objective.</td>
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<td>Summary:</td>
<td>The designation of Conisbrough Denaby as a Main Town is correct. The delivery of Site 040 will support the proposed 40% of housing in the Main Towns.</td>
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<td>Response:</td>
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Policy 2 firstly states: "New development (including homes, supporting services and associated jobs) will be focussed in and around existing urban areas (primarily Doncaster’s 'Main Urban Area', its 7 ‘Main Towns’ and 10 ‘Service Towns and Villages’).” 2.2 It is of note that Highfields is designated as a Defined Village in Policy 2. 2.3 Policy 2 also states that: “At least 50% of new homes will go to the ‘Main Urban Area’, approximately 40% to the ‘Main Towns’ and about 10% to the ‘Service Towns and Villages’.” Object to none going to the defined villages such as Highfields. 2.4 Further to the above, Policy 2 states that: “Housing allocations and mixed-use allocations to accommodate economic-led housing growth are directed to the most sustainable and deliverable urban and urban extension sites in the Main Urban Area and Main Towns in accordance with the growth ranges set out in Policy 3 and in accordance with a sequential approach to flood risk.” 2.5 We object to failure of the plan to allocate any housing or employment growth to the defined villages. 2.6 In particular the approach fails to recognise the individual attributes of certain potential locations such as Brodsworth Quarry. This is a substantial area of land which is not capable of productive use in terms of agriculture and yet, unlike other locations in Doncaster, is not subject to flood risk. In addition, while described as being adjacent to Highfields it is also immediately south of Adwick le Street. 2.7 The despoiled nature of the land itself coupled with its general location and overall size, means that its redevelopment for a mixed use scheme could provide significant environmental, social and economic benefits. These benefits would not only be for the immediate residents of Highfields in terms of improvement to access of facilities and employment but also to the wider area, especially as it would reduce the amount of agricultural land that will be released for development and reduce the number of dwellings that will be in areas at risk of flooding. 2.8 The sustainability character of the site is set out in full in section 3 of this report. Recommendation 2.9 The Council should identify the Brodsworth Quarry site as a specific location to accommodate further housing and employment growth in Policy 2 as part of the overall strategy. 2.10 It is further recommended that the site is specifically identified for Green Belt release in part 6) of the policy. Justification 2.11 The site is located in a sustainable location which is suitable for housing and employment growth. Also, given the size of the site and its potential capacity, the site provides an opportunity to create an urban extension to Highfields and deliver significant economic and housing growth.

Summary:

Policy 2 states that new development will be focussed in and around existing urban areas and that 50% of new homes will go to the Main Urban Area, 40% to the Main Towns and about 10% to Service Towns. Highfields is a Defined Village. Objection to no houses going to defied villages. Policy 2 also states that housing and mixed use allocations to accommodate economic-led housing growth are directed to the most sustainable deliverable urban and urban extension site in the Main Urban Area and Main Towns. We object to the failure of the plan to allocate any housing and employment growth to the defined villages. The approach fails to recognise the attributes of certain locations such as Brodsworth Quarry. This is an area of land which is not capable of productive use and is not subject to flood risk. It is immediately south of Adwick le Street. The redevelopment for a mixed use scheme could provide significant environmental, social and economic benefits. These benefits would be for the residents of Highfields (access to facilities and employment) and also the wider area - it would reduce the amount of agricultural land that will be released for development and reduce the number of dwellings that will be in areas at risk of flooding. The Council should identify the Brodsworth Quarry site as a specific location to accommodate further housing and employment growth in Policy 2 as part of the overall strategy. It should also be identified for Green Belt release in part 6) of the policy.

Response:

Policy 2 does not prevent development in Defined Villages but in line with their relative low sustainability, which justifies the lack of allocations, allows for development subject to other policies in the Plan. Development proposals in the Green Belt will be considered against national Green Belt policy in the NPPF.
We act for a number of major land owners in the Doncaster area, we have detailed knowledge of the sites and the planning history of the Borough. We have previously been involved with the Core Strategy Plan and with the Examination of the draft Sites and Policies DPD. Our knowledge of the various land parcels, ownerships, the strategic land position and site specific details, means that we have information to inform the debate regarding the overall housing requirement and the specific allocation of sites which will assist the examination.

We object to the policy as drafted on the basis that the text indicates that the split of new development will be 50% of new homes to Doncaster urban, 40% to main towns and 10% to the service towns and villages. Of these proportions only local needs housing is distributed on a pro rata basis, and the economic led housing growth is distributed only to Doncaster Urban and the Main towns. None of this part of the housing growth is allocated to the service towns and villages and there is no cogent explanation of why these sustainable settlements should not have a proportionate share of this part of the proposed housing growth. The strategy as drafted in this Policy therefore does not reflect the sustainability and potential of the service towns and villages to meet a share of the economic led housing growth. Part 3 of the Policy sets out the role of the service towns and villages, and indicates that these settlements will be a focus for a level of growth to meet their “local needs” as well as regenerating run down areas. There is no explanation of what is meant by local needs in this part of the policy, but it can only be assumed that this is the local needs housing element of the overall requirement minus the economic growth housing. This is a false distinction in terms of land allocation in these settlements which should receive a proportionate share of economic growth housing as set out above. Within these service towns and villages, growth within the development boundaries is considered favourably. The Policy also makes provision for other new development on sites adjacent/ outside the development boundary in certain circumstances; which include the situation where the Planning Authority cannot demonstrate a five year land supply. The Plan does not identify any locations where this could take place and does not make clear what the role of the other reserve sites are in this context. It is not considered that the current reserved sites represent the best options for future land release. PROPOSED CHANGE 1. To include the proposed allocations 186 and 165 within the development limit of Carcroft/ Skellow. As explained in detail above.

Objection is made to the policy as drafted on the basis that the text indicates that the split of new development will be 50% of new homes to Doncaster urban, 40% to main towns and 10% to the service towns and villages. Of these proportions only local needs housing is distributed on a pro rata basis, and the economic led housing growth is distributed only to Doncaster Urban and the Main towns. None of this part of the housing growth is allocated to the service towns and villages and there is no cogent explanation of why these sustainable settlements should not have a proportionate share of this part of the proposed housing growth. The strategy as drafted in this Policy therefore does not reflect the sustainability and potential of the service towns and villages to meet a share of the economic led housing growth. Part 3 of the Policy sets out the role of the service towns and villages, and indicates that these settlements will be a focus for a level of growth to meet their “local needs” as well as regenerating run down areas. There is no explanation of what is meant by local needs in this part of the policy, but it can only be assumed that this is the local needs housing element of the overall requirement minus the economic growth housing. This is a false distinction in terms of land allocation in these settlements which should receive a proportionate share of economic growth housing as set out above. Within these service towns and villages, growth within the development boundaries is considered favourably. The Policy also makes provision for other new development on sites adjacent/outside the development boundary in certain circumstances; which include the situation where the Planning Authority cannot demonstrate a five year land supply. The Plan does not identify any locations where this could take place and does not make clear what the role of the other reserve sites are in this context. It is not considered that the current reserved sites represent the best options for future land release. PROPOSED CHANGE 1. To include the proposed allocations 186 and 165 within the development limit of Carcroft/ Skellow. As explained in detail above.

Objects to policy and distribution of development with only local needs being directed to Service Towns/Villages; these are sustainable settlements so should also receive a share of the economic growth-led housing and there is no explanation for this. The strategy does not reflect the sustainability potential of these settlements therefore. The policy allows development adjacent/outside of settlement limits in certain circumstances but does not identify any locations where this could take place and does not make clear what the role of reserve sites are in this context. It is not considered the current reserve sites are the best options for future land release. Development limits should be drawn to include housing allocation at Carcroft-Skelloy (Ref 186/165).

The strong messages that came out of the Issues & Options stage and Homes & Settlements consultation was support for meeting local housing needs locally which has resulted in a more dispersed settlement hierarchy, which introduces a greater number of settlements suitable for allocations (larger service villages) compared to the Core Strategy in the first instance. However, the economic-growth led housing component is more footloose and has been directed to the higher tier settlements which reflects their stronger sustainability credentials. The approach has also allowed a sequential approach to avoidance of flood risk at spatial strategy level so that the strategy (and then subsequent sites) have both been identified in line with national policy’s requirement to avoid flood risk where possible. Approaches to more dispersal/greater concentration/current Core Strategy approach etc. were all options that were considered and subject to SA. A Settlement Background Paper was published alongside the Publication Plan (and previous 2018 consultation) setting out more details and will be updated and republished as a Topic Paper for Submission. Part 5 of the policy provides flexibility to bring forward additional development outside of allocations in the east of the borough and is a criteria based policy that could be used at any of the settlements with Countryside (but not Green Belt) boundaries. Reserve Sites are the subject of Policy 6 (and identified in Chapter 16 and on the Policies Map) and are a separate source of potential housing supply unrelated to Part 5 of this policy and are not necessary in terms of meeting the housing requirement.
Comment Ref: C/Policy 2/03431/1/002

Attend Examination: Attend Hearing

Reason: We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Area: Chapter 4: Strategic Approach

Policy: Policy 2: Spatial Strategy & Settlement Hierarchy

Tests of Soundness:

Consistent with national

Comment:

The removal of safeguarded land within this policy is not supported by Persimmon Homes. While there is no definitive guidance indicating the amount of land which should be safeguarded, the National Planning Policy Framework (NPPF) (2019) is clear that where necessary Local Plans should 'identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period', and that local authorities should 'be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period'. The evidence base document entitled Green Belt Topic Paper (2019) produced by Doncaster Metropolitan Borough Council (the Council) provides some explanatory text to support the exclusion of safeguarded land from the Local Plan. It does not, however, provide sufficient evidence that Green Belt boundaries will not need to be altered at the end of the Plan period. This policy is therefore not compliant with the NPPF and is not justified, because it has not been demonstrated that the plan will provide a robust long-term Green Belt boundary nor certainty for residents and developers alike in terms of likely growth locations beyond the end of the plan period. The defined development limits outlined in this policy are also overly restrictive and unsound. Placing a blanket ban on residential development outside defined settlements apart from in exceptional circumstances or for rural exceptions is not consistent with national policy, which outlines that plans should be prepared with the objective of contributing to the achievement of sustainable development. Much of the land adjacent to the defined development limits is in sustainable locations which could contribute to meeting the housing need and provide sustainable development. The restriction imposed by such a policy may prevent the area from meeting its housing need. Proposals for development in these locations should not be required to demonstrate exceptional circumstances or clear local support in order to achieve support from the Council.

Summary:

Objects to the lack of safeguarded land between urban area and Green Belt. The Green Belt Topic Paper (2019) provides some justification but does not provide sufficient evidence that Green Belt boundaries will not need to be altered at the end of the Plan period. The defined development limits outlined in this policy are also overly restrictive and unsound. Placing a blanket ban on residential development outside defined settlements apart from in exceptional circumstances or for rural exceptions is not consistent with national policy, which outlines that plans should be prepared with the objective of contributing to the achievement of sustainable development. Much of the land adjacent to the defined development limits is in sustainable locations which could contribute to meeting the housing need and provide sustainable development. The restriction imposed by such a policy may prevent the area from meeting its housing need. Proposals for development in these locations should not be required to demonstrate exceptional circumstances or clear local support in order to achieve support from the Council.

Response:

The Local Plan does not propose to identify Safeguarded Land in the Green Belt for the reasons given in the Green Belt Topic Paper.
We act for a number of major land owners in the Doncaster area, we have detailed knowledge of the sites and the planning history of the Borough. We have previously been involved with the Core Strategy Plan and with the Examination of the draft Sites and Policies DPD. Our knowledge of the various land parcels, ownerships, the strategic land position and site specific details, means that we have information to inform the debate regarding the overall housing requirement and the specific allocation of sites which will assist the examination.

The Development Limits methodology was subject to previous consultation (2018) and re-published alongside the Publication version for the plan. It has always proposed that greenfield urban extension allocations should be excluded from development limits, but would be incorporated when the permission/development has been implemented through a future review of the plan. This is a logical approach, especially so for larger allocations where development will include not just housing but other non-urban uses which may still remain outside of development limits depending on final layouts e.g. landscaping, public open space, balancing ponds etc.

Object is made to this Policy  The Doncaster main urban area is defined on the Proposals Map. The development limits shown on the map exclude the proposed allocation from the urban area. The allocation of the site as an extension of the urban area means that it is necessarily part of the Doncaster urban area. The Plan should be changed to reflect this, together with the text in Policy 2 at part 1, which defines the extent of the Doncaster Urban Area.  PROPOSED CHANGE  1. To include the proposed allocations 164 and 430 within the development limit of Doncaster Urban Area. As explained in detail above.
4.1. H. Burtwistle & Son is concerned that the Doncaster Local Plan 2015-2035 Publication Version is deficient in its content and evidence base and does not reflect national guidance. Test of Soundness 4.2. H. Burtwistle & Son considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 4.3. H. Burtwistle & Son is concerned with the Spatial Strategy and distribution. H. Burtwistle & Son would expect the spatial strategy and distribution to provide an appropriate development pattern and support economic growth and sustainable development within all market areas. 4.4. The Strategy at present focuses growth towards Doncaster, followed by the Main Towns and then a smaller element in the Service Towns and Larger Villages and then no development in other defined villages. Therefore no new housing is proposed in the rural economy in settlements which are relatively sustainable. This approach is broadly consistent with the strategy set out in the UDP and subsequent Core Strategy. H. Burtwistle & Son are concerned that this risks focusing development in less viable areas and risks undermining the delivery of the Plan 4.5. The implementation of the Spatial Strategy will be discussed in response to Policy 6 and the proposed allocations. 4.6. Doncaster is an integral part of the Sheffield City Region and the ambitious growth aspirations. The Strategic Economic Plan sets out the Sheffield City Region's plans to transform the local economy over the next decade. At the heart of the plan is the creation of 70,000 new private sector jobs and 6,000 new businesses. 4.7. Therefore, to achieve the aspired growth that the City Region is seeking to achieve and is securing Government funding for the level of new housing needs to reflect the ambitions of the Strategic Economic Plan. 4.8. Furthermore, the Sheffield City Region Integrated Infrastructure Plan states: A quality housing offer has a crucial role to play in the future economic growth of the City Region. It is essential to attracting and retaining a skills base that supports inward investment as we as meeting existing and future community needs and retention of Sheffield City Region (SCR) talent. It has been identified that between 70,000 and 100,000 additional homes are needed in SCR to support the proposed economic growth over the next 10 years. These will have the dual benefit of providing accommodation that underpins the proposed increase in employment (70,000 jobs), as well as the wider economic benefits that housing investment brings. Housing forms a key component of the SCR construction sector. The CBI [CBI (2012) Bridging the Gap - Backing the Construction Sector to Create Jobs] estimates that every £1 spent on construction projects yields a total of £2.84 expenditure in the wider economy. It is estimated that approximately £2,000 per annum per household spending on local convenience goods, and approximately £2,700 per annum per household spending on local comparison goods can be attributed to residents in new housing. (Over the lifetime of the SEP, a similar amount would generate at least £400 million for the SCR economy). The GVA benefits that can be attributable to new housing are as follows: - Construction: material, labour professional skills and other services for construction, compounded by supply chain benefits - Household Maintenance Spend: Spend on products and services associated with each new Household - Direct Job Uptake: GVA resulting from new productive workers moving into SCR, compounded by their spend on SCR products and services - Indirect (Chain) Benefits: As SCR residents move up the housing chain, this creates new available space in different sub-markets. - Preventing Displacement: The type and location of construction may be important in mitigating losses of households from the city region that might otherwise occur. 4.9. Within this context it is important that the Council plans for new jobs and associated new homes in accordance with the Strategic Economic Plan growth aspirations. 4.10. To achieve this approach, H. Burtwistle & Son consider the Local Plan should: - Focus the majority of development upon Doncaster Main Urban Area but review the likely housing yield from existing sites with planning permission and proposed allocations to ensure that they can all be delivered within the Plan Period. This is explained further in response to Policy 3. - To focus growth and regeneration on the Main Towns of appropriate scale for their needs and the economic growth aspirations of the Borough. Rossington should be an area of growth given the provision of new infrastructure, its location near to Doncaster Airport, and the scale of economic growth planned at IPort. Thorne and Moorends should grow to reflect its location, regeneration ambitions connected with the logistics and employment parks, and level of facilities available within the designated town and local centres. Within that context Carcroft and Skellow is of similar scale to the Main Towns and should be identified as such, particularly with its provision of employment parks and location on the A1(M) and focus on regeneration and growth. - Provision should be made in the Service Towns and Larger Villages to reflect their scale and function. These are sustainable towns and villages which serve a hinterland. Wadworth is of a similar scale and function of these settlements and should therefore be defined as such, recognising its proximity and connectivity to the Main Urban Area. - Defined Villages are sustainable villages serving a rural economy and should accommodate a level of development appropriate to their scale and function in line with the provisions Framework (paragraph 78). 4.11. H. Burtwistle & Son consider that the above approach meets the Local Plan vision and objectives identified within the Local Plan but is also one that is more aligned with the principles of sustainable development. 4.12. Policy 2 establishes the strategic approach to the Green Belt within Doncaster and states that the general extent of the Green Belt will be retained. H. Burtwistle & Son is concerned that Green Belt boundaries have been drawn tightly around settlements and proposed allocations and as such does not have regard to the intended permanence in the long term so that the boundaries can endure beyond the Plan period. Policy 3 and 6 do not identify any safeguarded land. The Plan does identify reserve sites. However these sites have significant technical constraints. H. Burtwistle & Son do not consider that they are suitable pool of sites due to the significant constraints and object to their identification in the Plan. 4.13. Whilst there is no definitive guidance indicating the amount of land which should be safeguarded the Framework (2019) is clear that where necessary Local Plans should 'identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs including well beyond the plan period', and that local authorities should 'be able to demonstrate that Green Belt boundaries will not need to
Policy 2 - Spatial strategy and Settlement Hierarchy. 1. Distribution of housing should be reviewed and include more at service towns and villages. 2. Defined villages should have some growth. 3. Rossington/Thorne Moorends/Carcroft Skellow should have a greater share. 4. This would be a more sustainable approach. Reserve sites - 1. The identified sites have significant technical constraints. 2. They are not a suitable pool of sites. 3. Object to them being in the Plan. Greenbelt Boundaries 1. Boundaries as drawn are too tight. 2. Likely they will need re-drawing at next review of plan. Safeguarded land. 1. Not an adequate amount of safeguarded Land. 2. Should be identified across the spatial hierarchy.

Proposed changes: 1. Policy should reflect economic and housing growth aspirations. 2. Spatial strategy should be amended. 3. Identify safeguarded land or suitable Reserve Development Sites across the spatial hierarchy.

Response:

The approach to the distribution of housing is explained in the Housing Topic Paper. The approach allocates housing to the most sustainable locations, including economic growth to the more sustainable Main Urban Area and Main Towns, but does provide opportunities for some limited development in smaller localities to support these rural areas as set out in Policy 2 & 3. The approach to Green Belt, including the decision not to safeguard land, is discussed in the Green Belt Topic Paper. NPPF states boundaries should be clearly defined and not include land which is unnecessary to keep permanently open and that boundaries should be drawn using readily recognisable features. Reserve development sites are sites which do not count towards any housing calculations, but are sites where housing could be located if the technical constraints can be overcome.
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Therefore no new housing is proposed in the rural economy in settlements which are relatively sustainable. This approach is broadly consistent with the strategy set out in the UDP and subsequent Core Strategy. H. Burtwistle & Son are concerned that this risks focusing development in less viable areas and risks undermining the delivery of the Plan. 4.5. The implementation of the Spatial Strategy will be discussed in response to Policy 6 and the proposed allocations. 4.6. Doncaster is an integral part of the Sheffield City Region and the ambitious growth aspirations. The Strategic Economic Plan sets out the Sheffield City Region’s plans to transform the local economy over the next decade. At the heart of the plan is the creation of 70,000 new private sector jobs and 6,000 new businesses. 4.7. 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Whilst there is no definitive guidance indicating the amount of land which should be safeguarded the Framework (2019) is clear that where necessary Local Plans should 'identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period', and that local authorities should 'be able to demonstrate that Green Belt boundaries will not need to be
altered at the end of the plan period'. Given that the council considers that the majority of sites will be delivered within the plan period. It is highly likely that further alterations to the green belt will be required at the next review of the Plan. This is not consistent with the provisions of the Framework. 4.14. H. Burtwistle & Son consider that Policy 2 should establish the approach to Safeguarding land and that safeguarded land should be identified, not only provide a robust long-term Green Belt boundary but will also provide certainty for residents and developers alike in terms of likely growth locations beyond the end of the plan period. H. Burtwistle & Son therefore suggest that such land be allocated in the Plan across the spatial hierarchy, including smaller settlements per the earlier spatial approach. 4.15. H. Burtwistle & Son consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 4.16. However, H. Burtwistle & Son consider that with the proposed changes to the strategy and establishing the approach to safeguarding land the Local Plan can be found sound. H. Burtwistle & Son will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 4.17. To overcome the objection and address soundness matters, the Council should: - Reflect economic and housing growth aspirations - Amend the Spatial Strategy as indicated - Identify safeguarded land or suitable Reserve Development Sites across the spatial hierarchy

Summary:
The Local Plan's Spatial Strategy and distribution does not provide an appropriate development pattern that supports economic growth and sustainable development within all market areas. The Strategy focusses growth towards Doncaster, followed by the Main Towns and then a smaller element in the Service Towns and Larger Villages and then no development in other defined villages. No new housing is proposed in the rural economy in settlements which are relatively sustainable. This approach is broadly consistent with the strategy set out in the UDP and subsequent Core Strategy. Concerns that this risks focusing development in less viable areas and risks under delivery. Policy 2 establishes the strategic approach to the Green Belt within Doncaster and states that the general extent of the Green Belt will be retained. Concerned that Green Belt boundaries have been drawn tightly around settlements and proposed allocations and as such does not have regard to the intended permanence in the long term so that the boundaries can endure beyond the Plan period. Policy 3 and 6 do not identify any safeguarded land. The Plan does identify reserve sites. However these sites have significant technical constraints. Do not consider that they are suitable pool of sites due to the significant constraints and object to their identification in the Plan. Given that the council considers that the majority of sites will be delivered within the plan period it is highly likely that further alterations to the green belt will be required at the next review of the Plan and safeguarded land should be identified across the spatial hierarchy, including smaller settlements per the earlier spatial approach. H Burtwistle & Son consider that with the proposed changes to the strategy and establishing the approach to safeguarding land the Local Plan can be found sound. To overcome the objection and address soundness matters, the Council should: - Reflect economic and housing growth aspirations - Amend the Spatial Strategy as indicated - Identify safeguarded land or suitable Reserve Development Sites across the spatial hierarchy

Response:
The approach to the distribution of housing is explained in the Housing Topic Paper. The approach allocates housing to the most sustainable locations, including economic growth to the more sustainable Main Urban Area and Main Towns, but does provide opportunities for some limited development in smaller localities to support these rural areas as set out in Policy 2 & 3. The approach to Green Belt, including the decision not to safeguard land, is discussed in the Green Belt Topic Paper. NPPF states boundaries should be clearly defined and not include land which is unnecessary to keep permanently open and that boundaries should be drawn using readily recognisable features. Reserve development sites are sites which do not count towards any housing calculations, but are sites where housing could be located if the technical constraints can be overcome.
The JRP agrees in principle with the 'Spatial Strategy and Settlement Hierarchy'. However, the figures for housing need, which include the evidence from Economic Forecasts and Housing Needs Assessment (note 1 - Peter Brett Associates (May 2018)), the Government’s Standard Housing methodology, together with DMBC’s planned economic growth figure may be inflated. Clearly plans will need reviewing regularly to ensure supply and demand is balanced.

Summary:
The JRP agrees in principle with the 'Spatial Strategy and Settlement Hierarchy'. However, the figures for housing need, which include the evidence from Economic Forecasts and Housing Needs Assessment (note 1 - Peter Brett Associates (May 2018)), the Government’s Standard Housing methodology, together with DMBC’s planned economic growth figure may be inflated. Clearly plans will need reviewing regularly to ensure supply and demand is balanced.

Response:
The general support for the spatial strategy is noted. The housing requirement is explained in the Housing Topic Paper based on evidence primarily given in the Peter Brett’s commissioned ‘Economic Forecasts and Housing Need Assessment’.
**Comment Ref:** C/Settlement Hierarchy/04013/1/004  
**Attend Examination:** Written Representation  
**Reason:**  
**Area:** Chapter 4: Strategic Approach  
**Policy:** Policy 2: Spatial Strategy & Settlement Hierarchy  

### Tests of Soundness:  

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### Comment:  
Settlement Hierarchy: (1) explains the settlement hierarchy for Main Urban Area, Main Towns, Service Towns and Villages and Defined Villages in its proposals for new development. However, there are anomalies where clarifications are required. For example, in the section on Main Urban Area (MUA) and Defined Villages, Green Lane, classified by DMBC as Brodsworth, a 'defined village', has been placed in the MUA of Scawsby, which clearly has different criteria for development. This needs clarification. (Letter from DMBC enclosed).

### Summary:  
Policy 2, Part 1: Settlement Hierarchy - explains the settlement hierarchy for Main Urban Area, Main Towns, Service Towns and Villages and Defined Villages in its proposals for new development. However, there are anomalies where clarifications are required. For example, in the section on Main Urban Area (MUA) and Defined Villages, Green Lane, classified by DMBC as Brodsworth, a 'defined village', has been placed in the MUA of Scawsby, which clearly has different criteria for development. This needs clarification.

### Response:  
Green Lane is not mentioned in Policy 2. It is shown as washed over by Green Belt on the Policies Map. The rationale for washing over Green Belt villages and settlements is given in the Green Belt Topic Paper.
The JRP agrees that, in order to make communities sustainable, some appropriate development may be required in villages and countryside and welcomes the statement of community involvement in any development. Clearly, there are challenges to ensure that these villages, identified as ‘defined’ do not stagnate. However, should DMBC continue to uphold its previous position to include the ‘call for sites’ 2014, it follows that some of the sites could be an additional supply of housing (windfalls) in the defined villages. The JRP reiterates, as in the previous response to the Local Plan in 2018, that no development, other than small scale infill should be permitted. We request that that DMBC remove these sites entirely to avoid developers coming forward with applications for development. Although a distinction has been made between ‘service villages’ and ‘defined villages’ in relation to new developments, the Local Plan states that non-residential development is justified to support a prosperous rural economy. This statement needs further clarification. For example, change of use of existing agricultural buildings should not justify larger scale industrial developments to occur in the small defined villages and hamlets.

Policy 2 does not identify allocations in the Defined Villages but instead promotes an appropriately balanced approach to supporting appropriate development in order to include a positive approach to supporting rural development. In defined villages, development will be supported “subject to other policies in the Plan”. The reference to supporting a prosperous rural economy is a reference to NPPF policy (primarily para 83) which is not repeated in the Local Plan to avoid unnecessary duplication - but this does represent the clarification sought.
5.1 Peel support the emphasis within the policy to promote sustainable growth and ensuring that development helps to create strong, sustainable, cohesive and inclusive communities. 5.2 Peel also welcomes the statement that major new employment sites will be focused at Doncaster Sheffield Airport (DSA). However, this reference to DSA should also be broadened to reflect that draft Policy 7 (DSA) seeks to deliver a significant mixed use growth area at the airport (which encompasses airside and landside employment, housing, aviation, hotel, retail and other commercial uses and community uses, all within the wider ACY area) commensurate with the ambition and vision of the DSAM. For instance, the draft policy is silent in respect of the fact that DSA has significant residential development potential and seeks to deliver, in effect, a new Central Plaza facility for DSA and the surrounding community. 5.3 For clarity, consistency and completeness, draft Policy 2 (including Table 2 - network and hierarchy of town centres) and draft Policy 3 (including the growth distribution table presented in the policy) need to refer to the full proposition at DSA to reflect and be consistent with draft Policy 7 in that the mixed use growth area proposed and supported at DSA/ACY sits outside the settlement hierarchy and housing delivery but it is, nevertheless, an integral element of the Plan - in terms of development needs, economic growth and spatial distribution of growth. It should be clear that the new Central Plaza is an allocation which means that applications which accord with the allocation will not be subject to the NPPF sequential and impact tests. 5.4 In respect of housing delivery, draft Policy 2 sets out the position in the event that the Council fails to demonstrate a five year Borough housing supply. It sets out the circumstances in which proposals to develop land for housing in the Countryside around its Level 1-3 settlements (note 2 - Doncaster Main Urban Area, Main Towns, and Service Towns and Villages) will be considered. 5.5 While the policy seeks to ensure that sustainable housing development is delivered in appropriate locations in the event a 5 year supply is not maintained, the effect of the policy could result in a stream of unplanned, sporadically located and speculative planning applications across the majority of its settlements in less sustainable locations. 5.6 Peel considers that the policy should be modified to ensure that in the event that further housing delivery is required in the absence of a five year housing land supply, such delivery should be guided to DSA in the first instance and ahead of any sporadic incursion into the open countryside. 5.7 As the DSAM articulates, DSA is a significant, well planned, mixed-use sustainable growth opportunity and has the potential to deliver up to 3,000 dwellings across sites 940 E2 and E3 and therefore has sufficient capacity to deliver further homes over and above the 1,200 units already identified in the LP as currently drafted. 5.8 There is also an additional site on the east side of Gate House Lane which was previously identified at Regulation 18 LP stage as a potential housing site (Site Ref 1010) which had yet to be assessed. On this Regulation 19 LP version, without explanation, this site has been retained as an isolated area of open countryside. This matter is discussed further in Chapter 8.

Summary:
Support emphasis on promotion of sustainable growth and creating strong, sustainable, cohesive and inclusive communities. Welcome statement major employment sites will be focussed at DSA, however the reference should be broadened to reflect draft policy 7, which seeks to deliver significant mixed use airport growth. The Policy is silent on the fact that DSA has significant residential development potential and seeks to deliver a new central plaza for the airport and community. Policy 2 and 3 need to refer to the full proposition at DSA to be consistent with Policy 7 and show that despite sitting outside the settlement hierarchy it is nevertheless an integral part of the plan in terms of development needs, economic growth and spatial distribution of growth. It should be clear that the new Central Plaza is an allocation which means that applications which accord with the allocation will not be subject to the NPPF sequential and impact tests. With regards to failure to deliver a 5 year supply, the policy could lead to a stream of unplanned sporadically located and speculative applications in less sustainable locations. In the first instance in such cases, delivery should be directed to DSA ahead of any sporadic incursion into the countryside. The masterplan shows this to be a sustainable growth opportunity with the potential for up to 3,000 dwellings. There is also the additional site east of Gatehouse Lane (1010).

Response:
It is the intention that the airport policy and proposals sit outside of the wider settlement strategy as a special case. However, in light of comments made, amendments have been made to provide a link from Policy 2 / 3 to Polcy 7. The Local Plan makes it clear that the plaza is an allocation, however this will be made clear in referencing (Now 940 E1). There is no justification to amend policies to make it so that in the absence of a 5 year supply, development is directed to the airport housing site specifically. There is also no need to allocate additional land at Gate House Lane as the settlement already has ample housing supply, and Policy 7 will allow for additional housing linked to jobs.
In order to explain further the rationale behind the suggested changes and be given the opportunity to respond to any changes the Council propose to make and any further evidence that is presented.

Area: Chapter 4: Strategic Approach

Policy: Policy 2: Spatial Strategy & Settlement Hierarchy

Tests of Soundness: Positively prepared  Effective

Comment:
5.1 Peel support the emphasis within the policy to promote sustainable growth and ensuring that development helps to create strong, sustainable, cohesive and inclusive communities. 5.2 Peel also welcomes the statement that major new employment sites will be focused at Doncaster Sheffield Airport (DSA). However, this reference to DSA should also be broadened to reflect that draft Policy 7 (DSA) seeks to deliver a significant mixed use growth area at the airport (which encompasses airside and landside employment, housing, aviation, hotel, retail and other commercial uses and community uses, all within the wider ACY area) commensurate with the ambition and vision of the DSAM. For instance, the draft policy is silent in respect of the fact that DSA has significant residential development potential and seeks to deliver, in effect, a new Central Plaza facility for DSA and the surrounding community. 5.3 For clarity, consistency and completeness, draft Policy 2 (including Table 2 - network and hierarchy of town centres) and draft Policy 3 (including the growth distribution table presented in the policy) need to refer to the full proposition at DSA to reflect and be consistent with draft Policy 7 in that the mixed use growth area proposed and supported at DSA/ACY sits outside the settlement hierarchy and housing delivery but it is, nevertheless, an integral element of the Plan - in terms of development needs, economic growth and spatial distribution of growth. It should be clear that the new Central Plaza is an allocation which means that applications which accord with the allocation will not be subject to the NPPF sequential and impact tests. 5.4 In respect of housing delivery, draft Policy 2 sets out the position in the event that the Council fails to demonstrate a five year supply housing delivery. It sets out the circumstances in which proposals to develop land for housing in the Countryside around its Level 1-3 settlements (note 2 - Doncaster Main Urban Area, Main Towns, and Service Towns and Villages) will be considered. 5.5 While the policy seeks to ensure that sustainable housing development is delivered in appropriate locations in the event a 5 year supply is not maintained, the effect of the policy could result in a stream of unplanned, sporadically located and speculative planning applications across the majority of its settlements in less sustainable locations. 5.6 Peel considers that the policy should be modified to ensure that in the event that further housing delivery is required in the absence of a five year housing land supply, such delivery should be guided to DSA in the first instance and ahead of any sporadic incursion into the open countryside. 5.7 As the DSAM articulates, DSA is a significant, well planned, mixed-use sustainable growth opportunity and has the potential to deliver up to 3,000 dwellings across sites 940 E2 and E3 and therefore has sufficient capacity to deliver further homes over and above the 1,200 units already identified in the LP as currently drafted. 5.8 There is also an additional site on the east side of Gate House Lane which was previously identified at Regulation 18 LP stage as a potential housing site (Site Ref 1010) which had yet to be assessed. On this Regulation 19 LP version, without explanation, this site has been retained as an isolated area of open countryside. This matter is discussed further in Chapter 8.

Summary:
Support emphasis on promotion of sustainable growth and creating strong, sustainable, cohesive and inclusive communities. Welcome statement major employment sites will be focussed at DSA, however the reference should be broadened to reflect draft policy 7, which seeks to deliver significant mixed use airport growth. The Policy is silent on the fact that DSA has significant residential development potential and seeks to deliver a new central plaza for the airport and community. Policy 2 and 3 need to refer to the full proposition at DSA to be consistent with Policy 7 and show that despite sitting outside the settlement hierarchy it is nevertheless an integral part of the plan in terms of development needs, economic growth and spatial distribution of growth. It should be clear that the new Central Plaza is an allocation which means that applications which accord with the allocation will not be subject to the NPPF sequential and impact tests. With regards to failure to deliver a 5 year supply, the policy could lead to a stream of unplanned sporadically located and speculative applications in less sustainable locations. In the first instance in such cases, delivery should be directed to DSA ahead of any sporadic incursion into the countryside. The masterplan shows this to be a sustainable growth opportunity with the potential for up to 3,000 dwellings. There is also the additional site east of Gatehouse Lane (1010).

Response:
It is the intention that the airport policy and proposals sit outside of the wider settlement strategy as a special case. However, in light of comments made, amendments have been made to provide a link from Policy 2 / 3 to Policy 7. The Local Plan makes it clear that the plaza is an allocation, however this will be made clear in referencing (Now 940 E1). There is no justification to amend policies to make it so that in the absence of a 5 year supply, development is directed to the airport housing site specifically. There is also no need to allocate additional land at Gate House Lane as the settlement already has ample housing supply, and Policy 7 will allow for additional housing linked to jobs.
1. Rossington Hall Investment Ltd (RHI) would generally support the settlement hierarchy detailed in the Publication Draft Policy which identifies Rossington as one of the 'seven main towns'. Rossington is a large settlement of over 13,500 residents with a good range of services and employment opportunities. The Audit (2015) undertaken by the Borough Council places Rossington second in the list of settlements (outside the main urban area) in terms of the availability of primary and secondary services and facilities. Only the combined settlements of Conisbrough and Denaby score higher. It is noted however that Rossington only fails to score the maximum because it does not have a train station and surprisingly it does not apparently meet the Council's Informal POS standard. There is perhaps little than can be done about the former, but the latter will be addressed following the creation of the new parkland on land at Rossington Grange Farm as part of the wider Torne Park development.

2. In response to feedback that the Settlement Audit could be expanded on to better understand what services have been recorded in each settlement, Settlement Profiles have been developed to aid understanding of the Settlement Audit. The Settlement Profile for Rossington states that 'the settlement has a designated local centre but based on recent evidence given the offer of goods and services is more akin to a District Centre.' The settlement profile also expands further on the open space provision - 'Rossington has sufficient formal open space (+19ha), but a deficiency of informal open space (-2.87ha).

3. Overall therefore Rossington is already one of the most sustainable locations in the Borough, in which to live. This is confirmed in the Settlement Profile which states that 'Rossington is one of the best provided for settlements in the borough in terms of service provision.' This position will improve further in the near future as a result of the above as well as employment opportunities at iPort, Doncaster Sheffield Airport and Torne Park. iPort alone is expected to provide over 5000 new jobs. In line with representations submitted in Connection with Policy 3 - Level and Distribution of Growth, Rossington should be identified as a location for meeting more than just 'local needs housing growth' 'on a pro-rata basis'. It should instead be the focus a for a significantly larger % of the economic-led housing growth than currently proposed and additional land should be allocated for housing development to reflect this position/potential. On this basis RHI believe the Local Plan to be ineffective and has not been positively prepared in order to meet the real housing need.

4. The land south of Grange Road, Rossington (Figure 1 below), identified as Site No 306 in the Council's Site Assessment Report, would represent a sustainable urban extension in a location that is not at risk of flooding and is close to shops, community facilities as well as existing and future employment opportunities. The Council's own Site Assessment Report confirms that the only constraint to housing development on this site is a policy constraint i.e. its Green Belt status. Unlike most other sites considered no other factors are identified would prevent development. (SEE EMAIL FOR Figure 1 Land South of Grange Rd, Rossington - Site 306) 5. This assessment is confirmed below which also demonstrates that the inclusion of this site in the Green Belt can no longer justified, if indeed it ever was in the first place. Changes in local circumstances, in particular the development of iPort and the land raising and the creation of parkland on the Rossington Grange Farm land to the west, (see Figure 2 overleaf) means Site 306 does not need to be kept permanently open to achieve any of the five purposes for including land in the Green Belt. On this basis, the Local Plan is not compliant with national policy. RHI object to this site remaining within the Green Belt. 6. Paragraph 134 of the NPPF states that there are five purposes for including land within the Green Belt: a) to check the unrestricted sprawl of large built-up areas; As the land South of Grange Road is being promoted for development through the Development Plan process its subsequent development could not be categorised as 'unrestricted sprawl' but would represent a planned expansion of the urban area that is both proportionate and necessary to address the anticipated development needs of Rossington and the Borough as a whole, both within and beyond the plan period. As a result, the Green Belt 'purpose' is not relevant in such circumstances. b) to prevent neighbouring towns merging into one another; The land South of Grange Road lies on the south western edge of New Rossington, with the nearest town being 3km to the west (Wadworth). It is however important to note that the character of the gap between these two settlements has changed significantly in the last couple of years and is due to change even more in the future following the completion of the iPort development and development at Torne Park. Collectively these developments have already significantly reduced the gap between the built-up areas of Rossington and Wadworth (as shown at Figure 2 below).

Any development on land South of Grange Road will lie well to the east of these new developments and as a result have no practical impact on the extent or perception of separation. It is also noted that the site does not extend any further south that the existing southern limit of the built-up area of New Rossington. As a result, development on the land south of Grange Road would not result in any merging of neighbouring towns into one another. As a result, the land South of Grange Road does not need to be allocated as Green Belt or retained to prevent neighbouring town merging into one another. c) to assist in safeguarding the countryside from encroachment; The site is physically well defined to the west, north and east and that as a result its removal from the Green Belt and allocation for housing or safeguarding would not result in any further pressure for development or encroachment on the surrounding countryside in this part of Rossington. The site itself is in intensive agricultural use. It is not identified as being of particular ecological or landscape or recreational value and being on the edge on urban areas it suffers from various urban fringe problems e.g. trespass. At the same time it occupies a sustainable location for new housing development. The Council, in its emerging Local Plan, already acknowledges the need to identify Greenfield land to meet the Borough's housing requirement over the plan period and in such circumstances we consider the land south of Grange Road to offer a sustainable development option with minimal impact in terms of countryside encroachment. d) to preserve the setting and special character of historic towns; and This purpose is not relevant to the land south of Grange Road. The site makes no contribution towards the setting or special character of any historic town. e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The recycling of by far the largest area of derelict land in Rossington (i.e. the
former Colliery site) is already committed and well underway. The allocation of the land South of Grange Road for housing through the Local Plan will not compromise these works, but instead will assist in supporting the regeneration of Rossington. The more new housing that can be attracted to New Rossington, the more people will be attracted to the town with the resulting beneficial impact on the vitality and viability of local shops, services and community facilities. The prospect of 5000+ jobs being created on the edge of the town provides a unique opportunity to revitalise New Rossington. It needs to be complemented by new good quality housing in attractive and sustainable locations in and around Rossington to attract and retain the workforce. Housing development on the Rossington Colliery site on its own is not sufficient to maximise these benefits and additional sites need to be allocated through the Local Plan. 7. In the light of the above RHI would, the first instance, seek the allocation of Site 306 for housing as part of this emerging Local Plan in order to meet housing needs and demands and provide a range and choice of sites in the settlement. Failing this RHI would seek its removal from the Green Belt and its allocation as Safeguarded Land for potential housing development beyond the current Plan period. 8. Further to this, RHI objects to the lack of Safeguarded Land in the Local Plan. It is not appropriate for a Local Plan with a significant amount of Green Belt land to not have a Safeguarded Land Policy. It is not effective, justified or in line with national policy. Settlements within the Green Belt should have the capacity to expand in the future. (SEE EMAIL FOR Figure 2) PROPOSED CHANGE 1. As set out above, RHI consider the Local Plan is not sound on all aspects. 2. In order to make the Local Plan sound a Safeguarded Land policy should be included. This would make the Local Plan effective, justified and national policy compliant. 3. Further to this, Policy 2 needs to allow more flexibility with regard to housing allocations rather than being distributed on a ‘pro-rata basis’. This would mean that the plan is positively prepared and allows for development to adapt as circumstances change across the plan period. 4. RHI consider that the site South of Grange Road, Rossington should be removed from the Green Belt as it fails to meet any of the five purposes set out a paragraph 134 of the NPPF. This would mean that the Local Plan is compliant with national policy. 5. On this basis RHI would suggest that Rossington should be a focus for a larger proportion of housing development than currently proposed and the site South of Grange Road should be allocated or safeguarded for housing development to reflect this position/potential.

Summary:

RHI generally support settlement hierarchy but consider the Local Plan is not sound on all aspects. Settlement Audit should be expanded on to better understand, Rossington is considered one of the most provided for settlements in the borough, and should be the focus for a significantly larger % of growth. In order to make the Local Plan sound a Safeguarded Land policy should be included. This would make the Local Plan effective, justified and national policy compliant. Policy 2 needs to allow more flexibility with regard to housing allocations rather than being distributed on a ‘pro-rata basis’. This would mean that the plan is positively prepared and allows for development to adapt as circumstances change across the plan period. RHI consider that the site South of Grange Road, Rossington should be removed from the Green Belt as it fails to meet any of the five purposes set out a paragraph 134 of the NPPF. This would mean that the Local Plan is compliant with national policy. On this basis RHI would suggest that Rossington should be a focus for a larger proportion of housing development than currently proposed and the site South of Grange Road should be allocated or safeguarded for housing development to reflect this position/potential.

Response:

General support to Rossington's identification as a Main Town welcomed and the POS standard is based on current/existing provision as all settlements may have an improved/different 'score' through the Audit once factoring in current/future development and proposals. The spatial strategy has been developed through several rounds of consultation (Reg 18 stages) with summaries published along the way. Approaches to more dispersal/greater concentration/current Core Strategy approach etc were all options that were considered and subject to SA. A Settlement Background Paper was published alongside the Publication Plan (and previous 2018 consultation) setting out more details and will be updated and republished as a Topic Paper for Submission. There has been various competing calls throughout the process for different settlements to have a "bigger slice of the cake" but none of them are considered to amount to a more justified or coherent strategy than what has been proposed. It is not considered there are exceptional circumstances to allocate sites in the Green Belt at Rossington when its housing requirement for the plan period (and beyond) has been identified through non-Green Belt supply. It is proposed that IPort itself remains washed over by Green Belt given the very special circumstances that led tot e granting of permission for this facility included the need to be located adjacent to the the existing rail infrastructure. There is no safeguarded land proposed through the Local Plan as it is not considered that the requirements of NPPF para 139c has been identified i.e. 'where necessary' as a future strategy may not necessitate the need for Green Belt release or alterations.
3.1 This policy is considered unsound as it is not justified or effective. 3.2 The policy seeks to distribute the majority of new development to the most sustainable locations, these being the Main Urban Area of Doncaster, the 7 Main Towns and the 10 Service Towns and Villages. This general principle is considered appropriate and is supported. It is, however, important that this is sustainable and deliverable. 3.3 Bawtry is identified as in the 'Service Towns and Villages' category. The Local Plan identifies that this level of settlement will "provide a good range of services meeting their own needs and the local area. To maintain and enhance their role as service towns and 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 to meet their local needs, as well as renewing and regenerating any run-down neighbourhoods." 3.4 The identification of Bawtry within the Service Town and Village tier is supported. It is a high performing settlement and provides many primary services. It is well served by a district centre containing local services and amenities, including a primary school and health care provision. It also has excellent public transport connections to higher level centres such as Doncaster, Worksop, Retford and Gainsborough through regular bus services. Bawtry is, therefore, considered a sustainable settlement suitable for new growth. 3.6 In terms of new homes the policy seeks to deliver at least 50% within the 'Main Urban Area' of Doncaster and 40% within the 7 'Main Towns' with just 10% allocated to the 'Service Towns and Villages'. The derivation of this split is discussed within the 'Sustainability Appraisal of the Doncaster Local Plan 2015-2035: Publication Version' (SA) and 'Settlement Background Paper'. The key criteria used is a 'proportional' split based upon population and the 'economic element' of the housing requirement uplift being split between the Main Urban Area and Main Towns (Settlement Background Paper para 3.1.6 and 3.1.7). None of the economic uplift element is distributed to lower tier settlements. 3.7 The distribution takes no account of other factors such as affordable housing need, deliverability or development opportunities. The Council’s viability evidence ‘Whole Plan Viability Testing - Update, May 2019’ (2019 Viability Report) identifies the challenges of delivering within many areas of the borough. The 2019 Viability Report identifies three ‘value zones’ across Doncaster, these being High, Medium and Low. The low value zones are generally concentrated in and around the Main Urban Area and Main Towns. 3.8 The 2019 Viability Report highlights that; "viability pressure was at its highest for schemes in low value areas. These schemes were shown to be unviable if a 20% (or higher) affordable housing provision was applied. However, some schemes did return a viable outcome if the affordable housing provision was reduced to 15%, although typically this also required a reduction in the other 5106 policy contributions.” (our emphasis, para. 7.5). 3.9 It is notable that Policy 8 of the Local Plan reduces affordable housing to 15% in the low value areas. However, based upon the output from the 2019 Viability Report it is likely that many schemes within these areas will remain unviable even with the reduced level of affordable housing. This threatens the deliverability of the plan and the ability to meet the affordable housing needs of the area. 3.10 The Council’s background paper ‘Housing Need Study / Affordable Housing Need’ identifies a need for 209 affordable dwellings per year. The 2019 Viability Report highlighted that; "viability pressure was at its highest for schemes in low value areas. These schemes were shown to be unviable if a 20% (or higher) affordable housing provision was applied. However, some schemes did return a viable outcome if the affordable housing provision was reduced to 15%, although typically this also required a reduction in the other 5106 policy contributions.” (our emphasis, para. 7.5). 3.11 To ensure that the plan is deliverable and that it provides the greatest opportunity to deliver much needed affordable housing it is recommended that an increased percentage of housing be allocated to lower tier settlements. Given their inherent sustainability the majority of this re-distribution should be within the Service Towns and Villages, such as Bawtry.
2.8 This policy contains a large amount of information, some of which should logically be included as supporting text rather than policy wording. The text should direct the reader to the background document/s that justify the percentage distribution of new homes (at least 50% to the Main Urban Area, about 40% to the Main Towns and around 10% to the Service Towns and Larger Villages). It is not clear whether the overall percentage distributions to the three settlement tiers have been influenced by seeking to minimise Green Belt, or whether it is based solely on the sustainability and size of settlements. There is no reference in the overall strategy part of this policy which makes reference to Green Belt constraints in the Borough. The Topic Paper which will explain the Plans Settlement Strategy and Hierarchy is not available until Plan Submission, which does not give representors the opportunity of understanding or commenting on the strategy. 2.9 The Spatial Strategy is not, therefore, justified by the evidence and is unsound.

Summary:
The spatial strategy is not justified by evidence and is unsound. It is unclear whether the overall percentage distribution to the tiers have been influenced by seeking to minimise Green Belt or solely on the sustainability and size of settlements. The topic paper is unavailable until submission which does not give representors the opportunity of understanding or commenting on the strategy.

Response:
The strategy approach was explained in both the Settlement Background Paper in 2018, and the Housing Background Paper and Green Belt Topic Paper for the 2019 consultation, and is now further covered in the Housing Topic Paper. These documents show this to be both sound and justified, being in accordance with consultation on the settlement strategy.
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2.10 We maintain our objection to the joining of Auckley and Hayfield Green as a combined settlement. The justification provided for the treatment of Auckley and Hayfield Green as a combined settlement is inadequate. In the Settlement Audit (February 2017 update) Auckley and Hayfield Green were treated as separate settlements, and in the settlement scoring Auckley performed better than Hayfield Green in terms of the number of Primary Services and the number of combined Primary and Secondary Services. The Homes and Settlements Consultation (March 2016) however, treats Auckley and Hayfield Green as a combined settlement. 2.11 The Settlement Background Paper that forms part of the Local Plan Evidence base makes reference to the Settlement Audit and the merging of Auckley and Hayfield Green Community Profile Areas. The explanation given is simply "adjacent settlements and Parish boundary". There is inadequate justification. Hayfield Green is no nearer Auckley than it is to Branton, but there is no suggestion of merging those two settlements. The parish boundary is a historical artefact that pre-dates the establishment of what is effectively a new settlement at Hayfield Green. Nothing has changed since the February 2017 Settlement Audit to warrant that amendment. 2.12 There are two other combined settlements within the Service Towns and Villages tier of the settlement hierarchy. These are Barnburgh - Harlington, and Carcroft - Skellow. The distances between the respective edges of the built form of these three combined settlements are as follows: Auckley to Hayfield Green c. 540 metres Barnburgh to Harlington c. 80 metres Carcroft to Skellow c. 0 metres 2.13 It is clear from the above distances and the below extracts from the Local Plan interactive map that Auckley and Hayfield Green are materially different to the other two combined settlements. The settlement boundary is clearly defined around Auckley, separate from Hayfield Green settlement limit, whereas Barnburgh/Harlington and Carcroft/Skellow are considered as combined settlements with a development limit surrounding and joining them. SEE EMAIL FOR Plan showing Auckley and Hayfield Green - Individual settlement boundaries and Plans showing Carcroft - Skellow and Barnburgh - Harlington. Both with combined settlement limits.) 2.14 Auckley has a population of 2,038 according to the Settlement Audit and scores 3 against the Primary facilities score, and scores 2 against the secondary facilities score giving a combined score of 5. The Homes and Settlements Consultation categorised a larger village as having a population of over 1,000 and 4 or 5 key services. Auckley would therefore fall into this category as a stand alone settlement and would justifiably be considered as a standalone 'larger village' within the 'Service Village and Larger Village' tier of the Settlement Hierarchy. Without doing so, local housing need in Auckley will not be met. 2.15 For the reasons outlined above Auckley should be considered as a separate settlement to Hayfield Green, and receive its own housing requirement separate from Hayfield Green within the Service Towns and Villages tier of the settlement hierarchy. 2.16 The Settlement Hierarchy is not, therefore, justified by the evidence nor will it be effective in meeting the Plans objective of ensuring local housing need is met in each settlement. It is therefore unsound.

Summary:
The 2017 settlement audit treats them differently, but the Homes and Settlements (2016) does not. Hayfield Green is no nearer to Auckley than it is to Branton and the parish boundary is a historical artefact that pre-dates the establishment of what is effectively a new settlement at Hayfield Green. Since 2017, nothing has changed to warrant this amendment. The other merged settlements are far nearer to each other: Auckley to Hayfield Green c. 540 metres Barnburgh to Harlington c. 80 metres Carcroft to Skellow c. 0 metres Auckley - Hayfield Green is clearly materially different to these, where the respective settlement limits are well defined as opposed to combined at Barnburgh - Harlington and Carcroft - Skellow. Given service provision in Auckley, it would fall into the category of service town and village on its own and would have its own need to meet, which would not be met as the requirement is met in Hayfield Green at present. The settlement hierarchy is therefore not justified by evidence, nor will it be effective in meeting the plan objective of ensuring local housing need is met in each settlement, and is therefore unsound.

Response:
The Settlement Audit assesses these individually due to using Community Profile Areas to assess service provision - which are often on a smaller scale to the actual proposed settlements, however these are then combined where necessary to show the proposed overall area. This is also the case in other settlements, including the Main Urban Area, Barnburgh and Harlington. Throughout the Local Plan, Auckley and Hayfield Green have always been proposed as one settlement, and this is reflective of the Parish (and the Neighbourhood Plan area) which includes both areas.
Tests of Soundness:

Comment:
Paragraph 4.17 It is felt that the following sentence is open to miss interpretation and should be re-worded. "Opportunities to reduce the causes and impacts of flooding from new development should be sought.” NPPF is clear that new development should not result in an increase in flood risk on or off site, the above statements suggest that in some cases this may be acceptable. We would therefore recommend that the wording is amended to: Opportunities to reduce the causes and impacts of flooding through new development should be sought.

Summary:
Paragraph 4.17 is open to misinterpretation and should be re-worded. "Opportunities to reduce the causes and impacts of flooding from new development should be sought.” NPPF is clear that new development should not result in an increase in flood risk on or off site, the above statements suggest that in some cases this may be acceptable. We would therefore recommend that the wording is amended to: Opportunities to reduce the causes and impacts of flooding through new development should be sought.

Response:
The wording in para 4.17 reflects wording in NPPF para 157c. It does not require amendment.
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<td>Policy:</td>
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**Comment:**

Edenthorpe, Kirk Sandall, Barnby Dun, Hatfield, Dunsville and Thorne area of Doncaster has taken a significant majority of the housing allocation within Doncaster. The spread of housing development should be more equal throughout Doncaster. Although unfavourable (to mainly developers) due to a reduction in profits, a new village should be considered in Doncaster instead of sprawling villages continuously. The housing methodology adopted with the Local increases strain on doctors, dentists and schools. An independent, sufficient village with the amenities and services would also elevate many constraints associated with the expansion of existing villages.

**Summary:**

The spread of housing allocation should be more dispersed with too much directed to Barnby Dun, Hatfield-Stainforth, Thorne, and Edenthorpe-Kirk Sandall areas. A new village should be considered instead of sprawling villages continuously. Housing puts strains on infrastructure such as schools, GPs, dentists.

**Response:**

A new settlement was considered early in the process but ruled out given the time this could take to establish and the need to continue to regenerate urban areas. Barnby Dun has a comparatively modest housing requirement of 105 dwellings and a suitable site has been found which can deliver this. It is not felt that the distribution of sites is overly focussed in the areas mentioned. There are permissions in Edenthorpe for c. 1000 houses and 3100 at Hatfield - Stainforth, but these are also clearly physically separate to Barnby Dun. It is not considered that site 147 leads to sprawl, and this site would actually round off the built form here.
Comment Ref: C/Unpopular Expansion/04517/1/003

Name: Daniel Meekin

CUSREF: 04517

Date: 29/09/2019

Organisation:

Comment Ref: C/Unpopular Expansion/04517/1/003

Attend Examination: Written Representation

Representing:

Reason:

Area: Chapter 4: Strategic Approach

Policy: Policy 2: Spatial Strategy & Settlement Hierarchy

Tests of Soundness:

Comment:

The excessive rate of expansion throughout Doncaster is intrusive and unpopular to residents throughout the Borough. There is a general feeling that the rate of growth is too quick and important factors are dis-regarded in favour of increasing the number of residents in Doncaster. This is evident by the allocation of development land in open countryside areas before the re-utilisation of brownfield sites. The over expansion of housing throughout Doncaster negatively impacts efforts to invigorate deteriorating high street retail. Congestion in Doncaster is a much greater issue than what is briefly outlined in the Local Plan. Further thorough research should be conducted into the implications of the high number of houses and resultant traffic on accessibility to Doncaster high streets and amenities.

Summary:

Too much emphasis on growth which is not supported by communities. Brownfield sites should come forward before open countryside. Over expansion of housing negatively impacts on efforts to invigorate deteriorating high street retail. Congestion is much greater than that outlined in the local plan and needs more research into the impacts new housing will have on traffic.

Response:

Brownfield sites have all been considered and allocated before greenfield sites. There are no brownfield opportunities in Barnby Dun that can deliver the required levels of housing. Local traffic impacts have been modelled by AECOM and impacts / solutions are proposed in their transport modelling report. Not clear as to how housing growth impacts on high street retail. Housing allocations here are to support local needs and reflect the requirement for Barnby Dun without policy intervention over the plan period.
**Comment Ref:** C/Policy 2/04706/1/001  
**Attend Examination:** Attend Hearing  
**Reason:** We wish to discuss with the Inspector and Council our concerns regarding the Open Space allocation at Warmsworth. There is detailed evidence which will need to be discussed orally.

**Area:** Chapter 4: Strategic Approach  
**Policy:** Policy 2: Spatial Strategy & Settlement Hierarchy

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**Comment:**

We support the overall strategy which states that Doncaster’s Spatial Strategy will focus on delivering sustainable growth, appropriate to the size of individual settlements, that meets the needs for new homes and jobs, regenerates places and communities, and supports necessary improvements to infrastructure, services and facilities. It is important that development should help create and maintain strong, sustainable, cohesive and inclusive communities. Whilst we support the use of brownfield sites, there is a great need for greenfield sites to be developed to achieve the Plan Strategy as it is important to acknowledge that the remaining previously developed / brownfield sites are limited and can have viability implications (e.g. costs linked with remedial works associated with contamination etc.). We agree with the assertion that decisions on the location and scale of development should be informed by Doncaster’s Settlement Hierarchy. We fully support the inclusion of a Settlement Hierarchy within the Local Plan, as it is agreed that this a great way of indicating the best locations for future development (both for local residents, landowners and developers). The settlement hierarchy shows what types and levels of development are appropriate for settlements in each of the six ‘tiers’ set out in the hierarchy. For example, Doncaster Main Urban Area will be the main focus for development in the Borough. The Main Urban Area is defined as the contiguous built-up area of Doncaster comprising a number of distinct but connected districts arranged around the town-centre; such as Warmsworth. We support this approach. In addition to supporting the use of a Settlement Hierarchy, we also support the use of Development Limits to be drawn around settlements, but only if these limits are not onerously tight. We therefore welcome the flexibility proposed within the draft policy text which states that “Appropriate development will be supported outside settlement Development Limits, new allocations and the Green Belt, if adjacent or close to a Development Limit of a settlement?”, subject to meeting four set criteria, however, we request that the following text is deleted “in levels 1-3 above”, as it is vital that all settlements are able to grow commensurate to their size. If settlements are tightly constrained by Development Limits and Green Belt, (for example the village of Clayton has limited infill opportunities and the Green Belt is drawn tightly around the existing built up areas restricting any future growth), then settlements risk future demise if the community cannot grow to support the existing services and facilities. Clayton, for example, is a village where there is support for some growth, but such aspirations cannot be met due to the policy restrictions associated with the Green Belt. As part of the emerging Local Plan, both the settlement limits and Green Belt needs reviewing for this settlement. It is our understanding that this would be supported as the community would like to prepare a Neighbourhood Plan to allow some flexibility regarding new development going forward. The Council should therefore support future development in Clayton to ensure that the positive Neighbourhood Plan can be prepared in the future. Furthermore, whilst we support the policy in principle, subject to some amendments, it is considered that development per each settlement should be monitored regularly as some allocations may not come forward for some time. If this does occur then this should not preclude other development (in addition to the allocations) from taking place as it is important that settlements continue to grow throughout the Plan period to remain viable and to support the existing and future residents and the associated local services and facilities. Additionally, we also have some concerns over the description that infill sites are defined as “the filling of a small gap in an otherwise built up frontage - a small gap is defined as a gap which fronts onto a highway and has a width less than 20 metres between existing buildings”. It is considered that this is too prescriptive and therefore should be amended to the following: “The development of a relatively small gap between existing buildings”; and each site should be considered on its own individual merits. Subject to the above changes regarding development limits, supporting all settlement with regard to future growth and infill sites, we have no further comment to make on this policy.

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We wish to discuss with the Inspector and Council our concerns regarding the Open Space allocation at Warmsworth. There is a small gap in Savills Warde-Aldam Estates. Policy 2: Spatial Strategy & Settlement Hierarchy. Attend Hearing 27/09/2019 Savills Chapter 4: Strategic Approach

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To allow our concerns to be fully understood and be explored in detail and in order to exercise our legal right to be given the opportunity of attending a hearing (section 20(6) of the Planning and Compulsory Purchase Act 2004),

Policy 2 Spatial Strategy and Settlement Hierarchy (Strategic Policy) attempts to set out an unduly restrictive approach towards rural development that extends well beyond national planning policy in the NPPF and Planning Practice Guidance. As such the plan fundamentally fails to have due regard to national planning policy and the plan advances no reasoning why such an approach is justified in Doncaster. The NPPF approach towards the role of rural housing was previously set out in paragraphs 54 and 55 of the 2012 NPPF. This is now set out in paragraphs 77, 78 and 79 of the 2019 NPPF, however the overall approach towards rural housing has not been amended, therefore previous appeal and case law interpretations of paragraph 55 of the 2012 NPPF remain valid and relevant to the determination of conformity with national planning policy. Paragraph 78 of the 2019 NPPF states: "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby." In some respects this approach is more explicit than the former NPPF that villages, even small villages should be given an opportunity to grow and thrive. The Doncaster Local Plan seeks to resist residential development in the countryside generally. It goes well beyond resisting isolated dwellings in the countryside. Sites in settlements and groupings of development that may not be identified as a defined village can in no way can be considered to be isolated in our view. The Framework does not define "isolated", therefore Inspectors tend to rely on the everyday definition of the word as meaning lonely or remote or as the Courts have concluded 'far away from people or places'. The countryside is proposed to wash over settlements that are not identified as a defined village and groupings of development that are not visually or physically isolated, and are not functionally isolated relative to services and facilities. The High Court judgment in Braintree District Council v Secretary of State for Communities and Local Government & Ors [2017] handed down on 15th November 2017 regarding paragraph 55 of the 2012 NPPF and new isolated homes in the countryside. The High Court judgment considers that "isolated" should be given its ordinary objective meaning of "far away from other places, buildings or people; remote". Consequently any proposed new residential property within or on the edge of a settlement including settlements that are not identified as a defined village and groupings of development cannot be considered isolated in terms of paragraph 55 of the previous 2012 NPPF, now paragraph 79 of the 2019 NPPF. This judgement has been confirmed as being perfectly valid in the Court of Appeal. At this time the obiter of Lord Justice Lindblom in the Court of Appeal in Braintree District Council v Secretary of State for Communities & Local Government [2018] is highly relevant. In paragraph 32 of his judgement he states: "What constitutes a settlement for these purposes is also left undefined in the NPPF. The NPPF contains no definitions of a "community", a "settlement", or a "village". There is no specified minimum number of dwellings, or population. It is not said that a settlement or development boundary must have been fixed in an adopted or emerging local plan, or that only the land and buildings within that settlement or development boundary will constitute the settlement. In my view a settlement would not necessarily exclude a hamlet or a cluster of dwellings, without, for example, a shop or post office of its own, or a school or community hall or a public house nearby, or public transport within easy reach. Whether, in a particular case, a group of dwellings constitutes a settlement, or a "village", for the purposes of the policy will again be a matter of fact and planning judgment for the decision-maker. In the second sentence of paragraph 55 the policy acknowledges that development in one village may "support services" in another. It does not stipulate that, to be a "village", a settlement must have any "services" of its own, let alone "services" of any specified kind." The obiter of Lord Justice Lindblom is clear that in his view the NPPF does not require a grouping of development to be either within a defined settlement boundary or be designated as such in a development plan to fall to be considered to be a 'settlement'. In addition he is also clear that a grouping of development does not need to be any minimum size or have any services and facilities to be deemed to be a 'settlement' in planning terms. The obiter of Lord Justice Lindblom in paragraphs 30 and 31 of the Court of Appeal judgement also referred to "isolated" as meaning "standing apart or alone, detached or separate from other things or persons; unconnected with anything else; solitary?" He then went on to clearly state: "In my view, in its particular context in paragraph 55 of the NPPF, the word "isolated" in the phrase "isolated homes in the countryside" simply connotes a dwelling that is physically separate or remote from a settlement. Whether a proposed new dwelling is, or is not, "isolated" in this sense will be a matter of fact and planning judgment for the decision-maker in the particular circumstances of the case in hand." The restrictive approach of Policies 2 and 26 is in our view clearly inconsistent with National Planning Policy in paragraphs 78 and 79 of the NPPF; the advice in Planning Practice Guidance; and case law established in both of the Braintree cases. Again the obiter of Lord Justice Lindblom in the Court of Appeal in Braintree District Council v Secretary of State for Communities & Local Government [2018] is highly relevant. In paragraph 29 of his judgement he states: "?the policy explicitly concerns the location of new housing development. The first sentence of paragraph 55 tells authorities where housing should be located. The location is "where it will enhance or maintain the vitality of rural communities". The concept of the "vitality" of such a community is wide, and undefined. The example given in the second sentence of paragraph 55 - "development in one village" that "may support services in a village nearby" - does not limit the notion of "vitality" to a consideration of "services" alone. But it does show that the policy sees a possible benefit of developing housing in a rural settlement with no, or relatively few, services of its own. The third sentence of the paragraph enjoins authorities to avoid "new isolated homes in the countryside". This is a distinction between places. The contrast is explicitly and simply a geographical one. Taken in the context of the preceding two sentences, it simply differentiates between the development of housing within a settlement - or "village" - and new dwellings that would be "isolated" in the sense of being separate or remote from a settlement. Under the
Response:

The policy as drafted is considered to be positive and in line with NPPF and the need to balance supporting rural uses and the vitality of smaller settlements in the countryside with channelling development to sustainable locations in line with wider spatial planning objectives. The Local Plan does not intend to repeat national planning policy.
2.4 The Council outline their proposed settlement hierarchy and level of distribution within the policy. It is noted that at least 50% of the baseline housing growth figure (8,775 homes) will be located within the ‘Main Urban Area’ of Doncaster, with 40% being delivered in the ‘Main Towns’ of Dunscroft, Dunsville, Hatfield & Stainforth, Thorne & Moorends, Conisbrough & Denaby, Mexborough, Armthorpe, Rossington, and Adwick & Woodlands. The remaining 10% of the housing requirement, which equates 877 over the entire plan period (just 44 dwellings per year) would be delivered across the ‘Service Towns and Villages’. 2.5 As per our previous representations our Client objects to the distribution of housing through the settlement hierarchy; it is too heavily focused on both the Main Urban Area and the Main Towns, with 90% of the Council’s housing to be delivered in these areas. 2.6 In addition, our Client objects to the baseline housing growth figure (8,775 houses) being used when distributing housing. This figure ignores the planned economic growth over the plan period, which would result in an additional 327 homes per year. This would result in an additional 33 dwellings per year across settlements like Bawtry. 2.7 There are considered to be deliverability issues in Doncaster and some of the Main Towns and this is reflected by the fact that the Council have consistently failed to demonstrate a 5 year housing land supply, as demonstrated by planning appeal decisions. The proposed settlement hierarchy and distribution is very similar to the existing approach set out in the adopted Core Strategy, and it has to be questioned why the Council are taking such a similar approach, when it has led to issues previously and is perpetuating failure. 2.8 We have genuine concerns that by carrying the same approach through to the new Local Plan will again increase the risk of the Council not being able to deliver the required level of housing, as well as being unable to demonstrate a 5 year housing land supply. This will inevitably leave the Council susceptible to planning applications for windfall development. A sound approach would be to reduce the reliance in areas which have previously had deliverability issues. 2.9 Whilst it is accepted that the most sustainable settlements should generally accommodate higher levels of growth, the current distribution is unacceptable. Our Client suggests that growth should be more evenly distributed across the Authority, with higher levels of growth in the Service Towns and Villages. The Council have a duty to ensure that they deliver the level of housing set out within the Plan and it is important that housing is directed towards areas where it can be delivered and where people want to live. 2.10 Preventing towns and villages from growing is not acceptable. The provision of additional housing assists in ensuring the services and facilities in such places can remain in business through increasing investment. In several instances villages have aging populations and the provision of new housing can assist in providing opportunities for younger generations to get on the housing ladder in locations they want to live. This in turn helps to provide mixed communities, an element of sustainability which is often overlooked. 2.11 The proposed distribution is unsound as it fails to meet the tests outlined in paragraph 35 of the Revised National Planning Policy Framework. The approach is not effective or positively planned and should be revised to spread the distribution more evenly within the settlement hierarchy. 2.12 Our Client objects to the Council’s proposals in respect to the development of non-allocated sites within settlement boundaries in the Main Urban Areas, Main Towns, Service Towns and Villages and defined villages. As per previous Draft Policies, Policy 2 continues to state that development of non-allocated sites within development limits will be supported in appropriate locations, which are defined as sites that would “retain the core shape and form of the settlement; not significantly harm the settlement’s character and appearance; and not significantly harm the character and appearance of the surrounding countryside or the rural setting of the settlement”. 2.13 The Revised National Planning Policy Framework has a clear presumption in favour of development that falls within development limits and it is unacceptable and unreasonable to add a negatively worded policy which seeks to restrict development in such areas. The qualifying criteria for an ‘appropriate location’ are all matters that should be covered by separate policies, as such, this element of the policy should be deleted as it is unsound. 2.14 Policy 2 states that in exceptional circumstances, and subject to the demonstration of clear local community support, residential development in appropriate locations may also be supported in the Countryside on land adjacent to the development limit of a Defined Village. Our Client objects to this approach based on the fact that all planning applications should be considered against adopted planning policy and material planning considerations, not influenced or based on community support.

Summary:
Policy 2 - Spatial Strategy and Settlement Hierarchy 1. Object to distribution of housing through settlement hierarchy. Too focused on Main Urban area and Main Towns. 2. Object to baseline only growth outside Main Urban Area and Main Towns. Other settlements should get a share. 3. 5 year land supply- there are deliverability issues. 4. Council consistently failed to demonstrate a 5 year land supply. 5. The settlement hierarchy is contributing to the shortfall. 6. Continuing this approach will lead to acceptance of more ‘windfall’ development. 7. Approach should be to reduce reliance on areas with previous deliverability issues. 8. Growth should be more evenly distributed across the Borough with higher levels of growth in Service Towns and villages. 9. Preventing Towns and villages from growing is unacceptable. 10. Proposed distribution does not comply with NPPF para.35 11. Object to the proposals in respect of the support of development for none allocated sites within settlement boundaries. Feels that is negatively worded and will restrict development. 12. Object to the exceptional circumstances being reliant on ‘community support’. Decisions should be made against adopted planning policy and material planning considerations and not influence or based on community support.
Response:
The spatial strategy has been developed through several rounds of consultation (Reg 18 stages) with summaries published along the way. Approaches to more dispersal/greater concentration/current Core Strategy approach etc were all options that were considered and subject to SA. A Settlement Background Paper was published alongside the Publication Plan (and previous 2018 consultation) setting out more details and will be updated and republished as a Topic Paper for Submission. There has been various competing calls throughout the process for different settlements to have a “bigger slice of the cake” but none of them are considered to amount to a more justified or coherent strategy than what has been proposed. The Council has always been able to demonstrate a 5-year housing land supply and has not lost any Appeals due to such matters so this is factually incorrect. The most recent Appeal (recovered by the Secretary of State) states that there is in excess of a 10 year housing land supply (see para 14 - APP/F4410/W/17/3169288) which supports the deliverability of sites in the borough. The role new housing plays in providing housing to meet local needs and maintain and support service provision is noted and forms part of the justification for the spatial strategy i.e. meeting local needs locally and is considered as being a ‘sound approach’. It is not considered the part f the policy referring to additional development on non-allocated sites is negatively worded and other policies (e.g. Policy 5/11) will apply which provide more detail depending on the proposal. If the policy is respect to community support is adopted throughout he Local Plan then it will form part of the development plan by which any application (where relevant) will be assessed.
2.4 The Council outline their proposed settlement hierarchy and level of distribution within the policy. It is noted that at least 50% of the baseline housing growth figure (8,775 homes) will be located within the 'Main Urban Area' of Doncaster, with 40% being delivered in the 'Main Towns' of Dunscroft, Dunsville, Hatfield & Stainforth, Thorne & Moorends, Conisbrough & Denaby, Mexborough, Armthorpe, Rossington, and Adwick & Woodlands. The remaining 10% of the housing requirement, which equates 877 over the entire plan period (just 44 dwellings per year) would be delivered across the 'Service Towns and Villages'. 2.5 As per our previous representations our Client objects to the distribution of housing through the settlement hierarchy; it is too heavily focused on both the Main Urban Area and the Main Towns, with 90% of the Council’s housing to be delivered in these areas. 2.6 In addition, our Client objects to the baseline housing growth figure (8,775 houses) being used when distributing housing. This figure ignores the planned economic growth over the plan period, which would result in an additional 327 homes per year. This would result in an additional 33 dwellings per year across settlements like Bawtry. 2.7 There are considered to be deliverability issues in Doncaster and some of the Main Towns and this is reflected by the fact that the Council have consistently failed to demonstrate a 5 year housing land supply, as demonstrated by planning appeal decisions. The proposed settlement hierarchy and distribution is very similar to the existing approach set out in the adopted Core Strategy, and it has to be questioned why the Council are taking such a similar approach, when it has led to issues previously and is perpetuating failure. 2.8 We have genuine concerns that by carrying the same approach through to the new Local Plan will again increase the risk of the Council not being able to deliver the required level of housing, as well as being unable to demonstrate a 5 year housing land supply. This will inevitably leave the Council susceptible to planning applications for windfall development. A sound approach would be to reduce the reliance in areas which have previously had deliverability issues. 2.9 Whilst it is accepted that the most sustainable settlements should generally accommodate higher levels of growth, the current distribution is unacceptable. Our Client suggests that growth should be more evenly distributed across the Authority, with higher levels of growth in the Service Towns and Villages. The Council have a duty to ensure that they deliver the level of housing set out within the Plan and it is important that housing is directed towards areas where it can be delivered and where people want to live. 2.10 Preventing towns and villages from growing is not acceptable. The provision of additional housing assists in ensuring the services and facilities in such places can remain in business through increasing investment. In several instances villages have aging populations and the provision of new housing can assist in providing opportunities for younger generations to get on the housing ladder in locations they want to live. This in turn helps to provide mixed communities, an element of sustainability which is often overlooked. 2.11 The proposed distribution is unsound as it fails to meet the tests outlined in paragraph 35 of the Revised National Planning Policy Framework. The approach is not effective or positively planned and should be revised to spread the distribution more evenly within the settlement hierarchy. 2.12 Our Client objects to the Council’s proposals in respect to the development of non-assigned sites within settlement boundaries in the Main Urban Areas, Main Towns, Service Towns and Villages and defined villages. As per previous Draft Policies, Policy 2 continues to state that development of non-assigned sites within development limits will be supported in appropriate locations, which are defined as sites that would “retain the core shape and form of the settlement; not significantly harm the settlement’s character and appearance; and not significantly harm the character and appearance of the surrounding countryside or the rural setting of the settlement”. 2.13 The Revised National Planning Policy Framework has a clear presumption in favour of development that falls within development limits and it is unacceptable and unreasonable to add a negatively worded policy which seeks to restrict development in such areas. The qualifying criteria for an ‘appropriate location’ are all matters that should be covered by separate policies, as such, this element of the policy should be deleted as it is unsound. 2.14 Policy 2 states that in exceptional circumstances, and subject to the demonstration of clear local community support, residential development in appropriate locations may also be supported in the Countryside on land adjacent to the development limit of a Defined Village. Our Client objects to this approach based on the fact that all planning applications should be considered against adopted planning policy and material planning considerations, not influenced or based on community support.

Summary:

Policy 2 - Spatial Strategy and Settlement Hierarchy 1. Object to distribution of housing through settlement hierarchy. Too focused on Main Urban area and Main Towns. 2. Objects to baseline only growth outside Main Urban Area and Main Towns. Other settlements should get a share. 3. 5 year land supply- there are deliverability issues. 4. Council consistently failed to demonstrate a 5 year land supply. 5. The settlement hierarchy is contributing to the shortfall. 6. Continuing this approach will lead to acceptance of more ‘windfall’ development. 7. Approach should be to reduce reliance on areas with previous deliverability issues. 8. Growth should be more evenly distributed across the Borough with higher levels of growth in Service Towns and villages. 9. Preventing Towns and villages from growing is unacceptable. 10. Proposed distribution does not comply with NPPF para.35 11. Objects to the proposals in respect of the support of development for none allocated sites within settlement boundaries. Feels that is negatively worded and will restrict development 12. Objects to the exceptional circumstances being reliant on ‘community support’. Decisions should be made against adopted planning policy and material planning considerations and not influence or based on community support.
Response:
The spatial strategy has been developed through several rounds of consultation (Reg 18 stages) with summaries published along the way. Approaches to more dispersal/greater concentration/current Core Strategy approach etc were all options that were considered and subject to SA. A Settlement Background Paper was published alongside the Publication Plan (and previous 2018 consultation) setting out more details and will be updated and republished as a Topic Paper for Submission. There has been various competing calls throughout the process for different settlements to have a “bigger slice of the cake” but none of them are considered to amount to a more justified or coherent strategy than what has been proposed. The Council has always been able to demonstrate a 5-year housing land supply and has not lost any Appeals due to such matters so this is factually incorrect. The most recent Appeal (recovered by the Secretary of State) states that there is in excess of a 10 year housing land supply (see para 14 - APP/F4410/W/17/3169288) which supports the deliverability of sites in the borough. The role new housing plays in providing housing to meet local needs and maintain and support service provision is noted and forms part of the justification for the spatial strategy i.e. meeting local needs locally and is considered as being a ‘sound approach’. It is not considered the part of the policy referring to additional development on non-allocated sites is negatively worded and other policies (e.g. Policy 5/11) will apply which provide more detail depending on the proposal. If the policy is respect to community support is adopted through the Local Plan then it will form part of the development plan by which any application (where relevant) will be assessed.

CUSREF: 04960
Name: Johnson Mowat
Date: 30/09/2019
Organisation: Johnson Mowat
Representing: Mr And Mrs S Hall

Comment Ref: C/Policy 2/04960/1/006

Attended Examination: Attend Hearing

Reason: To allow participation in discussions regarding the proposed housing requirement and distribution of development including site selection and allocations.

Area: Chapter 4: Strategic Approach

Policy: Policy 2: Spatial Strategy & Settlement Hierarchy

Tests of Soundness:
- Positively prepared
- Effective
- Justified
- Consistent with national

2.8 This policy contains a large amount of information, some of which should logically be included as supporting text rather than policy wording. The text should direct the reader to the background document/s that justify the percentage distribution of new homes (at least 50% to the Main Urban Area, about 40% to the Main Towns and around 10% to the Service Towns and Larger Villages). It is not clear whether the overall percentage distributions to the three settlement tiers have been influenced by seeking to minimise Green Belt, or whether it is based solely on the sustainability and size of settlements. The Topic Paper which will explain the Plans Settlement Strategy and Hierarchy is not available until Plan Submission, which does not give representors the opportunity of understanding or commenting on the strategy.

Response:
The strategy approach was explained in both the Settlement Background Paper in 2018 and the Housing Background Paper and Green Belt Topic Paper, both available for the 2019 consultation, and is now further covered in the Housing Topic Paper. The Council has gone to great lengths to explain the thought process for this and other matters.
Comment:

Overall, we support the focus of development in the most sustainable locations and within the Main Urban Areas and Main Towns of Doncaster. The emerging Local Plan designates Armthorpe as a Main Town, falling within the second tier of the settlement hierarchy and stating that the Main Towns will be the focus for substantial housing growth, supported by appropriate levels of employment, retail growth and wider service provision. As such, site 149 is located in a highly sustainable and suitable location to deliver further growth. Overall, we support the focus of development in the most sustainable locations and within the Main Towns of Doncaster. We do however, have fundamental concerns over DMBC’s draft strategic approach and its evidence base as referenced below.

Summary:

Policy 2 - We support focussing development in the most sustainable locations and within the Main Urban Area and Main Towns. Armthorpe is a Main Town and therefore site 149 is a located in a highly sustainable and suitable location for further growth. We have fundamental concerns over the Council’s draft strategic approach and its evidence base.

Response:

Noted. Support welcomed regarding development on the most sustainable locations.
4.1 This policy is considered unsound as it is not justified or effective. 4.2 The policy seeks to distribute the majority of new development to the most sustainable locations, these being the Main Urban Area of Doncaster, the 7 Main Towns and the 10 Service Towns and Villages. This general principal is considered appropriate and is supported. It is, however, important that this is sustainable and deliverable. 4.3 Bawtry is identified as in the 'Service Towns and Villages' category. The Local Plan identifies that this level of settlement will "provide a good range of services meeting their own needs and the local area. To maintain and enhance their role as service towns and 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 to meet their local needs, as well as renewing and regenerating any run-down neighbourhoods." 4.4 The identification of Bawtry within the Service Town and Village tier is supported. It is a high performing settlement and provides many primary services. It is well served by a district centre containing local services and amenities, including a primary school and health care provision. It also has excellent public transport connections to higher level centres such as Doncaster, Worksop, Retford and Gainsborough through regular bus services. Bawtry is, therefore, considered a sustainable settlement suitable for new growth. 4.5 In terms of new homes, the policy seeks to deliver at least 50% within the 'Main Urban Area' of Doncaster and 40% within the 7 'Main Towns' with just 10% allocated to the 'Service Towns and Villages'. The derivation of this split is discussed within the 'Sustainability Appraisal of the Doncaster Local Plan 2015-2035: Publication Version' (SA) and 'Settlement Background Paper'. The key criteria used is a 'proportional' split based upon population and the 'economic element' of the housing requirement uplift being split between the Main Urban Area and Main Towns (Settlement Background Paper para. 3.1.6 and 3.1.7). None of the economic uplift element is distributed to lower tier settlements. 4.6 The distribution takes no account of other factors such as affordable housing need, deliverability or development opportunities. The Council's viability evidence 'Whole Plan Viability Testing - Update, May 2019' (2019 Viability Report) identifies the challenges of delivering within many areas of the borough. The 2019 Viability Report identifies three 'value zones' across Doncaster, these being High, Medium and Low. The low value zones are generally concentrated in and around the Main Urban Area and Main Towns. 4.7 The 2019 Viability Report highlights that; "viability pressure was at its highest for schemes in low value areas. These schemes were shown to be unviable if a 20% (or higher) affordable housing provision was applied. However, some schemes did return a viable outcome if the affordable housing provision was reduced to 15%, although typically this also required a reduction in the other S106 policy contributions." (our emphasis, para. 7.5). 4.8 It is notable that Policy 8 of the Local Plan reduces affordable housing to 15% in the low value areas. However, based upon the output from the 2019 Viability Report it is likely that many schemes within these areas will remain unviable even with the reduced level of affordable housing. This threatens the deliverability of the plan and the ability to meet the affordable housing needs of the area. 4.9 The Council's background paper 'Housing Need Study / Affordable Housing Need' identifies a need for 209 affordable dwellings per annum. The viability report shows low value zones are generally around the Main Urban Area and Main Towns. It shows many areas earmarked for 15% affordable housing would remain unviable, even with the reduced level of housing. This threatens the deliverability of the plan and the ability to meet the affordable housing needs of the area. The need for 209 affordable housings per annum is 23% of the overall borough need, but 15% combined with the concentration of development in low value areas means that the affordable housing needs are unlikely to be met. 4.10 To ensure that the plan is deliverable and that it provides the greatest opportunity to deliver much needed affordable housing it is recommended that an increased percentage of housing be allocated to lower tier settlements. Given their inherent sustainability the majority of this redistribution should be within the Service Towns and Villages, such as Bawtry.
Response:

Policy 8 seeks to deliver affordable housing and provides for appropriate levels to high and low value areas. It is not considered reasonable to increase the housing requirement to provide higher levels of affordable housing. The standard methodology already makes allowances for affordability ratios and the Local Plan has already almost doubled this figure with the 920dpa requirement so will be delivering more affordable housing which will increase supply/competition and help to bring down affordability even further. Doncaster Council has ambitious plans to deliver more affordable homes, including more council housing, as part of a wider delivery programme. During 2019/20, the first developments will include a range of general needs and more bespoke accommodation. Sites will be funded through a combination of Housing Capital Programme funds; the use of One-for-One capital receipts from Right to Buy sales; and grant funding allocated from the Homes England Shared Ownership and Affordable Housing Programme (SOAHP) 2016/21 should the future bid be successful. Other initiatives and strategies, such as the Council’s Inclusive Growth Plan, are seeking to address issues such as skills and productivity/increasing wages etc which will also assist people in being able to afford/access housing.
3.1 This policy is considered unsound as it is not justified or effective. 3.2 The policy seeks to distribute the majority of new development to the most sustainable locations, these being the Main Urban Area of Doncaster, the 7 Main Towns and the 10 Service Towns and Villages. This general principle is considered appropriate and is supported. It is, however, important that this is sustainable and deliverable. 3.3 Carcroft & Skellow is identified as in the 'Service Towns and Villages' category. The Local Plan identifies that this level of settlement will "provide a good range of services meeting their own needs and the local area. To maintain and enhance their role as service towns and 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 to meet their local needs, as well as renewing and regenerating any run-down neighbourhoods."

3.4 The identification of Carcroft & Skellow within the Service Town and Village tier is supported. It is a high performing settlement and provides many primary services. It is well served by a district centre containing local services and amenities, including a primary school and health care provision. It also has excellent public transport connections to higher level centres such as Doncaster, Askern and Woodlands through regular bus services. Carcroft & Skellow is, therefore, considered a sustainable settlement suitable for new growth. 3.5 In terms of new homes the policy seeks to deliver at least 50% within the 'Main Urban Area' of Doncaster and 40% within the 7 'Main Towns' with just 10% allocated to the 'Service Towns and Villages'. The derivation of this split is discussed within the 'Sustainability Appraisal of the Doncaster Local Plan 2015-2035: Publication Version' (SA) and 'Settlement Background Paper'. The key criteria used is a 'proportional' split based upon population and the 'economic element' of the housing requirement uplift being split between the Main Urban Area and Main Towns (Settlement Background Paper para 3.1.6 and 3.1.7). None of the economic uplift element is distributed to lower tier settlements. 3.6 The distribution takes no account of other factors such as affordable housing need, deliverability or development opportunities. The Council's viability evidence 'Whole Plan Viability Testing - Update, May 2019' (2019 Viability Report) identifies the challenges of delivering within many areas of the borough. The 2019 Viability Report identifies three 'value zones' across Doncaster, these being High, Medium and Low. The low value zones are generally concentrated in and around the Main Urban Area and Main Towns. 3.8 The 2019 Viability Report highlights that; "viability pressure was at its highest for schemes in low value areas. These schemes were shown to be unviable if a 20% (or higher) affordable housing provision was applied. However, some schemes did return a viable outcome if the affordable housing provision was reduced to 15%, although typically this also required a reduction in the other S106 policy contributions." (our emphasis, para. 7.5). 3.9 It is notable that Policy 8 of the Local Plan reduces affordable housing to 15% in the low value areas. However, based upon the output from the 2019 Viability Report it is likely that many schemes within these areas will remain unviable even with the reduced level of affordable housing. This threatens the deliverability of the plan and the ability to meet the affordable housing needs of the area. 3.10 The Council’s background paper ‘Housing Need Study / Affordable Housing Need’ identifies a need for 209 affordable dwellings per annum. This represents almost 23% of the districts overall housing need. The reduction to 15% within areas of low value, combined with the concentration of development within these areas will ensure that the affordable housing needs of the area are unlikely to be met. 3.11 To ensure that the plan is deliverable and that it provides the greatest opportunity to deliver much needed affordable housing it is recommended that an increased percentage of housing be allocated to lower tier settlements. Given their inherent sustainability the majority of this re-distribution should be within the Service Towns and Villages, such as Carcroft & Skellow.

Summary:

Policy is considered unsound as it is not justified or effective. Distribution principle in general is supported and considered appropriate but it must be sustainable and deliverable. Carcroft - Skellow as a Service Town and Village is supported and it is sustainable and has a number of services. The housing distribution takes no account of factors such as affordable housing need, deliverability or development opportunities. The viability report shows low value zones are generally around the Main Urban Area and Main Towns. It shows many areas earmarked as affordable housing would remain unviable, even with the reduced level of housing. This threatens the deliverability of the plan and the ability to meet the affordable housing needs of the area. The need for 209 affordable housings per annum is 23% of the overall borough need, but 15% combined with the concentration of development in low value areas means that the affordable housing needs are unlikely to be met. To ensure the plan is deliverable and provides the greatest opportunity to deliver much needed affordable housing, an increased amount of housing should be allocated to the lower tier settlements. Given their inherent sustainability the majority of this re-distribution should be within the Service Towns and Villages, such as Carcroft & Skellow.
Response:

Policy 8 seeks to deliver affordable housing and provides for appropriate levels to high and low value areas. It is not considered reasonable to increase the housing requirement to provide higher levels of affordable housing. The standard methodology already makes allowances for affordability ratios and the Local Plan has already almost doubled this figure with the 920dpa requirement so will be delivering more affordable housing which will increase supply/competition and help to bring down affordability even further. Doncaster Council has ambitious plans to deliver more affordable homes, including more council housing, as part of a wider delivery programme. During 2019/20, the first developments will include a range of general needs and more bespoke accommodation. Sites will be funded through a combination of Housing Capital Programme funds; the use of One-for-One capital receipts from Right to Buy sales; and grant funding allocated from the Homes England Shared Ownership and Affordable Housing Programme (SOAHP) 2016/21 should the future bid be successful. Other initiatives and strategies, such as the Council’s Inclusive Growth Plan, are seeking to address issues such as skills and productivity/increasing wages etc which will also assist people in being able to afford/access housing.
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Summary:

Policy is considered unsound as it is not justified or effective. Distribution principle in general is supported and considered appropriate but it must be sustainable and deliverable. Carcroft - Skellow as a Service Town and Village is supported and it is sustainable and has a number of services. The housing distribution takes no account of factors such as affordable housing need, deliverability or development opportunities. The viability report shows low value zones are generally around the Main Urban Area and Main Towns. It shows many areas earmarked for 15% affordable housing would remain unviable, even with the reduced level of housing. This threatens the deliverability of the plan and the ability to meet the affordable housing needs of the area. The need for 209 affordable housings per annum is 23% of the overall borough need, but 15% combined with the concentration of development in low value areas means that the affordable housing needs are unlikely to be met. To ensure the plan is deliverable and provides the greatest opportunity to deliver much needed affordable housing, an increased amount of housing should be allocated to the lower tier settlements. Given their inherent sustainability the majority of this re-distribution should be within the Service Towns and Villages, such as Carcroft & Skellow.
Response:

Policy 8 seeks to deliver affordable housing and provides for appropriate levels to high and low value areas. It is not considered reasonable to increase the housing requirement to provide higher levels of affordable housing. The standard methodology already makes allowances for affordability ratios and the Local Plan has already almost doubled this figure with the 920dpa requirement so will be delivering more affordable housing which will increase supply/competition and help to bring down affordability even further. Doncaster Council has ambitious plans to deliver more affordable homes, including more council housing, as part of a wider delivery programme. During 2019/20, the first developments will include a range of general needs and more bespoke accommodation. Sites will be funded through a combination of Housing Capital Programme funds; the use of One-for-One capital receipts from Right to Buy sales; and grant funding allocated from the Homes England Shared Ownership and Affordable Housing Programme (SOAHP) 2016/21 should the future bid be successful. Other initiatives and strategies, such as the Council’s Inclusive Growth Plan, are seeking to address issues such as skills and productivity/increasing wages etc which will also assist people in being able to afford/access housing.
With regard to existing planning policy guidance, Branton is currently identified as a Larger Defined Village within the adopted Doncaster Core Strategy, which specifically states that: - Defined villages will be conserved and enhanced. Quality infill will be permitted. Existing village boundaries will be amended only if necessary to establish new defensible boundaries and, within the Green Belt, where there are exceptional circumstances. The Publication Draft Local Plan identifies in Policy 2 that the Council will focus on delivering sustainable growth, appropriate to the size of individual settlements, that meets the needs for new homes and jobs, regenerates places and communities, and supports necessary improvements to infrastructure, services and facilities. It further states that housing allocations and mixed-use allocations to meet local needs housing growth are distributed on a pro-rata basis to the most sustainable and deliverable urban and urban extension sites. The policy defines Branton as a "Defined Village" which are considered to have a "limited number of services and house commuters to destinations elsewhere. These villages do not have allocations for new development. Within their defined Development Limits, development proposals will be considered against other policies of the Plan as shown on the Policies Map". The policy further states that in exceptional circumstances, and subject to the demonstration of clear local community support, residential development in appropriate locations may also be supported in the Countryside on land adjacent to the development limit of a Defined Village. However, it will only be supported if it "does not exceed (a) the development size limit permissible for an individual scheme or site of the relevant Defined Village; and (b) does not exceed the cumulative growth limit over the Plan Period (as is defined in Policy 3) of the relevant Defined Village". "Appropriate locations" are identified in the policy as a location which does not conflict, when taken as a whole, with national policy or policies in the Local Plan. In addition, to qualify as an 'appropriate location', the site, if developed, would: - retain the core shape and form of the settlement; - not significantly harm the settlement's character and appearance; and - not significantly harm the character and appearance of the surrounding countryside or the rural setting of the settlement. Accordingly, at present no new housing allocations are proposed in Branton. Thus, severely restricting the ability to meet the housing needs of the Village. In accordance with the proposed distribution strategy, the Publication Draft Local Plan identifies a defined village cumulative growth limit of 70 homes over the plan period. To be brought forward in schemes no larger than 20 homes or 0.8 hectares in size. But only where strict planning policy criteria are met, including "exceptional circumstances". The Publication Draft Local Plan seeks to change the Village's designation in the settlement hierarchy from a Larger Village to a Defined Village. The sustainability credentials of the Village have not changed since the adoption of the Doncaster Core Strategy. The Village benefits from a primary school, a pub, a post office and a number of local businesses. The Village (and indeed the site) are located within 2km of the Main Urban Area of Doncaster, including The McAuley Catholic High School. 2km is of course the acceptable distance identified in Manual for Streets for walking and cycling. There are also employment opportunities on the Village's doorstep at the Yorkshire Wildlife Park. Finally, and importantly, the site is located within 3km of Doncaster Airport and the number of employment opportunities the facility and supporting businesses supply to the area. The Village has therefore become more sustainable as a location for housing development since the adoption of the Doncaster Core Strategy. Which is likely as a result of recent housing developments that have taken place in the Village. The enclosed Promotional Report provides a comparison of the services and facilities available for Branton, Sprotbrough, Barnby Dun, Auckley, Barnburgh, Harlington and Finningley. Each of these settlements are proposed to be defined as "Service Towns and Villages" within the emerging Local Plan. Accordingly, these settlements are proposed to receive new housing allocations. Whereas, Branton is not. (SEE EMAIL FOR Promotional Report) The conclusion of this comparison is that Branton can be considered to be as sustainable or more sustainable than Sprotbrough, Barnby Dun, Auckley, Barnburgh, Harlington and Finningley. This is due to the number of services and facilities located within the Village and its proximity to the Main Urban Area of Doncaster and Doncaster Airport. Branton is also the closest of the aforementioned Villages to the Main Urban Area of Doncaster. Furthermore, Policy 8 of the Draft Local Plan identifies a threshold of 15 dwellings or more associated with the delivery of affordable homes. If the Council maintained their current approach to the distribution of homes to Branton then it is highly likely that the Village will not receive any new affordable homes before 2035. At a potential affordable housing provision of 23%, a scheme at the identified "limit" of 20 homes in size would need to deliver 4.6 affordable homes. This would almost certainly result in developers bringing forward scheme of 15 dwellings in size, given the viability implications of delivering affordable homes. If development in the Village was left to current policy wording, then it is likely that the only opportunities to deliver new homes in the "Defined Villages" would be through small-scale windfall sites or rural exception sites. There is no evidence to back up the delivery of new affordable homes through other mechanisms, including rural exception sites. Which, if anything, would lead to a piecemeal release of land surrounding the Village. Which very few people would support. It is clear that the Council's current approach will not safeguard or enhance the vitality of Villages (as required by national planning guidance) nor will it satisfy the housing needs of the Village in the plan period up to 2035. The current approach will only result in the need for people to move away from the Village to seek a home to meet their housing needs. It will have the opposite impact that national planning guidance requires. These representations therefore strongly object to the Council's proposed distribution strategy. It is clear that there is substantial evidence to demonstrate Branton's sustainability credentials and its ability to cater for an appropriate level of new housing to meet market and affordable housing needs. Indeed, the Village is more sustainable now than it was when it was defined as a Larger Village in the Core Strategy. It also benefits from the same or more services and facilities than a number of other proposed "Service Towns & Villages". For the reasons identified above Branton should be defined as a "Service Town & Village" within the submission version of the Doncaster Local Plan and accordingly, our client's proposed development site at Doncaster Road, Branton should be included as a proposed housing allocation.
Summary:
Branton is currently identified as a Larger Defined Village within the adopted Doncaster Core Strategy and the Representation quotes Draft Local Plan Policy 2 and that no new allocations are proposed in Branton. Thus, severely restricting the ability to meet the housing needs of the Village. The Publication Draft Local Plan seeks to change the Village’s designation in the settlement hierarchy from a Larger Village to a Defined Village. The sustainability credentials of the Village have not changed since the adoption of the Doncaster Core Strategy. The Village has therefore become more sustainable as a location for housing development since the adoption of the Doncaster Core Strategy. Promotional Report provides a comparison of the services and facilities available for Branton, Sprotbrough, Barnby Dun, Auckley, Barnburgh, Harlington and Finningley. Each of these settlements are proposed to be defined as "Service Towns and Villages" within the emerging Local Plan. Accordingly, these settlements are proposed to receive new housing allocations. Whereas, Branton is not. The conclusion of this comparison is that Branton can be considered to be as sustainable or more sustainable than Sprotbrough, Barnby Dun, Auckley, Barnburgh, Harlington and Finningley. This is due to the number of services and facilities located within the Village and its proximity to the Main Urban Area of Doncaster and Doncaster Airport. Branton is also the closest of the aforementioned Villages to the Main Urban Area of Doncaster. Furthermore, Policy 8 identifies a threshold of 15 dwellings or more associated with the delivery of affordable homes. If the Council maintained their current approach to the distribution of homes to Branton then it is highly likely that the Village will not receive any new affordable homes before 2035. At a potential affordable housing provision of 23%, a scheme at the identified “limit” of 20 homes in size would need to deliver 4.6 affordable homes. This would almost certainly result in developers bringing forward scheme of 15 dwellings in size, given the viability implications of delivering affordable homes. If development in the Village was left to current policy wording, then it is likely that the only opportunities to deliver new homes in the "Defined Villages" would be through small-scale windfall sites or rural exception sites. There is no evidence to back up the delivery of new affordable homes through other mechanisms, including rural exception sites. Which, if anything, would lead to a piecemeal release of land surrounding the Village. Which very few people would support. Branton should be defined as a "Service Town & Village" within the submission version of the Doncaster Local Plan and accordingly, our client’s proposed development site at Doncaster Road, Branton should be included as a proposed housing allocation.

Response:
Branton is not considered as sustainable as any of the settlements mentioned, and this is backed up in the Settlement Audit, which has been updated in 2020 and reached the same conclusions. Policy 2 and 3 do set out that some development may come forward in countryside village locations subject to caveats, with Branton potentially receiving the largest amount of those set out - 70 dwellings. There are settlements closer to the airport that have housing allocations, and proximity to the Main Urban Area does not necessarily mean a settlement is sustainable in its own right when there is limited service provision within it and housing requirements for the urban area can be met in the urban area itself. Affordable housing would be a matter for any application, however the policies in the plan would facilitate this if appropriately sized sites are brought forward.
As the Publication Draft Local Plan still does not propose to deliver any new homes to Branton, as stated above, it is our view that the Council’s proposed approach would only result in the need for people to move away from the Village to seek a home to meet their housing needs. It would have the opposite impact that national planning guidance requires in respect of enhancing or maintaining the vitality of the Village. Accordingly, we have undertaken an independent assessment of the Village’s current and future housing needs in order to ascertain what is needed to ensure the sustainable growth of the settlement. The Housing Market Needs Assessment (HMNA) prepared by Huw Jones Consulting (July 2019) is enclosed and a summary of the key conclusions are provided here. (SEE EMAIL FOR The Housing Market Needs Assessment) The HMNA identifies that there is a justifiable need for new housing in the Branton area where there is a range of services (similar to those in currently defined ‘Larger Villages’) which would appear to make it a sustainable location for new housing development. The range of housing in Branton is currently limited and there is a preponderance of larger properties inhabited by an aging population. The current housing stock in the village is unlikely to be able to meet the demand for smaller homes arising from the requirements of starter households and downsizing older households, while the stock of larger housing with 3 bedrooms or more may not be enough to meet needs and aspirations as family housing needs change over time. This brings into question the future sustainability of the village. There are, however, no proposed allocated housing development sites listed in Branton, which leaves a highly constrained ability to meet newly arising housing need and demand either from within the village, or from households seeking to take up housing opportunities in the area. Based on current housing mix, demographic characteristics and housing market conditions and likely future trends, there is likely to be a need over a 15-year period for: - up to 133 new 2,3 and 4+ bedroom homes to meet the needs of existing residents as their needs and aspirations change. - up to 67 new 2,3 and 4+ bedroom homes to meet a potential demand from households seeking to move into the area from other parts of Doncaster, or from outside the district. The area is well located for people working at Doncaster Sheffield Airport and for households who may wish to live in the area and commute to Doncaster or Sheffield for work. Overall, it is estimated that up to 30% of new homes developed should have up to 2 bedrooms and should be aimed at ‘starter households (including first-time buyers) and older homeowners seeking to move to smaller housing. Up to 30% of new homes should have 3 bedrooms to meet a range of housing need and demand in the area including smaller households. There is likely to be pent up demand, either now or in the future, for larger properties from ‘second stagers’ (households with existing properties seeking to buy a larger home) and families with older children seeking a larger home. Building new homes with 3 bedrooms aimed at existing owners of 2-bedroom homes seeking a larger home would release 2-bedroom properties onto the market for starter households to buy at more affordable prices. In addition, smaller 3-bedroom homes may could better meet the needs and requirements of smaller starter households or older people downsizing by providing a smaller bedroom for potential use as a study, a ‘nursery’ or bedroom for a small child, or for visiting grandchildren, in addition to 2 ‘full size’ bedrooms. Up to 40% should have 4 bedrooms or more to provide opportunities for existing homeowners seeking to trade up to meet their needs and aspirations within the area itself rather than having to move elsewhere and would provide for demand from incoming families with existing equity from previous homes. The above average increase in prices of homes with 4 bedrooms or more suggests that supply is insufficient to meet demand for larger family homes in the area. There is clearly a need for additional affordable housing options in the area given the limited supply of affordable rented housing locally. - Despite house prices in Doncaster as a whole being lower than in some surrounding local authority areas, prices in the area containing Branton are higher than the average for Doncaster, bringing issues of affordability for households with modest or low incomes needing to live in the area either because of access to work (the two villages are very close to Doncaster Sheffield Airport) or a need to maintain family support. - It is important that new housing for sale is affordable and accessible to workers given the income distribution and employment patterns in the area, and the data above would suggest that new housing for sale at full market price should be at prices up to £200,000. Shared ownership might offer an option for lower income households to access home ownership. Help to Buy support attached to new build homes would ease access to home ownership in the area, although it may result in increased demand for larger homes. - Given the pressure on existing social housing stock, there is a need for new social housing to add to the capacity of existing stock to meet need. In addition, consideration should be given to intermediate housing options to meet need and demand, especially from households on low and very low incomes who may not have a priority need for social housing. There is a potential for encouraging partnerships between developers, funders and housing associations, (including co-housing organisations) to provide the rented housing needed. - New affordable housing provisions should be in line with current Doncaster policy requiring between 15% and 23% of new homes to be affordable. The HMNA concludes by stating that there is very strong evidence for new housing allocations to be identified in the Branton in the emerging Local Plan that can provide additional affordable housing options in the village and create a housing mix capable of sustaining the viability and vibrancy of the village into the future. Without additional new housing options in the village, it will be extremely difficult to attract new households, especially actual or potential families, to the village and remain in the village rather than have to move elsewhere to meet their housing needs, requirements and aspirations. There could also be difficulties in enabling older households needing to move to smaller properties in the village to do so, running the risk of further ‘sifting up’ the housing chain in the area and frustrating necessary movement within the village. This in turn could threaten the viability of local facilities and amenities. Our client’s Doncaster Road, Branton site represents a truly deliverable residential development site that can meet the identified local housing needs of Branton. Our development proposals for the site have been revised to take into account the conclusions of the independent Housing Market Needs Assessment work. The proposals seek to deliver a residential development of at least 100

Comment:

As the Publication Draft Local Plan still does not propose to deliver any new homes to Branton, as stated above, it is our view that the Council’s proposed approach would only result in the need for people to move away from the Village to seek a home to meet their housing needs. It would have the opposite impact that national planning guidance requires in respect of enhancing or maintaining the vitality of the Village. Accordingly, we have undertaken an independent assessment of the Village’s current and future housing needs in order to ascertain what is needed to ensure the sustainable growth of the settlement. The Housing Market Needs Assessment (HMNA) prepared by Huw Jones Consulting (July 2019) is enclosed and a summary of the key conclusions are provided here. 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There are, however, no proposed allocated housing development sites listed in Branton, which leaves a highly constrained ability to meet newly arising housing need and demand either from within the village, or from households seeking to take up housing opportunities in the area. Based on current housing mix, demographic characteristics and housing market conditions and likely future trends, there is likely to be a need over a 15-year period for: - up to 133 new 2,3 and 4+ bedroom homes to meet the needs of existing residents as their needs and aspirations change. - up to 67 new 2,3 and 4+ bedroom homes to meet a potential demand from households seeking to move into the area from other parts of Doncaster, or from outside the district. The area is well located for people working at Doncaster Sheffield Airport and for households who may wish to live in the area and commute to Doncaster or Sheffield for work. 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Help to Buy support attached to new build homes would ease access to home ownership in the area, although it may result in increased demand for larger homes. - Given the pressure on existing social housing stock, there is a need for new social housing to add to the capacity of existing stock to meet need. In addition, consideration should be given to intermediate housing options to meet need and demand, especially from households on low and very low incomes who may not have a priority need for social housing. There is a potential for encouraging partnerships between developers, funders and housing associations, (including co-housing organisations) to provide the rented housing needed. - New affordable housing provisions should be in line with current Doncaster policy requiring between 15% and 23% of new homes to be affordable. The HMNA concludes by stating that there is very strong evidence for new housing allocations to be identified in the Branton in the emerging Local Plan that can provide additional affordable housing options in the village and create a housing mix capable of sustaining the viability and vibrancy of the village into the future. Without additional new housing options in the village, it will be extremely difficult to attract new households, especially actual or potential families, to the village and remain in the village rather than have to move elsewhere to meet their housing needs, requirements and aspirations. There could also be difficulties in enabling older households needing to move to smaller properties in the village to do so, running the risk of further ‘sifting up’ the housing chain in the area and frustrating necessary movement within the village. This in turn could threaten the viability of local facilities and amenities. Our client’s Doncaster Road, Branton site represents a truly deliverable residential development site that can meet the identified local housing needs of Branton. Our development proposals for the site have been revised to take into account the conclusions of the independent Housing Market Needs Assessment work. The proposals seek to deliver a residential development of at least 100
new homes, alongside a number of community benefits. More specifically the development proposals will deliver: - 30% 2 Bedroom Homes - 30% 3 Bedroom Homes - 40% 4+ Bedroom Homes - A total of 23% Affordable Homes across the site. If the Council's approach remains unchanged then the housing needs of the Village will not be met before 2035. Resulting in a negative impact on the vitality of the Village, including its services and facilities, contrary to the guidance presented in Paragraph 78 of the NPPF.

Summary:
No allocations to Branton will result in people having to move away from the village to meet their housing needs which will not enhance or maintain the vitality of the village and is contrary to national guidance. Undertaken an independent assessment of the Village's current and future housing needs in order to ascertain what is needed to ensure the sustainable growth of the settlement. The Housing Market Needs Assessment (Huw Jones Consulting - July 2019) is enclosed and a summary of the key conclusions are provided here. The HMNA identifies that there is a justifiable need for new housing in the Branton area where there is a range of services (similar to those in currently defined 'Larger Villages') which would appear to make it a sustainable location for new housing development. The range of housing in Branton is currently limited and there is a preponderance of larger properties inhabited by an aging population. The current housing stock in the village is unlikely to be able to meet the demand for smaller homes arising from the requirements of starter households and downsizing older households, while the stock of larger housing with 3 bedrooms or more may not be enough to meet needs and aspirations as family housing needs change over time. This brings into question the future sustainability of the village. There are, however, no proposed allocated housing development sites listed in Branton, which leaves a highly constrained ability to meet newly arising housing need and demand either from within the village, or from households seeking to take up housing opportunities in the area. Without additional new housing options in the village, it will be extremely difficult to attract new households, especially actual or potential families, to the village and remain in the village rather than have to move elsewhere to meet their housing needs, requirements and aspirations. There could also be difficulties in enabling older households needing to move to smaller properties in the village to do so, running the risk of further 'silting up' the housing chain in the area and frustrating necessary movement within the village. This in turn could threaten the viability of local facilities and amenities. Our client's Doncaster Road, Branton site represents a truly deliverable residential development site that can meet the identified local housing needs of Branton. Our development proposals for the site have been revised to take into account the conclusions of the independent Housing Market Needs Assessment work. The proposals seek to deliver a residential development of at least 100 new homes, alongside a number of community benefits. More specifically the development proposals will deliver: - 30% 2 Bedroom Homes - 30% 3 Bedroom Homes - 40% 4+ Bedroom Homes - A total of 23% Affordable Homes across the site. If the Council’s approach remains unchanged then the housing needs of the Village will not be met before 2035. Resulting in a negative impact on the vitality of the Village, including its services and facilities, contrary to the guidance presented in Paragraph 78 of the NPPF.

Response:
The Representations' Housing Market Needs Assessment is noted. As set out in the response, Branton is proposed as a Defined Village so has not received any subsequent allocations. Policy 3 does however identify Branton (being one of the Larger Defined Villages adjacent to the Countryside so not Green Belt) as having scope for schemes of up to 20 dwellings (0.8ha) to a cumulative growth limit of 70 dwellings which is the highest of the Defined Villages totals. The policy, alongside infilling within current development limits provides opportunity for new housing, including the housing needed to meet local needs. National policy also allows for entry level exception sites to such locations in the Borough.
4.1. Framecourt Homes is concerned that the Doncaster Local Plan 2015-2035 Publication Version is deficient in its content and evidence base and does not reflect national guidance. Test of Soundness 4.2. Framecourt Homes considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 4.3. Framecourt Homes is concerned with the Spatial Strategy and distribution. Framecourt Homes would expect the spatial strategy and distribution to provide an appropriate development pattern and support economic growth and sustainable development within all market areas. 4.4. The Strategy at present focusses growth towards Doncaster, followed by the Main Towns and then a smaller element in the Service Towns and Larger Villages and then no development in other defined villages. Therefore no new housing is proposed in the rural economy in settlements which are relatively sustainable. This approach is broadly consistent with the approach set out in the UDP and subsequent core strategy. Framecourt Homes are concerned that this risks focusing development in less viable areas and risks undermining the delivery of the Plan 4.5. The implementation of the Spatial Strategy will be discussed in response to Policy 6 and the proposed allocations. 4.6. Doncaster is an integral part of the Sheffield City Region and the ambitious growth aspirations. The Strategic Economic Plan sets out the Sheffield City Region’s plans to transform the local economy over the next decade. At the heart of the plan is the creation of 70,000 new private sector jobs and 6,000 new businesses. 4.7. Therefore, to achieve the aspired growth that the City Region is seeking to achieve and is securing Government funding for the level of new housing needs to reflect the ambitions of the Strategic Economic Plan. 4.8. Furthermore, the Sheffield City Region Integrated Infrastructure Plan states: A quality housing offer has a crucial role to play in the future economic growth of the City Region. It is essential to attracting and retaining a skills base that supports inward investment as we as meeting existing and future community needs and retention of Sheffield City Region (SCR) talent. It has been identified that between 70,000 and 100,000 additional homes are needed in SCR to support the proposed economic growth over the next 10 years. These will have the dual benefit of providing accommodation that underpins the proposed increase in employment (70,000 jobs), as well as the wider economic benefits that housing investment brings. Housing forms a key component of the SCR construction sector. The CBI [CBI (2012) Bridging the Gap - Backing the Construction Sector to Create Jobs] estimates that every #1 spent on construction projects yields a total of #2.84 expenditure in the wider economy. It is estimated that approximately #2,000 per annum per household spending on local convenience goods, and approximately #2,700 per annum per household spending on local comparison goods can be attributed to residents in new housing. (Over the lifetime of the SEP, a similar amount would generate at least #400 million for the SCR economy). The GVA benefits that can be attributable to new housing are as follows: - Construction: material, labour professional skills and other services for construction, compounded by supply chain benefits - Household Maintenance Spend: Spend on products and services associated with each new household - Direct Job Uptake: GVA resulting from new productive workers moving into SCR, compounded by their spend on SCR products and services - Indirect (Chain) Benefits: As SCR residents move up the housing chain, this creates new available space in different sub-markets. - Preventing Displacement: The type and location of construction may be important in mitigating losses of households from the city region that might otherwise occur. 4.9. Within this context it is important that the Council plans for new jobs and associated new homes in accordance with the Strategic Economic Plan growth aspirations. 4.10. To achieve this approach, Framecourt Homes consider the Local Plan should: - Focus the majority of development upon Doncaster Main Urban Area but review the likely housing yield from existing sites with planning permission and proposed allocations to ensure that they can all be delivered within the Plan Period. This is explained further in response to Policy 3. - To focus growth and regeneration on the Main Towns of appropriate scale for their needs and the economic growth aspirations of the Borough. Rossington should be an area of growth given the provision of new infrastructure, its location near to Doncaster Airport, and the scale of economic growth planned at IPort. Thorne and Moorends should grow to reflect its location on the logistics and employment parks, and level of facilities available within the designated town and local centres. Within that context Carcroft and Skellow is of similar scale to the Main Towns and should be identified as such, particularly with its provision of employment parks and location on the A1(M) and focus on regeneration and growth. - Provision should be made in the Service Towns and Larger Villages to reflect their scale and function. These are sustainable towns and villages which serve a hinterland. - Defined Villages are sustainable villages serving a rural economy and should accommodate a level of development appropriate to their scale and function in line with the provisions Framework (paragraph 78). 4.11. Framecourt Homes consider that the above approach meets the Local Plan vision and objectives identified within the Local Plan but is also one that is more aligned with the principles of sustainable development. 4.12. Policy 2 establishes the strategic approach to the Green Belt within Doncaster and states that the general extent of the Green Belt will be retained. Framecourt Homes is concerned that Green Belt boundaries have been drawn tightly around settlements and proposed allocations and as such does not have regard to the intended permanence in the long term so that the boundaries can endure beyond the Plan period. Policy 3 and 6 do not identify any safeguarded land. The Plan does identify reserve sites. However these sites have significant technical constraints. Framecourt Homes do not consider that they are suitable pool of sites due to the significant constraints and object to their identification in the Plan. 4.13. Whilst there is no definitive guidance indicating the amount of land which should be safeguarded the Framework (2019) is clear that where necessary Local Plans should 'identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period', and that local authorities should ‘be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period’. Given that the council considers that the majority of sites will be delivered within the plan period. It is highly likely that further alterations...
to the green belt will be required at the next review of the Plan. This is not consistent with the provisions of the Framework. 4.14. Framecourt Homes consider that Policy 2 should establish the approach to Safeguarding land and that safeguarded land should be identified, not only provide a robust long-term Green Belt boundary but will also provide certainty for residents and developers alike in terms of likely growth locations beyond the end of the plan period. Framecourt Homes therefore suggest that such land be allocated in the Plan across the spatial hierarchy, including smaller settlements per the earlier spatial approach. 4.15. Framecourt homes consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 4.16. However, Framecourt Homes consider that with the proposed changes to the strategy and establishing the approach to safeguarding land the Local Plan can be found sound. Framecourt Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 4.17. To overcome the objection and address soundness matters, the Council should: - Reflect economic and housing growth aspirations - Amend the Spatial Strategy as indicated - Identify safeguarded land or suitable Reserve Development Sites across the spatial hierarchy

Summary:
Concerned with the spatial strategy and distribution. Would expect this to provide appropriate development pattern and support economic growth and sustainable development within all market areas. Concern that development is focussed in less viable areas and this risks undermining the delivery of the plan. The plan needs to deliver the growth aspired to by the SCR in the Strategic Economic Plan and the quality housing aspired to in the Integrated Infrastructure Plan. 70k - 100k new houses are needed in the SCR to support the proposed economic growth over the next 10 years. This provides accommodation to underpin the employment growth as well as wider economic benefits that housing investment brings. The GVA benefits that can be attributed to new housing are as follows: - Construction: material, labour professional skills and other services for construction, compounded by supply chain benefits - Household Maintenance Spend: Spend on products and services associated with each new household - Direct Job Uptake: GVA resulting from new productive workers moving into SCR, compounded by their spend on SCR products and services - Indirect (Chain) Benefits): As SCR residents move up the housing chain, this creates new available space in different sub-markets. - Preventing Displacement: The type and location of construction may be important in mitigating losses of households from the city region that might otherwise occur. To achieve the growth in line with the Strategic Economic Plan growth aspirations, the Plan should: - Focus development in the Main Urban Area, but review yields from sites with permission and allocations so they can all be delivered in the plan period; - Focus Main Town growth and regeneration in a manner appropriate to their needs and borough growth aspirations. Rossington should be an area of growth due to the airport and iPort and associated infrastructure; Thorne and Moorends should grow to reflect its location, regeneration ambitions and connectivity to logistics parks and as having a local centre. Carcroft Skellow is similar in scale to the Main Towns and should be identified as such as it is close to the A1(M) and has a focus on regeneration and growth. - Service Town and Village provision should reflect their scale and function as sustainable locations servicing a hinterland. - Defined villages are sustainable villages servicing a rural economy and should accommodate development appropriate to their scale and function in line with NPPF para. 78. This would meet the Local Plan vision and objectives and is more aligned with sustainable development. Also concerned Green Belt boundaries are too tightly drawn and give little regard to intended permanency in the long term for boundaries to endure. There is no safeguarded land. The reserve sites have significant technical constraints and are not a suitable pool, therefore their inclusion is objected to. The framework is clear safeguarded land should be identified. It is suggested this should be identified across the hierarchy including smaller settlements as per the spatial approach. The policy is not justified or consistent with the framework and the plan could fail to deliver sustainable development in accordance with the framework. It is not sound. To overcome soundness issues, the following proposed changes are proposed: - Reflect economic and housing growth aspirations - Amend the Spatial Strategy as indicated - Identify safeguarded land or suitable Reserve Development Sites across the spatial hierarchy

Response:
The approach to the distribution of housing is explained in the Housing Topic Paper. The approach allocates housing to the most sustainable locations, including economic growth to the more sustainable Main Urban Area and Main Towns, but does provide opportunities for some limited development in smaller localities to support these rural areas. The approach to Green Belt, including the decision not to safeguard land, is discussed in the Green Belt Topic Paper. NPPF states boundaries should be clearly defined and not include land which is unnecessary to keep permanently open and that boundaries should be drawn using readily recognisable features. Reserve development sites are sites which do not count towards any housing calculations, but are sites where housing could be located if the technical constraints can be overcome.
**Comment Ref:** /Policy 2/05187/1/001  
**Representing:** R Crowe, G Platts, J Lodge, S Hanson, MA & JM Youdan

**Policy:** Policy 2: Spatial Strategy & Settlement Hierarchy

**Tests of Soundness:**  
- Positively prepared  
- Effective  
- Legally Compliant

**Comment:**

Objection is made to the policy as drafted on the basis that the text indicates that the split of new development will be 50% of new homes to Doncaster urban, 40% to main towns and 10% to the service towns and villages. Of these proportions only local needs housing is distributed on a pro rata basis, and the economic led housing growth is distributed only to Doncaster Urban and the Main towns. None of this part of the housing growth is allocated to the service towns and villages and there is no cogent explanation of why these sustainable settlements should not have a proportionate share of this part of the proposed housing growth. The strategy as drafted in this Policy therefore does not reflect the sustainability and potential of the service towns and villages to meet a share of the economic led housing growth. Part 3 of the Policy sets out the role of the service towns and villages, and indicates that these settlements will be a focus for a level of growth to meet their “local needs” as well as regenerating run down areas. There is no explanation of what is meant by local needs in this part of the policy, but it can only be assumed that this is the local needs housing element of the overall requirement minus the economic growth housing. This is a false distinction in terms of land allocation in these settlements which should receive a proportionate share of economic growth housing as set out above. Within these service towns and villages, growth within the development boundaries is considered favourably. The Policy also makes provision for other new development on sites adjacent/outside the development boundary in certain circumstances; which include the situation where the Planning Authority cannot demonstrate a five year land supply. The Plan does not identify any locations where this could take place and does not make clear what the role of the other reserve sites are in this context. It is not considered that the current reserved sites represent the best options for future land release. Policy 2 sets out that development limits have been defined around the settlements of the hierarchy. The site at Barnby Dun is shown as outside the development boundary of Barnby Dun. The development Boundary should be amended to include this extension land within the defined development boundary of the settlement as it will form an integral part of the settlement.

**Summary:**

Objects to policy and distribution of development with only local needs being directed to Service Towns/Villages; these are sustainable settlements so should also receive a share of the economic growth-led housing and there is no explanation for this. The strategy does not reflect the sustainability potential of these settlements therefore. The policy allows development adjacent/outside of settlement limits in certain circumstances but does not identify any locations where this could take place and does not make clear what the role of reserve sites are in this context. It is not considered the current reserve sites are the best options for future land release. Development limits should be drawn to include housing allocation at Barnby Dun (Ref 147).

**Response:**

The spatial strategy has been developed through several rounds of consultation (Reg 18 stages) with summaries published along the way. One of the strong messages that came out of the issues Options stage and Homes Settlements consultation was support for meeting local housing needs locally which has resulted in a more dispersed settlement hierarchy, which introduces a greater number of settlements suitable for allocations (larger service villages) compared to the Core Strategy in the first instance. However, the economic-growth led housing component is more footloose and has been directed to the higher tier settlements which reflects their stronger sustainability credentials. The approach has also allowed a sequential approach to avoidance of flood risk at spatial strategy level so that the strategy (and then subsequent sites) have both been identified in line with national policy’s requirement to avoid flood risk where possible. Approaches to more dispersal/greater concentration/current Core Strategy approach etc were all options that were considered and subject to SA. A Settlement Background Paper was published alongside the Publication Plan (and previous 2018 consultation) setting out more details and will be updated and republished as a Topic Paper for Submission. Part 5 of the policy provides flexibility to bring forward additional development outside of allocations in the east of the borough and is a criteria based policy that could be used at any of the settlements with Countryside (but not Green Belt) boundaries. Reserve Sites are the subject of Policy 6 (and identified in Chapter 16 and on the Policies Map) and are a separate source of potential housing supply unrelated to Part 5 of this policy and are not necessary in terms of meeting the housing requirement. The Development Limits methodology was subject to previous consultation (2018) and re-published alongside the Publication version of the plan. It has always proposed that greenfield urban extension allocations should be excluded from development limits, but would be incorporated when the permission/development has been implemented through a future review of the plan. This is a logical approach, especially so for larger allocations where development will include not just housing but other non-urban uses which may still remain outside of development limits depending on final layouts e.g. landscaping, public open space, balancing ponds etc.
Comment:
Objection is made to the green belt boundary as drafted. The Boundary is drawn tightly around Manor Farm and fails to include the existing farm buildings on the western side and access into the site. The Boundary as drafted is therefore illogical and should be amended to include within the development limits the entirety of the Manor Farm complex. This would allow the redevelopment of these buildings to form an attractive entrance to the village and an enhancement to the Conservation Area. See below. (SEE EMAIL FOR Plan) PROPOSED CHANGE: The plan should be modified to - Amend the green belt boundary to omit Manor Farm from the green belt

Summary:
Objection is made to the Green Belt boundary which is drawn tightly around Manor Farm, Braithwell, and fails to include the existing farm buildings on the western side and access into the site. The boundary as drafted is therefore illogical and should be amended to include within the development limits the entirety of the Manor Farm complex. This would allow the redevelopment of these buildings to form an attractive entrance to the village and an enhancement to the Conservation Area. Plan shown in email attachment.

Response:
It is not considered that there are exceptional circumstances identified to justify changes to the Green Belt boundary. National policy allows for redevelopment and extension/alteration to existing buildings in the Green Belt subject to certain conditions.
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 Thorne as a 'second tier' Main Town is supported, as is the strategy of focussing new development to these towns and key transport corridors.

**Summary:**
Policy 2 is welcomed and aligns with the settlement hierarchy and the presumption in favour of sustainable development. The inclusion of Thorne as a 'second tier' Main Town is supported, as is the strategy of focussing new development to these towns and key transport corridors.

**Response:**
Noted. Support welcomed.
Policy 2 indicates that decisions on the location and scale of development should be informed by Doncaster’s Settlement Hierarchy and in accordance with Policy 3. Policy 2 states that Main Towns such as Rossington should be maintained and enhanced and should be the focus for substantial housing growth supported by appropriate levels of employment and retail growth. TVI support the identification of Rossington as a Main Town and as an appropriate location for housing and employment growth. We therefore find emerging Policy 2 to be sound.

Summary:
This section provides a summary of policy 2. TVI support the identification of Rossington as a Main Town and as an appropriate location for housing and employment growth. Policy 2 is sound.

Response:
Noted. Support welcomed.
4.1. Avant Homes is concerned that the Doncaster Local Plan 2015-2035 Publication Version is deficient in its content and evidence base and does not reflect national guidance. Test of Soundness 4.2. Avant Homes considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 4.3. Avant Homes is concerned with the Spatial Strategy and distribution. Avant Homes would expect the spatial strategy and distribution to provide an appropriate development pattern and support economic growth and sustainable development within all market areas. 4.4. The Strategy at present focusses growth towards Doncaster, followed by the Main Towns and then a smaller element in the Service Towns and Larger Villages and then no development in other defined villages. Therefore no new housing is proposed in the rural economy in settlements which are relatively sustainable. This approach is broadly consistent with the strategy set out in the UDP and subsequent Core Strategy. Avant Homes are concerned that this risks focusing development in less viable areas and risks undermining the delivery of the Plan. 4.5. The implementation of the Spatial Strategy will be discussed in response to Policy 6 and the proposed allocations: 4.6. Doncaster is an integral part of the Sheffield City Region and the ambitious growth aspirations. The Strategic Economic Plan sets out the Sheffield City Region’s plans to transform the local economy over the next decade. At the heart of the plan is the creation of 70,000 new private sector jobs and 6,000 new businesses. 4.7. Therefore, to achieve the aspired growth that the City Region is seeking to achieve and is securing Government funding for the level of new housing needs to reflect the ambitions of the Strategic Economic Plan. 4.8. Furthermore, the Sheffield City Region Integrated Infrastructure Plan states: A quality housing offer has a crucial role to play in the future economic growth of the City Region. It is essential to attracting and retaining a skills base that supports inward investment as we as meeting existing and future community needs and retention of Sheffield City Region (SCR) talent. It has been identified that between 70,000 and 100,000 additional homes are needed in SCR to support the proposed economic growth over the next 10 years. These will have the dual benefit of providing accommodation that underpins the proposed increase in employment (70,000 jobs), as well as the wider economic benefits that housing investment brings. Housing forms a key component of the SCR construction sector. The CBI [CBI (2012) Bridging the Gap - Backing the Construction Sector to Create Jobs] estimates that every £1 spent on construction projects yields a total of £2.84 expenditure in the wider economy. It is estimated that approximately £2,000 per annum per household spending on local convenience goods, and approximately £2,700 per annum per household spending on local comparison goods can be attributed to residents in new housing. (Over the lifetime of the SEP, a similar amount would generate at least £400 million for the SCR economy). The GVA benefits that can be attributable to new housing are as follows: - Construction: material, labour professional skills and other services for construction, compounded by supply chain benefits - Household Maintenance Spend: Spend on products and services associated with each new household - Direct Job Uptake: GVA resulting from new productive workers moving into SCR, compounded by their spend on SCR products and services - Indirect (Chain) Benefits: As SCR residents move up the housing chain, this creates new available space in different sub-markets. - Preventing Displacement: The type and location of construction may be important in mitigating losses of households from the city region that might otherwise occur. 4.9. Within this context it is important that the Council plans for new jobs and associated new homes in accordance with the Strategic Economic Plan growth aspirations. 4.10. To achieve this approach, Avant Homes consider the Local Plan should: - Focus the majority of development upon Doncaster Main Urban Area but review the likely housing yield from existing sites with planning permission and proposed allocations to ensure that they can all be delivered within the Plan Period. This is explained further in response to Policy 3. - To focus growth and regeneration on the Main Towns of appropriate scale for their needs and the economic growth aspirations of the Borough. Rossington should be an area of growth given the provision of new infrastructure, its location near to Doncaster Airport, and the scale of economic growth planned at iPort. Thorne and Moorsend should grow to reflect its location, regeneration ambitions connected with the logistics and employment parks, and level of facilities available within the designated town and local centres. Within that context Carcroft and Skellow is of similar scale to the Main Towns and should be identified as such, particularly with its provision of employment parks and location on the A1(M) and focus on regeneration and growth. - Provision should be made in the Service Towns and Larger Villages to reflect their scale and function. These are sustainable towns and villages which serve a hinterland. Wadworth is of a similar scale and function of these settlements and should therefore be defined as such, with appropriate allocations made, recognising its proximity and connectivity to the Main Urban Area. - Defined Villages are sustainable villages serving a rural economy and should accommodate a level of development appropriate to their scale and function in line with the provisions Framework (paragraph 78). Avant note that Barnsley Metropolitan Borough Council sought to take a similar approach and did not identify allocations within the villages. The Inspector considered that the Plan was not positively prepared in relation to the approach to the villages and considered that policy LG2 was unsound. In this case the local authority reviewed the settlements and identified additional sites within the villages to accommodate new development. 4.11. Avant Homes consider that the above approach meets the Local Plan vision and objectives identified within the Local Plan but is also one that is more aligned with the principles of sustainable development. 4.12. Policy 2 establishes the strategic approach to the Green Belt within Doncaster and states that the general extent of the Green Belt will be retained. Avant Homes is concerned that Green Belt boundaries have been drawn tightly around settlements and proposed allocations and as such does not have regard to the intended permanence in the long term so that the boundaries can endure beyond the Plan period. Policy 3 and 6 do not identify any safeguarded land. The Plan does identify reserve sites. However these sites have significant technical constraints. Avant Homes do not consider that they are suitable pool of sites due to the significant constraints and object to their identification in the Plan. 4.13. Whilst there is no...
definitive guidance indicating the amount of land which should be safeguarded the Framework (2019) is clear that where necessary Local Plans should ‘identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period’, and that local authorities should ‘be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period’. Given that the council considers that the majority of sites will be delivered within the plan period. It is highly likely that further alterations to the green belt will be required at the next review of the Plan. This is not consistent with the provisions of the Framework. 4.14. Avant Homes consider that Policy 2 should establish the approach to Safeguarding land and that safeguarded land should be identified, not only provide a robust long-term Green Belt boundary but will also provide certainty for residents and developers alike in terms of likely growth locations beyond the end of the plan period. Avant Homes therefore suggest that such land be allocated in the Plan across the spatial hierarchy, including smaller settlements per the earlier spatial approach. 4.15. Avant Homes consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 4.16. However, Avant Homes consider that with the proposed changes to the strategy and establishing the approach to safeguarding land the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 4.17. To overcome the objection and address soundness matters, the Council should: - Reflect economic and housing growth aspirations - Amend the Spatial Strategy as indicated - Identify safeguarded land or suitable Reserve Development Sites across the spatial hierarchy

Summary:
Concerned about the spatial strategy and distribution - would expect it to provide an appropriate development pattern and support economic growth and sustainable development in all market areas. No housing is proposed in the rural economy in settlements which are relatively sustainable. The approach is broadly consistent with the UDP and Core Strategy. Concern that the focus on less viable areas risks undermining plan delivery. Level of new housing needs to reflect the ambitions of the SCR strategic economic plan. Housing and construction bring money into the wider economy. The GVA benefits that can be attributable to new housing include: - Construction: material, labour professional skills and other services for construction, compounded by supply chain benefits - Household Maintenance Spend: Spend on products and services associated with each new household - Direct Job Uptake: GVA resulting from new productive workers moving into SCR, compounded by their spend on SCR products and services - Indirect (Chain) Benefits: As SCR residents move up the housing chain, this creates new available space in different sub-markets. - Preventing Displacement: The type and location of construction may be important in mitigating losses of households from the city region that might otherwise occur. It is important that the Council plans for new jobs and associated new homes in accordance with the Strategic Economic Plan growth aspirations. Therefore, the Local Plan should: - Focus development on the urban area but review the likely yield from existing sites with permission and proposed allocations to ensure they can all be delivered in the plan period. - To ensure Main Town growth is of an appropriate scale for their needs and the boroughs economic growth aspirations. Rossington should be an area of growth given new infrastructure there and it’s location close to the airport, and iport. Thorne and Moorsend should also grow to reflect its location, regeneration ambitions connected to employment parks and level of facilities locally available. Carcroft - Skellow should also be identified as a Main Town given it's location close to employment parks and close to the A1(M) - Provision should be made in Service Towns and Villages to reflect their scale and function as sustainable locations which serve a hinterland. Wadworth should be defined as such as it is of a similar scale and function with appropriate allocations made recognising its proximity and connectivity to the urban area. - Defined villages are sustainable and serve a rural economy and should accommodate a level of development appropriate to their scale and function in line with para. 78 of the NPPF. Barnsley took a similar approach in not identifying village allocations (LG2) and the inspector found it unsound, leading to Barnsley reviving settlements and finding additional sites. The above approach would better align with the vision and objectives of the plan, as well as being better aligned with the principles of sustainable development. Concern that Green Belt boundaries have been tightly drawn around settlements and allocations and thus has no regard for permanence in the long term so boundaries endure. No safeguarded land is identified. Reserve sites have significant technical constraints to them. They are not a suitable pool due to the constraints and they are objected to their inclusion. It is highly likely given that most sites will be completed in the plan period that Green Belt will be required after it. Not safeguarding the land is therefore inconsistent with the NPPF which says boundaries should endure beyond the plan period. Safeguarded land should be identified and established in Policy 2 to provide certainty to developers and residents in terms of likely growth locations beyond the plan period. Land should be allocated across the hierarchy, including to smaller settlements as per the suggested spatial approach. The current policy is unjustified and not consistent with the framework, and the plan could fail to deliver sustainable development in accordance with the framework. As such, the plan is not considered sound. Proposed change: To overcome the objection and address soundness matters, the Council should: - Reflect economic and housing growth aspirations - Amend the Spatial Strategy as indicated - Identify safeguarded land or suitable Reserve Development Sites across the spatial hierarchy

Response:
The approach to the distribution of housing is explained in the Housing Topic Paper. The approach allocates housing to the most sustainable locations, including economic growth to the more sustainable Main Urban Area and Main Towns, but does provide opportunities for some limited development in smaller localities to support these rural areas. The approach to Green Belt, including the decision not to safeguard land, is discussed in the Green Belt Topic Paper. NPPF states boundaries should be clearly defined and not include land which is unnecessary to keep permanently open and that boundaries should be drawn using readily recognisable features. Reserve development sites are sites which do not count towards any housing calculations, but are sites where housing could be located if the technical constraints can be overcome.
4.1. Avant Homes is concerned that the Doncaster Local Plan 2015-2035 Publication Version is deficient in its content and evidence base and does not reflect national guidance. Test of Soundness

4.2. Avant Homes considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification

4.3. Avant Homes is concerned with the Spatial Strategy and distribution. Avant Homes would expect the spatial strategy and distribution to provide an appropriate development pattern and support economic growth and sustainable development within all market areas.

4.4. The Strategy at present focusses growth towards Doncaster, followed by the Main Towns and then a smaller element in the Service Towns and Larger Villages and then no development in other defined villages. Therefore no new housing is proposed in the rural economy in settlements which are relatively sustainable. This approach is broadly consistent with the strategy set out in the UDP and subsequent Core Strategy. Avant Homes are concerned that this risks focusing development in less viable areas and risks undermining the delivery of the Plan.

4.5. The implementation of the Spatial Strategy will be discussed in response to Policy 6 and the proposed allocations.

4.6. Doncaster is an integral part of the Sheffield City Region and the ambitious growth aspirations. The Strategic Economic Plan sets out the Sheffield City Region’s plans to transform the local economy over the next decade. At the heart of the plan is the creation of 70,000 new private sector jobs and 6,000 new businesses.

4.7. Therefore, to achieve the aspired growth that the City Region is seeking to achieve and is securing Government funding for the level of new housing needs to reflect the ambitions of the Strategic Economic Plan. Furthermore, the Sheffield City Region Integrated Infrastructure Plan states: A quality housing offer has a crucial role to play in the future economic growth of the City Region. It is essential to attracting and retaining a skills base that supports inward investment as we as meeting existing and future community needs and retention of Sheffield City Region (SCR) talent. It has been identified that between 70,000 and 100,000 additional homes are needed in SCR to support the proposed economic growth over the next 10 years. These will have the dual benefit of providing accommodation that underpins the proposed increase in employment (70,000 jobs), as well as the wider economic benefits that housing investment brings. Housing forms a key component of the SCR construction sector. The CBI [CBI (2012) Bridging the Gap - Backing the Construction Sector to Create Jobs] estimates that every £1 spent on construction projects yields a total of £2.84 expenditure in the wider economy. It is estimated that approximately £2,000 per annum per household spending on local convenience goods, and approximately £2,700 per annum per household spending on local comparison goods can be attributed to residents in new housing. (Over the lifetime of the SEP, a similar amount would generate at least £400 million for the SCR economy). The GVA benefits that can be attributable to new housing are as follows:

- Construction: material, labour professional skills and other services for construction, compounded by supply chain benefits
- Household Maintenance Spend: Spend on products and services associated with each new household
- Direct Job Uptake: GVA resulting from new productive workers moving into SCR, compounded by their spend on SCR products and services
- Indirect (Chain) Benefits: As SCR residents move up the housing chain, this creates new available space in different sub-markets.

4.8. Furthermore, the Sheffield City Region Integrated Infrastructure Plan states: A quality housing offer has a crucial role to play in the future economic growth of the City Region. It is essential to attracting and retaining a skills base that supports inward investment as we as meeting existing and future community needs and retention of Sheffield City Region (SCR) talent. It has been identified that between 70,000 and 100,000 additional homes are needed in SCR to support the proposed economic growth over the next 10 years. These will have the dual benefit of providing accommodation that underpins the proposed increase in employment (70,000 jobs), as well as the wider economic benefits that housing investment brings. Housing forms a key component of the SCR construction sector. The CBI [CBI (2012) Bridging the Gap - Backing the Construction Sector to Create Jobs] estimates that every £1 spent on construction projects yields a total of £2.84 expenditure in the wider economy. It is estimated that approximately £2,000 per annum per household spending on local convenience goods, and approximately £2,700 per annum per household spending on local comparison goods can be attributed to residents in new housing. (Over the lifetime of the SEP, a similar amount would generate at least £400 million for the SCR economy). The GVA benefits that can be attributable to new housing are as follows:

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- Direct Job Uptake: GVA resulting from new productive workers moving into SCR, compounded by their spend on SCR products and services
- Indirect (Chain) Benefits: As SCR residents move up the housing chain, this creates new available space in different sub-markets.

4.9. Within this context it is important that the Council plans for new jobs and associated new homes in accordance with the Strategic Economic Plan growth aspirations.

4.10. To achieve this approach, Avant Homes consider the Local Plan should:

- Focus the majority of development upon Doncaster Main Urban Area but review the likely housing yield from existing sites with planning permission and proposed allocations to ensure that they can all be delivered within the Plan Period. This is explained further in response to Policy 3.
- To focus growth and regeneration on the Main Towns of appropriate scale for their needs and the economic growth aspirations of the Borough. Rossington should be an area of growth given the provision of new infrastructure, its location near to Doncaster Airport, and the scale of economic growth planned at IPort. Thorne and Moorends should grow to reflect its location, regeneration ambitions connected with the logistics and employment parks, and level of facilities available within the designated town and local centres. Within that context Carcroft and Skellow is of similar scale to the Main Towns and should be identified as such, particularly with its provision of employment parks and location on the A1(M) and focus on regeneration and growth.
- Provision should be made in the Service Towns and Larger Villages to reflect their scale and function. These are sustainable towns and villages which serve a hinterland. Wadworth is of a similar scale and function of these settlements and should therefore be defined as such, with appropriate allocations made, recognising its proximity and connectivity to the Main Urban Area.
- Defined Villages are sustainable villages serving a rural economy and should accommodate a level of development appropriate to their scale and function in line with the provisions Framework (paragraph 78).

4.11. Avant Homes consider that the above approach meets the Local Plan vision and objectives identified within the Local Plan but is also one that is more aligned with the principles of sustainable development.

4.12. Policy 2 establishes the strategic approach to the Green Belt within Doncaster and states that the general extent of the Green Belt will be retained. Avant Homes is concerned that Green Belt boundaries have been drawn tightly around settlements and proposed allocations and as such does not have regard to the intended permanence in the long term so that the boundaries can endure beyond the Plan period. Policy 3 and 6 do not identify any safeguarded land. The Plan does identify reserve sites. However these sites have significant technical constraints. Avant Homes do not consider that they are suitable pool of sites due to the significant constraints and object to their identification in the Plan.
definitive guidance indicating the amount of land which should be safeguarded the Framework (2019) is clear that where necessary Local Plans should ‘identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period’, and that local authorities should ‘be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period’. Given that the council considers that the majority of sites will be delivered within the plan period. It is highly likely that further alterations to the green belt will be required at the next review of the Plan. This is not consistent with the provisions of the Framework. 4.14. Avant Homes consider that Policy 2 should establish the approach to Safeguarding land and that safeguarded land should be identified, not only provide a robust long-term Green Belt boundary but will also provide certainty for residents and developers alike in terms of likely growth locations beyond the end of the plan period. Avant Homes therefore suggest that such land be allocated in the Plan across the spatial hierarchy, including smaller settlements per the earlier spatial approach. 4.15. Avant homes consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 4.16. However, Avant Homes consider that with the proposed changes to the strategy and establishing the approach to safeguarding land the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 4.17. To overcome the objection and address soundness matters, the Council should: - Reflect economic and housing growth aspirations - Amend the Spatial Strategy as indicated - Identify safeguarded land or suitable Reserve Development Sites across the spatial hierarchy

Summary:
Concerned about the spatial strategy and distribution - would expect it to provide an appropriate development pattern and support economic growth and sustainable development in all market areas. No housing is proposed in the rural economy in settlements which are relatively sustainable. The approach is broadly consistent with the UDP and Core Strategy. Concern that the focus on less viable areas risks undermining plan delivery. - Level of new housing needs to reflect the ambitions of the SCR strategic economic plan. Housing and construction bring money into the wider economy. The GVA benefits that can be attributable to new housing include: - Construction: material, labour professional skills and other services for construction, compounded by supply chain benefits - Household Maintenance Spend: Spend on products and services associated with each new household - Direct Job Uptake: GVA resulting from new productive workers moving into SCR, compounded by their spend on SCR products and services - Indirect (Chain) Benefits): As SCR residents move up the housing chain, this creates new available space in different sub-markets. - Preventing Displacement: The type and location of construction may be important in mitigating losses of households from the city region that might otherwise occur. It is important that the Council plans for new jobs and associated new homes in accordance with the Strategic Economic Plan growth aspirations. Therefore, the Local Plan should: - Focus development on the urban area but review the likely yield from existing sites with permission and proposed allocations to ensure they can all be delivered in the plan period. - To ensure Main Town growth is of an appropriate scale for their needs and the boroughs economic growth aspirations. Rossington should be an area of growth given new infrastructure there and it’s location close to the airport, and iport. Thorne and Moorends should also grow to reflect its location, regeneration ambitions connected to employment parks and level of facilities locally available. Carcroft - Skellow should also be identified as a Main Town given it's location close to employment parks and close to the A1(M) - Provision should be made in Service Towns and Villages to reflect their scale and function as sustainable locations which serve a hinterland. Wadsworth should be defined as such as it is of a similar scale and function with appropriate allocations made recognising its proximity and connectivity to the urban area. - Defined villages are sustainable and serve a rural economy and should accommodate a level of development appropriate to their scale and function in line with para. 78 of the NPPF. Barnsley took a similar approach in not identifying village allocations (LG2) and the inspector found it unsound, leading to Barnsley reviving settlements and finding additional sites. The above approach would better align with the vision and objectives of the plan, as well as being better aligned with the principles of sustainable development. Concern that Green Belt boundaries have been tightly drawn around settlements and allocations and thus has no regard for permanence in the long term so boundaries endure. No safeguarded land is identified. Reserve sites have significant technical constraints to them. They are not a suitable pool due to the constraints and they are objected to their inclusion. It is highly likely given that most sites will be completed in the plan period that Green Belt will be required after it. Not safeguarding the land is therefore inconsistent with the NPPF which says boundaries should endure beyond the plan period. Safeguarded land should be identified and established in Policy 2 to provide certainty to developers and residents in terms of likely growth locations beyond the plan period. Land should be allocated across the hierarchy, including to smaller settlements as per the suggested spatial approach. The current policy is unjustified and not consistent with the framework, and the plan could fail to deliver sustainable development in accordance with the framework. As such, the plan is not considered sound. Proposed change: To overcome the objection and address soundness matters, the Council should: - Reflect economic and housing growth aspirations - Amend the Spatial Strategy as indicated - Identify safeguarded land or suitable Reserve Development Sites across the spatial hierarchy

Response:
The approach to the distribution of housing is explained in the Housing Topic Paper. The approach allocates housing to the most sustainable locations, including economic growth to the more sustainable Main Urban Area and Main Towns, but does provide opportunities for some limited development in smaller localities to support these rural areas. The approach to Green Belt, including the decision not to safeguard land, is discussed in the Green Belt Topic Paper. NPPF states boundaries should be clearly defined and not include land which is unnecessary to keep permanently open and that boundaries should be drawn using readily recognisable features. Reserve development sites are sites which do not count towards any housing calculations, but are sites where housing could be located if the technical constraints can be overcome.
4.1. Avant Homes is concerned that the Doncaster Local Plan 2015-2035 Publication Version is deficient in its content and evidence base and does not reflect national guidance. Test of Soundness 4.2. Avant Homes considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 4.3. Avant Homes is concerned with the Spatial Strategy and distribution. Avant Homes would expect the spatial strategy and distribution to provide an appropriate development pattern and support economic growth and sustainable development within all market areas. 4.4. The Strategy at present focusses growth towards Doncaster, followed by the Main Towns and then a smaller element in the Service Towns and Larger Villages and then no development in other defined villages. Therefore no new housing is proposed in the rural economy in settlements which are relatively sustainable. This approach is broadly consistent with the strategy set out in the UDP and subsequent Core Strategy. Avant Homes are concerned that this risks focusing development in less viable areas and risks undermining the delivery of the Plan. 4.5. The implementation of the Spatial Strategy will be discussed in response to Policy 6 and the proposed allocations. 4.6. Doncaster is an integral part of the Sheffield City Region and the ambitious growth aspirations. The Strategic Economic Plan sets out the Sheffield City Region’s plans to transform the local economy over the next decade. At the heart of the plan is the creation of 70,000 new private sector jobs and 6,000 new businesses. 4.7. Therefore, to achieve the aspired growth that the City Region is seeking to achieve and is securing Government funding for the level of new housing needs to reflect the ambitions of the Strategic Economic Plan. 4.8. Furthermore, the Sheffield City Region Integrated Infrastructure Plan states: A quality housing offer has a crucial role to play in the future economic growth of the City Region. It is essential to attracting and retaining a skills base that supports inward investment as we as meeting existing and future community needs and retention of Sheffield City Region (SCR) talent. It has been identified that between 70,000 and 100,000 additional homes are needed in SCR to support the proposed economic growth over the next 10 years. These will have the dual benefit of providing accommodation that underpins the proposed increase in employment (70,000 jobs), as well as the wider economic benefits that housing investment brings. Housing forms a key component of the SCR construction sector. The CBI [CBI (2012) Bridging the Gap - Backing the Construction Sector to Create Jobs] estimates that every £1 spent on construction projects yields a total of £2.84 expenditure in the wider economy. It is estimated that approximately £2,000 per annum per household spending on local convenience goods, and approximately £2,700 per annum per household spending on local comparison goods can be attributed to residents in new housing. (Over the lifetime of the SEP, a similar amount would generate at least £400 million for the SCR economy). The GVA benefits that can be attributable to new housing are as follows: - Construction: material, labour professional skills and other services for construction, compounded by supply chain benefits - Household Maintenance Spend: Spend on products and services associated with each new household - Direct Job Uptake: GVA resulting from new productive workers moving into SCR, compounded by their spend on SCR products and services - Indirect (Chain) Benefits: As SCR residents move up the housing chain, this creates new available space in different sub-markets. - Preventing Displacement: The type and location of construction may be important in mitigating losses of households from the city region that might otherwise occur. 4.9. Within this context it is important that the Council plans for new jobs and associated new homes in accordance with the Strategic Economic Plan growth aspirations. 4.10. To achieve this approach, Avant Homes consider the Local Plan should: - Focus the majority of development upon Doncaster Main Urban Area but review the likely housing yield from existing sites with planning permission and proposed allocations to ensure that they can all be delivered within the Plan Period. This is explained further in response to Policy 3. - To focus growth and regeneration on the Main Towns of appropriate scale for their needs and the economic growth aspirations of the Borough. Rossington should be an area of growth given the provision of new infrastructure, its location near to Doncaster Airport, and the scale of economic growth planned at IPort. Thorne and Moorends should grow to reflect its location, regeneration ambitions connected with the logistics and employment parks, and level of facilities available within the designated town and local centres. Within that context Carcroft and Skellow is of similar scale to the Main Towns and should be identified as such, particularly with its provision of employment parks and location on the A1(M) and focus on regeneration and growth. - Provision should be made in the Service Towns and Larger Villages to reflect their scale and function. These are sustainable towns and villages which serve a hinterland. Wadworth is of a similar scale and function of these settlements and should therefore be defined as such, with appropriate allocations made, recognising its proximity and connectivity to the Main Urban Area. - Defined Villages are sustainable villages serving a rural economy and should accommodate a level of development appropriate to their scale and function in line with the provisions Framework (paragraph 78). Avant note that Barnsley Metropolitan Borough Council sought to take a similar approach and did not identify allocations within the villages. The Inspector considered that the Plan was not positively prepared in relation to the approach to the villages and considered that policy LG2 was unsound. In this case the local authority reviewed the settlements and identified additional sites within the villages to accommodate new development. 4.11. Avant Homes consider that the above approach meets the Local Plan vision and objectives identified within the Local Plan but is also one that is more aligned with the principles of sustainable development. 4.12. Policy 2 establishes the strategic approach to the Green Belt within Doncaster and states that the general extent of the Green Belt will be retained. Avant Homes is concerned that Green Belt boundaries have been drawn tightly around settlements and proposed allocations and as such does not have regard to the intended permanence in the long term so that the boundaries can endure beyond the Plan period. Policy 3 and 6 do not identify any safeguarded land. The Plan does identify reserve sites. However these sites have significant technical constraints. Avant Homes do not consider that they are suitable pool of sites due to the significant constraints and object to their identification in the Plan. 4.13. Whilst there is no
definitive guidance indicating the amount of land which should be safeguarded the Framework (2019) is clear that where necessary Local Plans should 'identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period', and that local authorities should 'be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period'. Given that the council considers that the majority of sites will be delivered within the plan period. It is highly likely that further alterations to the green belt will be required at the next review of the Plan. This is not consistent with the provisions of the Framework. 4.14. Avant Homes consider that Policy 2 should establish the approach to Safeguarding land and that safeguarded land should be identified, not only provide a robust long-term Green Belt boundary but will also provide certainty for residents and developers alike in terms of likely growth locations beyond the end of the plan period. Avant Homes therefore suggest that such land be allocated in the Plan across the spatial hierarchy, including smaller settlements per the earlier spatial approach. 4.15. Avant homes consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 4.16. However, Avant Homes consider that with the proposed changes to the strategy and establishing the approach to safeguarding land the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 4.17. To overcome the objection and address soundness matters, the Council should: - Reflect economic and housing growth aspirations - Amend the Spatial Strategy as indicated - Identify safeguarded land or suitable Reserve Development Sites across the spatial hierarchy

Summary:
Concerned about the spatial strategy and distribution - would expect it to provide an appropriate development pattern and support economic growth and sustainable development in all market areas. No housing is proposed in the rural economy in settlements which are relatively sustainable. The approach is broadly consistent with the UDP and Core Strategy. Concern that the focus on less viable areas risks undermining plan delivery. - Level of new housing needs to reflect the ambitions of the SCR strategic economic plan. Housing and construction bring money into the wider economy. The GVA benefits that can be attributable to new housing include: - Construction: material, labour professional skills and other services for construction, compounded by supply chain benefits - Household Maintenance Spend: Spend on products and services associated with each new household - Direct Job Uptake: GVA resulting from new productive workers moving into SCR, compounded by their spend on SCR products and services - Indirect (Chain) Benefits): As SCR residents move up the housing chain, this creates new available space in different sub-markets. - Preventing Displacement: The type and location of construction may be important in mitigating losses of households from the city region that might otherwise occur. It is important that the Council plans for new jobs and associated new homes in accordance with the Strategic Economic Plan growth aspirations. Therefore, the Local Plan should: - Focus development on the urban area but review the likely yield from existing sites with permission and proposed allocations to ensure they can all be delivered in the plan period. - To ensure Main Town growth is of an appropriate scale for their needs and the boroughs economic growth aspirations. Rossington should be an area of growth given new infrastructure there and it's location close to the airport, and iport. Thorne and Moorsend should also grow to reflect its location, regeneration ambitions connected to employment parks and level of facilities locally available. Carkcroft - Skellow should also be identified as a Main Town given it's location close to employment parks and close to the A1(M) - Provision should be made in Service Towns and Villages to reflect their scale and function as sustainable locations which serve a hinterland. Wadworth should be defined as such as it is of a similar scale and function with appropriate allocations made recognising its proximity and connectivity to the urban area. - Defined villages are sustainable and serve a rural economy and should accommodate a level of development appropriate to their scale and function in line with para. 78 of the NPPF. Barnsley took a similar approach in not identifying village allocations (LG2) and the inspector found it unsound, leading to Barnsley reviving settlements and finding additional sites. The above approach would better align with the vision and objectives of the plan, as well as being better aligned with the principles of sustainable development. Concern that Green Belt boundaries have been tightly drawn around settlements and allocations and thus has no regard for permanence in the long term so boundaries endure. No safeguarded land is identified. Reserve sites have significant technical constraints to them. They are not a suitable pool due to the constraints and they are objected to their inclusion. It is highly likely given that most sites will be completed in the plan period that Green Belt will be required after it. Not safeguarding the land is therefore inconsistent with the NPPF which says boundaries should endure beyond the plan period. Safeguarded land should be identified and established in Policy 2 to provide certainty to developers and residents in terms of likely growth locations beyond the plan period. Land should be allocated across the hierarchy, including to smaller settlements as per the suggested spatial approach. The current policy is unjustified and not consistent with the framework, and the plan could fail to deliver sustainable development in accordance with the framework. As such, the plan is not considered sound. Proposed change: To overcome the objection and address soundness matters, the Council should: - Reflect economic and housing growth aspirations - Amend the Spatial Strategy as indicated - Identify safeguarded land or suitable Reserve Development Sites across the spatial hierarchy

Response:
The approach to the distribution of housing is explained in the Housing Topic Paper. The approach allocates housing to the most sustainable locations, including economic growth to the more sustainable Main Urban Area and Main Towns, but does provide opportunities for some limited development in smaller localities to support these rural areas. The approach to Green Belt, including the decision not to safeguard land, is discussed in the Green Belt Topic Paper. NPPF states boundaries should be clearly defined and not include land which is unnecessary to keep permanently open and that boundaries should be drawn using readily recognisable features. Reserve development sites are sites which do not count towards any housing calculations, but are sites where housing could be located if the technical constraints can be overcome.
Policy 2 (Spatial Strategy and Settlement Hierarchy) is not consistent with the National Planning Policy Framework (NPPF) for the following reasons: - The defined Development Limits as shown on the proposal map do not include all allocated sites, this should be updated to ensure all relevant sites are included; including site 970 (Land off Doncaster Road, Hatfield) which has planning permission, reserved matters approval and has commenced. - Criterion 5 sets out that residential development will be supported in the Countryside if adjacent to a Development Limit of a settlement in the Main Urban Area, Main Towns or Service Towns/Villages but excludes development within Defined Villages. This is contrary to the NPPF which supports sustainable development in suitable locations. Whilst Defined Villages are positioned at the bottom of the defined settlement hierarchy this does should not inhibit development of an appropriate scale within the Countryside if adjacent to a Development Limit. This criterion should therefore be reworded as follows: “Residential development will also be supported in the Countryside if adjacent to a Development Limit of a settlement as outlined above, where?” - Criterion 5E notes that residential development in the Countryside will only be supported where a five-year borough-wide supply of housing land cannot be demonstrated and the development would make a significant contribution to housing land supply. The NPPF supports sustainable development and whilst consideration of 5-year housing land supply may be an attribute which weighs into this consideration, there is no requirement for demonstration of a lack of a 5YHLS for development within the Countryside to be acceptable. NPPF paragraph 73 requires LPAs to be able to demonstrate a 5YHLS at all times as a minimum therefore waiting until this has occurred before releasing sustainable sites that would comply with the other criteria of part 5 is not positive and would be contrary to the NPPF. Sustainable sites that comply with part 5 should be released to ensure that supply remains above 5 years and/or 920 dwellings per annum (dpa). Criterion 5E should therefore be deleted in its entirety. In addition to the above we note that there is a tension between part 5 of Policy 2 (Spatial Strategy and Settlement Hierarchy) and Policy 26 (Development in the Countryside) in that they set out different requirements for development within the Countryside but lack clarity between the difference in consideration of edge of settlement sites and those located in isolated locations within the Countryside. The policies and their supporting text should be amended to make clear the difference between development proposals on the edge of sustainable settlements (Policy 2) and requirements for development in isolated areas of the Countryside (Policy 26). Notwithstanding the above, we acknowledge and support the Councils identification of Hatfield as a highly sustainable location within the settlement hierarchy which is suitable for development.

Summary:
Objects to Policy 2 (Spatial Strategy & Settlement Hierarchy) as not consistent with NPPF. All allocated sites should be included within development limits, including Site Ref 970 (Doncaster Road, Hatfield) which is permissioned and now commenced. Criterion 5 in respect to supporting development in the Countryside if adjacent to a development limit in a settlement in the top 2 tiers of the hierarchy excludes Defined Villages and NPPF supports sustainable development in suitable locations. Criterion 5E requires demonstration of a lack of 5YHLS and where the development would make a significant contribution. This does not comply with NPPF as does not require lack of 5YHLS to support development in the countryside. Must be able to demonstrate a 5YHLS at all times and waiting until this cannot be shown before releasing sites is not positive. Sustainable sites that comply with Criterion 5E should be released to ensure supply remains above 5 years and/or 920dpa. Criterion 5E should be deleted entirely. There is also a tension between part 5 of Policy 2 and Policy 26 in that they set out different requirements for development in the countryside but lack clarity in the consideration of edge of settlement sites and those located in isolated locations. Policies and supporting text should be amended to make clear the difference. Notwithstanding the above we acknowledge and support the Council’s identification of Hatfield as a highly sustainable location within the hierarchy and suitable for development.

Response:
The Development Limits methodology was subject to previous consultation (2018) and re-published alongside the Publication version of the plan. It has always proposed that greenfield urban extension allocations should be excluded from development limits, but would be incorporated when the permission/development has been implemented through a future review of the plan. This is a logical approach, especially so for larger allocations where development will include not just housing but other non-urban uses which may still remain outside of development limits depending on final layouts e.g. landscaping, public open space, balancing ponds etc. Policy 3 provides further policy in respect to growth to the Countryside Defined Villages outside of development limits. Criterion 5E is considered appropriate in the context of an up-to-date local plan with sufficient allocations being made for the plan period with numerous sources of additional housing supply and the government’s emphasis on having a plan-led approach. That said, should circumstances change during the plan period then the policy provides flexibility to bring forward a further source of supply and will assist ensuring that any such proposals come forward with some policy to help bring forward sustainable extensions to settlements with a Countryside boundary. It is not considered that there is a tension between Part 5 of this policy and Policy 26 (Countryside). General support for Hatfield being identified as a sustainable location within the hierarchy welcomed.
Chapter 4: Strategic Approach

Policy 2: Spatial Strategy & Settlement Hierarchy

Tests of Soundness:
- Positively prepared
- Effective
- Consistent with national

Comment:

4.1. Priority Space is concerned that the Doncaster Local Plan 2015-2035 Publication Version is deficient in its content and evidence base and does not reflect national guidance. Test of Soundness

4.2. Priority Space considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy

4.3. Priority Space is concerned with the Spatial Strategy and distribution. Priority Space would expect the spatial strategy and distribution to provide an appropriate development pattern and support economic growth and sustainable development within all market areas. 4.4. The Strategy at present focusses growth towards Doncaster, followed by the Main Towns and then a smaller element in the Service Towns and Larger Villages and then no development in other defined villages. Therefore no new housing is proposed in the rural economy in settlements which are relatively sustainable. This approach is broadly consistent with the strategy set out in the UDP and subsequent Core Strategy. Priority Space are concerned that this risks focussing development in less viable areas and risks undermining the delivery of the Plan. 4.5. The implementation of the Spatial Strategy will be discussed in response to Policy 6 and the proposed allocations: 4.6. Doncaster is an integral part of the Sheffield City Region and the ambitious growth aspirations. The Strategic Economic Plan sets out the Sheffield City Region’s plans to transform the local economy over the next decade. At the heart of the plan is the creation of 70,000 new private sector jobs and 6,000 new businesses. 4.7. Therefore, to achieve the aspired growth that the City Region is seeking to achieve and is securing Government funding for the level of new housing needs to reflect the ambitions of the Strategic Economic Plan. 4.8. Furthermore, the Sheffield City Region Integrated Infrastructure Plan states: A quality housing offer has a crucial role to play in the future economic growth of the City Region. It is essential to attracting and retaining a skills base that supports inward investment as we as meeting existing and future community needs and retention of Sheffield City Region (SCR) talent. It has been identified that between 70,000 and 100,000 additional homes are needed in SCR to support the proposed economic growth over the next 10 years. These will have the dual benefit of providing accommodation that underpins the proposed increase in employment (70,000 jobs), as well as the wider economic benefits that housing investment brings. Housing forms a key component of the SCR construction sector. The CBI [CBI (2012) Bridging the Gap - Backing the Construction Sector to Create Jobs] estimates that every £1 spent on construction projects yields a total of £2.84 expenditure in the wider economy. It is estimated that approximately £2,000 per annum per household spending on local convenience goods, and approximately £2,700 per annum per household spending on local comparison goods can be attributed to residents in new housing. (Over the lifetime of the SEP, a similar amount would generate at least £400 million for the SCR economy). The GVA benefits that can be attributable to new housing are as follows: - Construction: material, labour professional skills and other services for construction, compounded by supply chain benefits - Household Maintenance Spend: Spend on products and services associated with each new household - Direct Job Uptake: GVA resulting from new productive workers moving into SCR, compounded by their spend on SCR products and services - Indirect (Chain) Benefits: As SCR residents move up the housing chain, this creates new available space in different sub-markets. - Preventing Displacement: The type and location of construction may be important in mitigating losses of households from the city region that might otherwise occur. 4.9. Within this context it is important that the Council plans for new jobs and associated new homes in accordance with the Strategic Economic Plan growth aspirations. 4.10. To achieve this approach, Priority Space consider the Local Plan should: - Focus the majority of development upon Doncaster Main Urban Area but review the likely housing yield from existing sites with planning permission and proposed allocations to ensure that they can all be delivered within the Plan Period. This is explained further in response to Policy 3. - To focus growth and regeneration on the Main Towns of appropriate scale for their needs and the economic growth aspirations of the Borough. Rossington should be an area of growth given the provision of new infrastructure, its location near to Doncaster Airport, and the scale of economic growth planned at tIPort. Thorne and Moornds should grow to reflect its location, regeneration ambitions connected with the logistics and employment parks, and level of facilities available within the designated town and local centres. Within that context Carcroft and Skellow is of similar scale to the Main Towns and should be identified as such, particularly with its provision of employment parks and location on the A1(M) and focus on regeneration and growth. - Provision should be made in the Service Towns and Larger Villages to reflect their scale and function. These are sustainable towns and villages which serve a hinterland. Wadworth is of a similar scale and function of these settlements and should therefore be defined as such, recognising its proximity and connectivity to the Main Urban Area. -Defined Villages are sustainable villages serving a rural economy and should accommodate a level of development appropriate to their scale and function in line with the provisions Framework (paragraph 78). 4.11. Priority Space consider that the above approach meets the Local Plan vision and objectives identified within the Local Plan but is also one that is more aligned with the principles of sustainable development. 4.12. Policy 2 establishes the strategic approach to the Green Belt within Doncaster and states that the general extent of the Green Belt will be retained. Priority Space is concerned that Green Belt boundaries have been drawn tightly around settlements and proposed allocations and as such does not have regard to the intended permanence in the long term so that the boundaries can endure beyond the Plan period. Policy 3 and 6 do not identify any safeguarded land. The Plan does identify reserve sites. However these sites have significant technical constraints. Priority Space do not consider that they are suitable pool of sites due to the significant constraints and object to their identification in the Plan. 4.13. Whilst there is no definitive guidance indicating the amount of land which should be safeguarded the Framework (2019) is clear that where necessary Local Plans should 'identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period', and that local authorities should 'be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period'. Given that the council
considers that the majority of sites will be delivered within the plan period. It is highly likely that further alterations to the green belt will be required at the next review of the Plan. This is not consistent with the provisions of the Framework. 4.14. Priority Space consider that Policy 2 should establish the approach to Safeguarding land and that safeguarded land should be identified, not only provide a robust long-term Green Belt boundary but will also provide certainty for residents and developers alike in terms of likely growth locations beyond the end of the plan period. Priority Space therefore suggest that such land be allocated in the Plan across the spatial hierarchy, including smaller settlements per the earlier spatial approach. 4.15. Priority Space consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 4.16. However, Priority Space consider that with the proposed changes to the strategy and establishing the approach to safeguarding land the Local Plan can be found sound. Priority Space will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 4.17. To overcome the objection and address soundness matters, the Council should: - Reflect economic and housing growth aspirations - Amend the Spatial Strategy as indicated - Identify safeguarded land or suitable Reserve Development Sites across the spatial hierarchy

Summary:

| Policy 2 - Spatial strategy and Settlement Hierarchy | Distribution of housing should be reviewed and include more at service towns and villages. 2. Defined villages should have some growth. 3. Rossington/Thorne Moorends/Carcroft Skellow should have a greater share - this would be a more sustainable approach. Reserve sites - 1. The identified sites have significant technical constraints. 2. They are not a suitable pool of sites. 3. Object to them being in the Plan. Greenbelt Boundaries 1. Boundaries as drawn are too tight. 2. Likely they will need re-drawing at next review of plan. Safeguarded land. 1. Not an adequate amount of safeguarded Land. 2. Should be identified across the spatial hierarchy. Proposed changes: 1. Policy should reflect economic and housing growth aspirations. 2. Sites with permission should be reviewed to access deliverability in the plan period. 3. Spatial strategy should be amended. 4. Identify safeguarded land or suitable reserve sites. |

Response:

The approach to the distribution of housing is explained in the Housing Topic Paper. The approach allocates housing to the most sustainable locations, including economic growth to the more sustainable Main Urban Area and Main Towns, but does provide opportunities for some limited development in smaller localities to support these rural areas. The approach to Green Belt, including the decision not to safeguard land, is discussed in the Green Belt Topic Paper. NPPF states boundaries should be clearly defined and not include land which is unnecessary to keep permanently open and that boundaries should be drawn using readily recognisable features. Reserve development sites are sites which do not count towards any housing calculations, but are sites where housing could be located if the technical constraints can be overcome.
4.1. Firsure is concerned that the Doncaster Local Plan 2015-2035 Publication Version is deficient in its content and evidence base and does not reflect national guidance. Test of Soundness 4.2. Firsure considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 4.3. Firsure is concerned with the Spatial Strategy and distribution. Firsure would expect the spatial strategy and distribution to provide an appropriate development pattern and support economic growth and sustainable development within all market areas. 4.4. The Strategy at present focusses growth towards Doncaster, followed by the Main Towns and then a smaller element in the Service Towns and Larger Villages and then no development in other defined villages. Therefore no new housing is proposed in the rural economy in settlements which are relatively sustainable. This approach is broadly consistent with the strategy set out in the UDP and subsequent Core Strategy. Firsure are concerned that this focuses development in less viable areas and risks under deliver. 4.5. The implementation of the Spatial Strategy will be discussed in response to Policy 6 and the proposed allocations. 4.6. Doncaster is an integral part of the Sheffield City Region and the ambitious growth aspirations. The Strategic Economic Plan sets out the Sheffield City Region's plans to transform the local economy over the next decade. At the heart of the plan is the creation of 70,000 new private sector jobs and 6,000 new businesses. 4.7. Therefore, to achieve the aspired growth that the City Region is seeking to achieve and is securing Government funding for the level of new housing needs to reflect the ambitions of the Strategic Economic Plan. 4.8. Furthermore, the Sheffield City Region Integrated Infrastructure Plan states: A quality housing offer has a crucial role to play in the future economic growth of the City Region. It is essential to attracting and retaining a skills base that supports inward investment as we as meeting existing and future community needs and retention of Sheffield City Region (SCR) talent. It has been identified that between 70,000 and 100,000 additional homes are needed in SCR to support the proposed economic growth over the next 10 years. These will have the dual benefit of providing accommodation that underpins the proposed increase in employment (70,000 jobs), as well as the wider economic benefits that housing investment brings. Housing forms a key component of the SCR construction sector. The CBI [CBI (2012) Bridging the Gap - Backing the Construction Sector to Create Jobs] estimates that every #1 spent on construction projects yields a total of #2.84 expenditure in the wider economy. It is estimated that approximately #2,000 per annum per household spending on local convenience goods, and approximately #2,700 per annum per household spending on local comparison goods can be attributed to residents in new housing. (Over the lifetime of the SEP, a similar amount would generate at least #400 million for the SCR economy). The GVA benefits that can be attributable to new housing are as follows: - Construction: material, labour professional skills and other services for construction, compounded by supply chain benefits - Household Maintenance Spend: Spend on products and services associated with each new household - Direct Job Uptake: GVA resulting from new productive workers moving into SCR, compounded by their spend on SCR products and services - Indirect (Chain) Benefits: As SCR residents move up the housing chain, this creates new available space in different sub-markets. - Preventing Displacement: The type and location of construction can be important in mitigating losses of households from the city region that might otherwise occur. 4.9. Within this context it is important that the Council plans for new jobs and associated new homes in accordance with the Strategic Economic Plan growth aspirations. 4.10. To achieve this approach, Firsure consider the Local Plan should: - Focus the majority of development upon Doncaster Main Urban Area but review the likely housing yield from existing sites with planning permission and proposed allocations to ensure that they can all be delivered within the Plan Period. This is explained further in response to Policy 3. - To focus growth and regeneration on the Main Towns of appropriate scale for their needs and the economic growth aspirations of the Borough. Rossington should be an area of growth given the provision of new infrastructure, its location near to Doncaster Airport, and the scale of economic growth planned at IPort. Thorne and Moorends should grow to reflect its location, regeneration ambitions connected with the logistics and employment parks, and level of facilities available within the designated town and local centres. Within that context Carcroft and Skellow is of similar scale to the Main Towns and should be identified as such, particularly with its provision of employment parks and location on the A1(M) and focus on regeneration and growth. - Provision should be made in the Service Towns and Larger Villages to reflect their scale and function. These are sustainable towns and villages which serve a hinterland. Wadhurst is of a similar scale and function of these settlements and should therefore be defined as such, recognising its proximity and connectivity to the Main Urban Area. - Defined Villages are sustainable villages serving a rural economy and should accommodate a level of development appropriate to their scale and function in line with the provisions Framework (paragraph 78). 4.11. Firsure consider that the above approach meets the Local Plan vision and objectives identified within the Local Plan but is also one that is more aligned with the principles of sustainable development. 4.12. Policy 2 establishes the strategic approach to the Green Belt within Doncaster and states that the general extent of the Green Belt will be retained. Firsure is concerned that Green Belt boundaries have been drawn tightly around settlements and proposed allocations and as such does not have regard to the intended permanence in the long term so that the boundaries can endure beyond the Plan period. Policy 3 and 6 do not identify any safeguarded land. The Plan does identify reserve sites. However these sites have significant technical constraints. Firsure do not consider that they are suitable pool of sites due to the significant constraints and object to their identification in the Plan. 4.13. Whilst there is no definitive guidance indicating the amount of land which should be safeguarded the Framework (2019) is clear that where necessary Local Plans should ‘identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period’, and that local authorities should ‘be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period’. Given that the council considers that the majority of sites will be delivered within the
The Local Plan should:

- Focus the majority of development upon Doncaster Main Urban Area but review the likely housing yield from existing safeguards and reserve sites. Identify safeguarded land or suitable Reserve Development Sites across the spatial hierarchy.

- Amend the Spatial Strategy so that growth and regeneration on the Main Towns of appropriate scale for their needs and the economic growth aspirations of the Borough.

- Focussing growth at Doncaster, the Main Towns and Service Towns and Larger Villages with no significant technical constraints are not suitable to the significant constraints and should not be identified in the Plan. To overcome the objection and address soundness matters, the Council should:
  - Reflect economic and housing growth aspirations - Amend the Spatial Strategy as indicated - Identify safeguarded land or suitable Reserve Development Sites across the spatial hierarchy.

Summary:

The Spatial Strategy and distribution should provide an appropriate development pattern and support economic growth and sustainable development within all market areas. Focussing growth at Doncaster, the Main Towns and Service Towns and Larger Villages with no significant technical constraints are not suitable to the significant constraints and should not be identified in the Plan. To overcome the objection and address soundness matters, the Council should:

Response:

The approach to the distribution of housing is explained in the Housing Topic Paper. The approach allocates housing to the most sustainable locations, including economic growth to the more sustainable Main Urban Area and Main Towns, but does provide opportunities for some limited development in smaller localities to support these rural areas. The approach to Green Belt, including the decision not to safeguard land, is discussed in the Green Belt Topic Paper. NPPF states boundaries should be clearly defined and not include land which is unnecessary to keep permanently open and that boundaries should be drawn using readily recognisable features. Reserve development sites are sites which do not count towards any housing calculations, but are sites where housing could be located if the technical constraints can be overcome.
Tests of Soundness:

Comment:
This policy sets out the proportion of homes that will be completed in the 'Main Urban Area', 'Main Towns' and the 'Service Towns and Larger Villages'. We support that the distribution of sites will follow a logical hierarchical approach, provide an appropriate development pattern and support sustainable development within all market areas. As per paragraph 2.14 of the Publication Draft Local Plan, Mexborough and Thorne are the largest centres outside of Doncaster and provide a wide range of services (e.g. shops, banks, building societies, libraries and restaurants) serving a wide catchment area. We support that 40% of the housing should go to Main Towns, with particular focus to the most sustainable settlements which include Mexborough. This is echoed in the policy 'Housing allocations and mixed-use allocations to meet local needs housing growth are distributed on a pro-rata basis to the most sustainable and deliverable urban and urban extension sites and, in accordance with a sequential approach to flood risk, to these settlements.' Site 139 is a deliverable and suitable site that can contribute to the local housing growth via an urban extension in one of the most sustainable settlements in Doncaster. The Local Plan should be 'prepared with the objective of contributing to the achievement of sustainable development,' which can be achieved through the allocation of Site 139 for residential development.

Summary:
Policy 2 Spatial Strategy and Settlement Hierarchy o Support hierarchy and proposed distribution.

Response:
Support to the spatial strategy/settlement hierarchy welcomed, including the identification of Mexborough as a Main Town and the proposed housing allocation to the settlement. Note that site 139 is an urban extension to Mexborough capable of contributing towards the Town’s housing target, but the site selection methodology/ Green Belt Review has identified this site as having a weak case for inclusion in further site selection work due to performing strongly in respect to Green Belt purposes.
Comment Ref: C/Policy 2: Manor Farm/05284/1/002

Attend Examination: Attend Hearing

Reason: In order to provide an up to date summary of the status of the development and provide clarification on the particulars of the development.

Area: Chapter 4: Strategic Approach

Policy: Policy 2: Spatial Strategy & Settlement Hierarchy

Tests of Soundness:

Comment:

Proposed Allocation The Manor Farm site remains within the Green Belt, albeit adjacent to the settlement boundary in the draft plan. Policy 2 of the Publication Local Plan sets the Spatial Strategy and Settlement Hierarchy (Strategic Policy). Marr is designated as a Defined village within Policy 2 and as such, does not benefit from specific new housing allocations. However, the policies do support infill developments within settlements which would be considered against other policies of the Plan. Paragraph 4.44 states: "New urban edge allocations have of necessity required land previously designated in the UDP as Green Belt or Countryside; and resulted therefore in amendments to town and village development boundaries to create new defensible boundaries." The objective of the policy is broadly supported, however, it is considered that circumstances, in the form of the recently granted residential planning permission, necessitate an amendment to the Local Plan and proposals Map as drafted. We therefore object to the plan in its current form. The publication version of the Doncaster Local Plan (Regulation 19) Plan continues and proposals map (Fig 2) to identify the site at Manor Farm as Green Belt land located outside of the defined settlement boundary of a tier 4 settlement. (SEE EMAIL FOR Fig 2 - Local Plan Policy Map Extract. (Area edged in red represents suggested amendments to settlement boundary)) Recommendation Although no objection to the wider Green Belt policy is made, it is requested that the settlement boundary of Marr is amended to reflect this recent planning approval for development. Justification The approach taken at paragraph 4.44 has not been applied consistently across the Borough. Where planning applications are approved and are deliverable, these sites should be included within the amended settlement boundaries. Taking this approach, land west of the approved development (application ref. 17/02585/FULM and 17/02586/LBCM) represents infill development and should be included within the settlement boundary as it provides a logical rounding off to the settlement of Marr. The plan is not currently sufficiently Justified, as the Proposal Map does not reflect recently approved planning applications (specifically 17/02585/FULM) and as a result is not Effective in that the approach to settlement boundaries and the Green Belt is inconsistent. Amendments to town and village development boundaries should create new defensible boundaries. The omission of the approved site and adjacent land within the settlement boundary of Marr undermines the local plan methodology and reduces the effectiveness of the Green Belt policy. On this basis, we recommend that the land at Manor Farm is included within the Marr settlement boundary and omitted from the Green Belt to provide a strong defensible settlement boundary that reflects approved permissions for development.

Summary:

Policy 2 The objective of the policy is broadly supported. The recently granted residential planning permission, necessitate an amendment to the Local Plan and proposals Map as drafted. Therefore object to the plan in its current form. The publication version of the Doncaster Local Plan (Regulation 19) Plan continues and proposals map (Fig 2) to identify the site at Manor Farm as Green Belt land located outside of the defined settlement boundary of a tier 4 settlement.

Response:

No exceptional circumstances exist to warrant amendment to the Green Belt boundary.
4.34 It is considered that the site to the east of Broomhouse Lane adjoining the existing employment allocation should be considered for allocation towards the M18 corridor, does not provide a good spread. Proposed changes to make the plan sound 4.32 A review of the Green Belt s strategy development should maintain strong sustainable, cohesive and inclusive communities. 4.30 Taking into account the emphasis of the housing strategy is that need will be met in the most sustainable locations with more housing being allocated to the main urban area and main towns in locations attractive to the market with good access to the Strategic Network and Doncaster Sheffield Airport. 4.12 The second part of the policy sets out the settlement hierarchy as: Doncaster Main Urban Area - Main Towns - Service Towns and Villages - Defined Villages - Countryside - Green Belt. 4.13 The ten service towns and villages include Edlington. The policy states that the service towns and villages will be a focus for accommodating housing, employment, retail and key services to meet their local needs, as well as growth to renew and regenerate any run down neighbourhoods. 4.14 The Strategy is informed by a Settlement Audit of service provision across the Borough and seeks to provide growth proportionate to the existing pattern of development. The explanation for this strategy is to be provided in a Topic Paper which is not currently available. 4.15 Part 6 of the policy relates to the Doncaster Green Belt which is identified on the policies Map. 4.16 The policy states that within the Green Belt, National Planning policy will be applied including the presumption against inappropriate development except in very special circumstances. Soundness of the Spatial Strategy and Distribution of New Development 4.17 We support the general approach of Policy 2, however in the absence of the Settlement Topic Paper we are unable to comment as to whether the spatial strategy and distribution of new development is sound. We are therefore unable to comment on whether the plan and proposed strategy has been positively prepared. We therefore consider the policy is not sound. 4.18 In addition we object to the proposed Green Belt. We do not consider the review of the Green Belt has been positively prepared. We therefore consider the policy is not sound. Reasoning Green Belt Topic Paper 4.19 The Green Belt boundaries have been informed by the Green Belt Review. The text box accompanying Paragraph 4.13 of the Plan states that the Green Belt Topic Paper explains the approach taken in considering the need to release land from the Green Belt. 4.20 Paragraph 2.1.9 of the paper states that national planning policy is clear that the release of land from the Green Belt must be fully justified and only undertaken once a number of tests have been met to prove the case that exceptional circumstances exist for releasing land. 4.21 As a result, the Paper considers housing and employment land separately. The paper refers to the Plan Strategy and states that the main emphasis of the housing strategy is that need will be met in the most sustainable locations with more housing being allocated towards the main urban area and seven main towns as the most sustainable locations for growth. 4.22 For employment sites, the paper states that the focus within the plan is on people being able to travel from home to workplaces and as such sites do not need to be found within specified settlements to meet a strategy (as per housing) and that employment land is based on factors including marketability and location (Para 2.1.11). 4.23 The Green Belt review therefore concludes that there are no exceptional circumstances for releasing Green Belt land for employment purposes in Doncaster as the focus is not on allocating sites in settlements, rather allocating sites in the best locations across the Borough based on criteria including market demand, location and access to the motorway. 4.24 However, at paragraph two of Policy 2, the strategy states that (our underlining); Development should help create and maintain strong, sustainable, cohesive and inclusive communities making the most effective use of previously developed land and the best use of key transport corridors and existing infrastructure, enabling people to access jobs, services and facilities locally. 4.25 The policy continues to state that new development will be focussed in and around existing urban areas, main town and service towns and villages. Reference is made to Major new employment sites and that these will be focussed in locations accessible from the main urban area and main towns in locations attractive to the market with good access to the strategic transport network and Doncaster Sheffield Airport. 4.26 Reference is made to Policy 3 in the supporting text which we comment on separately. 4.27 Overall it is considered that the conclusion is that there are no exceptional circumstances for releasing Green belt land focuses on the delivery of major employment sites associated with the M18 and airport which can be delivered on sites outside the Green Belt. 4.28 The Green Belt review fails to consider the exceptional circumstances associated with other parts of the plan strategy, namely, to protect existing established employment sites and enabling people access to jobs locally. 4.29 There are a number of existing employment sites in the west of the borough and as stated in the strategy development should maintain strong sustainable, cohesive and inclusive communities. 4.30 Taking into account the evidence of existing live work patterns, it is therefore necessary to acknowledge that the housing and employment strategies have to overlap to ensure the plan can be effective. 4.31 The release of Green Belt land to enable housing growth in the main towns and service towns and villages should be met with sufficient land to maintain existing employment opportunities. The allocation of an employment site in the north in addition to those on the M18 corridor, does not provide a good spread. Proposed changes to make the plan sound 4.32 A review of the Green Belt should be carried out to consider the potential for new and expanded employment sites in the west of the borough to reflect and support the housing strategy. 4.33 We note that six potential employment sites were assessed to the south of Edlington at Stage 3 of the Green Belt review for completeness. 4.34 It is considered that the site to the east of Broomhouse Lane adjoining in the existing employment allocation should be considered for removal from the Green Belt. Proposed Employment Site 4.35 The site is currently allocated as open space and included in the Green Belt. The
Summary:
Provides a summary of Policy 2 and Local Plan Spatial Strategy and Settlement Hierarchy... which provides for 'up to 50% of housing is to be focussed on the Main Urban Area, with 40% in Main Towns and 10% in Service Towns and Villages'. The policy states that the service towns and villages will be a focus for accommodating housing, employment, retail and key services growth to meet their local needs, support the general approach of Policy 2. but in the absence of the Settlement Topic Paper we are unable to comment as to whether the spatial strategy and distribution of new development is sound. unable to comment on whether the plan and proposed strategy has been positively prepared. We therefore consider the policy is not sound. The Green Belt Review fails to consider the exceptional circumstances associated with other parts of the plan strategy, namely, to protect existing established employment sites and enabling people access to jobs locally. Proposed changes to make the plan sound A review of the Green Belt and consider the potential for new and expanded employment sites in the west of the borough to reflect and support the housing strategy. We note that six potential employment sites were assessed to the south of Edlington at Stage 3 of the Green Belt review for completeness. the site to the east of Broomhouse Lane should be removed from the Green Belt. Proposed Employment Site site is open space and in the Green Belt removal of the site from the green belt would provide the potential for an extension to the existing Broomhouse Lane industrial estate to provide additional land for the expansion of the existing Polypipe business which is in situ on the estate. The removal of the site from the Green Belt would bring the settlement boundary in line with the southern extent of the boundary to the west. Strong defensible boundaries would be formed by the existing Edlington woodland to the south and east. The amendment to the Green Belt would enable a further employment allocation in the west of the borough to support and meet the needs of existing employers in this area. The provision of new sites in the west of the borough will provide choice and flexibility and ensure that existing businesses expand and remain in the area to support the housing growth strategy. A stable economy will ensure the inclusive and sustainable communities in the west of borough are maintained.

Response:
Noted. Support welcomed. A Settlement Background Paper was produced which supported the Publication Version of the Local Plan and was made available at the same time. It was also made available at the Informal Consultation stage. The Green Belt Topic Paper explains why there are no employment allocations within the Green Belt at this time i.e. it is considered that there are currently no exceptional circumstances. The explanatory text of Local Plan Policy 3 also explains that there is access to business parks across the border in Rotherham. These can be accessed using strong public transport links and road connectivity.
3.8. Draft Policy 2 sets out the preferred direction of housing to be developed over the plan period. The spatial strategy seeks to concentrate growth at the larger settlements of the Borough, where existing services and facilities are located so as to drive for sustainable housing developments. 3.9. We agree with focussing new homes in the Main Urban Areas followed by Doncaster’s 7 Main Towns and 10 Service Towns and Villages to make sure the plan is prepared with the objective of contributing to the achievement of sustainable development. In the interests of justified plan making and consistency with national policies. 3.10. We also welcome the new approach to development within the countryside and in doing so once adopted will replace the outdated ENV2 and ENV4 within the UDP. Point 5 of draft policy 2 specifically outlines the criteria which will support proposals for new development in the countryside. This is now in line with the new NPPF to make sure the plan is positively prepared and justified. 3.11. In principle we have no issue with the council’s approach to housing allocations, in that they should be the "most sustainable and deliverable urban and urban extension sites”. However we have concerns over the sites which have been selected not fulfilling the above criteria. A number of the sites selected are unviable. This will be discussed in detail under our comments for draft policy 6.

Recommendation 2: Ensure that a sustainable growth strategy is incorporated to guarantee consistency with DMBC’s aims and objectives and the NPPF in the interests of positive plan making. The plan should however ensure that all housing allocations are the most deliverable and can contribute to the supply of housing over the plan period in the interests of effective and justified plan making.

Summary:
Agree with focussing homes in the urban area, main towns and service towns / villages to make sure the plan contributes to achieving sustainable development. Also welcome the new approach to development in the countryside to replace ENV2 4. Point 5 of Policy 2 is now in line with the new NPPF to make sure the plan is positively prepared and justified. No issue in principle with the approach to housing allocations in that they should be the "most sustainable and deliverable urban and urban extension sites”, however concerns those selected do not fulfil the above criteria and a number are unviable. Recommendation 2: Ensure that a sustainable growth strategy is incorporated to guarantee consistency with DMBC’s aims and objectives and the NPPF in the interests of positive plan making. The plan should however ensure that all housing allocations are the most deliverable and can contribute to the supply of housing over the plan period in the interests of effective and justified plan making.

Response:
Support welcomed. The Local Plan seeks to allocate sites (including those with permission) which are deliverable. Deliverability is looked at through the HELAA as well as the '5 year Deliverable Housing Land supply Statement’ and Housing Topic Paper.
**Comment Ref:** C/Policy 2/05289/1/002

**Attend Examination:** Attend Hearing

**Reason:** We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

**Area:** Chapter 4: Strategic Approach

**Policy:** Policy 2: Spatial Strategy & Settlement Hierarchy

**Tests of Soundness:** Consistent with national

**Comment:**

The removal of safeguarded land within this policy is not supported by Persimmon Homes. While there is no definitive guidance indicating the amount of land which should be safeguarded, the National Planning Policy Framework (NPPF) (2019) is clear that where necessary Local Plans should ‘identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period’, and that local authorities should ‘be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period’. The evidence base document entitled Green Belt Topic Paper (2019) produced by Doncaster Metropolitan Borough Council (the Council) provides some explanatory text to support the exclusion of safeguarded land from the Local Plan. It does not, however, provide sufficient evidence that Green Belt boundaries will not need to be altered at the end of the plan period. This policy is therefore not compliant with the NPPF and is not justified, because it has not been demonstrated that the plan will provide a robust long-term Green Belt boundary nor certainty for residents and developers alike in terms of likely growth locations beyond the end of the plan period. The defined development limits outlined in this policy are also overly restrictive and unsound. Placing a blanket ban on residential development outside defined settlements apart from in exceptional circumstances or for rural exceptions is not consistent with national policy, which outlines that plans should be prepared with the objective of contributing to the achievement of sustainable development. Much of the land adjacent to the defined development limits is in sustainable locations which could contribute to meeting the housing need and provide sustainable development. The restriction imposed by such a policy may prevent the area from meeting its housing need. Proposals for development in these locations should not be required to demonstrate exceptional circumstances or clear local support in order to achieve support from the Council.

**Summary:**

Objects to the lack of safeguarded land between urban area and Green Belt. The Green Belt Topic Paper (2019) provides some justification but does not provide sufficient evidence that Green Belt boundaries will not need to be altered at the end of the Plan period. The defined development limits outlined in this policy are also overly restrictive and unsound. Placing a blanket ban on residential development outside defined settlements apart from in exceptional circumstances or for rural exceptions is not consistent with national policy, which outlines that plans should be prepared with the objective of contributing to the achievement of sustainable development. Much of the land adjacent to the defined development limits is in sustainable locations which could contribute to meeting the housing need and provide sustainable development. The restriction imposed by such a policy may prevent the area from meeting its housing need. Proposals for development in these locations should not be required to demonstrate exceptional circumstances or clear local support in order to achieve support from the Council.

**Response:**

The Local Plan does not propose to identify Safeguarded Land in the Green Belt for the reasons given in the Green Belt Topic Paper. The Local Plan proposes an appropriate strategy that steers development to the most sustainable locations taking into account Green Belt and existing countryside designations. Policy 2 introduces flexibility for permitting additional growth subject to meeting its conditional criteria. Development have been identified (according to a methodology that has been consulted upon) - to allow the identification of rational and robust boundaries which for the application of "Countryside" policy and identification of settlement boundaries within which development is prioritised. This supports the plan led approach to development.
Attend Examination: Attend Hearing

Reason: We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Area: Chapter 4: Strategic Approach
Policy: Policy 2: Spatial Strategy & Settlement Hierarchy

Tests of Soundness:

Consistent with national

Comment:
The removal of safeguarded land within this policy is not supported by Persimmon Homes. While there is no definitive guidance indicating the amount of land which should be safeguarded, the National Planning Policy Framework (NPPF) (2019) is clear that where necessary Local Plans should 'identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period', and that local authorities should 'be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period'. The evidence base document entitled Green Belt Topic Paper (2019) produced by Doncaster Metropolitan Borough Council (the Council) provides some explanatory text to support the exclusion of safeguarded land from the Local Plan. It does not, however, provide sufficient evidence that Green Belt boundaries will not need to be altered at the end of the plan period. This policy is therefore not compliant with the NPPF and is not justified, because it has not been demonstrated that the plan will provide a robust long-term Green Belt boundary nor certainty for residents and developers alike in terms of likely growth locations beyond the end of the plan period. The defined development limits outlined in this policy are also overly restrictive and unsound. Placing a blanket ban on residential development outside defined settlements apart from in exceptional circumstances or for rural exceptions is not consistent with national policy, which outlines that plans should be prepared with the objective of contributing to the achievement of sustainable development. Much of the land adjacent to the defined development limits is in sustainable locations which could contribute to meeting the housing need and provide sustainable development. The restriction imposed by such a policy may prevent the area from meeting its housing need. Proposals for development in these locations should not be required to demonstrate exceptional circumstances or clear local support in order to achieve support from the Council.

Summary:
Objects to the lack of safeguarded land between urban area and Green Belt. The Green Belt Topic Paper (2019) provides some justification but does not provide sufficient evidence that Green Belt boundaries will not need to be altered at the end of the Plan period. The defined development limits outlined in this policy are also overly restrictive and unsound. Placing a blanket ban on residential development outside defined settlements apart from in exceptional circumstances or for rural exceptions is not consistent with national policy, which outlines that plans should be prepared with the objective of contributing to the achievement of sustainable development. Much of the land adjacent to the defined development limits is in sustainable locations which could contribute to meeting the housing need and provide sustainable development. The restriction imposed by such a policy may prevent the area from meeting its housing need. Proposals for development in these locations should not be required to demonstrate exceptional circumstances or clear local support in order to achieve support from the Council.

Response:
The Local Plan does not propose to identify Safeguarded Land in the Green Belt for the reasons given in the Green Belt Topic Paper. The Local Plan proposes an appropriate strategy that steers development to the most sustainable locations taking into account Green Belt and existing countryside designations. Policy 2 introduces flexibility for permitting additional growth subject to meeting its conditional criteria. Development have been identified (according to a methodology that has been consulted upon) - to allow the identification of rational and robust boundaries which for the application of "Countryside" policy and identification of settlement boundaries within which development is prioritised. This supports the plan led approach to development.
Response:

Policy 2 of the DLP includes Finningley within Level 3 Service Towns and Villages. Our client's land interest however, lies outwith but adjacent to Finningley's development limits, as identified on the Policy Map, thus within the designated Countryside. This is despite it being largely a brownfield site. For the reasons set out in this representation, when read as a whole, it is our firm view that the development limits of Finningley should be revised to include our client's land interest (HELAA site 317) and that the site should be allocated for housing. Turning to the wording of Policy 2 (Spatial Strategy and Settlement Hierarchy), as currently drafted this is not consistent with the National Planning Policy Framework (NPPF). Criterion 5 of Policy 2 sets out that residential development will be supported in the Countryside if adjacent to a Development Limit of a settlement in the Main Urban Area, Main Towns or Service Towns/Villages but excludes development within Defined Villages. This is contrary to the NPPF which supports sustainable development in suitable locations. Whilst Defined Villages are positioned at the bottom of the defined settlement hierarchy this should not inhibit development within the Countryside if adjacent to a Development Limit. This criterion should therefore be reworded as follows: "Residential development will also be supported in the Countryside if adjacent to a Development Limit of a settlement as outlined above in levels 1-3 above, where?" Criterion 5E notes that residential development in the Countryside will only be supported where a five-year borough-wide supply of housing land cannot be demonstrated and the development would make a significant contribution to housing land supply. The NPPF supports sustainable development and whilst consideration of 5-year housing land supply may be an attribute which weighs into this consideration, there is no requirement for demonstration of a lack of a 5YHLS for development within the Countryside to be acceptable. NPPF paragraph 73 requires LPAs to be able to demonstrate a 5YHLS at all times as a minimum therefore waiting until this has occurred before releasing sustainable sites that would comply with the other criteria of part 5 is not positive and would be contrary to the NPPF. Sustainable sites that comply with part 5 should be released to ensure that supply remains above 5 years and/or 920 dwellings per annum (dpa). Criterion 5E should therefore be deleted in its entirety. The development limits outlined in the DLP presents a notion of controlling the location of development, which is a restrictive approach that is at odds with the NPPF. The NPPF directs that Local Plans should "provide a positive vision for the future of each area?" (NPPF paragraph 15). If development limits are proposed, their role should be to help direct development needed to the right places; providing sufficient flexibility to accommodate development needs not currently anticipated (NPPF paragraph 81). By including development limits to control development, the DLP conflicts with the NPPF (paragraph 16) which requires that Local Plans are "prepared positively, in a way that is aspirational but deliverable?". Whilst the NPPF expects Local Plans to identify land where development would be inappropriate and does not explicitly preclude the inclusion of settlement boundaries or development limits, it does not specify that Local Plans define settlement boundaries and does not instruct Local Plans to preclude development at the edge of a settlement. Rather, the NPPF simply supports sustainable development. The tightly drawn development limits around Finningley, designating our client's site, which is largely brownfield land (previously used for distribution and manufacturing, recycling and storage of construction waste and materials, and storage of construction plant), as countryside, restricts development to an extent that is at odds with the NPPF's presumption of sustainable development. Should development limits remain, the development limit of Finningley should be revised to include our client's land, which is largely brownfield land, adjacent to existing (or consented) residential development in a sustainable location. This would help achieve the NPPF's objective that Local Plans are based on robust evidence of development need with a buffer to provide sufficient flexibility. Furthermore, we note that there is a tension between part 5 of Policy 2 (Spatial Strategy and Settlement Hierarchy) and Policy 26 (Development in the Countryside) in that they set out different requirements for development within the Countryside but lack clarity between the difference in consideration of edge of settlement sites and those located in isolated locations within the Countryside. The policies and their supporting text should be amended to make clear the difference between development proposals on the edge of sustainable settlements (Policy 2) and requirements for development in isolated areas of the Countryside (Policy 26).

Summary:

- Policy 2 - Spatial Strategy and Settlement Hierarchy: 1. Site 317 (countryside) should be included within the development limits of Finningley. 2. Policy wording not consistent with the NPPF. Criterion 5 1. Should be amended to support residential development in Countryside adjacent to a 'Development Limit' of a settlement. 2. Criterion 5E should be deleted. Not compatible with the NPPF (para 73) in respect of the 5 year supply. 3. Imposing development limits is restrictive and at odds with the NPPF (para 15/1681). 4. Excluding site 317 which is BF is at odds with NPPF presumption of sustainable development. 5. Tension between Policies 2 (part 5) and Policy 26. Should be made clear difference between development on the edge of a sustainable settlement and requirements in isolated areas.

Response:

Policy 3 provides further policy in respect to growth to the Countryside Defined Villages outside of development limits. Development limits have been reviewed in line with the methodology which has been subject itself to consultation. It is not considered that there is a tension between Part 5 of this policy and Policy 26 (Countryside).
2.1 This section refers to relevant strategic policies in the Publication Draft Plan, notably Policy 2: Spatial Strategy and Settlement Hierarchy and Policy 3: Level and Distribution of Growth. 2.2 We support the approach to the spatial strategy set out in Policy 2 that seeks to distribute employment development across the Borough, with a focus on the defined 'Main Towns', such as Thorne and Moorends, as well as those areas that are attractive to the market and with good access to the Strategic Transport Network. 2.3 As identified within the plan's supporting text, it is important that the Local Plan identifies employment allocations across not just the main urban area, but also the Main Towns, in order to ensure that regeneration benefits are spread across the Borough. It is appropriate that Thorne and Moorends is identified as a Main Town, being one of the larger settlements outwith the urban area with a significant population, available workforce and a wide range of existing services. 2.4 Particular support is also given to focussing employment sites within accessible and attractive market locations, which is necessary to ensure that the spatial strategy is effective and deliverable. 2.5 As set out in further detail below, Site 001: Thorne North comprises such a site, being located outside the main urban area but accessible to the Main Town of Thorne and Moorends and its associated population/workforce, whilst also comprising a well located site with excellent access to the strategic transport network and is attractive to the market. The presence of Site 001 therefore demonstrates that sites which accord with the spatial strategy are available to enable the spatial strategy set out in Policy 2 to be brought forward, and that DMBC is justified in adopting this approach. 2.6 The approach adopted by Policy 2 is therefore considered to be justified, effective (deliverable) and positively prepared, and is therefore sound.

Summary:

Support the Spatial Strategy set out in Policy 2 which has a focus on the defined 'Main Towns' such as Thorne and Moorends, as well as those areas that are attractive to the market and with good access to the Strategic Transport Network. Particular support is given to focussing employment sites within accessible and attractive market locations which is necessary to ensure that the spatial strategy is effective and deliverable. Thorne North (Site 001) is such a site. It is outside the main urban area but accessible to the main town of Thorne and Moorends and its associated population/workforce. It is well located with excellent access to the strategic transport network and is attractive to the market. Site 001 demonstrates that sites which accord with the spatial strategy are available and that DMBC is justified in adopting the approach to the spatial strategy. The approach adopted by Policy 2 is justified, effective (deliverable) and positively prepared, and is therefore sound.

Response:
Noted. Support welcomed.
6.1 This section reviews other draft policies in the emerging Local Plan which are relevant to major housing development. 6.2 Draft Policy 2 sets out that residential development will be supported in the Countryside if adjacent to a Development Limit of a settlement in levels 1-3 and will meet a number of criteria. As drafted, Don Parkinson considers that the policy is unsound and not positively prepared or justified. It is considered that the Council should consider unallocated sites which may come forward during the plan period which are considered to be sustainable development. Part 5e is considered to be unduly onerous and is totally unjustified. As drafted it restricts any unallocated development which is found to be sustainable, the NPPF is clear that five year supply and proposed allocations should identify a minimum of housing. 6.3 Furthermore, it is considered that the Development Limits of Thorne should be amended to include the subject site (Sites 002,003, 004 and 005). 6.4 Draft Policy 26 sets out that planning permission for new dwellings within the Countryside will be granted for dwellings to meet the essential needs of agriculture, forestry, or other enterprise which justifies a rural location (which also meets a range of criteria). The policy does not take into account that some areas of Countryside identified on the policies map is located adjacent to Main Towns which are more urban in character than rural. The policy should be amended to support the delivery of unallocated housing sites which may come forward within such areas. 6.5 Don Parkinson considers that draft Policy 2 and 26 as drafted is unsound and not effective or justified. The Council should seek to amend the policies as discussed above.

Response:
Criterion 5E is considered appropriate in the context of an up-to-date local plan with sufficient allocations being made for the plan period with numerous sources of additional housing supply and the government’s emphasis on having a plan-led approach. That said, should circumstances change during the plan period then the policy provides flexibility to bring forward a further source of supply and will assist ensuring that any such proposals come forward with some policy to help bring forward sustainable extensions to settlements with a Countryside boundary. Development limits have been reviewed in line with the methodology which has been subject itself to consultation. Policies 2 and 3 sufficiently cover development adjacent to settlements in the eastern Countryside ‘half’ of the borough.
C/Policy 2/05295/1/009

Attend Examination: Attend Hearing

Reason: To fully represent our clients land interest and respond to matters that may be raised at the hearing sessions. Please refer to accompanying representation 'Doncaster Local Plan Representations to Draft Doncaster Local Plan - Publication Draft' (September 2019) on behalf of Don Parkinson Partnership (doc ref. 60752/01/JG/AK).

Area: Chapter 4: Strategic Approach

Policy: Policy 2: Spatial Strategy & Settlement Hierarchy

Tests of Soundness: Positively prepared

Justified

Effective

Legally Compliant

Consistent with national

Comment:

6.1 This section reviews other draft policies in the emerging Local Plan which are relevant to major housing development. 6.2 Draft Policy 2 sets out that residential development will be supported in the Countryside if adjacent to a Development Limit of a settlement in levels 1-3 and will meet a number of criteria. As drafted, Don Parkinson considers that the policy is unsound and not positively prepared or justified. It is considered that the Council should consider unallocated sites which may come forward during the plan period which are considered to be sustainable development. Part 5e is considered to be unduly onerous and is totally unjustified. As drafted it restricts any unallocated development which is found to be sustainable, the NPPF is clear that five year supply and proposed allocations should identify a minimum of housing. 6.3 Furthermore, it is considered that the Development Limits of Thorne should be amended to include the subject site (Sites 002,003, 004 and 005). 6.4 Draft Policy 26 sets out that planning permission for new dwellings within the Countryside will be granted for dwellings to meet the essential needs of agriculture, forestry, or other enterprise which justifies a rural location (which also meets a range of criteria). The policy does not take into account that some areas of Countryside identified on the policies map is located adjacent to Main Towns which are more urban in character than rural. The policy should be amended to support the delivery of unallocated housing sites which may come forward within such areas. 6.5 Don Parkinson considers that draft Policy 2 and 26 as drafted is unsound and not effective or justified. The Council should seek to amend the policies as discussed above.

Summary:

Policy 2: This Policy is unsound and not positively prepared or justified. The Council should consider unallocated sites which may come forward during the plan period which are considered to be sustainable development. Part 5e is unduly onerous and is totally unjustified. It currently restricts any unallocated development that is sustainable. The NPPF is clear that a five year supply and proposed allocations should identify a minimum of housing. The development limits of Thorne should be amended to include the subject site (Sites 002,003, 004 and 005). Policy 26: is unsound and not effective or justified. This policy does not take into account that some areas of Countryside identified on the policies map are located adjacent to Main Towns which are more urban in character than rural. The policy should be amended to support the delivery of unallocated housing sites which may come forward within such areas.

Response:

Criterion 5E is considered appropriate in the context of an up-to-date local plan with sufficient allocations being made for the plan period with numerous sources of additional housing supply and the government’s emphasis on having a plan-led approach. That said, should circumstances change during the plan period then the policy provides flexibility to bring forward a further source of supply and will assist ensuring that any such proposals come forward with some policy to help bring forward sustainable extensions to settlements with a Countryside boundary. Development limits have been reviewed in line with the methodology which has been subject itself to consultation. Policies 2 and 3 sufficiently cover development adjacent to settlements in the eastern Countryside ‘half’ of the borough.
Comment Ref: C/Policy 2/05296/1/009

Attend Examination: Attend Hearing

Reason: To fully represent our clients land interest and respond to matters that may be raised at the hearing sessions. Please refer to accompanying representation 'Doncaster Local Plan Representations to Draft Doncaster Local Plan - Publication Draft' (September 2019) on behalf of Don Parkinson Partnership (doc ref. 60752/01/JG/AK).

Area: Chapter 4: Strategic Approach

Policy: Policy 2: Spatial Strategy & Settlement Hierarchy

Tests of Soundness: Positively prepared Justified Effective Consistent with national Legally Compliant

Comment:

6.1 This section reviews other draft policies in the emerging Local Plan which are relevant to major housing development. 6.2 Draft Policy 2 sets out that residential development will be supported in the Countryside if adjacent to a Development Limit of a settlement in levels 1-3 and will meet a number of criteria. As drafted, Don Parkinson considers that the policy is unsound and not positively prepared or justified. It is considered that the Council should consider unallocated sites which may come forward during the plan period which are considered to be sustainable development. Part 5e is considered to be unduly onerous and is totally unjustified. As drafted it restricts any unallocated development which is found to be sustainable, the NPPF is clear that five year supply and proposed allocations should identify a minimum of housing. 6.3 Furthermore, it is considered that the Development Limits of Thorne should be amended to include the subject site (Sites 002,003, 004 and 005). 6.4 Draft Policy 26 sets out that planning permission for new dwellings within the Countryside will be granted for dwellings to meet the essential needs of agriculture, forestry, or other enterprise which justifies a rural location (which also meets a range of criteria). The policy does not take into account that some areas of Countryside identified on the policies map is located adjacent to Main Towns which are more urban in character than rural. The policy should be amended to support the delivery of unallocated housing sites which may come forward within such areas. 6.5 Don Parkinson considers that draft Policy 2 and 26 as drafted is unsound and not effective or justified. The Council should seek to amend the policies as discussed above.

Summary:

Policy 2: This Policy is unsound and not positively prepared or justified. The Council should consider unallocated sites which may come forward during the plan period which are considered to be sustainable development. Part 5e is unduly onerous and is totally unjustified. It currently restricts any unallocated development that is sustainable. The NPPF is clear that a five year supply and proposed allocations should identify a minimum of housing. The development limits of Thorne should be amended to include the subject site (Sites 002,003, 004 and 005). Policy 26: is unsound and not effective or justified. This policy does not take into account that some areas of Countryside identified on the policies map are located adjacent to Main Towns which are more urban in character than rural. The policy should be amended to support the delivery of unallocated housing sites which may come forward within such areas.

Response:

Criterion 5E is considered appropriate in the context of an up-to-date local plan with sufficient allocations being made for the plan period with numerous sources of additional housing supply and the government’s emphasis on having a plan-led approach. That said, should circumstances change during the plan period then the policy provides flexibility to bring forward a further source of supply and will assist ensuring that any such proposals come forward with some policy to help bring forward sustainable extensions to settlements with a Countryside boundary. Development limits have been reviewed in line with the methodology which has been subject itself to consultation. Policies 2 and 3 sufficiently cover development adjacent to settlements in the eastern Countryside ‘half’ of the borough.
Comment Ref: C/Policy 2/05297/1/009

Attend Examination: Attend Hearing

Reason: To fully represent our clients land interest and respond to matters that may be raised at the hearing sessions. Please refer to accompanying representation 'Doncaster Local Plan Representations to Draft Doncaster Local Plan - Publication Draft' (September 2019) on behalf of Don Parkinson Partnership (doc ref. 60752/01/JG/AK).

Area: Chapter 4: Strategic Approach

Policy: Policy 2: Spatial Strategy & Settlement Hierarchy

Tests of Soundness:

- Positively prepared
- Effective
- Legally Compliant
- Justified
- Consistent with national

Comment:

6.1 This section reviews other draft policies in the emerging Local Plan which are relevant to major housing development. 6.2 Draft Policy 2 sets out that residential development will be supported in the Countryside if adjacent to a Development Limit of a settlement in levels 1-3 and will meet a number of criteria. As drafted, Don Parkinson considers that the policy is unsound and not positively prepared or justified. It is considered that the Council should consider unallocated sites which may come forward during the plan period which are considered to be sustainable development. Part 5e is considered to be unduly onerous and is totally unjustified. As drafted it restricts any unallocated development which is found to be sustainable, the NPPF is clear that five year supply and proposed allocations should identify a minimum of housing. 6.3 Furthermore, it is considered that the Development Limits of Thorne should be amended to include the subject site (Sites 002,003, 004 and 005). 6.4 Draft Policy 26 sets out that planning permission for new dwellings within the Countryside will be granted for dwellings to meet the essential needs of agriculture, forestry, or other enterprise which justifies a rural location (which also meets a range of criteria). The policy does not take into account that some areas of Countryside identified on the policies map is located adjacent to Main Towns which are more urban in character than rural. The policy should be amended to support the delivery of unallocated housing sites which may come forward within such areas. 6.5 Don Parkinson considers that draft Policy 2 and 26 as drafted is unsound and not effective or justified. The Council should seek to amend the policies as discussed above.

Summary:

Policy 2: This Policy is unsound and not positively prepared or justified. The Council should consider unallocated sites which may come forward during the plan period which are considered to be sustainable development. Part 5e is unduly onerous and is totally unjustified. It currently restricts any unallocated development that is sustainable. The NPPF is clear that a five year supply and proposed allocations should identify a minimum of housing. The development limits of Thorne should be amended to include the subject site (Sites 002,003, 004 and 005). Policy 26: is unsound and not effective or justified. This policy does not take into account that some areas of Countryside identified on the policies map are located adjacent to Main Towns which are more urban in character than rural. The policy should be amended to support.

Response:

Criterion 5E is considered appropriate in the context of an up-to-date local plan with sufficient allocations being made for the plan period with numerous sources of additional housing supply and the government's emphasis on having a plan-led approach. That said, should circumstances change during the plan period then the policy provides flexibility to bring forward a further source of supply and will assist ensuring that any such proposals come forward with some policy to help bring forward sustainable extensions to settlements with a Countryside boundary. Development limits have been reviewed in line with the methodology which has been subject itself to consultation. Policies 2 and 3 sufficiently cover development adjacent to settlements in the eastern Countryside ‘half’ of the borough.
Comment Ref: C/Policy 2/05299/1/002

Name: Jennifer Hubbard Town Planning Consultant
Organisation: Jennifer Hubbard Town Planning Consultant
Representing: John Burley Investments LTD

Date: 30/09/2019

Comment:
The Spatial Strategy and Settlement Hierarchy (Policy 2) is supported, particularly the definition of the Doncaster main urban area (MUA). The distribution of new housing as between housing allocations and mixed use allocations to meet local needs housing growth and economic-lead housing growth and the clear explanation of the justification for this is in our view a sound approach to achieving sustainable patterns of development. The definition of the Doncaster MUA on the Proposals Map has been the subject of some criticism particularly from outlying communities which are considered to have separate identities from Doncaster itself. Whilst this local view is to some extent understandable, it does not reflect the reality on the ground. It is simply not possible to identify - for example - where "Doncaster" ends and "Warmsworth" begins. However, inclusion of these outlying communities within the Doncaster MUA does not mean that the communities themselves, whether or not they include Parish Councils, cannot continue to influence the details of any development which may occur as a result of Local Plan policies. Concentrating the bulk of new development in the Doncaster MUA as defined will result in a more sustainable pattern of development than would occur with a more dispersed housing distribution and should assist in the regeneration of Doncaster town centre. Consistent with other Local Plan policies. It will also reduce pressure on the green belt whilst allowing a wide range of rural settlements to grow in a manner proportionate to their existing size and character. Policy 2(5) Countryside and the associated Policies 3 and 26 together provide what is, in the writer's view, an exceptional approach, which should be supported, providing flexibility consistent with the NPPF and with the Council's objective of boosting employment and associated housing. The policy, rightly, includes environmental and other technical caveats (e.g. flood risk) and expects proposals that come forward under this policy to have local support. Flexibility is further embedded in the Plan through the inclusion of Reserve (housing) sites. The Plan correctly, in our view, does not repeat NPPF policy (e.g. in relation to flood risk and green belt) other than where there is a need for more detail than the Framework provides. This, too, is to be welcomed.

Area: Chapter 4: Strategic Approach
Policy: Policy 2: Spatial Strategy & Settlement Hierarchy

Tests of Soundness: 

Summary:

Response:
Support for Local Plan and Policies is noted.
Policy 2 of the Publication Local Plan sets out that, 'The openness and the permanence of Doncaster’s Green Belt will be preserved. The general extent of the Green Belt will be retained. Within the Green Belt, national planning policy will be applied including the presumption against inappropriate development except in very special circumstances'. The former Doncaster College Site at High Melton is currently washed over by Green Belt. There is opportunity for the Development Plan to accurately reflect the future intentions for the site and it is considered that the site could be allocated under its own Special Policy Area within the Local Plan. Alternatively it could be identified as a major developed site in the Green Belt. We therefore object to the current designation of the site within the Green Belt with a view to making progress with Doncaster MBC (DMBC) and Sheffield City Region (SCR) in securing the redevelopment of the site, which would be assisted by a positive planning policy context. It is understood that great importance is attached to Green Belts, with the fundamental aim to prevent urban sprawl by keeping land permanently open and therefore Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. However, strategic policies within the Doncaster Local Plan should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. In order to best facilitate the proposed investment at High Melton it is considered that an appropriate planning policy framework should reflect the proposals being prepared for the land, which are supported by DMBC and SCR due to their regional and national significance. In this instance the requirements of paragraph 137 of the National Planning Policy Framework ('Framework') can be demonstrated as having been met as the proposed allocation site is: a) a brownfield site, currently vacant and underutilised; b) would be an efficient use of land based on its proposed development as a Creative Media Industries Hub and Housing; and c) the development part of the High Melton Golf Course is essential in a single location in order that a critical mass of expertise and facilities is provided in a single location. Dispersal over a wider range of neighbouring authorities would not be an appropriate means by which to deliver the development or the significant social and economic benefits that come from such a use and the environmental benefits of delivering regeneration of a brownfield site. The proposed Special Policy Area allocation or Major Developed Site in the Green Belt designation performs poorly against the purposes of the Green Belt and is assessed against the five purposes (para 134 of the Framework) as follows; a) the site does not act to check the unrestricted sprawl of large built-up area. High Melton is not a large built up area and the brownfield nature of the site demonstrates that development has extended beyond the settlement envelope limits in the past with that relationship now being well established; b) the site is not, by virtue of its location, preventing neighbouring towns merging into one another. The nearest settlements are the village of Cadby 1.2 km to the south and Sprotborough 2.4 km to the east. The development of this site will not reduce these distances. This is not considered a material function of the land within the Green Belt in this instance; c) to assist in safeguarding the countryside from encroachment is not a function in this instance due to the brownfield nature of the site and that development has extended beyond the settlement envelope limits already. This has effectively established the nature of this area of land as being one of a major developed site in the Green Belt; d) whilst there are listed buildings within the vicinity of the site and their setting is protected, the Green Belt designation is not required to preserve the setting and special character of High Melton as a historic town. The listed building designations and Conservation Area boundaries and the protection afforded the setting of such heritage assets performs this function; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land, release of the site from the Green Belt as part of a Special Policy Area designation would achieve this and allow appropriate redevelopment of a brownfield site. The need to promote sustainable patterns of development should be taken into account in deciding to review the Green Belt in this location. The discussions between 360 Degree Media and the Council to date have demonstrated that this location is essential to the delivery of the Creative Media Hub. There would of course be the opportunity to mitigate the impact of the development as part of any further planning application, or indeed as a consequence of the decision to remove the land from the Green Belt through compensatory improvements to the environmental quality and accessibility of the site boundaries and wider retained open land as part of any proposed scheme. There is a significant opportunity to meet the economic investment objectives of the plan, as set out in Strategic Objective 2 and Policies 3, 4 and 5 of the Draft Plan for upskilling of work force through supporting development on this site. As previously noted, the land is not necessary to continue the function of the Green Belt in this location. The Green Belt boundaries can, through an appropriate process of development of the site proposals, be clearly set using physical features that are readily recognisable and are likely to be permanent beyond the plan period. Recommendation The site should be given its own Special Policy Area and the policies map updated to reflect this and with the Former Doncaster College Site removed from the Green Belt. Alternatively, the site should be reallocated as a 'Major Developed Site within the Green Belt' in order to ensure the policy is reflective of the Framework, which requires that strategic policies “make as much use as possible of suitable brownfield sites and underutilised land” (Paragraph 137). It is also recommended that to reflect this Special Policy Area, specific reference is made within the Green Belt section of Policy 2 to the redevelopment of this site at Creative Media Industries. Specific reference is made in Policy 3 to the site as an opportunity to secure investment in the Creative Industries: at Policy 4 reference is made to employment generation from Special Policy Area designation and articulated in Table 4 of the Local Plan. Justification The principle of the development of this site for Creative Media Industries, with an element of housing, has been subject to discussions with the Council who are supportive of the proposals due to the significant skills and economic benefits that the development will have for the Borough and wider economic area. This new development opportunity has already been acknowledged in Table 1 of Page 12 of the Publication Local Plan, but it is recommended that acknowledgement is made within Policy 2 itself. Paragraph 134 of the
National Planning Policy Framework sets out that Green Belt serves five purposes: a) To check the unrestricted sprawl of large built-up areas; b) To prevent neighbouring towns merging into one another; c) To assist in safeguarding the countryside from encroachment; d) To preserve the setting and special character of historic towns; and e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. In respect to the proposed development of this and the five purposes of the Green Belt it is highlighted that the site will not result in the unrestricted sprawl of a large built-up area and will primarily result in the development of brownfield land. The site will not result in neighbouring towns merging into one another. The development will not encroach into the countryside any further than that of the existing built form and manicured landscape. The redevelopment of this site will help to secure the long-term future of the heritage assets on site and will be designed sensitively to respect the character of the historic parks and gardens. The development proposals for this site will assist in the regeneration of this site by redeveloping brownfield land. The site therefore performs poorly against the functions of the Green Belt and it should be allocated to reflect its previously developed nature and the forthcoming development proposals. A planning application is to be formally submitted imminently, and it is requested that the Policies Map and Policy 2 of the Local Plan are updated to reflect the nature of the emerging proposals, which have the benefit of support from the Sheffield City Region and Doncaster Metropolitan Borough Council.

Summary:
Re former High Melton College site. Land use allocation. o Objects to site being kept as part of the Greenbelt and Parks and gardens of Local Historic Interest. o Site should be allocated as its own 'Special Policy Area' or 'Major Developed Site in the Greenbelt'. o Re classification would assist the re development of the site by way of a "positive planning policy context" o The scheme is a regionally and nationally significant proposal. o Scheme is a significant economic opportunity and should be treated as such. Removal from Greenbelt o The site meets the criteria set out in NPPF para 137 (changes to Greenbelt boundary) o Any impacts would be mitigated against through the planning application process. o Land is not necessary to continue the function of the GB. Policy 2 - Spatial strategy and Settlement Hierarchy o Reference should be made in the Greenbelt section (6) to re-development of the site for 'Creative Media Industries'.

Response:
The scale of development being proposed and nature and extent of existing buildings do not warrant a specific designation ? can be addressed through current policy
Policy 2 states: “New development (including homes, supporting services and associated jobs) will be focussed in and around existing urban areas (primarily Doncaster’s ‘Main Urban Area’, its 7 ‘Main Towns’ and 10 ‘Service Towns and Villages’).” 2.2 Askern is designated as a Service Town and Village within Policy 2. It is considered that this is an appropriate designation. 2.3 Policy 2 also states that: “At least 50% of new homes will go to the ‘Main Urban Area’, approximately 40% to the ‘Main Towns’ and about 10% to the ‘Service Towns and Villages’.” 2.4 The delivery of the site adjacent Askern Saw Mill will support this policy objective. This site currently benefits from outline planning permission for a mixed use scheme comprising of the erection of up to 220 dwellings, Use Class A1/A3/A5 use and Use Class B1(c) and B2 use (ref: 08/01077/OUTA). A subsequent reserved matters application is currently awaiting a decision which details access, appearance, landscaping, layout and scale for mixed use redevelopment of land (ref: 16/01651/REMM). 2.5 In addition, Policy 2 states that: “Housing allocations and mixed-use allocations to accommodate economic-led housing growth are directed to the most sustainable and deliverable urban and urban extension sites in the Doncaster Main Urban Area and Main Towns in accordance with the growth ranges set out in Policy 3 and in accordance with a sequential approach to flood risk.” 2.6 We object to no development being focussed within Service Towns and Villages. 2.7 The sustainability character of the site is set out in full in Section 3 of this report. Recommendation 2.8 The Council should identify the site as a specific location to accommodate further housing and employment growth in Policy 2 as part of the overall strategy. 2.9 It is further recommended that the site is specifically identified for Green Belt release in part 6) of the policy. Justification 2.10 As provided in more detail in Section 3, the site is sustainably located and therefore suitable for housing and employment use. In addition, given the location of the site immediately adjacent to Askern Saw Mills, High Street, Askern which currently has outline permission. The site would form a logical extension to this allocated mixed use site and round off the development.

Summary:

Policy 2: Spatial Strategy and Settlement Hierarchy 1. Agree with Askern being a service town. 2. Object to development focus being on Main Urban Area, should include service towns. 3. Part (6) site should be identified as a GB release site.

Response:

The Local Plan proposes an appropriate settlement hierarchy and whilst alternative distributions have been suggested by others that proposed in the Local Plan is considered the most appropriate. As set out in the Housing Topic Paper and Green Belt Topic Paper, no additional sites are required in Askern as the settlement can meet and surpass its housing targets, and there are no exceptional circumstances to justify any Green Belt release here.
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<th>Comment Ref:</th>
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<td>Reason:</td>
<td>To provide a full explanation of our points and address issues raised by the Council, Inspector or other participants.</td>
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<tr>
<td>Area:</td>
<td>Chapter 4: Strategic Approach</td>
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<td>Policy:</td>
<td>Policy 2: Spatial Strategy &amp; Settlement Hierarchy</td>
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**Tests of Soundness:**

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**Comment:**

3.1 This policy is considered unsound as it is not justified or effective. 3.2 The policy seeks to distribute the majority of new development to the most sustainable locations, these being the Main Urban Area of Doncaster, the 7 Main Towns and the 10 Service Towns and Villages. This general principal is considered appropriate and is supported. It is, however, important that this is sustainable and deliverable. 3.3 Tickhill is identified as in the 'Service Towns and Villages' category. The identification of Tickhill within the Service Town and Village tier is supported. It is a high performing settlement and provides many primary services. It is well served by a district centre containing local services and amenities, two primary schools and health care provision. 3.4 In terms of new homes the policy seeks to deliver at least 50% within the 'Main Urban Area' of Doncaster and 40% within the 7 'Main Towns' with just 10% allocated to the 'Service Towns and Villages'. The lack of housing allocated to Service Towns and Villages is disproportionately low and takes no account of the sustainability, deliverability, development opportunities or affordable housing need.

**Summary:**

Consider policy 2 unsound as it is not justified or effective. Generally support main principle of policy however its important that its sustainable and deliverable.  Tickhill is a Service Town and Village, and a high performing settlement providing many primary services however only allocated 10% of the borough distribution of new homes which is disproportionately low and takes no account of sustainability deliverability development opportunities or affordable housing need.

**Response:**

Tickhill has been allocated a housing requirement which is reflective of its size and service provision, and in line with other similar sized settlements. The approach is further explained in the Housing Topic Paper.
Summary of the Spatial Strategy and Settlement Hierarchy 4.8 The overall strategy seeks to concentrate growth at the larger settlements of the Borough with remaining growth delivered elsewhere to support the function of other sustainable settlements with growth distribution appropriate and proportionate to the size of the existing settlements. New development is to be focused in and around existing urban areas (primarily Doncaster’s Main Urban Area, its 7 Main Towns and 10 Service Towns and Villages). 4.9 The Policy seeks to ensure that development helps to create and maintain, sustainable, cohesive and inclusive communities, making use of existing transport corridors and infrastructure to enable people to access jobs, services and facilities locally. 4.10 Up to 50% of housing is to be focussed on the Main Urban Area, with 40% in Main Towns and 10% in Service Towns and Villages. 4.11 With regards to new employment sites these are to be focused in locations that are accessible from the Main Urban Area and Main Towns and in locations attractive to the market with good access to the Strategic Network and Doncaster Sheffield Airport. 4.12 The second part of the policy sets out the settlement hierarchy as: - Doncaster Main Urban Area - Main Towns - Service Towns and Villages - Defined Villages - Countryside - Green Belt. 4.13 The ten service towns and villages include Edlington. The policy states that the service towns and villages will be a focus for accommodating housing, employment, retail and key services growth to meet their local needs, as well as growth to renew and regenerate any run down neighbourhoods. 4.14 The Strategy is informed by a Settlement Audit of service provision across the Borough and seeks to provide growth proportionate to the existing pattern of development. The explanation for this strategy is to be provided in a Topic Paper which is not currently available. 4.15 Part 6 of the policy relates to the Doncaster Green Belt which is identified on the policies Map. 4.16 The policy states that within the Green Belt, National Planning policy will be applied including the presumption against inappropriate development except in very special circumstances. Soundness of the Spatial Strategy and Distribution of New Development 4.17 We support the general approach of Policy 2, however in the absence of the Settlement Topic Paper we are unable to comment as to whether the spatial strategy and distribution of new development is sound. We are therefore unable to comment on whether the plan and proposed strategy has been positively prepared. We therefore consider the policy is not sound. 4.18 In addition we object to the proposed Green Belt. We do not consider the review of the Green Belt has been positively prepared. We therefore consider the policy is not sound. Reasoning Green Belt Topic Paper 4.19 The Green Belt boundaries have been informed by the Green Belt Review. The text box accompanying Paragraph 4.13 of the Plan states that the Green Belt Topic Paper explains the approach taken in considering the need to release land from the Green Belt. 4.20 Paragraph 2.1.9 of the paper states that national planning policy is clear that the release of land from the Green Belt must be fully justified and only undertaken once a number of tests have been met to prove the case that exceptional circumstances exist for releasing land. 4.21 As a result, the Paper considers housing and employment land separately. The paper refers to the Plan Strategy and states that the emphasis of the housing strategy is that need will be met in the most sustainable locations with more housing being allocated towards the main urban area and seven main towns as the most sustainable locations for growth. 4.22 For employment sites, the paper states that the focus within the Plan is on people being able to travel from home to workplaces and as such sites do not need to be found within specified settlements to meet a strategy (as per housing) and that employment land is based on factors including marketability and location (Para 2.1.11). 4.23 The Green Belt review therefore concludes that there are no exceptional circumstances for releasing Green Belt land for employment purposes in Doncaster as the focus is not on allocating sites in settlements, rather allocating sites in the best locations across the Borough based on criteria including market demand, location and access to the motorway. 4.24 However, at paragraph two of Policy 2, the strategy states that (our underlining); Development should help create and maintain strong, sustainable, cohesive and inclusive communities making the most effective use of previously developed land and the best use of key transport corridors and existing infrastructure, enabling people to access jobs, services and facilities locally. 4.25 The policy continues to state that new development will be focussed in and around existing urban areas, main town and service towns and villages. Reference is made to Major new employment sites and that these will be focussed in locations accessible from the main urban area and main towns in locations attractive to the market with good access to the strategic transport network and Doncaster Sheffield Airport. 4.26 Reference is made to Policy 3 in the supporting text which we comment on separately. 4.27 Overall it is considered that the conclusion that there are no exceptional circumstances for releasing Green Belt land focuses on the delivery of major employment sites associated with the M18 and airport which can be delivered on sites outside the Green Belt. 4.28 The Green Belt review fails to consider the exceptional circumstances associated with other parts of the plan strategy, namely, to protect existing established employment sites and enabling people access to jobs locally. 4.29 There are a number of existing employment sites in the west of the borough and as stated in the strategy development should maintain strong sustainable, cohesive and inclusive communities. 4.30 Taking into account the evidence of existing live work patterns, it is therefore necessary to acknowledge that the housing and employment strategies have to overlap to ensure the plan can be effective. 4.31 The release of Green Belt land to enable housing growth in the main towns and service towns and villages should be met with sufficient land to maintain existing employment opportunities. The allocation of an employment site in the north in addition to those on the M18 corridor, does not provide a good spread. Proposed changes to make the plan sound 4.32 A review of the Green Belt should be carried out to consider the potential for new and expanded employment sites in the west of the borough to reflect and support the housing strategy. 4.33 We note that six potential employment sites were assessed to the south of Edlington at Stage 3 of the Green Belt review for completeness. 4.34 It is considered that the site to the east of Broomhouse Lane adjoining in the existing employment allocation should be considered for removal from the Green Belt. Proposed Employment Site 4.35 The site is currently allocated as open space and included in the Green Belt. The
Provides a summary of Policy 2 and Local Plan Spatial Strategy and Settlement Hierarchy... which provides for 'up to 50% of housing is to be focussed on the Main Urban Area, with 40% in Main Towns and 10% in Service Towns and Villages'.

ten service towns and villages include Edlington and the policy states that the service towns and villages will be a focus for accommodating housing, employment, retail and key services growth to meet their local needs, support the general approach of Policy 2. but in the absence of the Settlement Topic Paper we are unable to comment as to whether the spatial strategy and distribution of new development is sound. unable to comment on whether the plan and proposed strategy has been positively prepared. We therefore consider the policy is not sound.

Evidence Paper considers housing and employment land separately. The paper states that the emphasis of the housing strategy is that need will be met in the most sustainable locations with more housing being allocated towards the main urban area and seven main towns as the most sustainable locations for growth employment sites, the paper states that the focus within the plan is on people being able to travel from home to workplaces and as such sites do not need to be found within specified settlements to meet a strategy (as per housing) and that employment land is based on factors including marketability and location (Para 2.1.11) Emphasised last line of paragraph 2 of Policy 2, which says 'existing infrastructure, enabling people to access jobs, services and facilities locally.' policy also says that new development will be focussed in and around existing urban areas, main town and service towns and villages, with focus on new major employment sites in accessible locations. The Green Belt Review fails to consider the exceptional circumstances associated with other parts of the plan strategy, namely, to protect existing established employment sites and enabling people access to jobs locally. Proposed changes to make the plan sound A review of the Green Belt and consider the potential for new and expanded employment sites in the west of the borough to reflect and support the housing strategy. We note that six potential employment sites were assessed to the south of Edlington at Stage 3 of the Green Belt review for completeness. the site to the east of Broomhouse Lane should be removed from the Green Belt. Proposed Employment Site site is open space and in the Green Belt removal of the site from the green belt would provide the potential for an extension to the existing Broomhouse Lane industrial estate removal of the site from the Green Belt would bring the settlement boundary in line with the southern extent of the boundary to the west Amendment to the Green Belt would enable a further employment allocation in the west of the borough to support and meet the needs of existing employers in this area

Response:

Noted. Support welcomed. A Settlement Background Paper was produced which supported the Publication Version of the Local Plan and was made available at the same time. It was also made available at the Informal Consultation stage. The Green Belt Topic Paper explains why there are no employment allocations within the Green Belt at this time i.e. it is considered that there are currently no exceptional circumstances. The explanatory text of Local Plan Policy 3 also explains that there is access to business parks across the border in Rotherham. These can be accessed using strong public transport links and road connectivity.
ID Planning

Chapter 4: Strategic Approach

Policy 2: Spatial Strategy & Settlement Hierarchy

Tests of Soundness:

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Comment:

2.1 This section of the representation statement provides comment on the Local Plan Publication Version Consultation Document. 2.8 The proposed changes to settlement hierarchy result in Clayton now being identified as a 'Defined Village' which has a limited number of services and houses commuters to elsewhere. In the previous consultation draft there were only 12 defined villages and the Publication Version now includes 40 defined villages. We support the identification of Clayton as a defined village in principle. 2.9 The policy states that within their defined Development Limits development proposals will be considered against other policies of the Plan. Non-residential development will be supported if justifiable to support a prosperous rural economy. Whilst the policy supports development within settlement limits in principle, the reality is that there are few if any development opportunities within defined villages as the boundaries are tightly drawn to existing buildings and as such development is restricted. 2.10 Policy 2 supports development in the Countryside if adjacent to a tier 1-3 settlement and if the proposal meets the 5 stated criteria, one of which is that the Council are unable to demonstrate a 5 year housing land supply. The defined villages lie within tier 4 of the settlement and therefore this part of the policy would not support development adjacent to defined villages. 2.11 The final part of the Policy states that in exceptional circumstances, and subject to the demonstration of clear community support, residential development in appropriate locations may also be supported in the Countryside on land adjacent to the development limit of a Defined Village. However, it will only be supported if it does not exceed (a) the development size limit permissible for an individual scheme or site (as defined in Policy 3) of the relevant Defined Village and (b) does not exceed the cumulative growth limit over the Plan Period (defined in Policy 3) of the relevant Defined Village. 2.12 An appropriate location is defined as: "a location which does not conflict, when taken as a whole, with national policy or policies in this Local Plan. In addition, to qualify as an appropriate location, the site, if developed, would:- - Retain the core shape and form of the settlement; - Not significantly harm the settlement’s character and appearance; and - Not significantly harm the character and appearance of the surrounding countryside or the rural setting of the settlement. 2.13 The policy states that an exceptional circumstance is: "a matter for the decision maker to determine, but could be, for example, where there is a clear demonstrable need for a development, not foreseen by the Plan, that brings significant sustainable development benefits and is consistent with national planning policy in the NPPF. The provision of affordable homes is an example of development likely to meet this definition. For clarity, areas at risk of flooding (flood zone 2 or 3) are not considered as appropriate locations for the purposes of this part of the policy" 2.14 The term ‘demonstration of clear local community support’ is stated to mean: "That at the point of submitting a planning application to the Council, there should be clear evidence of local community support for the scheme, including, where appropriate, that of the applicable Parish or Town Council generated via a thorough but proportionate pre-application consultation exercise.” 2.15 Whilst we welcome the change to Policy 2 which could allow an extension to a Defined Village in principle, it is maintained the changes do not go far enough to support rural communities and the settlements in which growth will be supported is more limited than this policy suggests. 2.16 This part of the policy refers to development size limits set out in Policy 3. A review of Policy 3 highlights that only 14 defined villages are listed with size limits of 5-20 dwellings. There is no reference to the other 26 defined villages, although the footnote to the policy that states the development may be permissible in the 14 listed defined villages. The supporting text at paragraph 4.46 states there will be limited development opportunities on a smaller scale in the 40 defined villages. The text in Policy 2 is therefore misleading, as it appears that Policy 3 only supports development in 14 of the 40 defined villages and Clayton is not one of the listed villages where development is supported, despite the settlement’s proximity to Thurnscoe, which has a range of services and a train station. 2.17 There is greater support for settlement extensions in the higher tiers (1-3) though only in the absence of a 5 year supply, yet given these settlements are larger there will naturally be more opportunities for infill and brownfield development within those settlement. In contrast, it is the defined villages where boundaries are tightly drawn where there are few if any opportunities for development within settlement limits and where there should be greater support for appropriate extensions to the settlement. 2.18 The policy should be amended to support the extension of all the Defined Villages where there are limited opportunities for infill development. At the very least, this could be identified as an example of an ‘exceptional circumstance’. 2.19 Without any amendment, the spatial strategy for the Defined Villages is not justified as Policy 2 principally supports infill development in the Villages yet there are very limited opportunities for such development given that settlement boundaries are tightly drawn. Whilst the policy supports the extension of some of the Defined Villages in exceptional circumstances, this is not an appropriate strategy given settlements such as Clayton are sustainably located and would not meet the requirements for extensions to the settlement as it is not listed in Policy 3. The proposed approach is not consistent with paragraph 78 of the NPPF which supports sustainable development in rural areas.
Support the identification of Clayton as a defined village in principle. Policy 2 allows an extension to a Defined Village but does not go far enough to support rural communities and the settlements in which growth will be supported is more limited than the policy suggests. Policy 3 highlights that only 14 defined villages are listed with size limits of 5-20 dwellings. There is no reference to the other 26 defined villages, although the footnote to the policy that states the development may be permissible in the 14 listed defined villages. The supporting text at paragraph 4.46 states there will be limited development opportunities on a smaller scale in the 40 defined villages. The text in Policy 2 is therefore misleading, as it appears that Policy 3 only supports development in 14 of the 40 defined villages and Clayton is not one of the listed villages where development is supported, despite the settlement's proximity to Thurnscoe, which has a range of services and a train station.

Policy 2 supports the extension of villages in the Countryside in certain circumstances. However for settlements in the Green Belt national policy will be applied and this is explained in the Policy and explanatory text.
We agree with the proposal to include Cadeby amongst the "Defined Villages" under the Settlement Hierarchy but note that the proposal for the Green Belt to 'wash over' Cadeby has been removed from the final draft. We would like this to be reconsidered.

Summary:
Support is given to the proposal to include Cadeby amongst the "Defined Villages" under the Settlement Hierarchy. However, it is noted that the proposal in the 2018 Consultation Version of the Local Plan for the Green Belt to ‘wash over’ Cadeby has been removed from the final draft. This should be reconsidered.

Response:
The Parish Council is right to note that it was proposed to include all Defined Villages in the Green Belt as "washed over" Green Belt settlements. However, as explained in the Green Belt and Housing topic papers, this is no longer proposed as it is considered that exceptional circumstances for this cannot be justified.
Harlington 66, these are modest in the Harlington have long
30/09/2019 Rhonda Job Attend Hearing
that development cannot be supported in villages which have no services whatsoever. We do not support an allocation
Policy 2: Spatial Strategy & Settlement Hierarchy
all of which will result in increased vehicle traffic on
Marr Parish Council
Chapter 4: Strategic Approach
Response:
with the proposed development sites and scale of development in these two villages. Marr Parish acknowledges that DMBC has undertaken a detailed review of all Settlements and an assessment of local Services in these locations — including those services currently in Sprotbrough Village and Barnburgh/Harlington. The Local Plan asserts that some services exist in these rural villages however, it neither considers nor assesses service availability. Services in both these villages are at capacity, with bus routes and local roads congested and oversubscribed schools. It is impossible to see how development here could be considered sustainable. As such, we do not agree with the proposed development sites and scale of development identified within the Proposed Local Plan for these two Defined Villages. Unacceptable levels of congestion continue to plague and impede vehicle movement on these and surrounding ‘B’ routes. This will be further compounded by the addition of a proposed 445 new houses in Mexborough, huge development plans along the Dearne Valley Parkway which Barnsley Council propose to deliver through their own Local Plan - all of which will result in increased vehicle traffic on routes through and around the villages. We strongly object to the inclusion of these new developments within the local plan, as they cannot be considered reasonable or sustainable.

Summary:
Marr should be identified as a "Smaller Green Belt Village" with no identified 'Development Limits" as was proposed in the 2018 Consultation. The previous identification of villages with 'washed over Green Belt' status should be reinstated provided only Infill development would be permitted in the small villages and hamlets in line with the stated policy and with the assurance that any application for such development which must be proportionate, sympathetic and in keeping with their character. DMBC have stated that: 5.2.3 It is acknowledged that some sites within the existing settlement limits (infilling) of the 'Defined Villages' could still come forward and would be compliant with the settlement hierarchy as set out, but these are not being relied upon for the purposes of the Local Plan. Any such sites will be an additional supply of housing (windfalls). Due to the Local Plan not being reliant on this source of supply for housing allocations to meet the plan period's housing target, they were not assessed any further. Since the 'Call for Sites' stage in autumn 2014, some of these sites could (and indeed have) come forward with a planning application in advance of the Local Plan e.g. existing UDP allocations, or land within designated Residential Policy Areas. We noted that the proposed settlement strategy did not direct housing to the smaller 'washed over Green Belt' villages (now Defined Villages) and DMBC have stated that they do not propose to allocate sites in these settlements within the proposed Local Plan, irrespective of the Green Belt status. We would therefore urge DMBC to remove any and all proposed development sites identified and included within the previous 'Call-for-sites' for our village as these should now be considered inappropriate and unsupported by both Marr Parish and DMBC. It is contrary to the settlement hierarchy, any development is 'not relied' upon to achieve DMBC’s housing target and development cannot be considered sustainable since it is well documented by DMBC - that development cannot be supported in villages which have no services whatsoever. We do not support an allocation of housing distribution for Barnburgh & Harlington and Sprotbrough Village which have been categorised as 'Defined Villages'. Sprotborugh Village has already identified its housing needs and has created a Neighbourhood Plan. The Local Plan development proposals now conflict with this. Particular consideration must also be given to the impact of new dwellings proposed on land that floods at Barnburgh/Harlington. Marr Parish acknowledges that DMBC has undertaken a detailed review of all Settlements and an assessment of local Services in these locations - including those services currently in Sprotbrough Village and Barnburgh/Harlington. The Local Plan asserts that some services exist in these rural villages however, it neither considers nor assesses service availability. Services in both these villages are at capacity, with bus routes and local roads congested and oversubscribed schools. It is impossible to see how development here could be considered sustainable. As such, we do not agree with the proposed development sites and scale of development identified within the Proposed Local Plan for these two Defined Villages. Unacceptable levels of congestion continue to plague and impede vehicle movement on these and surrounding ‘B’ routes. This will be further compounded by the addition of a proposed 445 - 1000 new houses in Mexborough, huge development plans along the Dearne Valley Parkway which Barnsley Council propose to deliver through their own Local Plan - all of which will result in increased vehicle traffic on routes through and around the villages. We strongly object to the inclusion of these new developments within the local plan, as they cannot be considered reasonable or sustainable.

Response:
The Green Belt Topic Paper sets out why the Council have reverted to defining Marr as a village inset within the Green Belt rather than covered by it. There is not considered to be sufficient justification to make this settlement Green Belt. Sprotbrough and Barnburgh - Harlington have long been earmarked as Service Towns and Villages with housing requirements in the Local Plan and through the Local Plan process. There is no conflict with Sprotbrough NP, which does not make allocations. Site 777 at Barnburgh is not within an area of high flood risk, although there is a functional flood plain to the south. Development in Sprotbrough will deliver 80 houses, and Barnburgh will deliver 80 houses, and Barnburgh - Harlington 66, these are modest in the scheme of things and not deemed to be overly intrusive on the landscape or of such a scale that services will be unduly impacted upon within the villages.

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Marr Parish notes from previous consultation feedback, the "Homes and Settlements" proposal, Doncaster’s current population = 300,000. If, as the Draft Proposal suggests, 13,800 new homes will be added over the next 15 years and assuming two residents per new home, this translates to an additional 27,600 potential new residents - equating to a +9% increase on the current population. We appreciate that a more detailed Settlement Review has been conducted along with services identified within each settlement area. We further note and agree with the decision that targeted development for new dwellings has been directed to areas where services are more prevalent and more readily available. However, even after consultation has been conducted with service providers, we remain unconvinced that the Local Plan has assessed or has made robust plans for, how it will adequately address the impact on such services. The Local Plan must ensure that the needs of the projected increase in population can be met by all current major providers and all other essential services e.g. schools, GP’s, Dentists, Public transport capacity and duration and Hospitals. It is our opinion that these services are critical to sustainability and should be further scrutinised. Without confidently outlining how this is to be delivered, any proposed Local Plan cannot be considered "sound, effective or robust" if we are unable to ensure that our services meet current and future needs. There are several recent examples e.g. where a large new housing development in Woodlands has led to issues where there are no available school places at the local schools. This has resulted in children and parents having to travel significant distances to remote schools at Hooton Pagnell etc where even at this school there is no classroom availability and makeshift classrooms have been created in the main school hall. This cannot continue and it is most certainly not 'effective or sound' practice for a new Local Plan which has targeted a significant growth in housing. This also encourages more travelling than should be necessary and subsequently, is contrary to and is not in keeping with DMBC’s reduction of carbon emission Local Plan Policies. We have further concerns regarding Doncaster Royal Infirmary, the main Hospital for the Borough and availability of service. Since it has been well publicised that the hospital has capacity issues and is struggling to maintain services for the current population, with suggestion that #millions of pounds of investment is required just to service the current volume of patients. Marr Parish maintain that additional investigation is needed to ensure provision of services can be provided for all existing as well as the projected new resident increase if the Local Plan is to be considered 'sound'.
Comment Ref: C/Policy 3/0077/6/002

Name: Campaign To Protect Rural England South Yorkshire
Organisation: Campaign to Protect Rural England South Yorkshire

Date: 30/09/2019
Representing:

Comment Ref: C/Policy 3/0077/6/002

Attend Examination: Attend Hearing

Reason: To assist the Inspector by using our submitted representations to answer his/her questions, particularly in light of the evidence submitted by other representors and any other matters the Inspector may raise.

Area: Chapter 4: Strategic Approach

Policy: Policy 3: Level & Distribution of Growth

Tests of Soundness: Positively prepared
Justified

Comment:

Not positively prepared to decouple employment opportunities from dependence on road traffic, will therefore fail to address UK carbon budgets. Not positively prepared because additional housing numbers above the Standard Methodology are not linked to sustainable development outcomes.

Summary:
The Plan is not positively prepared to separate employment opportunities from dependence on road traffic. It will fail to address UK carbon budgets. Not positively prepared because additional housing numbers above the Standard method are not linked to sustainable development outcomes.

Response:
The outcome of consultation on the preferred strategy was that jobs did not necessarily need to be located next to residential areas, and the focus is on providing employment in accessible locations that are accessible to workers. Additionally, Policy 13 deals with road network improvements that can help facilitate the strategy.
The basic principle of regarding the Standard Methodology figure as the lower end of a range for the housing requirement is broadly in line with our recommendations in response to the Homes & Settlements consultation last year. In that response, we took the position that any uplift above the standard figure should be associated with delivering specific outcomes, such as transforming affordable housing provision, delivering innovative zero carbon homes, self-build etc. This would also enable the market to be more segmented, recognising that volume housebuilders and other, more diverse providers have a complementary role in meeting housing need. This would mean, for example, that a scheme to remodel and densify an under-used site for co-working units would be considered to contribute to the uplift, but not to the baseline. Therefore our recommended approach is to regard the standard figure (unclear if this is 572 or 585) as the baseline target, and to use this as the basis for the 5-year land supply calculation. The Plan appears to have taken this approach, which we support. However, the Plan has not made any provision to secure additional outcomes from exceeding the baseline figure, in terms of the better affordable provision, zero-carbon homes or market diversification that we have proposed. Were our recommended approach to be taken, it would enable the Plan to treat around 36% of new housing as providing specific opportunities for enhancing places, and to be able to set very high standards for that housing accordingly.

Instead the range figure up to 920 is simply aimed towards supporting economic uplift, such that the generalised housing requirement is assumed to grow in proportion to any above-trend economic growth. This is a missed opportunity which will cause the Plan to fall short on delivering a range of planning outcomes beyond housing numbers, especially in design, housing mix and making efficient use of land. PROPOSED CHANGE: We recommend setting a policy framework for the specific policy outcomes that new housebuilding at any rate exceeding 585 would be expected to deliver, and make clear that release of land to enable higher build rates would be conditional on clear proposals to implement that.

Response:
The uplift is tied to delivering economic growth for the borough, however other policies in the plan will ensure that housing delivered in the borough can deliver affordable housing, good design outcomes, environmental enhancement and overall sustainable development.
Comment: 5.5 According to the 'Housing & Employment Site Selection Methodology & Results Report' (June 2019) the 481 hectares will comprise 318 hectares of land which already has the benefit of planning permission (as at 31 March 2018) and 164 hectares of land which the Council is allocating for employment use through its Local Plan allocations. 5.6 We comment specifically on the allocation of employment sites in the plan below. However, as a general point we consider that the allocations that have been made are not justified or effective because land is required in the south-west quadrant of the M18 and not in the north where sites already exist. This is because the Unity site (site reference 418) already provides significant land in this area to meet demand. The allocation of further land in the north is not effective because the market demand is looking for land in the south-west.

Summary:
The Housing and Employment Site Selection Methodology & Results report states that the 481 ha is made up of 318 ha which has planning permission and 164 ha of allocations. The allocations are not justified or effective as land is required in the south-west quadrant of the M18 and not in the north. The Unity site (ref 418) provides significant land in the north to meet demand. The allocation of further land in the north is not effective as there is no market demand.

Response:
Noted. No change needed as there is no evidence to suggest that land is required in the south west of the M18 rather than the north.
5.2 Policy 3 of the Publication Draft Local Plan states that the aim of the Local Plan is to facilitate delivery of, inter alia, at least 481 hectares of employment land over the plan period (2015-2035). 5.3 We consider that the plan is not positively prepared or effective because the need identified in the Employment Land Need Assessment (2019) is too low. The take up of employment sites in the last three years has been significant; 129 hectares of employment land has been built out of the 318 hectares identified in Table 9.25 of the 'Housing & Employment Site Selection Methodology & Results Report'. 5.4 Accordingly, the amount of employment land required in the plan under Policy 3 needs to be increased. The failure to allocate sufficient land for increased employment needs means that the plan has not been positively prepared. The current level of employment land in the plan is not justified or effective.

Summary:
The Plan is not positively prepared at the need identified in the Employment Land Need Assessment and then included in Policy 3 is too low. The employment land take up in the last three years has been significant - 129 ha has been built out of the 318 ha identified in Table 9.25 of the Site Selection report. The amount of land in Policy 3 needs to be increased. The current level of employment land is not justified or effective.

Response:
Noted. No change required. Section 6 of the ELNA explains how the employment land need figure has been calculated i.e. additional factors such as competition and choice have been taken into account in the final figure. There is also an Employment Land Supply Buffer Note which explains this in more detail. There is no need therefore for additional land to be provided.
Tests of Soundness:

Comment:
It is noted that the Plan period runs from 2015 until 2035. Paragraph 22 of the NPPF looks for Plans to have a 15-year period from adoption. As the consultation is only just being undertaken for the Regulation 19 stage, it is unlikely that the Plan will be adopted in 2020. Therefore, the HBF consider that it may be beneficial to take a cautious approach and to extend the Plan period. The HBF also note that the Plan period for land supply runs from 2018, and in the case of housing appears to run until 2033. This appears confused and an unnecessary complication.

Summary:
The Plan period should be extended to ensure that a 15-year plan period exists from adoption. It is also noted that the Plan period for land supply runs from 2018, and in the case of housing appears to run until 2033. This appears confused and an unnecessary complication.

Response:
The current Local Development Scheme identifies potential adoption of the Local Plan in 2020. All of the baseline information in terms of land supply commences at April 2018 as this was/is the latest monitoring and land supply identified for the whole plan period that meets the requirement.
Setting the baseline: 2014

Attend Hearing

Policy 3: Level & Distribution of Growth

The Home Builders Federation

unless exceptional circumstances justify an alternative

Consistent with national

Chapter 4: Strategic Approach

0129

Capping the level

To allow for greater discussion of the industry concerns and to address any points that arise during the examination.

Policy:

Policy 3: Level & Distribution of Growth

Tests of Soundness:

Positively prepared

Justified

Consistent with national

Comment:

Policy 3 is not considered to be sound as it is not positively prepared, justified or consistent with national policy for the following reasons: The Council has continued to identify a net housing requirement of 920 dwellings per annum (dpa) over the plan period 2015-2035. Paragraph 60 of the NPPF 2019 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”. The HBF have considered the local housing need (LHN) using the Standard Methodology set out in PPG, it can be calculated as follows: Step 1 - Setting the baseline: 2014-based household projections in England average annual household growth over a 10 year period, with the current year being used as the starting point. The household projection for 2019 is 131,355 and in 2029 is 136,591, therefore the growth equals 5,236, giving an average of 523.6 dwellings each year. Step 2 - An adjustment to take account of affordability: The most recent median workplace-based affordability ratio for Doncaster (2018) is 4.81. Where an adjustment is to be made, the formula is: Adjustment factor = ((Local affordability ratio - 4) / 4) x 0.25 + 1 For Doncaster this would be: Adjustment Factor = (((4.81 - 4) / 4) x 0.25) + 1 = 1.051 Minimum annual local housing need figure = (adjustment factor) x projected household growth. For Doncaster this would be: Minimum annual local housing need figure = 1.051 x 523.6 = 550 dpa. Step 3 - Capping the level of any increase: The Doncaster Core Strategy was adopted more than 5 years ago, therefore the local housing need figure is capped at 40% above whichever is the higher of: the projected household growth for the area over the 10 year period identified in step 1; or the average annual housing requirement figure set out in the most recently adopted strategic policies. The Doncaster Core Strategy has a housing requirement of 1,230 new homes each year 2011-2028, 40% above the 1920 dpa would be 1,727dpa. The capped figure is greater than the minimum annual local housing need figure and therefore does not limit the increase to the local authority’s minimum annual housing need figure. It should be noted that the Standard Method identifies a minimum annual housing need figure, it does not produce a housing requirement figure. It should also be noted that 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 states 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. The Peter Brett Economic Forecasts and Housing Needs Assessment 2018 identifies a demographic starting point from the 2014-based household projections of 562dpa, which 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 pf 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. The Council identify that the housing requirement will be expressed as a range with the bottom of the range being the LHN and the top of the range being the 920 dpa. As set out above the HBF do not consider that the LHN produced from the Standard Method would provide an appropriate housing requirement, it is evident that the actual housing requirement should be higher. The HBF do not consider that it would be appropriate to limit the housing requirement at the top end of the requirement either, and do not consider that this would be consistent with the NPPF requirement to support the Government’s objective to boost the supply of homes. The HBF do not wish to comment upon the exact distribution of development. The HBF is keen to ensure that the Council produces a plan which can deliver against its housing requirement. To do this 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. The HBF consider that 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. The HBF and our members can provide valuable advice on issues of housing delivery and would be keen to work proactively with the Council on this issue. It is no use continually promoting growth in locations if there is little or no prospect of them being brought forward. The HBF also consider that it would not be appropriate to utilise the settlement hierarchy to limit development in other suitable locations, and as such it is important that the housing figures are taken as a minimum not a limit.

Summary:

Policy 3 is not considered to be sound as it is not positively prepared, justified or consistent with national policy. The HBF do not consider that the Local Housing Need produced from the Standard Method would provide an appropriate housing requirement. Using the standard housing need methodology set out in PPG, and given the Core Strategy housing requirement, it is evident that the actual housing requirement should be higher. The HBF do not consider that it would be appropriate to limit the housing requirement at the top end of the requirement either, and do not consider that this would be consistent with the NPPF requirement to support the Government’s objective to boost the supply of homes. The HBF also consider that it would not be appropriate to utilise the settlement hierarchy to limit development in other suitable locations, and as such it is important that the housing figures are taken as a minimum not a limit.
Response:
As demonstrated in the Housing Topic Paper, the Local Plan is proposing an appropriate housing requirement that will meet the needs of Doncaster and its aspirations for growth.

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<td>Tests of Soundness: Positively prepared</td>
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**Comment:**

7. The Local Plan does not adequately provide positive growth allocation for Moorends. The absence of planned growth in Moorends may only serve to see this settlement become further isolated than it may already be considered by some to be, and excluded from future investment. To this end the Plan has not been positively prepared in so far as Moorends is concerned.

**Summary:**

Moorends. There is an inadequate 'positive growth' allocation for Moorends. The settlement will become more isolated and as a result and be excluded from future investment.

**Response:**
As demonstrated in the Housing Topic Paper, the Local Plan is proposing an appropriate housing target for Thorne Moorends.
Policy 3 (Level and Distribution of Growth)  Policy 3 identifies the need to deliver 18,400 new homes in the period 2015 to 2035 (920 per annum), with sufficient land allocated to deliver 15 years' supply of housing (13,230, or 882 dpa once supply in the years 2015 to 2018 is deducted from the overall requirement). However, 2019 to 2035 is 17 years, not 15 years and hence the Plan is 2 years short. Theakston Estates consider that this is a significant change since the Draft Plan for informal consultation. Policy 3 has shifted from stating that the 920 dpa is a minimum figure (‘at least’), to stating that the housing requirement is a range from the Local Housing Need (585 dpa) to 920 dpa. Theakston Estates does not feel that this policy is sound as it does not support a positively prepared plan which is supportive of boosting significantly the supply of housing. We consider it important that the wording in Policy 3 should state that the 920 dpa is a minimum and reflect the wording in the Draft Plan for informal consultation where the 920 dpa was stated as ‘at least 920 dpa’. Notwithstanding the above, the 920 dpa identified in Policy 3 is not evidenced within the ‘Economic Forecasts and Housing Needs Assessment’ (June 2018) (prepared by PBA) and it is unclear upon which evidence the 920 dpa figure is based. The PBA report states that in order to support the job-led scenario which supports the economic ambition of Doncaster and the Sheffield City Region over the plan period, 1,073 dpa would be required. This level of future housing is needed to support the jobs-led scenario over the plan period and to help drive forward economic growth across the Borough. Indeed, paragraph 2.9 of the draft Plan states that Doncaster is reasserting itself as a major economic centre within northern England, whilst the vision advises that by 2035 Doncaster will be a more important economic hub with a stronger, more balanced and productive economy. The draft Plan’s vision is informed by the ambitions of the City Region, its Strategic Economic Plan as well as the Northern Powerhouse ambitions. To enable the Plan’s vision to be achieved, it is most important that the Council’s Plan is positively prepared and that it’s housing requirement is aspirational but deliverable, in accordance with the National Planning Policy Framework (NPPF) (February 2019, but updated June 2019) (para. 16). Furthermore, an annual housing requirement of 1,073 dwellings is more aligned with housing delivery in recent years. The annual Doncaster Residential Land Availability Reports show average net completions over the last 3 years of 1,070. It is anticipated that this could rise when the net delivery figures for 2018/19 are published. Table 1 Doncaster Past Net Housing Delivery Year - 2015/16 Net no. of Homes - 1,025 Year - 2016/17 Net no. of Homes - 1,049 Year - 2017/18 Net no. of Homes - 1,137 Year - 2018/19 Net no. of Homes - 1,327* Source: Residential Land Availability Reports *number to be confirmed but current Council estimate based on methodology used in RLA The PPG at paragraph 1D.2a-010 is clear that the government remains committed to ensuring more homes are built and support authorities who want to plan for additional growth and as such the standard method is a minimum starting point in determining the number of homes needed in an area. The PPG goes on to identify the circumstances where it may be appropriate to consider whether actual housing need is higher than the standard method. These include where: - Growth strategies are in place such as Housing Deals; - Strategic infrastructure improvements are identified; and - Previous levels of housing delivery are significantly greater than the standard method. The PPG is clear that in these situations authorities will need to take this into account when identifying future needs. Doncaster’s Publication Local Plan does identify a housing requirement as a range, of which the upper end is above the standard method, trends in past delivery and the aspiration to support an economic led future for Doncaster suggest that in order to plan positively for the future it would be more appropriate for the housing requirement in Doncaster to be set at the 1,073 dpa to ensure that the vision can be achieved. Accordingly, Theakston Estates considers that there is a need to increase the housing requirement identified in Policy 3 to state at least 1,073 dpa, in line with the Council’s own evidence, if the vision for the plan is to be achieved. The minimum housing requirement for the MUA should also be increased to reflect this update. Finally, Policy 3 should make it clear that the number of homes per annum is a net figure. The Draft Plan which was issued for informal consultation in October 2018 explicitly stated that the annual requirement was a net figure; however, it is not clear whether the annual requirement in the Publication Plan is a ‘net’ or ‘gross’ figure. Delivery in the Doncaster Main Urban Area. As discussed in response to draft Policy 2, Theakston Estates considers that the delivery of ‘at least 50% of the Borough’s Total Housing’ in the MUA is a significant dilution to the 64% of housing which was previously directed to the MUA, and endorsed by the Inspector, in the adopted Core Strategy. To ensure a sound Local Plan, Theakston Estates contends that the proportion of development in the MUA must accord with the Core Strategy which would allocate pressure on less sustainable settlements and would drive forward economic growth in the Doncaster, an important sub-regional centre. Reserve Development Sites Paragraph 4.43 discusses the approach to the “Reserve Development Sites”. The Council considers that these are potentially suitable urban sites (mainly in the Doncaster MUA and Mexborough) but where deliverability issues (mainly associated with flood risk mitigation and / or directly impact by the safeguarding route of HS2) have prevented them coming forward and where their development in the plan period cannot at this time be demonstrated. This paragraph continues by stating that if they came forward within the plan period they would be additional to the allocations. Theakston Estates has fundamental concerns regarding the approach to the “Reserve Development Sites” given their constraints, especially given that some of these sites are subject to flood risk and that alternative sites are available, such as land at Scawby Lane (ref 436), that are not at risk of flooding. As these sites are not deliverable / developable they should have no status in the Plan. Please see the response to draft Policy 6 for details of the concerns and how the approach conflicts with the NPPF. PROPOSED CHANGE To ensure a sound Plan, Theakston Estates contends that the housing requirement identified in Policy 3 must be increased to state at least 1,073 dpa, in line with the Council’s own evidence provided in the ‘Economic Forecasts and Housing Needs Assessment’ (June 2018) (prepared by PBA). Otherwise, the housing requirement would not have been underpinned by a relevant and up-to-date evidence and hence the Plan would not sound, contrary to the NPPF (February, 2019) (paragraphs 31 and 35).
Summary:
2019 - 2035 is 17 years, not 15, and therefore the plan is 2 years short. Theakston Estates consider there has been a significant change since the informal consultation. Policy 3 has gone from 920dpa minimum to stating the requirement as a range from 585 - 920. This is not considered sound or positively worded. Policy 3 should state 920 dpa is a minimum and reflect the wording of the informal consultation. It is unclear from the Economic Forecasts and Hosing Needs Assessment what evidence the 920 dpa is based on. This report states 1,073 dpa is required to support the economic ambition of Doncaster and the City Region and the jobs led scenario over the plan period, as well as driving economic growth as set out in para. 2.9 and the Vision. 1,073 is more aligned to housing delivery in recent years. The annual RLA average net completions over the last 3 years is 1,070, and is anticipated to rise when 2018/19 figures are released. PPG (paragraph ID :2a-010) is clear that the government remains committed to ensuring more homes are built and supports authorities who want to plan for additional growth, and as such the standard method is a minimum starting point. for determining housing need. It also identifies circumstances where it may be appropriate to plan for higher levels of housing. Trends in past deliver show that it would be more appropriate to plan for 1,073 dpa to ensure the vision is achieved, in line with the Council’s own evidence, and the housing requirement for the MUA should be updated to reflect this. Policy 3 should also make it clear that this is a net figure - the draft plan did but the publication plan does not. The requirement for the urban area should be 64% in line with the Core Strategy. Fundamental concerns about the Reserve Development Sites given their constraints - especially flood risk. There are alternative non-flood risk sites such as site 436 available. As the Reserve Development Sites are not deliverable / developable, they should have no status in the plan. Proposed change: the housing requirement should be a minimum of 1,073 in line with the Council’s own evidence base (PBA report). Otherwise the housing requirement would not be underpinned by relevant up to date evidence and the plan would be unsound - contrary to NPPF para. 31 & 35.

Response:
The Core Strategy is being replaced by the new Local Plan and as such the spatial strategy is changing. The Local Plan publication version covered the 20 year period 2015 - 35, with 15 years’ worth of allocations 2018 - 33 and enough supply to cover the years 2033 - 35. The submission Local Plan included a range, but still plans for enough housing to meet the requirement of 920dpa over the plan period - the use of a range does not prejudice this. 920dpa is the assessed level of housing required under the revised NPPF, 1,073 refers to the figure using the previous NPPF, which is now redundant. It should also be noted the PBA report states a mid way point between 585 and 920 could be used, which the Council elected not to do. The Local Plan is planning for 57% more housing than the Standard Methodology proposed, and in doing so the Council have taken on board national policy and guidance. This is further explained in the Housing Topic Paper, as is the approach to Reserve Development Sites.
5.1. Strata Homes is concerned that the Doncaster Local Plan Draft Policies and Proposed Sites is deficient in its content and evidence base and does not reflect national guidance. Test of Soundness 5.2. Strata Homes considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 5.3. Strata Homes have a number of concerns in relation to the Level and Distribution of Growth. The concerns relate to the following: - The Local Plan housing requirement is not sufficient and is not fully aligned with forecast economic growth. - The Local Plan identifies significantly more employment land than the target for provision established in Policy 3. - There is a significant mismatch between the level of employment land allocated and the level of housing land allocated in the Plan period; and - The identified supply is not sufficient to meet the Councils identified requirement. Need 5.4. Strata Homes is concerned with the proposed level of new housing being planned for in the Local Plan. Policy 3 makes provision for 18,400 dwellings to be delivered between 2015 and 2035, equivalent to 920 net new homes each year. Policy 3 states that there should be sufficient allocations for 15 years supply, which is 13,230 new homes. 5.5. Strata Homes has commissioned Regeneris Consulting to review the OAN and the Economic Forecasts and Housing Needs Assessment (2018). The Regeneris report is attached to these representations. Regeneris conclude that: - The target delivers the minimum level of housing need for Doncaster based on the standard method (585 dpa) and makes an upward adjustment to support economic growth. - The upward adjustment was based on evidence produced by PBA which recommended housing need is presented as a range between 585 dpa (the minimum) and 912 dpa. The upper limit was based on matching Jobs growth aspirations of the Sheffield City Region LEP (1,420) over the period 2016 to 2026. - However, PBA have made unjustified and unrealistic assumptions for a number of factors which all suppress the level of housing required to support future employment growth. In particular, we disagree with their assumptions about commuting, double jobbing and household formation rates. 5.6. Regeneris consider that: - Doncaster has been one of the fastest growing economies in Yorkshire and Humber. The district has created around 24,000 jobs between 2000 and 2017, representing a growth rate of 1.1% p.a. - Doncaster’s key asset is its connectivity by road, rail and air which has made it a highly attractive location for inward investment, particularly for industrial and logistics occupiers, with over 1.1m sq m of industrial/warehouse space taken up since 2010. - The strong performance is also due to a significant improvement in key economic indicators, including skills and levels of enterprise. The business start-up rate has more than doubled since 2010 and is now in line with the national average. These improvements have removed a key barrier to growth and mean that Doncaster is well placed to continue its high rate of growth. - The Local Plan has set a target of delivering 481 hectares of employment land between 2015 and 2035 and a number of ELR’s shows there continues to be very strong market demand for industrial space in Doncaster. There is therefore strong potential for Doncaster to accommodate high levels of inward investment in future which would also drive jobs growth. 5.7. Strata Homes have concerns that the proposed housing requirement does not represent an appropriate figure once consideration is given to the potential for economic growth and job formation. Strata Homes continue to consider that an appropriate balance should be sought between employment growth aspirations and the provision of homes. 5.8. The Framework (2019) reaffirms the Governments’ commitment to ‘significantly boosting the supply of homes’ and states that ‘it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed’. It goes on to state ‘to determine the minimum number of homes need, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify and alternative approach which also reflects current and future demographic trends and market signals’. 5.9. NPPG is clear that the standard method identifies a minimum annual housing need figure and that it does not produce a housing requirement figure Paragraph 002 Reference ID: 2a-002-20190220. It is also clear that the affordability adjustment within the standard methodology is just to ensure that the minimum housing needs starts to address affordability of homes. It therefore does not fully address affordability issues. Paragraph 006 Reference ID: 2a-006-20190220 5.10. NPPG goes on to identify the circumstances when it is appropriate to plan for a higher housing need figure than the standard methodology identifies. The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides the minimum starting point in determining the number of homes needed in an area it does not predict the impact of future government policies, behaviour. Therefore there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicate. 5.11. This will need to be assessed prior to and separate from, considering how much of the overall need can be accommodated. Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: 5.12. Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth 5.13. Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; 5.14. An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground. 5.15. There may, occasionally be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced SHMA) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need that the standard model suggests’. Paragraph 010 Reference ID: 2a-010-20190220. 5.16. The Council need to recognise that the development of new housing will bring forward additional economic benefits to the area. The relationship between economic performance in an area and housing is complex, but having the right quantity, quality and balance of housing in an area is necessary for economic growth. The development of new housing can therefore
support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population which will create sustainable local jobs from the increased demand for goods and services. This provides an important sustainable development opportunity for Doncaster. 5.17. Importantly the HBF released in July 2018 its report on "the economic footprint of house building in England and Wales", which shows that house building in England and Wales is now worth £38bn a year and supports nearly 700,000 jobs. House building activity contributes in different ways including providing jobs, taxes and contributing funding for local infrastructure and communities. House building supports the economy, in a wide sense through being drive for economic growth; delivering jobs and economic value; supporting labour market mobility; creating skills and employability; enhancing place competitiveness; creating quality of place and reusing brownfield land. 5.18. An important conclusion of the report and the wider economic benefits is that a healthy, well-functioning labour market requires a sufficient supply of housing that is affordable for local people to enable them to move jobs freely and match up skills with employer demand. A dysfunctional housing market can inhibit labour market mobility, in turn stifling economic growth. 5.19. Regeneris consider that Doncaster’s housing need over the plan period should be 1,100 dpa to support future economic growth. Regeneris consider that the target of 920 dpa would risk constraining the future economic growth of Doncaster. 5.20. Furthermore, it is evident that the council are seeking to align economic growth with housing growth and have identified provision above the local housing need figure to which the council considers accounts for Job Led growth. However, the jobs led growth figure is based on jobs growth forecast between 2015-2032. It is not clear whether consideration has been given to the additional job growth expected to the end of the plan period. Therefore Strata consider there is potential for the jobs led scenario to underestimate the jobs growth over the full plan period. The associated uplist to the housing requirement will therefore not be sufficient to meet the full needs over the plan period. 5.21. Additionally, the Council have identified a requirement for 481 hectares of employment land based on the Job Led scenario, and accounting for the extended plan period between 2032 and 2035. The explanatory text considers that this requirement is met through 117 hectares of land developed between 2015-2018, 201 hectares of land benefiting from planning permission, and 164 hectares of allocated sites. However, there is a discrepancy between the totals in paragraph 4.61 of the Plan and the figures arising from Tables E1 to E8. The sites that benefit from planning permission in tables E1 to E8 equate to 284.09 ha of employment land available within the Plan period. This leads to a total provision of 565.77 hectares of employment land against a requirement of 481 hectares. It should be noted that within the permissions identified in tables E1 to E8 that additional employment land is available, adding to the potential supply. There is therefore a significant mismatch between the level of planned employment provision in Policy 4 and the planned housing provision. Therefore, the housing requirement needs to be uplifted to reflect the identified level of employment land provision. 5.22. As stated above NPPG indicates that consideration can be given to delivery rates, for the last three years completions have been consistently higher than the proposed local plan target. Net completions amount to 3211 dwellings, with annual completions as follows: Year: 2015-16 Net Completions: 1,025 Year: 2016/17 Net Completions: 1,049 Year: 2017/18 Net Completions: 1,137 Year: Total Net Completions: 3,211 5.23. This demonstrates that there is sufficient demand to support a requirement above 920 dwellings per annum. 5.24. The Councils Economic Forecasts and Housing Needs Assessment (PBA, 2018) considers the housing requirement prior against both the standard methodology, standard methodology with an uplift for economic growth and previous approach for identifying housing need. Following the earlier approach, PBA consider that an aspirational job led figure, based on the SEP ambitions, would equate to a requirement of 1,073. PBA considered that it would be prudent to plan for between 562 and 1073. To ensure that the requirement was realistic. It is worthy of note that the Employment Land Needs Assessment (2019). Considers that the Job led scenario was ambitious but realistic and note the significant growth in Doncaster within the previous 15 years in line with SCR growth aspirations. And further the evidence of land take up and jobs growth for the period 2015-2018 was on target to meet 1% jobs growth per annum. This would support a target at the higher end of the range. 5.25. There is therefore evidence of both delivery at a higher rate and recently published evidence in evidence that indicates a higher need for housing. As stated above NPPG is clear that this evidence should be taken into account when determining the housing requirement. 5.26. When using the standard method the housing need figure was 585, applying a job led figure to match the SEP led to a requirement of 912 (PBA, 2018). However this is not based on the Jobs growth over the full plan period. 5.27. Strata Homes consider further evidence is required to demonstrate whether the affordable housing needs of Doncaster can be met based on a target of 920. The explanatory text states that the current need for affordable housing, 209 affordable units, represents 23% of the Local Plan requirement for housing. Paragraph 6.9 states that this does not take into account current completions or viability. The completions affordable completions for the last three years (first three years of the Local Plan) are as follows: Year: 15/16 Affordable Completions: 151 Total Completions: 1,088 Affordable completions (%): 13.88 Year: 16/17 Affordable Completions: 161 Total Completions: 1,067 Affordable completions (%): 15.09 Year: 17/18 Affordable Completions: 166 Total Completions: 1,208 Affordable completions (%): 13.74 5.28. The total affordable completions falling below the identified affordable need, even when total completions are higher than the proposed Local Plan requirement of 920. Further, Policy 8 identifies a requirement for 23% affordable housing in high/medium value areas and 15% in low value areas. An as indicated in response to Policy 8 and Policy 67, this is demonstrated to be unviable for a number of sites, including all types of sites in low value areas. Strata Homes are therefore concerned that a target of 920 dwellings will not deliver sufficient number and range of affordable homes to meet the identified need for affordable homes in the Borough. In order to deliver 209 affordable dwellings per year, a requirement of at least 1,393 would be required. This assuming the achievement of an average of 15% affordable housing, which represents the highest achieved over the last three years of monitoring. Paragraph 6.9 states that this does not take into account current needs of site completions or viability. The completions affordable completions for the last three years (first three years of the Local Plan) are as follows: Year: 15/16 Affordable Completions: 151 Total Completions: 1,088 Affordable completions (%): 13.88 Year: 16/17 Affordable Completions: 161 Total Completions: 1,067 Affordable completions (%): 15.09 Year: 17/18 Affordable Completions: 166 Total Completions: 1,208 Affordable completions (%): 13.74 5.29. Strata Homes consider that the target of 920 dpa would risk constraining the future economic growth of Doncaster. 5.30. Strata homes consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances Strata Homes consider the Doncaster Sustainable and Vibrant Economy (SIVE) does not consider the Doncaster in its current form to be sound. 5.31. However, Strata Homes consider that with a higher requirement, of at least 1100 to meet the economic growth aspirations, and further uplifts to balance housing allocations with the employment land allocations, and to ensure that the needs for affordable homes can be met (up to 1393) that the Local Plan can be found sound. Strata Homes will continue to work with the Council to develop appropriate modifications to the Local Plan Housing Supply and Delivery 5.32. Strata Homes is concerned that the Council’s approach to delivering the housing requirement does not appear to reflect national guidance. 5.33. The Council is not demonstrating sufficient flexibility in the supply of housing land to ensure that the Plan can meet identified needs in full. The Framework is clear that plans should be sufficiently flexible to adapt to rapid change, and emphasises the importance of ensuring that a sufficient amount and variety of land can come forward where it is needed. 5.34. PPG is clear that careful attention should be given to providing an adequate supply of land, and the Plan needs to be realistic about what can be achieved and when. Authorities need to ensure that policies setting out contributions expected from development do not undermine the deliverability of the Plan. (Paragraph 59 Reference ID: 61-059-20190315. 5.35. At present based on the Councils figures presented in the Local Plan, a Plan requirement of 18400, completions equating to 3400 and allocations equaling to 16,055, there is a flexibility of around 1055 dwellings which equates to 5% of the Local Plan Requirement. Strata Homes consider that this is insufficient given the potential for non-delivery and under delivery of sites, particularly from the dependency on a number of large sites. As set out in our response to a number of policies within the plan and specifically Policies 8, 46, 66 and 67, Strata Homes are concerned that some of the policies may undermine the deliverability of sites, or lead to the need for further site specific viability testing
impacting on the timing of delivery and therefore there is a need for greater flexibility in the housing supply. Specific sites are identified later in this section. 5.36. Strata Homes have a number of concerns relating to the supply in the Plan in terms of completions, the allocations from permissions and the new allocations. 5.37. It is noted that the supply attributed to completions appears to be resultant from gross completions rather than net completions. The Plan indicates that completions between 2015 and 2018 equate to 3400, however data in the Residential Land Availability Report indicates that net completions amount to 3211. Which would serve to increase the residual requirement based on an OAN of 920 to at least 15,189, and reduce the flexibility in the Plan to 866 dwellings (4.7%). With regards to this and the permitted supply from permissions and allocations, a housing trajectory has been provided. Strata Homes are concerned that this demonstrates that the Council will struggle to maintain a continuous supply of housing particularly in the later phases of the Plan period. Only four sites are identified as being capable of delivery in the final years of the plan period and two sites delivering beyond the plan period. 5.39. Furthermore, the Council’s HELAA and Residential Land Availability Report have a base date of March 2018, thus a whole monitoring year is presently absent. This evidence base should therefore be updated. 5.40. In terms of existing commitments it appears that the Council assumes 100% delivery and no discount has been applied. Best Practice and Guidance suggests that at least a 10% discount should be applied on sites with extant planning permission but this could vary depending on site specific constraints and complexity. Strata Homes supports the discounting of sites with planning permission but consider it may be beneficial to include a higher level of discount for large sites to take into account unforeseen circumstances and delivery delays. Strata Homes consider therefore that from a commitments pot of 9,488 dwellings a discount of at least circa 948 should be applied, however this could feasibly be higher given the history and constraints of a number of sites. 5.41. Strata Homes is concerned with the reliance on some existing housing sites with planning permission and their potential delivery, particularly as some are fairly historic brownfield sites with viability concerns in market challenging areas. There are a considerable number of outstanding planning permissions in poor market areas, some of which are also constrained by flood risk. Evidence of developer interest in such sites should be a fundamental requirement to provide confidence on delivery. For example, a brief review of some sites being shown as commitments shows considerable concern: Site Ref: 838 Site Name: Hexthorpe No. of Dwellings: 930 Strata Homes Comment: There have been a number of planning applications and proposed schemes over the years, but there has been no delivery on site. Countryside PLC has submitted a planning application which the Environment Agency has objected to and recommended refusal. There is conflicting evidence in terms of delivery rates, with the Local Plan and the HELAA. There are significant flooding constraints affecting the site. No further deliverability evidence has been produced in the Doncaster 5 Year Deliverable Housing Land Supply Statement. The Residential Land Availability Study notes that at 31/03/2018 there were no completions and the site is not currently being developed. Site Ref: 843 Site Name: Manor Farm, Bessacarr No. of Dwellings: 1,009 Strata Homes Comment: This is a Persimmon / Charles Church scheme. However, delivery has become frustrated by the need to deliver infrastructure to complete development. Since there is only one developer on the site the development trajectory is likely to be modest and development of the site is unlikely to be achieved during the plan period. The Residential Land Availability Report indicates 39 completed in 17/18 which is below the rates expected in the Local Plan and HELAA. Which assumes delivery rates of around 70 dwellings a year. This is not realistic based on current delivery. Site Ref: 418 Site Name: Unity/DN7 Initiative No. of Dwellings: 905 Strata Homes Comment: The site has outline planning permission for 3,100 homes. No reserved matters have been submitted. The site is in significant multiple ownership and understand that CPO procedures will be employed to facilitate the delivery of requisite infrastructure. Homes England is also assigning public funding to support the development. Given the presence of multiple landowners, the need for considerable public funding, the likelihood of a protracted timeframe to open up the site for development and the absence of confirmed market interest, the site is unlikely to deliver the Council’s prediction of 1015 homes in the plan period. The HELAA does not anticipate a start on site until years 6 to 10. However the local plan indicates 175 completions in the first five years. Higher rates of delivery are expected in the following years (70 dwellings per annum). These rates are overly optimistic especially when compared to annual completions for individual sites recorded in the residential land availability report. Site Ref: 569 Site Name: Askern Saw Mills No. of Dwellings: 220 Strata Homes Comment: This is a long standing, unimplemented planning permission that has been available but has remained undeveloped. There is no developer interest and consequently the assumed delivery of 220 new homes is optimistic. Indicated in the Residential Land Availability Report that the outline permission has lapsed. Site Ref: 984 Site Name: Former McCormick Tractors No. of Dwellings: 600 Strata Homes Comment: This site has significant constraints. There is an outline permission relating to the development of the site. The Local Plan assumes a delivery rate of 56 dwellings per in the first five years and 64 dwellings per annum in the following years. This is overly optimistic and not consistent with the planning status and constraints on site. Site Ref: 940 E1 and E2 Site Name: Land east of Poplars Farm No. of Dwellings: 280/920 Strata Homes Comment: Site 940 is allocated in the plan for development of up to 280 dwellings (Part E1), Part E2 is identified as a reserved housing site for up to 920 dwellings. This site does not form a true reserve site. The council have identified a release mechanism which restricts the release of housing to net additional jobs delivered at the airport. 5.42. Strata Homes understands that no allowance has been made for demolitions. No evidence is apparent and Strata Homes consider it would be appropriate for this evidence to be forthcoming. 5.43. The availability of land is crucial. To be considered deliverable the land needs to be available now and in terms of developable there needs to be a reasonable prospect that land will be available at the point envisaged. Strata Homes consider that sites which are not available or are unknown should not be included in the Plan or a buffer should be provided due to the uncertainty on delivery. Site Ref: 1028 Site Name: Tickhill No. of Dwellings: 74 Strata Homes Comment: This site does not have access, therefore cannot be considered to be deliverable. Further, the capacity of the site is unrealistic. This is a 1.5 hectare site, a capacity of 44 dwellings would reflect the assumptions on net to gross developable area and density set out in the Viability Study. Site Ref: 662/247 Site Name: Colliery Site, Rossington No. of Dwellings: 897/237 Strata Homes Comment: The delivery rate on the site are overly optimistic. In 2017/18 there were only 49 completions on site 662. Assuming delivery rates based on past performance at this site then it is considered that only 600 dwellings will be capable of coming forward within the Plan period. This is significantly less than the 1127 homes forecast within the Plan. Site Ref: 207 Site Name: Thorne No. of Dwellings: 207 Strata Homes Comment: This is a long standing allocation and there is little evidence available through the councils evidence base to demonstrate that there is developer interest or that the site will come forward in the short term. Site Ref: 795 Site Name: Thorne No. of Dwellings: 13 Strata Homes Comment: This site has permission which has since lapsed. There appears to be little developer interest in this site. The site is not considered to be deliverable. Site Ref: 510 Site Name: Thorne No. of Dwellings: 25 Strata Homes Comment: This site is a narrow and constrained infill site, with railway forming the southern boundary of the site. There is little evidence available through the Councils evidence base to indicate any developer interest in the site. Site Ref: 165/186 Site Name: Carcroft No. of Dwellings: 300 Strata Homes Comment: This site is located to the western edge of the settlement and is relatively distant from the key services and facilities such as the train station, and employment opportunities. Other sites are located nearer to key services. 5.44. A high level assessment of some of the proposed allocations shows that some proposals are at risk and hence one of the reasons why Best Practice suggests a buffer to the housing requirement should be included in the Plan. Furthermore, would appear to have leant heavily on allocating sites that already have planning permission as an alternative to identifying a sufficient supply of new allocation sites to meet its requirement for the plan period. Consequently, a number of settlements with strong sustainability credentials would appear to have insufficient allocations to meet their needs through the life of the plan. 5.45. It would appear in some instances that there are unrealistic assumptions on gross to net developable site areas and on the resultant yields from proposed allocations, especially when considering some of the development requirements. Strata Homes therefore suggest that further sites should be identified. 5.46. The Council therefore need a wider choice of sites.
across a number of different areas and market areas to gain traction and increase build rates. To achieve the housing requirement the Council need at least 30-35 housing outlets operating across the Borough for every year of the Plan and Strata Homes do not believe the Plan can deliver this, particularly in the middle to later years. 5.47. Strata Homes considers the Council should be more realistic on the potential delivery on sites, particularly on sites which have not commenced preparations of securing the relevant planning permission and developer interest and on build rates. Strata Homes consider that the sites with no planning permission should not be providing completions until 2023/24 (which is two years post adoption) as there is significant work and preparations to commence on site, including time to prepare and submit the planning application, gain planning permission, discharge conditions, legal agreements, site preparations, and commence house building. This process can take around 2 years. 5.48. Strata Homes would be happy to work through the specific sites in detail with the Council to seek to reach agreement on the HELAA and current housing commitments. Interestingly, in line with the general direction of travel for this Local Plan the new Framework (2019) defines the term Deliverable in the glossary stating that sites can only be considered deliverable where they have detailed planning permission. If they have outline planning permission or are allocated in a plan a site can only be considered if there is clear evidence that housing completions will begin on site within five years. The level of evidence that must be provided to demonstrate that sites are deliverable has therefore been tightened. 5.49. Strata Homes considers that the main risks to the delivery of the housing requirement are slippages in the delivery of allocations, longer lead-in times, reduced housing capacity on sites, sites no longer coming forward as result of viability from policy obligations set out in the Local Plan. Given these risks Strata Homes would suggest a greater flexibility is incorporated into the Local Plan especially in light of Strata Homes’ conclusions on the actual housing requirement. 5.50. Strata Homes would encourage the Council to review the existing commitments to ensure this is still deliverable, whether there is a housebuilder on board and whether there are any constraints preventing development from coming forward. Strata Homes would also ask the Council to look at the proposed delivery of site allocations to determine whether the delivery rates are appropriate and the sites are deliverable in light of the policy obligations proposed in the Local Plan. 5.51. Taking into account the above, the Council should be making provision for: Annual Housing Requirement Council Figures: 920 Strata Homes’s View: 910.5 Total Requirement (2015-2035) - which is 15 years post adoption Council Figures: 18,400 Strata Homes’s View: 22,000 Completions Council Figures: 3,400 Strata Homes’s View: 3,211 Total Commitments Council Figures: 9,488 Strata Homes’s View: 9,488 Non-Delivery Allowance (at least 10%) Council Figures: 948.8 Strata Homes’s View: 948.8 Total Allocations Council Figures: 6,567 Strata Homes’s View: 6567 Total Supply Council Figures: 18,506 Strata Homes’s View: 18,317.2 Residual homes to be identified Council Figures: -106.2 Strata Homes’s View: 3,682.2 5.52. Therefore, on a best case scenario Strata Homes consider as a minimum there needs to be circa 3,682 new homes to be identified in the Plan to account for net completions, and economic growth. 5.53. This does not account for the uplift required to ensure affordable housing need is met in full, which as indicated in paragraph 5.28, would lead to a requirement of 1,393 dpa and a plan requirement of 27,860. Based on the current supply of 3,211 completions, 9,488 commitments, an allowance for 10% non-implementation, and the currently proposed allocations of 6,567 homes, this would lead to need for a further 9,542 additional homes. 5.54. Significantly, the scenarios above do not balance housing provision with the additional employment allocations. The additional employment allocations amount to 83.77 hectares above the requirement, this is the equivalent of an additional 3.5 years supply of land. As a result in order to balance the housing provision with the additional employment supply circa 3,850 additional homes would be required, this amounts to an annual requirement of 1292.5 dpa. Strata Homes consider circa 7,532 additional homes are required in order to balance the Housing with Employment supply, account for net completions and appropriate non-implementation rates. Employment requirement 2015-2035 Strata Homes’s View: 481 hectares. Annual employment requirement Strata Homes’s View: 24 hectares. Employment land developed 2015-2018 Strata Homes’s View: 117 Sites with planning permission Tables E1 to E8 Strata Homes’s View: 284.09 New employment allocations Policy 4 Strata Homes’s View: 164.68 Total Allocations Strata Homes’s View: 565.77 Amount of land allocated over the requirement Strata Homes’s View: 83.77 Additional homes required to balance with employment land supply Strata Homes’s View: 3,850 Residual homes to be identified Strata Homes’s View: 7532.2 5.55. These figures assume no changes to the currently identified housing sites, which, in response to policy 3 and policy 6, Strata Homes have raised significant concerns, particularly with regards the deliverability, capacity, and delivery rates of some sites and the overreliance on existing permissions or longstanding allocations. This does not account for additional economic growth associated with the airport. 5.56. Furthermore, there does not appear to be any safeguarded sites or genuinely deliverable reserve sites identified within the Draft Plan. This is concerning given Policy 6 states that the Plan will designated Reserve Development Sites. However, it states that the reserves sites identified are not considered developable in the plan period. Paragraph 4.43 of the Plan indicates that the reserve sites have flood risk mitigation issues or safeguarding issues associated with HS2 preventing them from coming forward. Strata Homes would suggest, in order to assist with flexibility, that safeguarded sites be proposed in accordance with national guidance. The only other reserve site is related to direct job growth at the Airport and is strictly controlled, thus does not provide flexibility for the Plan as a whole. 5.57. The above scenarios do not include a detailed analysis of existing commitments and proposed allocations, however from a high level analysis is evident that the Council’s trajectory and analysis of sites is optimistic. 5.58. Therefore, with an increased housing requirement, reduced potential from existing planning permissions sites and incorporation of a flexibility allowance, further land will need to be identified. 5.59. Strata Homes consider that the appropriate areas and sites to accommodate growth would be: - Site 234 Broad Axe, Scawthorpe, MUA. 5.60. A brief summary is provided for this site in response to Policy 6. A delivery statement will submitted shortly. The will show a masterplan and vision for the proposed scheme and illustrates the potential of the scheme. This report will be supported by significant technical information and the report will demonstrate that the sites are available, suitable and achievable and therefore deliverable in accordance with the Framework and PPG. 5.61. Strata Homes consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 5.62. However, Strata Homes consider that with an appropriate uplift to the housing requirement, consideration of net completions, non-implementation rates and the allocation of additional land and safeguarded sites that the Local Plan can be found sound. Strata Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change To overcome the objection and address soundness matters, the Council should: - Increase housing requirements to 1,100 to 1,300 dwellings over the plan period. - Reduce the potential from current commitments and include a non-delivery allowance. - Identify safeguarded land, and - Allocate site at Broad Axe, Scawthorpe, Doncaster site (Site 234)
Strata Homes have a number of concerns relating to the Level and Distribution of Growth: - The Local Plan housing requirement is not sufficient and is not fully aligned with forecast economic growth. - The Local Plan identifies significantly more employment land than the target for provision established in Policy 3. - There is a significant mismatch between the level of employment land allocated and the level of housing land allocated in the Plan period; and - The identified supply is not sufficient to meet the Councils identified requirement. Need: Strata Homes commissioned Regeneris Consulting to review the OAN and the Economic Forecasts and Housing Needs Assessment (2018) who conclude that: - The target delivers the minimum level of housing need for Doncaster based on the standard method (585 dpa) and makes an upward adjustment to support economic growth. - The upward adjustment was based on evidence produced by PBA which recommended housing need is presented as a range between 585 dpa (the minimum) and 912 dpa. The upper limit was based on matching Jobs growth aspirations of the Sheffield City Region LEP (1,420) over the period 2016 to 2026. - However, PBA have made unjustified and unrealistic assumptions for a number of factors which all suppress the level of housing required to support future employment growth. In particular, we disagree with their assumptions about commuting, double jobbing and household formation rates. Regeneris consider that Doncaster’s housing need over the plan period should be 1,100 dpa to support future economic growth. Regeneris consider that the target of 920 dpa would risk constraining the future economic growth of Doncaster. Strata consider there is potential for the jobs led scenario to underestimate the jobs growth over the full plan period. The associated uplift to the housing requirement will therefore not be sufficient to meet the full needs over the plan period. The Council have identified a requirement for 481 hectares of employment land based on the Job Led scenario, and accounting for the extended plan period between 2032 and 2035. The explanatory text considers that this requirement is met through 117 hectares of land developed between 2015-2018, 201 hectares of land benefiting from planning permission, and 164 hectares of allocated sites. However, there is a discrepancy between the totals in paragraph 4.61 of the Plan and the figures arising from Tables E1 to E8. The sites that benefit from planning permission in tables E1 to E8 equate to 284.09 ha of employment land available within the Plan period. This leads to a total provision of 565.77 hectares of employment land against a requirement of 481 hectares. It should be noted that within the permissions identified in tables E1 to E8 that additional employment land is available, adding to the potential supply. There is therefore a significant mismatch between the level of planned employment provision in Policy 4 and the planned housing provision. Therefore, the housing requirement needs to be uplifted to reflect the identified level of employment land provision. NPPG indicates that consideration can be given to delivery rates, for the last three years completions have been consistently higher than the proposed local plan target. This demonstrates that there is sufficient demand to support a requirement above 920 dwellings per annum. The Councils Economic Forecasts and Housing Needs Assessment (PBA, 2018) considers that an aspirational job led figure, based on the SEP ambitions, would equate to a requirement of 1,073. PBA considered that it would be prudent to plan for between 562 and 1073. There is therefore evidence of both delivery at a higher rate and recently published evidence that indicates a higher need for housing. Strata Homes are concerned that a target of 920 dwellings will not deliver sufficient number and range of affordable homes to meet the identified need for affordable homes in the Borough. In order to deliver 209 affordable dwellings per year, a requirement of at least 1,393 would be required. This assumption of the achievement of an average of 15% affordable housing, which represents the highest achieved over the last three years of monitoring. Strata Homes consider that there is sufficient evidence to pointing to the need for further uplift in the Local Plan housing requirement, based on the significant mismatch between housing and employment land allocations, the need to support the local plans economic ambitions, evidence of delivery and the need to ensure sufficient delivery of affordable housing. Building Supply and Delivery At present based on the Councils figures presented in the Local Plan, a Plan requirement of 18400, completions equating to 3400 and allocations equating to 16055, there is a flexibility of around 1055 dwellings which equates to 5% of the Local Plan Requirement. Strata Homes consider that this is insufficient given the potential for non-delivery and under delivery of sites, particularly from the dependency on a number of large sites. As set out in our response to a number of policies within the plan and specifically Policies 8, 46, 66 and 67, Strata Homes are concerned that some of the policies may undermine the deliverability of sites. Strata Homes have a number of concerns relating to the supply in the Plan in terms of completions, the allocations from permissions and the new allocations. It is noted that the supply attributed to completions appears to be resultant from gross completions rather than net completions. The Plan indicates that completions between 2015 and 2018 equate to 3400, However data in the Residential Land Availability Report indicates that net completions amount to 3211. Which would serve to increase the residual requirement based on an OAN of 920 to at least 15,189, and reduce the also asked a 3,682 new depletions 47.3%). The housing trajectory demonstrates that the Council will struggle to maintain a continuous supply of housing particularly in the later phases of the Plan period. Only four sites are identified as being capable of delivery in the final phases of the Plan period and sites delivering beyond the plan period. In terms of existing commitments it appears that the Council assumes 100% delivery and no discount has been applied. Best Practice and Guidance suggests that at least a 10% discount should be applied on sites with extant planning permission but this could vary depending on site specific constraints and complexity. Strata Homes supports the discounting of sites with planning permission but consider it may be beneficial to include a higher level of discount for large sites to take into account unforeseen circumstances and delivery delays. Strata Homes consider therefore that from a commitments pot of 9,488 dwellings a discount of at least 948 should be applied, however this could feasibly be higher given the history and constraints of a number of sites. Strata Homes is concerned with the reliance on some existing housing sites with planning permission and their potential delivery, particularly as some are fairly historic brownfield sites with viability concerns in market challenging areas. There are a considerable number of outstanding planning permissions in poor market areas, some of which are also constrained by flood risk. Evidence of developer interest in such sites should be a fundamental requirement to provide confidence on delivery. For example, a brief review (provided) of some sites being shown as commitments shows considerable concern. - The Council therefore need a wider choice of sites across a number of different areas and market areas to gain traction and increase build rates. To achieve the housing requirement the Council need at least 30-35 housing outlets operating across the Borough for every year of the Plan and Strata Homes do not believe the Plan can deliver this, particularly in the middle to later years. Strata Homes considers the Council should be more realistic on the potential delivery on sites, particularly on sites which have not commenced preparations of securing the relevant planning permission and developer interest and on build rates. Strata Homes consider that the sites with no planning permission should not be providing completions until 2023/24 (which is two years post adoption) as there is significant work and preparations to commence on site, including time to prepare and submit the planning application, gain planning permission, discharge conditions, legal agreements, site preparations, and commence house building. This process can take around 2 years. Strata Homes considers that the main risks to the delivery of the housing requirement are slippages in the delivery of allocations, longer lead-in times, reduced housing capacity on sites, sites no longer coming forward as result of viability from policy obligations set out in the Local Plan. Given these risks Strata Homes would suggest a greater flexibility is incorporated into the Local Plan especially in light of Strata Homes’ conclusions on the actual housing requirement. Strata Homes would encourage the Council to review the existing commitments to ensure this is still deliverable, whether there is a house builder on board and whether there are any constraints preventing development from this. The council would also ask the Council to look at the prospective deliveries of site allocations to determine whether the delivery rates are appropriate and the sites are deliverable in light of the policy obligations proposed in the Local Plan. Taking into account the above, on a best case scenario Strata Homes consider as a minimum there needs to be circa 3,682 new
homes to be identified in the Plan to account for net completions, and economic growth. This does not account for the uplift required to ensure affordable housing need is met in full which would lead to a requirement of 1,393 dpa and a plan requirement of 27,860. Based on the current supply of 3,211 completions, 9,488 commitments, an allowance for 10% non-implementation, and the currently proposed allocations of 6,567 homes, this would lead to need for a further 9,542 additional homes. Significantly, the scenarios above do not balance housing provision with the additional employment allocations. The additional employment allocations amount to 83.77 hectares above the requirement, this is the equivalent of an additional 3.5 years supply of land. As a result in order to balance the housing provision with the additional employment supply circa 3,850 additional homes would be required, this amounts to an annual requirement of 1292.5 dpa. Strata Homes consider circa 7,532 additional homes are required in order to balance the Housing with Employment supply, account for net completions and appropriate non-implementation rates. These figures assume no changes to the currently identified housing sites, which, in response to policy 3 and policy 6, Strata Homes have raised significant concerns, particularly with regards the deliverability, capacity, and delivery rates of some sites and the overreliance on existing permissions or longstanding allocations. This does not account for additional economic growth associated with the airport. With an increased housing requirement, reduced potential from existing planning permissions sites and incorporation of a flexibility allowance, further land will need to be identified. Strata Homes consider that the appropriate areas and sites to accommodate growth would be: - Site 234 Broad Axe, Scawthorpe, MUA. Proposed Change To overcome the objection and address soundness matters, the Council should: - Increase housing requirements to 1,100 to 1,300 dwellings over the plan period. - Reduce the potential from current commitments and include a non-delivery allowance. - Identify safeguarded land, and - Allocate site at Broad Axe, Scawthorpe, Doncaster site (Site 234)

Response:

A number of ways and means have been submitted to calculate housing and jobs figures for the Local Plan. The Peter Brett’s Report explains the approach taken and ties jobs to housing growth, which includes a significant uplift from the Standard Methodology Figure. The Housing Topic Paper explains how figures have been calculated and where deductions have been made for permissions etc., and also covers the delivery trajectory. The Site Selection Methodology explains how site delivery has been calculated and justifies the proposed build out rates. Other evidence base has been updated for submission. Where adaptations have been made to account for the extension to the plan period since this report was finalised, they have been made to both housing and employment respectively. The difference in the employment figures quoted are the result of tables showing different information. It is accepted that this is confusing and this has been amended to be more clear. The correct employment figure is 481ha and enough employment land has been found to deliver this, and enough housing too meet this arising need too. The standard methodology already makes allowances for affordability ratios and the Local Plan has already almost doubled this figure with the 920dpa requirement so will be delivering more affordable housing which will increase supply/competition and help to bring down affordability even further. Doncaster Council has ambitious plans to deliver more affordable homes, including more council housing, as part of a wider delivery programme. During 2019/20, the first developments will include a range of general needs and more bespoke accommodation. Sites will be funded through a combination of Housing Capital Programme funds; the use of One-for-One capital receipts from Right to Buy sales; and grant funding allocated from the Homes England Shared Ownership and Affordable Housing Programme (SOAHP) 2016/21 should the future bid be successful. Other initiatives and strategies, such as the Council’s Inclusive Growth Plan, are seeking to address issues such as skills and productivity/increasing wages etc. which will also assist people in being able to afford/access housing.
This policy indicates that provision is made for 18,400 dwellings to be delivered throughout the plan period (including supply since 2015 and land allocations going forward), or the equivalent of 920 dwellings each year. Gladman note that the figure of 920 dpa is derived from the June 2018 Economic Forecasts and Housing Needs Assessment (EFHNA), produced for the Council by Peter Brett Associates. The EFHNA identifies a job-led housing need, to match the aspirations of the Sheffield City region of 912 dpa. Gladman are supportive of the proposed housing requirement, particularly in the light of the much less ambitious Standardised Methodology, which sets a starting point for Doncaster of 585 dwellings per annum. However, we believe it is essential that the Council continue to give consideration to the potential for economic growth and job formation across the Borough and to find an appropriate balance between employment growth aspirations of the wider Sheffield City Region and the provision of homes. Gladman also note the lack of uplift for market signals, despite increasing affordability issues. We therefore suggest, that the Council continue to give consideration to the potential for economic growth and job formation across the Borough and to find an appropriate balance between employment growth aspirations of the wider Sheffield City Region and the provision of homes. Gladman also note the lack of uplift for market signals, despite increasing affordability issues. We therefore suggest, that the Council ensure robust evidence is provided to demonstrate deliverability and viability of site allocations, to ensure that the level of growth attributed to each settlement and each tier, can accommodate the level of growth apportioned to them by Policy 3. As stated above, Gladman do not consider it appropriate for the settlement hierarchy, set out within this policy, to cap opportunities for growth in other sustainable, albeit smaller locations. We therefore suggest that all settlement housing figures set out in the policy and its associated table are clearly identified as a minimum.

Summary:
Policy 3 indicates that provision is made for 18,400 dwellings to be delivered throughout the plan period or the equivalent of 920 dwellings each year. Gladman note that the figure of 920 dpa is derived from the June 2018 Economic Forecasts and Housing Needs Assessment (EFHNA), produced for the Council by Peter Brett Associates. The EFHNA identifies a job-led housing need, to match the aspirations of the Sheffield City region of 912 dpa. Gladman are supportive of the proposed housing requirement, particularly in the light of the much less ambitious Standardised Methodology, which sets a starting point for Doncaster of 585 dwellings per annum. However, it is essential that the Council continue to give consideration to the potential for economic growth and job formation across the Borough and to find an appropriate balance between employment growth aspirations of the wider Sheffield City Region and the provision of homes. Gladman also note the lack of uplift for market signals, despite increasing affordability issues. We therefore suggest, that the Council ensure robust evidence is provided to demonstrate deliverability and viability of site allocations, to ensure that the level of growth attributed to each settlement and each tier, can accommodate the level of growth apportioned to them by Policy 3. As stated above, Gladman do not consider it appropriate for the settlement hierarchy, set out within this policy, to cap opportunities for growth in other sustainable, albeit smaller locations. We therefore suggest that all settlement housing figures set out in the policy and its associated table are clearly identified as a minimum.

Response:
As demonstrated in the Housing Topic Paper, the Local Plan is proposing an appropriate housing requirement that will meet the needs of Doncaster and its aspirations for growth. The Statement of Common Ground has shown that adjacent authorities are not looking to Doncaster to meet any of their identified housing requirements. The Plan includes monitoring mechanisms which will inform the need to review the Plan at least every five years and update where necessary. The Local Plan does have to identify a requirement and targets for individual settlements - these, however, are not maximum caps on development.
3.5 The level of housing development to be delivered is set out in Policy 3, which states that the Council will seek 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). 3.6 Paragraph 59 of the National Planning Policy Framework (the Framework) sets out the Government’s objective of significantly boosting the supply of homes, through the identification of a sufficient amount and variety of land where it is needed and to meet the needs of groups with specific housing requirements [authors own emphasis]. 3.7 The SPRU report provided at Appendix 1 assesses the soundness of the proposed jobs-led housing requirement and the implications for the proposed spatial strategy. (SEE EMAIL FOR Appendix 1) 3.8 For the reasons outlined within the report, there are found to be substantial soundness failings with the draft Local Plan resulting from a failure to test an appropriate reasonable alternative based on meeting the strategic priorities for economic development over a full 15-year plan period. These issues are compounded based on treating the housing requirement from 2018-2033 as a ‘residual total’ to account for perceived oversupply in the period 2015-2018, which has not been adequately justified. 3.9 The Council’s approach fails to accurately reflect the strategic priorities and future economic potential of the Sheffield City Region and further assessment of the proposed requirement is recommended to reflect the requirements of the revised Strategic Economic Plan (once published) and to consider recent trends in jobs growth and housing delivery across the sub-region. This is anticipated to lead to a reassessment of current and future demographic trends in relation to future labour supply. 3.10 The report also concludes that arbitrary constraints to the requirement for additional development are applied, which will lead to an overreliance on extant planning commitments and historic allocations in previous iterations of the development plan. The implications of this in terms of prospects for maintaining a five year supply of deliverable sites and meeting the housing needs of different groups have not been fully assessed, however it is anticipated that there could be a failure to meet housing need, particularly in respect of affordable housing in the short to medium term, as the physical and viability related constraints that have prevented these sites being delivered to date may persist. 3.11 The report concludes that these issues are capable of remedy within the Council’s broad emerging approach to managing the distribution of growth across the spatial strategy. This acknowledges that significantly greater levels of potentially suitable growth could be provided at different tiers of the settlement hierarchy, in-particular Main Towns at Tier 2. We endorse the Council’s position that such locations are appropriate to accommodate up to 10% of the economic-led component of the housing requirement. We further endorse that this broad approach to distribution should be treated flexibly. Recommendation 3.12 The Local Plan should be updated to reflect the housing requirement of 1,073 dwellings per annum for the plan period to 2035. Justification 3.13 For the reasons set out above and within the appended SPRU report, it is correct to accommodate growth based on meeting requirements under the full assessment of jobs-led growth (1,073 dpa) for the full plan period to 2035.

Summary:
There are substantial soundness failings with the draft Local Plan, resulting from a failure to test an appropriate reasonable alternative based on meeting the strategic priorities for economic development over the full 15 year plan period. The issue is compounded based on treating the 2018 - 33 housing requirement as a residual total to account for perceived oversupply in 2015 - 18. This fails to reflect the strategic priorities and future economic potential of the Sheffield City Region and further assessment of the requirement is recommended to reflect the requirements of the upcoming Strategic Economic Plan. This should consider recent trends in jobs growth and housing delivery across the sub-region. This is anticipated to lead to a reassessment of current and future demographic trends in relation to future labour supply. Arbitrary constraints to the requirement for additional development are applied which lead to an overreliance on extant planning commitments historic allocations from the UDP. This has impacts for 5 year supply and meeting the needs of different groups, which has not been assessed. It is anticipated that there could be a failure to meet housing need particularly in respect of affordable housing in the short to medium term, as the physical and viability related constraints that have prevented these sites being delivered to date may persist. To remedy this, significantly greater levels of suitable growth could be provided across the hierarchy, especially the Main Towns. Support that such areas are appropriate to accommodate up to 10% of the economic led component of the housing requirement. This broad approach should be flexible. The Local Plan requirement should be 1,073 dpa to 2035 - this is to accommodate growth based on meeting the requirements under the full assessment of jobs led growth.

Response:
As demonstrated in the Housing Topic Paper, the Local Plan is proposing an appropriate housing requirement that will meet the needs of Doncaster and its aspirations for growth. The Local Plan cannot meet in full its need for affordable housing, to do so would require an excessively large housing requirement which would be undeliverable. The Local Plan does, however, include policy requirements to deliver as much affordable housing as is economically viable.
Policy 3: Level & Distribution of Growth

Chapter 4: Strategic Approach

Tests of Soundness:

Justified

Comment:

2.12 The level of housing development to be delivered is set out in Policy 3, which states that the council will seek 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). 2.13 Paragraph 59 of the National Planning Policy Framework (the 'Framework') sets out the Government's objective of significantly boosting the supply of homes, through the identification of a sufficient amount and variety of land where it is needed and to meet the needs of groups with specific housing requirements [authors own emphasis]. 2.14 The SPRU report provided at Appendix 2 assesses the soundness of the proposed jobs-led housing requirement and the implications for the proposed spatial strategy. (SEE EMAIL FOR Appendices) 2.15 For the reasons outlined within the report, there are found to be substantial soundness failings with the draft Local Plan resulting from a failure to test an appropriate reasonable alternative based on meeting the strategic priorities for economic development over a full 15-year plan period. These issues are compounded based on treating the housing requirement from 2018-2033 as a 'residual total' to account for perceived oversupply in the period 2015-2018, which has not been adequately justified. 2.16 The Council's approach fails to accurately reflect the strategic priorities and future economic potential of the Sheffield City Region and further assessment of the proposed requirement is recommended to reflect the requirements of the revised Strategic Economic Plan (once published) and to consider recent trends in jobs growth and housing delivery across the subregion. This is anticipated to lead to a reassessment of current and future demographic trends in relation to future labour supply. 2.17 The report also concludes that arbitrary constraints to the requirement for additional development are applied, which will lead to an overreliance on extant planning commitments and historic allocations in previous iterations of the development plan. The implications of this in terms of prospects for maintaining a five year supply of deliverable sites and meeting the housing needs of different groups have not been fully assessed, however it is anticipated that could be a failure to meet housing need, particularly in respect of affordable housing in the short to medium term, as the physical and viability related constraints that have prevented these sites being delivered to date may persist. 2.18 The report concludes that these issues are capable of remedy within the Council's broad emerging approach to managing the distribution of growth across the spatial strategy. This acknowledges that significantly greater levels of potentially suitable growth could be provided at different tiers of the settlement hierarchy, in particular Main Towns at Tier 2. We endorse the Council's position that such locations are appropriate to accommodate up to 10% of the economic-led component of the housing requirement. We further endorse that this broad approach to distribution should be treated flexibly. 2.19 In particular we consider the opportunity represented by the redevelopment of this underutilised and previously developed site at Brodsworth Quarry should be identified as a specific location for mixed use development as it represents a sustainable location capable of delivering economic, social and environmental gains, while avoiding the use of agriculture and or areas at risk from flooding. Recommendation 2.20 The Local Plan should be updated to reflect the housing requirement of 1,073 dwellings per annum for the plan period to 2035. 2.21 Brodsworth Quarry should be identified as a location for mixed use development. Justification 2.22 For the reasons set out above and within the appended SPRU report, it is correct to accommodate growth based on meeting requirements under the full assessment of jobs-led growth (1,073 dpa) for the full plan period to 2035 and for a new allocation to be made at Brodsworth Quarry to assist in meeting this requirement in the most sustainable way.

Summary:

Policy 3 of the Local Plan states that the Council will seek the facilitate the delivery of at least 920 (net) new homes each year. However there are substantial soundness failings within the Plan as there has been a failure to test appropriate reasonable alternatives based on economic development strategic priorities over a full 15 year period. This is compounded by treating the housing requirement from 2018 - 2033 as a 'residual total' to account for perceived oversupply in the period 2015-2018 - this has not been adequately justified. The Council's approach fails to accurately reflect the priorities and economic potential of the Sheffield City Region and further assessment of the proposed requirement is needed to reflect the revised SCR Economic Plan (once published) and also to consider recent trends in job growth and housing delivery across the sub region. The appendix attached to the representation (summarised below) concludes that arbitrary constraints to the requirement for additional development are applied, which lead to an over reliance on extant planning commitments and historic allocations. The implications in terms of maintaining a five year supply of deliverable sites and meeting the housing needs of different groups have not been fully assessed. It is anticipated that there could be a failure to meet (affordable) housing need in the short to medium term. The appendix concludes that these issues can be remedied within the Council's broad emerging approach to managing the distribution of growth. Greater levels of potentially suitable growth could be provided at different tiers of the settlement hierarchy, in particular the Main Towns. We endorse the position that such locations are appropriate for up to 10% of the economic-led component of the housing requirement. We endorse that this broad approach to distribution should be treated flexibly. Brodsworth Quarry should be identified as a specific location for mixed use development - is a sustainable location which is currently an under utilised, previously developed site. The Local Plan should be updated to reflect the housing requirement of 1,073 dpa. Summary of appendix Although the plan states it covers the period 2015 to 2035 it fails to make adequate provision for the post adoption period 2020 to 2035 because: a) Local Plan Table 5 shows that allocations are made for the period 2018 to 2033 resulting in allocations covering just 13 years from adoption of the Plan. This is contrary to NPPF paragraph 22 (a minimum of 15 years from adoption). b) the adopted approach reduces the overall level of housing requirement to be provided for following adoption by using a 'residual' calculation to
reduce the future planned requirement on the basis of higher rates of completions prior to the adoption of the plan. There is no support in either the Framework or the PPG to "discount" future levels of requirement based on past levels of "over provision". Such overprovision may only be used to offset any shortfalls against requirements from previous years (PPG Paragraph: 032 Reference ID: 68-032-20190722). c) The employment led housing requirement of 912 dpa is based upon a projection for the period 2016 to 2016 i.e. just the first 6 years after the adoption of the plan rather than the requirement for the plan period as a whole. This is contrary to the Framework paragraph 20 which requires provision be made for 15 years from the adoption of the plan. It is correct that the plan should provide for a figure above the minimum required by the application of the standard method. There is a growth strategy in place for the area which is already being delivered and as such a higher level of growth than the standard method is justified (PPG Paragraph: 010 Reference ID: 2a-010-20190220). From adoption, the Local Plan will make provision for 882 dpa but this is not an appropriate level of housing requirement for the following reasons: a) The justification for 882 dpa as a response to the planned levels of economic growth is flawed as it: i) Discounts previous high levels of completions prior to adoption from the future annual requirement which is contrary to the PPG ii) Fails to respond to the evidence of employment growth for the whole plan period: The employment led housing requirement of 882 dpa is based upon a requirement figure of 912 dpa for the period 2016 to 2026 as such it covers just the first 6 years of the plan period after adoption. The requirement for the plan period (2015 to 2032) and the correct interpretation of the council’s evidence base is that there is a requirement for 1,073 dpa iii) Fails to provide for specific allocations in accordance with the spatial strategy and distribution of development to support economic growth for the final years of the plan period. b) Past Completion Rates: Recent rates suggest a much higher demand for housing. Recent levels of completions are over 1,000 dpa and reflect the growing market demand and local economy. These rates of completions are significantly above (almost double) the outcome of the standard method which suggests 550 dpa (2019 - 2029 using the 2014 DCLG projections and the most up-to-date evidence on affordability). The PPG requires Authorities to take such evidence into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests (Paragraph: 010 Reference ID: 2a-010-20190220). Objection to the Sustainability Appraisal The Sustainability Appraisal fails to consider reasonable alternatives. The SA considers the impact of the following: a. The planned housing allocations to meet the need to 2033 not 2035 b. The planned provision of 889 dpa for the period 2018 to 2033 and not the higher requirement based on meeting future economic growth which would be 1,073 dpa for the period 2015-2032. The reasonable alternatives that the SA has failed to consider are as follows: a. The impact of making housing allocations to meet the need to 2035 b. The impact of making housing allocations to accommodate 1,073 dpa for the period 2015-2032

Response:
As demonstrated in the Housing Topic Paper, the Local Plan is proposing an appropriate housing requirement that will meet the needs of Doncaster and its aspirations for growth.
Objection is made to this Policy. The level of housing growth for the Plan period 2015-2035 is set at 18,400 new homes. The Plan seeks to allocation land for 15 years of 13,230 new homes having deducted the completions from the first three years of the Plan period up to 2018. The Plan should allocate land for the complete Plan Period and on the basis of the Policy as drafted only takes account of 18 of the 20 year plan period. There is no explanation of the remaining 2 years. The housing requirement is set out as a range from 920 dwellings per annum, down to 882 dwellings per annum and indicates that this will be reviewed through the plan period to reflect updated projections and the need for affordable homes. It is unclear from the Plan on what basis revised requirements would be considered and how this would affect the land allocations or future requirements. The Policy as drafted is not clear if provision is being made for the entire 18,400 new homes or for a lesser figure. There is no clear explanation of this in the supporting text. Paragraph 4.38 of the text indicates that the requirement is 912 homes per year over the Plan Period, which is 18,240 new homes net. There is no explanation of the net and gross figures in the text. The plan should clearly set out the gross requirement over the plan period, what deductions are made for completions, the residual requirement for the remainder of the plan period, and the allocations therefore made. Net and gross figures would assist the ability to understand the Plan. The range of figures in the table for the settlements in the hierarchy are difficult to match up with the overall requirements. The figures for the bottom end of the range add to 10,850 housing allocations and the top of the range add to 15,390, neither of which figures match the 13,230 in the first part of the Policy. The Plan is therefore unclear and imprecise about the housing allocation and how this is justified compared to the report relied upon which sets out the housing need. Paragraph 4.40 seeks to explain the distribution of the housing baseline figure and the economic growth housing figure. It sets out that not all of the baseline figure is allocated to the service function settlements and some 632 dwellings are then reallocated to the higher order settlements. These settlements already have the additional growth from the economic led housing. The distribution should be reapportioned as set out in our comments above to apportion the whole requirement of housing need to the sustainable settlements. The explanation in para 4.41 that 4,905 homes of the allocation requirement is directed to the urban area and main towns is misconceived for the reasons stated above. The plan does not explain how this has been worked out in exact allocations, and appears to be subject to interpretation by a future topic paper. On its face the Plan is not justified in Policy 3 about the following matters. - What is the overall requirement - What is the actual allocation - Why is there is distinction between baseline housing growth and economic growth in distribution terms - What is going to each settlement and why The proposed allocations should be listed in Policy 6 in a comprehensive table to enable a proper understanding and reading of the Plan. A plan of each site should also be included in the plan document, to ensure clarity about the site boundaries.  

Summary:

Objects to policy. The plan should not deduct completions from the first 3 years of the plan period and allocate enough land for the whole plan period as the policy as drafted only accounts for 18 of the 20 years with no explanation of the remaining 2 years. Expressing the housing requirement as a range is not clear on what basis the revised requirements would be considered and how it would affect land allocations or future requirements. Not clear if provision is being made for the entire 18,400 new homes or for a lesser figure. Para 4.38 indicates the requirement is 912dpa over the plan period which is 18,240 new homes. The plan should set out the gross requirement over the plan period with deductions for completions, the residual requirement for the remainder of the plan period and the allocations therefore made. Net and gross figures would assist the ability to understand the plan. The range of figures in the table for settlements in the hierarchy are difficult to match up with the overall requirements. The bottom end of the range add up to 10,850 and the top of the range 15,390 neither of which match the 13,230 in the first part of the policy. The remaining 632 units from the baseline (Defined Villages) should be reallocated to all settlements in the top 3 tiers of the hierarchy rather than to just the Main Urban Area and Main Towns. The explanation in para 4.41 that 4,905 homes of the allocation requirement is directed to the urban area and main towns is misconceived for the reasons stated above. The plan does not explain how this has been worked out in exact allocations, and appears to subject to interpretation by a future topic paper. On its face the Plan is not justified in Policy 3 about the following matters: What is the overall requirement; What is the actual allocation; Why is there is distinction between baseline housing growth and economic growth in distribution terms; and, What is going to each settlement and why? The proposed allocations should be listed in Policy 6 in a comprehensive table to enable a proper understanding and reading of the Plan. A plan of each site should also be included in the plan document, to ensure clarity about the site boundaries.
Sources of supply for the remaining 2 years of the plan period where allocations are not being made is identified including: supply at settlements with a housing allocation above their requirement; permissions from small sites 1-4 units as at April 2018; all permissions at the Defined Villages 5+ units as at April 2018; large sites still developing in these final 2 years; any housing in line with Policy 7 at the Airport (up to 1,200 new homes); and, any housing on Reserve Sites. Policy 6 provides further detail on the total size and sources of the allocated housing requirement which is 16,115 net dwellings with completions in addition to this for the first 3 years of the plan (3,400 net units) giving a plan period housing supply of 19,515 net dwellings against a requirement of 18,400 (+1,115 units). A further 2,085 units are allocated but estimated to deliver beyond 2035.

The ranges provide flexibility when allocating sites and each settlement is not required to allocate to the top of the range in order for the overall housing requirement to be met hence adding the bottom and/or top of the ranges do not equal the overall requirement and hence the mid point figure within these ranges will reflect the overall requirement. The leftover baseline is considered appropriate to redirect to the top 2 tiers of the hierarchy given these are the most sustainable settlements with largest populations etc. To answer the specific points made:

- What is the overall requirement? The plan period requirement (2015-2035) 18,400 net dwellings The residual plan period requirement (2018-2035) 13,235 net dwellings
- What is the actual allocation? Completions first 3 years of the plan period 3,400 net dwellings The plan period allocation 2018-2035 16,115 net dwellings Completions + plan period allocations 19,515 net dwellings (+1,115 net units compared to plan period requirement)
- Why is there is distinction between baseline housing growth and economic growth in distribution terms? See responses to Policy 2 for the distinction between the baseline and economic growth led housing distribution?
- What is going to each settlement and why? See response to Policy 2 as well as settlement figures set out in Chapter 16 which explains final housing allocations to each. Allocations should be listed in Policy 6 in a comprehensive table to enable a proper understanding and reading of the Plan.
- These are set out in Chapter 16 by settlement level as well as whether permissioned/non-permissioned already and would be unnecessary duplication. A plan of each site should also be included in the plan document, to ensure clarity about the site boundaries. The majority of non-permissioned sites have a plan included in the Appendices (Developer Requirements) and detailed boundaries shown on the Policies Map.
We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Consistent with national

Area: Chapter 4: Strategic Approach

Policy: Policy 3: Level & Distribution of Growth

Tests of Soundness: Positively prepared

Consistent with national

Comment:

Policy 3 is not considered to be sound as it is not positively prepared, justified or consistent with national policy for the following reasons: The Council has continued to identify a net housing requirement of 920 dwellings per annum (dpa) over the plan period 2015-2035. Paragraph 60 of the NPPF 2019 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 demographic trends and market signals’. It should be noted that the Standard Method identifies a minimum annual housing need figure, it does not produce a housing requirement figure. It should also be noted that 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. The National Planning Practice Guidance (NPPG) (ID: 2a-010) goes on to states 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 of the Standard Method. The Peter Brett Economic Forecasts and Housing Needs Assessment (2018) identifies a demographic starting point from the 2014-based household projections of 562dpa, which 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. The Council identify that the housing requirement will be expressed as a range with the bottom of the range being the Local Housing Need (LHN) figure and the top of the range being the 920dpa. As set out above it is not considered that the LHN produced from the Standard Method would provide an appropriate housing requirement. With the Sheffield City Region jobs growth aspirations applied a housing need of 1,073dpa is identified. It is clear that there are circumstances identified that would require a housing requirement figure which is significantly greater than the outcome of the Standard Method. Lastly, the housing requirement should not be treated as a cap because this would be inconsistent with the NPPF’s requirement to support the Government’s objective to boost the supply of homes. It is important that sufficient housing is allocated to match the proposed level of economic growth, in order to provide sufficient homes for the labour force required to service the jobs created. Not providing a sufficient number of homes to match the economic growth aspirations in the Borough can lead to consequences, such as the formation of unsustainable commuting patterns due to an insufficient number of homes for people wishing to move to Doncaster. The NPPF is clear in paragraph 9 that policies should play an active role in guiding development towards sustainable solutions and in doing so should take local circumstances into account. It DMBC wish to encourage economic growth within the Borough this should be done in a sustainable manner.

Summary:

The Standard Method identifies a minimum annual housing need figure, it does not produce a housing requirement figure. The Peter Brett Economic Forecasts and Housing Needs Assessment (2018) identifies a demographic starting point from the 2014-based household projections of 562dpa, which 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. It is important that sufficient housing is allocated to match the proposed level of economic growth, in order to provide sufficient homes for the labour force required to service the jobs created. Not providing a sufficient number of homes to match the economic growth aspirations in the Borough can lead to consequences, such as the formation of unsustainable commuting patterns due to an insufficient number of homes for people wishing to move to Doncaster.

Response:

As demonstrated in the Housing Topic Paper, the Local Plan is proposing an appropriate housing requirement that will meet the needs of Doncaster and its aspirations for growth.
Objection is made to this Policy  The level of housing growth for the Plan period 2015-2035 is set at 18,400 new homes. The Plan seeks to allocate land for 15 years of 13,230 new homes having deducted the completions from the first three years of the Plan period up to 2018. The Plan should allocate land for the complete Plan Period and on the basis of the Policy as drafted only takes account of 18 of the 20 year plan period. There is no explanation of the remaining 2 years. The housing requirement is set out as a range from 920 dwellings per annum, down to 882 dwellings per annum and indicates that this will be reviewed through the plan period to reflect updated projections and the need for affordable homes. It is unclear from the Plan on what basis revised requirements would be considered and how this would affect the land allocations or future requirements. The Policy as drafted is not clear if provision is being made for the entire 18,400 new homes or for a lesser figure. There is no clear explanation of this in the supporting text. Paragraph 4.38 of the text indicates that the requirement is 912 homes per year over the Plan Period, which is 18,240 new homes net. There is no explanation of the net and gross figures in the text. The plan should clearly set out the gross requirement over the plan period, what deductions are made for completions, the residual requirement for the remainder of the plan period, and the allocations therefore made. Net and gross figures would assist the ability to understand the Plan. The range of figures in the table for the settlements in the hierarchy are difficult to match up with the overall requirements. The figures for the bottom end of the range add to 10,850 housing allocations and the top of the range add to 15,390, neither of which figures match the 13,230 in the first part of the Policy. The Plan is therefore unclear and imprecise about the housing allocation and how this is justified compared to the report relied upon which sets out the housing need. The proposed allocations should be listed in Policy 6 in a comprehensive table to enable a proper understanding and reading of the Plan. A plan of each site should also be included in the plan document, to ensure clarity about the site boundaries.

Summary:
Objects to Policy 3 - Should allocate land for the complete plan period as current approach only accounts for 18 of the 20 year plan period and no explanation for the remaining 2 years. The housing requirement set as a range and states will be reviewed throughout the plan period but unclear on what basis the revised requirements would be considered and how this would affect allocations for future requirements. The policy is not clear if provision is being made for the entire 18,400 new homes of a lesser amount and no clear explanation of net or gross figures. Para 4.38 indicates requirement is 912 dpa over plan period which is 18,240 new homes. The plan should clearly set out the gross requirement over the plan period, what deductions are made for completions, the residual requirement for the remainder of the plan period, and the allocations therefore made. The range of figures in the table for the settlements in the hierarchy are difficult to match up with the overall requirements. The figures for the bottom end of the range add to 10,850 and the top of the range add to 15,390, neither of which figures match the 13,230 in the first part of the Policy. All allocations should be set out in Table 6 and there needs to be a plan of each site included in the plan.

Response:
Sources of supply for the remaining 2 years of the plan period where allocations are not being made is identified including; supply at settlements with a housing allocation above their requirement; permissions from small sites 1-4 units as at April 2018; all permissions at the Defined Villages 5+ units as at April 2018; large sites still developing in these final 2 years; any housing in line with Policy 7 at the Airport (up to 1,200 new homes); and, any housing on Reserve Sites. Policy 6 provides further detail on the total size and sources of the allocated housing requirement which is 16,115 net dwellings with completions in addition to this for the first 3 years of the plan (3,400 net units) giving a plan period housing supply of 19,515 net dwellings against a requirement of 18,400 (+1,115 units). A further 2,085 units are allocated but estimated to deliver beyond 2035. The ranges provide flexibility when allocating sites and each settlement is not required to allocate to the top of the range in order for the overall housing requirement to be met hence adding the bottom and/or top of the ranges do not equal the overall requirement and hence the mid point figure within these ranges will reflect the overall requirement. The leftover baseline is considered appropriate to redirect to the top 2 tiers of the hierarchy given these are the most sustainable settlements with largest populations etc. To answer the specific points made: - What is the overall requirement  The plan period requirement (2015-2035) 18,400 net dwellings The residual plan period requirement (2018-2035) 13,235 net dwellings - What is the actual allocation? Completions first 3 years of the plan period 3,400 net dwellings The plan period allocation 2018-2035 16,115 net dwellings Completions + plan period allocations 19,515 net dwellings (+1,115 units compared to plan period requirement) - Why is there is distinction between baseline housing growth and economic growth in distribution terms? See responses to Policy 2 for the distinction between the baseline and economic growth led housing distribution? - What is going to each settlement and why? See response to Policy 2 as well as settlement figures set out in Chapter 16 which explains final housing allocations to each. Allocations should be listed in Policy 6 in a comprehensive table to enable a proper understanding and reading of the Plan. - These are set out in Chapter 16 by settlement level as well
as whether permissioned/non-permissioned already and would be unnecessary duplication. A plan of each site should also be included in the plan document, to ensure clarity about the site boundaries. The majority of non-permissioned sites have a plan included in the Appendices (Developer Requirements) and detailed boundaries shown on the Policies Map.
2.10 The proposed housing distribution within the draft plan has a strong focus on the Main Urban Area with 50% of development proposed in the Doncaster Main Urban Area, followed by 40% in second tier (Main Towns) locations, 10% in Services Towns and Larger Villages and limited development in Defined Villages. The proposed distribution is based on the Settlement Background Paper which forms a settlement hierarchy and informs the location of housing and employment sites. 2.11 The Publication Doncaster Local Plan identifies Finningley as one of 10 Service Towns/Villages which will provide about 10% of the Borough’s total housing requirement during the plan period. Specifically, Finningley is identified to deliver 55 dwellings in the plan period (50 of which are based on existing permissions) 2.12 The Sustainability Appraisal for the Public Local Plan discounts Site 189 and all other alternatives within Finningley from allocation based on the proposed housing distribution and the level of housing already committed within the settlement. We object to this approach and consider it to be unsound. 2.13 It is not considered appropriate that such limited levels of allocations have been identified in reasonably sized settlements such as Finningley. The only justification put forward for failing to allocate new sites for development is based on existing permissions within these settlements. However, these sites have yet to be delivered and may suffer from issues including viability that could impact future delivery. 2.14 Settlements including Finningley have been identified as ‘Larger Villages’ within the settlement hierarchy. There is a population of over 6,800 people in the immediate area surrounding the airport (Auckley, Blaxton and Hayfield Green) and as such it is larger than settlements such as Tickhill (over 5,200 people) and Askern (over 5,500 people) and is of a similar size to Edlington (7,500). However the draft Plan proposes to retain existing settlement boundaries in Auckley and Finningley, allowing only infill small scale affordable housing. 2.15 The proposed approach to the delivery of housing, as drafted, fundamentally fails to recognise the emphasis within the Framework on the deliverability of housing and the need to support the prosperity of settlements outside of the main urban area. 2.16 The draft Local Plan proposes a housing target based on economic growth objectives, a substantial element of which will be linked to the growth of the airport. The approach to limiting the expansion of those settlements surrounding the airport, together with the objectives of draft Policy 7, which seeks to support ‘windfall’ housing development linked to employment growth within the airport sites, risks creating an isolated community and fails to take the opportunity to ensure the future sustainability of existing communities located in close proximity to the airport. 2.17 While settlements such as Finningley may rely on towns to provide essential services, the need to sustain the existing services will require additional employment and housing. The continuing trend for a reduction in household size means downsizing will undercut the customer/user thresholds to which current amenities and facilities have become accustomed. This poses a significant threat to the current level of sustainability enjoyed by the settlement. 2.18 The housing allocations requirements should not be based purely on the hierarchy of a settlement as there are a number of considerations namely urban capacity, need and demand for housing, regeneration, environmental and social considerations which need to be taken into account to ensure the growth of settlements in a sustainable manner. In the case of Finningley, the proximity to the DSA Masterplan area is a particularly relevant consideration in order to ensure support for the proposed economic strategy. Recommendation 2.19 The distribution of housing provision within Policy 3 - Service Towns and Larger Villages should be increased to meet the updated housing requirement, and reapportioned (or alternatively flexibility introduced) to support the delivery of a higher proportion of the housing within sustainable and desirable locations close to economic growth. Justification 2.20 The Local Plan as drafted is overly reliant on a significant quantum of sites within the Main Urban Area. This approach relies on the delivery of a notable number of large sites, which will require substantial enabling infrastructure in order to deal with constraints that may include contamination and highways infrastructure upgrades as well as drainage and other matters. 2.21 The growth potential of a number of Service Towns and Larger Villages has been underplayed and that Finningley, together with neighbouring Auckley/Hayfield Green should have an increased allocation of housing land within these settlements, in order to capture the regeneration opportunities provided by the proximity to the airport and to deliver housing in sustainable locations where there is a recognised demand. 2.22 Given the size of the committed level of airport related employment on the airport itself it is also considered that the current approach fails to consider the obvious beneficial impact of concentrating further employment and residential development in close proximity to the airport, especially as there are large areas of despoiled land that are well related to public transport infrastructure and can be developed for mixed use schemes. 2.23 The limited housing target apportioned to Finningley, as well as neighbouring Auckley/Hayfield Green does not appear to be appropriate and there seems to be no justification of not meeting some level of demand and need in these locations. This approach is likely to result in not only a missed opportunity to support the projected economic growth but also lead to the decline of those settlements. 2.24 The potential for redevelopment of sustainable sites such as the Higgin’s site in these areas should be realised, where deliverable, in order to support the long term viability of these areas. By reviewing existing Countryside designations around these settlements, boundaries can be rationalised to allocate land for development to serve the purposes of these policy areas. 2.25 New housing allocations are considered to be an appropriate response to accommodating further development in these locations.
Summary:
Object to Sustainability Appraisal which discounts site 189 based on the proposed housing distribution and the level of housing already committed within the settlement. The approach is unsound. The housing delivery approach fails to recognise the emphasis within the Framework on the deliverability of housing and the need to support the prosperity of settlements outside of the main urban area. The draft Local Plan proposes a housing target based on economic growth objectives limiting the expansion of settlements surrounding the airport and a draft Policy 7, which seeks to support ‘windfall’ housing development linked to employment growth within the airport sites, risks creating an isolated community and fails to take the opportunity to ensure the future sustainability. Settlements such as Finningley rely on towns to provide essential services but need to sustain the existing services will also require additional employment and housing. Housing allocations requirements should not be based solely on the hierarchy of a settlement. The council should also consider urban capacity, need and demand for housing, regeneration, environmental and social considerations. Cites DSA masterplan as an economic example. Distribution of housing provision within Policy 3 - Service Towns and Larger Villages is underemphasised and housing target should be increased, because of over reliance of site proposals in main urban area will need additional drainage and infrastructure upgrades. Housing target for Finningley and Auckley/Hayfield Green is not appropriate and there seems to be no justification. Should realise the potential of the Higgins site and review countryside designation and rationalising settlement boundary.

Response:
As demonstrated in the Housing Topic Paper, the Local Plan is proposing an appropriate housing requirement that will meet the needs of Doncaster and its aspirations for growth. The Local Plan includes targets for Finningley and for Auckley-Hayfield Green which are deliberately separate to any additional housing that may be considered appropriate for Auckley-Hayfield Green should sufficient jobs be generated at the Airport.
2.1 The Doncaster "Inclusive Growth Plan" is supported. 2.2 The level of housing development to be delivered is set out in Policy 3, which states that the Council will seek 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). 2.3 Paragraph 59 of the National Planning Policy Framework (the 'Framework') sets out the Government’s objective of significantly boosting the supply of homes, through the identification of a sufficient amount and variety of land where it is needed and to meet the needs of groups with specific housing requirements [authors own emphasis]. 2.4 The SPRU report provided at Appendix 1 assesses the soundness of the proposed jobs-led housing requirement and the implications for the proposed spatial strategy. (SEE EMAIL FOR Appendix) 2.5 For the reasons outlined within the SPRU report, DLP objects to Policy 3 of the draft Local Plan as there are found to be substantial soundness failings with the draft Local Plan resulting from a failure to test an appropriate reasonable alternative based on meeting the strategic priorities for economic development over a full 15-year plan period. These issues are compounded based on treating the housing requirement from 2018-2033 as a 'residual total' to account for perceived oversupply in the period 2015-2018, which has not been adequately justified. 2.6 The Council’s approach fails to accurately reflect the strategic priorities and future economic potential of the Sheffield City Region and further assessment of the proposed requirement is recommended to reflect the requirements of the revised Strategic Economic Plan (once published) and to consider recent trends in jobs growth and housing delivery across the sub-region. This is anticipated to lead to a reassessment of current and future demographic trends in relation to future labour supply. 2.7 The SPRU report also concludes that arbitrary constraints to the requirement for additional development are applied, which will lead to an overreliance on extant planning commitments and historic allocations in previous iterations of the development plan. The implications of this in terms of prospects for maintaining a five year supply of deliverable sites and meeting the housing needs of different groups have not been fully assessed, however it is anticipated that there could be a failure to meet housing need, particularly in respect of affordable housing in the short to medium term, as the physical and viability related constraints that have prevented these sites being delivered to date may persist. 3.1 The SPRU report concludes that these issues are capable of remedy within the Council’s broad emerging approach to managing the distribution of growth across the spatial strategy. This acknowledges that significantly greater levels of potentially suitable growth could be provided at different tiers of the settlement hierarchy, in particular Main Villages at Tier 2. We endorse the Council’s position that Main Towns are appropriate locations to accommodate up to 10% of the economic-led component of the housing requirement. However, we also recommend the consideration of Tier 3 - Service Towns and Larger Villages as potential locations for additional growth, where sustainable growth opportunities are identified. Recommendation 2.8 The Local Plan should be updated to reflect the housing requirement of 1,073 dwellings per annum for the plan period to 2035. Justification 2.9 For the reasons set out above and within the appended SPRU report, it is correct to accommodate growth based on meeting requirements under the full assessment of jobs-led growth (1,073 dpa) for the full plan period to 2035.

Summary:
Supports inclusive growth plan. Policy 3, Local Plan should be updated to reflect the housing requirement of 1,073. SPRU report provided at Appendix 1 assesses the soundness of the proposed jobs-led housing requirement and the implications for the proposed spatial strategy. The work fails to test an appropriate reasonable alternative based on meeting the strategic priorities. The work fails to accurately reflect the strategic priorities and future economic potential of the Sheffield City Region and further assessment of the proposed requirement is recommended to reflect the requirements of the revised Strategic Economic Plan (once published) and to consider recent trends in jobs growth and housing delivery across the sub-region. SPRU report also concludes that arbitrary constraints to the requirement for additional development are applied, which will lead to an overreliance on extant planning commitments and historic allocations. Issues can be remedied by managing the distribution of growth across the spatial strategy. Endorses Council position that Main Towns as appropriate locations but recommend the consideration of Tier 3 - Service Towns and Larger Villages as potential locations for additional growth.

Response:
As demonstrated in the Housing Topic Paper, the Local Plan is proposing an appropriate housing requirement that will meet the needs of Doncaster and its aspirations for growth.
The target delivers the minimum level of housing need for Doncaster based on the standard method 201902020. However, PBA have made unjustified and unmerited representations. Regeneris Consulting to review the OAN and the Economic Forecasts and Housing Needs Assessment (2018). The Regeneris report is attached to these representations. Regeneris conclude that: - The target delivers the minimum level of housing need for Doncaster based on the standard method (585 dpa) and makes an upward adjustment to support economic growth. - The upward adjustment was based on evidence produced by PBA which recommended housing need is presented as a range between 585 dpa (the minimum) and 912 dpa. The upper limit was based on matching Jobs growth aspirations of the Sheffield City Region LEP (1,420) over the period 2016 to 2026. - However, PBA have made unjustified and unrealistic assumptions for a number of factors which all suppress the level of housing required to support future employment growth. In particular, we disagree with their assumptions about commuting, double jobbing and household formation rates. Regeneris considers that: - Doncaster has been one of the fastest growing economies in Yorkshire and Humber. The district has created around 24,000 jobs between 2000 and 2017, representing a growth rate of 1.1% p.a - Doncaster’s key asset is its connectivity by road, rail and air which has made it a highly attractive location for inward investment, particularly for industrial and logistics occupiers, with over 1.1m sq m of industrial/warehouse space taken up since 2010. - The strong performance is also due to a significant improvement in key economic indicators, including skills and levels of enterprise. The business start-up rate has more than doubled since 2010 and is now in line with the national average. These improvements have removed a key barrier to growth and mean that Doncaster is well placed to continue its high rate of growth. - The Local Plan has set a target of delivering 481 hectares of employment land between 2015 and 2035 and a number of ELR’s shows there continues to be very strong market demand for industrial space in Doncaster. There is therefore strong potential for Doncaster to accommodate high levels of inward investment in future which would also drive jobs growth. - H. Burtwistle & Son have concerns that the proposed housing requirement does not represent an appropriate figure once consideration is given to the potential for economic growth and job formation. H. Burtwistle & Son continue to consider that an appropriate balance should be sought between employment growth aspirations and the provision of homes. - The Framework (2019) reaffirms the Governments’ commitment to ‘significantly boosting the supply of homes’ and states that ‘it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed’. It goes on to state ‘to determine the minimum number of homes need, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify and alternative approach which also reflects current and future demographic trends and market signals’. - NPPG is clear that the standard method identifies a minimum annual housing need figure and that it does not produce a housing requirement figure Paragraph 002 Reference ID: 2a-002-20190220. It is also clear that the affordability adjustment within the standard methodology is just to ensure that the minimum housing needs starts to address affordability of homes. It therefore does not fully address affordability issues. Paragraph 006 Reference ID: 2a-006-20190220. 5.10. NPPG goes on to identify the circumstances when it is appropriate to plan for a higher housing need figure than the standard methodology identifies. The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides the minimum starting point in determining the number of homes needed in an area?it does not predict the impact of future government policies, changing economic circumstances or other factors that might have an impact on demographic behaviour. Therefore there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicate. 5.11. This will need to be assessed prior to and separate from, considering how much of the overall need can be accommodated. Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: 5.12. Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth 5.13. Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; 5.14. An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground. 5.15. There may, occasionally be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced SHMA) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need that the standard model suggests. 5.16. The Council need to recognise that the development of new housing will bring forward additional economic benefits to the area. The relationship between economic performance in an area and housing is complex, but having the right quantity, quality and balance
of housing in an area is necessary for economic growth. The development of new housing can therefore support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population which will create sustainable local jobs from the increased demand for goods and services. This provides an important sustainable development opportunity for Doncaster. 5.17. Importantly the HBF released in July 2018 its report on "the economic footprint of house building in England and Wales", which shows that house building in England and Wales is now worth £38bn a year and supports nearly 700,000 jobs. House building activity contributes economically in different ways including providing jobs, tax revenue and contributing funding for local infrastructure and communities. House building supports the economic in a wider sense through being drive for economic growth; delivering jobs and economic value; supporting labour market mobility; creating skills and employability; enhancing place competitiveness; creating quality of place and reusing brownfield land. 5.18. An important conclusion of the report and the wider economic benefits is that a healthy, well-functioning labour market requires a good supply of housing that is affordable for local people to enable them to move jobs freely and match up skills supply with employer demand. A dysfunctional housing market can inhibit labour market mobility, in turn stifling economic growth. 5.19. Regeneris consider that Doncaster's housing need over the plan period should be 1,100 dpa to support future economic growth. Regeneris consider that the target of 920 dpa would risk constraining the future economic growth of Doncaster. 5.20. Furthermore, it is evident that the council are seeking to align economic growth with housing growth and have identified provision above the local housing need figure to which the council considers accounts for Job Led growth. However, the jobs led growth figure is based on jobs growth forecast between 2015-2032. It is not clear whether consideration has been given to the additional job growth expected to the end of the plan period. Therefore H. Burtwistle & Son consider there is potential for the jobs led scenario to underestimate the jobs growth over the full plan period. The associated uplift to the housing requirement will therefore not be sufficient to meet the full needs over the plan period. 5.21. Additionally, the Council have identified a requirement for 481 hectares of employment land based on the Job Led scenario, and accounting for the extended plan period 2032-2035. The explanatory text considers that this requirement is met through 117 hectares of land developed between 2015-2018, 201 hectares of land benefitting from planning permission, and 164 hectares of allocated sites. However, there is a discrepancy between the totals in paragraph 4.61 of the Plan and the figures arising from Tables E1 to E8. The sites that benefit from planning permission in Tables E1 to E8 equate to 284.09 ha of employment land available within the Plan period. This leads to a total provision of 565.77 hectares of employment land against a requirement of 481 hectares. It should be noted that within the permissions identified in tables E1 to E8 that additional employment land is available, adding to the potential supply. There is therefore a significant mismatch between the level of planned employment provision in Policy 4 and the planned housing provision. Therefore, the housing requirement needs to be uplifted to reflect the identified level of land provision. 5.22. As stated above NPPG indicates that consideration can be given to delivery rates, for the last three years completions have been consistently higher than the proposed local plan target. Net completions amount to 3211 dwellings, with annual completions as follows: Year: 2015-16 Net Completions: 1,025 Year: 2016/17 Net Completions: 1,049 Year: 2017/18 Net Completions: 1,137 Year: Total Net Completions: 3,211 5.23. This demonstrates that there is sufficient demand to support a requirement above 920 dwellings per annum. 5.24. The Council's Economic Forecasts and Housing Needs Assessment (PBA, 2018) considers the housing requirement prior against both the standard methodology, standard methodology with an uplift for economic growth and previous approach for identifying housing need. Following the earlier approach, PBA consider that an aspirational job led figure, based on the SEP ambitions, would equate to a requirement of 1,073. PBA considered that it would be prudent to plan for between 562 and 1073. To ensure that the requirement was realistic. It is worthy of note that the Employment Land Needs Assessment (2019). Considers that the Job led scenario was ambitious but realistic and notes the significant growth in Doncaster within the previous 15 years in line with SCR growth aspirations. And the evidence of land take up and jobs growth for the period 2015-2018 was on target to meet 1% jobs growth per annum. This would support a target at the higher end of the range. 5.25. There is therefore evidence of both delivery at a higher rate and recently published evidence that indicates a higher need for housing. As stated above NPPG is clear that this evidence should be taken into account when determining the housing requirement. 5.26. When using the standard method the housing need figure was 585, applying a job led figure to match the SEP led to a requirement of 912 (PBA, 2018). However this is not based on the Jobs growth over the full plan period. 5.27. H. Burtwistle & Son consider further evidence is required to demonstrate whether the affordable housing needs of Doncaster can be met based on a target of 920. The explanatory text states that the current need for affordable housing, 209 affordable units, represents 23% of the Local Plan requirement for housing. Paragraph 6.9 states that this does not take into account current completions or viability. The completions affordable completions for the last three years (first three years of the Local Plan) are as follows: Year: 15/16 Affordable Completions: 151 Total Completions: 1,088 Affordable completions (%):13.88 Year: 16/17 Affordable Completions: 161 Total Completions: 1,067 Affordable completions (%): 15.09 Year: 17/18 Affordable Completions: 166 Total Completions: 1,208 Affordable completions (%): 13.74 5.28. The total affordable completions falling below the identified affordable need, even when total completions are higher than the proposed Local Plan requirement of 920. Further, Policy 8 identifies a requirement for 23% affordable housing in high/medium value areas and 15% in low value areas. An as indicated in response to Policy 8 and Policy 67, this is demonstrated to be unavailable for a number of sites, including all types of sites in low value areas. H. Burtwistle & Son are therefore concerned that a target of 920 dwellings will not deliver sufficient number and range of affordable homes to meet the identified need for affordable homes in the Borough. In order to deliver 209 affordable dwellings per year, a requirement of at least 1,393 would be required. This assumes the achievement of an average of 15% affordable housing, which represents the highest achieved over the last three years of monitoring. 5.29. H. Burtwistle & Son consider that there is sufficient evidence to point to the need for further uplift in the Local Plan housing requirement, based on the significant mismatch between housing and employment land allocations, the need to support the local plans economic ambitions, evidence of delivery and the need to ensure sufficient delivery of affordable housing. 5.30. H. Burtwistle & Son consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 5.31. However, H. Burtwistle & Son consider that with a higher requirement, of at least 1,100 to meet the economic growth aspirations, and further uplifts to balance housing allocations with the employment land allocations, and to ensure that the needs for affordable homes can be met (up to 1393) that the Local Plan can be found sound. H. Burtwistle & Son will continue to work with the Council to develop appropriate modifications to the Local Plan Housing Supply and Delivery. 5.32. H. Burtwistle & Son is concerned that the Council’s approach to delivering the housing requirement does not appear to reflect national guidance. 5.33. The Council is not demonstrating sufficient flexibility in the supply of housing land to ensure that the Plan can meet identified needs in full. The Framework is clear that plans should be sufficiently flexible to adapt to rapid change, and authorities need to ensure that a sufficient amount and variety of land can come forward where it is needed. 5.34. PPG is clear that careful attention should be given to providing an adequate supply of land, and the Plan needs to be realistic about what can be achieved and when. Authorities need to ensure that policies setting out contributions expected from development do not undermine the deliverability of the Plan. (Paragraph 59 Reference ID: 61-059-20190315). 5.35. At present based on the Councils figures presented in the Local Plan, a Plan requirement of 18400, completions equating to 3400 and allocations equating to 16055, there is a flexibility of around 1055 dwellings which equates to 5% of the Local Plan Requirement. H. Burtwistle & Son consider that this is insufficient given the potential for non-delivery and under delivery of sites, particularly from the dependency on a number of large sites. As set out in our response to a number of policies within the plan and specifically Policies 8, 46, 66 and 67, H. Burtwistle & Son are concerned that some
of the policies may undermine the deliverability of sites, or lead to the need for further site specific viability testing impacting on the timing of delivery and therefore there is a need for greater flexibility in the housing supply. Specific sites are identified later in this section. 5.36. H. Burtwistle & Son have a number of concerns relating to the supply in the Plan in terms of completions, the allocations from permissions and the new allocations. 5.37. It is noted that the supply attributed to completions appears to be resultant from gross completions rather than net completions. The Plan indicates that completions between 2015 and 2018 equate to 3400, However data in the Residential Land Availability Report indicates that net completions amount to 3211. Which would serve to increase the residual requirement based on an OAN of 920 to at least 15,189, and reduce the flexibility in the Plan to 866 dwellings (4.7%). 5.38. With regards to overall supply from permissions and allocations, a housing trajectory has been provided. H. Burtwistle & Son are concerned that this demonstrates that the Council will struggle to maintain a continuous supply of housing particularly in the later phases of the Plan period. Only four sites are identified as being capable of delivery in the final years of the plan period and two sites delivering beyond the plan period. 5.39. Furthermore, the Council’s HELAA and Residential Land Availability Report have a base date of March 2018, thus a whole monitoring year is presently absent. This evidence base should therefore be updated. 5.40. In terms of existing commitments it appears that the Council assumes 100% delivery and no discount has been applied. Best Practice and Guidance suggests that at least a 10% discount should be applied on sites with extant planning permission but this could vary depending on site specific constraints and complexity. H. Burtwistle & Son supports the discounting of sites with planning permission but consider it may be beneficial to include a higher level of discount for large sites to take into account unforeseen circumstances and delivery delays. H. Burtwistle & Son consider therefore that from a commitments pot of 9,488 dwellings a discount of at least circa 948 should be applied, however this could feasibly be higher given the history and constraints of a number of sites. 5.41. H. Burtwistle & Son is concerned with the reliance on some existing housing sites with planning permission and their potential delivery, particularly as some are fairly historic brownfield sites with viability concerns in market challenging areas. There are a considerable number of outstanding planning permissions in poor market areas, some of which are also constrained by flood risk. Evidence of developer interest in such sites should be a fundamental requirement to provide confidence on delivery. For example, a brief review of some sites being shown as commitments shows considerable concern: Site Ref: 838 Site Name: Hexthorpe No. of Dwellings: 930 H. Burtwistle & Son Comment: There have been a number of planning applications and proposed schemes over the years, but there has been no delivery on site. Countryside PLC has submitted a planning application which the Environment Agency has objected to and recommended refusal. There is conflicting evidence in terms of delivery rates, with the Local Plan and the HELAA. There are significant flooding constraints affecting the site. No further deliverability evidence has been produced in the Doncaster 5 Year Deliverable Housing Land Supply Statement. The Residential Land Availability Study notes that at 31/03/2018 there were no completions and the site is not currently being developed Site Ref: 843 Site Name: Manor Farm, Bessacarr No. of Dwellings: 1,009 H. Burtwistle & Son Comment: This is a Persimmon / Charles Church scheme. However, delivery has become frustrated by the need to deliver infrastructure to complete development. Since there is only one developer on the site the development trajectory is likely to be modest and development of the site is unlikely to be achieved during the plan period. The Residential Land Availability Report indicates 39 completed in 17/18 which is below the rates expected in the Local Plan and HELAA. Which assumes delivery rates of around 70 dwellings per annum. This is not realistic based on current delivery. Site Ref: 418 Site Name: Unity/DN7 Initiative No. of Dwellings: 905 H. Burtwistle & Son Comment: The site has outline planning permission for 3,100 homes and no reserved matters have been submitted. The site is in significant multipleownership and understand that CPO procedures will be employed to facilitate the delivery of requisite infrastructure. Homes England is also assigning public funding to support the development. Given the presence of multiple landowners, the need for considerable public funding, the likelihood of a protracted timeframe to open up the site for development and the absence of confirmed market interest, the site is unlikely to deliver the Council’s prediction of 1015 homes in the plan period. The HELAA does not anticipate a start on site until years 6 to 10. However the local plan indicates a 175 completions in the first five years. Higher rates of delivery are expected in the following years (70 dwellings per annum). These rates are overly optimistic especially when compared to annual completions for individual sites recorded in the residential land availability report. Site Ref: 569 Site Name: Askern Saw Mills No. of Dwellings: 220 H. Burtwistle & Son Comment: This is a long standing, unimplemented planning permission that has been available but has remained undeveloped. There is no developer interest and consequently the assumed delivery of 220 new homes is optimistic. Indicated in the Residential Land Availability Report that the outline permission has lapsed. Site Ref: 984 Site Name: Former McCormick Tractors No. of Dwellings: 600 H. Burtwistle & Son Comment: This site has significant constraints. There is an outline permission relating to the development of the site. The Local Plan assumes a delivery rate of 56 dwellings per in the first five years and 64 dwellings per annum in the following years. This is overly optimistic and not consistent with the planning status and constraints on site. Site Ref: 940 E1 and E2 Site Name: Manor Farm, Bessacarr No. of Dwellings: 280/920 H. Burtwistle & Son Comment: Site 940 is allocated in the plan for development of up to 280 dwellings (Part E1), Part E2 is identified as a reserved housing site for up to 920 dwellings. This site does not form a true reserve site. The council have identified a release mechanism which restricts the release of housing to net additional jobs delivered at the airport. 5.42. H. Burtwistle & Son understands that no allowance has been made for demolitions. No evidence is apparent and H. Burtwistle & Son consider it would be appropriate for this evidence to be forthcoming. 5.43. The availability of land is crucial. To be considered deliverable the land needs to be available now and in terms of developable there needs to be a reasonable prospect that land will be available at the point envisaged. H. Burtwistle & Son consider that sites which are not available or are unknown should not be included in the Plan or a buffer should be provided due to the uncertainty on delivery. Site Ref: 1028 Site Name: Tickhill No. of Dwellings: 74 H. Burtwistle & Son Comment: This site does not have access, therefore cannot be considered to be deliverable. Further, the capacity of the site is unrealistic. This is a 1.5 hectare site, a capacity of 44 dwellings would reflect the assumptions on net to gross developable area and density set out in the Viability Study. Site Ref: 662/247 Site Name: Collery Site, Rossington No. of Dwellings: 897/237 H. Burtwistle & Son Comment: The delivery rates on the site are overly optimistic. In 2017/18 there were only 49 completions on site. Assumptions of delivery rates based on past performance at this site then it is not considered that on 307 dwellings will be deliverable remaining forward within the plan period. This is significantly less than the 1127 homes forecast within the Plan. Site Ref: 808/343 Site Name: Thorne No. of Dwellings: 207 H. Burtwistle & Son Comment: This is a longstanding allocation and there is little evidence available through the councils evidence base to demonstrate that there is developer interest or that the site will come forward in the short term. Site Ref: 795 Site Name: Thorne No. of Dwellings: 13 H. Burtwistle & Son Comment: This site had permission which has since lapsed. There appears to be little developer interest in this site. The site is not considered to be deliverable. Site Ref: 510 Site Name: Thorne No. of Dwellings: 25 H. Burtwistle & Son Comment: This is a narrow and constrained infill site, with railway forming the southern boundary of the site. There is little evidence available through the Councils evidence base to indicate any developer interest in the site. Site Ref: 165/186 Site Name: Carcroft No. of Dwellings: 300 H. Burtwistle & Son Comment: This site is located to the western edge of the settlement and is relatively distant from the key services and facilities such as the train station, and employment opportunities. Other sites are located nearer to key services. 5.44. A high level assessment of some of the proposed allocations shows that some proposals are at risk and hence one of the reasons why Best Practice suggests a buffer to the housing requirement should be included in the Plan. Furthermore, would appear to have leant heavily on allocating sites that already have planning permission as an alternative to identifying a sufficient supply of new allocation sites to meet its requirement for the plan period. Consequently, a number of settlements with strong sustainability credentials would appear to have insufficient allocations to meet their needs through the life of the plan. 5.45. It would appear in some instances that there are unrealistic assumptions on gross to net developable site areas and on the
The Council therefore need a wider choice of sites across a number of different areas and market areas to gain traction and increase build rates. To achieve the housing requirement the Council need at least 30-35 housing outlets operating across the Borough for every year of the Plan and H. Burtwistle & Son do not believe the Plan can deliver this, particularly in the middle to later years. 5.47. H. Burtwistle & Son consider the Council should be more realistic on the potential delivery on sites, particularly on sites which have not commenced preparations of securing the relevant planning permission and developer interest and on build rates. H. Burtwistle & Son consider that the sites with no planning permission should not be providing completions until 2023/24 (which is two years post adoption) as there is significant work and preparations to commence on site, including time to prepare and submit the planning application, gain planning permission, discharge conditions, legal agreements, site preparations, and commence house building. This process can take around 2 years. 5.48. H. Burtwistle & Son would be happy to work through the specific sites in detail with the Council to seek to reach agreement on the HELAA and current housing commitments. Interestingly, in line with the general direction of travel for this Local Plan the new Framework (2019) defines the term Deliverable in the glossary stating that sites can only be considered deliverable where they have detailed planning permission. If they have outline planning permission or are allocated in a plan a site can only be considered if there is clear evidence that housing completions will begin on site within five years. The level of evidence that must be provided to demonstrate that sites are deliverable has therefore been tightened. 5.49. H. Burtwistle & Son considers that the main risks to the delivery of the housing requirement are slippages in the delivery of allocations, longer lead-in times, reduced housing capacity on sites, sites no longer coming forward as result of viability from policy obligations set out in the Local Plan. Given these risks H. Burtwistle & Son would suggest a greater flexibility is incorporated into the Local Plan especially in light of H. Burtwistle & Son’s conclusions on the actual housing requirement. 5.50. H. Burtwistle & Son would encourage the Council to review the existing commitments to ensure this is still deliverable, whether there is a housebuilder on board and whether there are any constraints preventing development from coming forward. H. Burtwistle & Son would also ask the Council to look at the proposed delivery of site allocations to determine whether the delivery rates are appropriate and the sites are deliverable in light of the policy obligations proposed in the Local Plan. 5.51. Taking into account the above, the Council should be making provision for: Annual Housing Requirement Council Figures: 920 H. Burtwistle & Son’s View: 1,100 Total Requirement (2015-2035) - which is 15 years post Adoption Council Figures: 18,400 H. Burtwistle & Son’s View: 22,000 Completions Council Figures: 3,400 H. Burtwistle & Son’s View: 3,211 Total Commitments Council Figures: 9,488 H. Burtwistle & Son’s View: 83.77 Total Non-Delivery (at least 10%) Council Figures: 948.8 H. Burtwistle & Son’s View: 948.8 Total Allocations Council Figures: 6,567 H. Burtwistle & Son’s View: 6,567 Total Supply Council Figures: 18,506 H. Burtwistle & Son’s View: 18,317.2 Residual homes to be identified Council Figures: -106.2 H. Burtwistle & Son’s View: 3,682.2 5.52. Therefore, on a best case scenario H. Burtwistle & Son consider as a minimum there needs to be circa 3,682 new homes to be identified in the Plan to account for net completions, and economic growth. 5.53. This does not account for the uplift required to ensure affordable housing need is met in full, which as indicated in paragraph 5.28, would lead to a requirement of 1,393 dpa and a plan requirement of 27,860. Based on the current supply of 3,211 completions, 9,488 commitments, an allowance for 10% non-implementation, and the currently proposed allocations of 6,567 homes, this would lead to need for a further 9,542 additional homes. 5.54. Significantly, the scenarios above do not balance housing provision with the additional employment allocations. The additional employment allocations amount to 83.7 hectares above the requirement, this is the equivalent of an additional 3.5 years supply of land. As a result in order to balance the housing provision with the additional employment supply circa 3,850 additional homes would be required, this amounts to an annual requirement of 1,292.5 dpa. H. Burtwistle & Son consider circa 7,532 additional homes are required in order to balance the Housing with Employment requirement 2015-2035 H. Burtwistle & Son’s View: 481 hectares Annual requirement employment H. Burtwistle & Son’s View: 24 hectares Employment land developed 2015-2018 H. Burtwistle & Son’s View: 117 Sites with planning permission Tables E1 to E8 H. Burtwistle & Son’s View: 284.09 New employment allocations Policy 4 H. Burtwistle & Son’s View: 164.68 Total Allocations H. Burtwistle & Son’s View: 565.77 Amount of land allocated over the requirement H. Burtwistle & Son’s View: 83.77 Additional homes required to balance with employment land supply H. Burtwistle & Son’s View: 3,850 Residual homes to be identified H. Burtwistle & Son’s View: 7,532.2 5.55. These figures assume no changes to the currently identified housing sites, which, in response to policy 3 and policy 6, H. Burtwistle & Son have raised significant concerns, particularly with regards the deliverability, capacity, and delivery rates of some sites and the overreliance on existing permissions or longstanding allocations. This does not account for additional economic growth associated with the airport. 5.56. Furthermore, there does not appear to be any safeguarded sites or genuinely deliverable reserve sites identified in the Draft Plan. This is concerning given Policy 6 states that the Plan will designated Reserve Development Sites. However, it states that the reserves sites identified are not considered developable in the plan period. Paragraph 4.43 of the Plan indicates that the reserve sites have flood risk mitigation issues or safeguarding issues associated with HS2 preventing them from coming forward. H. Burtwistle & Son would suggest, in order to assist with flexibility, that safeguarded sites be proposed in accordance with national guidance. The only other reserve site is related to direct job growth at the Airport and is strictly controlled, thus does not provide flexibility for the Plan as a whole. 5.57. The above scenarios do not include a detailed analysis of existing commitments and proposed allocations, however from a high level analysis it is evident that the Council’s trajectory and analysis of sites is optimistic. 5.58. Therefore, with an increased housing requirement, reduced potential from existing planning permissions sites and incorporation of a flexibility allowance, further land will need to be identified. 5.59. H. Burtwistle & Son consider that the appropriate areas and sites to accommodate growth would be: - Site 244/331: Coulman Road, Thorne 5.60. A brief summary is provided for these sites in response to Policy 6. An advocacy has been submitted alongside earlier representations. This report demonstrates that the sites are available, suitable and achievable and therefore deliverable in accordance with the Framework and PPG. 5.61. H. Burtwistle & Son consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 5.62. However, H. Burtwistle & Son consider that with an appropriate uplift to the housing requirement, consideration of net completions, non-implementation rates and the allocation of additional land and safeguarded sites that the Local Plan can be found sound. H. Burtwistle & Son will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 5.63. To overcome the objection and address soundness matters, the Council should: - Increase housing requirement to 1,100 to 1,300 dwellings over the plan period. - Reduce the potential from current commitments and include a non-delivery allowance. - Identify safeguarded land. - Allocate Site 244/331: Coulman Road, Thorne.
Summary:

Policy 3 - Level and Distribution of Growth. 1. Housing requirement not sufficient and not aligned with forecast economic growth. 2. Plan identifies more employment land than target. 3. Mismatch between employment land allocated and level of housing allocated. 4. Housing requirement - have commissioned own report by 'Regeneris Consulting' for OAN and economic forecasts (enclosed as Appendix) 5. Housing requirement should be 1,100 dpa (Regeneris) 6. Peter Brett forecast is for 2015-2032 - not clear if provision is made for 2032 to 2035. 7. There is a discrepancy in employment land allocated. Provision is 565.77 Ha against 481 requirement (para 5.21). 8. Employment allocation is 83.77 above requirement therefore need more housing. 9. Estimate circa 7,532 additional homes are required to balance emp/hsg requirement. 10. Recent high housing delivery rates and evidence from Employment land Needs Assessment (2019 update) suggest a higher housing need requirement (based on the success of the 2015-18 period) 11. Concerned that affordable housing rates are not viable. 12. 920 will not deliver sufficient affordable housing. 13. Requirement would need to be 1,393 dpa to meet 15% requirement (based on last 3 years of monitoring). 14. Housing requirement should be at least 1,100. 15. Current completions (2015-18) are gross and not net. 16. Plan will struggle with supply late in the plan period. 17. Evidence base needs updating - no HELAA or RLA for 2019. 18. Existing commitments - assumes 100% delivery - a discount should be applied for some none delivery. 19. Concerned about viability/deliverability of several sites with PP. (list the sites) 20. Some of the allocations are a deliverability risk (includes list and comments on sites) 21. Need to be more realistic on delivery rates. 22. Should review existing commitments to ensure deliverability. 23. Propose site 244 & 331 Coulman Road for allocation. Proposed Changes: 1. Increase housing requirement to 1,100-1,300 dpa. 2. Reduce the potential from current commitments. 3. Include a none delivery allowance. 4. Identify safeguarded land 5. Allocate sites 244 & 331.

Response:

A number of ways and means have been submitted to calculate housing and jobs figures for the Local Plan. The Peter Brett's Report explains the approach taken and ties jobs to housing growth, which includes a significant uplift from the Standard Methodology Figure. The Housing Topic Paper explains how figures have been calculated and where deductions have been made for permissions etc., and also covers the delivery trajectory. The Site Selection Methodology explains how site delivery has been calculated and justifies the proposed build out rates. Other evidence base has been updated for submission. Where adaptations have been made to account for the extension to the plan period since this report was finalised, they have been made to both housing and employment respectively. The difference in the employment figures quoted are the result of tables showing different information. It is accepted that this is confusing and this has been amended to be more clear. The correct employment figure is 481ha and enough employment land has been found to deliver this, and enough housing too meet this arising need too. The standard methodology already makes allowances for affordability ratios and the Local Plan has already almost doubled this figure with the 920dpa requirement so will be delivering more affordable housing which will increase supply/competition and help to bring down affordability even further. Doncaster Council has ambitious plans to deliver more affordable homes, including more council housing, as part of a wider delivery programme. During 2019/20, the first developments will include a range of general needs and more bespoke accommodation. Sites will be funded through a combination of Housing Capital Programme funds; the use of One-for-One capital receipts from Right to Buy sales; and grant funding allocated from the Homes England Shared Ownership and Affordable Housing Programme (SOAHP) 2016/21 should the future bid be successful. Other initiatives and strategies, such as the Council's Inclusive Growth Plan, are seeking to address issues such as skills and productivity/increasing wages etc. which will also assist people in being able to afford/access housing.
S. H. Burtwistle & Son is concerned that the Doncaster Local Plan Draft Policies and Proposed Sites is deficient in its content and evidence base and does not reflect national guidance. Test of Soundness 5.2. H. Burtwistle & Son considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 5.3. H. Burtwistle & Son have a number of concerns in relation to the Level and Distribution of Growth. The concerns relate to the following: - The Local Plan housing requirement is not sufficient and is not fully aligned with forecast economic growth. - The Local Plan identifies significantly more employment land than the target for provision established in Policy 3. - There is a significant mismatch between the level of employment land allocated and the level of housing land allocated in the Plan period; and - The identified supply is not sufficient to meet the Councils identified requirement. Need 5.4. H. Burtwistle & Son is concerned with the proposed level of new housing being planned for in the Local Plan. Policy 3 makes provision for 18,400 dwellings to be delivered between 2015 and 2035, equivalent to 920 net new homes each year. Policy 3 states that there should be sufficient allocations for 15 years supply, which is 13,230 new homes. 5.5. H. Burtwistle & Son has commissioned Regeneris Consulting to review the OAN and the Economic Forecasts and Housing Needs Assessment (2018). The Regeneris report is attached to these representations. Regeneris conclude that: - The target delivers the minimum level of housing need for Doncaster based on the standard method (585 dpa) and makes an upward adjustment to support economic growth. - The upward adjustment was based on evidence produced by PBA which recommended housing need is presented as a range between 585 dpa (the minimum) and 912 dpa. The upper limit was based on matching Jobs growth aspirations of the Sheffield City Region LEP (1,420) over the period 2016 to 2026. - However, PBA have made unjustified and unrealistic assumptions for a number of factors which all suppress the level of housing required to support future employment growth. In particular, we disagree with their assumptions about commuting, double jobbing and household formation rates. 5.6. Regeneris consider that: - Doncaster has been one of the fastest growing economies in Yorkshire and Humber. The district has created around 24,000 jobs between 2000 and 2017, representing a growth rate of 1.1% p.a. - Doncaster's key asset is its connectivity by road, rail and air which has made it a highly attractive location for inward investment, particularly for industrial and logistics occupiers, with over 1.1m sq m of industrial/workspace space taken up since 2010. - The strong performance is also due to a significant improvement in key economic indicators, including skills and levels of enterprise. The business start-up rate has more than doubled since 2010 and is now in line with the national average. These improvements have removed a key barrier to growth and mean that Doncaster is well placed to continue its high rate of growth. - The Local Plan has set a target of delivering 481 hectares of employment land between 2015 and 2035 and a number of ELR’s shows there continues to be very strong market demand for industrial space in Doncaster. There is therefore strong potential for Doncaster to accommodate high levels of inward investment in future which would also drive jobs growth. 5.7. H. Burtwistle & Son have concerns that the proposed housing requirement does not represent an appropriate figure once consideration is given to the potential for economic growth and job formation. H. Burtwistle & Son continue to consider that an appropriate balance should be sought between employment growth aspirations and the provision of homes. 5.8. The Framework (2019) reaffirms the Governments’ commitment to ‘significantly boosting the supply of homes’ and states that ‘it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed’. It goes on to state ‘ to determine the minimum number of homes need, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify and alternative approach which also reflects current and future demographic trends and market signals’. 5.9. NPPG is clear that the standard method identifies a minimum annual housing need figure and that it does not produce a housing requirement figure Paragraph 002 Reference ID: 2a-002- 20190220. 5.10. NPPG goes on to identify the circumstances when it is appropriate to plan for a higher housing need figure than the standard methodology identifies. ‘The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides the minimum starting point in determining the number of homes needed in an area?it does not predict the impact of future government policies, changing economic circumstances or other factors that might have an impact on demographic behaviour. Therefore there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicate. 5.11. This will need to be assessed prior to and separate from, considering how much of the overall need can be accommodated. Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: 5.12. Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth 5.13. Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; 5.14. An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground. 5.15. There may, occasionally be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced SHMA) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need that the standard model suggests. Paragraph 010 Reference ID: 2a-010-20190220. 5.16. The Council need to recognise that the development of new housing will bring forward additional economic benefits to the area. The relationship between economic performance in an area and housing is complex, but having the right quantity, quality and balance
of housing in an area is necessary for economic growth. The development of new housing can therefore support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population which will create local sustainable jobs from the increased demand for goods and services. This provides an important sustainable development opportunity for Doncaster. 5.17. Importantly the HBF released in July 2018 its report on "the economic footprint of house building in England and Wales", which shows that house building in England and Wales is now worth £38bn a year and supports nearly 700,000 jobs. House building activity contributes economically in different ways including providing jobs, tax revenue, and contributing funding for local infrastructure and communities. House building supports the economic in a wider sense through being drive for economic growth; delivering jobs and economic value; supporting labour market mobility; creating skills and employability; enhancing place competitiveness; creating quality of place and reusing brownfield land. 5.18. An important conclusion of the report and the wider economic benefits is that a healthy, wellfunctioning labour market requires a good supply of housing that is affordable for local people to enable them to move jobs freely and match up skills supply with employer demand. A dysfunctional housing market can inhibit labour market mobility, in turn stifling economic growth. 5.19. Regeneris consider that Doncaster’s housing need over the plan period should be 1,100 dpa to support future economic growth. Regeneris consider that the target of 920 dpa would risk constraining the future economic growth of Doncaster. 5.20. Furthermore, it is evident that the council are seeking to align economic growth with housing growth and have identified provision above the local housing need figure to which the council considers accounts for Job Led growth. However, the jobs led growth figure is based on jobs growth forecast between 2015-2032. It is not clear whether consideration has been given to the additional job growth expected to the end of the plan period. Therefore H. Burtwistle & Son consider there is potential for the jobs led scenario to underestimate the jobs growth over the full plan period. The associated uplift to the housing requirement will therefore not be sufficient to meet the full needs over the plan period. 5.21. Additionally, the council have identified a requirement for 481 hectares of employment land based on the Job Led scenario, and accounting for the extended plan period 2032-2035. The explanatory text considers that this requirement is met through 117 hectares of land developed between 2015-2018, 201 hectares of land benefitting from planning permission, and 164 hectares of allocated sites. However, there is a discrepancy between the totals in paragraph 4.61 of the Plan and the figures arising from Tables E1 to E8. The sites that benefit from planning permission in tables E1 to E8 equate to 284.09 ha of employment land available within the Plan period. This leads to a total provision of 565.77 hectares of employment land against a requirement of 481 hectares. It should be noted that within the permissioṁs identified in tables E1 to E8 that additional employment land is available, adding to the potential supply. There is therefore a significant mismatch between the level of planned employment provision in Policy 4 and the planned housing provision. Therefore, the housing requirement needs to be uplifted to reflect the identified level of employment land provision. 5.22. As stated above NPPG indicates that consideration can be given to delivery rates, for the last three years completions have been consistently higher than the proposed local plan target. Net completions amount to 3211 dwellings, with annual completions as follows: Year: 2015-16 Net Completions: 1,025 Year: 2016/17 Net Completions: 1,049 Year: 2017/18 Net Completions: 1,137 Year: Total Net Completions: 3,211 5.23. This demonstrates that there is sufficient demand to support a requirement above 920 dwellings per annum. 5.24. The Councils Economic Forecasts and Housing Needs Assessment (PBA, 2018) considers the housing requirement prior against both the standard methodology, standard methodology with an uplift for economic growth and previous approach for identifying housing need. Following the earlier approach, PBA consider that an aspirational job led figure, based on the SEP ambitions, would equate to a requirement of 1,073. PBA considered that it would be prudent to plan for between 562 and 1073. To ensure that the requirement was realistic. It is worthy of note that the Employment Land Needs Assessment (2019). Considers that the Job led scenario was ambitious but realistic and notes the significant growth in Doncaster within the previous 15 years in line with SCR growth aspirations. And further the evidence of land take up and jobs growth for the period 2015-2018 was on target to meet 1% jobs growth per annum. This would support a target at the higher end of the range. 5.25. There is therefore evidence of both delivery at a higher rate and recently published evidence that indicates a higher need for housing. As stated above NPPG is clear that this evidence should be taken into account when determining the housing requirement. 5.26. When using the standard method the housing need figure was 585, applying a job led figure to match the SE jobs led scenario was 912 (PBA, 2018). However this is not based on the Jobs growth over the full plan period. 5.27. H. Burtwistle & Son consider further evidence is required to demonstrate whether the affordable housing needs of Doncaster can be met based on a target of 920. The explanatory text states that the current need for affordable housing, 209 affordable units, represents 23% of the Local Plan requirement for housing. Paragraph 6.9 states that this does not take into account current completions or viability. The completions affordable completions for the last three years (first three years of the Local Plan) are as follows: Year: 15/16 Affordable Completions: 151 Total Completions: 1,088 Affordable completions (%):13.88 Year: 16/17 Affordable Completions: 161 Total Completions: 1,067 Affordable completions (%):15.09 Year: 17/18 Affordable Completions: 166 Total Completions: 1,208 Affordable completions (%):13.74 5.28. The total affordable completions falling below the identified affordable need, even when total completions are higher than the proposed Local Plan requirement of 920. Further, Policy 8 identifies a requirement for 23% affordable housing in high/medium value areas and 15% in low value areas. An as indicated in response to Policy 8 and Policy 67, this is demonstrated to be unavailable for a number of sites, including all types of sites in low value areas. H. Burtwistle & Son are therefore concerned that a target of 920 dwellings will not deliver sufficient number and range of affordable homes to meet the identified need for affordable homes in the Borough. In order to deliver 209 affordable dwellings per year, a requirement of at least 1,393 would be required. This assuming the achievement of an average of 15% affordable housing, which represents the highest achieved over the last three years of monitoring. 5.29. H. Burtwistle & Son consider that there is sufficient evidence to pointing to the need for further uplift in the Local Plan housing requirement, based on the significant mismatch between housing and employment land allocations, the need to support the local plans economic ambitions, evidence of delivery and the need to ensure sufficient delivery of affordable housing. 5.30. H. Burtwistle & Son consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable policy development in accordance with the Framework in the future. In these circumstances, when not consistent with the Doncaster Local Plan in its current form to be sound. 5.31. However, H. Burtwistle & Son consider that with a higher requirement, of at least 1,100 to meet the economic growth aspirations, and further uplifts to balance housing allocations with the employment land allocations, and to ensure that the needs for affordable homes can be met (up to 1,393) that the Local Plan can be found sound. H. Burtwistle & Son will continue to work with the Council to develop appropriate modifications to the Local Plan Housing Supply and Delivery. 5.32. H. Burtwistle & Son is concerned that the Council’s approach to delivering the housing requirement does not appear to reflect national guidance. 5.33. The Council is not demonstrating sufficient flexibility in the supply of housing land to ensure that the Plan can meet identified needs in full. The Framework is clear that plans should be sufficiently flexible to adapt to rapid change, and emphasises the importance of ensuring that a sufficient amount and variety of land can come forward where it is needed. 5.34. PPG is clear that careful attention should be given to providing an adequate supply of land, and the Plan needs to be realistic about what can be achieved and when. Authorities need to ensure that policies setting out contributions expected from development do not undermine the deliverability of the Plan. (Paragraph 59 Reference ID: 61-059-20190315. 5.35. At present based on the Councils figures presented in the Local Plan, a Plan requirement of 18400, completions equating to 3400 and allocations equating to 16,055, there is a flexibility of around 1055 dwellings which equates to 5% of the Local Plan Requirement. H. Burtwistle & Son consider that this is insufficient given the potential for non-delivery and under delivery of sites, particularly from the dependency on a number of large sites. As set out in our response to a number of policies within the plan and specifically Policies 8, 46, 66 and 67, H. Burtwistle & Son are concerned that some
of the policies may undermine the deliverability of sites, or lead to the need for further site specific viability testing impacting on the timing of delivery and therefore there is a need for greater flexibility in the housing supply. Specific sites are identified later in this section. 5.36. H. Burtwistle & Son have a number of concerns relating to the supply in the Plan in terms of completions, the allocations from permissions and the new allocations. 5.37. It is noted that the supply attributed to completions appears to be resultant from gross completions rather than net completions. The Plan indicates that completions between 2015 and 2018 equate to 3400, However data in the Residential Land Availability Report indicates that net completions amount to 3211. This would result in a 1.3% discount to the 3400 which would reduce the deliveries required in the Plan and therefore impact on net to gross developable area and density set out in the Viability Study. 5.38. With regards to overall supply from permissions and allocations, a housing trajectory has been provided. H. Burtwistle & Son are concerned that this demonstrates that the Council will struggle to maintain a continuous supply of housing particularly in the later phases of the Plan period. Only four sites are identified as being capable of delivery in the final years of the plan period and two sites delivering beyond the plan period. 5.39. Furthermore, the Council’s HLAA and Residential Land Availability Report have a base date of March 2018, thus a whole monitoring year is presently absent. This evidence base should therefore be updated. 5.40. In terms of existing commitments it appears that the Council assumes 100% delivery and no discount has been applied. Best Practice and Guidance suggests that at least a 10% discount should be applied on sites with extant planning permission but this could vary depending on site specific constraints and complexity. H. Burtwistle & Son supports the discounting of sites with planning permission but consider it may be beneficial to include a higher level of discount for large sites to take into account unforeseen circumstances and delivery delays. H. Burtwistle & Son consider therefore that from a commitments pot of 9,488 dwellings a discount of at least circa 948 should be applied, however this could feasibly be higher given the history and constraints of a number of sites. 5.41. H. Burtwistle & Son is concerned with the reliance on some existing housing sites with planning permission and their potential delivery, particularly as some are fairly historic brownfield sites with viability concerns in market challenging areas. There are a considerable number of outstanding planning permissions in poor market areas, some of which are also constrained by flood risk. Evidence of developer interest in such sites should be a fundamental requirement to provide confidence on delivery. For example, a brief review of some sites being shown as commitments shows considerable concern: Site Ref: 838 Site Name: Hexthorpe No. of Dwellings: 930 H. Burtwistle & Son Comment: There have been a number of planning applications and proposed schemes over the years, but there has been no delivery on site. Countryside PLC has submitted a planning application which the Environment Agency has objected to and recommended refusal. There is conflicting evidence in terms of delivery rates, with the Local Plan and the HLAA. There are significant flooding constraints affecting the site. No further deliverability evidence has been produced in the Doncaster 5 Year Deliverable Housing Land Supply Statement. The Residential Land Availability Study notes that at 31/03/2018 there were no completions and the site is not currently being developed Site Ref: 843 Site Name: Manor Farm, Bessacarr No. of Dwellings: 1,009 H. Burtwistle & Son Comment: This is a Persimmon / Charles Church scheme. However, delivery has become frustrated by the need to deliver infrastructure to complete development. Since there is only one developer on the site the development trajectory is likely to be modest and development of the site is unlikely to be achieved during the plan period. The Residential Land Availability Report indicates 39 completed in 17/18 which is below the rates expected in the Local Plan and HLAA. Which assumes delivery rates of around 70 dwellings a year. This is not realistic based on current delivery. Site Ref: 418 Site Name: Unity/DN7 Initiative No. of Dwellings: 905 H. Burtwistle & Son Comment: The site has outline planning permission for 2,100 homes and no reserved matters have been submitted. The site is in significant multipleownership and understand that CPO procedures will be employed to facilitate the delivery of requisite infrastructure. Homes England is also assigning public funding to support the development. Given the presence of multiple landowners, the need for considerable public funding, the likelihood of a protracted timeframe to open up the site for development and the absence of confirmed market interest, the site is unlikely to deliver the Council’s prediction of 1015 homes in the plan period. The HLAA does not anticipate a start on site until years 6 to 10. However the local plan indicates a 175 completions in the first five years. Higher rates of delivery are expected in the following years (70 dwellings per annum). These rates are overly optimistic especially when compared to annual completions for individual sites recorded in the residential land availability report. Site Ref: 569 Site Name: Askern Saw Mills No. of Dwellings: 220 H. Burtwistle & Son Comment: This is a long standing, unimplemented planning permission that has been available but has remained undeveloped. There is no developer interest and consequently the assumed delivery of 220 new homes is optimistic. Indicated in the Residential Land Availability Report that the outline permission has lapsed. Site Ref: 984 Site Name: Former McCormick Tract No. of Dwellings: 600 H. Burtwistle & Son Comment: This site has significant constraints. There is an outline permission relating to the development of the site. The Local Plan assumes a delivery rate of 56 dwellings per in the first five years and 64 dwellings per annum in the following years. This is overly optimistic and not consistent with the planning status and constraints on site. Site Ref: 940 E1 and E2 Site Name: Land east of Poplars Farm No. of Dwellings: 280/920 H. Burtwistle & Son Comment: Site 940 is allocated in the plan for development up to 280 dwellings (Part E1), Part E2 is identified as a reserved housing site for up to 920 dwellings. This site does not form a true reserve site. The council have identified a release mechanism which restricts the release of housing to net additional jobs delivered at the airport. 5.42. H. Burtwistle & Son understands that no allowance has been made for demolitions. No evidence is apparent and H. Burtwistle & Son consider it would be appropriate for this evidence to be forthcoming. 5.43. The availability of land is crucial. To be considered deliverable the land needs to be available now and in terms of developable there needs to be a reasonable prospect that land will be available at the point envisaged. H. Burtwistle & Son consider that sites which are not deliverable or are unknown should not be included in the Plan or a buffer should be provided due to the uncertainty on delivery. Site Ref: 1028 Site Name: Tickhill No. of Dwellings: 74 H. Burtwistle & Son Comment: This site does not have access, therefore cannot be considered to be deliverable. Further, the capacity of the site is unrealistic. This is a 1.5 hectare site, a capacity of 44 dwellings would reflect the assumptions on net to gross developable area and density set out in the Viability Study. Site Ref: 662/247 Site Name: Colliery Site, Rossington No. of Dwellings: 897/237 H. Burtwistle & Son Comment: The delivery rates on the site are overly optimistic. In 2017/18 there were only 49 completions on site. Assuming delivery rates based on past performance at this site then it is considered that only 600 dwellings will be capable of remaining forward within the plan period. This is significantly less than the 1127 homes forecast within the Plan. Site Ref: 801/343 Site Name: Thorne No. of Dwellings: 207 H. Burtwistle & Son Comment: This is a longstanding allocation and there is little evidence available through the councils evidence base to demonstrate that there is developer interest or that the site will come forward in the short term. Site Ref: 795 Site Name: Thorne No. of Dwellings: 13 H. Burtwistle & Son Comment: This site had permission which has since lapsed. There appears to be little developer interest in this site. The site is not considered to be deliverable. Site Ref: 510 Site Name: Thorne No. of Dwellings: 25 H. Burtwistle & Son Comment: This is a narrow and constrained infill site, with railway forming the southern boundary of the site. There is little evidence available through the Councils evidence base to indicate any developer interest in the site. Site Ref: 165/186 Site Name: Carcroft No. of Dwellings: 300 H. Burtwistle & Son Comment: This site is located to the western edge of the settlement and is relatively distant from the key services and facilities such as the train station, and employment opportunities. Other sites are located nearer to key services. 5.44. A high level assessment of some of the proposed allocations shows that some proposals are at risk and hence one of the reasons why Best Practice suggests a buffer to the housing requirement should be included in the Plan. Furthermore, would appear to have scantily on allocating sites that already have planning permission as an alternative to identifying a sufficient supply of new allocation sites to meet its requirement for the plan period. Consequently, a number of settlements with strong sustainability credentials would appear to have insufficient allocations to meet their needs through the life of the plan. 5.45. It would appear in some instances that there are unrealistic assumptions on gross to net developable site areas and on the
resultant yields from proposed allocations, especially when considering some of the development requirements. H. Burtwistle & Son therefore suggest that further sites should be identified. 5.46. The Council therefore need a wider choice of sites across a number of different areas and market areas to gain traction and increase build rates. To achieve the housing requirement the Council need at least 30-35 housing outlets operating across the Borough for every year of the Plan and H. Burtwistle & Son do not believe the Plan can deliver this, particularly in the middle to later years. 5.47. H. Burtwistle & Son considers the Council should be more realistic on the potential delivery on sites, particularly on sites which have not commenced preparations of securing the relevant planning permission and developer interest and on build rates. H. Burtwistle & Son consider that the sites with no planning permission should not be providing completions until 2023/24 (which is two years post adoption) as there is significant work and preparations to commence on site, including time to prepare and submit the planning application, gain planning permission, discharge conditions, legal agreements, site preparations, and commence house building. This process can take around 2 years. 5.48. H. Burtwistle & Son would be happy to work through the specific sites in detail with the Council to seek to reach agreement on the HELAA and current housing commitments. Interestingly, in line with the general direction of travel for this Local Plan the new Framework (2019) defines the term Deliverable in the glossary stating that sites can only be considered deliverable where they have detailed planning permission. If they have outline planning permission or are allocated in a plan a site can only be considered if there is clear evidence that housing completions will begin on site within five years. The level of evidence that must be provided to demonstrate that sites are deliverable has therefore been tightened. 5.49. H. Burtwistle & Son considers that the main risks to the delivery of the housing requirement are slippages in the delivery of allocations, longer lead-in times, reduced housing capacity on sites, sites no longer coming forward as result of viability from policy obligations set out in the Local Plan. Given these risks H. Burtwistle & Son would suggest a greater flexibility is incorporated into the Local Plan especially in light of H. Burtwistle & Son’s conclusions on the actual housing requirement. 5.50. H. Burtwistle & Son would encourage the Council to review the existing commitments to ensure this is still deliverable, whether there is a housebuilder on board and whether there are any constraints preventing development from coming forward. H. Burtwistle & Son would also ask the Council to look at the proposed delivery of site allocations to determine whether the delivery rates are appropriate and the sites are deliverable in light of the policy obligations proposed in the Local Plan. 5.51. Taking into account the above, the Council should be making provision for: Annual Housing Requirement Council Figures: 920 H. Burtwistle & Son’s View: 1,100 Total Requirement (2015-2035) - which is 15 years post Adoption Council Figures: 18,400 H. Burtwistle & Son’s View: 22,000 Completions Council Figures: 3,400 H. Burtwistle & Son’s View: 3,211 Total Commitments Council Figures: 9,488 H. Burtwistle & Son’s View: 9,488 Non-Delivery Allowance (at least 10%) Council Figures: 948.8 H. Burtwistle & Son’s View: 948.8 Total Allocations Council Figures: 6,567 H. Burtwistle & Son’s View: 6,567 Total Supply Council Figures: 18,506 H. Burtwistle & Son’s View: 18,317 Residual homes to be identified Council Figures: -106.2 H. Burtwistle & Son’s View: 3,682.2 5.52. Therefore, on a best case scenario H. Burtwistle & Son consider as a minimum there needs to be circa 3,682 new homes to be identified in the Plan to account for net completions, and economic growth. 5.53. This does not account for the uplift required to ensure affordable housing need is met in full, which as indicated in paragraph 5.28, would lead to a requirement of 1,393 dpa and a plan requirement of 27,860. Based on the current supply of 3,211 completions, 9,488 commitments, an allowance for 10% non-implementation, and the currently proposed allocations of 6,567 homes, this would lead to demand for a further 9,542 additional homes. 5.54. Significant, the scenarios above do not balance housing provision with the additional employment allocations. The additional employment allocations amount to 83.77 hectares above the requirement, this is the equivalent of an additional 3.5 years supply of land. As a result in order to balance the housing provision with the additional employment supply circa 3,850 additional homes would be required, this amounts to an annual requirement of 1,292.5 dpa. H. Burtwistle & Son consider circa 7,532 additional homes are required in order to balance the Housing with Employment allocations, account for net completions and appropriate non-implementation rates. Employment requirement 2015-2035 H. Burtwistle & Son’s View: 481 hectares Annual requirement employment H. Burtwistle & Son’s View: 24 hectares Employment land developed 2015-2018 H. Burtwistle & Son’s View: 117 Sites with planning permission Tables E1 to E8 H. Burtwistle & Son’s View: 284.09 New employment allocations Policy 4 H. Burtwistle & Son’s View: 164.68 Total Allocations H. Burtwistle & Son’s View: 565.77 Amount of land allocated over the requirement H. Burtwistle & Son’s View: 83.77 Additional homes required to balance with employment land supply H. Burtwistle & Son’s View: 3,850 Residual homes to be identified H. Burtwistle & Son’s View: 7,532.2 5.55. These figures assume no changes to the currently identified housing sites, which, in response to policy 3 and policy 6, H. Burtwistle & Son have raised significant concerns, particularly with regards the deliverability, capacity, and delivery rates of some sites and the overreliance on existing permissions or longstanding allocations. This does not account for additional economic growth associated with the airport. 5.56. Furthermore, there does not appear to be any safeguarded sites or genuinely deliverable reserve sites identified within the Draft Plan. This is concerning given Policy 6 states that the Plan will designate Reserve Development Sites. However, it states that the reserves sites identified are not considered developable in the plan period. Paragraph 4.43 of the Plan indicates that the reserve sites have flood risk mitigation issues or safeguarding issues associated with HS2 preventing them from coming forward. H. Burtwistle & Son would suggest, in order to assist with flexibility, that safeguarded sites be proposed in accordance with national guidance. The only other reserve site is related to direct job growth at the Airport and is strictly controlled, thus does not provide flexibility for the Plan as a whole. 5.57. The above scenarios do not include a detailed analysis of existing commitments and proposed allocations, however from a high level analysis it is evident that the Council’s trajectory and analysis of sites is optimistic. 5.58. Therefore, with an increased housing requirement, reduced potential from existing planning permissions sites and incorporation of a flexibility allowance, further land will need to be identified. 5.59. H. Burtwistle & Son consider that the appropriate areas and sites to accommodate growth would be: - Site 313/245: Northgate, Moorends 5.60. A brief summary is provided for these sites in response to Policy 6. An advocacy has been submitted alongside earlier representations. This report demonstrates that the sites are available, suitable and achievable and therefore deliverable in accordance with the Framework and PPG. 5.61. H. Burtwistle & Son consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 5.62. However, H. Burtwistle & Son consider that with an appropriate uplift to the housing requirement, consideration of net completions, non-implementation rates and the allocation of additional land and safeguarded sites that the Local Plan can be found sound. H. Burtwistle & Son will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 5.63. To overcome the objection and address soundness matters, the Council should: - Increase housing requirement to 1,100 to 1,300 dwellings over the plan period. - Reduce the potential from current commitments and include a non-delivery allowance. - Identify safeguarded land. - Allocate: Site 313/245: Northgate, Moorends
A number of concerns are raised relating to the Level and Distribution of Growth: - The Local Plan housing requirement is not sufficient and is not fully aligned with forecast economic growth. - The Local Plan identifies significantly more employment land than the target for provision established in Policy 3. - There is a significant mismatch between the level of employment land allocated and the level of housing land allocated in the Plan period; and - The identified supply is not sufficient to meet the Councils identified requirement. Need Regeneris Consulting have been commissioned to review the OAN and the Economic Forecasts and Housing Needs Assessment (2018) who conclude that: - The target delivers the minimum level of housing need for Doncaster based on the standard method (585 dpa) and makes an upward adjustment to support future economic growth. - The upward adjustment was based on evidence produced by PBA which recommended housing need is presented as a range between 585 dpa (the minimum) and 912 dpa. The upper limit was based on matching Jobs growth aspirations of the Sheffield City Region LEP (1,420) over the period 2016 to 2026. - However, PBA have made unjustified and unrealistic assumptions for a number of factors which all suppress the level of housing required to support future employment growth. In particular, we disagree with their assumptions about commuting, double jobbing and household formation rates. Regeneris consider that Doncaster’s housing need over the plan period should be 1,100 dpa to support future economic growth. Regeneris consider that the target of 920 dpa would risk constraining the future economic growth of Doncaster. H Burtwistle & Son consider there is potential for the jobs led scenario to underestimate the jobs growth over the full plan period. The associated uplift to the housing requirement will therefore not be sufficient to meet the full needs over the plan period. The Council have identified a requirement for 481 hectares of employment land based on the Job Led scenario, and accounting for the extended plan period between 2032 and 2035. The explanatory text considers that this requirement is met through level of planning permission and 177 hectares of land developed between 2015-2018, 201 hectares of land benefiting from planning permission, and 164 hectares of allocated sites. However, there is a discrepancy between the totals in paragraph 4.61 of the Plan and the figures arising from Tables E1 to E8. The sites that benefit from planning permission in tables E1 to E8 equate to 284.09 ha of employment land available within the Plan period. This leads to a total provision of 565.77 hectares of employment land against a requirement of 481 hectares. It should be noted that within the permissions identified in tables E1 to E8 that additional employment land is available, adding to the potential supply. There is therefore a significant mismatch between the level of planned employment provision in Policy 4 and the planned housing provision. Therefore, the housing requirement needs to be uplifted to reflect the identified level of employment land provision. NPPG indicates that consideration can be given to delivery rates, for the last three years completions have been consistently higher than the proposed local plan target. This demonstrates that there is sufficient demand to support a requirement above 920 dwellings per annum. The Councils Economic Forecasts and Housing Needs Assessment (PBA, 2018) considers that an aspirational job led figure, based on the SEP ambitions, would equate to a requirement of 1,073. PBA considered that it would be prudent to plan for between 562 and 1073. There is therefore evidence of both delivery at a higher rate and recently published evidence that indicates a higher net need for housing. H Burtwistle & Son are concerned that a target of 920 dwellings will not deliver sufficient number and range of affordable homes to meet the identified need for affordable homes in the Borough. In order to deliver 209 affordable dwellings per year, a requirement of at least 1,393 would be required. This assuming the achievement of an average of 15% affordable housing, which represents the highest achieved over the last three years of monitoring. That there is sufficient evidence to point to the need for further uplift in the Local Plan housing requirement, based on the significant mismatch between housing and employment land allocations, the need to support the local plans economic ambitions, evidence of delivery and the need to ensure sufficient delivery of affordable housing. Housing Supply and Delivery At present based on the Councils figures presented in the Local Plan, a Plan requirement of 18400, completions equating to 3400 and allocations equating to 16,055, there is a flexibility of around 1055 dwellings which equates to 5% of the Local Plan Requirement. Consider that this is insufficient given the potential for non-delivery and under delivery of sites, particularly from the dependency on a number of large sites. As set out in our response to a number of policies within the plan and specifically Policies 8, 46, 66 and 67, H Burtwistle & Son are concerned that some of the policies may undermine the deliverability of sites. It is noted that the supply attributed to completions appears to be resultant from gross completions rather than net completions. The Plan indicates that completions between 2015 and 2018 equate to 3400, However data in the Residential Land Availability Report indicates that net completions amount to 3211. Which would serve to increase the residual requirement based on an OAN of 920 to at least 18,719, and reduce the flexibility in the Plan to 866 dwellings (4.7%). The housing trajectory demonstrates that the Council would need to maintain a continuous supply of housing particularly in the later phases of the Plan period. Only four sites are identified as being capable of delivery in the final years of the plan period and two sites delivering beyond the plan period. In terms of existing commitments it appears that the Council assumes 100% delivery and no discount has been applied. Best Practice and Guidance suggests that at least a 10% discount should be applied on sites with extant planning permission but this could vary depending on site specific constraints and complexity. Support the discounting of sites with planning permission but consider it may be beneficial to include a higher level of discount for large sites to take into account unforeseen circumstances and delivery delays. H Burtwistle & Son consider therefore that from a commitments pot of 9,488 dwellings a discount of at least circa 948 should be applied, however this could feasibly be higher given the history and constraints of a number of sites. Concerned with the reliance on some existing housing sites with planning permission and their potential delivery, particularly as some are fairly historic brownfield sites with viability concerns in market challenging areas. There are a considerable number of outstanding planning permissions in poor market areas, some of which are also constrained by flood risk. Evidence of developer interest in such sites should be a fundamental requirement to provide confidence on delivery. The Council therefore need a wider choice of sites across a number of different areas and market areas to gain traction and increase build rates. To achieve the housing requirement the Council need at least 30-35 housing outlets operating across the Borough for every year of the Plan and do not believe the Plan can deliver this, particularly in the middle to later years. Consider the Council should be more realistic on the potential delivery on sites, particularly on sites which have not commenced preparations of securing the relevant planning permission and developer interest and on build rates. H Burtwistle & Son consider that with the sites with no planning permission should not be providing completions until 2023/24 (which is two years post adoption) as there is significant work and preparations to commence on site, including time to prepare and submit the planning application, gain planning permission, discharge conditions, legal agreements, site preparations, and commence house building. This process can take around 2 years. Considers that the main risks to the delivery of the housing requirement are slippages in the delivery of allocations, longer lead-in times, reduced housing capacity on sites, sites no longer coming forward as result of viability from policy obligations set out in the Local Plan. Given these risks a greater flexibility should be incorporated into the Local Plan especially in light of H Burtwistle & Sons conclusions on the actual housing requirement. Taking into account the above, on a best case scenario H Burtwistle & Son consider as a minimum there needs to be circa 3,682 new homes to be identified in the Plan to account for net completions, and economic growth. This does not account for the uplift required to ensure affordable housing need is met in full which would lead to a requirement of 1,393 dpa and a plan requirement of 27,860. Based on the current supply of 3,211 completions, 9,488 commitments, an allowance for 10% non-implementation, and the currently proposed allocations of 6,567 homes, this would leave the Council with an additional requirements of 4,197 dwellings. H Burtwistle & Son consider circa 7,532 additional homes are required to balance the Housing with Employment supply, account for net completions and appropriate non-implementation rates. With an increased housing requirement, a reduction in the level from existing planning permissions signifies incorporation of a flexibility allowance, further land will need to be...
Response:
A number of ways and means have been submitted to calculate housing and jobs figures for the Local Plan. The Peter Brett’s Report explains the approach taken and ties jobs to housing growth, which includes a significant uplift from the Standard Methodology Figure. The Housing Topic Paper explains how figures have been calculated and where deductions have been made for permissions etc., and also covers the delivery trajectory. The Site Selection Methodology explains how site delivery has been calculated and justifies the proposed build out rates. Other evidence base has been updated for submission. Where adaptations have been made to account for the extension to the plan period since this report was finalised, they have been made to both housing and employment respectively. The difference in the employment figures quoted are the result of tables showing different information. It is accepted that this is confusing and this has been amended to be more clear. The correct employment figure is 481ha and enough employment land has been found to deliver this, and enough housing too meet this arising need too. The standard methodology already makes allowances for affordability ratios and the Local Plan has already almost doubled this figure with the 920dpa requirement so will be delivering more affordable housing which will increase supply/competition and help to bring down affordability even further. Doncaster Council has ambitious plans to deliver more affordable homes, including more council housing, as part of a wider delivery programme. During 2019/20, the first developments will include a range of general needs and more bespoke accommodation. Sites will be funded through a combination of Housing Capital Programme funds; the use of One-for-One capital receipts from Right to Buy sales; and grant funding allocated from the Homes England Shared Ownership and Affordable Housing Programme (SOAHP) 2016/21 should the future bid be successful. Other initiatives and strategies, such as the Council’s Inclusive Growth Plan, are seeking to address issues such as skills and productivity/increasing wages etc. which will also assist people in being able to afford/access housing.
6.1 Peel has commissioned Turley Economics to undertake a technical review of proposed housing provision contained within the Local Plan. 6.2 The technical report can be found in Appendix 3. (See Email for Appendix) 6.3 In summary, the report identifies that whilst Peel strongly supports the draft Local Plans intention to deliver housing need over and above the standard method in recognition of the economic potential of the borough, it is considered that the draft policies relating to the planned provision for housing require amendment to be found sound when judged against the Framework and the associated Planning Practice Guidance. This deficiency in soundness is identified in a number of specific areas including the following: - While the LP seeks to deliver housing need (note 3 - 920 dwellings per annum) above the standard method (note 4 - 550 dwellings per annum), draft policy 3 expresses the housing requirement as a range using both figures; this is not considered to be justified in the context of the Framework. - The minimum housing requirement figure as generated by the standard method is unrepresentative of actual housing need in the borough with evidence demonstrating that the population of Doncaster is already larger and growing to a much greater extent than it predicted. Moreover, recent and longer-term housing delivery in the borough has been around double the minimum figure generated through the standard method which must be taken into account in future plan making. - While the Council accepts it is more appropriate to plan for a greater level of housing need, this is at risk of being undermined by retention of the standard method at the lower end of an unjustified range. Retention of it in the policy and the practical application of such a policy could markedly and unjustifiably reduce and constrain housing delivery. Such an approach is not positively prepared or consistent with national policy. - There is evidence of still greater need for housing than that which is acknowledged by the Council at the upper end of range proposed by the draft LP. The Council's own published evidence base confirms that an average of 1,060 dwellings per annum is likely to be needed through most of the plan period to accommodate a labour force required to support targeted housing growth of 1.0% per annum but potentially still underestimating the scale of employment growth attainable in Doncaster. Peel considers that this level if need should be explicitly recognised in the explanatory text of the policy. This emphasises the importance of policy 3 identifying a single housing requirement aligned with supporting economic growth as a minimum housing requirement for the borough and the LP should be revised accordingly.

**Comment:**

Peel commissioned Turley economics to undertake a technical review of housing provision contained within the Local Plan. (Report provided). The report identifies that whilst Peel strongly support the draft Local Plans intention to deliver above the standard method in recognition of the economic potential of the borough, the policies relating to planned provision need amending to be found sound against the framework and PPG. There is a deficiency in soundness identified in a number of specific areas: - The use of the range is not considered justified in the context of the framework - The standard methodology number is unrepresentative of actual housing need in the borough. The population is already larger and growing to a much greater extent than predicted. Recent and longer term housing delivery in the borough has been around double the minimum figure generated through the standard method - Whilst the Council accepts it is appropriate to plan for more than the standard method, it is undermined by retaining the standard method at the lower end of an unjustified range. Retention of it in policy and the practical application of such a policy could markedly and unjustifiably reduce and constrain housing delivery. It is not positively prepared or consistent with national policy. - There is evidence of still greater need for housing that the upper end of the range, as accepted by the council. The Council’s own evidence confirms an average of 1,060 dpa will likely be needed throughout the plan period to accommodate the labour force required to support the housing target growth of 1% p/a, but potentially still underestimating the scale of employment growth attainable in Doncaster. This level should be explicitly recognised in the explanatory text of the policy and emphasises the importance of a single housing requirement aligned with supporting economic growth as a minimum housing requirement. The LP should be revised accordingly.

**Response:**

National guidance is clear on the use of the Standard Methodology, and the Council are planning for a 57% increase above this figure. Planning Practice Guidance also refers to using a range (Housing Supply and Delivery - Paragraph: 027 Reference ID: 68-027-20190722). Although housing delivery has been stronger in more recent years, the average net completions since 2011/12 is 837dpa, and if extended to 2004/05 is actually 679dpa. This is further explained in the Housing Topic Paper. Many ways have been put forward as to how the housing figure could be calculated, however, the Council are confident that the work by Peter Bretts provides a suitable and justified housing target for the borough which is ambitious but achievable.
Rossington Hall Investments Ltd (RHI) objects to the significant reduction on the overall housing requirement for Doncaster MBC proposed in this Draft Policy compared to the figure proposed by the Council in Policy CS10 of its Core Strategy (2012). The Policy suggests that the Local Need figure, as derived from the Standard Methodology for the Borough is 18,400 homes over the period 2015-2035 i.e. 920 dwellings per annum (dpa) compared to the figure of 20,910 dwellings (2011-2028) i.e. 1230 dpa in the adopted Core Strategy. On this basis RHI consider the Local Plan is not positively prepared as it fails to provide housing to meet a real need. 2. Whilst it is acknowledged that the plan periods are not exactly comparable the degree of variation between the two figures is very large and must therefore be questioned. Such a significant reduction in projected housing need is counter intuitive given the progress that has been made in the Borough in recent years in terms of promoting new economic growth and the continuing rise in the Borough’s population. 3. It appears that just as progress is being made on economic growth and new job creation, and house building rates are starting to accelerate, the Council is seeking to restrict the supply of housing in the Borough and damp down growth prospects. This is not sustainable and RHI would therefore object to this figure and seek the adoption of higher requirement figure in line with the more aspirational figure of 1230 dpa contained in in the Core Strategy. 4. Rossington Hall Investments Ltd would seek greater recognition of this high level of sustainability and the significant opportunities for further improvements in the future in the settlement hierarchy in a manner similar to that adopted in the Core Strategy 2012 which identified Rossington as a ‘Growth Town’. The Settlement Audit and subsequent Profile indicated that ‘Rossington is one of the best provided for settlements in the borough in terms of service provision’ and that its offer of services is ‘more akin to a District Centre’. As a result RHI consider that Rossington should be identified as a location for meeting more than just ‘local needs housing growth’ ‘on a pro-rata basis’. It should instead be the focus a for a significantly larger percentage of the economic-led housing growth as discussed below. This will allow the Local Plan to be positively prepared and effective as it currently fails to deliver a housing strategy which meets a real need. 5. Policy 3 indicates that Rossington will account for around 285-895 of the new homes in the Borough. The housing requirement to meet ‘base line growth’ over the plan period is just 385 dwellings (i.e. 25 dpa). Chapter 16/Policy 6 sets out the housing allocations for Rossington. Table H1(G) shows a total allocation of 1219 for the town, 897 of which already have planning permission, and a further 322 have been allocated that currently do not benefit from planning permission. 6. RHI also consider the number of allocations in Rossington fall short of what is required, and the Local Plan fails to recognise the growth potential of Rossington that derives from its location adjacent to the M18, improved accessibility resulting from the construction of Great Yorkshire Way, the expected 5000+ jobs at iPort and further social housing, retail and community development at Torne Park. 7. On this basis RHI consider than in order to capture the full benefit of these developments the overall housing requirement for Rossington over the plan period, to be proposed as part of the new Local Plan needs to be raised substantially from the 895 maximum currently suggest in Policy 3, sufficient to allow for the full development of the consenting dwellings and further housing development in sustainable locations in and around the town such as on our client’s land at South of Grange Road, Rossington - see the accompanying Planning Appraisal Report. RHI would suggest a figure in the region of 1500-1600 would be more appropriate. (SEE EMAIL FOR Appraisal Report) PROPOSED CHANGE 1. As set out above, RHI consider the Local Plan is not sound on all aspects. 2. In order to make the Local Plan sound a Safeguarded Land policy should be included. This would make the Local Plan effective, justified and national policy compliant. 3. Further to this, Policy 2 needs to allow more flexibility with regard to housing allocations rather than being distributed on a ‘pro-rata basis’. This would mean that the plan is positively prepared and allows for development to adapt as circumstances change across the plan period. 4. RHI consider that the site South of Grange Road, Rossington should be removed from the Green Belt as it fails to meet any of the five purposes set out in para 134 of the NPPF. 5. On this basis RHI would suggest that Rossington should be a focus for a larger proportion of housing development than currently proposed and the site South of Grange Road should be allocated or safeguarded for housing development to reflect this position/potential.

Summary:

Rossington Hall Investments (RHI) objects to the significant reduction on the overall housing requirement compared to the figure in Policy CS10 of the Core Strategy and on this basis consider the Local Plan not positively prepared as it fails to provide housing to meet the needs.  This is not sustainable and RHI object to the housing figure and seek adoption of the higher requirement (1230dpa) contained within the Core Strategy.  RHI seek greater recognition to the manner similar to that in the Core Strategy ‘Growth Town’ and the subsequent profile in the Settlement Audit and result in Rossington identified as a location for meeting for than just local housing growth. It should be the focus for a significantly larger percentage of economic-led housing growth which will allow the Local Plan to be positively prepared and effective. RHI considers the Local Plan fails to recognise the growth potential of Rossington and RHI consider that in order to capture the full benefit of the developments in and around Rossington the overall housing requirement for Rossington need to be raised substantially to 1500-1600. RHI consider that the site South of Grange Road Rossington should be removed from the Green Belt as it fails to meet any of the five purposes set out in para 134 of the NPPF and should be allocated or safeguarded for housing to reflect the potential/policy.
The Core Strategy will be replaced by the Local Plan and was a non-objectively assessed housing figure that originated from a previous Government’s national planning policy and pre dates the NPPF, having originally been identified in the Regional Spatial Strategy. The Standard Methodology figure derived a figure of 585 dwellings per annum for Doncaster which would be a 20 year plan period requirement of 11,700 and not 18,400 that the Representation quotes. This requirement is the result of a significant (nearly 40%) uplift to the Standard Methodology figure to a plan period requirement of 920 dpa or 18,400 homes in total and is therefore positively prepared. It is not clear of evidenced therefore why the Representation feels that housing supply is now being restricted and part of the reason for having to withdraw the previous Development Plan (Sites & Policies DPD) was due to it being a follow-on from the Core Strategy which, as before, was a non-objectively assessed and therefore non-NPPF compliant housing requirement which was made clear by the courts in 2012. The Local Plan’s identification of Rossington as a Main Town makes clear the settlements performance as one of the Borough’s most sustainable and larger settlements. The Policy and settlement’s housing requirement does assign economic-growth-led housing (up to 559 dwellings) to the town in addition to local housing need (285 dwellings). There has been various competing calls for different settlements to have a “bigger slice of the cake” none of which amount to a more justified or coherent strategy.
Policy 3: Level & Distribution of Growth

Tests of Soundness: Positively prepared Justified

Pegasus Group

Chapter 4: Strategic Approach

The Gascoine Group Ltd

Policy 3: Level & Distribution of Growth

4.1 The policy is not sound as it is not positively prepared, justified, consistent with national policy or effective. Housing Requirement 4.2 Policy 3 of the Publication Draft of the Local Plan sets a target for at least 920 (net) new homes each year over the plan period 2015-2035 (18,400 homes in total) with sufficient land allocated to deliver the housing requirement. 4.3 This proposed level of housing growth remains unchanged since the draft policies consultation in 2018. Therefore, Pegasus continue to question whether this approach to meeting the needs for new homes demonstrates that the Plan is positively prepared and justified. The reasons for this remain as the previous representation: a) The Borough has a clear economic growth agenda - this is evidence in the draft Local Plan’s Vision and Objectives. Doncaster forms a key part of Sheffield City Region and target metrics produced independently for SCR LEP (note 1 - 1 Source: Target Metrics Sheffield City Region: Metro Dynamics, June 2017) identify the need for jobs growth of 1.0% p.a. if the City Region is to improve its performance relative to the UK. Given that Doncaster has seen employment increase either at or above the levels experienced by SCR since 1998, and in line with its positive growth aspirations, it does not seem unreasonable to expect the Borough to align with the City Region target and for jobs growth in the District to average 1.0% in the long-term. Long-term economic aspirations should be properly planned for within this land use plan, to facilitate these aspirations becoming a reality. The impact of this would be to increase housing requirements from the current OAN of 920dpa to 1,073dpa - an additional 153 homes per annum. b) Affordability ratios in Doncaster have changed little over the past decade (4.81 - Source: 2018 Affordability Ratio Data), suggesting that the housing ladder remains out of reach for a substantial part of the local population. Build rates will therefore need to be high in the long-term to address this issue. Housing completion data for the Borough from 2004/5 and 2017/18 shows that it is capable of delivering in excess of 1,000 units per annum. c) The Office for National Statistics (ONS) published variant household projections in December 2018. These considered a range of variant projections to assist users in examining future growth scenarios. At this stage a variant which includes higher household formation rates for younger adults (those aged 25 to 44 years) has not been provided. The ONS is currently considering how to robustly evidence this variant. This variant will be critical as evidence suggests that such households were unable to form as freely as previous generations (due to high house prices, less access to finance etc.). An increase in housing numbers in Doncaster will help ensure that supply is able to meet demand - especially from younger adult who move into the area. 4.4 The PPG states the Government will be supportive of authorities who wish to plan for growth. In addition, the PPG identifies other factors which need to be considered when determining the housing requirement. These include growth strategies, planned infrastructure, previous levels of delivery and recent assessments of need such as Strategic Housing Market Assessments (SHMA) where this suggests a higher need (PPG ID 2a-010). These are all important considerations in the context of Doncaster. 4.5 Table 4.1, below, identifies net completions over the 14-year period from 2004/5 to 2017/18. During this period delivery rates have averaged 1,013 net additional dwellings. Since the start of the plan period (2015) average delivery rates have been higher at 1,140 net additional dwellings. Setting the housing requirement nearly 100 dwellings per annum (dpa) lower than average levels of delivery over the previous 14 years and 220dpa lower than the plan period average, would be contrary to the ethos of the NPPF and the Government’s continued desire to boost significantly the supply and delivery of housing. 4.6 To assist in the determination of the appropriate housing requirement, three alternatives have been considered through the SA. These are; - Option 1: 920dpa and 481ha employment land; - Option 2: 585dpa and 103ha employment land; and - Option 3: 753dpa and 242ha employment land. 4.7 The SA identifies Option 1 as the preferred option as it will "...meet local need but also enable employment-led growth in accordance with the Sheffield City Region Plan, whilst providing a degree of flexibility?" (SA, para. 5.3.5). From the options considered it is agreed that this is the most appropriate. However, the Council has failed to consider an option which promotes a higher housing requirement than 920dpa. Given previous rates of delivery, identified in table 4.1 above, it is considered a figure in excess of 1,000dpa should have been considered as a reasonable alternative. 4.8 Following setting the housing target for the Local Plan Period, draft Policy 3 progresses to state: "For the purposes of calculating 5-year housing land supply, the requirement will be based on the Local Housing Need figure, as derived from the Standard Methodology, which will be reviewed and revised throughout the plan period in line with the latest household projections and affordability ratio. As such, the housing requirement is expressed as a range with the bottom of the range being the Local Housing Need figure and the top of the range being 920 dwellings per annum; 4.9 Pegasus have concerns regarding the Council’s proposed approach to calculating 5-year supply and the overall wording of Policy 3 in this regard. 4.10 Frist, Policy 3 sets a target for at least 920 (net) new homes each year over the plan period, but then when discussing the ‘range of housing need’ states that the top range of local housing need figure is 920dpa. Clearly, these two statements are contradictory to each other. 4.11 Second, we contend that the approach of Policy 3 in applying a lower housing need figure for
the purposes of calculating 5-year housing supply is contrary to the approach of Policy 3 in setting a minimum requirement. We would question how, in the context of the need to significantly boost housing supply, seeking to meet a figure significantly below the minimum housing target and previous levels of delivery could be considered to be a pro-active or positive approach. Bawtry Housing Distribution 4.12 Bawtry is identified as being one of Doncaster’s Service Towns and will contribute to the overall 10% split of total housing development alongside Askern; Auckley-Hayfield Green; Barnburgh-Harlington; Barnby Dun; Carkcroft and Skellow; Edlington; Finningley; Sportborough; and Tickhill. I refer to our objections to Policy 2 with regards the percentage split identified. 4.13 In the Case of Bawtry itself, the Publication Draft identifies a requirement for growth of 110 dwellings across the plan period. However, the Council propose to allocate only 90 dwellings in the settlement, split between sites with and without planning permission. This means that there is a 20-dwelling shortfall between the number of units allocated and the settlement target growth. Paragraph 16.194 of the Local Plan discusses this matter stating: “As at 1st April 2018, there are permissions for 54 dwellings on sites large enough to allocate through the Local Plan (5+ units remaining). An additional two relatively small allocations are made through the plan; one being a greenfield urban site and the other a greenfield extension on land formerly designated as Green Belt. These two sites have a combined capacity of 36 new homes and bring the settlement’s housing allocation up to 90 dwellings for the plan period, which is 20 units short of its requirement. Any additional allocations would require large urban extensions on land currently designated as Green Belt where it is not considered exceptional 240 [go to Contents] circumstances exist to remove further sites for such a small shortfall in the context of additional sources of housing supply in the town. For example, at April 2018 there are permissioned small sites (1-4 units) that total 14 new homes and there will be additional windfall development within the town throughout the plan period so confidence that the town's requirement of 105 new homes will have been met.” 4.14 As stated within Paragraph 16.194, the Council believe that meeting the 20-dwelling shortfall in Bawtry would require large urban extensions not appropriate for such a shortfall in the supply. Pegasus question the scale of the shortfall within Bawtry due to our comments relating to the housing requirement and distribution. Furthermore, the site at Land West of Bawtry Hall could accommodate some of this growth without large scale changes to the Green Belt. 4.15 Paragraph 16.194 suggestion to overcome the shortfall is that the remainder of the need can be met through windfall development in the settlement across the plan period. This statement is however contrary to the subtext of Policy 6: Housing Allocations (Strategic Policy), which at policy 4.83 states: “The allocated supply has not been reduced to make allowance for windfalls and so all windfalls will be additional land supply to meet the plan period requirement.” 4.16 Despite this statement, it is clear that the Council have reduced the allocated supply to make allowance for windfalls in Bawtry. We believe this approach is flawed and additional allocations should be made to meet the required shortfall rather than relying upon windfall development. 4.17 Pegasus are concerned with any reduction or limitation on the housing target for a settlement purely on the basis that it is in a Green Belt location. The housing target for a settlement should be made to focus on the need to ensure the settlement can grow in a sustainable manner to support the local community and its population. Housing allocations, and Green Belt release, should then be made according to meeting that need.

Summary:

Policy 3: Level and Distribution of Growth Doncaster forms a key part of Sheffield City Region; its not unreasonable to expect the Borough to align with the City Region target and for jobs growth in the District to average 1.0% in the long-term. should plan for long term economic aspirations which will lead to an increase housing requirements from the current OAN of 920dpa to 1,073dpa Affordability ratios in Doncaster have changed little over the past decade, suggesting that the housing ladder remains out of reach for a substantial part of the local population. Build rates will therefore need to be high in the long-term to address this issue. Provides table of information on housing delivery 2004 to 2018. Option 1: 920dpa and 481ha employment land is preferred option in 5A to meet local need and enable employment led growth. Pegasus have concerns regarding the Council’s proposed approach to calculating 5-year supply and the overall wording of Policy 3 in this regard. Policy 3 sets a target for at least 920 (net) new homes each year over the plan period, but then when discussing the ‘range of housing need’ states that the top range of local housing need figure is 920dpa. Clearly, these two statements are contradictory to each other. Housing completion data for the Borough from 2004/5 and 2017/18 shows that it is capable of delivering in excess of 1,000 units per annum. council should not use lower housing need figure for the purposes of calculating 5-year housing supply is contrary to the approach of Policy 3 as it will not boost housing supply. using the lower housing need figure is not pro-active or positive. Paragraph 16.194 states meeting the 20-dwelling shortfall in Bawtry would require large urban extensions not appropriate for such a shortfall in the supply and remainder can be met by windfalls. statement is however contrary to the subtext of Policy 6. Pegasus question the scale of the shortfall within Bawtry due to comments relating to the housing requirement and distribution. Land West of Bawtry Hall could accommodate some of this growth without large scale changes to the Green Belt. additional allocations should be made to meet the required shortfall rather than relying upon windfall development. should focus on sustainable growth and not the reduction of a housing target figure based on greenbelt location. Housing allocations, and Green Belt release, should then be made according to meeting that need

Response:

Completions data from 2004 - 18 shows that 1,000dpa net has only been exceeded on three occasions (2015/16; 2016 - 17 & 2017 / 18). There have also been years where the figure is significantly below this. On average 2004 - 2018, 679dpa have been delivered in the borough. Although Bawtry falls short of its housing requirement, this is by a relatively small amount that could be made up by windfalls. There are no other suitable urban sites in this location, and there are not deemed to be any exceptional circumstances for further Green Belt release in this location. The Housing Topic Paper and Green Belt Topic Paper explains the approach further.
To allow participation in discussions regarding the settlement strategy, proposed housing requirement and distribution of development including site selection and allocations.

Exceptional circumstances can only be demonstrated where all other reasonable alternatives have been fully considered. No consideration appears to have been given to alternative distributions of housing growth that could reduce or eliminate the need for Green Belt to be released. It is entirely possible that, in the round, some other distribution of new homes would be more sustainable. The Sustainability Appraisal assessed four potential options for delivering the growth needs and aspirations of the Borough. This included 1. Core Strategy Approach; 2. Doncaster and Main Town Focus; 3. Greater Dispersal Strategy; and 4. Hybrid Option based on a combination of options 1 and 2. There was no option appraised of minimising the amount of Green Belt. 2.43 This matter was considered at length in the recent examination of the Cheshire East Local Plan Strategy. Like Doncaster, Cheshire East is partly constrained by Green Belt and partly not. By the end of the examination process, the number of new homes that were proposed for development in settlements surrounded by Green Belt was lower than it would have been without Green Belt being a constraint. For example, commenting specifically about Wilslow, the fourth largest settlement in the borough, the Inspector observed at paragraph 281 of his report (see Appendix 3) that: "The town does not have many potential brownfield sites and is tightly constrained by the Green Belt; the proposed amount of development is therefore less than proportionate to its size and population." (SEE EMAIL FOR Appendix) 2.44 In reaching his conclusion on the spatial distribution and Green Belt constraints, at paragraph 83 of his report the Inspector stated that: "I considered that the revised spatial distribution of development represents a realistic, rational and soundly-based starting point for the spatial distribution of development; it is justified by a proportionate evidence base and takes account of the relevant factors, including the crucial importance of the Green Belt and the outcome of other studies undertaken during the suspension period." 2.45 This sort of balancing exercise has not been carried out by Doncaster Council. Instead, conformity with the spatial distribution appears to have been used as a "trump card" which outweighs other Green Belt constraints. In his report on the Sites and Policies Development Plan Document, the Inspector observed that the Council had demonstrated "a lack of flexibility in its decision-making" when it came to site selection. This comment was aimed at the lack of consideration given to matters of flood risk - a short coming which the current Local Plan purports to have made some steps to address. However, the claimed increased focus on avoiding development in areas that are of a high risk of flooding has been replaced by an apparent disregard for the importance of protecting the Green Belt - that same "lack of flexibility" is being demonstrated again. 2.46 Exceptional circumstances can only be demonstrated where all other reasonable alternatives have been fully considered. Yet that has not been done. For example, Site 1013 in Auckley has not been assessed at all in the Local Plan process. As a site that is not in the Green Belt, that is not at risk of flooding, and that is sustainably located, it must be a reasonable alternative to releasing Green Belt. The Green Belt Background Paper includes a table of the Main Constraints of each settlement (paragraph 2.3.57). Of the 18 settlements, Auckley - Hayfield Green is the only settlement with 'no major constraints'. The other settlements all had main constraints identified, which primarily comprise of Green Belt and areas of high risk Flood Zones. 2.47 The Council refer in the Green Belt Background Paper at 3.3.42 that: "The view of the local planning authority is that flood risk is a physical constraint which can be a risk to life and property, whereas Green Belt is a planning tool, albeit an important one. Therefore, land at risk of flooding will be strictly avoided for allocations, whereas Green Belt can be considered where appropriate and ideally where the impact will be less great on the purposes of this designation." 2.48 While we do not disagree with the distinction between flood risk and Green Belt constraints, there is a lack of explanation for the Council's approach to identifying Green Belt locations within the Borough and a lack of analysis of alternative options in sustainable areas that minimise the need to release Green Belt. The Green Belt Background Paper goes on to state that the Local Plan is not overly dependent on the Green Belt to deliver its housing requirement. It states that only 1,002 dwellings or 7.6% (of the 15 year allocated requirement of 13,235), or 6.68% (of the 17 year requirement of 15,000) are proposed on land currently allocated as Green Belt. (paragraph 3.3.46). 2.49 Whilst the Local Plan may not be overly dependent on Green Belt and only allocates 1,002 dwellings on land currently in the Green Belt, there does not appear to be sufficient evidence that this is the minimal amount possible, nor is there any alternative appraisal of allocating sites on non Green Belt unconstrained sites. The Sustainability Appraisal ('SA') hasn't given consideration to an option of minimising the amount of Green Belt development. In fact the SA predicts that the appraisal of Option 4 (which is the preferred SA distribution option) "will have a greater impact on the openness of the Green Belt and countryside than Options 1 and 2" (SA Paragraph 5.2.29). 2.50 It is clear that all other reasonable options have not been considered, and the Council's exceptional circumstances have not been demonstrated. Whilst some development in the Green Belt may be required, the Council should use every effort to identify every alternative to ensure the amount of Green Belt required is minimised.
Summary:
Maintain that the council has not taken adequate account of development constraints when arriving at the distribution - particularly with the Green Belt. The council's approach is that the preferred housing distribution justifies that exceptional circumstances exist. In order to achieve distribution, Green Belt must be released. This does not constitute exceptional circumstances. No consideration has been given to alternatives which would reduce or eliminate the impact on the Green Belt. It's possible another distribution could be more sustainable. The options in the Sustainability Appraisal did not include an option for minimising the amount of Green Belt. The matter was considered in the Cheshire East Plan. Cheshire East is half Green Belt / half not. Not. By the end of the examination process, the number of new homes that were proposed for development in settlements surrounded by Green Belt was lower than it would have been without Green Belt being a constraint. Balancing such as that undertaken by Cheshire East has not been undertaken in Doncaster. The spatial strategy is a trump card which outweighs other Green Belt constraints. The council is showing the same lack of flexibility in this matter that it was criticised for doing in relation to flood risk by the previous inspector. Other reasonable alternatives have not been fully considered so exceptional circumstances cannot be demonstrated. Site 1013 has not been assessed at all in the Local Plan process. It is not Green Belt or flood risk, it is sustainably located and must be a reasonable alternative to Green Belt. The Housing Topic Paper admits the area is the only settlement with 'no major constraints', all others have either Green Belt or Flood Risk as a constraint. There is a lack of explanation of the Council's approach to identifying Green Belt locations and a lack of analysis of alternative options in sustainable areas to minimise Green Belt release. Although the Green Belt Topic Paper notes the council is not overly dependent on Green Belt, there is not sufficient evidence that the Green Belt to be allocated is the minimal amount possible and no assessment of unconstrained sites in non Green Belt areas. The SA has not considered an option of minimising Green Belt development and admits option 4 (preferred) has more impact on the Green Belt than 1 or 2. Not all reasonable options have been considered and exceptional circumstances have not been demonstrated. Some Green Belt sites may be required but every attempt should be made to find alternative sites.

Response:
The approach is explained in the Green Belt Topic Paper, which explores why the constraints the borough faces and its spatial strategy mean Green Belt release is necessary in some locations. This has only been done where exceptional circumstances exist, consideration has been given to alternative approaches, as the Topic Paper explores. Location of a site is not a sole exceptional circumstance, but forms part of the consideration with other factors. Doncaster Local Plan and its approach should be judged on its own particular local circumstances, a comparison to other area similarities does not consider the particular circumstances of each Local Plan. Site 1013 was assessed in detail (see Site Selection Methodology) and the Council produced a number of topic papers and evidence base for the publication version of the plan, covering the issues mentioned in detail. It is acknowledged balancing protecting the Green Belt with delivering a sound spatial strategy is difficult, however the alternatives to using Green Belt would effectively be large scale development in smaller and less sustainable locations to the south east of the borough, which is not in line with the preferred and consulted on approach.
2.57 The identified allocated sites in the Local Plan (Chapter 16) do not align with the proposed distribution of the housing requirement as outlined in Policy 3. Table 1 below overleaf a number of settlements where the allocations fall outside the proposed requirement ranges and service town and villages requirements. Settlement Hierarchy Tier In Local Plan: Doncaster Main Urban Area Constituent Towns: Contiguous built up area of Doncaster Town Local Plan Targets - No: 6805 - 7315 Local Plan Targets - %: Local Plan Allocations - No: 7441 Local Plan Allocations - %: TOTAL Local Plan Targets - No: Local Plan Targets - %: "At least 50%" Local Plan Allocations - No: 7441 Local Plan Allocations - %:46.2% Settlement Hierarchy Tier In Local Plan: Main Towns Constituent Towns: Adwick - Woodlands Local Plan Targets - No: 255-765 Local Plan Targets - %: Local Plan Allocations - No: 482 Local Plan Allocations - %: Constituent Towns: Armthorpe Local Plan Targets - No: 420-990 Local Plan Targets - %: Local Plan Allocations - No: 1049 Local Plan Allocations - %: Constituent Towns: Conisborough & Denaby Local Plan Targets - No: 465-975 Local Plan Targets - %: Local Plan Allocations - No: 528 Local Plan Allocations - %: Constituent Towns: Dunscliff, Dunscliffe, Hatfield & Stainforth Local Plan Targets - No: 575-1805 Local Plan Targets - %: Local Plan Allocations - No: 1968 Local Plan Allocations - %: Constituent Towns: Mexborough Local Plan Targets - No: 475-985 Local Plan Targets - %: Local Plan Allocations - No: 310 Local Plan Allocations - %: Constituent Towns: Rossington Local Plan Targets - No: 285-895 Local Plan Targets - %: Local Plan Allocations - No: 1219 Local Plan Allocations - %: Constituent Towns: Thorne & Moorsends Local Plan Targets - No: 510-1020 Local Plan Targets - %: Local Plan Allocations - No: 736 TOTAL Local Plan Targets - No: Local Plan Targets - %: "About 40%" Local Plan Allocations - No: 6292 Local Plan Allocations - %: 39.0% Settlement Hierarchy Tier In Local Plan: Service Towns and Villages Constituent Towns: Askern Local Plan Targets - No: 165 Local Plan Targets - %: Local Plan Allocations - No: 691 Local Plan Allocations - %: Constituent Towns: Auckley - Hayfield Green Local Plan Targets - No: 125 Local Plan Targets - %: Local Plan Allocations - No: 255 Local Plan Allocations - %: Constituent Towns: Barnburgh - Harlington Local Plan Targets - No: 60 Local Plan Targets - %: Local Plan Allocations - No: 66 Local Plan Allocations - %: Constituent Towns: Bamby Dun Local Plan Targets - No: Local Plan Targets - %:105 Local Plan Allocations - No: 104 Local Plan Allocations - %: Constituent Towns: Bawtry Local Plan Targets - No: 110 Local Plan Targets - %: Local Plan Allocations - No: 90 Local Plan Allocations - %: Constituent Towns: Carcroft - Skellow Local Plan Targets - No: 250 Local Plan Targets - %: Local Plan Allocations - No: 307 Local Plan Allocations - %: Constituent Towns: Edlington Local Plan Targets - No: 230 Local Plan Targets - %: Local Plan Allocations - No: 665 Local Plan Allocations - %: Constituent Towns: Finningley Local Plan Targets - No: 55 Local Plan Targets - %: Local Plan Allocations - No: 50 Local Plan Allocations - %: Constituent Towns: Sprotbrough Local Plan Targets - No: 95 Local Plan Targets - %: Local Plan Allocations - No: 80 Local Plan Allocations - %: Constituent Towns: Tickhill Local Plan Targets - No: 165 Local Plan Targets - %: Local Plan Allocations - No: 74 Local Plan Allocations - %: TOTAL Local Plan Targets - No: Local Plan Targets - %: "About 10%" Local Plan Allocations - No: 2382 Local Plan Allocations - %: 14.8% Table 1: Comparison of Publication Local Plan Housing Targets (Policy 3) and actual allocations in the Publication Draft. 2.58 The overall percentages of proposed allocations are broadly in alignment with the target (50% to Main Urban Area, 40% to Main Towns, and 10% to Service Towns and Villages). While the Service Towns and Villages proposed allocations are above the target 10%, the three Service Towns and Villages of Askern, Edlington, and Carcroft-Skellow account for 70% of the proposed allocations in this tier of the hierarchy. These three settlements were previously either Principal Towns or Renewal Towns in the Core Strategy with significant proportions of housing growth targeted for them. These three settlements receive allocations higher than the proposed Local Plan target (significantly so for the cases of Askern and Edlington). The over provision in the Service Towns and Larger Villages is directed to former Core Strategy higher order settlements that were expected to take a lot of growth. In relation to the proportion of development the Local Plan allocation distribution is not too dissimilar to the Core Strategy distribution.

Summary:
The distribution aligns with 50% MUA; 40% Main Towns and 10% Service Towns. However, in the Service Towns, Askern, Edlington and Carcroft - Skellow account for 70% of proposed allocations in this tier of the hierarchy. These were all previously principal or renewal towns in the Core Strategy with significant growth directed to them. These three receive allocations much higher than their housing growth (significantly so for Askern and Edlington). The distribution is therefore not too dissimilar from the Core Strategy where over provision is sent to the former higher order Core Strategy locations.

Response:
The settlements mentioned are the largest and most sustainable of the Service Towns and therefore have a larger allocation. Due to commitments they are able to deliver 70% of the overall amount of housing that will be delivered in this tier, but this does not prejudice other areas delivering their housing requirement, nor does it offset the requirement of other areas. By applying a cap once the number of dwellings delivered exceeds the target, it is ensured that other settlements in this tier will also largely meet their housing requirement. Of the 10% for the Service Towns, 53% of Service Town supply 2018 - 33 will be in these settlements, slightly above the collective target for the three of 47% overall based on their share of the baseline. This is explained further in the Housing Topic Paper.
2.39 We have a number of concerns regarding the distribution of the housing requirement set out in Draft Policy 3. The Settlement Background Paper 2018 was prepared in support of the previous informal Local Plan consultation and explains the distribution. It is however disappointing that an updated Topic Paper is not available until Plan Submission, which will explain "the distribution of housing to individual settlements and the issues relevant to each further, such as the influence of existing planning permission reducing the need for new allocations or impacts or impacts on constraints such as flood risk." This information should be available at Publication stage to allow representors a reasonable opportunity to comment on the Plan. 2.40 The Settlement Background Paper explains that the baseline housing requirement (minimum Standard Method) is distributed across the settlements based on their percentage of the Borough’s households. Aside from our objections to the lack of uplift above the Standard Method to the Service Towns and Larger Villages we maintain our disagreement with this rather simplistic way of distribution which does not factor in the sustainability of a settlement; or the ability of a settlement to deliver their minimum requirement quota. This distribution does not account for recent growth in an area which will then result in proportionately higher growth in the plan period, and disadvantages settlements that may not have grown in the past.

Response:

An update to the housing section was published for the 2019 consultation - Doncaster Housing Background and Strategy, and the employment section was also updated in the ELNA. The Housing Topic Paper 2020 covers the approach to housing in the Local Plan. The approach has been consulted on and was the preferred approach and method for distributing housing as equitably as possible whilst ensuring the most sustainable locations got larger shares - this has long been the established approach.
Comment:  
2.35 We object to Policy 3 only seeking to identify sufficient land to deliver 15 years’ supply of housing, when the plan period covers 20 years (2015 - 2035). Paragraph 22 of the Framework (2019) states that strategic policies: "should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities." (our emphasis) 
2.36 There is no justification in the Framework for identifying land for only 15 years. Identifying housing for the full plan period would be in accordance with the Framework. Furthermore, Policy 3 seeks to facilitate the delivery of at least 481 hectares of employment land over the plan period, therefore the Local Plan should equally identify land to meet the housing requirement over the plan period. Policy 3 should seek to identify homes sufficient to deliver the housing requirement for the whole plan period, which would accord with all the soundness tests in the Framework. 
2.37 Paragraph 136 of the Framework is clear that where there is a need for Green Belt changes regard should be had for the intended permanence in the long term, so they can endure beyond the plan period. At present this authority is seeking Green Belt release in the Local Plan. Notwithstanding our comments on the appropriateness of the Green Belt release sites and the need to look at other suitable and sustainable sites ahead of Green Belt release, allocation of housing land for the full plan period should be identified to ensure that the any proposed Green Belt can benefit from the required degree of permanence. Identifying only 15 years’ worth of land risks a further Green Belt review ahead of the end of the plan period. 
2.38 It is considered that this approach fails the "consistent with national policy" soundness test.

Summary:  
Object to only 15 years worth of housing land being identified when the plan lasts 20 years. NPPF para. 22 states that policies should "look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities." No justification in the framework for identifying land for 15 years. Housing should be for the full plan period. 481 ha is allocated for employment over the plan period. Enough housing should be allocated to deliver the housing requirement over the plan period too to accord with soundness tests. Housing should also be identified across the whole plan period to ensure that the proposed Green Belt can benefit from the required permanence. 15 years identified risks a further Green Belt review in the plan period. The approach fails the consistent with national policy test.

Response:  
NPPF para. 67 notes that "Planning policies should identify a supply of: a) specific, deliverable sites for years one to five of the plan period; and b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan." The Local Plan does that. The years 2015 - 2018 are demonstrably covered by delivered sites in that period, and the years 2033 - 35 are demonstrably covered by sites that will deliver beyond 2033, and oversupply in settlements in the years 2018 - 33. Enough housing is being provided and identified to cover the 20 year period. This is covered in the Housing Topic Paper. The Green Belt approach is covered in the Green Belt Topic Paper.
2.17 The net annual housing requirement has not altered since the September 2018 informal consultation on Draft Policies and Proposed Sites, therefore comments made on behalf of SLG remain relevant and are repeated in part in this section. Firstly, though, it is worth considering the national policy basis for establishing housing targets. 2.18 Paragraph 60 of the NPPF provides the starting point for the assessment of housing targets. It is clear in noting that the standard methodology determines the "minimum number" of homes needed in an area - not the maximum. This paragraph is also clear that "an alternative approach" to calculating the minimum number of homes can only be used in "exceptional circumstances." That is, however, distinct from stating that exceptional circumstances are required to set a housing target above the standard method-produced minimum requirement - they are not. 2.19 In fact, national policy supports Councils pursuing higher housing targets than the minimum requirement produced by the standard method, especially where that is intended to stimulate economic growth or regeneration. Some of the relevant national policies follow. 2.20 NPPF paragraph 16 is very clear in noting that Development Plans should be prepared with the objective of contributing to the achievement of sustainable development and must be prepared positively, in a way that is aspirational but deliverable. 2.21 NPPF paragraph 72 notes that in seeking to identify land for the potential delivery of homes, particularly large-scale developments, Local Planning Authorities should ‘consider the opportunities presented by existing or planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains’. 2.22 NPPF paragraph 80 confirms that ‘planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development’. Paragraph: 010 Reference ID: 2a- 010-2010220 of the Planning Practice Guidance provides further detail on the use of the standard method and is worth quoting at length. It confirms that: ‘the Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: - growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals); - strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or - an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;’ 2.23 For the Local Plan to be sound, the economic growth strategy must be “deliverable over the plan period” - as per paragraph 35 (c) of the NPPF. If that growth strategy is deliverable, it is explicitly one of the circumstances in which the Council may seek to pursue a higher housing target. If the Council’s ‘strong ambitions for economic growth are to be realised, it is essential that a reflective housing target is pursued which in itself will create construction jobs, increase retail spending and thus employment and produce various other local economic spin off benefits, as well as providing a suitable supply, distribution and quality of homes to attract and retain workers, particularly for higher paid/skilled positions. The advent of the standard method does not change that. 2.24 Policy 3 requires at least 920 (net) new homes each year over the plan period and seeks to identify sufficient land to deliver at least 15 years supply. We have concerns with the quantum, the distribution and the reference to allocating sufficient land to deliver 15 years’ supply of housing, rather than the full plan period requirement. 2.25 The 920 per annum figure was originally calculated in the 2015 Housing Needs Assessment, and has been further justified by the Peter Brett Associates Economic Forecasts and Housing Needs Assessment, 2018 (PBA Report). 2.26 There remain a number of outstanding objections to the original 2015 Housing Needs Assessment with critics stating that the housing requirement is too low for reasons including of lack of adjustment to improve affordability, over reliance on bringing empty homes back into use and a poor record of delivery resulting in pent up demand. 2.27 The PBA Report 3 requires at least 920 (net) new homes each year over the plan period and seeks to identify sufficient land to deliver at least 15 years supply. We have concerns with the quantum, the distribution and the reference to allocating sufficient land to deliver 15 years’ supply of housing, rather than the full plan period requirement. 2.28 The 920 per annum figure was originally calculated in the 2015 Housing Needs Assessment, and has been further justified by the Peter Brett Associates Economic Forecasts and Housing Needs Assessment, 2018 (PBA Report). 2.29 Dismissing the 1,073 dpa requirement under the PBA Report at paragraph 4.37 states: “It is often asserted that the ‘future jobs’ uplift should be based on policy-led targets, and specifically on Strategic Economic Plans. In the case of Doncaster, we have estimated that this would increase housing need to 1,073 dpa. But in our view this is not the correct measure of objectively assessed need, because in line with the Framework and Guidance the OAN should be based on realistic expectation of future jobs rather than aspiration, and the Guidance specifies that the aspirations of Strategic Economic Plans should not be treated as part of the development plan.”
Local Plan which accord with the Sheffield City Region growth aspirations. That is contrary to the Framework which, at paragraph 81(a), states that planning policies should: “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.” 2.30 The Council’s approach identifies a range for housing requirements in the Main Urban Area and Main Towns with the lower of the range equating to the Local Housing Need identified using the Standard Method and the top of the range being the 920 figure identified in the 2015 Housing Needs Assessment. It is not considered justified to limit the growth to the top end of the range, when there is clear evidence of a higher jobs-led housing need of 1,073 dpa. Failing to plan to deliver that higher housing target means the economic strategy in the Local Plan - on its own terms - is not deliverable and is therefore not sound. Nor can the Plan be considered positively prepared. The policy should make it clear that the 920 dpa (or the alternative 1,073 dpa) is a minimum target. Nor is it considered appropriate to fix the lower end of the range to the Standard Method figure when the Council’s own evidence justifies an uplift. The Standard Method identifies a minimum housing need figure rather than an actual housing requirement figure. The minimum Standard Method has been applied to Service Towns and Larger Villages, without any uplift. We do not consider this a sound approach, the figure is too low and accounts for no uplift when the Council’s own evidence identifies it is appropriate to increase the requirement above that identified by the Standard Method. 2.31 Concerns with the Standard Method approach to identifying housing need have been well documented ever since the Government first proposed the approach in September 2017. Indeed the RTPI commented on the Standard Method when it was first proposed, stating that: “The government’s proposals for a new method to calculate local housing need would ‘entrench’ existing housebuilding patterns and does not consider employment projections or growth aspirations, the RTPI has said, to the agreement of several organisations.” 2.32 The Standard Method results in a clear north south divide in identifying housing need, with the south seeing significant increases in housing need and the north seeing the opposite, with significant reductions in identified housing need. This is as a result of the Standard Method being calculated based on past demographic trends. Going forward, the Standard Method dampens housing markets in the north, with its simplified methodology not allowing the past trends to be reversed. 2.33 As stated, the concerns with the Standard Method are well documented, not just in relation to the north south divide, but also due to the overall output of the Standard Method not reaching the Government’s target of 300,000 new homes a year. The Governments policy objective of reaching 300,000 homes a year remains. The Government in February 2019 committed to review the Standard Method over the next 18 months, therefore a new Standard Method could be in place by Summer 2020. 2.34 The PBA Report pointed out that the Council should review the housing requirement which was suggested prior to Government’s commitment to review the Standard Method. Policy 3 makes reference to the Standard Method being the housing requirement for the purposes of calculating the 5-year housing land supply, which will be reviewed and revised over the plan period. This therefore accounts for changes in the Standard Method. Policy 3 however does not make the same point in relation to the housing requirement.

Summary:
The standard methodology determines “minimum number” not a maximum (para. 60), with an alternative only being used in “exceptional circumstances”. This is distinct from stating that exceptional circumstances are required to set a housing target above the standard method-produced minimum requirement - they are not. National policy supports the council pursuing higher housing targets than the minimum produced by the standard method (para. 16; 72 & 80). For a plan to be sound, the economic strategy must be deliverable over the plan period (para. 35c of the NPPF). If that growth strategy is deliverable, it is explicitly one of the circumstances in which the Council may seek to pursue a higher housing target. If the Council’s ‘strong ambitions’ for economic growth are to be realised, it is essential that a reflective housing target is pursued which in itself will create construction jobs, increase retail spending and thus employment and produce various other local economic spin off benefits, as well as providing a suitable supply, distribution and quality of homes to attract and retain workers, particularly for higher paid/skilled positions. The standard method does not change that. Policy 3 requires at least 920 (net) new homes each year and seeks to identify sufficient land to deliver at least 15 years supply, Concerns about the quantum, distribution and lack of supply for the whole plan period. 920 stems from the 2015 HNA and was further justified by the PBA report. There are a number of objections to the 2015 HNA with criticism that the housing requirement is too low for reasons like lack of adjustments to improve affordability, over reliance on empty home re-use and poor delivery creating pent up demand. The plan period has now changed and a more up to date standard methodology figure is available. It would be expected that the PBA report is updated to align with the publication draft. Para. 4.37 of the PBA report dismisses the 1,073 figure. This undermines the growth focussed aspirations of the Local Plan which accord with the SCR. This is contrary to NPPF para. 81(a). It is not considered that limiting growth to the top of the range (920) is justified when there is evidence of a higher jobs led need of 1,073 dpa. Failing to deliver the higher housing target means the economic strategy, in its own terms, is not deliverable and is unsustainable. The plan cannot therefore be positively prepared. 920 or 1,073 should be the minimum and the plan should make that clear. Nor should the lower end be fixed to the standard method when the councils own evidence justifies an uplift. Not sound to apply the minimum number to the service towns and villages as it is far too low and accounts for no uplift despite the council’s evidence justifying the uplift. Concerns with the standard method are well documented, and the RTPI had objections and doubts: “The government’s proposals for a new method to calculate local housing need would ‘entrench’ existing housebuilding patterns and does not consider employment projections or growth aspirations, the RTPI has said, to the agreement of several organisations.” The method creates a north south divide and dampens northern housing markets. The Standard Method would also not allow the government target of 300,000 new homes to be met, and they have committed to reviewing the standard method, and so a new one could be in place by Summer 2020. The PBA Report pointed out that the Council should review the housing requirement which was suggested prior to Government’s commitment to review the Standard Method. Policy 3 makes reference to the Standard Method being the housing requirement for the purposes of calculating the 5-year housing land supply, which will be reviewed and revised over the plan period. This therefore accounts for changes in the Standard Method. Policy 3 does not make the same point in relation to the housing requirement.

Response:
The council is planning for 920dpa, which is 57% higher than the Standard Methodology figure. Although the 2015 HNA and 2018 PBA report result in the same figure, they were arrived at independently of each other and via different methods. The Peter Brett report superseded the housing requirement of the HNA, and the 2019 Housing Needs Assessment replaces other elements of this work. It is unnecessary to further update the Peter Brett Report, but the extended plan period has been factored in to housing calculations. The report clearly states the figure of 1,073 is related to the previous NPPF and not the revised NPPF, and 912dpa is correct as per the new NPPF (para. 5.27 & 5.28). These paragraphs also explain the Council could choose an intermediate number between 585 and 912, which the Council has elected not to do, in favour of retaining the higher figure. The NPPF instructs Council’s to use the Standard Methodology Figure (para. 60) to work out the minimum requirement. The Council has done this and has met the requirements on national policy.
### Tests of Soundness

<table>
<thead>
<tr>
<th>Policy:</th>
<th>Tests of Soundness</th>
<th>Reason: Underlying assumptions not tested.</th>
<th>Attend Hearing</th>
<th>Comments:</th>
</tr>
</thead>
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| Policy 3: Level & Distribution of Growth | Justified          | To allow participation in discussions regarding the settlement strategy, proposed housing requirement and distribution of development including site selection and allocations. | Attend Hearing | Need for Safeguarded Land, the background paper states at paragraph 3.3.10 that: "Whilst currently in its relative infancy, if the ambitions for the airport are realised, the adjacent settlement of Auckley - Hayfield Green, which is a Service Town and Village and has a modest housing target of 125 dwellings in the current local plan, may in future be viewed as a more sustainable location for growth in an area unconstrained by both Green Belt and flood risk."

### Summary:

No economic uplift is attributed to the Service Towns and Villages. This fails the justified soundness test as the Council have not considered an appropriate alternative. This means no additional housing is allowed in Service Towns and larger villages, for example those well located to Doncaster Sheffield Airport - a key driver of economic growth in the borough. Auckley is close and has no constraints. The airport will create an aerotropolis which could create 73,000 new jobs for the Sheffield City Region, which could create 73,000 new jobs for the Sheffield City Region. A new railway station is also proposed a few minutes from Auckley. Whilst it is acknowledged that the Local Plan includes a specific Airport Policy (Policy 7) it seems logical to include an element of economic uplift to Auckley, which the existing proposed distribution strategy does not allow for. This is a flaw in the settlement hierarchy which restricts the distribution of housing. Flexibility is required to allow for economic uplift not to be restricted just to the Main Urban Area and Main Towns. 2.53 The Local Plan clearly recognises the importance of the Airport in the Local Plan. The airport is a main driver for growth in the Borough and indeed the Local Plan includes a strategic policy specifically related to the Airport and Business Park (Policy 7) to assist in the achievement of its expansion goals. According to Policy 4 (Employment Allocations), of the 365 ha of overall employment land (excluding land developed between 2015 - 2018) some 23% (84.7ha) is located at the Airport. Of the identified employment allocations in the Local Plan (Table 4) 34.1% of the land available for employment use is at the Airport, and 41.8% of the employment land to be developed in the plan period is at the Airport. 2.54 Given the Airport's clear influence on the economic growth of the Borough, there is a strong and logical case for additional dwellings to be directed to this part of the Borough to support that growth. Whilst it is recognised that Policy 7 includes the provision of an additional Airport Reserve Housing Site there are suitable, sustainable sites in close proximity to the Airport that are unconstrained by Green Belt or Flood Risk that could be allocated for housing to align with the economic growth focus in this part of the Borough. The spatial distribution of the housing requirement should account for the Airport's influence and the proximity of unconstrained available development sites to the Airport. This alternative option has not been considered by the Council. 2.55 The justifiable need to identify additional land close to the Airport to align with the Airport's growth, coupled with the appropriate consideration of Auckley as a standalone Larger Village within the Service Towns and Larger Villages settlement hierarchy tier makes a strong case for the allocation of land in Auckley above even that required to meet local need. 2.56 The Green Belt Background Paper recognises the potential for Auckley - Hayfield Green as a sustainable location for growth. In the context of justifying no need for Safeguarded Land, the background paper states at paragraph 3.3.10 that: "Whilst currently in its relative infancy, if the ambitions for the airport are realised, the adjacent settlement of Auckley - Hayfield Green, which is a Service Town and Village and has a modest housing target of 125 dwellings in the current local plan, may in future be viewed as a more sustainable location for growth in an area unconstrained by both Green Belt and flood risk."
Response:
The approach has been consulted on and the position is further explained in the Housing Topic Paper. The outcome of consultation was that people did not feel employment had to be located adjacent to housing if it was still accessible. Auckley - Hayfield Green are defined as one settlement which reflects the Parish and Neighbourhood Plan boundary. With regards to the settlement specifically, the actual amount of housing that will be delivered there due to commitments, and the potential additional housing as per Policy 7 within the plan period is 255 units (130 above its allocation), with 280 additional units at site 940 (535 total), plus the potential for a further 920 units linked to the delivery of jobs (factoring in share for the aforementioned 280). This is 1,455 potential units in total, which would be on the levels of a Main Town were the settlement to qualify as a Main Town, which it does not as per the methodology.
Table 5 summary of housing requirements presented on Page 44 indicates that 920 new residential properties are required to be built in Doncaster per annum between 2015 and 2035 giving a total requirement of new homes to be built between 2018 and 2033 of 13235 homes. Based on the assumption of 3 persons/residence this means an anticipated growth in the Doncaster population between 2018 and 2033 of 39705. The Doncaster State of the Borough report produced by DMBC indicates the population of Doncaster in 2018 is 308,940 therefore based on the assumed additional housing required in the proposed Plan the population of Doncaster is set to increase by 12.85% by 2033. The DMBC State of the Borough Report states the population of Doncaster has increased by 2.5% between 2010 and 2018 and is predicted to increase by a further 2.7% between 2019 and 2041. Based on this population increase the population of Doncaster will increase to 317281 an increase of 8341 persons over a 22 year period. Assuming 3 people per property only 2780 additional properties are required between 2019 and 2041 to accommodate the increased population. This is substantially lower than the 13325 homes the Local Plan indicates are required between 2018 and 2033. In my experience there is currently no shortage of properties in Doncaster for people to buy or rent (both private and council). I have several work colleagues who have obtained council rental property within 6 months of application. The above indicate to myself that the increase in residential properties in Doncaster proposed by the plan is neither justified or effective. With regard to plots 165 and 186 at Crabgate Lane, Skellow I would comment as follows. - Current population of Skellow and Carcroft is approximately 9000. The Local plan indicates than an additional 250 residential properties are required in this Service Town/Village tier by 2033. Assuming an occupation rate of 3 persons/property this indicates the population of Skellow and Carcroft will increase by 750 by 2033 which is an 8.3% increase. This is significantly greater than the 2.7% in the DMBC 2018 State of the Borough report. - A 2.7% increases by 2041 represent an increase in the population of Skellow and Carcroft by 2041 of 243 persons. Making an adjustment or the population increase to 2033, say reduce by 7/22 (that is 7 years) the population increase by 2033 is likely to be 166 persons. Assuming 3 persons/residence then only an additional 55 houses are required in Skellow and Carcroft by 2033 of which 7 already have planning permission see Table H1m page 241. The proposal to build an additional 300 houses on plots 165 and 186 therefore cannot be justified and is an ineffective use of green belt land. The effect of 300 additional houses on the existing traffic, education, medical and community systems/facilities in the Skellow and Carcroft area have not been considered in the report, some vague reference is made to the developer contributing to the additional educational facilities required. In the current climate of concerns about global warming and concerns over food supplies following Brexit the taking of green belt agricultural land for large scale development cannot be justified and is an ineffective use of land. Surely 55 properties i estimate that will be required between 2015 and 2033 are better provided by small infill developments in batches of say 10 properties the construction of which will have minimal detrimental effect on adjacent neighbourhoods. The flood risk on other areas has also been overemphasised in the report. Buildings can be designed and constructed to take account of flood risk and small developments can be sited in areas away from high flood risk areas. It appears that the development areas have been selected to provide large areas of green belt land which will be attractive to developers and have minimal construction issues to maximise profit. Surely in these days of environmental concern and loss of habitat for wildlife this cannot be justified. Development of agricultural land also increases flood risk which with concerns over more extreme weather events due to global warming cannot be justified. When the Development Plan was developed by DMBC it seems to have been based on incorrect population increase data. It seems to have been produced using an assumption that people will be attracted to live in Doncaster from outside the area. This may be true for some areas such as the south side of Doncaster where the housing quality and general environment is if a higher standard however this in unlikely to be the case for the old pit villages around Doncaster, these are generally the Service towns and villages referred to in the Development Plan. These areas tend to be unattractive to people wishing to move into the DMBC area especially people of higher earning potential. People living in Skellow and Carcroft currently and in the future are likely to remain as people who are born and bred in the area with little increase from outside DMBC. The Development Plan assessment of 250 new properties in Skellow and Carcroft by 2033 is therefore not justified and an ineffective use of green belt land in the area. Based on the assumption of 3 people per house, 13,235 new homes over the plan period equates to population growth of 39,705 people, or an increase of 12.8% from the 308,940 residents which are reported in the 2018 State of the Borough report. The State of the Borough report actually states population will only increase by 2.7% to 2041, to 317,281 and therefore an increase of 8341 people over 22 years. Assuming 3 people per property, only 2,780 dwellings are therefore needed to accommodate the population - far lower than 13,235. Do not believe there is a shortage of properties in Doncaster to buy or rent, knows of people who have obtained council properties quickly. Regarding Site 165 / 186 specifically: applying the logic of 3 people per property, the 250 homes proposed equates to 750 people, or an 8.3% increase in the population of Carcroft - Skellow - significantly greater than the State of the Borough report (2.7%). 2.7% by 2041 is 243 persons. Making an adjustment to 2033 (7 / 22 or a reduction of 7 years) shows population increase would only be 166 people, and again if applying the 3 people per house rule then only 55 dwellings are needed, of which 7 already have permission. Proposals are not an effective use of Green Belt and unjustified. Will result in impacts on traffic congestion, schools, doctors and community facilities in the area. These are not considered and developer contributions are vague. With global warming and brexit a concern, agricultural land should not be lost and the loss is not justified. 55 units would be better delivered on small infill developments of approx 10 units each. Flood risk in other areas has been overemphasised in the report. Buildings can be
developed such land increases flood risk, which is also increased by global warming. The plan assumes that people will be attracted from outside Doncaster to live in Doncaster. This may be true in the south of the borough but is unlikely in old pit villages, especially to people with higher earning potential. People in Carcroft - Skellow are likely to remain as people who have always lived there. The site and the level of new housing proposed is therefore not justified.

Response:
The number of houses required to match and meet the requirements of the Borough’s population has been calculated and explained in the Peter Brett’s Report. As Carcroft will only deliver to meet it’s local need, it’s share of the baseline / local needs (that which would happen without policy intervention / an economic uplift) is all that is allocated here (250 dwellings over the plan period). A suitable site has been found which is not in the flood zone (as much land is in Carcroft), and which has been assessed in the Green Belt Review as having a moderately strong case for removal from the Green Belt, which also meets the settlements housing requirements. In this case, it is felt the incursion into the Green Belt is therefore justified by exceptional circumstances, as set out in the Green Belt Topic Paper.

<table>
<thead>
<tr>
<th>CUSREF: 04706</th>
<th>Name: Savills</th>
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<tr>
<td>Date: 27/09/2019</td>
<td>Organisation: Savills</td>
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<tr>
<td>Representing: Warde-Aldam Estates</td>
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| Comment Ref: C/Policy 3/04706/1/002 |
| Attend Examination: Attend Hearing |
| Reason: We wish to discuss with the Inspector and Council our concerns regarding the Open Space allocation at Warmsworth. There is detailed evidence which will need to be discussed orally. |
| Area: Chapter 4: Strategic Approach |
| Policy: Policy 3: Level & Distribution of Growth |

| Tests of Soundness: | Positively prepared | Effective |
| Justified | Consistent with national |

| Comment: |
| At least 481 hectares of employment land and at least 920 (net) new homes each year are proposed over the plan period 2015-2035. That equates to 18,400 homes in total over the 20 year plan period. It is key that there is flexibility built into the Plan with regard to housing numbers and future development opportunities. This is to ensure that housing need and demand is met throughout the Plan period. It is therefore vital that the proposed housing figure is a minimum figure, rather than viewed as a cap and a restriction to new development. As required by the NPPF, the emerging Local Plan must define the overall level of growth over the Plan period (up to 2035), based on the requirement to meet the Borough’s objectively assessed needs (OAN). Determining the OAN for housing is usually assisted by the Strategic Housing Market Assessment (SHMA). We support the approach proposed by the Council to meet at least 920 dwellings per annum due to the fact that, as highlighted by the Home Builders Federation, the standard method could have implications for housing targets in some areas of the country (principally in the north of England), where economic growth strategies may not be supported by local authorities that plan for the minimum number of additional dwellings as indicated by the standard methodology. By only using the proposed methodology it could lead to the Borough not planning enough homes to support the economic growth strategy. If the Council does not seek to meet the most appropriate level of development needed it is considered that the Borough would suffer significantly from out-migration, reduced / limited employment opportunities and have a detrimental impact on the existing supply of local services and facilities. This goes against the strategic Vision, Strategy and Objectives of the Plan and would therefore be unsound as the plan would not have been planned positively. We therefore support the proposed level of growth of the Borough over the Plan period. |

| Summary: |
| It is key that there is flexibility built into the Plan with regard to housing numbers and future development opportunities. It is therefore vital that the proposed housing figure is a minimum figure. Support the approach proposed by the Council to meet at least 920 dwellings per annum due to the fact that, as highlighted by the Home Builders Federation, the standard method could have implications for housing targets in some areas of the country (principally in the north of England), where economic growth strategies may not be supported by local authorities that plan for the minimum number of additional dwellings as indicated by the standard methodology. By only using the proposed methodology it could lead to the Borough not planning enough homes to support the economic growth strategy. |

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- Justified
- Effective
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Policy 3: Level & Distribution of Growth

2.16 The Council set out within the Housing Need Assessment that they have a programme in place which includes a team of dedicated officers focused on tackling empty homes and preventing homes becoming empty. They aim to bring these homes back into use and as a result of this the housing requirement should be reduced to reflect this. We would question the validity of this approach and given the uncertainty which surrounds the compulsory purchase of property, this shouldn’t lead to the reduction in the housing requirement. 2.17 Policy 3 explains that, using the Government’s Standard Housing Methodology as a starting point, national projections identify a housing need in the Borough for 585 homes per year (baseline growth) over the plan period (8,775 homes). In addition, to meet planned economic growth over the plan period, an additional 327 homes per year (economic growth) is identified. This gives a total objectively assessed housing need (OAHN) of 912 new homes (net) per year for the Borough once economic growth is taken into account. 2.18 Table 3 at paragraph 4.39 of the Publication Local Plan, sets out the Settlement Hierarchy and Distribution of Proposed Housing. Paragraph 4.40 explains that Local need (baseline) housing growth (approximately 8,775 homes) is distributed pro-rata to all settlements with a ‘service function’ to meet locally the housing growth needs of the existing population. The balance of the local need figure (that which relates to villages without a service function) is 632. That figure has then been added to the economic-led housing growth element for distribution to higher order settlements in the Borough rather than spread pro-rata. Our Client’s concern is that those villages that don’t have 4 or more of the 12 key services will lose out on any form of housing allocation and as a result they will stagnate over the plan period. 2.19 For example the balance of the number of dwellings that would otherwise have been allocated to these villages that don’t have a service function is proposed to be added to the economic-led housing allocation i.e. the main urban areas and 7 main towns. Our Client objects to this approach as it may require Green Belt release in settlements such as Bawtry. This figure should be distributed evenly across all levels of the settlement hierarchy. In Bawtry for example this would result in an allocation of 215 houses as opposed to the 110 listed in Policy 3. 2.20 Our Client objects to this approach which further limits the housing allocation to smaller settlements. 2.21 Our Client has serious concerns and objects to the way in which the five year housing land supply has been calculated in that it ignores the need to meet planned economic growth over the plan period as identified through the Housing Needs Assessment; there is nothing in planning policy that advocates that approach. 2.22 In summary, Policy 3 is unsound and does not meet the tests of soundness set out in paragraph 35 of the Revised Framework. The policy is not justified, effective or positively planned and should be revised.

Summary:
Policy 3 - Level and Distribution of Growth 1. Objects to reducing the housing figure by including programme to bring empty homes back into use. Question validity of this approach - this should not lead to a reduction in the housing requirement. 2. Objects to distribution of housing. Should be more evenly spread. Concerned that some villages will stagnate without a housing allocation. 3. 5 year land supply - objects to method of calculation. It ignores the need to meet planned economic growth as identified in the Housing Needs Assessment; there is nothing in planning policy that advocates that approach. 4. Policy 3 is not compliant with NPPF para 35 therefore is not justified, effective or positively planned.

Response:
See Response to Representations comments to Policy 2. PPG supports the principle of being able to set the requirement as a range. NPPF is clear that Planning decisions should be taken following a plan-led approach. The Council could have just adopted the standard methodology figure as the Local Plan housing requirement in the first instance but have resisted such an approach and instead are planning for a very significant uplift for our ambitions for growth and this is reflected in the scale of allocations proposed. That said, the vast majority of this ambition needs to be delivered by the development industry and the market which may struggle to continue to meet such a high target. The Council has relatively little role to play post Planning decisions being granted in terms of actual housing delivery. Losing control of 5YHLS in this context therefore undermines the key policy objective of having a plan-led approach rather than the presumption that would be applied if 5YHLS cannot be demonstrated.
2.15 Our Client has serious concerns regarding the Council’s methodology which has been used to calculate the housing target of 920 dwellings per annum over the plan period 2015 - 2035. 2.16 The Council set out within the Housing Need Assessment that they have a programme in place which includes a team of dedicated officers focussed on tackling empty homes and preventing homes becoming empty. They aim to bring these homes back into use and as a result of this the housing requirement should be reduced to reflect this. We would question the validity of this approach and given the uncertainty which surrounds the compulsory purchase of property, this shouldn’t lead to the reduction in the housing requirement. 2.17 Policy 3 explains that, using the Government’s Standard Housing Methodology as a starting point, national projections identify a housing need in the Borough for 585 homes per year (baseline growth) over the plan period (8,775 homes). In addition, to meet planned economic growth over the plan period, an additional 327 homes per year (economic growth) is identified. This gives a total objectively assessed housing need (OAHN) of 912 new homes (net) per year for the Borough once economic growth is taken into account. 2.18 Table 3 at paragraph 4.39 of the Publication Local Plan, sets out the Settlement Hierarchy and Distribution of Proposed Housing. Paragraph 4.40 explains that Local need (baseline) housing growth (approximately 8,775 homes) is distributed pro-rata to all settlements with a ‘service function’ to meet locally the housing growth needs of the existing population. The balance of the local need figure (that which relates to villages without a service function) is 632. That figure has then been added to the economic-led housing growth element for distribution to higher order settlements in the Borough rather than spread pro-rata. Our Client’s concern is that those villages that don’t have 4 or more of the 12 key services will lose out on any form of housing allocation and as a result they will stagnate over the plan period. 2.19 For example the balance of the number of dwellings that would otherwise have been allocated to these villages that don’t have a service function is proposed to be added to the economic-led housing allocation i.e. the main urban areas and 7 main towns. Our Client objects to this approach as it may require Green Belt release in settlements such as Bawtry. This figure should be distributed evenly across all levels of the settlement hierarchy. In Bawtry for example this would result in an allocation of 215 houses as opposed to the 110 listed in Policy 3. 2.20 Our Client objects to this approach which further limits the housing allocation to smaller settlements. 2.21 Our Client has serious concerns and objects to the way in which the five year housing land supply has been calculated in that it ignores the need to meet planned economic growth over the plan period as identified through the Housing Needs Assessment; there is nothing in planning policy that advocates that approach. 2.22 In summary, Policy 3 is unsound and does not meet the tests of soundness set out in paragraph 35 of the Revised Framework. The policy is not justified, effective or positively planned and should be revised.  

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Housing

Concerns with the overall requirement:

2.9 The net annual housing requirement has not altered since the September 2018 informal consultation on Draft Policies and Proposed Sites, therefore comments made on behalf of Mr and Mrs Hall remain relevant and are repeated in part in this section. 2.10 Policy 3 requires that at least 920 (net) new homes each year over the plan period and seeks to identify sufficient land to deliver at least 15 years' supply of housing, rather than the full plan period requirement. 2.11 The 920 per annum figure was originally calculated in the 2015 Housing Needs Assessment, and has been further justified by the Peter Brett Associates Economic Forecasts and Housing Needs Assessment, 2018 (PBA Report). 2.12 There remain a number of outstanding objections to the original 2015 Housing Needs Assessment with criticisms stating that the housing requirement is too low for reasons including of lack of adjustment to improve affordability, over reliance on bringing empty homes back into use and a poor record of delivery resulting in pent up demand. 2.13 The PBA Report findings conclude the need for an additional requirement of 912 dwellings per annum (dpa) based on the baseline projection in the Government's Standard Method plus an economic uplift of 1% driven by the job-led scenario in alignment with the Sheffield City Region. The economic uplift is applied for the 2016 - 2026 assessment period used in the Standard Method. Should the economic uplift be applied to the plan period (2015 - 2032) the requirement increases to 1,073 dpa. The PBA Report has not been updated since the previous Draft Policies and Proposed Sites consultation. The plan period has changed and a more up to date Standard Method figure is available. It would be expected that the PBA Report is updated to align with the Publication Draft. The Settlement Background Paper explains that the 920 dpa is retained in the Local Plan given that the 912 dpa figure in the PBA Report only differed from the original housing requirement figure by 8 dwellings per annum. 2.14 In justifying the 912 dpa requirement rather than the 1,073 figure the PBA Report at paragraph 4.37 states: "It is often asserted that the 'future jobs' uplift should be based on policy-led targets, and specifically on Strategic Economic Plans. In the case of Doncaster, we have estimated that this would increase housing need to 1,073 dpa. But in our view this is not the correct measure of objectively assessed need, because in line with the Framework and Guidance the OAN should be based on realistic expectation of future jobs rather than aspiration, and the Guidance specifies that the aspirations of Strategic Economic Plans should not be treated as part of the development plan." 2.15 Dismissing the 1,073 dpa figure undermines the growth focussed aspirations of the Local Plan which accord with the Sheffield City Region growth aspirations. That is contrary to the Framework which, at paragraph 81(a), states that planning policies should: "set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration."

2.16 The Council's approach identifies a range of housing requirements in the Main Urban Area and Main Towns with the lower of the range equating to the Local Housing Need identified using the Standard Method and the top of the range being the 920 figure identified in the 2015 Housing Needs Assessment. It is not considered justified to limit the growth to the top end of the range, when there is clear evidence of a higher jobs-led housing need of 1,073 dpa. The policy should make it clear that the 920 dpa (or the alternative 1,073 dpa) is a minimum target. Nor is it considered appropriate to fix the lower end of the range to the Standard Method figure when the Council's own evidence justifies an uplift. The Standard Method identifies a minimum housing need figure rather than an actual housing requirement figure. The minimum Standard Method has been applied to Service Towns and Larger Villages, without any uplift. We do not consider this is a sound approach, the figure is too low and accounts for no uplift when the Council's own evidence identifies it is appropriate to increase the requirement above that identified by the Standard Method. 2.17 Concerns with the Standard Method approach to identifying housing need have been well documented ever since the Government first proposed the approach in September 2017. Indeed the RTPI commented on the Standard Method when it was first proposed, stating that: "The Government's proposals for a new method to calculate local housing need would 'entrench' existing housebuilding patterns and does not consider employment projections or growth aspirations, the RTPI has said, to the agreement of several organisations." 2.18 The Standard Method results in a clear north south divide in identifying housing need, with the south seeing significant increases in housing need and the north seeing the opposite, with significant reductions in identified housing need. This is as a result of the Standard Method being calculated based on past demographic trends. Going forward, the Standard Method dampens housing markets in the north, with its simplified methodology not allowing the past trends to be reversed. 2.19 As stated, the concerns with the Standard Method are well documented, not just in relation to the north south divide, but also due to the overall output of the Standard Method not reaching the Government's target of 300,000 new homes a year. The Governments policy objective of reaching 300,000 homes a year remains. The Government in February 2019 committed to review the Standard Method over the next 18 months, therefore a new Standard Method could be in place by Summer 2020. 2.20 The PBA Report pointed out that the Council should review the housing requirement which was suggested prior to Governments commitment to review the Standard Method. Policy 3 makes reference to the Standard Method being the housing requirement for the purposes of calculating the 5-year housing land supply, which will be reviewed and revised over the plan period. This therefore accounts for changes in the Standard Method. Policy 3 however does not make the same point in relation to the housing requirement. Identify land sufficient to deliver at least 15 years' supply: 2.21 We object to Policy 3 only seeking to identify sufficient land to deliver 15 years' supply of housing, when the plan period covers 20 years (2015 - 2035). Paragraph 22 of the Framework (2019) states that strategic policies: "should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities." (our emphasis) 2.22 There is no justification in the Framework for...
identifying land for only 15 years. Identifying housing for the full plan period would be in accordance with the Framework. Furthermore, Policy 3 seeks to facilitate the delivery of at least 481 hectares of employment land over the plan period, therefore the Local Plan should equally identify land to meet the housing requirement over the plan period. Policy 3 should seek to identify homes sufficient to deliver the housing requirement for the whole plan period, which would accord with all the soundness tests in the Framework. 2.23 Paragraph 136 of the Framework is clear that where there is a need for Green Belt changes regard should be had for the intended permanence in the long term, so they can endure beyond the plan period. If the authority is seeking Green Belt release in the Local Plan. Allocation of housing land for the full plan period should be identified to ensure that any proposed Green Belt can benefit from the required degree of permanence. Identifying only 15 years’ worth of land risks a further Green Belt review ahead of the end of the plan period. 2.24 It is considered that this approach fails the "consistent with national policy" soundness test. Distribution of Housing: 2.25 We have a number of concerns regarding the distribution of the housing requirement set out in Draft Policy 3. The Settlement Background Paper 2018 was prepared in support of the previous informal Local Plan consultation and explains the distribution. It is however disappointing that an updated Topic Paper is not available until Plan Submission, which will explain "the distribution of housing to individual settlements and the issues relevant to each further, such as the influence of existing planning permission reducing the need for new allocations or impacts or impacts on constraints such as flood risk." This information should be available at Publication stage. 2.26 The Settlement Background Paper explains that the baseline housing requirement (minimum Standard Method) is distributed across the settlements based on their percentage of the Borough’s households. Aside from our objections to the lack of uplift above the Standard Method to the Service Towns and Larger Villages we maintain our disagreement with this rather simplistic distribution method which does not factor in the sustainability of a settlement; or the ability of a settlement to deliver their minimum requirement quota. This distribution does not account for recent growth in an area which will then result in proportionately higher growth in the plan period, and disadvantages settlements that may not have grown in the past. 2.27 Sprotbrough is a sustainable settlement within the Service Towns and Larger Villages tier of the settlement hierarchy, containing 3 out of 5 of the Primary Services outlined in the Settlement Audit (a Primary School, GP, and Pharmacy). The sustainability of the village is assisted by its close proximity to the Doncaster Main Urban Area. It is considered the housing requirement in Policy 3 of 95 dwellings in Sprotbrough is not proportionate to its sustainability status. Given the close relationship of Sprotbrough to the Main Urban Area it is considered that an alternative approach is justified, to allow an additional housing requirement above the baseline minimum in Sprotbrough. Local Plan Distribution V Actual Distribution: 2.28 The identified allocated sites in the Local Plan (Chapter 16) do not align with the proposed distribution of the housing requirement as outlined in Policy 3. Table 1 below highlights a number of settlements where the allocations fall outside the proposed requirement ranges and service town and villages requirements. Settlement Hierarchy Tier In Local Plan: Doncaster Main Urban Area: Constituent Towns: Contiguous built up area of Doncaster Town Local Plan Targets - No: 6805 - 7315 Local Plan Targets - %: Local Plan Allocations - No: 7441 Local Plan Allocations - %: TOTAL Local Plan Targets - No: Local Plan Targets - %:"At least 50%" Local Plan Allocations - No: 7441 Local Plan Allocations - %: 46.2% Settlement Hierarchy Tier In Local Plan: Main Towns Constituent Towns: Adwick - Woodlands Local Plan Targets - No: 255-765 Local Plan Targets - %: Local Plan Allocations - No: 482 Local Plan Allocations - %: Constituent Towns: Armthorpe Local Plan Targets - No: 420-990 Local Plan Targets - %: Local Plan Allocations - No: 1049 Local Plan Allocations - %: Constituent Towns: Conisborough & Denby Local Plan Targets - No: 465-975 Local Plan Targets - %: Local Plan Allocations - No: 528 Local Plan Allocations - %: Constituent Towns: Dunsforth, Dunsville, Hatfield & Stainforth Local Plan Targets - No: 575-1805 Local Plan Targets - %: Local Plan Allocations - No: 1968 Local Plan Allocations - %: Constituent Towns: Mexborough Local Plan Targets - No: 475-985 Local Plan Targets - %: Local Plan Allocations - No: 310 Local Plan Allocations - %: Constituent Towns: Rossington Local Plan Targets - No: 285-895 Local Plan Targets - %: Local Plan Allocations - No: 1219 Local Plan Allocations - %: Constituent Towns: Thorne & Moorends Local Plan Targets - No: 510-1020 Local Plan Targets - %: Local Plan Allocations - No: 736 Local Plan Allocations - %: TOTAL Local Plan Targets - No: Local Plan Targets - %:"About 40%" Local Plan Allocations - No: 6292 Local Plan Allocations - %: 39.0% Settlement Hierarchy Tier In Local Plan: Service Towns and Villages Constituent Towns: Askern Local Plan Targets - No: 165 Local Plan Targets - %: Local Plan Allocations - No: 691 Local Plan Allocations - %: Constituent Towns: Auckley - Hayfield Green Local Plan Targets - No: 125 Local Plan Targets - %: Local Plan Allocations - No: 255 Local Plan Allocations - %: Constituent Towns: Barnburgh - Harlington Local Plan Targets - No: 60 Local Plan Targets - %: Local Plan Allocations - No: 66 Local Plan Allocations - %: Constituent Towns: Barnby Dun Local Plan Targets - No: 105 Local Plan Targets - %: Local Plan Allocations - No: 104 Local Plan Allocations - %: Constituent Towns: Bawtry Local Plan Targets - No: 110 Local Plan Targets - %: Local Plan Allocations - No: 90 Local Plan Allocations - %: Constituent Towns: Carcroft - Skellow Local Plan Targets - No: 250 Local Plan Targets - %: Local Plan Allocations - No: 307 Local Plan Allocations - %: Constituent Towns: Edlington Local Plan Targets - No: 230 Local Plan Targets - %: Local Plan Allocations - No: 665 Local Plan Allocations - %: Constituent Towns: Finningley Local Plan Targets - No: 55 Local Plan Targets - %: Local Plan Allocations - No: 50 Local Plan Allocations - %: Constituent Towns: Sprotbrough Local Plan Targets - No: 95 Local Plan Targets - %: Local Plan Allocations - No: 80 Local Plan Allocations - %: Constituent Towns: Tickhill Local Plan Targets - No: 165 Local Plan Targets - %: Local Plan Allocations - No: 74 Local Plan Allocations - %: TOTAL Constituent Towns: Local Plan Targets - No: Local Plan Targets - %:"About 10%" Local Plan Allocations - No: 2382 Local Plan Allocations - %: Table 1: Comparison of Publication Local Plan Housing Targets (Policy 3) and actual allocations in the Publication Draft. 2.29 The overall percentages of proposed allocations are broadly in alignment with the target (50% to Main Urban Area, 40% to Main Towns, and 10% to Service Towns and Villages). While the Service Towns and Villages proposed allocations are above the target 10%, the three Service Towns and Villages of Askern, Edlington, and Carcroft-Skellow account for 70% of the proposed allocations in this tier of the hierarchy. These three settlements were previously either Principal Towns or Renewal Towns in the Core Strategy with significant proportions of housing growth. These three settlements receive allocations higher than the proposed Local Plan target (significantly so for the case of Askern and Edlington). The over provision in these Service Towns and Larger Villages is directed to former Core Strategy higher order settlements that were expected to take a lot of growth. In relation to the proportion of development the Local Plan allocation distribution is not too dissimilar to the Core Strategy distribution.

Summary:
Policy 3 requires at least 920 (net) new homes each year and seeks to identify sufficient land to deliver at least 15 years supply. Concerns about the quantum, distribution and lack of supply for the whole plan period. 920 stems from the 2015 HNA and was further justified by the PBA report. There are a number of objections to the 2015 HNA with criticism that the housing requirement is too low for reasons like lack of adjustments to improve affordability, over reliance on empty home re-use and poor delivery creating pent up demand. The plan period has now changed and a more up to date standard methodology figure is available. It would be expected that the PBA report is updated to align with the publication draft. Para. 4.37 of the PBA report dismisses the 1,073 figure. This undermines the growth focussed aspirations of the Local Plan which accord with the SCR. This is contrary to NPPF para. 81 (a). It is not considered that limiting growth to the top of the range (920) is justified when there is evidence of a higher jobs led need of 1,073dpa. Failing to deliver the higher housing target means the economic strategy, in its own terms, is not deliverable and is unsound. The plan cannot therefore be positively prepared. 920 or 1,073 should be the minimum and the plan should make that clear. Nor should the lower end be fixed to the standard method when the councils own evidence justifies an uplift. Not sound to apply the minimum number to the service towns and villages as it is far too low and accounts for no uplift despite the council’s evidence
justifying the uplift. Concerns with the standard method are well documented, and the RTPI had objections and doubts: "The government’s proposals for a new method to calculate local housing need would ‘entrench’ existing housebuilding patterns and does not consider employment projections or growth aspirations, the RTPI has said, to the agreement of several organisations." The method creates a north south divide and dampens northern housing markets. The Standard Method would also not allow the government target of 300,000 new homes to be met, and they have committed to reviewing the standard method, and so a new one could be in place by Summer 2020. The PBA Report pointed out that the Council should review the housing requirement which was suggested prior to Government’s commitment to review the Standard Method. Policy 3 makes reference to the Standard Method being the housing requirement for the purposes of calculating the 5-year housing land supply, which will be reviewed and revised over the plan period. This therefore accounts for changes in the Standard Method. Policy 3 does not make the same point in relation to the housing requirement. Object to only 15 years worth of housing land being identified when the plan lasts 20 years.

PPF para. 22 states that policies should "look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities." No justification in the framework for identifying land for 15 years. Housing should be for the full plan period. 481 ha is allocated for employment over the plan period. Enough housing should be allocated to deliver the housing requirement over the plan period too to accord with soundness tests. Housing should also be identified across the whole plan period to ensure that the proposed Green Belt can benefit from the required permanence. 15 years identified risks a further Green Belt review in the plan period. The approach fails the consistent with national policy test. Issues with the distribution of housing in Policy 3. The 2018 Settlement Background Paper was prepared in support of the previous informal consultation. It is disappointing that the updated paper will not be available until plan submission. This should be available now. Notwithstanding objections about the level of uplift, it is maintained that the distribution is rather simplistic and fails to factor in the sustainability of a settlement or the ability of a settlement to deliver the minimum requirement quota. This does not account for recent growth in an area which will then result in a proportionately higher growth in the plan period, and disadvantages settlements that may not have grown in the past. The distribution aligns with 50% MUA; 40% Main Towns and 10% Service Towns. However, in the Service Towns, Askern, Edlington and Carcroft - Skellow account for 70% of proposed allocations in this tier of the hierarchy. These were all previously principal or renewal towns in the Core Strategy with significant growth directed to them. These three receive allocations much higher than the sustainability of a settlement or the ability of a settlement to deliver the minimum requirement quota. This does not account for recent growth in an area which will then result in a proportionately higher growth in the plan period, and disadvantages settlements that may not have grown in the past. The distribution aligns with 50% MUA; 40% Main Towns and 10% Service Towns. However, in the Service Towns, Askern, Edlington and Carcroft - Skellow account for 70% of proposed allocations in this tier of the hierarchy. These were all previously principal or renewal towns in the Core Strategy with significant growth directed to them. These three receive allocations much higher than

Response:

The council is planning for 920dpa, which is 57% higher than the Standard Methodology figure. Although the 2015 HNA and 2018 PBA report result in the same figure, they were arrived at independently of each other and via different methods. The Peter Brett’s work supersedes the housing requirement of the HNA, and the 2019 Housing Needs Assessment replaces other elements of this work. It is unnecessary to further update the Peter Brett Report, but the extended plan period has been factored in to housing calculations. The report clearly states the figure of 1,073 is related to the previous NPPF and not the revised NPPF, and 912dpa is correct as per the new NPPF (para. 5.27 & 5.28). These paragraphs also explain the Council could choose an intermediate number between 585 and 912, which the Council has elected not to do, in favour of retaining the higher figure. The NPPF instructs Council’s to use the Standard Methodology Figure (para. 60) to work out the minimum requirement. The Council has done this. Using a range is covered in Planning Practice Guidance (Housing Supply and Delivery - Paragraph: 027 Reference ID: 68-027-20190722). NPPF para. 67 notes that "Planning policies should identify a supply of: a) specific, deliverable sites for years one to five of the plan period; and b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan." The Local Plan does that. The years 2015 - 2018 are demonstrably covered by delivered sites in that period, and the years 2033 - 35 are demonstrably covered by sites that will deliver beyond 2033, and oversupply in settlements in the years 2018 - 33. Enough housing is being provided to cover the 20 year period. This is covered in the Housing Topic Paper. The settlements mentioned are the largest and most sustainable of the Service Towns and therefore have a larger allocation. Due to commitments they are able to deliver 70% of the overall amount of housing that will be delivered in this tier, but this does not prejudice other areas delivering their housing requirement, nor does it offset the requirement of other areas. By applying a cap once the number of dwellings delivered exceeds the target, it is ensured that other settlements in this tier will largely meet their housing requirement. Of the 10% for the Service Towns, 53% of Service Town supply 2018 - 33 will be in these settlements, slightly above the collective target for the three of 47%. This approach is explained further in the Housing Topic Paper. NPPF para. 67 notes that "Planning policies should identify a supply of: a) specific, deliverable sites for years one to five of the plan period; and b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan."
Policy 3 sets out the Plan's targets for both housing and employment development. Employment and infrastructure. The draft Plan allocated at least 481 hectares of employment land over the plan period (2015-2035). Of this there is no specific amount focused towards the Main Towns, including Armthorpe. For the plan to be positive and effective the plan needs to ensure that sufficient land is allocated in order to meet the ambitious employment land target set for the District.

Summary:
Policy 3 - employment. There is no specific amount of employment focused towards the Main Towns and for the plan to be positive and effective it needs to ensure that sufficient land is allocated in order to meet the ambitious employment land target set for the District.

Response:
Noted. The Local Plan does not allocate specific amount of employment land to each location. It is 481 ha in line with the Employment Strategy. There are sites within the Main Urban Area which either have planning permission or are currently vacant. The rest of the available land is accessible from the Main Urban Area.
Policy 3 sets out the Plan's targets for both housing and employment development. Housing development For a Local Plan to be considered positively prepared it must provide a strategy which, as a minimum, seeks to meet the area's Local Housing Need (LHN). Draft Policy 3 sets out the amount of housing to be developed over the plan period. The new Local Plan suggests a housing figure of 18,400 new homes over the plan period 2015-2035 (920 per annum). DMBC correctly use the Government's Standard Housing Methodology as a starting point and then consider the impact of economic growth to come to a more realistic housing need figure. MHCLG are explicit that if councils want a more ambitious local plan for growth then they should incorporate positive growth and housing figures (PPG 02a-010). DMBC by their own admission state they have "ambitious plans and ideas for the future of the borough". In reviewing the evidence for the housing need, this is set out as part of the Standardised Methodology (2014 ONS projections) and the Economic Forecasts and Housing Needs Assessment (2018). This provides a range of the Standardised Methodology targets whilst also setting an upper threshold of 920 dwellings per annum. In adopting a pure Standardised Methodology approach this is overly simplistic. If continued, there is a fundamental danger that the Local Plan will be found unsound by the Inspector and DMBC asked to revise its housing targets upwards accordingly. A higher housing figure is crucial in meeting the other aims and objectives of the framework. This will ensure that Doncaster remains an attractive location of choice for those wanting to live and work in the region and will encourage economic growth by being able to accommodate the influx of people and ensure the vitality of the urban area. In particular, it will allow regeneration and sustainability objectives to be met. Recommendation 2: Ensure that a positive growth strategy is incorporated into the LHN to ensure consistency with DMBC’s economic aims and objectives and Sheffield City Region Growth Strategy. In order to achieve this DMBC should adopt a higher housing target per annum in the interests of positive, consistent and effective plan making.

Response:
The Council has used the Standard Methodology figure of 585 and then increased its housing requirement to 920 dpa, as set out in the Economic Forecasts and Housing Needs Assessment (Peter Brett Associates, May 2018). This is a substantial increase which demonstrates positive, effective planning. No change needed.
IGas notes the Plan aims to facilitate the delivery of at least 481 hectares of employment land to help grow and diversify the Sheffield City Region and which would accommodate business, light industry and manufacturing and distribution warehouses to meet future employment needs and for which some sites are allocated. It is further noted that sufficient land to accommodate 18400 new homes needs to be delivered within the Plan period. The Sheffield City Region is densely populated and has a diverse range of industry and services most of which are likely to rely on hydrocarbons as an energy supply both in the form of gas or electricity produced by gas fired power stations. It is evident, notwithstanding the objectives of the Plan that this reliance will continue throughout the Plan period.

Summary:
Policy 3. Notes housing and employment figures. Hydrocarbons will be needed for heat and power, so reliance will continue during plan period.
Response:
Comment noted.
Policy 3: Level & Distribution of Growth

Tests of Soundness:
- Positively prepared
- Justified
- Effective
- Consistent with national

5.1 The policy is not sound as it is not positively prepared, justified, consistent with national policy or effective. Housing Requirement 5.2 Policy 3 of the Publication Draft of the Local Plan sets a target for at least 920 (net) new homes each year over the plan period 2015-2035 (18,400 homes in total) with sufficient land allocated to deliver the housing requirement. 5.3 This proposed level of housing growth remains unchanged since the draft policies consultation in 2018. Therefore, Pegasus continue to question whether this approach to meeting the needs for new homes demonstrates that the Plan is positively prepared and justified. The Housing Need Evidence Appraisal appended to this document provides our detailed evidence in this regard. In summary our reasons are: a) The Borough has a clear economic growth agenda - this is evidence in the draft Local Plan’s Vision and Objectives. Doncaster forms a key part of Sheffield City Region and target metrics produced independently for SCR LEP (note 1 - Source: Target Metrics Sheffield City Region: Metro Dynamics, June 2017) identify the need for jobs growth of 1.0% p.a. if the City Region is to improve its performance relative to the UK. Given that Doncaster has seen employment increase either at or above the levels experienced by SCR since 1998, and in line with its positive growth aspirations, it does not seem unreasonable to expect the Borough to align with the City Region target and for jobs growth in the District to average 1.0% in the long-term. Long-term economic aspirations should be properly planned for within this land use plan, to facilitate these aspirations becoming a reality. The impact of this would be to increase housing requirements from the current OAN of 920dpa to 1,073dpa - an additional 153 homes per annum. b) Affordability ratios in Doncaster have changed little over the past decade (4.81 - Source: 2018 Affordability Ratio Data), suggesting that the housing ladder remains out of reach for a substantial part of the local population. Build rates will therefore need to be high in the long-term to address this issue. Housing completion data for the Borough from 2004/5 and 2017/18 shows that it is capable of delivering in excess of 1,000 units per annum. c) The Office for National Statistics (ONS) published variant household projections in December 2018. These considered a range of variant projections to assist users in examining future growth scenarios. At this stage a variant which includes higher household formation rates for younger adults (those aged 25 to 44 years) has not been provided. The ONS is currently considering how to robustly evidence this variant. This variant will be critical as evidence suggests that such households were unable to form as freely as previous generations (due to high house prices, less access to finance etc.). An increase in housing numbers in Doncaster will help ensure that supply is able to meet demand - especially from younger adult who move into the area. (SEE EMAIL For Appended documents) 5.4 The PPG states the Government will be supportive of authorities who wish to plan for growth. In addition, the PPG identifies other factors which need to be considered when determining the housing requirement. These include growth strategies, planned infrastructure, previous levels of delivery and recent assessments of need such as Strategic Housing Market Assessments (SHMA) where this suggests a higher need (PPG ID 2a-010). These are all important considerations in the context of Doncaster. 5.5 Table 5.1, below, identifies net completions over the 14-year period from 2004/5 to 2017/18. During this period delivery rates have averaged 1,013 net additional dwellings. Since the start of the plan period (2015) average delivery rates have been higher at 1,140 net additional dwellings. Setting the housing requirement nearly 100 dwellings per annum (dpa) lower than average levels of delivery over the previous 14 years and 220dpa lower than the plan period average, would be contrary to the ethos of the NPPF and the Government’s continued desire to boost supply and delivery of housing. Table 5.1: Housing delivery in Doncaster (2004 to 2018) (note 2 - The figures for the years 2011/12 to 2017/18 are provisional and subject to revisions pending the release of future census dwelling stock data. Figure highlighted red are imputed.) - CANNOT SHOW AS RED - SHOWN WITH * AFTER NUMBER. Year: 2004/5 Dwellings completed (Net): 1,426 * Year: 2005/6 Dwellings completed (Net): 1,380 * Year: 2006/7 Dwellings completed (Net): 1,285 Year: 2007/8 Dwellings completed (Net): 1,414 * Year: 2008/9 Dwellings completed (Net): 1,709 Year: 2009/10 Dwellings completed (Net): 506 Year: 2010/11 Dwellings completed (Net): 817 Year: 2011/12 Dwellings completed (Net): 457 Year: 2012/13 Dwellings completed (Net): 316 Year: 2013/14 Dwellings completed (Net): 654 Year: 2014/15 Dwellings completed (Net): 792 Year: 2015/16 Dwellings completed (Net): 1,162 Year: 2016/17 Dwellings completed (Net): 1,049 Year: 2017/18 Dwellings completed (Net): 1,208 Year: Average 2004/5 to 2017/18 Dwellings completed (Net): 1,013 Year: Average 2015/16 to 2017/18 Dwellings completed (Net): 1,140 Year: Average 2009/10 to 2013/14 Dwellings completed (Net): 550 Source: MHCLG Live Table 122 5.6 To assist in the determination of the appropriate housing requirement, three alternatives have been considered through the SA. These are: - Option 1: 920dpa and 481ha employment land; - Option 2: 585dpa and 103ha employment land; and - Option 3: 753dpa and 242ha employment land. 5.7 The SA identifies Option 1 as the preferred option as it will "...meet local need but also enable employment-led growth in accordance with the Sheffield City Region Plan, whilst providing a degree of flexibility?" (SA, para. 5.3.5). From the options considered it is agreed that this is the most appropriate. However, the Council has failed to consider an option which promotes a higher housing requirement than 920dpa. Given previous rates of delivery, identified in table 4.1 above, it is considered a figure in excess of 1,000dpa should have been considered as a reasonable alternative. 5.8 Following setting the housing target for the Local Plan Period, draft Policy 3 progresses to state: ?For the purposes of calculating 5-year housing land supply, the requirement will be based on the Local Housing Need figure, as derived from the Standard Methodology, which will be reviewed and revised throughout the plan period in line with the latest household projections and affordability ratio. As such, the housing requirement is expressed as a range with the bottom of the range being the Local Housing Need figure and the top of the range being 920 dwellings per annum; 5.9 Pegasus have concerns regarding the Council’s proposed approach to calculating 5-year supply and the overall wording of Policy 3 in this regard. 5.10 Frist, Policy 3 sets a target for at least 920 (net) new homes each year over the plan period, but then when discussing the 'range of housing need' states that the top range of local housing need figure is 920dpa. Clearly, these two statements are
contrary to each other. 5.11 Second, we contend that the approach of Policy 3 in applying a lower housing need figure for the purposes of calculating 5-year housing supply is contrary to the approach of Policy 3 in setting a minimum requirement. We would question how, in the context of the need to significantly boost housing supply, seeking to meet a figure significantly below the minimum housing target and previous levels of delivery could be considered to be a pro-active or positive approach. Bawtry Housing Distribution 5.12 Bawtry is identified as being one of Doncaster’s Service Towns and will contribute to the overall 10% split of total housing development alongside Askern; Auckley-Hayfield Green; Barnburgh-Harlington; Barnby Dun; Carcroft and Skellow; Edlington; Finningley; Sportbrough; and Tickhill. I refer to our objections to Policy 2 with regards to the percentage split identified. 5.13 In the case of Bawtry itself, the Publication Draft identifies a requirement for growth of 110 dwellings across the plan period. However, the Council propose to allocate only 90 dwellings in the settlement, split between sites with and without planning permission. This means that there is a 20-dwelling shortfall between the number of units allocated and the settlement target growth. Paragraph 16.194 of the Local Plan discusses this matter stating: “As at 1st April 2018, there are permissions for 54 dwellings on sites large enough to allocate through the Local Plan (5+ units remaining). An additional two relatively small allocations are made through the plan; one being a greenfield urban site and the other a greenfield extension on land formerly designated as Green Belt. These two sites have a combined capacity of 36 new homes and bring the settlement’s housing allocation up to 90 dwellings for the plan period, which is 20 units short of its requirement. Any additional allocations would require large urban extensions on land currently designated as Green Belt where it is not considered exceptional circumstances exist to remove further sites for such a small shortfall in the context of additional sources of housing supply in the town. For example, at April 2018 there are permissioned small sites (1-4 units) that total 14 new homes and there will be additional windfall development within the town throughout the plan period so confidence that the town’s requirement of 105 new homes will have been met.” 5.14 As stated within Paragraph 16.194, the Council believe that meeting the 20-dwelling shortfall in Bawtry would require large urban extensions not appropriate for such a shortfall in the supply. Pegasus question the scale of the shortfall within Bawtry due to our comments relating to the housing requirement and distribution. We also refer to our previous comments upon the draft policies and proposed site informal consultation in relation to Green Belt. Within these comments we note that the exceptional circumstances (NPPF, para. 137) required to remove land from the Green Belt exist (Green Belt Phase 3 Report Summary). This allied with our comments upon distribution and the scale of the housing requirement provide a compelling case to provide further Green Belt release within Bawtry. The impact of the site on the Green Belt is discussed in greater detail below. 5.15 Paragraph 16.194 of the Publication Draft Plan suggests to overcome the shortfall is that the remainder of the need can be met through windfall development in the settlement across the plan period. This statement is however contrary to the subtext of Policy 6: Housing Allocations (Strategic Policy), which at policy 4.83 states: “The allocated supply has not been reduced to make allowance for windfalls and so all windfalls will be additional land supply to meet the plan period requirement.” 5.16 Despite this statement, it is clear that the Council have reduced the allocated supply to make allowance for windfalls in Bawtry. We believe this approach is flawed and additional allocations should be made to meet the required shortfall rather than relying upon windfall development. 5.17 Pegasus are concerned with any reduction or limitation on the housing target for a settlement purely on the basis that it is in a Green Belt location. The housing target for a settlement should be focused on the need to ensure the settlement can grow in a sustainable manner to support the local community and its population. Housing allocations, and Green Belt release, should then be made according to meeting that need.

Summary:
The policy is unsound as it is not positively prepared, justified, consistent with national policy or effective. 920dpa is unchanged since the draft policies consultation in 2018. Continue to question whether this approach to meeting the needs of new homes demonstrates that the plan is positively prepared and justified, as: a) The borough has a clear economic growth agenda. In line with the SCR, 1% growth does not seem unreasonable. Long term aspirations should be planned for to make aspirations a reality and the housing requirement should therefore be 1,073dpa as suggested in the PBA report. b) Local affordability ratios have changed little over the past decade suggesting the housing ladder remains out of reach for many local people. High build rates are therefore required in the long term to address the issue. Completion data 04/05 - 17/18 shows it is capable of delivering 1,000+ dpa. c) ONS published variant household projections in December 2018. The variant for higher household formation rated for 25 - 44 year olds has not been provided and ONS are considering how to robustly evidence it. Evidence suggests that such households are unable to form as freely as previous generations. Increased housing will ensure supply can meet demand especially from young adults moving into the area. The government are supportive of authorities planning for growth. From 04/05 - 17/18 delivery rates have averaged 1,013 net additional dwellings. From 2015 the average is higher - 1,140dpa net additional. Setting the requirement almost 100 dwellings below this over the last 14 years / 220 lower than the plan period average would be contrary to the ethos of the NPPF and governmental drive to boost the supply of housing. Figures (MHCLG Live table 122): Year: 2004/5 Dwellings completed (Net): 1,426* Year: 2005/6 Dwellings completed (Net): 1,380* Year: 2006/7 Dwellings completed (Net): 1,285 Year: 2007/8 Dwellings completed (Net): 1,414* Year: 2008/9 Dwellings completed (Net): 1,709 Year: 2009/10 Dwellings completed (Net): 506 Year: 2010/11 Dwellings completed (Net): 817 Year: 2011/12 Dwellings completed (Net): 457 Year: 2012/13 Dwellings completed (Net): 316 Year: 2013/14 Dwellings completed (Net): 654 Year: 2014/15 Dwellings completed (Net): 792 Year: 2015/16 Dwellings completed (Net): 1,162 Year: 2016/17 Dwellings completed (Net): 1,208 Year: Average 2004/5 to 2017/18 Dwellings completed (Net): 1,013 Year: Average 2015/16 to 2017/18 Dwellings completed (Net): 1,140 Year: Average 2005/10 to 2013/14 Dwellings completed (Net): 550 The SA failed to consider an option to plan for a higher housing requirement than 920dpa - given the rates of delivery shown, this option should have been assessed as an alternative. Also have concerns about the approach for calculating 5 year supply and the overall wording of Policy 3 in this regard. Policy 3 sets a target for at least 920 dpa, but when discussing the range of housing need, the top of the range is stated to be 920dpa. This is contradictory. Contend that the lower need figure being applied for 5 year supply purposes is contrary to the approach of policy 3 in setting a minimum requirement. Question how, in the context of the need to significantly boost housing supply, seeking to meet a figure significantly below the minimum housing target and previous levels of delivery could be considered to be a pro-active or positive approach. Object to the percentage split for Service Towns and Villages (see Policy 2 response). The Council has only identified 90 / 110 sites so there is a 20 unit shortfall. Given comments about the housing requirement / distribution (Policy 2) the scale of the shortfall is questioned. Additionally feel that exceptional circumstances to remove the site from the Green Belt exist (see previous comments to the draft Local Plan). This, alongside comments on housing distribution and scale of housing required provide a compelling case to allocate the site. Para. 16.194 suggests the remainder of the shortfall can be met through windfall development in Bawtry. This is contrary to Policy 6 (para. 4.83) which states the allocated supply has not been reduced to make allowance for windfalls so all windfalls will be additional land supply to meet the plan period requirement. Despite this, it is clear that the approach is flawed and additional allocations should be made to meet the required shortfall rather than relying on windfalls. Concerned with any reduction or limitation on the housing target purely on the basis it is a Green Belt location. The housing target should focus on the need and ensure the settlement can grow in a sustainable manner to support the local community and its population. Allocations and Green Belt release should be made according to meeting that need.
The figure is derived from the Standard Methodology and an economic uplift in line with SCR ambitions. A number of ways of calculating the housing requirement have been put forward. Housing completion figures are available in the RLA, with this report showing that in the period stated, the housing completions average out at 659 dpa, with 1,000 dpa only being surpassed in the years 2015 - 18. As set out in the Green Belt Topic Paper, it is not deemed that exceptional circumstances exist which warrant the removal of more land from the Green Belt to make up for the 20 unit shortfall in Bawtry, and this will be made up elsewhere in the borough. Windfalls are additional as they have not been factored in to any calculations, however even without factoring these in, the borough can meet its housing requirement across the plan period.
4.1 The policy is not sound as it is not positively prepared, justified, consistent with national policy or effective. Housing Requirement 4.2 Policy 3 of the Publication Draft of the Local Plan sets a target for at least 920 (net) new homes each year over the plan period 2015-2035 (18,400 homes in total) with sufficient land allocated to deliver the housing requirement. 4.3 This proposed level of housing growth remains unchanged since the draft policies consultation in 2018. Therefore, Pegasus continue to question whether this approach to meeting the needs for new homes demonstrates that the Plan is positively prepared and justified. The reasons for this remain as the previous representation: a) The Borough has a clear economic growth agenda - this is evident in the draft Local Plan’s Vision and Objectives. Doncaster forms a key part of Sheffield City Region and target metrics produced independently for SCR LEP (note 1 - Source: Target Metrics Sheffield City Region: Metro Dynamics, June 2017) identify the need for jobs growth of 1.0% p.a. if the City Region is to improve its performance relative to the UK. Given that Doncaster has seen employment increase either at or above the levels experienced by SCR since 1998, and in line with its positive growth aspirations, it does not seem unreasonable to expect the Borough to align with the City Region target and for jobs growth in the District to average 1.0% in the long-term. Long-term economic aspirations should be properly planned for within this land use plan, to facilitate these aspirations becoming a reality. The impact of this would be to increase housing requirements from the current OAN of 920dpa to 1,073dpa - an additional 153 homes per annum, as suggested by the Council’s housing need evidence prepared by Peter Brett Associated for the Draft Local Plan. b) Affordability ratios in Doncaster have changed little over the past decade (4.31 - Source: 2018 Affordability Ratio Data), suggesting that the housing ladder remains out of reach for a substantial part of the local population. Build rates will therefore need to be high in the long-term to address this issue. Housing completion data for the Borough from 2004/5 and 2017/18 shows that it is capable of delivering in excess of 1,000 units per annum. c) The Office for National Statistics (ONS) published variant household projections in December 2018. These considered a range of variant projections to assist users in examining future growth scenarios. At this stage a variant which includes higher household formation rates for younger adults (those aged 25 to 44 years) has not been provided. The ONS is currently considering how to robustly evidence this variant. This will vary as critical evidence suggests that such households were unable to form as freely as previous generations (due to high house prices, less access to finance etc.). An increase in housing numbers in Doncaster will help ensure that supply is able to meet demand - especially from younger adult who move into the area. 4.4 The PPG states the Government will be supportive of authorities who wish to plan for growth. In addition, the PPG identifies other factors which need to be considered when determining the housing requirement. These include growth strategies, planned infrastructure, previous levels of delivery and recent assessments of need such as Strategic Housing Market Assessments (SHMA) where this suggests a higher need (PPG ID 2a-010). 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These are: - Option 1: 920dpa and 481ha employment land; - Option 2: 585dpa and 103ha employment land; and - Option 3: 753dpa and 242ha employment land. 4.7 The SA identifies Option 1 as the preferred option as it will "...meet local need but also enable employment-led growth in accordance with the Sheffield City Regional Plan, whilst providing a degree of flexibility?" (SA, para. 5.3.5). From the options considered it is agreed that this is the most appropriate. However, the Council has failed to consider an option which promotes a higher housing requirement than 920dpa. Given previous rates of delivery, identified in table 4.1 above, it is considered a figure in excess of 1,000dpa should have been considered as a reasonable alternative. 4.8 Following setting the housing target for the Local Plan Period, draft Policy 3 progresses to state: "For the purposes of calculating 5-year housing land supply, the requirement will be based on the Local Housing Need figure, as derived from the Standard Methodology, which will be reviewed and revised throughout the plan period in line with the latest household projections and affordability ratio. As such, the housing requirement is expressed as a range with the bottom of the range being the Local Housing Need figure and the top of the range being 920 dwellings per annum; 4.4 Pegasus have concerns regarding the Council’s proposed approach to calculating 5- year supply and the overall wording of Policy 3 in this regard. 4.5 Frist, Policy 3 sets a target for at least 920 (net) new homes each year over the plan period, but then when discussing the 'range of housing need' states that the top range of local housing need figure is 920dpa. Clearly, these two statements...
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Summary:
The policy is unsound as it is not positively prepared, justified, consistent with national policy or effective. 920dpa is unchanged since the draft policies consultation in 2018. Continue to question whether this approach to meeting the needs of new homes demonstrates that the plan is positively prepared and justified, as: a) The borough has a clear economic growth agenda. In line with the SCR, 1% growth does not seem unreasonable. Long term aspirations should be planned for to make aspirations a reality and the housing requirement should therefore be 1,073dpa as suggested in the PBA report. b) Local affordability ratios have changed little over the past decade suggesting the housing ladder remains out of reach for many local people. High build rates are therefore required in the long term to address the issue. Completion data 04/05 - 17/18 shows it is capable of delivering 1000+ dpa. c) ONS published variant household projections in December 2018. The variant for higher household formation rated for 25 - 44 year olds has not been provided and ONS are considering how to robustly evidence it. Evidence suggests that such households are unable to form as freely as previous generations. Increased housing will ensure supply can meet demand especially from young adults moving to the area. The government are supportive of authorities planning for growth. From 04/05 - 17/18 delivery rates have averaged 1,013 net additional dwellings. From 2015 the average is higher - 1,140dpa net additional. Setting the requirement almost 100 dwellings below this over the last 14 years / 220 lower than the plan period average would be contrary to the ethos of the NPFF and governmental drive to boost the supply of housing. Figures (MHCLG Live table 122): Year: 2004/5 Dwellings completed (Net): 1,426* Year: 2005/6 Dwellings completed (Net): 1,380* Year: 2006/7 Dwellings completed (Net): 1,285 Year: 2007/8 Dwellings completed (Net): 1,414* Year: 2008/9 Dwellings completed (Net): 1,709 Year: 2009/10 Dwellings completed (Net): 506 Year: 2010/11 Dwellings completed (Net): 817 Year: 2011/12 Dwellings completed (Net): 457 Year: 2012/13 Dwellings completed (Net): 316 Year: 2013/14 Dwellings completed (Net): 654 Year: 2014/15 Dwellings completed (Net): 792 Year: 2015/16 Dwellings completed (Net): 1,162 Year: 2016/17 Dwellings completed (Net): 1,049 Year: 2017/18 Dwellings completed (Net): 1,208 Year: Average 2004/5 to 2017/18 Dwellings completed (Net): 1,013 Year: Average 2015/16 to 2017/18 Dwellings completed (Net): 1,140 Year: Average 2009/10 to 2013/14 Dwellings completed (Net): 550 The SA failed to consider an option to plan for a higher housing requirement than 920dpa - given the rates of delivery shown, this option should have been assessed as an alternative. Also have concerns about the approach for calculating 5 year supply and the overall wording of Policy 3 in this regard. Policy 3 sets a target for at least 920 dpa, but when discussing the range of housing need, the top of the range is stated to be 920dpa. This is contradictory. Contend that the lower need figure being applied for 5 year supply purposes is contrary to the approach of policy 3 in setting a minimum requirement. Question how, in the context of the need to significantly boost housing supply, seeking to meet a figure significantly below the minimum housing target and previous levels of delivery could be considered to be a pro-active or positive approach.

Response:
The figure is derived from the Standard Methodology and an economic uplift in line with SCR ambitions. A number of ways of calculating the housing requirement have been put forward. Housing completion figures are available in the RLA, with this report showing that in the period stated, the housing completions average out at 659 dpa, with 1,000 dpa only being surpassed in the years 2015 - 18. As set out in the Green Belt Topic Paper, it is not deemed that exceptional circumstances exist which warrant the removal of more land from the Green Belt to make up for the 20 unit shortfall in Bawtry, and this will be made up elsewhere in the borough. Windfalls are additional as they have not been factored in to any calculations, however even without factoring these in, the borough can meet its housing requirement across the plan period.
Policy 3: Level & Distribution of Growth

Pegasus Group

Positively prepared

SHOWN WITH * AFTER NUMBER. Year: 2004/5 Dwellings completed (Net): 1,426* Year: 2005/6 Dwellings completed (Net): 1,140

Option 3: 753dpa and 242ha employment land. CANNOT SHOW AS RED

Attend Hearing

Reason: Please refer to representation 004A.ER/P17-1591

Area: Chapter 4: Strategic Approach

Policy: Policy 3: Level & Distribution of Growth

Tests of Soundness: Positively prepared Effective Justified Consistent with national

Comment:

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Framecourt Homes welcomes the opportunity for further engagement and the opportunity to appear at the Examination in Public.

Area: Chapter 4: Strategic Approach

Policy: Policy 3: Level & Distribution of Growth

Tests of Soundness:

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<th>Positively prepared</th>
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Comment:

5.1. Framecourt Homes is concerned that the Doncaster Local Plan Draft Policies and Proposed Sites is deficient in its content and evidence base and does not reflect national guidance. Test of Soundness 5.2. Framecourt Homes considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 5.3. Framecourt Homes have a number of concerns in relation to the Level and Distribution of Growth. The concerns relate to the following: - The Local Plan housing requirement is not sufficient and is not fully aligned with forecast economic growth. - The Local Plan identifies significantly more employment land than the target for provision established in Policy 3. - There is a significant mismatch between the level of employment land allocated and the level of housing land allocated in the Plan period; and - The identified supply is not sufficient to meet the Councils identified requirement. Need 5.4. Framecourt Homes is concerned with the proposed level of new housing being planned for in the Local Plan. Policy 3 makes provision for 18,400 dwellings to be delivered between 2015 and 2035, equivalent to 920 net new homes each year. Policy 3 states that there should be sufficient allocations for 15 years supply, which is 13,230 new homes. 5.5. Framecourt Homes has commissioned Regeneris Consulting to review the OAN and the Economic Forecasts and Housing Needs Assessment (2018). The Regeneris report is attached to these representations. Regeneris conclude that: - The target delivers the minimum level of housing need for Doncaster based on the standard method (585 dpa) and makes an upward adjustment to support economic growth. - The upward adjustment was based on evidence produced by PBA which recommended housing need is presented as a range between 585 dpa (the minimum) and 912 dpa. The upper limit was based on matching Jobs growth aspirations of the Sheffield City Region LEP (1,420) over the period 2016 to 2026. - However, PBA have made unjustified and unrealistic assumptions for a number of factors which all suppress the level of housing required to support future employment growth. In particular, we disagree with their assumptions about commuting, double jobbing and household formation rates. (SEE EMAIL FOR Regeneris Report) 5.6. Regeneris consider that: - Doncaster has been one of the fastest growing economies in Yorkshire and Humber. The district has created around 24,000 jobs between 2000 and 2017, representing a growth rate of 1.1% p.a - Doncaster’s key asset is its connectivity by road, rail and air which has made it a highly attractive location for inward investment, particularly for industrial and logistics occupiers, with over 1.1m sq m of industrial/warehouse space taken up since 2010. - The strong performance is also due to a significant improvement in key economic indicators, including skills and levels of enterprise. The business start-up rate has more than doubled since 2010 and is now in line with the national average. These improvements have removed a key barrier to growth and mean that Doncaster is well placed to continue its high rate of growth. - The Local Plan has set a target of delivering 481 hectares of employment land between 2015 and 2035 and a number of ELR’s shows there continues to be very strong market demand for industrial space in Doncaster. There is therefore strong potential for Doncaster to accommodate high levels of inward investment in future which would also drive jobs growth. 5.7. Framecourt Homes have concerns that the proposed housing requirement does not represent an appropriate figure once consideration is given to the potential for economic growth and job formation. Framecourt Homes continue to consider that an appropriate balance should be sought between employment growth aspirations and the provision of homes. 5.8. The Framework (2019) reaffirms the Governments’ commitment to ‘significantly boost the supply of homes’ and states that ‘it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed’. It goes on to state ‘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 and alternative approach which also reflects current and future demographic trends and market signals’. 5.9. NPPG is clear that the standard method identifies a minimum annual housing need figure and that it does not produce a housing requirement figure Paragraph 002 Reference ID: 2a-002-20190220. It is also clear that the affordability adjustment within the standard methodology is just to ensure that the minimum housing needs starts to address affordability of homes. It therefore does not fully address affordability issues. Paragraph 006 Reference ID :2a-006-201902020. 5.10. NPPG goes on to identify the circumstances when it is appropriate to plan for a higher housing need figure than the standard methodology identifies. The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides the minimum starting point in determining the number of homes needed in an area?it does not predict the impact of future government policies, changing economic circumstances or other factors that might have an impact on demographic behaviour. Therefore there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicate. 5.11. This will need to be assessed prior to and separate from, considering how much of the overall need can be accommodated. Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: 5.12. Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth 5.13. Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; 5.14. An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground. 5.15. There may, occasionally be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced SHMA) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need that the standard model suggests’. Paragraph 010 Reference ID: 2a-010-20190220. 5.16. The Council need to recognise that the development of new housing will bring forward additional economic benefits to the area. The relationship between economic performance in an area and housing is complex, but having the
right quantity, quality and balance of housing in an area is necessary for economic growth. The development of new housing can therefore support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population which will create sustainable local jobs from the increased demand for goods and services. This provides an important sustainable development opportunity for Doncaster. 5.17. Importantly the HBF released in July 2018 its report on “the economic footprint of house building in England and Wales”, which shows that house building in England and Wales is now worth £38bn a year and supports nearly 700,000 jobs. House building activity contributes economically in different ways including providing jobs, tax revenues and contributing funding for local infrastructure and communities. House building supports the economy in a wider sense through being drive for economic growth; delivering jobs and housing value; supporting labour market mobility; creating skills and employability; enhancing place competitiveness; creating quality of place and reusing brownfield land. 5.18. An important conclusion of the report and the wider economic benefits is that a healthy, well-functioning labour market requires a good supply of housing that is affordable for local people to enable them to move jobs freely and match up skills supply with employer demand. A dysfunctional housing market can inhibit labour market mobility, in turn stifling economic growth. 5.19. Regeneris consider that Doncaster’s housing need over the plan period should be 1,100 dpa to support future economic growth. Regeneris consider that the target of 920 dpa would risk constraining the future economic growth of Doncaster. 5.20. Furthermore, it is evident that the council are seeking to align economic growth with housing growth and have identified provision above the local housing need figure to which the council considers accounts for Job Led growth. However, the jobs led growth figure is based on jobs growth forecast between 2015-2032. It is not clear whether consideration has been given to the additional job growth expected to the end of the plan period. Therefore Framecourt consider there is potential for the jobs led scenario to underestimate the jobs growth over the full plan period. The associated uplift to the housing requirement will therefore not be sufficient to meet the full needs over the plan period. 5.21. Additionally, the Council have identified a requirement for 481 hectares of employment land based on the Job Led scenario, and accounting for the extended plan period between 2032 and 2035. The explanatory text considers that this requirement is met through 117 hectares of land developed between 2015-2018, 201 hectares of land benefiting from planning permission, and 164 hectares of allocated sites. However, there is a discrepancy between the totals in paragraph 4.61 of the Plan and the figures arising from Tables E1 to E8. The sites that benefit from planning permission in tables E1 to E8 equate to 284.09 ha of employment land available within the Plan period. This leads to a total provision of 565.77 hectares of employment land against a requirement of 481 hectares. It should be noted that within the permissions identified in tables E1 to E8 that additional employment land is available, adding to the potential supply. There is therefore a significant mismatch between the level of planned employment provision in Policy 4 and the planned housing provision. Therefore, the housing requirement needs to be uplifted to reflect the identified level of employment land provision. 5.22. As stated above NPPG indicates that consideration can be given to delivery rates, for the last three years completions have been consistently higher than the proposed local plan target. Net completions amount to 3211 dwellings, with annual completions as follows: Year: 2015-16 Net Completions: 1,025 Year: 2016/17 Net Completions: 1,049 Year: 2017/18 Net Completions: 1,137 Total Net Completions: 3,211 5.23. This demonstrates that there is sufficient demand to support a requirement above 920 dwellings per annum. 5.24. The Councils Economic Forecasts and Housing Needs Assessment (PBA, 2018) considers the housing requirement prior against both the standard methodolgy, standard methodology with an uplift for economic growth and previous approach for identifying housing need. Following the earlier approach, PBA consider that an aspirational job led figure, based on the SEP ambitions, would equate to a requirement of 1,073. PBA considered that it would be prudent to plan for between 562 and 1073. To ensure that the requirement was realistic. It is worthy of note that the Employment Land Needs Assessment (2019). Considers that the Job led scenario was ambitious but realistic and notes the significant growth in Doncaster within the previous 15 years in line with SCR growth aspirations. And further the evidence of land take up and jobs growth for the period 2015-2018 was on target to meet 1% jobs growth per annum. This would support a target at the higher end of the range. 5.25. There is therefore evidence of both delivery at a higher rate and recently published evidence that indicates a higher need for housing. As stated above NPPG is clear that this evidence should be taken into account when determining the housing requirement. 5.26. When using the standard method the housing need figure was 585, applying a job led figure to match the SEP led to a requirement of 912 (PBA, 2018). However this is not based on the Jobs growth over the full plan period. 5.27. Framecourt Homes consider further evidence is required to demonstrate whether the affordable housing needs of Doncaster can be met based on a target of 920. The explanatory text states that the current need for affordable housing, 209 affordable units, represents 23 % of the Local Plan requirement for housing. Paragraph 6.9 states that this does not take into account current completions or viability. The completions affordable completions for the last three years (first three years of the Local Plan) are as follows: Year: 15/16 Affordable Completions: 151 Total Completions: 1,088 Affordable completions (%):13.88 Year: 16/17 Affordable Completions: 161 Total Completions: 1,067 Affordable completions (%):15.09 Year: 17/18 Affordable Completions: 166 Total Completions: 1,208 Affordable completions (%):13.74 5.28. The total affordable completions falling below the identified affordable need, even when total completions are higher than the proposed Local Plan requirement of 920. Further, Policy 8 identifies a requirement for 23% affordable housing in high/medium value areas and 15% in low value areas. An as indicated in response to Policy 8 and Policy 67, this is demonstrated to be unviable for a number of sites, including all types of sites in low value areas. Framecourt Homes are therefore concerned that a target of 920 dwellings will not deliver sufficient number and range of affordable homes to meet the identified need for affordable homes in the Borough. In order to deliver 209 affordable dwellings per year, a requirement of at least 1,393 would be required. This assuming the achievement of an average of 15% affordable housing, which represents the highest achieved over the last three years of monitoring. 5.29. Framecourt Homes consider that there is sufficient evidence in point to the need for further uplift in the Local Plan housing requirement, based on the significant mismatch between housing and employment land allocations, the need to support the local plans economic ambitions, evidence of delivery and the need to ensure sufficient delivery of affordable housing. 5.30. Framecourt homes consider that the policy in its current form is not justified and is not consistent with the Framework the Plan and its proposed approach. In accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 5.31. However, Framecourt Homes consider that with a higher requirement, of at least 1,100 to meet the economic growth aspirations, and further uplifts to balance housing allocations with the employment land allocations, and to ensure that the needs for affordable homes can be met (up to 1393) that the Local Plan can be found sound. Framecourt Homes will continue to work with the Council to develop appropriate modifications to the Local Plan Housing Supply and Delivery 5.32. Framecourt Homes is concerned that the Council’s approach to delivering the housing requirement does not appear to reflect national guidance. 5.33. The Council is not demonstrating sufficient flexibility in the supply of housing land to ensure that the Plan can meet identified needs in full. The Framework is clear that plans should be sufficiently flexible to adapt to rapid change, and emphasises the importance of ensuring that a sufficient amount and variety of land can come forward where it is needed. 5.34. PPG is clear that careful attention should be given to providing an adequate supply of land, and the Plan needs to be realistic about what can be achieved and when. Authorities need to ensure that policies setting out contributions expected from development do not undermine the deliverability of the Plan. (Paragraph 59 Reference ID: 61-059-20190315. 5.35. At present based on the Councils figures presented in the Local Plan, a Plan requirement of 18400, completions equating to 3400 and allocations equating to 16,055, there is a flexibility of around 1055 dwellings which equates to 5% of the Local Plan Requirement. Framecourt Homes consider that this is insufficient given the potential for non-delivery and under delivery of sites, particularly from the dependency on a number of large sites. As set out in our response to a number of policies within the plan and specifically Policies 8, 46,
66 and 67, Framecourt Homes are concerned that some of the policies may undermine the deliverability of sites, or lead to the need for further site specific viability testing impacting on the timing of delivery and therefore there is a need for greater flexibility in the housing supply. Specific sites are identified later in this section. 5.36. Framecourt Homes have a number of concerns relating to the supply in the Plan in terms of completions, the allocations from permissions and the new allocations. 5.37. It is noted that the supply attributed to completions appears to be resultant from gross completions rather than net completions. The Plan indicates that completions between 2015 and 2018 equate to 3400, however data in the Residential Land Availability Report indicates that there are net completions amount to 3211. This would increase the residual requirement based on an OAN of 920 to at least 15,189, and reduce the flexibility in the Plan to 866 dwellings (4.7%). 5.38. With regards to overall supply from permissions and allocations, a housing trajectory has been provided. Framecourt Homes are concerned that this demonstrates that the Council will struggle to maintain a continuous supply of housing particularly in the later phases of the Plan period. Only four sites are identified as being capable of delivery in the final years of the plan period and two sites delivering beyond the plan period. 5.39. Furthermore, the Council’s HELAA and Residential Land Availability Report have a base date of March 2018, thus a whole monitoring year is presently absent. This evidence base should therefore be updated. 5.40. In terms of existing commitments it appears that the Council assumes 100% delivery and no discount has been applied. Best Practice and Guidance suggests that at least a 10% discount should be applied on sites with extant planning permission but this could vary depending on site specific constraints and complexity. Framecourt Homes supports the discounting of sites with planning permission but consider it may be beneficial to include a higher level of discount for large sites to take into account unforeseen circumstances and delivery delays. Framecourt Homes consider therefore that from a commitments pot of 9,488 dwellings a discount of at least circa 948 should be applied, however this could feasibly be higher given the history and constraints of a number of sites. 5.41. Framecourt Homes is concerned with the reliance on some existing housing sites with planning permission and their potential delivery, particularly as some are fairly historic brownfield sites with viability concerns in market challenging areas. There are a considerable number of outstanding planning permissions in poor market areas, some of which are also constrained by flood risk. Evidence of developer interest in such sites should be a fundamental requirement to provide confidence on delivery. For example, a brief review of some sites being shown as commitments shows considerable concern: Site Ref: 838 Site Name: Hexthorpe No. of Dwellings: 930 Framecourt Homes Comment: There have been a number of planning applications and proposed schemes over the years, but there has been no delivery on site. Countryside PLC have submitted a planning application, which the Environment Agency has objected to and recommends refusal. There is conflicting evidence in terms of delivery rates, with the Local Plan and the HELAA. There are significant flooding constraints affecting the site. No further deliverability evidence has been produced in the Doncaster 5 Year Deliverable Housing Land Supply Statement. The Residential Land Availability Study notes that at 31/03/2018 there were no completions and the site is not currently being developed. Site Ref: 843 Site Name: Manor Farm, Bessacarr No. of Dwellings: 1,009 Framecourt Homes Comment: This is a Persimmon / Charles Church scheme. However, delivery has become frustrated by the need to deliver infrastructure to complete development. Since there is only one developer on the site the development trajectory is likely to be modest and development of the site is unlikely to be achieved during the plan period. The Residential Land Availability Report indicates completed in 17/18 which is below the rates expected in the Local Plan and HELAA. Which assumes delivery rates of around 70 dwellings a year. This is not realistic based on current delivery. Site Ref: 418 Site Name: Unity/DN7 Initiative No. of Dwellings: 905 Framecourt Homes Comment: The site has outline planning permission for 3,100 homes. No reserved matters have been submitted. The site is in significant multiple ownership and understand that CPO procedures will be employed to facilitate the delivery of requisite infrastructure. Homes England is also assigning public funding to support the development. Given the presence of multiple landowners, the need for considerable public funding, the likelihood of a protracted timeframe to open up the site for development and the absence of confirmed market interest, the site is unlikely to deliver the Council’s prediction of 1015 homes in the plan period. The HELAA does not anticipates a start on site until years 6 to 10. However the local plan indicates a 175 completions in the first five years. Higher rates of delivery are expected in the following years (70 dwellings per annum). These rates are overly optimistic especially when compared to annual completions for individual sites recorded in the residential land availability report. Site Ref: 569 Site Name: Askern Saw Mills No. of Dwellings: 220 Framecourt Homes Comment: This is a long standing, unimplemented planning permission that has been available but has remained undeveloped. There is no developer interest and consequently the assumed delivery of 220 new homes is optimistic. Indicated in the Residential Land Availability Report that the outline permission has lapsed. Site Ref: 984 Site Name: Former McCormick Tractors No. of Dwellings: 600 Framecourt Homes Comment: This site has significant constraints. There is an outline permission relating to the development of the site. The Local Plan assumes a delivery rate of 56 dwellings per in the first five years and 64 dwellings per annum in the following years. This is overly optimistic and not consistent with the planning status and constraints on site. Site Ref: 940 E1 and E2 Site Name: Land east of Poplars Farm No. of Dwellings: 280/920 Framecourt Homes Comment: Site 940 is allocated in the plan for development of up to 280 dwellings (Part E1), Part E2 is identified as a reserved housing site for up to 920 dwellings. This site does not form a true reserve site. The council have identified a release mechanism which restricts the release of housing to net additional jobs delivered at the airport. 5.42. Framecourt Homes understands that no allowance has been made for demolitions. No evidence is apparent and Framecourt Homes consider it would be appropriate for this evidence to be forthcoming. 5.43. The availability of land is crucial. To be considered deliverable the land needs to be available now and in terms of developable there needs to be a reasonable prospect that land will be available at the point envisaged. Framecourt Homes consider that sites which are not available or are unknown should not be included in the Plan or a buffer should be provided due to the uncertainty on delivery. Site Ref: 1028 Site Name: Tickhill No. of Dwellings: 74 Framecourt Homes Comment: This site does not have access, therefore cannot be considered to be deliverable. Further, the capacity of the site is unrealistic. This is a 1.5 hectare site, a capacity of 44 dwellings would reflect the assumptions on net to gross developable area and density set out in the Viability Study. Site Ref: 662/247 Site Name: Colliery Site, Rostonning No. of Dwellings: 897/237 Framecourt Homes Comment: The delivery rates on the site are overly optimistic and not consistent with the planning status and constraints on site. There were only 8 dwellings delivered on site so far and it is considered that only 600 dwellings will be capable of coming forward within the Plan period. This is significantly less than the 1127 homes forecast within the Plan. Site Ref: 081/343 Site Name: Thorne No. of Dwellings: 207 Framecourt Homes Comment: This is a longstanding allocation and there is little evidence available through the councils evidence base to demonstrate that there is developer interest or that the site will come forward in the short term. Site Ref: 795 Site Name: Thorne No. of Dwellings: 13 Framecourt Homes Comment: This site had permission which has since lapsed. There appears to be little developer interest in this site. The site is not considered to be deliverable. Site Ref: 510 Site Name: Thorne No. of Dwellings: 25 Framecourt Homes Comment: This is a narrow and constrained infill site, with railway forming the southern boundary of the site. There is little evidence available through the Councils evidence base to indicate any developer interest in the site. Site Ref: 165/186 Site Name: Carcroft No. of Dwellings: 300 Framecourt Homes Comment: This site is located to the western edge of the settlement and is relatively distant from the key services and facilities such as the train station, and employment opportunities. Other sites are located nearer to key services. 5.44. A high level assessment of some of the proposed allocations shows that some proposals are at risk and hence one of the reasons why Best Practice suggests a buffer to the housing requirement should be included in the Plan. Furthermore, would appear to have least heavily on allocating sites that already have planning permission as an alternative to identifying a sufficient supply of new allocation sites to meet its requirement for the plan period. Consequently, a number of settlements with strong sustainability credentials would appear to have insufficient allocations to meet their needs through the life of the plan. 5.45. It would appear in some instances that there are unrealistic
assumptions on gross to net developable site areas and on the resultant yields from proposed allocations, especially when considering some of the development requirements. Framecourt Homes therefore suggest that further sites should be identified. 5.46. The Council therefore need a wider choice of sites across a number of different areas and market areas to gain traction and increase build rates. To achieve the housing requirement the Council need at least 30-35 housing outlets operating across the Borough for every year of the Plan and Framecourt Homes do not believe the Plan can deliver this, particularly in the middle to later years. 5.47. Framecourt Homes considers the Council should be more realistic on the potential delivery on sites, particularly on sites which have not commenced preparations of securing the relevant planning permission and developer interest and on build rates. Framecourt Homes consider that the sites with no planning permission should not be providing completions until 2023/24 (which is two years post adoption) as there is significant work and preparations to commence on site, including time to prepare and submit the planning application, gain planning permission, discharge conditions, legal agreements, site preparations, and commence house building. This process can take around 2 years. 5.48. Framecourt Homes would be happy to work through the specific sites in detail with the Council to seek to reach agreement on the HELAA and current housing commitments. Interestingly, in line with the general direction of travel for this Local Plan the new Framework (2019) defines the term Deliverable in the glossary stating that sites can only be considered deliverable where they have detailed planning permission. If they have outline planning permission or are allocated in a plan a site can only be considered if there is clear evidence that housing completions will begin on site within five years. The level of evidence that must be provided to demonstrate that sites are deliverable has therefore been tightened. 5.49. Framecourt Homes considers that the main risks to the delivery of the housing requirement are slippages in the delivery of allocations, longer lead-in times, reduced housing capacity on sites, sites no longer coming forward as result of viability from policy obligations set out in the Local Plan. Given these risks Framecourt Homes would suggest a greater flexibility is incorporated into the Local Plan especially in light of Framecourt Homes’ conclusions on the actual housing requirement. 5.50. Framecourt Homes would encourage the Council to review the existing commitments to ensure this is still deliverable, whether there is a housebuilder on board and whether there are any constraints preventing development from coming forward. Framecourt Homes would also ask the Council to look at the proposed delivery of site allocations to determine whether the delivery rates are appropriate and the sites are deliverable in light of the policy obligations proposed in the Local Plan. 5.51. Taking into account the above, the Council should be making provision for: Annual Housing Requirement Council Figures: 920 Framecourt Homes’s View: 1,100 Total Requirement (2015-2035) - which is 15 years post adoption Council Figures: 18,400 Framecourt Homes’s View: 22,000 Completions Council Figures: 3,400 Framecourt Homes’s View: 3,111 Total Commitments Council Figures: 9,488 Framecourt Homes’s View: 9,488 Non-Delivery Allowance (at least 10%) Council Figures: 948.8 Framecourt Homes’s View: 948.8 Total Allocations Council Figures: 6,567 Framecourt Homes’s View: 6,567 Total Supply Council Figures: 18,506 Framecourt Homes’s View: 18,317.2 Residual homes to be identified Council Figures: -106.2 Framecourt Homes’s View: 3,682.2 5.52. Therefore, on a best case scenario Framecourt Homes consider as a minimum there needs to be circa 3,682 new homes to be identified in the Plan to account for net completions, and economic growth. 5.53. This does not account for the uplift required to ensure affordable housing need is met in full, which as indicated in paragraph 5.28, would lead to a requirement of 1,393 dpa and a plan requirement of 27,860. Based on the current supply of 3,111 completions, 9,488 commitments, an allowance for 10% non-implementation, and the currently proposed allocations of 6,567 homes, this would lead to need for a further 9,542 additional homes. 5.54. Significantly, the scenarios above do not balance housing provision with the additional employment allocations. The additional employment allocations amount to 83.77 hectares above the requirement, this is the equivalent of an additional 3.5 years supply of land. As a result in order to balance the housing provision with the additional employment supply circa 3850 additional homes would be required, this amounts to an annual requirement of 1292.5 dpa. Framecourt Homes consider circa 7,532 additional homes are required in order to balance the Housing with Employment supply, account for net completions and appropriate non-implementation rates. Employment requirement 2015-2035 Framecourt Homes’s View: 481 hectares Annual employment requirement Framecourt Homes’s View: 24 hectares Employment land developed 2015-2018 Framecourt Homes’s View: 117 Sites with planning permission Tables E1 to E8 Framecourt Homes’s View: 284.09 New employment allocations Policy 4 Framecourt Homes’s View: 164.68 Total Allocations Framecourt Homes’s View: 565.77 Amount of land allocated over the requirement Framecourt Homes’s View: 83.77 Additional homes required to balance with employment land supply Framecourt Homes’s View: 3,850 Residual homes to be identified Framecourt Homes’s View: 7,532.2 5.55. These figures assume no changes to the currently identified housing sites, which, in response to policy 3 and policy 6, Framecourt Homes have raised significant concerns, particularly with regards the deliverability, capacity, and delivery rates of some sites and the overreliance on existing permissions or longstanding allocations. This does not account for additional economic growth associated with the airport 5.56. Furthermore, there does not appear to be any safeguarded sites or genuinely deliverable reserve sites identified within the Draft Plan. This is concern about Policy 6 states that the Plan will designate Reserve Development Sites. However, it states that the reserves sites identified are not considered developable in the plan period. Paragraph 4.43 of the Plan indicates that the reserve sites have flood risk mitigation issues or safeguarding issues associated with HS2 preventing them from coming forward. Framecourt Homes would suggest, in order to assist with flexibility, that safeguarded sites be proposed in accordance with national guidance. The only other reserve site is related to direct job growth at the Airport and is strictly controlled, thus does not provide flexibility for the Plan as a whole. 5.57. The above scenarios do not include a detailed analysis of existing commitments and proposed allocations, however from a high level analysis it is evident that the Council’s trajectory and analysis of sites is optimistic. 5.58. Therefore, with an increased housing requirement, reduced potential from existing planning permissions sites and incorporation of a flexibility allowance, further land will need to be identified. 5.59. Framecourt Homes consider that the appropriate areas and sites to accommodate growth would be: - Site 1019: Apy Hill Lane, Tickhill 5.60. A brief summary is provided for this Site in response to Policy 6. Technical information and an advocacy report for the site was submitted alongside the previous representations. This report is supported by significant technical information and the report demonstrates that the sites are available, suitable and achievable and therefore deliverable in accordance with the Framework and PPG. 5.61. Framecourt Homes consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 5.62. However, Framecourt Homes consider that with an appropriate uplift to the housing requirement, consideration of net completions, non-implementation rates and the allocation of additional land and safeguarded sites that the Local Plan can be found sound. Framecourt Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 5.63. To overcome the objection and address soundness matters, the Council should: - Increase housing requirement to 1,100 to 1,300 dwellings over the plan period. - Reduce the potential from current commitments and include a non-delivery allowance. - Identify safeguarded land. - Allocate: Site 1019: Apy Hill Lane, Tickhill
Summary:
Concerned that the Local Plan is deficient in its content and evidence base and does not reflect national guidance. Consider the plan unsound. - The Local Plan housing requirement is not sufficient and is not fully aligned with forecast economic growth. - The Local Plan identifies significantly more employment land than the target for provision established in Policy 3. - There is a significant mismatch between the level of employment land allocated and the level of housing land allocated in the Plan period; and - The identified supply is not sufficient to meet the Councils identified requirement. Concerned with housing levels proposed (920 dpa / 13,230 over 15 years / 18,400 between 2015 - 35). Regeneris have carried out an assessment of this which concludes: - The target delivers the minimum level of housing need for Doncaster based on the standard method (585 dpa) and makes an upward adjustment to support economic growth. - The upward adjustment was based on evidence produced by PBA which recommended housing need is presented as a range between 585 dpa (the minimum) and 912 dpa. The upper limit was based on matching Jobs growth aspirations of the Sheffield City Region LEP (1,420) over the period 2016 to 2026. - However, PBA have made unjustified and unrealistic assumptions for a number of factors which all suppress the level of housing required to support future employment growth. In particular, we disagree with their assumptions about commuting, double jobbing and household formation rates. Regeneris considered that: - Doncaster has been one of the fastest growing economies in Yorkshire and Humber. The district has created around 24,000 jobs between 2000 and 2017, representing a growth rate of 1.1% p.a. - Doncaster's key asset is its connectivity by road, rail and air which has made it a highly attractive location for inward investment, particularly for industrial and logistics occupiers, with over 1.1m sq m of industrial/warehouse space taken up since 2010. - The strong performance is also due to a significant improvement in key economic indicators, including skills and levels of enterprise. The business start-up rate has more than doubled since 2010 and is now in line with the national average. These improvements have removed a key barrier to growth and mean that Doncaster is well placed to continue its high rate of growth. - The Local Plan has set a target of delivering 481 hectares of employment land between 2015 and 2035 and a number of ELR's shows there continues to be very strong market demand for industrial space in Doncaster. There is therefore strong potential for Doncaster to accommodate high levels of inward investment in future which would also drive jobs growth. Concerned that housing requirement does not match the employment requirement once economic growth and job formation is taken into account. A balance should be struck. The framework reaffirms government commitment to boost housing supply, including setting out that exceptional circumstances may justify an uplift from the standard method. NPPG is clear that the standard method is a minimum housing need figure and not a requirement. It is also clear the standard method does not fully address affordability issues. NPPG also says there are circumstances it will be necessary to plan for a higher figure than is identified and there are circumstances where it is appropriate to consider whether need is higher than the standard method suggests. This will need to be assessed prior to and separate from, considering how much of the overall need can be accommodated. Circumstances may be appropriate include situations where housing need may exceed past trends due to: - Growth strategies that are likely deliverable i.e. where funding is in place to facilitate extra growth; - Strategic infrastructure improvements that are likely to increase local housing need; - Taking on neighbouring authority need. - Where a SHMA indicates a need greater than the standard method, the Council need to recognised that housing brings economic benefits to the area, the right quality and balance of housing is necessary for economic growth. It can support jobs including construction and increase population and subsequently jobs through increased service demand. The HBF have proven the value of housebuilding to the economy in its report on "the economic footprint of housebuilding in England and Wales". This shows a healthy, well functioning labour market requires a good supply of housing that is affordable for local people and enables them to move jobs freely and match skills to employer demand. A dysfunctional market can inhibit mobility and stifle economic growth. Regeneris consider Doncaster's housing need to be 1,100 dpa to support future economic growth. It is clear the Council is trying to align housing and job growth, however it is not clear whether the council has considered additional jobs growth 2032 - 35. There is therefore potential for the jobs led scenario to underestimate jobs growth over the full plan periods. The associated uplift will not be sufficient to meet the full needs over the plan period. There is a discrepancy between the totals in paragraph 4.61 of the Plan and the figures arising from Tables E1 to E8. The sites that benefit from planning permission in tables E1 to E8 equate to 284.09 ha of employment land available within the Plan period. This leads to a total provision of 565.77 hectares of employment land against a requirement of 481 hectares. It should be noted that within the permissions identified in tables E1 to E8 that additional employment land is available, adding to the potential supply. There is therefore a significant mismatch between the level of planned employment provision in Policy 4 and the planned housing provision. Therefore, the housing requirement needs to be uplifted to reflect the identified level of employment land provision. Delivery in the last 3 years are significantly above the Local Plan target (3,211 in total), which is sufficient to support a requirement above 920dpa. The PBA report noted 1,073 would be required based on SEP ambitions, and that it would be prudent to plan for between 562 - 1,073. The employment growth proposal is noted in the ELNA as being ambitious but realistic, and that there has been significant growth over the last 15 years in line with SCR growth ambitions, with 2015 - 18 on target to meet 1% jobs growth. This supports a target at the higher end of the range. There is therefore evidence for a higher need for housing. NPPG is clear this should be taken into account in determining the housing requirement. 912dpa is not based on jobs growth over the full period. Further evidence is needed to demonstrate whether affordable housing can be met based on a target of 920dpa (209dpa or 23% affordable p/a). Affordable completions in the first 3 years have fallen below the identified need even when completions are higher than the plan proposes. Some areas will only deliver 15% and it may be unviable on some sites, so there is concern the need won't be met by 920dpa. To deliver it, 1,393 dpa would be required assuming the achievement of an average of 15% affordable housing - the highest achieved in the last 3 years. There should be a further uplift to the plan housing requirement to support economic ambitions and ensure sufficient affordable housing. The policy is not justified and is not consistent with the framework. The plan is therefore not sound. The requirement should be at least 1,100 dpa with a further uplift to ensure affordable needs can be met, up to 1,393 dpa. Housing supply and delivery: The approach to delivering housing does not reflect national guidance. The council is not demonstrating flexibility to ensure needs can be met in full. The framework is clear plans should be flexible. PPG is clear attention should be given to providing an adequate supply of land and that the plan should be realistic about what can be achieved and when. Authorities need to ensure policies setting out contributions do not undermine deliverability of the plan. At present based on the Councils figures presented in the Local Plan, a Plan requirement of 18,400 completions equating to 3400 and allocations equating to 16,055, there is a flexibility of around 1055 dwellings which equates to 5% of the Local Plan Requirement. This is insufficient given the potential for non-delivery and under delivery of sites, particularly from the dependency on a number of large sites. Concerned that policies may undermine the deliverability of sites or lead to further viability work. Concerns related to supply from completions, permissions and new allocations. The supply for completions is gross not net and should be 3,211, not 3,400. This would serve to increase the residual requirement based on an OAN of 920 to at least 15,189, and reduce the flexibility in the Plan to 866 dwellings (4.7%). The trajectory shows supply cannot be maintained over the plan period, with only 4 sites capable of delivery later in the plan period. The RLA 2019 is also unavailable so a whole years monitoring is absent. This should be updated. The council has assumed 100% delivery, but best practice guidance shows 10% discount rate should be applied to sites with permission (but this could vary). For 9,488 completions, at least 948 should be discounted, but this could be higher given constraint history on sites. Also concerned about the reliance on existing sites with permission, especially as many are brownfield with known constraints and viability concerns in market challenging areas. Some are also constrained by flood risk. Evidence of developer interest for each site is a fundamental requirement to provide confidence of delivery.
Concerns exist about: Site Ref: 838 Site Name: Henworth No. of Dwellings: 930 Framecourt Homes Comment: There have been a number of planning applications and proposed schemes over the years, but there has been no delivery on site. Countryside PLC have submitted a planning application, which the Environment Agency has objected to and recommends refusal. There is conflicting evidence in terms of delivery rates, with the Local Plan and the HELAA. There are significant flooding constraints affecting the site. No further deliverability evidence has been produced in the Doncaster 5 Year Deliverable Housing Land Supply Statement. The Residential Land Availability Study notes that at 31/03/2018 there were no completions and the site is not currently being developed. Site Ref: 843 Site Name: Manor Farm, Bessacarr No. of Dwellings: 1,009 Framecourt Homes Comment: This is a Persimmon / Charles Church scheme. However, delivery has become frustrated by the need to deliver infrastructure to complete development. Since there is only one developer on the site the development trajectory is likely to be modest and development of the site is unlikely to be achieved during the plan period. The Residential Land Availability Report indicates 39 completed in 17/18 which is below the rates expected in the Local Plan and HELAA. Which assumes delivery rates of around 70 dwellings a year. This is not realistic based on current delivery. Site Ref: 418 Site Name: Unity/DN7 Initiative No. of Dwellings: 905 Framecourt Homes Comment: The site has outline planning permission for 3,100 homes. No reserved matters have been submitted. The site is in significant multiple ownership and understand that CPO procedures will be employed to facilitate the delivery of requisite infrastructure. Homes England is also assigning public funding to support the development. Given the presence of multiple landowners, the need for considerable public funding, the likelihood of a protracted timeframe to open up the site for development and the absence of confirmed market interest, the site is unlikely to deliver the Council’s prediction of 1015 homes in the plan period. The HELAA does not anticipate a start on site until years 6 to 10. However the local plan indicates a 175 completions in the first five years. Higher rates of delivery are expected in the following years (70 dwellings per annum). These rates are overly optimistic especially when compared to annual completions for individual sites recorded in the residential land availability report. Site Ref: 569 Site Name: Askern Saw Mills No. of Dwellings: 220 Framecourt Homes Comment: This is a long standing, unimplemented planning permission that has been available but has remained undeveloped. There is no developer interest and consequently the assumed delivery of 220 new homes is optimistic. Indicated in the Residential Land Availability Report that the outline permission has lapsed. Site Ref: 984 Site Name: Former McCormick Tractors No. of Dwellings: 600 Framecourt Homes Comment: This site has significant constraints. There is an outline permission relating to the development of the site. The Local Plan assumes a delivery rate of 56 dwellings per in the first five years and 64 dwellings per annum in the following years. This is overly optimistic and not consistent with the planning status and constraints on site. Site Ref: 940 E1 and E2 Site Name: Land east of Poplar’s Farm No. of Dwellings: 280/920 Framecourt Homes Comment: Site 940 is allocated in the plan for development of up to 280 dwellings (Part E1), Part E2 is identified as a reserved housing site for up to 920 dwellings. This site does not form a true reserve site. The council have identified a release mechanism which restricts the release of housing to net additional jobs delivered at the airport. There is no allowance for demolitions, evidence is needed on this. Sites which are not available or unknown should not be included in the plan or a buffer should be provided due to uncertainty on delivery, including: Site Ref: 1028 Site Name: Tickhill No. of Dwellings: 74 Framecourt Homes Comment: This site does not have access, therefore cannot be considered to be deliverable. Further, the capacity of the site is unrealistic. This is a 1.5 hectare site, a capacity of 44 dwellings would reflect the assumptions on net to gross developable site area and density set out in the Viability Study. Site Ref: 662/247 Site Name: Colliery Site, Rossington No. of Dwellings: 897/237 Framecourt Homes Comment: The delivery rates on the site are overly optimistic. In 2017/18 there were only 49 completions on site 662. Assuming delivery rates based on past performance at this site then it is considered that only 600 dwellings will be capable of coming forward within the Plan period. This is significantly less than the 1127 homes forecast within the Plan. Site Ref: 081/343 Site Name: Thorne No. of Dwellings: 207 Framecourt Homes Comment: This is a longstanding allocation and there is little evidence available through the councils evidence base to demonstrate that there is developer interest or that the site will come forward in the short term. Site Ref: 795 Site Name: Thorne No. of Dwellings: 13 Framecourt Homes Comment: This site had permission which has since lapsed. There appears to be little developer interest in this site. The site is not considered to be deliverable. Site Ref: 510 Site Name: Thorne No. of Dwellings: 25 Framecourt Homes Comment: This is a narrow and constrained infill site, with railway forming the southern boundary of the site. There is little evidence available through the Councils evidence base to indicate any developer interest in the site. Site Ref: 165/186 Site Name: Carcroft No. of Dwellings: 300 Framecourt Homes Comment: This site is located to the western edge of the settlement and is relatively distant from the key services and facilities such as the train station, and employment opportunities. Other sites are located nearer to key services. An assessment of some allocations shows some proposals are at risk and hence why best practice suggests a buffer should be included. Also, sites with planning permission have been heavily relied on instead of identifying a sufficient supply of new allocations to meet the requirement. Consequently a number of sustainable settlements have insufficient allocations to meet their needs. There are also instances of unrealistic assumptions on gross to net developable site areas on the resultant yields from proposed allocations, especially concerning developer requirements. Further sites are required. The Council need a wider choice of sites across a number of different areas and market areas to gain market traction and increase build rates. There should be 30 - 35 building outlets operating across the borough for every year of the plan, and it is not believed the plan can deliver this, especially in the later plan years. Framecourt homes would be happy to work through specific sites in detail with the Council to reach agreement on the HELAA and building commitments. The framework notes they can only be considered deliverable when they have detailed planning permission. Outlines should only be considered with evidence that completions will begin within five years. Evidence for deliverability has tightened. The main risks to delivery are slippages in delivery of allocations, longer - lead in times, reduced housing capacity on sites and sites no longer coming forward as a result of viability from policy obligations. Greater flexibility is suggested. The Council should review existing commitments and ensure these are still deliverable - is there a house builder on board and are their constraints preventing development? Delivery rates should also be reviewed to see if they are appropriate, especially given policy obligations. Annual Housing Requirement Council Figures: 920 Framecourt Homes’s View: 1,100 Total Requirement (2015-2035) - which is 15 years post adoption Council Figures: 18,417 Framecourt Homes’s View: 22,000 Framecourt Homes’s View: 23,000 Council Figures: 3,400 Framecourt Homes’s View: 3,211 Total Commitments Council Figures: 9,488 Framecourt Homes’s View: 9,488 Non-Delivery Allowance (at least 10%) Council Figures: 948.8 Framecourt Homes’s View: 948.8 Total Allocations Council Figures: 6,567 Framecourt Homes’s View: 6,567 Total Supply Council Figures: 18,506 Framecourt Homes’s View: 18,317.2 Residual homes to be identified Council Figures: - 106.2 Framecourt Homes’s View: 3,682.2 3,682 new homes are needed on a best case scenario. This does not account for an uplift for affordable housing deliverable, which would lead to a requirement of 1,393 dpa and a plan requirement of 27,860 - which would mean a need for an additional 9,542 homes (including completions, commitments, 10% non implementation and allocations as proposed). These do not balance housing provision with additional employment allocations which mean 3,850 additional homes are required (1,292 dpa). Framecourt consider that 7,532 additional homes are required to The additional employment allocations need housing to balance with the allocations. The additional employment allocations amount to 83.77 hectares above the requirement, this is the equivalent of an additional 3.5 years supply of land. As a result in order to balance the housing provision with the additional employment supply circa 3850 additional homes would be required, this amounts to an annual requirement of 1292.5 dpa. Framecourt Homes consider circa 7,532 additional homes are required in order to balance the Housing with Employment supply, account for net completions and appropriate non-implementation rates. Employment requirement 2015-2035 Framecourt Homes’s View: 481 hectares Annual employment requirement Framecourt Homes’s View: 24 hectares Employment land developed 2015-2018 Framecourt Homes’s View: 117 Sites with planning permission Tables E1 to E8 Framecourt Homes’s View: 284.09 New employment allocations Policy 4 Framecourt Homes’s View: 164.65
Allocations Framecourt Homes's View: 565.77  Amount of land allocated over the requirement Framecourt Homes's View: 83.77  Additional homes required to balance with employment land supply Framecourt Homes's View: 3,850  Residual homes to be identified Framecourt Homes's View: 7,532.2  These figures assume no changes to the identified sites - although significant concerns about these have been flagged. This does not account for additional economic growth at the airport. Furthermore there are no safeguarded sites or genuinely developable reserve sites in the plan. Alternate safeguarded sites are needed that are not constrained by flood risk or HS2. The airport is strictly controlled and does not thus provide the required flexibility.  It is also evident the trajectory is optimistic. With an increased housing requirement, reduced potential from existing planning permissions sites and incorporation of a flexibility allowance, further land will need to be identified. Site 1019 - Apy Hill Lane - should be allocated.  Proposed change - to overcome and address soundness issues, the Council should: - Increase housing requirement to 1,100 to 1,300 dwellings over the plan period. - Reduce the potential from current commitments and include a non-delivery allowance. - Identify safeguarded land. - Allocate: Site 1019: Apy Hill Lane, Tickhill

Response:
The Peter Brett’s report assesses the employment and housing target for the borough and ties the two together to ensure the right amount of houses are provided for the projected growth. The Council are confident that this report provides a sound and realistic figure. Many ways have been submitted to the Council about how the housing and employment figures could be derived. The submission Local Plan included a range, but still plans for enough housing to meet the requirement of 920dpa over the plan period - the use of a range does not prejudice this. 920dpa is the assessed level of housing required under the revised NPPF, 1,073 refers to the figure using the previous NPPF, which is now redundant. It should also be noted the PBA report states a mid-way point between 585 and 920 could be used, which the Council elected not to do. The Local Plan is planning for 57% more housing than the Standard Methodology proposed, and in doing so the Council have taken on board national policy and guidance. The jobs requirement covers the period 2015 - 35, and enough housing is planned for to match this - there is no reason to uplift this further, including for affordable housing. There is additional flexibility in housing delivery, as the plan does not factor in to its calculations windfalls; sites of 1-4 units; any development in Defined Villages; the proposed 280 dwellings at the airport + possible 920 further linked to job delivery; and the potential of Reserve Development Sites to deliver housing. If all these are factored in, then there is a total potential supply of 24,880 + future windfalls and potential empty homes coming into use, which is 6,480 above the 20 year requirement of 18,400, or in effect a buffer of 35%. Trajectories and other matters raised or covered in the Housing Topic Paper. The RLA has been updated for 2019 now. Consideration has been given to site constraints and delivery, and factored in where appropriate - this is discussed in the Site Selection Methodology and Housing Topic Paper. With regards to site 1019, this is constrained by access issues and Green Belt. Please see the Site Selection Methodology and Green Belt Topic Paper.
Objection is made to this Policy. The level of housing growth for the Plan period 2015-2035 is set at 18,400 new homes. The Plan seeks to allocate land for 15 years of 13,230 new homes having deducted the completions from the first three years of the Plan period up to 2018. The Plan should allocate land for the complete Plan Period and on the basis of the Policy as drafted only takes account of 18 of the 20 year plan period. There is no explanation of the remaining 2 years. The housing requirement is set out as a range from 920 dwellings per annum, down to 882 dwellings per annum and indicates that this will be reviewed through the plan period to reflect updated projections and the need for affordable homes. It is unclear from the Plan on what basis revised requirements would be considered and how this would affect the land allocations or future requirements. The Policy as drafted is not clear if provision is being made for the entire 18,400 new homes or for a lesser figure. There is no clear explanation of this in the supporting text. Paragraph 4.38 of the text indicates that the requirement is 912 homes per year over the Plan Period, which is 18,240 new homes net. There is no explanation of the net and gross figures in the text. The Plan should clearly set out the gross requirement over the plan period, what deductions are made for completions, the residual requirement for the remainder of the plan period, and the allocations therefore made. Net and gross figures would assist the ability to understand the Plan. The range of figures in the table for the settlements in the hierarchy are difficult to match up with the overall requirements. The figures for the bottom end of the range add to 10,850 housing allocations and the top of the range add to 15,390, neither of which figures match the 13,230 in the first part of the Policy. The Plan is therefore unclear and imprecise about the housing allocation and how this is justified compared to the report relied upon which sets out the housing need. Paragraph 4.40 seeks to explain the distribution of the housing baseline figure and the economic growth housing figure. It sets out that not all of the baseline figure is allocated to the service function settlements and some 632 dwellings are then reallocated to the higher order settlements. These settlements already have the additional growth from the economic led housing. The distribution should be reapportioned as set out in our comments above to apportion the whole requirement of housing need to the sustainable settlements. The explanation in para 4.41 that 4,905 homes of the allocation requirement is directed to the urban area and main towns is misconceived for the reasons stated above. The plan does not explain how this has been worked out in exact allocations, and appears to be subject to interpretation by a future topic paper.

**Reason:**
We act for a number of major land owners in the Doncaster area, we have detailed knowledge of the sites and the planning history of the Borough. We have previously been involved with the Core Strategy Plan and with the Examination of the draft Sites and Policies DPD. Our knowledge of the various land parcels, ownerships, the strategic land position and specific details, means that we have information to inform the debate regarding the overall housing requirement and the specific allocation of sites which will assist the examination.

**Area:**
Chapter 4: Strategic Approach

**Tests of Soundness:**
- Positively prepared
- Effective
- Legally Compliant
- Justified
- Consistent with national

**Comment:**
Objects to policy. The plan should not deduct completions from the first 3 years of the plan period and allocate enough land for the whole plan period as the policy as drafted only accounts for 18 of the 20 years with no explanation of the remaining 2 years. Expressing the housing requirement as a range is not clear on what basis the revised requirements would be considered and how it would affect land allocations or future requirements. Not clear if provision is being made for the entire 18,400 new homes or for a lesser figure. Para 4.38 indicates the requirement is 912dpa over the plan period which is 18,240 new homes. The plan should set out the gross requirement over the plan period with deductions for completions, the residual requirement for the remainder of the plan period and the allocations therefore made. Net and gross figures would assist the ability to understand the plan. The range of figures in the table for settlements in the hierarchy are difficult to match up with the overall requirements. The bottom end of the range add up to 10,850 and the top of the range 15,390 neither of which match the 13,230 in the first part of the policy. The remaining 632 units from the baseline (Defined Villages) should be reallocated to all settlements in the top 3 tiers of the hierarchy rather than to just the Main Urban Area and Main Towns. The explanation in para 4.41 that 4,905 homes of the allocation requirement is directed to the urban area and main towns is misconceived for the reasons stated above. The plan does not explain how this has been worked out in exact allocations, and appears to be subject to interpretation by a future topic paper.
Sources of supply for the remaining 2 years of the plan period where allocations are not being made is identified including: supply at settlements with a housing allocation above their requirement; permissions from small sites 1-4 units as at April 2018; all permissions at the Defined Villages 5+ units as at April 2018; large sites still developing in these final 2 years; any housing in line with Policy 7 at the Airport (up to 1,200 new homes); and, any housing on Reserve Sites. Policy 6 provides further detail on the total size and sources of the allocated housing requirement which is 16,115 net dwellings with completions in addition to this for the first 3 years of the plan (3,400 net units) giving a plan period housing supply of 19,515 net dwellings against a requirement of 18,400 (+1,115 units). A further 2,085 units are allocated but estimated to deliver beyond 2035. The ranges provide flexibility when allocating sites and each settlement is not required to allocate to the top of the range in order for the overall housing requirement to be met hence adding the bottom and/r top of the ranges do not equal the overall requirement and hence the mid point figure within these ranges will reflect the overall requirement. The leftover baseline is considered appropriate to redirect to the top 2 tiers of the hierarchy given these are the most sustainable settlements with largest populations etc. To answer the specific points made:

- What is the overall requirement
  The plan period requirement (2015-2035)  18,400 net dwellings
  The residual plan period requirement (2018-2035)  13,235 net dwellings

- What is the actual allocation?
  Completions first 3 years of the plan period  3,400 net dwellings
  The plan period allocation 2018-2035  16,115 net dwellings
  Completions + plan period allocations  19,515 net dwellings (+1,115 net units compared to plan period requirement)

- Why is there a distinction between baseline housing growth and economic growth in distribution terms?
  See responses to Policy 2 for the distinction between the baseline and economic growth led housing distribution?

- What is going to each settlement and why?
  See response to Policy 2 as well as settlement figures set out in Chapter 16 which explains final housing allocations to each. Allocations should be listed in Policy 6 in a comprehensive table to enable a proper understanding and reading of the Plan.

- These are set out in Chapter 16 by settlement level as well as whether permissioned/non-permissioned already and would be unnecessary duplication. A plan of each site should also be included in the plan document, to ensure clarity about the site boundaries

- The majority of non-permissioned sites have a plan included in the Appendices (Developer Requirements) and detailed boundaries shown on the Policies Map.
Policy 3: Level & Distribution of Growth

The Employment Land Need and Demand Assessment undertaken by Knight Frank dated September is included within Appendix 3 and should be read alongside the comments set out below. We note and support the proposed delivery of at least 481 hectares of employment land over the plan period (2015-2035) at locations with good access to the M18/M180 motorways and strategic road network to help grow and diversify the Sheffield City Region economy, increase productivity and widen access to learning and training opportunities. This equates to just under 24ha (60 acres) per annum over the 20-year plan period. According to the Employment Land Need Assessment (2019 Update), the net land take collated from the 4-year period between 2015-2018 shows an average of 29.75ha (73 acres) per annum. From this, it is evident that recent demand for allocated employment land is outstripping the supply. We therefore consider that the Council should plan for additional employment land beyond this figure to enable flexibility and meet this rising need. According to the DMBC Employment Land Review 2018, since the year 2000, 483 ha (1,193 acres) of land has been developed in Doncaster and over half (56%) of this it attributable to distribution and logistics uses. Interestingly from 2016 and 2017 this figure rose to circa 63%. In line with a national trend for larger distribution units, it is considered that in order to keep up with current market occupier demand, large-scale sites need to cater for larger warehouses (grade A units of over 100,000 sq ft) on both a speculative and pre-let/sale basis to accommodate demand and the growing appetite of logistics operators and online retailers. Only 4 out of the 8 sites listed within the draft allocations could accommodate a building of this size and nature. We therefore feel that there is scope in Doncaster for a site such as Gateway 180 to be allocated as a major large-scale development option. The Peter Brett Associates (PBA) Economic Forecasts and Housing Needs Assessment June 2018 Report recommends that there should be an allowance for ‘frictional vacancy’ for example at any one time the plan provides for at least 5 year’s supply of immediately available and ‘deliverable’ employment land to mirror that for housing. According to the review contained within The Employment Land Need and Demand Assessment undertaken by Knight Frank dated September included within Appendix 3, the current allocation of large-scale employment land equates to approximately 6.26 years supply, (based on the Employment Land Review 2018 take-up figure of 70 acres (28ha) per annum), however a large proportion of this land is not immediately deliverable and will need infrastructure and further investment to allow development to proceed. Furthermore, we believe that the Riverside Park and Aero Centre developments are more suited and have historically attracted small to midbox occupiers rather than large-scale developments. With this in mind, it is our opinion that the currently available and deliverable supply will be far less. The report also suggests that it may be right for the Council to provide for land over and above the ‘job-led scenario’ if the Council aims to attract regional/national demand for strategic warehousing and to ensure that it’s ready to meet unexpected occupier requirements so that no opportunities for economic growth and job creation are missed. The suggested uplift is around 30%. We noted that the Local Plan Publication Draft (June 2019) indicates that in respect of the Unity scheme, only 33.6ha (83 acres) of the site will be developed out during the Plan period (2015-2035), leaving a residue of 22.6ha (55 acres) on a gross basis. In regard to iPort at Rossington, the Local Plan states that there is 158ha (390 acres), while our figures suggest that there is substantially less space remaining of 58ha (144 acres). The Employment Land Needs Assessment (2019 Update) concludes that the ‘Jobs-Led’ scenario has been selected for the Local Plan, which is considered “ambitious but realistic”. The Peter Brett Associates Economic Forecasts and Housing Needs Assessment (June 2018) suggests that the Local Plan must supply land to match the gross demand for new space, not only to accommodate the net growth but also to replace any existing space that will be lost. It concludes that this additional land area could be significant. According to our findings, based on the last six years of take-up concerning grade A units of above 100,000 sq ft only, we conclude that there is only 12 months of stock immediately on the market. It is important that DMBC allocate enough immediately deliverable ‘oven-ready’ land to satisfy both current and anticipated future demand. The ELNA identified of all land developed between 2005 and 2018, 73% was for B8 and B2 use with the majority of this land being developed in the areas of Balby Carr (18%), Armthorpe (9%), Redhouse (15%) Thorne (9%) and Rossington (17%) In our view this was heavily influenced by the oven ready status of these sites at the time allowing them to satisfy occupational demand swiftly along with their strategic locations being adjacent to the motorway corridors. We therefore consider that the Council need to provide new allocations which have premium motorway connections (including multi modal access), a scale and flexibility in their site layouts which are attractive to both the logistics and industrial property markets to ensure flexibility. These sites need to be ones where environmental and development constraints can either be avoided or appropriately mitigated. We also note the Thorne and Moorends Neighbourhood Plan (the TMNP) at Policy E2: Development of Non-Neighbourhood Plan Allocated Employment Sites which states: The allocation of sites along the M18 in the Doncaster Local Plan will be supported given the economic development, through the layout of proposals, to promote physical connectivity with Thorne and Moorends. (SEE SERVER FOR Appendices)
Summary:
Note and support the proposed delivery at least 481 ha of employment land over the plan period at locations along the M18/M180 motorways and strategic road network to grow and diverse the economy, increase productivity and widen access to learning and training opportunities. This equates to 24 ha per annum over 20 period while the ELNA (2019 update) states that the net land take for the 4 year period (between 2015-2018) shows an average of 29.75ha per annum. It is therefore evident that recent demand for employment land is outstripping the supply. The Council should plan for additional employment land to enable flexibility and to meet this rising demand. In order to keep up with current market occupier demand, large-scale sites are needed to cater for larger warehouses and only 4 out of the 8 allocations could accommodate a building of over 100,000 sq ft. There is scope in Doncaster for a site such as Gateway 180 to be allocated. The Employment Land Need and Demand Assessment (undertaken by Knight Frank - Appendix 3) says that the current allocation of large scale employment land equates to approx 6.26 years supply. However a large proportion of this is not immediately deliverable and needs infrastructure and further investment. Also Riverside Park and Aero Centre developments are more suited to small to mid box occupiers. Therefore the currently available and deliverable supply is far less. The Knight Frank report (Appendix 3) also suggest that the Council should provide for land over and above the ‘job led scenario’ in order to attract regional/national demand for strategic warehousing and ensure that opportunities for economic growth and job creation are not missed. The suggested uplift is around 30%. Based on the last six years of take up for grade A units (above 100,00 sq ft) there is only 12 months of stock immediately available on the market. It is important that the Council allocates enough immediately deliverable ‘oven ready’ land to satisfy both current and anticipated future demand. The Council needs to provide allocations in locations with premium motorway connections, a scale and flexibility in their site layouts which are attractive to both logistics and industrial property markets to ensure flexibility.

Response:
Noted. No change required. Section 6 of the ELNA explains how the employment land need figure has been calculated i.e. additional factors such as competition and choice have been taken into account in the final figure. There is also an Employment Land Supply Buffer Note which explains this in more detail. There is no need therefore for additional land to be provided. The Economic Forecasts and Housing Needs Assessment suggests that 193 ha is a starting point for the employment land requirement. The Council’s Employment Land Need Assessment methodology increases this to 481 ha which is considered realistic and ambitious. There is also a variety of sites across the borough which aims to meets differing needs and not just warehousing.
3.1 Whilst we support the employment land target of Policy 3, we object to the omission of an employment land supply buffer or any reserve employment sites within the Local Plan to minimise the risk that the ‘minimum’ 481 hectare target is not met, and to ensure that the plan is sufficiently flexible to adapt to unforeseen circumstances. 3.2 Para 11 of the Presumption in Favour of Sustainable Development section of the NPPF requires that plans should be sufficiently flexible to adapt to rapid change. Para 81, within the Economy section of the Framework, echoes this requirement and states that policies should be flexible enough to accommodate needs not anticipated in the plan; to allow for new and flexible working practices; and to enable a rapid response to changes in economic circumstances. 3.3 In this context we are concerned that as drafted the Local Plan is insufficiently flexible and also ill-equipped to adapt to economic change that will inevitably occur over the 20-year plan period. Our particular concerns about the flexibility and durability of the Plan are as follows: 1. As explained in our associated comments on Policy 4 of the Local Plan, there is no buffer or flexibility (other than a very small 1-hectare (0.2%) surplus) should any of the various employment sites that the Council have included in the Plan not deliver at the pace anticipated. The attached Dove Haigh Phillips assessment of employment site options (Appendix 2) demonstrates that a delivery shortfall is very likely to occur in relation to Sites 878/1032, 001, 941 and 441 - amounting to almost 80 hectares of land. Dove Haigh Phillips also advise that in respect of employment sites with planning permission, which make up 201 hectares (42%) of the employment land supply, it is advisable to allow for a modest slippage rate of 10% due to unforeseen constraints. This would amount to a further potential 20 hectare delivery shortfall. 2. The attached Hatch Regeneris report (Appendix 1) shows that Doncaster has one of the fastest growing economies in the north of England, with a significantly higher GVA than the national or regional average. Industrial space leased in Doncaster since 2009 represents 37% of demand in South Yorkshire, despite the area only accounting for 20% of the South Yorkshire population. However, in the event that there is an unforeseen requirement for an additional large employment site to be provided over the plan period, consistent with Doncaster’s success, for example to meet a requirement for a high profile investor seeking a site with good access to the motorway network, this would inevitably involve the use of either Green Belt or defined Countryside because there are no opportunities close to the motorway network that would not utilise such land. The Countryside and Green Belt policies of the Plan would not readily allow for such a need to be met on a windfall basis, which would mean that Doncaster would lose out to footloose investors seeking employment opportunities that cannot be met by the limited new allocations of the Plan. A development within the Green Belt could not take place until a plan review had taken place, by which time an investor would be likely to look for opportunities in other Local Authority Areas. Policy 26 of the Plan only permits a ‘rural’ enterprise to be developed in the defined Countryside. 3. The Local Plan presently provides for significant flexibility in the housing supply, as shown at Page 44 of the plan - a 7% buffer above the residual allocation requirement; 585 dwellings with permission not included in the allocation supply; 1,345 dwellings on reserve housing sites; and windfalls, which will be additional to the allocated supply. However, there is no such buffer or reserve site allowance made for employment land to address the deliverability and flexibility concerns we identify above. This is an inconsistent approach. 4. Although Table 9.31 of the Housing and Employment Site Selection Methodology refers to a number of unimplemented UDP Employment allocations, we do not consider that these sites represent a reserve source of employment land that can be relied on to address the concerns we identify in this objection. Firstly, any allocation that is still available now, some 21 years after allocation of the UDP, is likely to be constrained by physical or ownership issues or be located in an unattractive location for development. Secondly, most of these sites are very modest in size and therefore unsuitable for anything but localized business needs (the Local Plan acknowledges that five of the sites are within a defined Employment Policy Area and they do not contribute to the total amount of employment land). Thirdly, a number of the sites are proposed (in part or whole) to be re-allocated for housing use. 5. The Doncaster UDP provided for a number of reserve employment sites to address the very flexibility points we have identified, thus highlighting the inconsistency in not applying a similar approach in the new Local Plan. Para 4.21 of the UDP states: “4.21 The provision of land within the UDP for employment purposes is likely to be more than adequate to meet anticipated future needs. However, in order to provide additional flexibility for the future in the event that demand proved to be higher than expected, or for example, if a need was identified for an extensive site for a single large operator that could not be accommodated on existing allocated sites in the borough, then the land previously earmarked for Phases 3 and 4 of Carcroft Industrial Estate and north of Cassons Road could be released for this purpose.” The policy associated with Para 4.21 of the UDP, Policy EMP3, safeguarded two large reserve employment sites amounting to approximately 80 hectares of land, as shown below: EMP 3 THE FOLLOWING LAND WILL REMAIN IN ITS PRESENT USE DURING THE PLAN PERIOD OR UNTIL SUCH TIME AS IT MAY BE REQUIRED FOR EMPLOYMENT PURPOSES IF DEMAND FOR EMPLOYMENT LAND EXCEEDS SUPPLY OF OTHER EMPLOYMENT LAND IN THE BOROUGH OR THERE IS A NEED TO PROVIDE A SITE FOR A SINGLE LARGE OPERATOR WHICH COULD NOT BE ACCOMODATED ON OTHER EMPLOYMENT SITES IDENTIFIED IN THE PLAN: 1) PHASES 3 AND 4 OF CARCROFT INDUSTRIAL ESTATE 54.3 HA 2) LAND NORTH OF CASSONS ROAD, THORNE 26.4 HA. 3.4 In the light of the above, we do not consider that Policy 3 is positively prepared, justified, effective or consistent with national policy. 3.5 Without prejudice to our client’s associated representation to Policy 4 seeking allocation of West Moor Park East (Site 937/1031/938/1014) for employment, we consider that site should be identified as a reserve employment site in the event that the former request is not accepted to bolster the employment land supply and address the flexibility concerns we set out in this representation. (SEE SUPPORTING DOCS for Appendices)
Summary:
Object to the omission of an employment land supply buffer or any reserve employment sites to minimise the risk of the 481 ha target not being met and to ensure that the plan is sufficiently flexible to adapt to unforeseen circumstances. NPPF (para 11) states that plans should be sufficiently flexible to adapt to rapid change, this is echoed in para 81. There is concern that the Local Plan is insufficiently flexible and ill-equipped to adapt to economic change that will occur over the plan period. The particular concerns are: 1. There is no buffer or flexibility (other than 1 ha). the Dove Haigh Phillips assessment (attached as an appendix) demonstrates that a delivery shortfall is likely to occur in relation to sites 878/1032, 001, 941 and 441 amounting to almost 80 ha of land. The report also states that a modest amount of slippage should be factored in for sites with planning permission not delivering as expected. This would be a further potential of 20 hectares of shortfall. 2. The Hatch Regeneris report shows that Doncaster has one of the fastest growing economies in the north. Industrial space leased in Doncaster since 2009 represents 37% of demand in South Yorkshire. If there is an unforeseen requirement for a high profile investor seeking a site with good access to the motorway, it would involve the use of countryside or Green Belt. The relevant policies of the plan do not allow for a need to be met on a windfall basis. Policy 26 only permits a ‘rural’ enterprise to be developed in the Countryside. 3. The Local Plan provides for flexibility in the housing supply as shown on page 44 of the plan. But there is no such buffer or reserve site allowance made for employment land. This is an inconsistent approach. 4. Table 9.31 of the Site Selection Methodology refers to a number of unimplemented UDP employment allocations but it is not considered that these represent a reserve source of employment land that can be relied upon. Any allocation that is still available after 21 years is likely to have constraints and be in an unattractive location. They are also modest in size and unsuitable for anything other than localised business needs. 5. The UDP provided for a number of reserve sites to address the flexibility requirements which demonstrates inconsistency in the new Local Plan. It is considered that Policy 3 is not positively prepared, justified, effective or consistent with national policy. West Moor Park East should be identified as a reserve employment site (if it is not allocated in the first instance). This would bolster the employment land supply and address flexibility concerns.

Response:
Noted. No change required. Section 6 of the ELNA explains how the employment land need figure has been calculated i.e. additional factors such as competition and choice have been taken into account in the final figure. There is also an Employment Land Supply Buffer Note which explains this in more detail. There is no need therefore for additional land to be provided. The Economic Forecasts and Housing Needs Assessment suggests that 193 ha is a starting point for the employment land requirement. The Council’s Employment Land Need Assessment methodology increases this to 481 ha which is considered realistic and ambitious.
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**Comment:**

1. This representation supports the 481 hectare employment land target set out in Policy 3 of the Local Plan. However, it objects to the absence of an employment land buffer or any reserve employment sites.

1.2 The representation should be read in conjunction with the attached review of the Council's employment land evidence by Hatch Regeneris (Appendix 1); the attached assessment of employment site options by Dove Haigh Phillips (Appendix 2) and our client's objection to Policy 4 of the Local Plan. (SEE SUPPORTING DOCS for Appendices)

**Summary:**

This representation supports the 481 ha employment land target in Policy 3 but objects to the absence of an employment land buffer or any reserve employment sites.

**Response:**

Noted. No change required. Section 6 of the ELNA explains how the employment land need figure has been calculated i.e. additional factors such as competition and choice have been taken into account in the final figure. There is also an Employment Land Supply Buffer Note which explains this in more detail. There is no need therefore for additional land to be provided.
Comment Ref: C/Policy 3: Emp Target/05197/1/012

Attend Examination: Attend Hearing

Reason: We have compiled a detailed submission which is underpinned by a number of technical and evidence-based studies. We consider that it will be necessary to discuss this evidence with Officers and the Inspector at the Examination.

Area: Chapter 4: Strategic Approach

Policy: Policy 3: Level & Distribution of Growth

Tests of Soundness: Positively prepared Effective

Justified Consistent with national

Comment:

2.1 Blue Anchor Leisure supports the requirement of Policy 3 of the Local Plan that the plan should facilitate the delivery of at least 481 hectares of employment land over the plan period (2015-2015). 2.2 The attached assessment of the Employment Land Need Assessment Update 2019 (ELNA) that underpins the 481 hectare target by Hatch Regeneris (Appendix 1) demonstrates that: - The 481 hectares is based on jobs growth of 1% p.a. This is consistent with past trends in Doncaster and the Sheffield City Region’s growth aspirations. - The target uses the same jobs growth assumptions as the housing-based assessment and therefore represents a joined-up approach. 2.3 Hatch Regeneris also find that the breakdown between different use classes estimated in the ELNA is broadly in line with past trends and therefore found to be sound. This shows that a large share of the requirement for employment land is for strategic warehousing, as illustrated below: - 14 Ha for office development; - 125 Ha for industrial; - 73 Ha for non-strategic warehousing; and - 271 Ha for strategic warehousing. 2.4 In the light of the above we conclude that employment land requirement set out in Policy 3 is sound. There is no justification for a lower employment land target. (SEE SUPPORTING DOCS for Appendices)

Summary:

Support the requirement of Policy 3 that the plan should facilitate the delivery of at least 481 ha of employment land over the plan period. The Hatch Regeneris report (appended to the representation) demonstrates that - The 481 hectares is based on jobs growth of 1% p.a. This is consistent with past trends in Doncaster and the Sheffield City Region’s growth aspirations. - The target uses the same jobs growth assumptions as the housing-based assessment and therefore represents a joined-up approach. The report also finds that the breakdown between use classes estimated in the ELNA is broadly in line with past trends and is therefore sound. It is considered that the employment land requirement in Policy 3 is sound and there is no justification for a lower land target.

Response:

Support for Policy 3 is welcomed.
We have compiled a detailed submission which is underpinned by a number of technical and evidence-based studies. We consider that it will be necessary to discuss this evidence with Officers and the Inspector at the Examination.

Tests of Soundness:
- Positively prepared
- Effective
- Justified
- Consistent with national

Summary:
The Local Plan should include a buffer of employment land or identify reserve employment sites. Consider that West Moor Park East should be identified as a reserve site if it is not allocated in the first instance.

Response:
Noted. No change required. Section 6 of the ELNA explains how the employment land need figure has been calculated i.e. additional factors such as competition and choice have been taken into account in the final figure. There is also an Employment Land Supply Buffer Note which explains this in more detail. There is no need therefore for additional land to be provided.
Comment Ref: C/Policy 3/05203/1/001

Attend Examination: Attend Hearing

Reason: To allow participation in discussion regarding distribution of development, site selection and allocations.

Area: Chapter 4: Strategic Approach

Policy: Policy 3: Level & Distribution of Growth

Tests of Soundness:

Justified

Comment:

Please see attached statement which provides full explanation and justification for Harworth Group’s objection to the Publication Version Local Plan in relation to Conisbrough & Denaby, which comprises the following points:

1. Policy 3 ‘Level and Distribution of Growth’ fails to satisfactorily direct light industrial, manufacturing and small scale distribution to the Main Towns, and in particular those in the west of the borough. Given the above, it is considered that Publication Draft Local Plan does not meet the tests of soundness insofar as it must be justified on the basis of evidence and represent an appropriate strategy when considered against other reasonable alternatives. A ‘reasonable alternative’ which represents a more sustainable and preferable form of development is put forward by Harworth Group and described in the attached statement. Suggested changes to the Plan that are required to achieve this preferable ‘reasonable alternative’ are summarised below.

PROPOSED CHANGE Please see attached statement which provides full explanation and justification for Harworth Group’s suggested changes to the Publication Version Local Plan in relation to Conisbrough & Denaby which are summarised below. These changes are required to ensure that the Plan is justified on the basis of evidence and represent an appropriate strategy when considered against other reasonable alternatives. Policy 3 should be amended to include within the table a criterion to facilitate allocation of further land for employment use which is well located in relation to the existing urban area of the Main Towns, as follows:

- Location: Employment - Light Industry & Manufacturing: Rail and transport links and road connectivity. There is also capacity on Denaby Industrial Estate.
- Policy 3 should be amended to include within the table an appropriate strategy when considered against other reasonable alternatives.
- Policy 3 should be amended to include within the table a criterion to facilitate allocation of further land for employment use which is well located in relation to the existing urban area of the Main Towns, as follows:

- Location: Employment - Light Industry & Manufacturing: Rail and transport links and road connectivity. There is also capacity on Denaby Industrial Estate.

2. Policy 3 ‘Level and Distribution of Growth’ Fails to satisfactorily direct light industrial, manufacturing and small scale distribution to the Main Towns, and in particular those in the west of the borough. Given the above, it is considered that Publication Draft Local Plan does not meet the tests of soundness insofar as it must be justified on the basis of evidence and represent an appropriate strategy when considered against other reasonable alternatives. A ‘reasonable alternative’ which represents a more sustainable and preferable form of development is put forward by Harworth Group and described in the attached statement. Suggested changes to the Plan that are required to achieve this preferable ‘reasonable alternative’ are summarised below.

PROPOSED CHANGE Please see attached statement which provides full explanation and justification for Harworth Group’s suggested changes to the Publication Version Local Plan in relation to Conisbrough & Denaby which are summarised below. These changes are required to ensure that the Plan is justified on the basis of evidence and represent an appropriate strategy when considered against other reasonable alternatives. Policy 3 should be amended to include within the table a criterion to facilitate allocation of further land for employment use which is well located in relation to the existing urban area of the Main Towns, as follows:

- Location: Employment - Light Industry & Manufacturing: Rail and transport links and road connectivity. There is also capacity on Denaby Industrial Estate.

3. Policy 3 should be amended to include within the table a criterion to facilitate allocation of further land for employment use which is well located in relation to the existing urban area of the Main Towns (Hatfield Power Park and associated business parks) Table 4 (as referenced from Policy 4) should be amended to include the allocation of land at Conisbrough & Denaby for employment development as follows:

- Table 4: Employment Site

allocations Ref: 001 Address/Location: Junction 6 M18, Thorne North Gross site area (Ha): 73.63 Area available for employment use (ha): 73.63

Ha to be developed in plan period: 51.54 Ref: 092 Address/Location: Balby Carr Gross site area (Ha): 11.25 Area available for employment use (ha): 11.25

Ha to be developed in plan period: 8.60 Ref: 258 Address/Location: Site 1, Middle Bank, Balby Gross site area (Ha): 8.48

Area available for employment use (ha): 5.00 Ha to be developed in plan period: 5.00

Ref: 441 Address/Location: Land at Carcroft Common, Carcroft Gross site area (Ha): 49.28 Area available for employment use (ha): 24.64

Ha to be developed in plan period: 12.32 Ref: 491 Address/Location: RHADS Site 1, Phase 4 Business Park Gross site area (Ha): 68.54 Area available for employment use (ha): 68.54

Ha to be developed in plan period: 17.68 Ref: 1032 Address/Location: Bankwood Lane, Rossington Gross site area (Ha): 17.68 Area available for employment use (ha): 17.68

Ha to be developed in plan period: 17.68 Ref: 1035 Address/Location: Land at Eland Road, Denaby Main Gross site area (Ha): 4.2 Area available for employment use (ha): 4.2

Ha to be developed in plan period: 4.2 [plus other sites as appropriate] The following changes should be made to the site allocations and land designations as shown on the Policies Map: Site 1035 should be removed from Green Belt and allocated for employment (in part 4-2.2 ha) and housing development (in part 7.3 ha) with the settlement boundary adjusted to suit. Development of this site would deliver c.7,000 sqm of employment space and up to approximately 200 houses. Site 383 (in its current form) should be reallocated for housing and instead designated as Green Belt; open space, sports and recreation; and as a local wildlife site. Site 040 (in its current form) should be omitted as a housing allocation and retained as Green Belt. To fully meet local housing need, the Council should consider identifying further land at Conisbrough & Denaby for housing which may be in the form of a reduced extent of site 040 and/or 383 (i.e. that preserves the biodiversity/amenity function and limits green belt incursion) or other suitable site. Accordingly, Table H2(D) of the Publication Version Local Plan should be amended as follows:

- Table H2(D): Allocations without planning permission (as at 1st April 2018): (SITE 040 AND 383 SHOWN AS STRIKE THROUGH BUT CANNOT BE SHOWN) Site Ref: 1035 Address: Land off Hill Top Road, Denaby Main Site area (Ha): 7.3 Indicative Capacity (No of houses): 200 Achievability (deliverable & developable) - 0-5 Yrs: 0 5-10 Yrs: 200 11-15 Yrs: 0 15-17 Yrs: 0 Beyond Plan Period: 0 Site Ref: Address: [Reduced extent of site 040 or 383 or other suitable site] Site Area (Ha): Indicative Capacity (No of houses): 125 Achievability (deliverable & developable) - 0-5 Yrs: 0 5-10 Yrs: 0 11-15 Yrs: 125 15-17 Yrs: 0 Beyond Plan Period: 0 TOTALS: Indicative Capacity (No of houses): 325 Achievability (deliverable & developable) - 0-5 Yrs: 0 5-10 Yrs: 200 11-15 Yrs: 125 15-17 Yrs: 0 Beyond Plan Period: 0

Summary: RRe Policies and Site 1035 (Hill Top Denaby - Rejected Housing Site) Policy 3 ‘Level and Distribution of Growth’ Fails to satisfactorily direct light industrial, manufacturing and small scale distribution to the Main Towns, and in particular those in the west of the borough. Policy 3 should be amended to include within the table a criterion to facilitate allocation of further land for employment use which is well located in relation to the existing urban area of the Main Towns (includes suggested table amendments)

Response:

The Local Plan is not allocating employment specifically to any settlement. The Green Belt Topic Paper explains why there are no employment allocations within the Green Belt at this time i.e. it is considered that there are currently no exceptional circumstances. The explanatory text of Local Plan Policy 3 also explains that there is access to business parks across the border in Rotherham. These can be accessed using strong public transport links and road connectivity. There is also capacity on Denaby Industrial Estate.
5.1. Avant Homes is concerned that the Doncaster Local Plan Draft Policies and Proposed Sites is deficient in its content and evidence base and does not reflect national guidance. Test of Soundness 5.2. Avant Homes considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 5.3. Avant Homes have a number of concerns in relation to the Level and Distribution of Growth. The concerns relate to the following: - The Local Plan housing requirement is not sufficient and is not fully aligned with forecast economic growth. - The Local Plan identifies significantly more employment land than the target for provision established in Policy 3. - There is a significant mismatch between the level of employment land allocated and the level of housing land allocated in the Plan period; and - The identified supply is not sufficient to meet the Councils identified requirement. Need 5.4. Avant Homes is concerned with the proposed level of new housing being planned for in the Local Plan. Policy 3 makes provision for 18,400 dwellings to be delivered between 2015 and 2035, equivalent to 920 net new homes each year. Policy 3 states that there should be sufficient allocations for 15 years supply, which is 13,230 new homes. 5.5. Avant Homes has commissioned Regeneris Consulting to review the OAN and the Economic Forecasts and Housing Needs Assessment (2018). The Regenris report is attached to these representations. Regeners conclude that: - The target delivers the minimum level of housing need for Doncaster based on the standard method (585 dpa) and makes an upward adjustment to support economic growth. - The upward adjustment was based on evidence produced by PBA which recommended housing need is presented as a range between 585 dpa (the minimum) and 912 dpa. The upper limit was based on matching Jobs growth aspirations of the Sheffield City Region LEP (1,420) over the period 2016 to 2026. - However, PBA have made unjustified and unrealistic assumptions about commuting, double jobbing and household formation rates. (SEE EMAIL FOR Regeners Report) 5.6. Regeners consider that: - Doncaster has been one of the fastest growing economies in Yorkshire and Humber. The district has created around 24,000 jobs between 2000 and 2017, representing a growth rate of 1.1% p.a - Doncaster's key asset is its connectivity by road, rail and air which has made it a highly attractive location for inward investment, particularly for industrial and logistics occupiers, with over 1.1m sq m of industrial/warehouse space taken up since 2010. - The strong performance is also due to a significant improvement in key economic indicators, including skills and levels of enterprise. The business start-up rate has more than doubled since 2010 and is now in line with the national average. These improvements have removed a key barrier to growth and mean that Doncaster is well placed to continue its high rate of growth. - The Local Plan has set a target of delivering 481 hectares of employment land between 2015 and 2035 and a number of ELR's shows there continues to be very strong market demand for industrial space in Doncaster. There is therefore strong potential for Doncaster to accommodate high levels of inward investment in future which would also drive jobs growth. 5.7. Avant Homes have concerns that the proposed housing requirement does not represent an appropriate figure once consideration is given to the potential for economic growth and job formation. Avant Homes continue to consider that an appropriate balance should be sought between employment growth aspirations and the provision of homes. 5.8. The Framework (2019) reaffirms the Governments' commitment to 'significantly boosting the supply of homes' and states that 'it is that a sufficient amount and variety of land can come forward as it is needed, that the needs of groups with specific housing requirements are addressed'. It goes on to state 'to determine the minimum number of homes need, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify and alternative approach which also reflects current and future demographic trends and market signals'. 5.9. NPPG is clear that the standard method identifies a minimum annual housing need figure and that it does not produce a housing requirement figure. Paragraph 002 Reference ID: 2a-002-20190220. It is also clear that the affordability adjustment within the standard methodology is just to ensure that the minimum housing needs starts to address affordability of homes. It therefore does not fully address affordability issues. Paragraph 006 Reference ID: 2a-006-201902020. 5.10. NPPG goes on to identify the circumstances when it is appropriate to plan for a higher housing need figure than the standard methodology identifies. The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provide the minimum starting point in determining the number of homes needed in an area?It does not predict the impact of future government policies, changing economic circumstances or other factors that might have an impact on demographic behaviour. Therefore there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicate. 5.11. This will need to be assessed prior to and separate from, considering how much of the overall need can be accommodated. Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: 5.12. Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth 5.13. Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; 5.14. An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground. 5.15. There may, occasionally be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced SHMA) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need that the standard model suggests'. Paragraph 010 Reference ID: 2a-010-20190220. 5.16. The Council need to recognise that the development of new housing will bring forward additional economic benefits to the area. The relationship between economic performance in an area and housing is complex, but having the right quantity, quality and balance...
of housing in an area is necessary for economic growth. The development of new housing can therefore support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population which will create local jobs from the increased demand for goods and services. This provides an important sustainable development opportunity for Doncaster. 5.17. Importantly the HBF released in July 2018 its report on "the economic footprint of house building in England and Wales", which shows that house building in England and Wales is now worth #38bn a year and supports nearly 700,000 jobs. House building activity contributes economically in different ways including providing jobs, tax revenue and contributing funding for local infrastructure and communities. House building supports the economic in a wider sense through being drive for economic growth; delivering jobs and economic value; supporting labour market mobility; creating skills and employability; enhancing place competitiveness; creating quality of place and reusing brownfield land. 5.18. An important conclusion of the report and the wider economic benefits is that a healthy, well-functioning labour market requires a good supply of housing that is affordable for local people to enable them to move jobs freely and match up skills supply with employer demand. A dysfunctional housing market can inhibit labour market mobility, in turn stifling economic growth. 5.19. Regeneris consider that Doncaster’s housing need over the plan period should be 1,100 dpa to support future economic growth. Regeneris consider that the target of 920 dpa would risk constraining the future economic growth of Doncaster. 5.20. Furthermore, it is evident that the council are seeking to align economic growth with housing growth and have identified provision above the local housing need figure to which the council considers accounts for Job Led growth. However, the jobs led growth figure is based on jobs growth forecast between 2015-2032. It is not clear whether consideration has been given to the additional job growth expected to the end of the plan period. Therefore Avant consider there is potential for the jobs led scenario to underestimate the jobs growth over the full plan period. The associated uplift to the housing requirement will therefore not be sufficient to meet the full needs over the plan period. 5.21. Additionally, the Council have identified a requirement for 481 hectares of employment land based on the Job Led scenario, and accounting for the extended plan period between 2032 and 2035. The explanatory text considers that this requirement is met through 117 hectares of land developed between 2015-2018, 201 hectares of land benefiting from planning permission, and 164 hectares of allocated sites. However, there is a discrepancy between the totals in paragraph 4.61 of the Plan and the figures arising from Tables E1 to E8. The sites that benefit from planning permission in tables E1 to E8 equate to 284.09 ha of employment land available within the Plan period. This leads to a total provision of 565.77 hectares of employment land against a requirement of 481 hectares. It should be noted that within the Plan period and the figures arising from Tables E1 to E8 that additional employment land is available, adding to the potential supply. There is therefore a significant mismatch between the level of planned employment provision in Policy 4 and the planned housing provision. Therefore, the housing requirement needs to be uplifted to reflect the identified level of employment land provision. 5.22. As stated above NPPG indicates that consideration can be given to delivery rates, for the last three years completions have been consistently higher than the proposed local plan target. Net completions amount to 3211 dwellings, with annual completions as follows: Year: 2015-16 Net Completions: 1,025 Year: 2016/17 Net Completions: 1,049 Year: 2017/18 Net Completions: 1,137 Year: Total Net Completions: 3,211 5.23. This demonstrates that there is sufficient demand to support a requirement above 920 dwellings per annum. 5.24. The Councils Economic Forecasts and Housing Needs Assessment (PBA, 2018) considers the housing requirement prior against both the standard methodolgy, standard methodology with an uplift for economic growth and previous approach for identifying housing need. Following the earlier approach, PBA consider that an aspirational job led figure, based on the SEP ambitions, would equate to a requirement of 1,073. PBA considered that it would be prudent to plan for between 562 and 1073. To ensure that the requirement was realistic. It is worthy of note that the Employment Land Needs Assessment (2019). Considers that the Job led scenario was ambitious but realistic and notes the significant growth in Doncaster within the previous 15 years in line with SCR growth aspirations. And further the evidence of land take up and jobs growth for the period 2015-2018 was on target to meet 1% jobs growth per annum. This would support a target at the higher end of the range. 5.25. There is therefore evidence of both delivery at a higher rate and recently updated evidence that indicates a higher need for housing. As stated above NPPG is clear that this evidence should be taken into account when determining the housing requirement. 5.26. When using the standard method the housing need figure was 585, applying a job led figure to match the SEP led to a requirement of 912 (PBA, 2018). However this is not based on the Jobs growth over the full plan period. 5.27. Avant Homes consider further evidence is required to demonstrate whether the affordable housing needs of Doncaster can be met based on a target of 920. The explanatory text states that the current need for affordable housing, 209 affordable units, represents 23 % of the Local Plan requirement for housing. Paragraph 6.9 states that this does not take into account current completions or viability. The completions affordable requirements for the last three years (first three years of the Local Plan) are as follows: Year: 15/16 Affordable Completions: 151 Total Completions: 1,088 Affordable completions (%): 13.88 Year: 16/17 Affordable Completions: 161 Total Completions: 1,067 Affordable completions (%): 15.09 Year: 17/18 Affordable Completions: 166 Total Completions: 1,208 Affordable completions (%): 13.74 5.28. The total affordable completions falling below the identified affordable need, even when total completions are higher than the proposed Local Plan requirement of 920. Further, Policy 8 identifies a requirement for 23% affordable housing in high/medium value areas and 15% in low value areas. An as indicated in response to Policy 8 and Policy 67, this is demonstrated to be unviable for a number of sites, including all types of sites in low value areas. Avant Homes are therefore concerned that a target of 920 dwellings will not deliver sufficient number and range of affordable homes to meet the identified need for affordable homes in the Borough. In order to deliver 209 affordable dwellings per year, a requirement of at least 1,393 would be required. This assuming the achievement of an average of 15% affordable housing, which represents the highest achieved over the last three years of monitoring. 5.29. Avant Homes consider that there is sufficient evidence to point to the need for further uplift in the Local Plan housing requirement, based on the significant mismatch between housing and employment land allocations, the need to support the local plans economic ambitions, evidence of delivery and the need to ensure sufficient delivery of affordable housing. 5.30. Avant homes consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with the Framework the Plan do not consider the jobs led within the Local Plan in its current form to be sound. 5.31. However, Avant Homes consider that with a higher requirement, of at least 1,100 to meet the economic growth aspirations, and further uplifts to balance housing allocations with the employment land allocations, and to ensure that the needs for affordable homes can be met (up to 1393) that the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan Housing Supply and Delivery. 5.32. Avant Homes is concerned that the Council’s approach to delivering the housing requirement does not appear to reflect national guidance. 5.33. The Council is not demonstrating sufficient flexibility in the supply of housing land to ensure that the Plan can meet identified needs in full. The Framework is clear that plans should be sufficiently flexible to adapt to rapid change, and emphasises the importance of ensuring that a sufficient amount and variety of land can come forward where it is needed. 5.34. PPG is clear that careful attention should be given to providing an adequate supply of land, and the Plan needs to be realistic about what can be achieved and when. Authorities need to ensure that policies setting out contributions expected from development do not undermine the deliverability of the Plan. (Paragraph 59 Reference ID: 61-059-20190315. 5.35. At present based on the Councils figures presented in the Local Plan, a Plan requirement of 18400, completions equating to 3400 and allocations equating to 16,055, there is a flexibility of around 1055 dwellings which equates to 5% of the Local Plan Requirement. Avant Homes consider that this is insufficient given the potential for non-delivery and under delivery of sites, particularly from the dependency on a number of large sites. As set out in our response to a number of policies within the plan and specifically Policies 8, 46, 66 and 67, Avant Homes are concerned that some of the policies may undermine the
delivery of sites, or lead to the need for further site specific viability testing impacting on the timing of delivery and therefore there is a need for greater flexibility in the housing supply. Specific sites are identified later in this section. 5.36. Avant Homes have a number of concerns relating to the supply in the Plan in terms of completions, the allocations from permissions and the new allocations. 5.37. It is noted that the supply attributed to completions appears to be resultant from gross completions rather than net completions. The Plan indicates that completions between 2015 and 2018 equate to 3400, However data in the Residential Land Availability Report indicates that net completions amount to 2311. Which would serve to increase the residual requirement based on an OAN of 920 to at least 15,189, and reduce the flexibility in the Plan to 866 dwellings (4.7%). 5.38. With regards to overall supply from permissions and allocations, a housing trajectory has been provided. Avant Homes are concerned that this demonstrates that the Council will struggle to maintain a continuous supply of housing particularly in the later phases of the Plan period. Only four sites are identified as being capable of delivery in the final years of the plan period and two sites delivering beyond the plan period. 5.39. Furthermore, the Council’s HELAA and Residential Land Availability Report have a base date of March 2018, thus a whole monitoring year is presently absent. This evidence base should therefore be updated. 5.40. In terms of existing commitments it appears that the Council assumes 100% delivery and no discount has been applied. Best Practice and Guidance suggests that at least a 10% discount should be applied on sites with extant planning permission but this could vary depending on site specific constraints and complexity. Avant Homes supports the discounting of sites with planning permission but consider it may be beneficial to include a higher level of discount for large sites to take into account unforeseen circumstances and delivery delays. Avant Homes consider therefore that from a commitments pot of 9,488 dwellings a discount of at least circa 948 should be applied, however this could feasibly be higher given the history and constraints of a number of sites. 5.41. Avant Homes is concerned with the reliance on some existing housing sites with planning permission and their potential delivery, particularly as some are fairly historic brownfield sites with viability concerns in market challenging areas. There are a considerable number of outstanding planning permissions in poor market areas, some of which are also constrained by flood risk. Evidence of developer interest in such sites should be a fundamental requirement to provide confidence on delivery. For example, a brief review of some sites shown as commitments shows considerable concern: Site Ref: 838 Site Name: Hexthorpe No. of Dwellings: 930 Avant Homes Comment: There have been a number of planning applications and proposed schemes over the years, but there has been no delivery on site. countryside PLC has submitted a planning application which the Environment Agency has objected to and recommended refusal. There is conflicting evidence in terms of delivery rates, with the Local Plan and the HELAA. There are significant flooding constraints affecting the site. No further deliverability evidence has been produced in the Doncaster 5 Year Deliverable Housing Land Supply Statement. The Residential Land Availability Study notes that at 31/03/2018 there were no completions and the site is not currently being developed. Site Ref: 843 Site Name: Manor Farm, Bessacarr No. of Dwellings: 1,009 Avant Homes Comment: This is a Persimmon / Charles Church scheme. However, delivery has become frustrated by the need to deliver infrastructure to complete development. Since there is only one developer on the site the development trajectory is likely to be modest and development of the site is unlikely to be achieved during the plan period. The Residential Land Availability Report indicates 39 completed in 17/18 which is below the rates expected in the Local Plan and HELAA. Which assumes delivery rates of around 70 dwellings a year. This is not realistic based on current delivery. Site Ref: 418 Site Name: Unity/ON7 Initiative No. of Dwellings: 705 Avant Homes Comment: The site has outline planning permission for 3,100 homes and no reserved matters have been submitted. The site is in significant multiple ownership and understand that CPO procedures will be employed to facilitate the delivery of requisite infrastructure. Homes England is also assigning public funding to support the development. Given the presence of multiple landowners, the need for considerable public funding, the likelihood of a protracted timeframe to open up the site for development and the absence of confirmed market interest, the site is unlikely to deliver the Council’s prediction of 1015 homes in the plan period. The HELAA does not anticipate a start on site until years 6 to 10. However the local plan indicates a 175 completions in the first five years. Higher rates of delivery are expected in the following years (70 dwellings per annum). These rates are overly optimistic especially when compared to annual completions for individual sites recorded in the residential land availability report. Site Ref: 569 Site Name: Askern Saw Mills No. of Dwellings: 220 Avant Homes Comment: This is a long standing, unimplemented planning permission that has been available but has remained undeveloped. There is no developer interest and consequently the assumed delivery of 220 new homes is optimistic. Indicated in the Residential Land Availability Report that the outline permission has lapsed. Site Ref: 984 Site Name: Former McCormick Tractors No. of Dwellings: 600 Avant Homes Comment: This site has significant constraints. There is an outline permission relating to the development of the site. The Local Plan assumes a delivery rate of 56 dwellings per in the first five years and 64 dwellings per annum in the following years. This is overly optimistic and not consistent with the planning status and constraints on site. Site Ref: 940 E1 and 2 Site Name: Land east of Poplars Farm No. of Dwellings: 280/920 Avant Homes Comment: Site 940 is allocated in the plan for development of up to 280 dwellings (Part E1), Part E2 is identified as a reserved housing site for up to 920 dwellings. This site does not form a true reserve site. The council have identified a release mechanism which restricts the release of housing to net additional jobs delivered at the airport. 5.42. Avant Homes understands that no allowance has been made for demolitions. No evidence is apparent and Avant Homes consider it would be appropriate for this evidence to be forthcoming. 5.43. The availability of land is crucial. To be considered deliverable the land needs to be available now and in terms of deliverable there needs to be a reasonable prospect that land will be available at the point envisaged. Avant Homes consider that sites which are not available or are unknown should not be included in the Plan or a buffer should be provided due to the uncertainty on delivery. Site Ref: 1028 Site Name: Tickhill No. of Dwellings: 74 Avant Homes Comment: This site does not have access, therefore cannot be considered to be deliverable. Further, the capacity of the site is unrealistic. This is a 1.5 hectare site, a capacity of 44 dwellings would reflect the assumptions on net to gross developable area and density set out in the Viability Study. Site Ref: 662/247 Site Name: Colliery Site, Rossington No. of Dwellings: 897/237 Avant Homes Comment: The delivery rates on the site are overly optimistic. In 2017/18 there were only 49 completions on site 662. Assuming delivery rates based on past performance at this site then it is considered that only 600 dwellings will be capable of coming forward within the Plan period. This is significantly less than the 1127 homes forecast within the Plan. Site Ref: 050/1505 Site Name: Thorncroft No. of Dwellings: 207 Avant Homes Comment: This is a longstanding allocation and there is little evidence available through the council’s evidence base to demonstrate that there is developer interest or that the site will come forward in the short term. Site Ref: 795 Site Name: Thorncroft No. of Dwellings: 13 Avant Homes Comment: This site has permission which has since lapsed. There appears to be little developer interest in this site. The site is not considered to be deliverable. Site Ref: 510 Site Name: Thorne No. of Dwellings: 25 Avant Homes Comment: This is a narrow and constrained infill site, with railway forming the southern boundary of the site. There is little evidence available through the Council’s evidence base to indicate any developer interest in the site. Site Ref: 165/186 Site Name: Carcroft No. of Dwellings: 300 Avant Homes Comment: This site is located to the western edge of the development and is relatively distant from the key services and facilities such as the train station, and employment opportunities. Other sites are located nearer to key services. 5.44. A high level assessment of some of the proposed allocations shows that some proposals are at risk and hence one of the reasons why Best Practice suggests a buffer to the housing requirement should be included in the Plan. Furthermore, would appear to have leaked heavily on allocations that already have planning permission as an alternative to identifying a sufficient supply of new allocation sites to meet its requirement for the plan period. Consequently, a number of settlements with strong sustainability credentials would appear to have insufficient allocations to meet their needs through the life of the plan. 5.45. It would appear in some instances that there are unrealistic assumptions on gross to net developable site areas and on the resultant yields from proposed allocations, especially when considering some of the development requirements. Avant Homes therefore suggest that further
sites should be identified. 5.46. The Council therefore need a wider choice of sites across a number of different areas and market areas to gain traction and increase build rates. To achieve the housing requirement the Council need at least 30-35 housing outlets operating across the Borough for every year of the Plan and Avant Homes do not believe the Plan can deliver this, particularly in the middle to later years. 5.47. Avant Homes considers the Council should be more realistic on the potential delivery on sites, particularly on sites which have not commenced preparations of securing the relevant planning permission and developer interest and on build rates. Avant Homes consider that the sites with no planning permission will not be providing completions until 2023/24 (which is two years post adoption) as there is significant work and preparations to commence on site, including time to prepare and submit the planning application, gain planning permission, discharge conditions, legal agreements, site preparations, and commence house building. This process can take around 2 years. 5.48. Avant Homes would be happy to work through the specific sites in detail with the Council to seek to reach agreement on the HELAA and current housing commitments. Interestingly, in line with the general direction of travel for this Local Plan the new Framework (2019) defines the term Deliverable in the glossary stating that sites can only be considered deliverable where they have detailed planning permission. If they have outline planning permission or are allocated in a plan a site can only be considered if there is clear evidence that housing completions will begin on site within five years. The level of evidence that must be provided to demonstrate that sites are deliverable has therefore been tightened. 5.49. Avant Homes considers that the main risks to the delivery of the housing requirement are slippages in the delivery of allocations, longer lead-in times, reduced housing capacity on sites, sites no longer coming forward as result of viability from policy obligations set out in the Local Plan. Given these risks Avant Homes would suggest a greater flexibility is incorporated into the Local Plan especially in light of Avant Homes' conclusions on the actual housing requirement. 5.50. Avant Homes would encourage the Council to review the existing commitments to ensure this is still deliverable, whether there is a housebuilder on board and whether there are any constraints preventing development from coming forward. Avant Homes would also ask the Council to look at the proposed delivery of site allocations to determine whether the delivery rates are appropriate and the sites are deliverable in light of the policy obligations proposed in the Local Plan. 5.51. Taking into account the above, the Council should be making provision for: Annual Housing Requirement Council Figures: 920 Avant Homes' View: 1,100 Total Requirement (2015-2035) - which is 15 years post adoption Council Figures: 18,400 Avant Homes' View: 22,000 Completions Council Figures: 3,400 Avant Homes' View: 3,211 Total Commitments Council Figures: 9,488 Avant Homes' View: 9,488 Non-Delivery Allowance (at least 10%) Council Figures: 948.8 Avant Homes' View: 948.8 Total Allocations Council Figures: 6,567 Avant Homes' View: 6,567 Total Supply Council Figures: 18,506 Avant Homes' View: 18,317.2 Residual homes to be identified Council Figures: -106.2 Avant Homes' View: 3,682.2 5.52. Therefore, on a best case scenario Avant Homes consider as a minimum requirement there needs to be circa 3,682 new homes to be identified in the Plan to account for net completions, and economic growth. 5.53. This as a minimum does not account for the uplift required to ensure affordable housing need is met in full, which as indicated in paragraph 5.28, would lead to a requirement of 1,393 dpa and a plan requirement of 27,860. Based on the current supply of 3,211 completions, 9,488 commitments, an allowance for 10% non-implementation, and the currently proposed allocations of 6,567 homes, this would lead to need for a further 9,542 additional homes. 5.54. Significantly, the above scenario does not balance housing provision with the additional employment allocations. The additional employment allocations amount to 83.77 hectares above the requirement, this is the equivalent of an additional 3.5 years supply of land. As a result in order to balance the housing provision with the additional employment supply circa 3,850 additional homes would be required, this amounts to an annual requirement of 1,292.5 dpa. Avant Homes consider circa 7,532 additional homes are required in order to balance the Housing with Employment supply, account for net completions and appropriate non-implementation rates. Employment requirement 2015-2035 Avant Homes' View: 481 hectares Annual employment requirement Avant Homes' View: 24 hectares Employment land developed 2015-2018 Avant Homes' View: 117 Sites with planning permission Tables E1 to E8 Avant Homes' View: 284.09 New employment allocations Policy 4 Avant Homes' View: 164.68 Total Allocations Avant Homes' View: 565.77 Amount of land allocated over the requirement Avant Homes' View: 83.77 Additional homes required to balance with employment land supply Avant Homes' View: 3,850 Residual homes to be identified Avant Homes' View: 7,532.2 5.55. These figures assume no changes to the currently identified housing sites, which, in response to policy 3 and policy 6, Avant Homes have raised significant concerns, particularly with regards the deliverability, capacity, and delivery rates of some sites and the overrelance on existing permissions or longstanding allocations. This does not account for additional economic growth associated with the airport. 5.56. Furthermore, there does not appear to be any safeguarded sites or genuinely deliverable reserve sites identified within the Draft Plan. This is concerning given Policy 6 states that the Plan will designated Reserve Development Sites. However, it states that the reserves sites identified are not considered developable in the plan period. Paragraph 4.43 of the Plan indicates that the reserve sites have flood risk mitigation issues or safeguarding issues associated with HS2 preventing them from coming forward. Avant Homes would suggest, in order to assist with flexibility, that safeguarded sites be proposed in accordance with national guidance. The only other reserve site is related to direct job growth at the Airport and is strictly controlled, thus does not provide flexibility for the Plan as a whole. 5.57. The above scenarios do not include a detailed analysis of existing commitments and proposed allocations, however from a high level analysis it is evident that the Council's trajectory and analysis of sites is optimistic. 5.58. Therefore, with an increased housing requirement, reduced potential from existing planning permissions sites and incorporation of a flexibility allowance, further land will need to be identified. 5.59. Avant Homes consider that the appropriate areas and sites to accommodate growth would be: - Site 494: Green Lane, Scawthorpe, Doncaster - New Site: Melton Road, Newton, Doncaster - HELAA Site (871): Wadworth Hill, Wadworth 5.60. A brief summary is provided for these sites in response to Policy 6. Technical information and an advocacy report for each site will submitted shortly. The Advocacy Report will show a masterplan and vision for the proposed development scheme and illustrates the potential of the scheme. This report will be supported by significant technical information and the report will demonstrate that the sites are available, suitable and achievable and therefore deliverable in accordance with the Framework and PPG. 5.61. Avant homes consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 5.62. However, Avant Homes consider that with an appropriate uplift to the housing requirement, consideration of net completions, non-implementation rates and the allocation of additional land and safeguarded sites that the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 5.63. To overcome the objection and address soundness matters, the Council should: - Increase housing requirement to 1,100 to 1,300 dwellings over the plan period. - Reduce the potential from current commitments and include a non-delivery allowance. - Identify safeguarded land. - Allocate: o Site 494: Green Lane, Scawthorpe, Doncaster o New Site: Melton Road, Newton, Doncaster o HELAA Site (871): Wadworth Hill, Wadworth
The Local Plan housing requirement is not sufficient and not fully aligned with forecast economic growth. It identifies significantly more employment land than the target for provision established in Policy 3. There is a significant mismatch between employment land allocations and housing land allocations. The identified supply is insufficient to meet the Council’s identified requirement. Regeneris Consulting have reviewed the housing requirement of 18,400 dwellings over the plan period / 920 dpa. They found that the PBA report made unjustified and unrealistic assumptions for a number of factors which suppress the level of housing required to support future employment growth. Specifically disagree about assumptions on commuting, double jobbing and household formation (report supplied). The report considers that Doncaster has one of the fastest growing economies in Yorkshire and the Humber and has created 24,000 jobs 2000 - 2017 (1.1% pa). Its key asset is connectivity by rail, air and road which is highly attractive to investors, especially industrial and logistics occupiers. Over 1.1m sq m of industrial / warehousing land has been taken up since 2010. There has been a significant improvement in key economic indicators, including skills and level of enterprise. The business start up rate has more than doubled since 2010 and is in line with the national average, thus removing a key barrier to growth. There continues to be demand for industrial space in Doncaster and strong potential to accommodate high levels of inward investment in future, which would drive jobs growth. Given this, not enough homes are being planned for, and there needs to be a more appropriate balance between housing provision and economic ambitions. It is clear from the framework that the standard method is a starting point and a minimum, not a housing requirement figure itself. It is also clear that the affordability adjustment within the standard methodology is just to ensure that the minimum housing needs starts to address affordability of homes. It therefore does not fully address affordability issues. There may be exceptional circumstances for planning for more housing. The Council need to recognise that the development of new housing will bring economic benefits to the area. New housing can support economic growth both through direct job creation through construction and through increased population, which will create sustainable jobs and increased goods / services demand. This provides an important sustainable development opportunity. The HBF report that housebuilding is worth £38bn p/a (England and Wales) and supports 700,000 jobs. House building supports the economic in a wider sense through being drive for economic growth; delivering jobs and economic value; supporting labour market mobility; creating skills and employability; enhancing place competitiveness; creating quality of place and reusing brownfield land. The report concludes that a healthy, well-functioning labour market requires a good supply of housing that is affordable for local people to enable them to move jobs freely and match up skills supply with employer demand. A dysfunctional housing market can inhibit labour market mobility, in turn stifling economic growth. Regenris consider the housing need should be 1,100dpa to support economic growth. 920 dpa risks constraining the future economic growth of Doncaster. Furthermore jobs are only forecast 2015 - 32, it is unclear what consideration has been given to expected job growth to the end of the plan period and therefore it is considered possible that the jobs led target underestimates the need over the full plan period. There is a discrepancy between para. 4.61 and Tables E1 - E8 and the numbers stated (481ha vs. 565.77ha), and there is also additional employment land available according to tables E1 - E8. There is a significant mismatch between the level of planned employment provision in Policy 4 and planned housing. The housing requirement needs to be uplifted to reflect the employment land provision. Net completions 2015 - 18 amount to 3,211 and have been consistently higher than the Local Plan target. This shows there is sufficient demand to support a requirement above 920dpa. PBA calculated 1,073 in an earlier approach and advised it is prudent to plan for between 562 and 1,073. 1% employment growth would support a target at the top of this range. There is therefore evidence of higher delivery of housing and a higher need. PPG is clear this evidence should be taken into account when determining the housing requirement. 912dpa is not based on jobs growth over the full plan period. Furthermore, there is evidence the affordable housing needs in the borough cannot be met based on a target of 920. Affordable housing delivery is below 23% even against higher rates of deliver than 920dpa. Concern that 920 will not deliver the affordable housing needed. To deliver 209 affordable dwellings per annum, 1,393 dpa would be needed, assuming an average of 15% affordable housing (the highest achieved over the past 3 years). There is sufficient evidence for an uplift to the housing figure. The policy is not justified or consistent with the framework and the plan is currently unsound. The requirement should be at least 1,100 to meet economic growth ambitions and balance housing / job aspirations and ensure the needs for affordable homes can be met (up to 1,393 dpa). Concern that the Council’s approach to delivering the housing requirement does not reflect national guidance. There is insufficient flexibility in the supply of land to meet the identified needs in full. The framework is clear plans should be flexible to adapt to rapid change and emphasises the importance of ensuring that a sufficient amount and variety of land can come forward when needed. The plan period requirement is 18,400, with 3,400 completions and maximum completions equivalent to about 16,055. This provides a flexibility of 5% (1,055 dwellings), which is insufficient given the potential for non delivery and under delivery of sites - particularly from dependency on a number of large sites. Some policies may undermine delivery (especially 8, 46, 66 and 67) or lead to the need for further site specific viability testing which impacts on the timing of delivery and therefore means greater flexibility is required. It is noted that supply attributed to completions appears to be gross not net. The plan indicates completions of 3,400 but according to the RLA reports, net completions are 3,211. This would leave the residual requirement based on 920 to at least 15,189 and reduce flexibility in the plan to 866 dwellings (4.7%). The trajectory shows the council would struggle to maintain a continuous supply over the plan period, especially later on. The RLA is also not up to date and needs updating. 100% deliverability of commitments should not be assumed, there should be at least a 10% discount, according to best practice and guidance. This is supported with higher levels of discounting for larger sites to account for unforeseen circumstances and delivery delays. Out of 9,488 plots, there should be a discount of c. 948, however it could be higher given concerns about some deliverability. Concern with reliance on commitments especially as some are historic brownfield sites with viability concerns in challenging marker areas, some of which also constrained by flood risk. Evidence of developer interest in such sites should be a fundamental requirement to provide confidence on delivery. Concerning sites include: Site Ref: 838 Site Name: Hexthorpe No. of Dwellings: 930 Avant Homes Comment: There have been a number of planning applications and proposed schemes over the years, but there has been no delivery on site. Countryside PLC has submitted a planning application which the Environment Agency has objected to and recommended refusal. There is conflicting evidence in terms of delivery rates, with the Local Plan and the HELAA. There are significant flooding constraints affecting the site. No further deliverability evidence has been produced in the Doncaster 5 Year Deliverable Housing Land Supply Statement. The Residential Land Availability Study notes that at 31/03/2018 there were no completions and the site is not currently being developed. Site Ref: 843 Site Name: Manor Farm, Bessacarr No. of Dwellings: 1,009 Avant Homes Comment: This is a Persimmon / Charles Church scheme. However, delivery has become frustrated by the need to deliver infrastructure to complete development. Since there is only one developer on the site the development trajectory is likely to be modest and development of the site is unlikely to be achieved during the plan period. The Residential Land Availability Report indicates 39 completed in 17/18 which is below the rates expected in the Local Plan and HELAA. Which assumes delivery rates of around 70 dwellings a year. This is not realistic based on current delivery. Site Ref: 418 Site Name: Unity/DIN7 Initiative No. of Dwellings: 905 Avant Homes Comment: The site has outline planning permission for 3,100 homes and no reserved matters have been submitted. The site is in significant multiple ownerships and understanding that CPO procedures will be employed to facilitate the delivery of requisite infrastructure. Homes England is also assigning public funding to support the development, which will give the site a considerable public funding, the developer/PLC has a protected timeframe to open up the site for development and the absence of confirmed market interest, the site is unlikely to deliver the Council’s prediction of 1015 homes in the plan period. The HELAA does not anticipate to start on site until years 6 to 10. However the local plan indicates a
175 completions in the first five years. Higher rates of delivery are expected in the following years (70 dwellings per annum). These rates are overly optimistic especially when compared to annual completions for individual sites recorded in the residential land availability report. Site Ref: 569 Site Name: Askern Saw Mills No. of Dwellings: 220 Avant Homes Comment: This is a long standing, unimplemented planning permission that has been available but has remained undeveloped. There is no developer interest and consequently the assumed delivery of 220 new homes is optimistic. Indicated in the Residential Land Availability Report that the outline permission has lapsed. Site Ref: 594 Site Name: Former McCormick Tractors No. of Dwellings: 670. Avant Homes Comment: This site has significant constraints: there is an outline permission relating to the development of the site. The Local Plan assumes a delivery rate of 56 dwellings per in the first five years and 64 dwellings per annum in the following years. This is overly optimistic and not consistent with the planning status and constraints on site. Site Ref: 940 E1 and E2 Site Name: Land east of Poplars Farm No. of Dwellings: 280/920 Avant Homes Comment: Site 940 is allocated in the plan for development of up to 280 dwellings (Part E1), Part E2 is identified as a reserved housing site for up to 920 dwellings. This site does not form a true reserve site. The council have identified a release mechanism which restricts the release of housing to net additional jobs delivered at the airport. Sites which are unavailable or unknown should not be included, such as: Site Ref: 1028 Site Name: Tickhill No. of Dwellings: 74 Avant Homes Comment: This site does not have access, therefore cannot be considered to be deliverable. Further, the capacity of the site is unrealistic. This is a 1.5 hectare site, a capacity of 44 dwellings would reflect the assumptions on net to gross developable area and density set out in the Viability Study. Site Ref: 662/247 Site Name: Colliery Site, Rostington No. of Dwellings: 897/237 Avant Homes Comment: The delivery rates on the site are overly optimistic. In 2017/18 there were only 49 completions on site 662. Assuming delivery rates based on past performance at this site then it is considered that only 600 dwellings will be capable of coming forward within the Plan period. This is significantly less than the 1172 homes forecast within the Plan. Site Ref: 081/343 Site Name: Thorne No. of Dwellings: 207 Avant Homes Comment: This is a longstanding allocation and there is little evidence available through the council's evidence base to demonstrate that there is developer interest or that the site will come forward in the short term. Site Ref: 795 Site Name: Thorne No. of Dwellings: 13 Avant Homes Comment: This site had permission which has since lapsed. There appears to be little developer interest in this site. The site is not considered to be deliverable. Site Ref: 510 Site Name: Thorne No. of Dwellings: 300 Avant Homes Comment: This is a narrow and constrained infill site, with railway forming the southern boundary of the site. There is little evidence available through the Councils evidence base to indicate any developer interest in the site. Site Ref: 165/186 Site Name: Carcroft No. of Dwellings: 300 Avant Homes Comment: This site is located to the western edge of the settlement and is relatively distant from the key services and facilities such as the train station, and employment opportunities. Other sites are located nearer to key services. A high level assessment shows some proposals are at risk and hence why a buffer is required. Furthermore, existing permissions are heavily relied on as an alternative to identifying a sufficient supply of new allocations. Consequentially, a number of sustainable places have insufficient allocations to meet their needs throughout the plan period. There are also unrealistic assumptions on gross to net deliverable site areas and proposed yields especially given developer requirements. Further sites are therefore needed. The Council therefore need a wider choice of sites across a number of different areas and market areas to gain traction and increase build rates. To achieve the housing requirement the Council need at least 30-35 housing outlets operating across the Borough for every year of the Plan. Do not believe the plan can deliver this, especially in later years. The council should be realistic on delivery of sites, especially those which have not commenced preparations for securing relevant planning permissions, and developer interest on build rates. Sites without permission should not be providing completions until at least 2023/24. Those with permission must have clear evidence of deliverability. Flexibility must be built in and commitments reviewed check deliverability, house builders on board and what constraints exist. Delivery rates must also be reviewed to check sites are deliverable in light of policy obligations. The council should make provision for: Annual Housing Requirement Council Figures: 920 Avant Homes' View: 1,100 Total Requirement (2015-2035) - which is 15 years post adoption Council Figures: 18,400 Avant Homes' View: 22,000 Completions Council Figures: 3,211 Total Commitments Council Figures: 9,488 Avant Homes' View: 9,488 Non-Delivery Allowance (at least 10%) Council Figures: 948.8 Avant Homes' View: 948.8 Total Allocations Council Figures: 6,567 Avant Homes' View: 6,567 Total Supply Council Figures: 18,506 Avant Homes' View: 18,317.2 Residual homes to be identified Council Figures: -106.2 Avant Homes' View: 3,682.2 Best case, there must be c.3682 new homes to be identified in the Plan to account for net completions, and economic growth. This does not account for the uplift required to ensure affordable housing need is met in full, which as indicated in paragraph 5.28, would lead to a requirement of 1,393 dpa and a plan requirement of 27,860. Based on the current supply of 3,211 completions, 9,488 commitments, an allowance for 10% non-implementation, and the currently proposed allocations of 6,567 homes, this would lead to need for a further 9,542 additional homes. The above scenario does not balance housing and employment. The additional employment allocations amount to 83.77 hectares above the requirement, this is the equivalent of an additional 3.5 years supply of land. As a result in order to balance the housing provision with the additional employment supply circa 3,850 additional homes will be required, this amounts to an annual requirement of 1,292.5 dpa. Avant Homes consider circa 7,532 additional homes are required in order to balance the Housing with Employment supply, account for net completions and appropriate non-implementation rates. Employment requirement 2015-2035 Avant Homes' View: 481 hectares Annual employment requirement Avant Homes' View: 24 hectares Employment land developed 2015-2018 Avant Homes' View: 117 Sites with planning permission E1 to E8 Avant Homes' View: 284.09 New employment allocations Policy 4 Avant Homes' View: 164.68 Total Allocations Avant Homes' View: 565.77 Amount of land allocated over the requirement Avant Homes' View: 83.77 Additional homes required to balance with employment land supply Avant Homes' View: 3,850 Residual homes to be identified Avant Homes' View: 7,532.2 Assuming no changes to the housing supply, which are also concerns about, or airport economic growth. There should also be safeguarded land. Avant Homes consider that the appropriate areas and sites to accommodate growth would be: - Site 494: Green Lane, Scawthorpe, Doncaster - New Site: Melton Road, Newton, Doncaster - HELAA Site (871): Wathwood Hill, Wathwood - Increase housing requirement to 1,100 to 1,300 dwellings over the plan period. - Reduce the potential from current commitments and include a non-delivery allowance. - Identify safeguarded land. - Allocate: o Site 494: Green Lane, Scawthorpe, Doncaster o New Site: Melton Road, Newton, Doncaster o HELAA Site (871): Wathwood Hill, Wathwood 

Response:
The Peter Brett's report assesses the employment and housing target for the borough and ties the two together to ensure the right amount of houses are provided for the projected growth. The Council are confident that this report provides a sound and realistic figure. Many ways have been submitted to the Council about how the housing and employment figures could be derived. The submission Local Plan included a range, but still plans for enough housing to meet the requirement of 920dpa over the plan period - the use of a range does not prejudice this. 920dpa is the assessed level of housing required under the revised NPPF, 1,073 refers to the figure using the previous NPPF, which is now redundant. It should also be noted the PBA report states a mid-way point between 585 and 920 could be used, which the Council elected not to do. The Local Plan is planning for 57% more housing proposed, and in doing so the Council have taken on board national policy and guidance. The jobs requirement covers the period 2015 - 35, and enough housing is planned for to match this - there is no reason to uplift this further, including for affordable housing. There is additional flexibility in housing delivery, as the plan does not factor in to its calculations windfalls; sites of 1-4 units; any development in Defined Villages; the proposed 280 dwellings at the airport + possible 920 further linked to job delivery; and the potential of Reserve Development Sites to deliver housing. If all these are factored in, then there is a total potential supply of
24,880 + future windfalls and potential empty homes coming into use, which is 6,480 above the 20 year requirement of 18,400, or in effect a buffer of 35%. Trajectories and other matters raised or covered in the Housing Topic Paper. The RLA has been updated for 2019 now. Consideration has been given to site constraints and delivery, and factored in where appropriate - this is discussed in the Site Selection Methodology and Housing Topic Paper. With regards to site 494, it is not felt that exceptional circumstances exist to justify the release of this site, as set out in the Green Belt Topic Paper. 871 is in a Defined Village where no new allocations are being made.
The strong performance is also due to a significant improvement in key economic indicators, with a growth rate of 1.1% per annum. The Local Plan identifies significantly more employment land than the target for provision established in Policy 3. There is a significant mismatch between the level of employment land allocated and the level of housing land allocated in the Plan period, and the identified supply is not sufficient to meet the Council’s identified requirement. Need 5.4. Avant Homes is concerned with the proposed level of new housing being planned for in the Local Plan. Policy 3 makes provision for 18,400 dwellings to be delivered between 2015 and 2035, equivalent to 920 net new homes each year. Policy 3 states that there should be sufficient allocations for 15 years supply, which is 13,230 new homes. 5.5. Avant Homes has commissioned Regeneris Consulting to review the OAN and the Economic Forecasts and Housing Needs Assessment (2018). The Regeneris report is attached to these representations. Regeneris conclude that: The target delivers the minimum level of housing need for Doncaster based on the standard method (585 dpa) and makes an upward adjustment to support economic growth. The upward adjustment was based on evidence produced by PBA which recommended a minimum housing need as presented by the area. The relationship between economic performance and housing is complex, but having the right quantity, quality and balance of inward investment in future which would also drive jobs growth. 5.7. Avant Homes has concerns that the proposed housing requirement does not represent an appropriate figure once consideration is given to the potential for economic growth and job formation. Avant Homes believe that the Local Plan will not deliver sufficient housing and does not reflect national guidance. The Local Plan has set a target of delivering 481 hectares of employment land between 2015 and 2035 and a number of ERL’s shows there continues to be very strong market demand for industrial space in Doncaster. There is therefore strong potential for Doncaster to accommodate high levels of inward investment in future which would also drive jobs growth. 5.8. The Framework (2019) reaffirms the Governments’ commitment to ‘significantly boosting the supply of homes’ and states that ‘it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed’. It goes on to state ‘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 and alternative approach which also reflects current and future demographic trends and market signals’. 5.9. NPPG is clear that the standard method identifies a minimum annual housing need figure and that it does not produce a housing requirement figure. Paragraph 002 Reference ID: 2a-002-20190220. It is also clear that the affordability adjustment within the standard methodology is just to ensure that the minimum housing needs starts to address affordability of homes. It therefore does not fully address affordability issues. Paragraph 006 Reference ID: 2a-006-20190220. 5.10. NPPG goes on to identify the circumstances when it is appropriate to plan for a higher housing need figure than the standard methodology identifies. The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides the minimum starting point in determining the number of homes needed in an area? It does not predict the impact of future government policies, changing economic circumstances or other factors that might have an impact on demographic behaviour. Therefore there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicate. 5.11. This will need to be assessed prior to and separate from, considering how much of the overall need can be accommodated. Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: 5.12. Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth 5.13. Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; 5.14. An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground. 5.15. There may, occasionally be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced SHMA) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need that the standard model suggests’. Paragraph 010 Reference ID: 2a-010-20190220. 5.16. The Council need to recognise that the development of new housing will bring forward additional economic benefits to the area. The relationship between economic performance in an area and housing is complex, but having the right quantity, quality and balance.
of housing in an area is necessary for economic growth. The development of new housing can therefore support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population which will create sustainable local jobs from the increased demand for goods and services. This provides an important sustainable development opportunity for Doncaster.

5.17. Importantly the HBF released in July 2018 its report on "the economic footprint of house building in England and Wales", which shows that house building in England and Wales is now worth £38bn a year and supports nearly 700,000 jobs. House building activity contributes economically in different ways including providing jobs, tax revenue and contributing funding for local infrastructure and communities. House building supports the economic in a wider sense through being drive for economic growth, delivering jobs and economic value; supporting labour market mobility; creating skills and employability; enhancing place competitiveness; creating quality of place and reusing brownfield land.

5.18. An important conclusion of the report and the wider economic benefits is that a healthy, well-functioning labour market requires a good supply of housing that is affordable for local people to enable them to move jobs freely and match up skills supply with employer demand. A dysfunctional housing market can inhibit labour market mobility, in turn stifling economic growth. 5.19. Regeneris consider that Doncaster’s housing need over the plan period should be 1,100 dpa to support future economic growth. Regeneris consider that the target of 920 dpa would risk constraining the future economic growth of Doncaster. 5.20. Furthermore, it is evident that the council are seeking to align economic growth with housing growth and have identified provision above the local housing need figure to which the council considers accounts for Job led growth. However, the jobs led growth figure is based on jobs growth forecast between 2015-2032. It is not clear whether consideration has been given to the additional job growth expected to the end of the plan period. Therefore Avant consider there is potential for the jobs led scenario to underestimate the jobs growth over the full plan period. The associated uplift to the housing requirement will therefore not be sufficient to meet the full needs over the plan period. 5.21. Additionally, the Council have identified a requirement for 481 hectares of employment land based on the Job led scenario, and accounting for the extended plan period between 2032 and 2035. The explanatory text considers that this requirement is met through 117 hectares of land developed between 2015-2018, 201 hectares of land benefiting from planning permission, and 164 hectares of allocated sites. However, there is a discrepancy between the totals in paragraph 4.61 of the Plan and the figures arising from Tables E1 to E8. The sites that benefit from planning permission in tables E1 to E8 equate to 284.09 ha of employment land available within the Plan period. This leads to a total provision of 565.77 hectares of employment land against a requirement of 481 hectares. It should be noted that within the permissions identified in Tables E1 to E8 that additional employment land is available, adding to the potential supply. There is therefore a significant mismatch between the level of planned employment provision in Policy 4 and the planned housing provision. Therefore, the housing requirement needs to be uplifted to reflect the identified level of employment land provision. 5.22. As stated above NPPG indicates that consideration can be given to delivery rates, for the last three years completions have been consistently higher than the proposed local plan target. Net completions amount to 3211 dwellings, with annual completions as follows: Year: 2015-16 Net Completions: 1,025 Year: 2016/17 Net Completions: 1,049 Year: 2017/18 Net Completions: 1,137 Year: Total Net Completions: 3,211 5.23. This demonstrates that there is sufficient demand to support a requirement above 920 dwellings per annum. 5.24. The Councils Economic Forecasts and Housing Needs Assessment (PBA, 2018) considers the housing requirement prior against both the standard methodology, standard methodology with an uplift for economic growth and previous approach for identifying housing need. Following the earlier approach, PBA consider that an aspirational job led figure, based on the SEP ambitions, would equate to a requirement of 1,073. PBA considered that it would be prudent to plan for between 562 and 1073. To ensure that the requirement was realistic. It is worthy of note that the Employment Land Needs Assessment (2019). Considers that the Job led scenario was ambitious but realistic and notes the significant growth in Doncaster within the previous 15 years in line with SCR growth aspirations. And further the evidence of land take up and jobs growth for the period 2015-2018 was on target to meet 1% jobs growth per annum. This would support a target at the higher end of the range. 5.25. There is therefore evidence of both delivery at a higher rate and recently published evidence that indicates a higher need for housing. As stated above NPPG is clear that this evidence should be taken into account when determining the housing requirement. 5.26. When using the standard method the housing need figure was 585, applying a job led figure to match the SEP led to a requirement of 912 (PBA, 2018). However this is not based on the Jobs growth over the full plan period. 5.27. Avant Homes consider further evidence is required to demonstrate whether the affordable housing needs of Doncaster can be met based on a target of 920. The explanatory text states that the current need for affordable housing, 209 affordable units, represents 23% of the Local Plan requirement for housing. Paragraph 6.9 states that this does not take into account current completions or viability. The completions affordable completions for the last three years (first three years of the Local Plan) are as follows: Year: 15/16 Affordable Completions: 151 Total Completions: 1,088 Affordable completions (%): 13.88 Year: 16/17 Affordable Completions: 161 Total Completions: 1,067 Affordable completions (%): 15.09 Year: 17/18 Affordable Completions: 166 Total Completions: 1,208 Affordable completions (%): 13.74 5.28. The total affordable completions falling below the identified affordable need, even when total completions are higher than the proposed Local Plan requirement of 920. Further, Policy 8 identifies a requirement for 23% affordable housing in high/value medium areas and 15% in low value areas. An as indicated in response to Policy 8 and Policy 67, this is demonstrated to be unviable for a number of sites, including all types of sites in low value areas. Avant Homes are therefore concerned that a target of 920 dwellings will not deliver sufficient number and range of affordable homes to meet the identified need for affordable homes in the Borough. In order to deliver 209 affordable dwellings per year, a requirement of at least 1,393 would be required. This assuming the achievement of an average of 15% affordable housing, which represents the highest achieved over the last three years of monitoring. 5.29. Avant Homes consider that there is sufficient evidence to pointing to the need for further uplift in the Local Plan housing requirement, based on the significant mismatch between housing and employment land allocations, the need to support the local plans economic ambitions, evidence of delivery and the need to ensure sufficient delivery of affordable housing. 5.30. Avant homes consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework. In these circumstances, We do not consider the Council’s approach to delivering the housing requirement does not appear to reflect national guidance. 5.33. The Council is not demonstrating sufficient flexibility in the supply of housing land to ensure that the Plan can meet identified needs in full. The Framework is clear that plans should be sufficiently flexible to adapt to rapid change, and emphasises the importance of ensuring that a sufficient amount and variety of land can come forward where it is needed. 5.34. PPG is clear that careful attention should be given to providing an adequate supply of land, and the Plan needs to be realistic about what can be achieved and when. Authorities need to ensure that policies setting out contributions expected from development do not undermine the deliverability of the Plan. (Paragraph 59 Reference ID: 61-059-20190315. 5.35. At present based on the Councils figures presented in the Local Plan, a Plan requirement of 18400, completions equating to 3400 and allocations equating to 16,055, there is a flexibility of around 1055 dwellings which equates to 5% of the Local Plan Requirement. Avant Homes consider that this is insufficient given the potential for non-delivery and under delivery of sites, particularly from the dependency on a number of large sites. As set out in our response to a number of policies within the plan and specifically Policies 8, 46, 66 and 67, Avant Homes are concerned that some of the policies may undermine the
deliverability of sites, or lead to the need for further site specific viability testing impacting on the timing of delivery and therefore there is a need for greater flexibility in the housing supply. Specific sites are identified later in this section. 5.36. Avant Homes have a number of concerns relating to the supply in the Plan in terms of completions, the allocations from permissions and the new allocations. 5.37. It is noted that the supply to completions appears to be resultant from gross completions rather than net completions. The Plan indicates that completions between 2015 and 2018 equate to 3400, However data in the Residential Land Availability Report indicates that net completions amount to 3211. Which would serve to increase the residual requirement based on an OAN of 920 to at least 15,189, and reduce the flexibility in the Plan to 866 dwellings (4.7%). 5.38. With regards to overall supply from permissions and allocations, a housing trajectory has been provided. Avant Homes are concerned that this demonstrates that the Council will struggle to maintain a continuous supply of housing particularly in the later phases of the Plan period. Only four sites are identified as being capable of delivery in the final years of the plan period and two sites delivering beyond the plan period. 5.39. Furthermore, the Council’s HELAA and Residential Land Availability Report have a base date of March 2018, thus a whole monitoring year is presently absent. This evidence base should therefore be updated. 5.40. In terms of existing commitments it appears that the Council assumes 100% delivery and no discount has been applied. Best Practice and Guidance suggests that at least a 10% discount should be applied on sites with extant planning permission but this could vary depending on site specific constraints and complexity. Avant Homes supports the discounting of sites with planning permission but consider it may be beneficial to include a higher level of discount for large sites to take into account unforeseen circumstances and delivery delays. Avant Homes consider therefore that from a commitments pot of 9,488 dwellings a discount of at least circa 948 should be applied, however this could feasibly be higher given the history and constraints of a number of sites. 5.41. Avant Homes is concerned with the reliance on some existing housing sites with planning permission and their potential delivery, particularly as some are fairly historic brownfield sites with viability concerns in market challenging areas. There are a considerable number of outstanding planning permissions in poor market areas, some of which are also constrained by flood risk. Evidence of developer interest in such sites should be a fundamental requirement to provide confidence on delivery. For example, a brief review of some sites shown as commitments shows considerable concern: Site Ref: 838 Site Name: Hexthorpe No. of Dwellings: 930 Avant Homes Comment: There have been a number of planning applications and proposed schemes over the years, but there has been no delivery on site. Countryside PLC has submitted a planning application which the Environment Agency has objected to and recommended refusal. There is conflicting evidence in terms of delivery rates, with the Local Plan and the HELAA. There are significant flooding constraints affecting the site. No further deliverability evidence has been produced in the Doncaster 5 Year Deliverable Housing Land Supply Statement. The Residential Land Availability Study notes that at 31/03/2018 there were no completions and the site is not currently being developed. Site Ref: 843 Site Name: Manor Farm, Bessacarr No. of Dwellings: 1,009 Avant Homes Comment: This is a Persimmon / Charles Church scheme. However, delivery has become frustrated due to the need to deliver infrastructure to complete development. Since there is only one developer on the site the development trajectory is likely to be modest and development of the site is unlikely to be achieved during the plan period. The Residential Land Availability Report indicates 39 completed in 17/18 which is below the rates expected in the Local Plan and HELAA. Which assumes delivery rates of around 70 dwellings a year. This is not realistic based on current delivery. Site Ref: 418 Site Name: Unity/DN7 Initiative No. of Dwellings: 905 Avant Homes Comment: The site has outline planning permission for 3,100 homes and no reserved matters have been submitted. The site is in significant multiple ownership and understand that CPO procedures will be employed to facilitate the delivery of requisite infrastructure. Homes England is also assigning funding to support the development. Given the presence of multiple landowners, the need for considerable public funding, the likelihood of a protracted timeframe to open up the site for development and the absence of confirmed market interest, the site is unlikely to deliver the Council’s prediction of 1015 homes in the plan period. The HELAA does not anticipate a start on site until years 6 to 10. However the local plan indicates a 175 completions in the first five years. Higher rates of delivery are expected in the following years (70 dwellings per annum). These rates are overly optimistic especially when compared to annual completions for individual sites recorded in the residential land availability report. Site Ref: 569 Site Name: Askern Saw Mills No. of Dwellings: 220 Avant Homes Comment: This is a long standing, unimplemented planning permission that has been available but has remained undeveloped. There is no developer interest and consequently the assumed delivery of 220 new homes is optimistic. Indicated in the Residential Land Availability Report that the outline permission has lapsed. Site Ref: 984 Site Name: Former McCormick Tractors No. of Dwellings: 600 Avant Homes Comment: This site has significant constraints. There is an outline permission relating to the development of the site. The Local Plan assumes a delivery rate of 56 dwellings per in the first five years and 64 dwellings per annum in the following years. This is overly optimistic and not consistent with the planning status and constraints on site. Site Ref: 940 E1 and E2 Site Name: Land east of Poplars Farm No. of Dwellings: 280/920 Avant Homes Comment: Site 940 is allocated in the plan for development of up to 280 dwellings (Part E1), Part E2 is identified as a reserved housing site for up to 920 dwellings. This site does not form a true reserve site. The council have identified a release mechanism which restricts the release of housing to net additional jobs delivered at the airport. 5.42. Avant Homes understands that no allowance has been made for demolitions. No evidence is apparent and Avant Homes consider it would be appropriate for this evidence to be forthcoming. 5.43. The availability of land is crucial. To be considered deliverable the land needs to be available now and in terms of developable there needs to be a reasonable prospect that land will be available at the point envisaged. Avant Homes consider that sites which are not available or are unknown should not be included in the Plan or a buffer should be provided due to the uncertainty on delivery. Site Ref: 1028 Site Name: Tickhill No. of Dwellings: 74 Avant Homes Comment: This site does not have access, therefore cannot be considered to be deliverable. Further, the capacity of the site is unrealistic. This is a 1.5 hectare site, a capacity of 44 dwellings would reflect the assumptions on net to gross developable area and density set out in the Viability Study. Site Ref: 662/247 Site Name: Colliery Site, Rossington No. of Dwellings: 897/237 Avant Homes Comment: The delivery rates on the site are overly optimistic. In 2017/18 there were only 49 completions on site. Assuming delivery rates based on past performance at this site then it is considered that only 600 dwellings will be capable of coming forward within the Plan period. It is significantly less than the Plan’s projection for 1127 homes. The Plan’s forecast within the Plan period is 824. Site Name: Thorne No. of Dwellings: 207 Avant Homes Comment: This is a longstanding allocation and there is little evidence available through the Council’s evidence base to demonstrate that there is developer interest or that the site will come forward in the short term. Site Ref: 795 Site Name: Thorne No. of Dwellings: 13 Avant Homes Comment: This site had permission which has since lapsed. There appears to be little developer interest in this site. The site is not considered to be deliverable. Site Ref: 510 Site Name: Thorne No. of Dwellings: 25 Avant Homes Comment: This is a narrow and constrained infill site, with railway forming the southern boundary of the site. There is little evidence available through the Councils evidence base to indicate any developer interest in the site. Site Ref: 165/186 Site Name: Carcroft No. of Dwellings: 300 Avant Homes Comment: This site is located to the western edge of the settlement and is relatively distant from the key services and facilities such as the train station, and employment opportunities. Other sites are located nearer to key services. 5.44. A high level assessment of some of the proposed allocations shows that some proposals are at risk and hence one of the reasons why Best Practice suggests a buffer to the housing requirement should be included in the Plan. Furthermore, would appear to have leant heavily on allocating sites that already have planning permission as an alternative to identifying a sufficient supply of new allocation sites to meet its requirement for the plan period. Consequently, a number of settlements with strong sustainability credentials would appear to have insufficient allocations to meet their needs through the life of the plan. 5.45. It would appear in some instances that there are unrealistic assumptions on gross to net developable site areas and on the resultant yields from proposed allocations, especially when considering some of the development requirements. Avant Homes therefore suggest that further
sites should be identified. 5.46. The Council therefore need a wider choice of sites across a number of different areas and market areas to gain traction and increase build rates. To achieve the housing requirement the Council need at least 30-35 housing outlets operating across the Borough for every year of the Plan and Avant Homes do not believe the Plan can deliver this, particularly in the middle to later years. 5.47. Avant Homes considers the Council should be more realistic on the potential delivery on sites, particularly on sites which have not commenced preparations of securing the relevant planning permission and developer interest and on build rates. Avant Homes consider that the sites with no planning permission should not be providing completions until 2023/24 (which is two years post adoption) as there is significant work and preparations to commence on site, including time to prepare and submit the planning application, gain planning permission, discharge conditions, legal agreements, site preparations, and commence house building. This process can take around 2 years. 5.48. Avant Homes would be happy to work through the specific sites in detail with the Council to seek to reach agreement on the HELAA and current housing commitments. Interestingly, in line with the general direction of travel for this Local Plan the new Framework (2019) defines the term Deliverable in the glossary stating that sites can only be considered deliverable where they have detailed planning permission. If they have outline planning permission or are located in a plan a site can only be considered if there is clear evidence that housing completions will begin on site within five years. The level of evidence that must be provided to demonstrate that sites are deliverable has therefore been tightened. 5.49. Avant Homes considers that the main risks to the delivery of the housing requirement are slippages in the delivery of allocations, longer lead-times, reduced housing capacity on sites, sites no longer coming forward as result of viability from policy obligations set out in the Local Plan. Given these risks Avant Homes would suggest a greater flexibility is incorporated into the Local Plan especially in light of Avant Homes' conclusions on the actual housing requirement. 5.50. Avant Homes would encourage the Council to review the existing commitments to ensure this is still deliverable, whether there is a housebuilder on board and whether there are any constraints preventing development from coming forward. Avant Homes would also ask the Council to look at the proposed delivery of site allocations to determine whether the delivery rates are appropriate and the sites are deliverable in light of the policy obligations proposed in the Local Plan. 5.51. Taking into account the above, the Council should be making provision for: Annual Housing Requirement Council Figures: 920 Avant Homes' View: 1,100 Total Requirement (2015-2035) - which is 15 years post adoption Council Figures: 18,400 Avant Homes' View: 22,000 Completions Council Figures: 3,400 Avant Homes' View: 3,211 Total Commitments Council Figures: 9,488 Avant Homes' View: 9,488 Non-Delivery Allowance (at least 10%) Council Figures: 948.8 Avant Homes' View: 948.8 Total Allocations Council Figures: 6,567 Avant Homes' View: 6,567 Total Supply Council Figures: 18,506 Avant Homes' View: 18,317.2 Residual homes to be identified Council Figures: -106.2 Avant Homes' View: 3,682.2 5.52. Therefore, on a best case scenario Avant Homes consider as a minimum there needs to be circa 3,682 new homes to be identified in the Plan to account for net completions, and economic growth. 5.53. This does not account for the uplift required to ensure affordable housing need is met in full, which as indicated in paragraph 5.28, would lead to a requirement of 1,393 dpa and a plan requirement of 27,860. Based on the current supply of 3,211 completions, 9,488 commitments, an allowance for 10% non-implementation, and the currently proposed allocation of 6,567 homes, this would lead to need for a further 9,542 additional homes. 5.54. Significantly, the above scenario does not balance housing provision with the additional employment allocations. The additional employment allocations amount to 83.77 hectares above the requirement, this is the equivalent of an additional 3.5 years supply of land. As a result in order to balance the housing provision with the additional employment supply circa 3,850 additional homes would be required, this amounts to an annual requirement of 1,292.5 dpa. Avant Homes consider circa 7,532 additional homes are required in order to balance the Housing with Employment supply, account for net completions and appropriate non-implementation rates. Employment requirement 2015-2035 Avant Homes' View: 481 hectares Annual employment requirement Avant Homes' View: 24 hectares Employment land developed 2015-2018 Avant Homes' View: 117 Sites with planning permission Tables E1 to E8 Avant Homes' View: 284.09 New employment allocations Policy 4 Avant Homes' View: 164.68 Total Allocations Avant Homes' View: 565.77 Amount of land allocated over the requirement Avant Homes' View: 83.77 Additional homes required to balance with employment land supply Avant Homes' View: 3,850 Residual homes to be identified Avant Homes' View: 7,532.2 5.55. These figures assume no changes to the currently identified housing sites, which, in response to policy 3 and policy 6, Avant Homes have raised significant concerns, particularly with regards the deliverability, capacity, and delivery rates of some sites and the overreliance on existing permissions or longstanding allocations. This does not account for additional economic growth associated with the airport. 5.56. Furthermore, there does not appear to be any safeguarded sites or genuinely deliverable reserve sites identified within the Draft Plan. This is concerning given Policy 6 states that the Plan will designated Reserve Development Sites. However, it states that the reserves sites identified are not considered developable in the plan period. Paragraph 4.43 of the Plan indicates that the reserve sites have flood risk mitigation issues or safeguarding issues associated with HS2 preventing them from coming forward. Avant Homes would suggest, in order to assist with flexibility, that safeguarded sites be proposed in accordance with national guidance. The only other reserve site is related to direct job growth at the Airport and is strictly controlled, thus does not provide flexibility for the Plan as a whole. 5.57. The above scenarios do not include a detailed analysis of existing commitments and proposed allocations, however from a high level analysis it is evident that the Council's trajectory and analysis of sites is optimistic. 5.58. Therefore, with an increased housing requirement, reduced potential from existing planning permissions sites and incorporation of a flexibility allowance, further land will need to be identified. 5.59. Avant Homes consider that the appropriate areas and sites to accommodate growth would be: - Site 494: Green Lane, Scawthorpe, Doncaster - New Site: Melton Road, Newton, Doncaster - HELAA Site (871): Wadworth Hill, Wadworth 5.60. A brief summary is provided for these sites in response to Policy 6. Technical information and an advocacy report for each site will submitted shortly. The Advocacy Report will show a masterplan and vision for the proposed scheme and outlines the potential of the scheme. This report will be supported by significant technical information and the report will demonstrate that the sites are available, suitable and achievable and therefore deliverable in accordance with the Framework and PPG. 5.61. Avant homes consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 5.62. However, Avant Homes consider that with an appropriate uplift to the housing requirement, consideration of net completions, non-implementation rates and the allocation of additional land and safeguarded sites that the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 5.63. To overcome the objection and address soundness matters, the Council should: - Increase housing requirement to 1,100 to 1,300 dwellings over the plan period. - Reduce the potential from current commitments and include a non-delivery allowance. -Identify safeguarded land. - Allocate: o Site 494: Green Lane, Scawthorpe, Doncaster o New Site: Melton Road, Newton, Doncaster o HELAA Site (871): Wadworth Hill, Wadworth
The Local Plan housing requirement is not sufficient and not fully aligned with forecast economic growth. It identifies significantly more employment land than the target for provision established in Policy 3. There is a significant mismatch between employment land allocations and housing land allocations. The identified supply is insufficient to meet the Council’s identified requirement. Regeneris Consulting have reviewed the housing requirement of 18,400 dwellings over the plan period / 920 dpa. They found that the PBA report made unjustified and unrealistic assumptions for a number of factors which supress the level of housing required to support future employment growth. Specifically disagree about assumptions on commuting, double jobbing and household formation (report supplied). The report considers that Doncaster has one of the fastest growing economies in Yorkshire and the Humber and has created 24,000 jobs 2000 - 2017 (1.1% pa). Its key asset is connectivity by rail, air and road which is highly attractive to investors, especially industrial and logistics occupiers. Over 1.1m sq m of industrial / warehousing land has been taken up since 2010. There has been a significant improvement in key economic indicators, including skills and level of enterprise.

The business start up rate has not doubled since 2010 and is in line with the national average, thus removing a key barrier to growth. There continues to be demand for industrial space in Doncaster and strong potential to accommodate high levels of inward investment in future, which would drive jobs growth. Given this, not enough homes are being planned for, and there needs to be a more appropriate balance between housing provision and economic ambitions. It is clear from the framework that the standard method is a starting point and a minimum, not a housing requirement figure itself. It is also clear that the affordability adjustment within the standard methodology is just to ensure that the minimum housing needs starts to address affordability of homes. It therefore does not fully address affordability issues. There may be exceptional circumstances for planning for more housing. The Council need to recognise that the development of new housing will bring economic benefits to the area. New housing can support economic growth both through direct job creation through construction and through increased population, which will create sustainable jobs and increased goods / services demand. This provides an important sustainable development opportunity. The HBF report that housebuilding is worth #38bn p/a (England and Wales) and supports 700,000 jobs. House building supports the economy in a wider sense through being drive for economic growth; delivering jobs and economic value; supporting labour market mobility; creating skills and employability; enhancing place competitiveness; creating quality of place and reusing brownfield land. The report concludes that a healthy, well-functioning labour market requires a good supply of housing that is affordable for local people to enable them to move jobs freely and match up skills supply with employer demand. A dysfunctional housing market can inhibit labour market mobility, in turn stifling economic growth. Regeneris consider the housing need should be 1,100dpa to support economic growth. 920 dpa risks constraining the future economic growth of Doncaster. Furthermore jobs are only forecast 2015 - 32, it is unclear what consideration has been given to expected job growth to the end of the plan period and therefore it is considered possible that the jobs led target underestimates the need over the full plan period. There is a discrepancy between para. 4.61 and Tables E1 - E8 and the numbers stated (481ha vs. 565.77ha), and there is also additional employment land available according to tables E1 - E8. There is a significant mismatch between the level of planned employment provision in Policy 4 and planned housing. The housing requirement needs to be uplifted to reflect the employment land provision. Net completions 2015 - 18 amount to 3,211 and have been consistently higher than the Local Plan target. This shows there is sufficient demand to support a requirement above 920dpa. PBA calculated 1,073 in an earlier approach and advised it is prudent to plan for between 562 and 1,073. 1% employment growth would support a target at the top of this range. There is therefore evidence of higher delivery of housing and a higher need. PPG is clear this evidence should be taken into account when determining the housing requirement. 912dpa is not based on jobs growth over the full plan period. Furthermore, there is evidence the affordable housing needs in the borough cannot be met based on a target of 920. Affordable housing delivery is below 23% even against higher rates of deliver than 920dpa. Concern that 920 will not deliver the affordable housing needed. To deliver 209 affordable dwellings per annum, 1,393 dpa would be needed, assuming an average of 15% affordable housing (the highest achieved over the past 3 years). There is sufficient evidence for an uplift to the housing figure. The policy is not justified or consistent with the framework and the plan is currently unsound. The requirement should be at least 1,100 to meet economic growth ambitions and balance housing / job aspirations and ensure the needs for affordable homes can be met (up to 1,393 dpa). Concern that the Council’s approach to delivering the housing requirement does not reflect national guidance. There is insufficient flexibility in the supply of land to meet the identified needs in full. The framework is clear plans should be flexible to adapt to rapid change and emphasises the importance of ensuring that a sufficient amount and variety of land can come forward when needed. The plan period requirement is 18,400, with 3,400 completions and allocations equating to 15,000 dwellings. This provides a flexibility of 5% (1,055 dwellings), which is insufficient given the potential for non delivery and under delivery of sites - particularly from dependency on a number of large sites. Some policies may undermine delivery (especially 8, 46, 66 and 67) or lead to the need for further site specific viability testing which impacts on the timing of delivery and therefore means greater flexibility is required. It is noted that supply attributed to commitments appears to be gross not net. The plan indicates completions of 3,400 but according to the RLA reports, net completions are 3,211. This would leave the residual requirement based on 920dpa to at least 15,189 and reduce flexibility in the plan to 866 dwellings (4.7%). The trajectory shows the council would struggle to maintain a continuous supply over the plan period, especially later on. The RLA is also not up to date and needs updating. 100% deliverability of commitments should not be assumed, there should be at least a 10% discount, according to best practice and guidance. This is supported with higher levels of discounting for larger sites to account for unforeseeable circumstances and delivery delays. Out of 9,488 plots, there should be a discount of c. 948, however it could be higher given concerns about some deliverability. Concern with reliance on commitments especially as some are historic brownfield sites with viability concerns in challenging marker areas, some of which also constrained by flood risk. Evidence of developer interest in such sites should be a fundamental requirement to provide confidence on delivery. Concerning sites include: Site Ref: 838 Site Name: Hexthorpe No. of Dwellings: 930 Avant Homes Comment: There have been a number of planning applications and proposed schemes over the years, but there has been no delivery on site. Countryside PLC has submitted a planning application which the Environment Agency has objected to and recommended refusal. There is conflicting evidence in terms of delivery rates, with the Local Plan and the HELAA. There are significant flooding constraints affecting the site. No further deliverability evidence has been produced in the Doncaster 5 Year Deliverable Housing Land Supply Statement. The Residential Land Availability Study notes that at 31/03/2018 there were no completions and the site is not currently being developed. Site Ref: 843 Site Name: Manor Farm, Bessacarr No. of Dwellings: 1,009 Avant Homes Comment: This is a Persimmon / Charles Church scheme. However, delivery has become frustrated by the need to deliver infrastructure to complete development. Since there is only one developer on the site the development trajectory is likely to be modest and development of the site is unlikely to be achieved during the plan period. The Residential Land Availability Report indicates 39 completed in 17/18 which is below the rates expected in the Local Plan and HELAA. Which assumes delivery rates of around 70 dwellings a year. This is not realistic based on current delivery. Site Ref: 418 Site Name: Unity/DIN Initiative No. of Dwellings: 905 Avant Homes Comment: The site has outline planning permission for 3,100 homes and no reserved matters have been submitted. The site is in significant multiple ownershi which is below the rates expected in the Local Plan and HELAA. Which assumes delivery rates of around 70 dwellings a year. The Residential Land Availability Report indicates 39 completed in 17/18 which is below the rates expected in the Local Plan and HELAA. Which assumes delivery rates of around 70 dwellings a year. This is not realistic based on current delivery.
175 completions in the first five years. Higher rates of delivery are expected in the following years (70 dwellings per annum). These rates are overly optimistic especially when compared to annual completions for individual sites recorded in the residential land availability report. Site Ref: 569 Site Name: Askern Saw Mills No. of Dwellings: 220 Avant Homes Comment: This is a long standing, unimplemented planning permission that has been available but has remained undeveloped. There is no developer interest and consequently the assumed delivery of 220 new homes is optimistic. Indicated in the Residential Land Availability Report that the outline permission has lapsed. Site Ref: 984 Site Name: Former McCormick Tractors No. of Dwellings: 690 Avant Homes Comment: This site has significant constraints. There is an outline permission relating to the development of the site. The Local Plan assumes a delivery rate of 56 dwellings per in the first five years and 64 dwellings per annum in the following years. This is overly optimistic and not consistent with the planning status and constraints on site. Site Ref: 940 E1 and E2 Site Name: Land east of Poplars Farm No. of Dwellings: 280/920 Avant Homes Comment: Site 940 is allocated in the plan for development of up to 280 dwellings (Part E1), Part E2 is identified as a reserved housing site for up to 920 dwellings. This site does not form a true reserve site. The council have identified a release mechanism which restricts the release of housing to net additional jobs delivered at the airport. Sites which are unavailable or unknown should not be included, such as: Site Ref: 1028 Site Name: Tickhill No. of Dwellings: 74 Avant Homes Comment: This site does not have access, therefore cannot be considered to be deliverable. Further, the capacity of the site is unrealistic. This is a 1.5 hectare site, a capacity of 44 dwellings would reflect the assumptions on net to gross developable area and density set out in the Viability Study. Site Ref: 662/247 Site Name: Colliery Site, Rossington No. of Dwellings: 897/237 Avant Homes Comment: The delivery rates on the site are overly optimistic. In 2017/18 there were only 49 completions on site 662. Assuming delivery rates based on past performance at this site then it is considered that only 600 dwellings will be capable of coming forward within the Plan period. This is significantly less than the 1127 homes forecast within the Plan. Site Ref: 081/343 Site Name: Thorne No. of Dwellings: 207 Avant Homes Comment: This is a longstanding allocation and there is little evidence available through the council's evidence base to demonstrate that there is developer interest or that the site will come forward in the short term. Site Ref: 795 Site Name: Thorne No. of Dwellings: 33 Avant Homes Comment: This is a narrow and constrained infill site, with railway forming the southern boundary of the site. There is little evidence available through the Councils evidence base to indicate any developer interest in the site. Site Ref: 165/186 Site Name: Carrcroft No. of Dwellings: 300 Avant Homes Comment: This site is located to the western edge of the settlement and is relatively distant from the key services and facilities such as the train station, and employment opportunities. Other sites are located nearer to key services. A high level assessment shows some proposals are at risk and hence why a buffer is required. Furthermore, existing permissions are heavily relied on as an alternative to identifying a sufficient supply of new allocations. Consequently, a number of sustainable places have insufficient allocations to meet their needs throughout the plan period. There are also unrealistic assumptions on gross to net deliverable site areas and proposed yields especially given developer requirements. Further sites are therefore needed. The Council therefore need a wider choice of sites across a number of different areas and market areas to gain traction and increase build rates. To achieve the housing requirement the Council need at least 30-35 housing outlets operating across the Borough for every year of the Plan. Do not believe the plan can deliver this, especially in later years. The council should be realistic on delivery of sites, especially those which have not commenced preparations for securing relevant planning permissions. and developer interest on build rates. Sites without permission should not be providing completions until at least 2023/24. Those with permission must have clear evidence of deliverability. Flexibility must be built in and commitments reviewed check deliverability, house builders on board and what constraints exist. Delivery rates must also be reviewed to check sites are deliverable in light of policy obligations. The council should make provision for: Annual Housing Requirement Council Figures: 920 Avant Homes' View: 1,100 Total Requirement (2015-2035) - which is 15 years post adoption Council Figures: 18,400 Avant Homes' View: 22,000 Completions Council Figures: 3,400 Avant Homes' View: 83.77 Additional homes required to balance with employment land supply. The Employment requirement 2015-2035 Avant Homes' View: 165/186 Site Name: Carcroft Avant Homes' View: 3,211 Total Commitments Council Figures: 9,488 Avant Homes' View: 9,488 Non-Delivery Allowance (at least 10%) Council Figures: 948.8 Avant Homes' View: 948.8 Total Allocations Council Figures: 6,567 Avant Homes' View: 6,567 Total Supply Council Figures: 18,506 Avant Homes' View: 18,317.2 Residual homes to be identified Council Figures: -106.2 Avant Homes' View: 3,682.2 Best case, there must be c.3682 new homes to be identified in the Plan to account for net completions, and economic growth. This does not account for the uplift required to ensure affordable housing need is met in full, which as indicated in paragraph 5.28, would lead to a requirement of 1,393 dpa and a plan requirement of 27,860. Based on the current supply of 3,211 completions, 9,488 commitments, an allowance for 10% non-implementation, and the currently proposed allocations of 6,567 homes, this would lead to need for a further 9,542 additional homes. The above scenario does not balance housing and employment. The additional employment allocations amount to 83.77 hectares above the requirement, this is the equivalent of an additional 3.5 years supply of land. As a result in order to balance the housing provision with the additional employment supply circa 3,850 additional homes would be required, this amounts to an annual requirement of 1,292.5 dpa. Avant Homes consider circa 7,532 additional homes are required in order to balance the Housing with Employment supply, account for net completions and appropriate non-implementation rates. Employment requirement 2015-2035 Avant Homes' View: 481 hectares Annual employment requirement Avant Homes' View: 24 hectares Employment land developed 2015-2018 Avant Homes' View: 117 Sites with planning permission Tabels E1 to E8 Avant Homes' View: 284.09 New employment allocations Policy 4 Avant Homes' View: 164.68 Total Allocations Avant Homes' View: 565.77 Amount of land allocated over the requirement Avant Homes' View: 83.77 Additional homes required to balance with employment land supply. Avant Homes' View: 3,850 Residual homes to be identified Avant Homes' View: 7,532.2 Assuming no changes to the housing supply, which there are also concerns about, or airport economic growth. There should also be safeguarded land. Avant Homes consider that the appropriate areas and sites to accommodate growth would be: - Site 494: Green Lane, Scawthorpe, Doncaster - New Site: Melton Road, Newton, Doncaster - HELAA Site (871): Wadworth Hill, Wadworth - Increase housing requirement to 1,100 to 1,300 completions over the plan period. - Develop the potential from 690 to 7532.2 homes. - Develop the potential from 984 to 164.68 hectares. - Identify safeguarded land. - Allocate: - Site 494: Green Lane, Scawthorpe, Doncaster - New Site: Melton Road, Newton, Doncaster - HELAA Site (871): Wadworth Hill, Wadworth

Response:
The Peter Brett’s report assesses the employment and housing target for the borough and ties the two together to ensure the right amount of houses are provided for the projected growth. The Council are confident that this report provides a sound and realistic figure. Many ways have been submitted to the Council about how the housing and employment figures could be derived. The submission Local Plan included a range, but still plans for enough housing to meet the requirement of 920dpa over the plan period - the use of a range does not prejudice this. 920dpa is the assessed level of housing required under the revised NPPF, 1,073 refers to the figure using the previous NPPF, which is now redundant. It should also be noted the PBA report states a mid-way point between 585 and 920 could be used, which the Council elected not to do. The Local Plan is planning for 57% more housing than the Standard Methodology proposed, and in doing so the Council have taken on board national policy and guidance. The jobs requirement covers the period 2015 - 35, and enough housing is planned for to match this - there is no reason to uplift this further, including for affordable housing. There is additional flexibility in housing deliver, as the plan does not factor in to its calculations windfalls; sites of 1-4 units; any development in Defined Villages; the proposed 280 dwellings at the airport + possible 920 further linked to job delivery; and the potential of Reserve Development Sites to deliver housing. If all these are factored in, then there is a total potential supply of
24,880 + future windfalls and potential empty homes coming into use, which is 6,480 above the 20 year requirement of 18,400, or in effect a buffer of 35%. Trajectories and other matters raised or covered in the Housing Topic Paper. The RLA has been updated for 2019 now. Consideration has been given to site constraints and delivery, and factored in where appropriate. With regards to site 494, it is not felt that exceptional circumstances exist to justify the release of this site, as set out in the Green Belt Topic Paper. 871 is in a Defined Village where no new allocations are being made.
There is a significant mismatch between the level of employment land allocated and the target for provision established in Policy 3. There is a significant mismatch between the level of employment land allocated and the level of housing land allocated in the Plan period; and - The identified supply is not sufficient to meet the Councils identified requirement. Need 5.4. Avant Homes is concerned with the proposed level of new housing being planned for in the Local Plan. Policy 3 makes provision for 18,400 dwellings to be delivered between 2015 and 2035, equivalent to 920 net new homes each year. Policy 3 states that there should be sufficient allocations for 15 years supply, which is 13,230 new homes. 5.5. Avant Homes has commissioned Regeneris Consulting to review the OAN and the Economic Forecasts and Housing Needs Assessment (2018). The Regeneris report is attached to these representations. Regeneris conclude that: - The target delivers the minimum level of housing need for Doncaster based on the standard method (585 dpa) and makes an upward adjustment to support economic growth. - The upward adjustment was based on evidence produced by PBA which recommended housing need is presented as a range between 585 dpa (the minimum) and 912 dpa. The upper limit was based on matching jobs growth aspirations of the Sheffield City Region LEP (1,420) over the period 2016 to 2026. - However, PBA have made unjustified and unrealistic assumptions about commuting, double jobbing and household formation rates. (See EMAIL FOR Regeneris Report) 5.6. Regeneris consider that: - Doncaster has been one of the fastest growing economies in Yorkshire and Humbers. The district has created around 24,000 jobs between 2000 and 2017, representing a growth rate of 1.1% p.a - Doncaster’s key asset is its connectivity by road, rail and air which has made it a highly attractive location for inward investment, particularly for industrial and logistics occupiers, with over 1.1m sq m of industrial/warehouse space taken up since 2010. - The strong performance is also due to a significant improvement in key economic indicators, including skills and levels of enterprise. The business start-up rate has more than doubled since 2010 and is now in line with the national average. These improvements have removed a key barrier to growth and mean that Doncaster is well placed to continue its high rate of growth. - The Local Plan has set a target of delivering 481 hectares of employment land between 2015 and 2035 and a number of ERL’s shows there continues to be very strong market demand for industrial space in Doncaster. There is therefore strong potential for Doncaster to accommodate high levels of inward investment in future which would also drive jobs growth. 5.7. Avant Homes have concerns that the proposed housing requirement does not represent an appropriate figure once consideration is given to the potential for economic growth and job formation. Avant Homes continue to consider that an appropriate balance should be sought between employment growth aspirations and the provision of homes. 5.8. The Framework (2019) reaffirms the Governments’ commitment to ‘significantly boosting the supply of homes’ and states that ‘it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed’. It goes on to state ‘to determine the minimum number of homes need, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify and alternative approach which also reflects current and future demographic trends and market signals’. 5.9. NPPG is clear that the standard method identifies a minimum annual housing need figure and that it does not produce a housing requirement figure Paragraph 002 Reference ID: 2a-002-20190220. It is also clear that the affordability adjustment within the standard methodology is just to ensure that the minimum housing needs starts to address affordability of homes. It therefore does not fully address affordability issues. Paragraph 006 Reference ID: 2a-006-201902020. 5.10. NPPG goes on to identify the circumstances when it is appropriate to plan for a higher housing need figure than the standard methodology identifies. The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides the minimum starting point in determining the number of homes needed in an area?It does not predict the impact of future government policies, changing economic circumstances or other factors that might have an impact on demographic behaviour. Therefore there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicate. 5.11. This need will be assessed prior to and separate from, considering how much of the overall need can be accommodated. Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: 5.12. Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth 5.13. Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; 5.14. An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground. 5.15. There may, occasionally be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced SHMA) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need that the standard model suggests'. Paragraph 010 Reference ID: 2a-010-20190220. 5.16. The Council need to recognise that the development of new housing will bring forward additional economic benefits to the area. The relationship between economic performance in an area and housing is complex, but having the right quantity, quality and balance.
of housing in an area is necessary for economic growth. The development of new housing can therefore support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population which will create sustainable local jobs from the increased demand for goods and services. This provides an important sustainable development opportunity for Doncaster. 5.17. Importantly the HBF released in July 2018 its report on “the economic footprint of house building in England and Wales”, which shows that house building in England and Wales is now worth #38bn a year and supports nearly 700,000 jobs. House building activity contributes economically in different ways including providing jobs, tax revenue and contributing funding for local infrastructure and communities. House building supports the economic in a wider sense through being drive for economic growth; delivering jobs and economic value; supporting labour market mobility; creating skills and employability; enhancing place competitiveness; creating quality of place and reusing brownfield land. 5.18. An important conclusion of the report and the wider economic benefits is that a healthy, well-functioning labour market requires a good supply of housing that is affordable for local people to enable them to move jobs freely and match up skills supply with employer demand. A dysfunctional housing market can inhibit labour market mobility, in turn stifling economic growth. 5.19. Regeneris consider that Doncaster’s housing need over the plan period should be 1,100 dpa to support future economic growth. Regeneris consider that the target of 920 dpa would risk constraining the future economic growth of Doncaster. 5.20. Furthermore, it is evident that the council are seeking to align economic growth with housing growth and have identified provision above the local housing need figure to which the council considers accounts for Job Led growth. However, the jobs led growth figure is based on jobs growth forecast between 2015-2032. It is not clear whether consideration has been given to the additional job growth expected to the end of the plan period. Therefore Avant consider there is potential for the jobs led scenario to underestimate the jobs growth over the full plan period. The associated uplift to the housing requirement will therefore not be sufficient to meet the full needs over the plan period. 5.21. Additionally, the Council have identified a requirement for 481 hectares of employment land based on the Job Led scenario, and accounting for the extended plan period between 2032 and2035. The explanatory text considers that this requirement is met through 117 hectares of allocated land developed between 2015-2018, 201 hectares of land benefiting from planning permission, and 164 hectares of allocated hectares. However, there is a discrepancy between the totals in paragraph 4.61 of the Plan and the figures arising from Tables E1 to E8. The sites that benefit from planning permission in tables E1 to E8 equate to 284.09 ha of employment land available within the Plan period. This leads to a total provision of 565.77 hectares of employment land against a requirement of 481 hectares. It should be noted that within the permissions identified in tables E1 to E8 that additional employment land is available, adding to the potential supply. There is therefore a significant mismatch between the level of planned employment provision in Policy 4 and the planned housing provision. Therefore, the housing requirement needs to be uplifted to reflect the identified level of employment land provision. 5.22. As stated above NPPG indicates that consideration can be given to delivery rates, for the last three years completions have been consistently higher than the proposed local plan target. Net completions amount to 3211 dwellings, with annual completions as follows: Year: 2015-16 Net Completions: 1,025 Year: 2016/17 Net Completions: 1,049 Year: 2017/18 Net Completions: 1,137 Year: Total Net Completions: 3,211 5.23. This demonstrates that there is sufficient demand to support a requirement above 920 dwellings per annum. 5.24. The Councils Economic Forecasts and Housing Needs Assessment (PBA, 2018) considers the housing requirement prior against both the standard methodology, standard methodology with an uplift for economic growth and previous approach for identifying housing need. Following the earlier approach, PBA consider that an aspirational job led figure, based on the SEP ambitions, would equate to a requirement of 1,073. PBA considered that it would be prudent to plan for between 562 and 1073. To ensure that the requirement was realistic. It is worthy of note that the Employment Land Needs Assessment (2019). Considers that the Job led scenario was ambitious but realistic and notes the significant growth in Doncaster within the previous 15 years in line with SCR growth aspirations. And further the evidence of land take up and jobs growth for the period 2015-2018 was on target to meet 1% jobs growth per annum. This would support a target at the higher end of the range. 5.25. There is therefore evidence of both delivery at a higher rate and recently published evidence that indicates a higher need for housing. As stated above NPPG is clear that this evidence should be taken into account when determining the housing requirement. 5.26. When using the standard method the housing need figure was 585, applying a job led figure to match the SEP led to a requirement of 912 (PBA, 2018). However this is not based on the Jobs growth over the full plan period. 5.27. Avant Homes consider further evidence is required to demonstrate whether the affordable housing needs of Doncaster can be met based on a target of 920. The explanatory text states that the current need for affordable housing, 209 affordable units, represents 23 % of the Local Plan requirement for housing. Paragraph 6.9 states that this does not take into account current completions or viability. The completions affordable for the last three years (first three years of the Local Plan) are as follows: Year: 15/16 Affordable Completions: 151 Total Completions: 1,088 Affordable completions (%): 13.88 Year: 16/17 Affordable Completions: 161 Total Completions: 1,067 Affordable completions (%): 15.09 Year: 17/18 Affordable Completions: 166 Total Completions: 1,208 Affordable completions (%): 13.74. The total affordable completions falling below the identified affordable need, even when total completions are higher than the proposed Local plan requirement of 920. Further, Policy 8 identifies a requirement for 23% affordable housing in high/medium value areas and 15% in low value areas. An as indicated in response to Policy 8 and Policy 67, this is demonstrated to be unviable for a number of sites, including all types of sites in low value areas. Avant Homes are therefore concerned that a target of 920 dwellings will not deliver sufficient number and range of affordable homes to meet the identified need for affordable homes in the Borough. In order to deliver 209 affordable dwellings per year, a requirement of at least 1,393 would be required. This assuming the achievement of an average of 15% affordable housing, which represents the highest achieved over the last three years of monitoring. 5.29. Avant Homes consider that there is sufficient evidence to pointing to the need for further uplift in the Local Plan housing requirement, based on the significant mismatch between housing and employment land allocations, the need to support the local plans economic ambitions, evidence of delivery and the need to ensure sufficient delivery of affordable housing. 5.30. Avant homes consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance do not not consider the Council's Local Plan in its current form to be sound. 5.31. However, Avant Homes consider that with a higher requirement, of at least 1,100 to meet the economic growth aspirations, and further uplifts to balance housing allocations with the employment land allocations, and to ensure that the needs for affordable homes can be met (up to 1393) that the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan Housing Supply and Delivery 5.32. Avant Homes is concerned that the Council’s approach to delivering the housing requirement does not appear to reflect national guidance. 5.33. The Council is not demonstrating sufficient flexibility in the supply of housing land to ensure that the Plan can meet identified needs in full. The Framework is clear that plans should be sufficiently flexible to adapt to rapid change, and emphasises the importance of ensuring that a sufficient amount and variety of land can come forward where it is needed. 5.34. PPG is clear that careful attention should be given to providing an adequate supply of land, and the Plan needs to be realistic about what can be achieved and when. Authorities need to ensure that policies setting out contributions expected from development do not undermine the deliverability of the Plan. (Paragraph 59 Reference ID: 61-059-20190315. 5.35. At present based on the Councils figures presented in the Local Plan, a Plan requirement of 18400, completions equating to 3400 and allocations equating to 16,055, there is a flexibility of around 1055 dwellings which equates to 5% of the Local Plan Requirement. Avant Homes consider that this is insufficient given the potential for non-delivery and under delivery of sites, particularly from the dependency on a number of large sites. As set out in our response to a number of policies within the plan and specifically Policies 8, 46, 66 and 67, Avant Homes are concerned that some of the policies may undermine the
deliberativity of sites, or lead to the need for further site specific viability testing impacting on the timing of delivery and therefore there is a need for greater flexibility in the housing supply. Specific sites are identified later in this section. 5.36. Avant Homes have a number of concerns relating to the supply in the Plan in terms of completions, the allocations from permissions and the new allocations. 5.37. It is noted that the supply attributed to completions appears to be resultant from gross completions rather than net completions. The Plan indicates that completions between 2015 and 2018 equate to 3400, However data in the Residential Land Availability Report indicates that net completions amount to 3211. Which would serve to increase the residual requirement based on an OAN of 920 to at least 15,189, and reduce the flexibility in the Plan to 866 dwellings (4.7%). 5.38. With regards to overall supply from permissions and allocations, a housing trajectory has been provided. Avant Homes are concerned that this demonstrates that the Council will struggle to maintain a continuous supply of housing particularly in the later phases of the Plan period. Only four sites are identified as being capable of delivery in the final years of the plan period and two sites delivering beyond the plan period. 5.39. Furthermore, the Council’s HELAA and Residential Land Availability Report have a base date of March 2018, thus a whole monitoring year is presently absent. This evidence base should therefore be updated. 5.40. In terms of existing commitments it appears that the Council assumes 100% delivery and no discount has been applied. Best Practice and Guidance suggests that at least a 10% discount should be applied on sites with extant planning permission but this could vary depending on site specific constraints and complexity. Avant Homes supports the discounting of sites with planning permission but consider it may be beneficial to include a higher level of discount for large sites to take into account unforeseen circumstances and delay delays. Avant Homes consider therefore that from a commitments pot of 9,488 dwellings a discount of at least circa 948 should be applied, however this could feasibly be higher given the history and constraints of a number of sites. 5.41. Avant Homes is concerned with the reliance on some existing housing sites with planning permission and their potential delivery, particularly as some are fairly historic brownfield sites with viability concerns in market challenging areas. There are a considerable number of outstanding planning permissions in poor market areas, some of which are also constrained by flood risk. Evidence of developer interest in such sites should be a fundamental requirement to provide confidence on delivery. For example, a brief review of some sites shown as commitments shows considerable concern: Site Ref: 838 Site Name: Hexthorpe No. of Dwellings: 930 Avant Homes Comment: There have been a number of planning applications and proposed schemes over the years, but there has been no delivery on site. Countryside PLC has submitted a planning application which the Environment Agency has objected to and recommended refusal. There is conflicting evidence in terms of delivery rates, with the Local Plan and the HELAA. There are significant flooding constraints affecting the site. No further deliverability evidence has been produced in the Doncaster 5 Year Deliverable Housing Land Supply Statement. The Residential Land Availability Study notes that at 31/03/2018 there were no completions and the site is not currently being developed. Site Ref: 843 Site Name: Manor Farm, Bessacarr No. of Dwellings: 1,009 Avant Homes Comment: This is a Persimmon / Charles Church scheme. However, delivery has become frustrated due to the need to deliver infrastructure to complete development. Since there is only one developer on the site the development trajectory is likely to be modest and development of the site is unlikely to be achieved during the plan period. The Residential Land Availability Report indicates 39 completed in 17/18 which is below the rates expected in the Local Plan and HELAA. Which assumes delivery rates of around 70 dwellings a year. This is not realistic based on current delivery. Site Ref: 418 Site Name: Unity/DN7 Initiative No. of Dwellings: 905 Avant Homes Comment: The site has outline planning permission for 3,100 homes and no reserved matters have been submitted. The site is in significant multiple ownership and understand that CPO procedures will be employed to facilitate the delivery of extensive infrastructure. Homes England is also assigning public funding to support the development. Given the presence of multiple landowners, the need for considerable public funding, the likelihood of a protracted timeframe to open up the site for development and the absence of confirmed market interest, the site is unlikely to deliver the Council’s prediction of 1015 homes in the plan period. The HELAA does not anticipate a start on site until years 6 to 10. However the local plan indicates a 175 completions in the first five years. Higher rates of delivery are expected in the following years (70 dwellings per annum). These rates are overly optimistic especially when compared to annual completions for individual sites recorded in the residential land availability report. Site Ref: 569 Site Name: Askn Saw Mills No. of Dwellings: 220 Avant Homes Comment: This is a long standing, unimplemented planning permission that has been available but has remained undeveloped. There is no developer interest and consequently the assumed delivery of 220 new homes is optimistic. Indicated in the Residential Land Availability Report that the outline permission has lapsed. Site Ref: 984 Site Name: Former McCormick Tractors No. of Dwellings: 600 Avant Homes Comment: This site has significant constraints. There is an outline permission relating to the development of the site. The Local Plan assumes a delivery rate of 56 dwellings per in the first five years and 64 dwellings per annum in this following year. This is overly optimistic and not consistent with the planning status and constraints on site. Site Ref: 940 E1 and E2 Site Name: Land east of Poplars Farm No. of Dwellings: 280/920 Avant Homes Comment: Site 940 is allocated in the plan for development of up to 280 dwellings (Part E1), Part E2 is identified as a reserved housing site for up to 920 dwellings. This site does not form a true reserve site. The council have identified a release mechanism which restricts the release of housing to net additional jobs delivered at the airport. 5.42. Avant Homes understands that no allowance has been made for demolitions. No evidence is apparent and Avant Homes consider it would be appropriate for this evidence to be forthcoming. 5.43. The availability of land is crucial. To be considered deliverable the land needs to be available now and in terms of developable there needs to be a reasonable prospect that land will be available at the point envisaged. Avant Homes consider that sites which are not available or are unknown should not be included in the Plan or a buffer should be provided due to the uncertainty on delivery. Site Ref: 1028 Site Name: Tickhill No. of Dwellings: 74 Avant Homes Comment: This site does not have access, therefore cannot be considered to be deliverable. Further, the capacity of the site is unrealistic. This is a 1.5 hectare site, a capacity of 44 dwellings would reflect the assumptions on net to gross developable area and density set out in the Viability Study. Site Ref: 662/247 Site Name: Colliery Site, Rossington No. of Dwellings: 897/237 Avant Homes Comment: The delivery rates on the site are overly optimistic. In 2017/18 there were only 49 completions on site 662. Assuming delivery rates based on past performance at this site then it is considered that only 600 dwellings will be capable of being completed within the Plan period. This is significantly less than the 1127 homes forecast within this Plan period. Site Ref: 031/62 Site Name: Thorne No. of Dwellings: 207 Avant Homes Comment: This is a longstanding allocation and there is little evidence available through the council’s evidence base to demonstrate that there is developer interest or that the site will come forward in the short term. Site Ref: 795 Site Name: Thorne No. of Dwellings: 13 Avant Homes Comment: This site had permission which has since lapsed. There appears to be little developer interest in this site. The site is not considered to be deliverable. Site Ref: 510 Site Name: Thorne No. of Dwellings: 25 Avant Homes Comment: This is a narrow and constrained infill site, with railway forming the southern boundary of the site. There is little evidence available through the Council’s evidence base to demonstrate the scarcity of interest in the site. Site Ref: 165/186 Site Name: Carcroft No. of Dwellings: 300 Avant Homes Comment: This site is located to the western edge of the settlement and is relatively distant from the key services and facilities such as the train station, and employment opportunities. Other sites are located nearer to key services. 5.44. A high level assessment of some of the proposed allocations shows that some proposals are at risk and hence one of the reasons why Best Practice suggests a buffer to the housing requirement should be included in the Plan. Furthermore, would appear to have hefty allocations on sites that already have planning permission as an alternative to identifying a sufficient supply of new allocation sites to meet its requirement for the plan period. Consequently, a number of sites are not deliverable due to a strong sustainability credentials would appear to have insufficient allocations to meet their needs through the life of the plan. 5.45. It would appear in some instances that there are unrealistic assumptions on gross to net developable site areas and on the resultant yields from proposed allocations, especially when considering some of the development requirements. Avant Homes therefore suggest that further
sites should be identified. 5.46. The Council therefore need a wider choice of sites across a number of different areas and market areas to gain traction and increase build rates. To achieve the housing requirement the Council need at least 30-35 housing outlets operating across the Borough for every year of the Plan and Avant Homes do not believe the Plan can deliver this, particularly in the middle to later years. 5.47. Avant Homes considers the Council should be more realistic on the potential delivery on sites, particularly on sites which have not commenced preparations of securing the relevant planning permission and developer interest and on build rates. Avant Homes consider that the sites with no planning permission should not be providing completions until 2023/24 (which is two years post adoption) as there is significant work and preparations to commence on site, including time to prepare and submit the planning application, gain planning permission, discharge conditions, legal agreements, site preparations, and commence house building. This process can take around 2 years. 5.48. Avant Homes would be happy to work through the specific sites in detail with the Council to seek to reach agreement on the HELAA and current housing commitments. Interestingly, in line with the general direction of travel for this Local Plan the new Framework (2019) defines the term Deliverable in the glossary stating that sites can only be considered deliverable where they have detailed planning permission. If they have outline planning permission or are allocated in a plan a site can only be considered if there is clear evidence that housing completions will begin on site within five years. The level of evidence that must be provided to demonstrate that sites are deliverable has therefore been tightened. 5.49. Avant Homes considers that the main risks to the delivery of the housing requirement are slippages in the delivery of allocations, longer lead times, reduced housing capacity on sites, sites no longer coming forward as result of viability from policy obligations set out in the Local Plan. Given these risks Avant Homes would suggest a greater flexibility is incorporated into the Local Plan especially in light of Avant Homes' conclusions on the actual housing requirement. 5.50. Avant Homes would encourage the Council to review the existing commitments to ensure this is still deliverable, whether there is a housebuilder on board and whether there are any constraints preventing development from coming forward. Avant Homes would also ask the Council to look at the proposed delivery of site allocations to determine whether the delivery rates are appropriate and the sites are deliverable in light of the policy obligations proposed in the Local Plan. 5.51. Taking into account the above, the Council should be making provision for: Annual Housing Requirement Council Figures: 920 Avant Homes' View: 1,100 Total Requirement (2015-2035) - which is 15 years post adoption Council Figures: 18,400 Avant Homes' View: 22,000 Completions Council Figures: 3,400 Avant Homes' View: 3,211 Total Commitments Council Figures: 9,488 Avant Homes' View: 9,488 Non-Delivery Allowance (at least 10%) Council Figures: 948.8 Avant Homes' View: 948.8 Total Allocations Council Figures: 6,567 Avant Homes' View: 6,567 Total Supply Council Figures: 18,506 Avant Homes' View: 18,317.2 Residual homes to be identified Council Figures: 106.2 Avant Homes' View: 106.2. Therefore, on a best case scenario Avant Homes consider as a minimum there needs to be circa 3,682 new homes to be identified in the Plan to account for net completions, and economic growth. 5.53. This does not account for the uplift required to ensure affordable housing need is met in full, which as indicated in paragraph 5.28, would lead to a requirement of 1,393 dpa and a plan requirement of 27,860. Based on the current supply of 3,211 completions, 9,488 commitments, an allowance for 10% non-implementation, and the currently proposed allocations of 6,567 homes, this would lead to need for a further 9,542 additional homes. 5.54. Significantly, the above scenario does not balance housing provision with the additional employment allocations. The additional employment allocations amount to 83.77 hectares above the requirement, this is the equivalent of an additional 3.5 years supply of land. As a result in order to balance the housing provision with the additional employment supply circa 3,850 additional homes would be required, this amounts to an annual requirement of 1,292.5 dpa. Avant Homes consider circa 7,532 additional homes are required in order to balance the Housing with Employment supply, account for net completions and appropriate non-implementation rates. Employment requirement 2015-2035 Avant Homes' View: 481 hectares Annual employment requirement Avant Homes' View: 24 hectares Employment land developed 2015-2018 Avant Homes' View: 117 Sites with planning permission Tables E1 to E8 Avant Homes' View: 284.09 New employment allocations Policy 4 Avant Homes' View: 164.68 Total Allocations Avant Homes' View: 565.77 Amount of land allocated over the requirement Avant Homes' View: 83.77 Additional homes required to balance with employment land supply Avant Homes' View: 3,850 Residual homes to be identified Avant Homes' View: 7,532.2 5.55. These figures assume no changes to the currently identified housing sites, which, in response to policy 3 and policy 6, Avant Homes have raised significant concerns, particularly with regards the deliverability, capacity, and delivery rates of some sites and the overreliance on existing permissions or longstanding allocations. This does not account for additional economic growth associated with the airport. 5.56. Furthermore, there does not appear to be any safeguarded sites or genuinely deliverable reserve sites identified within the Draft Plan. This is concerning given Policy 6 states that the Plan will designated Reserve Development Sites. However, it states that the reserves sites identified are not considered deliverable in the plan period. Paragraph 4.43 of the Plan indicates that the reserve sites have flood risk mitigation issues or safeguarding issues associated with HS2 preventing them from coming forward. Avant Homes would suggest, in order to assist with flexibility, that safeguarded sites be proposed in accordance with national guidance. The only other reserve site is related to direct job growth at the Airport and is strictly controlled, thus does not provide flexibility for the Plan as a whole. 5.57. The above scenarios do not include a detailed analysis of existing commitments and proposed allocations, however from a high level analysis it is evident that the Council's trajectory and analysis of sites is optimistic. 5.58. Therefore, with an increased housing requirement, reduced potential from existing planning permissions sites and incorporation of a flexibility allowance, further land will need to be identified. 5.59. Avant Homes consider that the appropriate areas and sites to accommodate growth would be: - Site 494: Green Lane, Scawthorpe, Doncaster - New Site: Melton Road, Newton, Doncaster - HELAA Site (871): Wadworth Hill, Wadworth 5.60. A brief summary is provided for these sites in response to Policy 6. Technical information and an advocacy report for each site will submitted shortly. The Advocacy Report will show a masterplan and vision for the proposed scheme and illustrates the potential of the scheme. This report will be supported by significant technical information and the report will demonstrate that the sites are available, suitable and achievable and therefore deliverable in accordance with the Framework and PPG. 5.61. Avant homes consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 5.62. However, Avant Homes consider that with an appropriate uplift to the housing requirement, consideration of net completions, non-implementation rates and the allocation of additional land and safeguarded sites that the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 5.63. To overcome the objection and address soundness matters, the Council should: - Increase housing requirement to 1,100 to 1,300 dwellings over the plan period. - Reduce the potential from current commitments and include a non-delivery allowance. - Identify safeguarded land. - Allocate: o Site 494: Green Lane, Scawthorpe, Doncaster o New Site: Melton Road, Newton, Doncaster o HELAA Site (871): Wadworth Hill, Wadworth
The Local Plan housing requirement is not sufficient and not fully aligned with forecast economic growth. It identifies significantly more employment land than the target for provision established in Policy 3. There is a significant mismatch between employment land allocations and housing land allocations. The identified supply is insufficient to meet the Council's identified requirement. Regeneris Consulting have reviewed the housing requirement of 18,400 dwellings over the plan period / 920 dpa. They found that the PBA report made unjustified and unrealistic assumptions for a number of factors which suppress the level of housing required to support future employment growth. Specifically disagree about assumptions on commuting, double jobbing and household formation (report supplied). The report considers that Doncaster has one of the fastest growing economies in Yorkshire and the Humber and has created 24,000 jobs 2000 - 2017 (1.1% pa). Its key asset is connectivity by rail, air and road which is highly attractive to investors, especially industrial and logistics occupiers. Over 1.1m sq m of industrial / warehousing land has been taken up since 2010. There has been a significant improvement in key economic indicators, including skills and level of enterprise.

The business start up rate has more than doubled since 2010 and is in line with the national average, thus removing a key barrier to growth. There continues to be demand for industrial space in Doncaster and strong potential to accommodate high levels of inward investment in future, which would drive jobs growth. Given this, not enough homes are being planned for, and there needs to be a more appropriate balance between housing provision and economic ambitions. It is clear from the framework that the standard method is a starting point and a minimum, not a housing requirement figure itself. It is also clear that the affordability adjustment within the standard methodology is just to ensure that the minimum housing needs starts to address affordability of homes. It therefore does not fully address affordability issues. There may be exceptional circumstances for planning for more housing. The Council need to recognise that the development of new housing will bring economic benefits to the area. New housing can support economic growth both through direct job creation through construction and through increased population, which will create sustainable jobs and increased goods / services demand. This provides an important sustainable development opportunity. The HBF report that housebuilding is worth £38bn p/a (England and Wales) and supports 700,000 jobs. House building supports the economy in a wider sense through being drive for economic growth; delivering jobs and economic value; supporting labour market mobility; creating skills and employability; enhancing place competitiveness; creating quality of place and reusing brownfield land. The report concludes that a healthy, well-functioning labour market requires a good supply of housing that is affordable for local people to enable them to move jobs freely and match up skills supply with employer demand. A dysfunctional housing market can inhibit labour market mobility, in turn stifling economic growth. Regeneris consider the housing need should be 1,100dpa to support economic growth. 920 dpa risks constraining the future economic growth of Doncaster. Furthermore jobs are only forecast 2015 - 32, it is unclear what consideration has been given to expected job growth to the end of the plan period and therefore it is considered possible that the jobs led target underestimates the need over the full plan period. There is a discrepancy between para. 4.61 and Tables E1 - E8 and the numbers stated (481ha vs. 565.77ha), and there is also additional employment land available according to tables E1 - E8. There is a significant mismatch between the level of planned employment provision in Policy 4 and planned housing. The housing requirement needs to be uplifted to reflect the employment land provision. Net completions 2015 - 18 amount to 3,211 and have been consistently higher than the Local Plan target. This shows there is sufficient demand to support a requirement above 920dpa. PBA calculated 1,073 in an earlier approach and advised it is prudent to plan for between 562 and 1,073. 1% employment growth would support a target at the top of this range. There is therefore evidence of higher delivery of housing and a higher need. PPG is clear this evidence should be taken into account when determining the housing requirement. 912dpa is not based on jobs growth over the full plan period. Furthermore, there is evidence the affordable housing needs in the borough cannot be met based on a target of 920. Affordable housing delivery is below 23% even against higher rates of delivery than 920dpa. Concern that 920 will not deliver the affordable housing needed. To deliver 209 affordable dwellings per annum, 1,393 dpa would be needed, averaging an assumed 15% affordable housing (the highest achieved over the past 3 years). There is sufficient evidence for an uplift to the housing figure. The policy is not justified or consistent with the framework and the plan is currently unavailable. The requirement should be at least 1,100 to meet economic growth ambitions and balance housing / job aspirations and ensure the needs for affordable homes can be met (up to 1,393 dpa). Concern that the Council's approach to delivering the housing requirement does not reflect national guidance. There is insufficient flexibility in the supply of land to meet the identified needs in full. The framework is clear plans should be flexible to adapt to rapid change and emphasises the importance of ensuring that a sufficient amount and variety of land can come forward when needed. The plan period requirement is 18,400, with 3,400 completions and planning permission requirements equivalent to 16,055. This provides a flexibility of 5% (1,055 dwellings), which is insufficient given the potential for non delivery and under delivery of sites - particularly from dependency on a number of large sites. Some policies may undermine delivery (especially 8, 46, 66 and 67) or lead to the need for further site specific viability testing which impacts on the timing of delivery and therefore means greater flexibility is required. It is noted that supply attributed to completions appears to be gross not net. The plan indicates completions of 3,400 but according to the RLA reports, net completions are 3,211. This would leave the residual requirement based on 920 to at least 15,189 and reduce flexibility in the plan to 866 dwellings (4.7%). The trajectory shows the council would struggle to maintain a continuous supply over the plan period, especially later on. The RLA is also not up to date and needs updating. 100% deliverability of commitments should not be assumed, there should be at least a 10% discount according to best practice and guidance. This is supported with higher levels of discounting for larger sites to account for unforeseen circumstances and delivery delays. Out of 9,488 plots, there should be a discount of c. 948, however it could be higher given concerns about some deliverability. Deliverability with reliance on commitments especially as some are historic brownfield sites with viability concerns in challenging marker areas, some of which also constrained by flood risk. Evidence of developer interest in such sites should be a fundamental requirement to provide confidence on delivery. Concerning sites include: Site Ref: 838 Site Name: Hexthorpe No. of Dwellings: 930 Avant Homes Comment: There have been a number of planning applications and proposed schemes over the years, but there has been no delivery on site. Countryside PLC has submitted a planning application which the Environment Agency has objected to and recommended refusal. There is conflicting evidence in terms of deliverability. There are significant flooding constraints affecting the site. No further deliverability evidence has been produced in the Doncaster 5 Year Deliverable Housing Land Supply Statement. The Residential Land Availability Study notes that at 31/03/2018 there were no completions and the site is not currently being developed. Site Ref: 843 Site Name: Manor Farm, Bessacarr No. of Dwellings: 1,009 Avant Homes Comment: This is a Persimmon / Charles Church scheme. However, delivery has become frustrated by the need to deliver infrastructure to complete development. Since there is only one developer on the site the development trajectory is likely to be modest and development of the site is unlikely to be achieved during the plan period. The Residential Land Availability Report indicates 39 completed in 17/18 which is below the rates expected in the Local Plan and HELAA. Which assumes delivery rates of around 70 dwellings a year. This is not realistic based on current delivery. Site Ref: 418 Site Name: Unity/DN7 Initiative No. of Dwellings: 905 Avant Homes Comment: The site has outline planning permission for 3,100 homes and no reserved matters have been submitted. The site is in significant multiple ownershi.
175 completions in the first five years. Higher rates of delivery are expected in the following years (70 dwellings per annum). These rates are overly optimistic especially when compared to annual completions for individual sites recorded in the residential land availability report. Site Ref: 569 Site Name: Askern Saw Mills No. of Dwellings: 220 Avant Homes Comment: This is a long standing, unimplemented planning permission that has been available but has remained undeveloped. There is no developer interest and consequently the assumed delivery of 220 new homes is optimistic. Indicated in the Residential Land Availability Report that the outline permission has lapsed. Site Ref: 984 Site Name: Former McCormick Tractors No. of Dwellings: 690. Avant Homes Comment: This site has significant constraints, and there is an outline permission relating to the development of the site. The Local Plan assumes a delivery rate of 56 dwellings per in the first five years and 64 dwellings per annum in the following years. This is overly optimistic and not consistent with the planning status and constraints on site. Site Ref: 940 E1 and E2 Site Name: Land east of Poplars Farm No. of Dwellings: 280/920 Avant Homes Comment: Site 940 is allocated in the plan for development of up to 280 dwellings (Part E1), Part E2 is identified as a reserved housing site for up to 920 dwellings. This site does not form a true reserve site. The council have identified a release mechanism which restricts the release of housing to net additional jobs delivered at the airport. Sites which are unavailable or unknown should not be included, such as: Site Ref: 1028 Site Name: Tickhill No. of Dwellings: 74 Avant Homes Comment: This site does not have access, therefore cannot be considered to be deliverable. Further, the council's calculations highlight that the realistic. This is a 1.5 hectare site, a capacity of 44 dwellings would reflect the assumptions on net to gross developable area and density set out in the Viability Study. Site Ref: 662/247 Site Name: Colliery Site, Rossington No. of Dwellings: 897/237 Avant Homes Comment: The delivery rates on the site are overly optimistic. In 2017/18 there were only 49 completions on site 662. Assuming delivery rates based on past performance at this site then it is considered that only 600 dwellings will be capable of coming forward within the Plan period. This is significantly less than the 1127 homes forecast within the Plan. Site Ref: 081/343 Site Name: Thorne No. of Dwellings: 207 Avant Homes Comment: This is a longstanding allocation and there is little evidence available through the council's evidence base to demonstrate that there is developer interest or that the site will come forward in the short term. Site Ref: 795 Site Name: Thorne No. of Dwellings: 13 Avant Homes Comment: This site had permission which has since lapsed. There appears to be little developer interest in this site. The site is not considered to be deliverable. Site Ref: 510 Site Name: Thorne No. of Dwellings: 35. Avant Homes Comment: This is a narrow and constrained infill site, with railway forming the southern boundary of the site. There is little evidence available through the Council's evidence base to indicate any developer interest in the site. Site Ref: 165/186 Site Name: Carcroft No. of Dwellings: 300 Avant Homes Comment: This site is located to the western edge of the settlement and is relatively distant from the key services and facilities such as the train station, and employment opportunities. Other sites are located nearer to key services. A high level assessment shows some proposals are at risk and hence why a buffer is required. Furthermore, existing permissions are heavily relied on as an alternative to identifying a sufficient supply of new allocations. Consequently, a number of sustainable places have insufficient allocations to meet their needs throughout the plan period. There are also unrealistic assumptions on gross to net deliverable site areas and proposed yields especially given developer requirements. Further sites are therefore needed. The Council therefore need a wider choice of sites across a number of different areas and market areas to gain traction and increase build rates. To achieve the housing requirement the Council need at least 30-35 housing outlets operating across the Borough for every year of the Plan. Do not believe the plan can deliver this, especially in later years. The council should be realistic on delivery of sites, especially those which have not commenced preparations for securing relevant planning permissions. and developer interest on build rates. Sites without permission should not be providing completions until at least 2023/24. Those with permission must have clear evidence of deliverability. Flexibility must be built in and commitments reviewed check deliverability, house builders on board and what constraints exist. Delivery rates must also be reviewed to check sites are deliverable in light of policy obligations. The council should make provision for: Annual Housing Requirement Council Figures: 920 Avant Homes' View: 1,100 Total Requirement (2015-2035) - which is 15 years post adoption Council Figures: 18,400 Avant Homes' View: 22,000 Completions Council Figures: 3,400 Avant Homes' View: 3,211 Total Commitments Council Figures: 9,488 Avant Homes' View: 9,488 Non-Delivery Allowance (at least 10%) Council Figures: 948.8 Avant Homes' View: 948.8 Total Allocations Council Figures: 6,567 Avant Homes' View: 6,567 Total Supply Council Figures: 18,506 Avant Homes' View: 18,317.2 Residual homes to be identified Council Figures: -106.2 Avant Homes' View: 3,682.2 Best case, there must be c.3682 new homes to be identified in the Plan to account for net completions, and economic growth. This does not account for the uplift required to ensure affordable housing need is met in full, which as indicated in paragraph 5.28, would lead to a requirement of 1,393 dpa and a plan requirement of 27,860. Based on the current supply of 3,311 completions, 9,488 commitments, an allowance for 10% non-implementation, and the currently proposed allocations of 6,567 homes, this would lead to need for a further 9,542 additional homes. The above scenario does not balance housing and employment. The additional employment allocations amount to 83.77 hectares above the requirement, this is the equivalent of an additional 3.5 years supply of land. As a result in order to balance the housing provision with the additional employment supply circa 3,850 additional homes will be required, this amounts to an annual requirement of 1,292.5 dpa. Avant Homes consider circa 7,532 additional homes are required in order to balance the Housing with Employment supply, account for net completions and appropriate non-implementation rates. Employment requirement 2015-2035 Avant Homes' View: 481 hectares Annual employment requirement Avant Homes' View: 24 hectares Employment land developed 2015-2018 Avant Homes' View: 117 Sites with planning permission Tables E1 to E8 Avant Homes' View: 284.09 New employment allocations Policy 4 Avant Homes' View: 164.68 Total Allocations Avant Homes' View: 565.77 Amount of land allocated over the requirement Avant Homes' View: 83.77 Additional homes required to balance with employment land supply Avant Homes' View: 3,850 Residual homes to be identified Avant Homes' View: 7,532.2 Assuming no changes to the housing supply, which there are also concerns about, or airport economic growth. There should also be safeguarded land. Avant Homes consider that the appropriate areas and sites to accommodate growth would be: - Site 494: Green Lane, Scawthorpe, Doncaster - New Site: Melton Road, Newton, Doncaster - HELAA Site (871): Wadsworth Hill, Wadsworth - Increase housing requirement to 1,100 to 1,300 dwellings over the plan period. - Reduce the potential from 106.2 to 75.32.2. - Identify safeguarded land. - Allocate: - Site 494: Green Lane, Scawthorpe, Doncaster - New Site: Melton Road, Newton, Doncaster - HELAA Site (871): Wadsworth Hill, Wadsworth

Response:
The Peter Brett’s report assesses the employment and housing target for the borough and ties the two together to ensure the right amount of houses are provided for the projected growth. The Council are confident that this report provides a sound and realistic figure. Many ways have been submitted to the Council about how the housing and employment figures could be derived. The submission Local Plan included a range, but still plans for enough housing to meet the requirement of 920dpa over the plan period - the use of a range does not prejudice this. 920dpa is the assessed level of housing required under the revised NPPF, 1,073 refers to the figure using the previous NPPF, which is now redundant. It should also be noted the PBA report states a mid-way point between 585 and 920 could be used, which the Council elected not to do. The Local Plan is planning for 57% more housing than the Standard Methodology proposed, and in doing so the Council have taken on board national policy and guidance. The jobs requirement covers the period 2015 - 35, and enough housing is planned for to match this - there is no reason to uplift this further, including for affordable housing. There is additional flexibility in housing deliver, as the plan does not factor in to its calculations windfalls; sites of 1-4 units; any development in Defined Villages; the proposed 280 dwellings at the airport + possible 920 further linked to job delivery; and the potential of Reserve Development Sites to deliver housing. If all these are factored in, then there is a total potential supply of
24,880 + future windfalls and potential empty homes coming into use, which is 6,480 above the 20 year requirement of 18,400, or in effect a buffer of 35%. Trajectories and other matters raised or covered in the Housing Topic Paper. The RLA has been updated for 2019 now.

Consideration has been given to site constraints and delivery, and factored in where appropriate. With regards to site 494, it is not felt that exceptional circumstances exist to justify the release of this site, as set out in the Green Belt Topic Paper. 871 is in a Defined Village where no new allocations are being made.
Policy 3 identifies the need to deliver 18,400 new homes in the period 2015 to 2035 (920 per annum), with sufficient land allocated to deliver 15 years’ supply of housing (13,230, or 882 dpa once supply in the years 2015 to 2018 is deducted from the overall requirement). Policy 3 then goes on to states that the housing requirement is expressed as a range with the bottom of the range being the Local Housing Need figure and the top of the range being 920dpa. Policy 3 does not however state what the Local Housing Need figure, which is identified within the ‘Economic Forecasts and Housing Needs Assessment’ (June 2018) (prepared by PBA) as 585dpa. Therefore, the implication of this is that the housing requirement for Doncaster supports the delivery of between 585 and 920dpa over the plan period. Hallam Land Management consider that this is a significant change since the Draft Plan for informal consultation. Policy 3 has shifted from stating that the 920dpa is a minimum figure (‘at least’), to stating that the housing requirement is a range from the Local Housing Need (585dpa) to 920dpa. This policy is not sound as it does not support a positively prepared plan which is supportive of boosting significantly the supply of housing. We consider it important that the wording in Policy 3 should state that the 920dpa is a minimum and reflect the wording in the Draft Plan for informal consultation where the 920dpa was stated as ‘at least 920 dpa’. Policy 3 should make it clear that the number of homes per annum is a net figure, again this is a change since the Draft Plan for informal consultation which explicitly stated that the 920dpa were net homes required to be delivered over the plan period. Policy 3 should also set the housing requirement for Dunscoft, Dunsville, Hatfield and Stainforth as a net figure of a minimum of 1,085 dwellings across the plan period as opposed to the range currently set out. We also consider there is an error in the calculation of the remaining requirement as past delivery from 2015 to 2018 is a period of 4 years, which when taken away from the 20-year plan period, would result in 16 years to deliver the housing requirement over the remainder of the plan period. We suggest that the numerical value of the Local Housing Need for Doncaster (585 dpa) should be explicitly stated in Policy 3. The 920dpa identified in Policy 3 is not evidenced within the PBA report and it is unclear upon which evidence the 920dpa figure is based. The PBA report suggests that in order to support the job-led scenario which supports the economic ambition of Doncaster and the Sheffield City Region over the plan period, 1,073dpa would be required. This level of future housing need to support the jobs-led scenario over the plan period and is more aligned with housing delivery in recent years. The Doncaster Residential Land Availability Report 2018 shows average net completions over the last 3 years of 1,070. It is anticipated that this could rise when the net delivery figures for 2018/19 are published. Period: 2015/16 Net housing delivery: 1,025 Period: 2016/17 Net housing delivery: 1,049 Period: 2017/18 Net housing delivery: 1,137 Period: 2018/19 Net housing delivery: 1,327 * Source: Residential Land Availability 2017/18 *number to be confirmed but current Council estimate based on methodology used in RLA The PPG at paragraph ID :2a-010 is clear that the government remains committed to ensuring more homes are built and support authorities who want to plan for additional growth and as such the standard method is a minimum starting point in determining the number of homes needed in an area. The PPG goes on to identify the circumstances where it may be appropriate to consider whether actual housing need is higher than the standard method. These include where; - Growth strategies are in place such as Housing Deals; - Strategic infrastructure improvements are identified; and - Previous levels of housing delivery are significantly greater than the standard method. The PPG is clear that in these situations authorities will need to take this into account when identifying future needs. Doncaster’s Publication Local Plan does identify a housing requirement as a range, of which the upper end is above the standard method, trends in past delivery and the aspiration to support an economic led future for Doncaster suggest that in order to plan positively for the future it would be more appropriate for the housing requirement in Doncaster to be set at the 1,073 dpa to ensure that the vision can be achieved. Accordingly, Hallam Land Management considers that there is a need to increase the housing requirement identified in Policy 3 to at least 1,073 dpa, in line with the Council’s own evidence, if the vision for the plan is to be achieved. The minimum housing requirement for Dunscoft, Dunsville, Hatfield and Stainforth should also be increased to reflect this update.

Summary:

Policy 3 now proposes to set the housing requirement as a range which is a significant change to the last consultation where 920dpa was a minimum/at least figure. the policy is not sound and does not support a positively prepared plan seeking to boost housing supply. Policy 3 should state that 920dpa is a minimum and reflects the previous consultation policy. Should make clear this is a net figure and that the figure for Hatfield-Stainforth is 1,085 minimum and net as opposed to the current range. There is an error in the calculation of the remaining requirement as past delivery from 2015 to 2018 is a period of 4 years, which when taken away from the 20-year plan period, would result in 16 years to deliver the housing requirement over the remainder of the plan period. Suggest that the numerical value of the Local Housing Need for Doncaster (585 dpa) should be explicitly stated in Policy 3. The 920dpa identified in Policy 3 is not evidenced within the PBA report and it is unclear upon which evidence the 920dpa figure is based. The PBA report suggests that in order to support the job-led scenario which supports the economic ambition of Doncaster and the Sheffield City Region over the plan period, 1,073dpa would be required. This level of future housing need to support the jobs-led scenario over the plan period and is more aligned with housing delivery in recent years. The Doncaster Residential Land Availability Report 2018 shows average net completions over the last 3 years of 1,070. It is anticipated that this could rise when the net delivery figures for 2018/19 are published. PPG is clear that the methodology is a minimum starting point and identifies circumstances where appropriate to consider a higher requirement. There is a need to increase the housing requirement to state at least 1,073 dpa, in line with the Council’s own evidence, if the vision for the plan is to be achieved. The minimum housing requirement for Dunscoft, Dunsville, Hatfield and Stainforth should...
also be increased to reflect this update.

Response:
The Local Plan sets out a supply of housing that far exceeds the 18,400 new homes so it is clear that this is already an 'at least' figure and the explanatory text (as well as all the supporting evidence base in respect to how sites have been allocated etc) are clear that this is a net figure already. Completions for 2015-2018 are based on the annual monitoring reports and are April-March so 1st April 2015 to 31st March 2018 which is a 3-year period and leaves 17 years of the plan remaining (being 1st April 2018-31st March 2035). The Local Housing Need figure as derived via the Standard Methodology changes on an annual basis in line with new population projections and affordability ratios so the figure will date very quickly if included in the plan. The 1,073 requirement figure is taken from the PBA Report, but is based on the 2012 NPPF so the 920 figure (or 912 as per the PBA Report) is an appropriate requirement and is a significant uplift to the standard methodology. More details are set out in the PBA Report under the section Housing Numbers Under the New Planning System as well as the supporting Housing Strategy Background Paper which was published alongside the Publication stage. Current completion figures are a result of a number of sites that have been in the pipeline that are now on stream and delivering but caution should be taken when making assumptions that this can/will continue throughout the rest of the plan period. A high allocation will of course require more sites that will, by default, be either GB/FRZ/other environmentally sensitive sites.
The Local Plan identifies significantly more employment land than the target for provision established in Policy 3. - There is a significant mismatch between the level of employment land allocated and the level of housing land allocated in the Plan period; and - The identified supply is not sufficient to meet the Councils identified requirement. Need 5.4. Priority Space is concerned with the proposed level of new housing being planned for in the Local Plan. Policy 3 makes provision for 18,400 dwellings to be delivered between 2015 and 2035, equivalent to 920 net new homes each year. Policy 3 states that there should be sufficient allocations for 15 years supply, which is 13,230 new homes. 5.5. Priority Space has commissioned Regeneris Consulting to review the OAN and the Economic Forecasts and Housing Needs Assessment (2018). The Regeneris report is attached to these representations. Regeneris conclude that: - The target delivers the minimum level of housing need for Doncaster based on the standard method (585 dpa) and makes an upward adjustment to support economic growth. - The upward adjustment was based on evidence produced by PBA which recommended housing need is presented as a range between 585 dpa (the minimum) and 912 dpa. The upper limit was based on matching Jobs growth aspirations of the Sheffield City Region LEP (1,420) over the period 2016 to 2026. - However, PBA have made unjustified and unrealistic assumptions for a number of factors which all suppress the level of housing required to support future employment growth. In particular, we disagree with their assumptions about commuting, double jobbing and household formation rates. (SEE EMAIL FOR Regeneris Report) 5.6. Regeneris consider that: - Doncaster has been one of the fastest growing economies in Yorkshire and Humber. The district has created around 24,000 jobs between 2000 and 2017, representing a growth rate of 1.1% p.a - Doncaster’s key asset is its connectivity by road, rail and air which has made it a highly attractive location for inward investment, particularly for industrial and logistics occupiers, with over 1.1m sq m of industrial/warehouse space taken up since 2010. - The strong performance is also due to a significant improvement in key economic indicators, including skills and levels of enterprise. The business start-up rate has more than doubled since 2010 and is now in line with the national average. These improvements have removed a key barrier to growth and mean that Doncaster is well placed to continue its high rate of growth. - The Local Plan has set a target of delivering 481 hectares of employment land between 2015 and 2035 and a number of ERL’s shows there continues to be very strong market demand for industrial space in Doncaster. There is therefore strong potential for Doncaster to accommodate high levels of inward investment in future which would also drive jobs growth. 5.7. Priority Space does have concerns that the proposed housing requirement does not represent an appropriate figure once consideration is given to the potential for economic growth and job formation. Priority Space continue to consider that an appropriate balance should be sought between employment growth aspirations and the provision of homes. 5.8. The Framework (2019) reaffirms the Governments’ commitment to ‘significantly boosting the supply of homes’ and states that ‘it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed’. It goes on to state ‘to determine the minimum number of homes need, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify and alternative approach which also reflects current and future demographic trends and market signals’. 5.9. NPPG is clear that the standard method identifies a minimum annual housing need figure and that it does not produce a housing requirement figure Paragraph 002 Reference ID: 2a-002-20190220. It is also clear that the affordability adjustment within the standard methodology is just to ensure that the minimum housing needs starts to address affordability of homes. It therefore does not fully address affordability issues. Paragraph 006 Reference ID: 2a-006-201902020. 5.10. NPPG goes on to identify the circumstances when it is appropriate to plan for a higher housing need figure than the standard methodology identifies. ‘The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides the minimum starting point in determining the number of homes needed in an area. It does not predict the impact of future government policies, changing economic circumstances or other factors that might have an impact on demographic behaviour. Therefore there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicate. 5.11. This need to be assessed prior to and separate from, considering how much of the overall need can be accommodated. Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: 5.12. Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth 5.13. Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; 5.14. An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground. 5.15. There may, occasionally be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced SHMA) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need that the standard model suggests’. Paragraph 010 Reference ID: 2a-010-20190220. 5.16. The Council need to recognise that the development of new housing will bring forward additional economic benefits to the area. The relationship between economic performance in an area and housing is complex, but having the right quantity, quality and balance
of housing in an area is necessary for economic growth. The development of new housing can therefore support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population which will create sustainable local jobs from the increased demand for goods and services. This provides an important sustainable development opportunity for Doncaster. 5.17. Importantly the HBF released in July 2018 its report on "the economic footprint of house building in England and Wales", which shows that house building in England and Wales is now worth #38bn a year and supports nearly 700,000 jobs. House building activity contributes economically in different ways including providing jobs, tax revenues and contributing funding for local infrastructure and communities. House building supports the economic in a wider sense through being drive for economic growth; delivering jobs and economic value; supporting labour market mobility; creating skills and employability; enhancing place competitiveness; creating quality of place and reusing brownfield land. 5.18. An important conclusion of the report and the wider economic benefits is that a healthy, well-functioning labour market requires a good supply of housing that is affordable for local people to enable them to move jobs freely and match up skills supply with employer demand. A dysfunctional housing market can inhibit labour market mobility, in turn stifling economic growth. 5.19. Regeneris consider that Doncaster’s housing need over the plan period should be 1,100 dpa to support future economic growth. Regeneris consider that the target of 920 dpa would risk constraining the future economic growth of Doncaster. 5.20. Further, it is evident that the council are seeking to align economic growth with housing growth and have identified provision above the local housing need figure to which the council considers accounts for Job Led growth. However, the jobs led growth figure is based on jobs growth forecast between 2015-2032. It is not clear whether consideration has been given to the additional job growth expected to the end of the plan period. Therefore Priority Space consider there is potential for the jobs led scenario to underestimate the jobs growth over the full plan period. The associated uplift to the housing requirement will therefore not be sufficient to meet the full needs over the plan period. 5.21. Additionally, the Council have identified a requirement for 481 hectares of employment land based on the Job Led scenario, and accounting for the extended plan period between 2032 and 2035. The explanatory text considers that this requirement is met through 117 hectares of land developed between 2015-2018, 201 hectares of land benefiting from planning permission, and 164 hectares of allocated sites. However, there is a discrepancy between the totals in paragraph 4.61 of the Plan and the figures arising from Tables E1 to E8. The sites that benefit from planning permission in tables E1 to E8 equate to 284.09 ha of employment land available within the plan period. This leads to a total provision of 565.77 hectares of employment land against a requirement of 481 hectares. It should be noted that within the permissions identified in tables E1 to E8 that additional employment land is available, adding to the potential supply. There is therefore a significant mismatch between the level of planned employment provision in Policy 4 and the planned housing provision. Therefore, the housing requirement needs to be uplifted to reflect the identified level of employment land provision. 5.22. As stated above NPPG indicates that consideration can be given to delivery rates, for the last three years completions have been consistently higher than the proposed local plan target. Net completions amount to 3211 dwellings, with annual completions as follows: Year: 2015-16 Net Completions: 1,025 Year: 2016/17 Net Completions: 1,049 Year: 2017/18 Net Completions: 1,137 Year: Total Net Completions: 3,211 5.23. This demonstrates that there is sufficient demand to support a requirement above 920 dwellings per annum. 5.24. The Councils Economic Forecasts and Housing Needs Assessment (PBA, 2018) considers the housing requirement prior against both the standard methodology, standard methodology with an uplift for economic growth and previous approach for identifying housing need. Following the earlier approach, PBA consider that an aspirational job led figure, based on the SEP ambitions, would equate to a requirement of 1,073. PBA considered that it would be prudent to plan for between 562 and 1073. To ensure that the requirement was realistic. It is worthy of note that the Employment Land Needs Assessment (2019). Considers that the Job led scenario was ambitious but realistic and notes the significant growth in Doncaster within the previous 15 years in line with SCR growth aspirations. And further the evidence of land take up and jobs growth for the period 2015-2018 was on target to meet 1% jobs growth per annum. This would support a target at the higher end of the range. 5.25. There is evidence of both delivery at a higher rate and recently published evidence that indicates a higher need for housing. As stated above NPPG is clear that this evidence should be taken into account when determining the housing requirement. 5.26. When using the standard method the housing need figure was 585, applying a job led figure to match the SEP led to a requirement of 912 (PBA, 2018). However this is not based on the Jobs growth over the full plan period. 5.27. Priority Space consider further evidence is required to demonstrate whether the affordable housing needs of Doncaster can be met based on a target of 920. The explanatory text states that the current need for affordable housing, 209 affordable units, represents 3% of the Local Plan requirement for housing. Paragraph 5.9 states that this does not take into account current completions or viability. The completions affordable completions for the last three years (first three years of the Local Plan) are as follows: Year: 15/16 Affordable Completions: 151 Total Completions: 1,088 Affordable completions (%):13.88 Year: 16/17 Affordable Completions: 161 Total Completions: 1,067 Affordable completions (%):15.09 Year: 17/18 Affordable Completions: 166 Total Completions: 1,208 Affordable completions (%):15.09 5.28. The total affordable completions falling below the identified affordable need, even when total completions are higher than the proposed Local Plan requirement of 920. Further, Policy 8 identifies a requirement for 23% affordable housing in high/medium (13.74) value areas and 15% in low value areas. An as indicated in response to Policy 8 and Policy 67, this is demonstrated to be unviable for a number of sites, including all types of sites in low value areas. Priority Space are therefore concerned that a target of 920 dwellings will not deliver sufficient number and range of affordable homes to meet the identified need for affordable homes in the Borough. In order to deliver 209 affordable dwellings per year, a requirement of at least 1,393 would be required. This assuming the achievement of an average of 15% affordable housing, which represents the highest achieved over the last three years of monitoring. 5.29. Priority Space consider that there is sufficient evidence to pointing to the need for further uplift in the Local Plan housing requirement, based on the significant mismatch between housing and employment land allocations, the need to support the local plans economic ambitions, evidence of delivery and the need to ensure sufficient delivery of affordable housing. 5.30. Priority Space consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form to support sustainable development in accordance with policies in the Framework and its supporting policies. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 5.31. However, Priority Space consider that with a higher requirement, of at least 1,100 to meet the economic growth aspirations, and further uplifts to balance housing allocations with the employment land allocations, and to ensure that the needs for affordable homes can be met (up to 1393) that the Local Plan can be found sound. Priority Space will continue to work with the Council to develop appropriate modifications to the Local Plan Housing Supply and Delivery 5.32. Priority Space is concerned that the Council's approach to delivering the housing requirement does not appear to reflect national guidance. 5.33. The Council is not demonstrating sufficient flexibility in the supply of housing land to ensure that the Plan can meet identified needs in full. The Framework is clear that plans should be sufficiently flexible to adapt to rapid change, and emphasises the importance of ensuring that a sufficient amount and variety of land can come forward where it is needed. 5.34. PPG is clear that careful attention should be given to providing an adequate supply of land, and the Plan needs to be realistic about what can be achieved and when. Authorities need to ensure that policies setting out contributions expected from development do not undermine the deliverability of the Plan. (Paragraph 59 Reference ID: 61-059-20190315. 5.35. At present based on the Councils figures presented in the Local Plan, a Plan requirement of 18400, completions equating to 3400 and allocations equating to 16,055, there is a flexibility of around 1055 dwellings which equates to 5% of the Local Plan Requirement. Priority Space consider that this is insufficient given the potential for non-delivery and under delivery of sites, particularly from the dependency on a number of large sites. As set out in our response to a number of policies within the plan and specifically Policies 8, 46, 66 and 67, Priority Space are concerned that some of
the policies may undermine the deliverability of sites, or lead to the need for further site specific viability testing impacting on the timing of delivery and therefore there is a need for greater flexibility in the housing supply. Specific sites are identified later in this section. 5.36. Priority Space have a number of concerns relating to the supply in the Plan in terms of completions, the allocations from permissions and the new allocations. 5.37. It is noted that the supply attributed to completions appears to be resultant from gross completions rather than net completions. The Plan indicates that completions between 2015 and 2018 equate to 3400, However data in the Residential Land Availability Report indicates that net completions amount to 1750. It is important therefore to rigorously assess housing land supply and planning assumptions. 5.38. With regard to overall supply from permissions and allocations, a housing trajectory has been provided. Priority Space are concerned that this demonstrates that the Council will struggle to maintain a continuous supply of housing particularly in the later phases of the Plan period. Only four sites are identified as being capable of delivery in the final years of the plan period and two sites delivering beyond the plan period. 5.39. Furthermore, the Councils’ HELAA and Residential Land Availability Report have a base date of March 2018, thus a whole monitoring year is presently absent. This evidence base should therefore be updated. 5.40. In terms of existing commitments it appears that the Council assumes 100% delivery and no discount has been applied. Best Practice and Guidance suggests that at least a 10% discount should be applied on sites with extant planning permission but this could vary depending on site specific constraints and complexity. Priority Space supports the discounting of sites with planning permission but consider it may be beneficial to include a higher level of discount for large sites to take into account unforeseen circumstances and delivery delays. Priority Space consider therefore that from a commitments pot of 9,488 dwellings a discount of at least circa 948 should be applied, however this could feasibly be higher given the history and constraints of a number of sites. 5.41. Priority Space is concerned with the reliance on some existing housing sites with planning permission and their potential delivery, particularly as some are fairly historic brownfield sites with viability concerns in market challenging areas. There are a considerable number of outstanding planning permissions in poor market areas, some of which are also constrained by flood risk. Evidence of developer interest in such sites should be a fundamental requirement to provide confidence on delivery. For example, a brief review of some sites being shown as commitments shows considerable concern: Site Ref: 838 Site Name: Hexthorpe No. of Dwellings: 930 Priority Space Comment: There have been a number of planning applications and proposed schemes over the years, but there has been no delivery on site. Countryside PLC has submitted a planning application which the Environment Agency has objected to and recommended refusal. There is conflicting evidence in terms of delivery rates, with the Local Plan and the HELAA. There are significant flooding constraints affecting the site. No further deliverability evidence has been produced in the Doncaster 5 Year Deliverable Housing Land Supply Statement. The Residential Land Availability Study notes that at 31/03/2018 there were no completions and the site is not currently being developed. Site Ref: 843 Site Name: Manor Farm, Bessacarr No. of Dwellings: 1,009 Priority Space Comment: This is a Persimmon / Charles Church scheme. However, delivery has become frustrated by the need to deliver infrastructure to complete development. Since there is only one developer on the site the development trajectory is likely to be modest and development of the site is unlikely to be achieved during the plan period. The Residential Land Availability Report indicates 39 completed in 17/18 which is below the rates expected in the Local Plan and the HELAA. Which assumes delivery rates of around 70 dwellings a year. This is not realistic based on current delivery. Site Ref: 418 Site Name: Unity/ON7 Initiative No. of Dwellings: 905 Priority Space Comment: The site has outline planning permission for 3,100 homes and no reserved matters have been submitted. The site is in significant multiple ownership and understand that CPO procedures will be employed to facilitate the delivery of requisite infrastructure. Homes England is also assigning public funding to support the development. Given the presence of multiple landowners, the need for considerable public funding, the likelihood of a protracted timeframe to open up the site for development and the absence of confirmed market interest, the site is unlikely to deliver the Council’s prediction of 1015 homes in the plan period. The HELAA does not anticipate a start on site until years 6 to 10. However the local plan indicates a 175 completions in the first five years. Higher rates of delivery are expected in the following years (70 dwellings per annum). These rates are overly optimistic especially when compared to annual completions for individual sites recorded in the residential land availability report. Site Ref: 569 Site Name: Askern Saw Mills No. of Dwellings: 220 Priority Space Comment: This is a long standing, unimplemented planning permission that has been available but has remained undeveloped. There is no developer interest and consequently the assumed delivery of 220 new homes is optimistic. Indicated in the Residential Land Availability Report that the outline permission has lapsed. Site Ref: 984 Site Name: Former McCormick Tractors No. of Dwellings: 600 Priority Space Comment: This site has significant constraints. There is an outline permission relating to the development of the site. The Local Plan assumes a delivery rate of 56 dwellings per in the first five years and 64 dwellings per annum in the following years. This is overly optimistic and not consistent with the planning status and constraints on site. Site Ref: 940 E1 and E2 Site Name: Land east of Poplars Farm No. of Dwellings: 280/920 Priority Space Comment: Site 940 is allocated in the plan for development of up to 280 dwellings (Part E1), Part E2 is identified as a reserved housing site for up to 920 dwellings. This site does not form a true reserve site. The council have identified a release mechanism which restricts the release of housing to net additional jobs delivered at the airport. 5.42. Priority Space understands that no allowance has been made for demolitions. No evidence is apparent and Priority Space consider it would be appropriate for this evidence to be forthcoming. 5.43. The availability of land is crucial. To be considered deliverable the land needs to be available now and in terms of developable there needs to be a reasonable prospect that land will be available at the point envisaged. Priority Space consider that sites which are not available or are unknown should not be included in the Plan or a buffer should be provided due to the uncertainty on delivery. Site Ref: 1028 Site Name: Tickhill No. of Dwellings: 74 Priority Space Comment: This site does not have access, therefore it cannot be considered to be deliverable. Further, the capacity of the site is unrealistic. This is a 1.5 hectare site, a capacity of 44 dwellings would reflect the assumptions on net to gross developable area and density set out in the Viability Study. Site Ref: 662/247 Site Name: Colliery Site, Rossington No. of Dwellings: 897/237 Priority Space Comment: The delivery rates on the site are overly optimistic. In 2017/18 there were only 49 completions on site 662. Assuming delivery rates based on past performance at this site then it is considered that only approx 325 dwellings are to be delivered within the Plan period. This is significantly less than the 1272 home forecast within the Plan. Site Ref: 081/343 Site Name: Thorne No. of Dwellings: 207 Priority Space Comment: This is a longstanding allocation and there is little evidence available through the councils evidence base to demonstrate that there is developer interest or that the site will come forward in the short term. Site Ref: 795 Site Name: Thorne No. of Dwellings: 13 Priority Space Comment: This site had permission which has since lapsed. There appears to be little developer interest in this site. The site is not considered to be deliverable. Site Ref: 510 Site Name: Thorne No. of Dwellings: 25 Priority Space Comment: This is a narrow and constrained infill site, with railway forming the southern boundary of the site. There is little evidence available through the Councils evidence base to indicate any developer interest in the site. Site Ref: 165/186 Site Name: Carcroft No. of Dwellings: 300 Priority Space Comment: This site is located to the western edge of the settlement and is relatively distant from the key services and facilities such as the train station, and employment opportunities. Other sites are located nearer to key services. 5.44. A high level assessment of some of the proposed allocations shows that some proposals are at risk and hence one of the reasons why Best Practice suggests a buffer to the housing requirement should be included in the Plan. Furthermore, would appear to have leant heavily on allocating sites that already have planning permission as an alternative to identifying a sufficient supply of new allocation sites to meet its requirement for the plan period. Consequently, a number of settlements with strong sustainability credentials would appear to have insufficient allocations to meet their needs through the life of the plan. 5.45. It would appear in some instances that there are unrealistic assumptions on gross to net developable site areas and on the resultant yields from proposed allocations, especially when considering some of the development.
requirements. Priority Space therefore suggest that further sites should be identified. 5.46. The Council therefore need a wider choice of sites across a number of different areas and market areas to gain traction and increase build rates. To achieve the housing requirement the Council need at least 30-35 housing outlets operating across the Borough for every year of the Plan and Priority Space do not believe the Plan can deliver this, particularly in the middle to later years. 5.47. Priority Space considers the Council should be more realistic on the potential delivery on sites, particularly on sites which have not commenced preparations of securing the relevant planning permission and developer interest and on build rates. Priority Space consider that the sites with no planning permission should not be providing completions until 2023/24 (which is two years post adoption) as there is significant work and preparations to commence on site, including time to prepare and submit the planning application, gain planning permission, discharge conditions, legal agreements, site preparations, and commence house building. This process can take around 2 years. 5.48. Priority Space would be happy to work through the specific sites in detail with the Council to seek to reach agreement on the HELAA and current housing commitments. Interestingly, in line with the general direction of travel for this Local Plan the new Framework (2019) defines the term Deliverable in the glossary stating that sites can only be considered deliverable where they have detailed planning permission. If they have outline planning permission or are allocated in a plan a site can only be considered if there is clear evidence that housing completions will begin on site within five years. The level of evidence that must be provided to demonstrate that sites are deliverable has therefore been tightened. 5.49. Priority Space considers that the main risks to the delivery of the housing requirement are slippages in the delivery of allocations, longer lead-in times, reduced housing capacity on sites, sites no longer coming forward as result of viability from policy obligations set out in the Local Plan. Given these risks Priority Space would suggest a greater flexibility is incorporated into the Local Plan especially in light of Priority Space' conclusions on the actual housing requirement. 5.50. Priority Space would encourage the Council to review the existing commitments to ensure this is still deliverable, whether there is a housebuilder on board and whether there are any constraints preventing development from coming forward. Priority Space would also ask the Council to look at the proposed delivery of site allocations to determine whether the delivery rates are appropriate and the sites are deliverable in light of the policy obligations proposed in the Local Plan. 5.51. Taking into account the above, the Council should be making provision for: Annual Housing Requirement Council Figures: 920 Priority Space's View: 1,100 Total Requirement (2015-2035) - which is 15 years post adoption Council Figures: 18,400 Priority Space's View: 22,000 Completions Council Figures: 3,400 Priority Space's View: 3,211 Total Commitments Council Figures: 9,488 Priority Space's View: 9,488 Non-Delivery Allowance (at least 10%) Council Figures: 948.8 Priority Space's View: 948.8 Total Allocations Council Figures: 6,567 Priority Space's View: 6,567 Total Supply Council Figures: 18,506 Priority Space's View: 18,317.2 Residual homes to be identified Council Figures: -106.2 Priority Space's View: 3,682.2 5.52. Therefore, on a best case scenario Priority Space consider as a minimum there needs to be circa 3,682 new homes to be identified in the Plan to account for net completions, and economic growth. 5.53. This does not account for the uplift required to ensure affordable housing need is met in full, which as indicated in paragraph 5.28, would lead to a requirement of 1,393 dpa and a plan requirement of 27,860. Based on the current supply of 3,211 completions, 9,488 commitments, an allowance for 10% non-implementation, and the currently proposed allocations of 6,567 homes, this would lead to need for a further 9,542 additional homes. 5.54. Significantly, the scenarios above do not balance housing provision with the additional employment allocations. The additional employment allocations amount to 83.77 hectares above the requirement, this is equivalent of an additional 3.5 years supply of land. As a result in order to balance the housing provision with the additional employment supply circa 3,850 additional homes would be required, this amounts to an annual requirement of 1,292.5 dpa. Priority Space consider circa 7,532 additional homes are required in order to balance the Housing with Employment supply, account for net completions and appropriate non-implementation rates. Priority Space's View: Employment requirement 2015-2035 Priority Space's View: 481 hectares Annual employment requirement Priority Space's View: 24 hectares Employment land developed 2015-2018 Priority Space's View: 117 Sites with planning permission Tables E1 to E8 Priority Space's View: 284.09 New employment allocations Policy 4 Priority Space's View: 164.68 Total Allocations Priority Space’s View: 565.77 Amount of land allocated over the requirement Priority Space's View: 83.77 Additional homes required to balance with employment land supply Priority Space's View: 3,850 Residual homes to be identified Priority Space's View: 7,532.2 5.55. These figures assume no changes to the currently identified housing sites, which, in response to policy 3 and policy 6, Priority Space have raised significant concerns, particularly with regards the deliverability, capacity, and delivery rates of some sites and the overreliance on existing permissions or longstanding allocations. This does not account for additional economic growth associated with the airport. 5.56. Furthermore, there does not appear to be any safeguarded sites or genuinely deliverable reserve sites identified within the Draft Plan. This is concerning given Policy 6 states that the Plan will designated Reserve Development Sites. However, it states that the reserves sites identified are not considered developable in the plan period. Paragraph 4.43 of the Plan indicates that the reserve sites have flood risk mitigation issues or safeguarding issues associated with HS2 preventing them from coming forward. Priority Space would suggest, in order to insist with flexibility, that safeguarded sites be proposed in accordance with national guidance. The only other reserve site is related to direct job growth at the Airport and is strictly controlled, thus does not provide flexibility for the Plan as a whole. 5.57. The above scenarios do not include a detailed analysis of existing commitments and proposed allocations, however from a high level analysis it is evident that the Council's trajectory and analysis of sites is optimistic. 5.58. Therefore, with an increased housing requirement, reduced potential from existing planning permissions sites and incorporation of a flexibility allowance, further land will need to be identified. 5.59. Priority Space consider that the appropriate areas and sites to accommodate growth would be: - Site 273: Askern Road, Carcroft 5.60. A brief summary is provided for this site in response to Policy 6. Technical information and an advocacy report has been submitted previously. An updated flood risk assessment will be submitted shortly. This report will be supported by significant technical information and the report will demonstrate that the sites are viable, suitable and achievable and therefore deliverable in accordance with the Framework and PPG. (SEE EMAIL FOR Flood Risk Assessment) 5.61. Priority Space consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 5.62. However, Priority Space consider that with an appropriate uplift to the housing requirement, consideration of net completions, non-implementation rates and the allocation of additional land and safeguarded sites that the Local Plan can be found sound. Priority Space will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 5.63. To overcome the objection and address soundness matters, the Council should: - Increase housing requirement to 1,100 to 1,300 dwellings over the plan period. - Reduce the potential from current commitments and include a non-delivery allowance. - Identify safeguarded land. - Allocate Site 273: Askern Road, Carcroft
Summary:

1. Housing requirement not sufficient and not aligned with forecast economic growth. 2. Plan identifies more employment land than target. 3. Mismatch between employment land allocated and level of housing allocated. 4. Housing requirement - have commissioned own report by 'Regeneris Consulting' for OAN and economic forecasts (enclosed as Appendix). 5. Housing requirement should be 1,100 dpa (Regeneris). 6. Peter Brett forecast is for 2015-2032 - not clear if provision is made for 2032 to 2035. 7. There is a discrepancy in employment land allocated. Provision is 565.77 Ha against 481 requirement (para 5.21). 8. Employment allocation is 83.77 above requirement therefore need more housing. 9. Estimate circa 7,532 additional homes are required to balance emp/hsg requirement. 10. Recent high housing delivery rates and evidence from Employment land Needs Assessment (2019 update) suggest a higher housing need requirement (based on the success of the 2015-18 period). 11. Concerned that affordable housing rates are not viable. 920 will not deliver sufficient affordable housing. 12. Requirement would need to be 1,393 dpa to meet 15% requirement (based on last 3 years of monitoring). 13. Provision is 565.77 Ha against 481 requirement (para 5.21). 14. Housing requirement should be at least 1,100. 15. Current completions (2015-18) are gross and not net. 16. Plan will struggle with supply late in the plan period. 17. Evidence base needs updating - no HELAA or RLA for 2019. 18. Existing commitments - assumes 100% delivery - a discount should be applied for some none delivery. 19. Concerned about viability/deliverability of several sites with PP. (list the sites) 20. Concerned about viability/deliverability of several sites with PP. (list the sites) 21. Need to be more realistic on delivery rates. 22. Should review existing commitments to ensure deliverability. 23. Propose site 244 & 331 Coulman Road for allocation. Proposed Changes: 1. Increase housing requirement to 1,100 - 1,300 dpa. 2. Reduce the potential from current commitments. 3. Include a none delivery allowance. 4. Identify safeguarded land. 5. Allocate sites 244 & 331.

Response:

The Peter Brett’s report assesses the employment and housing target for the borough and ties the two together to ensure the right amount of houses are provided for the projected growth. The Council are confident that this report provides a sound and realistic figure. Many ways have been submitted to the Council about how the housing and employment figures could be derived. The submission Local Plan included a range, but still plans for enough housing to meet the requirement of 920dpa over the plan period - the use of a range does not prejudice this. 920dpa is the assessed level of housing required under the revised NPPF, 1,073 refers to the figure using the previous NPPF, which is now redundant. It should also be noted the PBA report states a mid-way point between 585 and 920 could be used, which the Council elected not to do. The Local Plan is planning for 57% more housing than the Standard Methodology proposed, and in doing so the Council have taken on board national policy and guidance. The jobs requirement covers the period 2015 - 35, and enough housing is planned for to match this - there is no reason to uplift this further, including for affordable housing. There is additional flexibility in housing delivery, as the plan does not factor in to its calculations windfalls; sites of 1-4 units; any development in Defined Villages; the proposed 280 dwellings at the airport + possible 920 further linked to job delivery; and the potential of Reserve Development Sites to deliver housing. If all these are factored in, then there is a total potential supply of 24,880 + future windfalls and potential empty homes coming into use, which is 6,480 above the 20 year requirement of 18,400, or in effect a buffer of 35%. Trajectories and other matters raised or covered in the Housing Topic Paper. The RLA has been updated for 2019 now. Consideration has been given to site constraints and delivery, and factored in where appropriate - this is discussed in the Site Selection Methodology and Housing Topic Paper. With regards to sites 244 and 331, both sites are in Flood Zone 3, where no new allocations are being made.
3.10 The proposed housing distribution within the draft plan has a strong focus on the Main Urban Area with 50% of development proposed in the Doncaster Main Urban Area, followed by 40% in second tier (Main Towns) locations, 10% in Services Towns and Larger Villages and limited development in Defined Villages. The proposed distribution is based on the Settlement Background Paper which forms a settlement hierarchy and informs the location of housing and employment sites. 3.11 The Publication Doncaster Local Plan identifies Auckley-Hayfield Green as one of 10 Service Towns/Villages which will provide about 10% of the Borough’s total housing requirement during the plan period. Specifically, Auckley-Hayfield Green is identified to deliver 125 dwellings. 3.12 Based on existing permission (115 units) and new allocations (140 units), the settlement is identified to deliver 255 new units in the plan period, above its proposed requirement by 130 units, or double the settlement’s housing target. This oversupply is intended to form supply at the end of the plan period. 3.13 The Sustainability Appraisal for the Publication Local Plan forms discounts Site 446 and all other alternatives within Auckley/Hayfield Green from allocation based on the proposed housing distribution and the level of housing already committed within the settlement. We object to this approach and consider it to be unsound. 3.14 It is not considered appropriate that such limited levels of allocations have been identified in reasonably sized settlements such as Auckley. The only justification put forward for failing to allocate new sites for development is based on existing permissions within these settlements. However, these sites have yet to be delivered and may suffer from issues including viability that could impact future delivery. 3.15 Settlements including Auckley/Hayfield Green have been identified as ‘Larger Villages’ within the settlement hierarchy. There is a population of over 6,800 people in the immediate area surrounding the airport (Finningley, Blaxton and Hayfield Green) and as such it is larger than the Tickhill (over 5,200 people) and Askern (over 5,500 people) and is of a similar size to Edlington (7,500). As at 2011, the immediate Auckley Area had a total of 3,100 people between the ages of 15 and 75 of which some 2,000 were economically active. However the draft plan proposes to retain existing settlement boundaries in Auckley and Finningley, allowing only infill small scale affordable housing. 3.16 The proposed approach to the delivery of housing, as drafted, fundamentally fails to recognise the emphasis within the Framework on the deliverability of housing and the need to support the prosperity of settlements outside of the main urban area. 3.17 The draft plan proposes a housing target based on economic growth objectives, a substantial element of which will be linked to the growth of the airport. The approach to limiting the expansion of those settlements surrounding the airport, together with the objectives of draft Policy 7, which seeks to support ‘windfall’ housing development linked to employment growth within the airport sites, risks creating an isolated community and fails to take the opportunity to ensure the future sustainability of existing communities located in close proximity to the airport. 3.18 While settlements such as Auckley may rely on towns to provide essential services, the need to maintain the existing services will require additional employment and housing. The continuing trend for a reduction in household size means downsizing will undercut the customer / user thresholds to which current amenities and facilities have become accustomed. This poses a significant threat to the current level of sustainability enjoyed by the settlement. 3.19 The housing allocations requirements should not be based purely on the hierarchy of a settlement as there are a number of considerations namely urban capacity, need and demand for housing, regeneration, environmental and social considerations, prioritising brownfield land which need to be taken into account to ensure the growth of settlements in a sustainable manner. Recommendation 3.20 The distribution of housing provision within Policy 3 - Service Towns and Larger Villages should be increased to meet the updated housing requirement, and reapportioned (or alternatively flexibility introduced) to support the delivery of a higher proportion of the housing within sustainable and desirable locations close to economic growth. Justification 3.21 The Local Plan as drafted was overly reliant on a significant quantum of sites within the Main Urban Area. This approach relies on the delivery of a notable number of large sites, which will require substantial enabling infrastructure in order to deal with constraints that may include contamination and highways infrastructure upgrades as well as drainage and other matters. 3.22 The growth potential of a number of Service Towns and Larger Villages has been underplayed and that Auckley/Hayfield Green, together with neighbouring Finningley should have an increased allocation of housing land within these settlements, in order to capture the regeneration opportunities provided by the proximity to the airport and to deliver housing in sustainable locations where there is recognised demand. 3.23 Given the size of the committed level of airport related employment on the airport itself it is also considered that the current approach fails to consider the obvious beneficial impact of concentrating further employment and residential development in close proximity to the airport, especially as there are large areas of despoiled land that are well related to public transport infrastructure and can be developed for mixed use schemes. 3.24 The limited housing target apportioned to Auckley/Hayfield Green, as well as neighbouring Finningley does not appear to be appropriate and there seems to be no justification of not meeting some level of demand and need in these locations. This approach is likely to result in not only a missed opportunity to support the projected economic growth but also lead to the decline of those settlements. 3.25 The potential for sustainable land in these areas should be realised where deliverable in order to support the long term viability of these areas. A proportionate increase in housing provision for the settlement at Auckley is consistent with the Plan’s strategic priorities, including ensuring future support for economic growth, and would assist in ensuring the Local Plan meets needs for a full 15 year period following adoption. By reviewing existing Countryside designations around these settlements, boundaries can be rationalised to allocate land for development to serve the purposes of these policy areas. 3.26 New housing allocations and mixed use schemes are considered to be an appropriate response to accommodating further development in these locations.
Summary:
Distribution of growth. 1. Objects to limited level of growth in a reasonably sized settlement such as Auckley. 2. Fails to meet the needs of settlements outside the main urban area. 3. Settlements close to the Airport (an economic growth priority) should have more houses. 4. Underestimates the potential growth of the Airport. 5. Policy should have flexibility to have a higher proportion of housing in locations close to economic growth area.

Response:
As demonstrated in the Housing Topic Paper, the Local Plan is proposing an appropriate housing requirement that will meet the needs of Doncaster and its aspirations for growth. The Local Plan includes targets for Finningley and for Auckley-Hayfield Green which are deliberately separate to any additional housing that may be considered appropriate for Auckley-Hayfield Green should sufficient jobs be generated at the Airport.
3.1 The level of housing development to be delivered is set out in Policy 3, which states that the council will seek 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). 3.2 Paragraph 59 of the National Planning Policy Framework (the ‘Framework’) sets out the Government’s objective of significantly boosting the supply of homes, through the identification of a sufficient amount and variety of land where it is needed and to meet the needs of groups with specific housing requirements [authors own emphasis]. 3.3 The SPRU report provided at Appendix 2 assesses the soundness of the proposed jobs-led housing requirement and the implications for the proposed spatial strategy. (SEE EMAIL FOR Appendices) 3.4 For the reasons outlined within the report, DLP objects to policy 3 of the draft Local Plan as there are found to be substantial soundness failings with the draft Local Plan resulting from a failure to test an appropriate reasonable alternative based on meeting the strategic priorities for economic development over a full 15-year plan period. These issues are compounded based on treating the housing requirement from 2018-2033 as a ‘residual total’ to account for perceived oversupply in the period 2015-2018, which has not been adequately justified. 3.5 The Council’s approach fails to accurately reflect the strategic priorities and future economic potential of the Sheffield City Region and further assessment of the proposed requirement is recommended to reflect the requirements of the revised Strategic Economic Plan (once published) and to consider recent trends in jobs growth and housing delivery across the subregion. This is anticipated to lead to a reassessment of current and future demographic trends in relation to future labour supply. 3.6 The SPRU report also concludes that arbitrary constraints to the requirement for additional development are applied, which will lead to an overreliance on extant planning commitments and historic allocations in previous iterations of the development plan. The implications of this in terms of prospects for maintaining a five year supply of deliverable sites and meeting the housing needs of different groups have not been fully assessed, however it is anticipated that there could be a failure to meet housing need, particularly in respect of affordable housing in the short to medium term, as the physical and viability related constraints that have prevented these sites being delivered to date may persist. 3.7 The report concludes that these issues are capable of remedy within the Council’s broad emerging approach to managing the distribution of growth across the spatial strategy. This acknowledges that significantly greater levels of potentially suitable growth could be provided at different tiers of the settlement hierarchy. We endorse the Council’s position that Main Towns are appropriate locations to accommodate up to 10% of the economic-led component of the housing requirement. However we also recommend the consideration of Tier 3 - Service Towns and Larger Villages as potential locations for additional growth, where sustainable growth opportunities are identified. Recommendation 3.8 The Local Plan should be updated to reflect the housing requirement of 1,073 dwellings per annum for the plan period to 2035. Justification 3.9 For the reasons set out above and within the appended SPRU report, it is correct to accommodate growth based on meeting requirements under the full assessment of jobs-led growth (1,073 dpa) for the full plan period to 2035. Summary: Policy 3. Level and Distribution of Growth 1. Have own report from the ‘Strategic Planning Resource Unit’ (SPRU) to justify a higher housing figure. 2. Fails to meet the priorities for economic development over a full 15 year period. 3. Has issue with the ‘residual total’ for 2018-2033 to account for the oversupply 15-18 - does not think this approach is justified. 4. Fails to meet the priorities of the SCR. 5. Recommend the consideration of Tier 3 - Service Towns and Larger Villages as potential locations for additional growth. 6. The Local Plan should be updated to reflect the housing requirement of 1,073 dwellings per 7. Annun for the plan period to 2035. Distribution of growth. 1. Objects to limited level of growth in a reasonably sized settlement such as Auckley. 2. Fails to meet the needs of settlements outside the main urban area. 3. Settlements close to the Airport (an economic growth priority) should have more houses 4. Underestimates the potential growth of the Airport. 5. Policy should have flexibility to have a higher proportion of housing in locations close to economic growth area. Response: As demonstrated in the Housing Topic Paper, the Local Plan is proposing an appropriate housing requirement that will meet the needs of Doncaster and its aspirations for growth. The Local Plan includes targets for Finningley and for Auckley-Hayfield Green which are deliberately separate to any additional housing that may be considered appropriate for Auckley-Hayfield Green should sufficient jobs be generated at the Airport.
There is a significant mismatch between the level of employment land allocated and the level of housing land.

The Local Plan identifies significantly more employment land than the target for Doncaster based on the standard method (585 dpa) and makes an upward adjustment to support economic growth. - The upward adjustment was based on evidence produced by PBA which recommended housing need is presented as a range between 585 dpa (the minimum) and 912 dpa. The upper limit was based on matching Jobs growth aspirations of the Sheffield City Region LEP (1,420) over the period 2016 to 2026. - However, PBA have made unjustified and unrealistic assumptions for a number of factors which all suppress the level of housing required to support future employment growth. In particular, we disagree with their assumptions about commuting, double jobbing and household formation rates. (SEE EMAIL FOR Regeneris Report)

5. Regeneris consider that: - Doncaster has one of the fastest growing economies in Yorkshire and Humber. The district has created around 24,000 jobs between 2000 and 2017, representing a growth rate of 1.1% p.a. - Doncaster’s key asset is its connectivity by road, rail and air which has made it a highly attractive location for inward investment, particularly for industrial and logistics occupiers, with over 1.1m sq m of industrial/warehouse space taken up since 2010. - The strong performance is also due to a significant improvement in key economic indicators, including skills and levels of enterprise. The business start-up rate has more than doubled since 2010 and is now in line with the national average. These improvements have removed a key barrier to growth and mean that Doncaster is well placed to continue its high rate of growth. - The Local Plan has set a target of delivering 481 hectares of employment land between 2015 and 2035 and a number of ERL’s shows there continues to be very strong market demand for industrial space in Doncaster. There is therefore strong potential for Doncaster to accommodate high levels of inward investment in future which would also drive jobs growth. - Firsure have concerns that the proposed housing requirement does not represent an appropriate figure once consideration is given to the potential for economic growth and job formation. Firsure continue to consider that an appropriate balance should be sought between employment growth aspirations and the provision of homes. - The Framework (2019) reaffirms the Governments’ commitment to ‘significantly boosting the supply of homes’ and states that ‘it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed’. It goes on to state ‘to determine the minimum number of homes need, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify and alternative approach which also reflects current and future demographic trends and market signals’. - NPPG goes on to identify the circumstances when it is appropriate to plan for a higher housing need figure than the standard methodology identifies. The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides the minimum start point in determining the number of homes needed in an area?

5.1 Firsure is concerned that the Doncaster Local Plan Draft Policies and Proposed Sites is deficient in its content and evidence base and does not reflect national guidance. Test of Soundness 5.2. Firsure considers that the Local Plan is unsound. Which test of soundness are comments about?

X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification

5.3. Firsure have a number of concerns in relation to the Level and Distribution of Growth. The concerns relate to the following:

- The Local Plan housing requirement is not sufficient and is not fully aligned with forecast economic growth. - The Local Plan identifies significantly more employment land than the target for provision established in Policy 3. - There is a significant mismatch between the level of employment land allocated and the level of housing land allocated in the Plan period; and - The identified supply is not sufficient to meet the Councils identified requirement. Need 5.4. Firsure is concerned with the proposed level of new housing being planned for in the Local Plan. Policy 3 makes provision for 18,400 dwellings to be delivered between 2015 and 2035, equivalent to 920 net new homes each year. Policy 3 states that there should be sufficient allocations for 15 years supply, which is 13,230 new homes. 5.5. Firsure has commissioned Regeneris Consulting to review the OAN and the Economic Forecasts and Housing Needs Assessment (2018). The Regeneris's report is attached to these representations. Regeneris conclude that: - The target delivers the minimum level of housing need for Doncaster based on the standard method (585 dpa) and makes an upward adjustment to support economic growth. - The impact of the adjustment was based on evidence produced by PBA which recommended housing need is presented as a range between 585 dpa (the minimum) and 912 dpa. The upper limit was based on matching Jobs growth aspirations of the Sheffield City Region LEP (1,420) over the period 2016 to 2026. - However, PBA have made unjustified and unrealistic assumptions for a number of factors which all suppress the level of housing required to support future employment growth. In particular, we disagree with their assumptions about commuting, double jobbing and household formation rates. (SEE EMAIL FOR Regeneris Report) 5.6. Regeneris consider that: - Doncaster has one of the fastest growing economies in Yorkshire and Humber. The district has created around 24,000 jobs between 2000 and 2017, representing a growth rate of 1.1% p.a. - Doncaster’s key asset is its connectivity by road, rail and air which has made it a highly attractive location for inward investment, particularly for industrial and logistics occupiers, with over 1.1m sq m of industrial/warehouse space taken up since 2010. - The strong performance is also due to a significant improvement in key economic indicators, including skills and levels of enterprise. The business start-up rate has more than doubled since 2010 and is now in line with the national average. These improvements have removed a key barrier to growth and mean that Doncaster is well placed to continue its high rate of growth. - The Local Plan has set a target of delivering 481 hectares of employment land between 2015 and 2035 and a number of ERL’s shows there continues to be very strong market demand for industrial space in Doncaster. There is therefore strong potential for Doncaster to accommodate high levels of inward investment in future which would also drive jobs growth. - Firsure have concerns that the proposed housing requirement does not represent an appropriate figure once consideration is given to the potential for economic growth and job formation. Firsure continue to consider that an appropriate balance should be sought between employment growth aspirations and the provision of homes. - The Framework (2019) reaffirms the Governments’ commitment to ‘significantly boosting the supply of homes’ and states that ‘it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed’. It goes on to state ‘to determine the minimum number of homes need, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify and alternative approach which also reflects current and future demographic trends and market signals’. - NPPG goes on to identify the circumstances when it is appropriate to plan for a higher housing need figure than the standard methodology identifies. The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides the minimum start point in determining the number of homes needed in an area?

It does not predict the impact of future government policies, changing economic circumstances or other factors that might have an impact on demographic behaviour. Therefore there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicate. 5.11. This will need to be assessed prior to and separate from, considering how much of the overall need can be accommodated. Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: 5.12. Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth. 5.13. Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; 5.14. An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground. 5.15. There may, occasionally be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced SHMA) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need that the standard model suggests'. Paragraph 010 Reference ID: 2a-010-20190220. 5.16. The Council need to recognise that the development of new housing will bring forward additional economic benefits to the area. The relationship between economic performance in an area and housing is complex, but having the right quantity, quality and balance of housing in an area is necessary for economic growth. The
development of new housing can therefore support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population which will create sustainable local jobs from the increased demand for goods and services. This provides an important sustainable development opportunity for Doncaster. 5.17. Importantly the HBF released in July 2018 its report on “the economic footprint of house building in England and Wales”, which shows that house building in England and Wales is now worth £36bn a year and supports nearly 700,000 jobs. House building activity contributes economically in different ways including providing jobs, tax revenues and contributing funding for local infrastructure and communities. House building supports the economy in a wider sense through being drive for economic growth; delivering jobs and economic value; supporting labour market mobility; creating skills and employability; enhancing place competitiveness; creating quality of place and reusing brownfield land. 5.18. An important conclusion of the report and the wider economic benefits is that a healthy, well-functioning labour market requires a good supply of housing that is affordable for local people to enable them to move jobs freely and match up skills supply with employer demand. A dysfunctional housing market can inhibit labour market mobility, in turn stifling economic growth. 5.19. Regeneris consider that Doncaster’s housing need over the plan period should be 1,100 dap to support future economic growth. Regeneris consider that the target of 920 dap would risk constraining the future economic growth of Doncaster. 5.20. Furthermore, it is evident that the council are seeking to align economic growth with housing growth and have identified provision above the local housing need figure to which the council considers accounts for Job Led growth. However, the jobs led growth figure is based on jobs growth forecast between 2015-2032. It is not clear whether consideration has been given to the additional job growth expected to the end of the plan period. Therefore Firsure consider there is potential for the jobs led scenario to underestimate the jobs growth over the full plan period. The associated uplift to the housing requirement will therefore not be sufficient to meet the full needs over the plan period. 5.21. Additionally, the Council have identified a requirement for 481 hectares of employment land based on the Job Led scenario, and accounts for the extended plan period 2032-2035. The explanatory text considers that this requirement is met through 117 hectares of land developed between 2015-2018, 201 hectares of land benefiting from planning permission, and 164 hectares of allocated sites. However, there is a discrepancy between the totals in paragraph 4.61 of the Plan and the figures arising from Tables E1 to E8. The sites that benefit from planning permission in tables E1 to E8 equate to 284.09 ha of employment land available within the Plan period. This leads to a total provision of 565.77 hectares of employment land against a requirement of 481 hectares. It should be noted that within the permissions identified in tables E1 to E8 that additional employment land is available, adding to the potential supply. There is therefore a significant mismatch between the level of planned employment provision in Policy 8 and the planned housing provision. Therefore, the housing requirement needs to be uplifted to reflect the identified level of employment land provision. 5.22. As stated above NPPG indicates that consideration can be given to delivery rates, for the last three years completions have been consistently higher than the proposed local plan target. Net completions amount to 3211 dwellings, with annual completions as follows: Year: 2015-16 Net Completions: 1,025 Year: 2016/17 Net Completions: 1,049 Year: 2017/18 Net Completions: 1,137 Year: Total Net Completions: 3,211 5.23. This demonstrates that there is sufficient demand to support a requirement above 920 dwellings per annum. 5.24. The Councils Economic Forecasts and Housing Needs Assessment (PBA, 2018) considers the housing requirement prior against both the standard methodology, standard methodology with an uplift for economic growth and previous approach for identifying housing need. Following the earlier approach, PBA consider that an aspirational job led figure, based on the SEP ambitions, would equate to a requirement of 1,073. PBA considered that it would be prudent to plan for between 562 and 1073. To ensure that the requirement was realistic. It is worthy of note that the Employment Land Needs Assessment (2019). Considers that the Job led scenario was ambitious but realistic and notes the significant growth in Doncaster within the previous 15 years in line with SCR growth aspirations. And further the evidence of land take up and jobs growth for the period 2015-2018 was on target to meet 1% growth per annum. This would support a target at the higher end of the range. 5.25. There is therefore evidence of both delivery at a higher rate and recently published evidence that indicates a higher need for housing. As stated above NPPG is clear that this evidence should be taken into account when determining the housing requirement. 5.26. When using the standard method the housing need figure was 585, applying a job led figure to match the SEP led to a requirement of 912 (PBA, 2018). However this is not based on the Jobs growth over the full plan period. 5.27. Firsure consider further evidence is required to demonstrate whether the affordable housing needs of Doncaster can be met based on a target of 920. The explanatory text states that the current need for affordable housing, 209 affordable units, represents 23 % of the Local Plan requirement for housing. Paragraph 6.9 states that this does not take into account current completions or viability. The completions affordable completions for the last three years (first three years of the Local Plan) are as follows: Year: 15/16 Affordable Completions: 151 Total Completions: 1,088 Affordable completions (%): 13.88 Year: 16/17 Affordable Completions: 161 Total Completions: 1,067 Affordable completions (%): 15.09 Year: 17/18 Affordable Completions: 166 Total Completions: 1,208 Affordable completions (%): 13.74 5.28. The total affordable completions falling below the identified affordable need, even when total completions are higher than the proposed Local Plan requirement of 920. Further, Policy 8 identifies a requirement for 23% affordable housing in high/medium value areas and 15% in low value areas. An as indicated in response to Policy 8 and Policy 67, this is demonstrated to be unviable for a number of sites, including all types of sites in low value areas. Firsure are therefore concerned that a target of 920 dwellings will not deliver sufficient number and range of affordable homes to meet the identified needs for affordable homes in the Borough. In order to deliver 209 affordable dwellings per year, a requirement of at least 1,393 would be required. This assuming the achievement of an average of 15% affordable housing, which represents the highest achieved over the last three years of monitoring. 5.29. Firsure consider that there is sufficient evidence to pointing to the need for further uplift in the Local Plan housing requirement, based on the significant mismatch between housing and employment land allocations, the need to support the local plans economic ambitions, evidence of delivery and the need to ensure sufficient delivery of affordable housing. 5.30. Firsure consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 5.31. However, Firsure consider that with a higher requirement, or at least 1,100 to meet the economic growth aspirations, and further uplifts to balance housing allocations with the employment land allocations, and to ensure that the needs for affordable homes can be met (up to 1393) that the Local Plan can be found sound. Firsure will continue to work with the Council to develop appropriate modifications to the Local Plan Housing Supply and Delivery 5.32. Firsure is concerned that the Council’s approach to delivering the housing requirement does not appear to reflect national guidance. 5.33. The Council is not demonstrating sufficient flexibility in the supply of housing land to ensure that the Plan can meet identified needs in full. The Framework is clear that plans should be sufficiently flexible to adapt to rapid change, and emphasises the importance of ensuring that a sufficient amount and variety of land can come forward where it is needed. 5.34. PPG is clear that careful attention should be given to providing an adequate supply of land, and the Plan needs to be realistic about what can be achieved and when. Authorities need to ensure that policies setting out contributions expected from development do not undermine the deliverability of the Plan. (Paragraph 59 Reference ID: 61-059-20190315. 5.35. At present based on the Councils figures presented in the Local Plan, a Plan requirement of 18400, completions equating to 3400 and allocations equating to 16,055, there is a flexibility of around 1055 dwellings which equates to 5% of the Local Plan Requirement. Firsure consider that this is insufficient given the potential for non-delivery and under delivery of sites, particularly from the dependency on a number of large sites. As set out in our response to a number of policies within the plan and specifically Policies 8, 46, 66 and 67, Firsure are concerned that some of the policies may undermine the deliverability of sites, or lead to the need for further specific site viability testing impacting on the timing of delivery and therefore there is a need for greater
flexibility in the housing supply. Specific sites are identified later in this section. 5.36. Firsure have a number of concerns relating to the supply in the Plan in terms of completions, the allocations from permissions and the new allocations. 5.37. It is noted that the supply attributed to completions appears to be resultant from gross completions rather than net completions. The Plan indicates that completions between 2015 and 2018 equate to 3400, However data in the Residential Land Availability Report indicates that net completions amount to 3211. Which would serve to increase the residual requirement based on an OAN of 920 to at least 15,189, and reduce the flexibility in the Plan to 866 dwellings (4.7%). 5.38. With regards to overall supply from permissions and allocations, a housing trajectory has been provided. Firsure are concerned that this demonstrates that the Council will struggle to maintain a continuous supply of housing particularly in the later phases of the Plan period. Only four sites are identified as being capable of delivery in the final years of the plan period and two sites delivering beyond the plan period. 5.39. Furthermore, the Council’s HELAA and Residential Land Availability Report have a base date of March 2018, thus a whole monitoring year is presently absent. This evidence base should therefore be updated. 5.40. In terms of existing commitments it appears that the Council assumes 100% delivery and no discount has been applied. Best Practice and Guidance suggests that at least a 10% discount should be applied on sites with extant planning permission but this could vary depending on site specific constraints and complexity. Firsure supports the discounting of sites with planning permission but consider it may be beneficial to include a higher level of discount for large sites to take into account unforeseen circumstances and delivery delays. Firsure consider therefore that from a commitments pot of 9,488 dwellings a discount of at least circa 948 should be applied, however this could feasibly be higher given the history and constraints of a number of sites. 5.41. Firsure is concerned with the reliance on some existing housing sites with planning permission and their potential delivery, particularly as some are fairly historic brownfield sites with viability concerns in market challenging areas. There are a considerable number of outstanding planning permissions in poor market areas, some of which are also constrained by flood risk. Evidence of developer interest in such sites should be a fundamental requirement to provide confidence on delivery. For example, a brief review of some sites being shown as commitments shows considerable concern: Site Ref: 838 Site Name: Henxthorpe No. of Dwellings: 930 Firsure Comment: There have been a number of planning applications and proposed schemes over the years, but there has been no delivery on site. Countryside PLC has submitted a planning application which the Environment Agency has objected to and recommended refusal. There is conflicting evidence in terms of delivery rates, with the Local Plan and the HELAA. There are significant financial constraints affecting the site. No further deliverability evidence has been produced in the Doncaster 5 Year Deliverable Housing Land Supply Statement. The Residential Land Availability Study notes that at 31/03/2018 there were no completions and the site is not currently being developed. Site Ref: 843 Site Name: Manor Farm, Bessacarr No. of Dwellings: 1,009 Firsure Comment: This is a Persimmon / Charles Church scheme. However, delivery has become frustrated by the need to deliver infrastructure to complete development. Since there is only one developer on the site the development trajectory is likely to be modest and development of the site is unlikely to be achieved during the plan period. The Residential Land Availability Report indicates 39 completed in 17/18 which is below the rates expected in the Local Plan and HELAA. Which assumes delivery rates of around 70 dwellings a year. This is not realistic based on current delivery. Site Ref: 418 Site Name: Unity/DN7 Initiative No. of Dwellings: 905 Firsure Comment: The site has outline planning permission for 3,100 homes. No reserved matters have been submitted The site is in significant multiple ownership and understand that CPO procedures will be employed to facilitate the delivery of requisite infrastructure. Homes England is also assigning public funding to support the development. Given the presence of multiple landowners, the need for considerable public funding, the likelihood of a protracted timeframe to open up the site for development and the absence of confirmed market interest, the site is unlikely to deliver the Council’s prediction of 1015 homes in the plan period. The HELAA does not anticipate a start on site until years 6 to 10. However the local plan indicates a 175 completions in the first five years. Higher rates of delivery are expected in the following years (70 dwellings per annum). These rates are overly optimistic especially when compared to annual completions for individual sites recorded in the residential land availability report. Site Ref: 569 Site Name: Askern Saw Mills No. of Dwellings: 220 Firsure Comment: This is a long standing, unimplemented planning permission that has been available but has remained undeveloped. There is no developer interest and consequently the assumed delivery of 220 new homes is optimistic. Indicated in the Residential Land Availability Report that the outline permission has lapsed. Site Ref: 984 Site Name: Former McCormick Tractors No. of Dwellings: 600 Firsure Comment: This site has significant constraints. There is an outline permission relating to the development of the site. The Local Plan assumes a delivery rate of 56 dwellings per in the first five years and 64 dwellings per annum in the following years. This is overly optimistic and not consistent with the planning status and constraints on site. Site Ref: 940 E1 and E2 Site Name: Land east of Poplars Farm No. of Dwellings: 280/920 Firsure Comment: Site 940 is allocated in the plan for development of up to 280 dwellings (Part E1), Part E2 is identified as a reserved housing site for up to 920 dwellings. This site does not form a true reserve site. The council have identified a release mechanism which restricts the release of housing to net additional jobs delivered at the airport. 5.42. Firsure understands that no allowance has been made for demolitions. No evidence is apparent and Firsure consider it would be appropriate for this evidence to be forthcoming. 5.43. The availability of land is crucial. To be considered deliverable the site needs to be available now and in terms of developable there needs to be a reasonable prospect that land will be available at the point envisaged. Firsure consider that sites which are not available or are unknown should not be included in the Plan or a buffer should be provided due to the uncertainty on delivery. Site Ref: 1028 Site Name: Tickhill No. of Dwellings: 74 Firsure Comment: This site does not have access, therefore cannot be considered to be deliverable. Further, the capacity of the site is unrealistic. This is a 1.5 hectare site, a capacity of 44 dwellings would reflect the assumptions on net to gross developable area and density set out in the Viability Study. Site Ref: 662/247 Site Name: Colliery Site, Rossington No. of Dwellings: 897/237 Firsure Comment: The delivery rates on the site are overly optimistic. In 2017/18 there were only 49 completions on site 662. Assuming delivery rates based on past performance at this site then it is considered that only 600 dwellings will be capable of coming forward within the Plan period. This is significantly less than the 1127 homes forecast within the Plan. Site Ref: 081/343 Site Name: Thorne No. of Dwellings: 207 Firsure Comment: This is a longstanding allocation and there is little evidence available through the council’s evidence base to demonstrate that the site will come to market in the short to medium term. Site Ref: Thorne No. of Dwellings: 13 Firsure Comment: This site has permission which has since lapsed. There appears to be little developer interest in this site. The site is not considered to be deliverable. Site Ref: 510 Site Name: Thorne No. of Dwellings: 25 Firsure Comment: This is a narrow and constrained infill site, with railway forming the southern boundary of the site. There is little evident available through the Councils evidence base to indicate any developer interest in the site. Site Ref: 165/186 Site Name: Carcroft No. of Dwellings: 300 Firsure Comment: This site is located to the western edge of the settlement and is relatively distant from the key services and facilities such as the train station, and employment opportunities. Other sites are located nearer to key services. 5.44. A high level assessment of some of the proposed allocations shows that some proposals are at risk and hence one of the reasons why Best Practice suggests a buffer to the housing requirement should be included in the Plan. Furthermore, would appear to have lent heavily on allocating sites that already have planning permission as an alternative to identifying a sufficient supply of new allocation sites to meet its requirement for the plan period. Consequently, a number of settlements with strong sustainability credentials would appear to have insufficient allocations to meet their needs through the life of the plan. 5.45. It would appear in some instances that there are unrealistic assumptions on gross to net developable site areas and on the resultant yields from proposed allocations, especially when considering some of the development requirements. Firsure therefore suggest that further sites should be identified. 5.46. The Council therefore need a wider choice of sites across a number of different areas and market areas to gain traction and increase build rates. To achieve the housing requirement the Council need at least 30-35 housing outlets operating across the Borough for every year of the
Plan and Firsure do not believe the Plan can deliver this, particularly in the middle to later years. 5.47. Firsure considers the Council should be more realistic on the potential delivery on sites, particularly on sites which have not commenced preparations of securing the relevant planning permission and developer interest and on build rates. Firsure consider that the sites with no planning permission should not be providing completions until 2023/24 (which is two years post adoption) as there is significant work and preparations to commence on site, including time to prepare and submit the planning application, gain planning permission, discharge conditions, legal agreements, site preparations, and construction of the housing/employment building. This process can take around 2 years. 5.48. Firsure would be happy to work through the specific sites in detail with the Council to seek to reach agreement on the HELAA and current housing commitments. Interestingly, in line with the general direction of travel for this Local Plan the new Framework (2019) defines the term Deliverable in the glossary stating that sites can only be considered deliverable where they have detailed planning permission if they have outline planning permission or are allocated in a plan a site can only be considered if there is clear evidence that housing completions will begin on site within five years. The level of evidence that must be provided to demonstrate that sites are deliverable has therefore been tightened. 5.49. Firsure considers that the main risks to the delivery of the housing requirement are slippages in the delivery of allocations, longer lead-in times, reduced housing capacity on sites, sites no longer coming forward as result of viability from policy obligations set out in the Local Plan. Given these risks Firsure would suggest a greater flexibility is incorporated into the Local Plan especially in light of Firsure' conclusions on the actual housing requirement. 5.50. Firsure would encourage the Council to review the existing commitments to ensure this is still deliverable, whether there is a housebuilder on board and whether there are any constraints preventing development from coming forward. Firsure would also ask the Council to look at the proposed delivery of site allocations to determine whether the delivery rates are appropriate and the sites are deliverable in light of the policy obligations proposed in the Local Plan.

5.51. Taking into account the above, the Council should be making provision for: Annual Housing Requirement Council Figures: 920 Firsure’s View: 1,100 Total Requirement (2015-2035) - which is 15 years post adoption Council Figures: 18,400 Firsure’s View: 22,000 Completions Council Figures: 3,400 Firsure's View: 3,211 Total Commitments Council Figures: 9,488 Firsure’s View: 9,488 Non-Delivery Allowance (at least 10%) Council Figures: 948.8 Firsure’s View: 948.8 Total Allocations Council Figures: 6,567 Firsure’s View: 6,567 Total Supply Council Figures: 18,506 Firsure's View: 18,317.2 Residual homes to be identified Council Figures: -106.2 Firsure’s View: 3,682.2. 5.52. Therefore, on a best case scenario Firsure consider as a minimum there needs to be circa 3,682 new homes to be identified in the Plan to account for net completions, and economic growth. 5.53. This does not account for the uplift required to ensure affordable housing need is met in full, which as indicated in paragraph 5.28, would lead to a requirement of 1,393 dpa and a plan requirement of 27,860. Based on the current supply of 3,211 completions, 9,488 commitments, an allowance for 10% non-implementation, and the currently proposed allocations of 6,567 homes, this would lead to need for a further 9,542 additional homes. 5.54. Significantly, the scenarios above do not balance housing provision with the additional employment allocations. The additional employment allocations amount to 83.77 hectares above the requirement, this is the equivalent of an additional 3.5 years supply of land. As a result in order to balance the housing provision with the additional employment supply circa 3850 additional homes would be required, this amounts to an annual requirement of 1,292.5 dpa. Firsure consider circa 7,532 additional homes are required in order to balance the Housing with Employment supply, account for net completions and appropriate non-implementation rates. Employment requirement 2015-2035 Firsure’s View: 481 hectares Annual employment requirement Firsure’s View: 24 hectares Employment land developed 2015-2018 Firsure’s View: 117 Sites with planning permission Tables E1 to E8 Firsure’s View: 284.09 New employment allocations Policy 4 Firsure’s View: 164.6 Total Allocations Firsure’s View: 565.77 Amount of land allocated over the requirement Firsure’s View: 83.77 Additional homes required to balance with employment land supply Firsure’s View: 3,850 Residual homes to be identified Firsure’s View: 7,532.2 5.55. These figures assume no changes to the currently identified housing sites, which, in response to policy 3 and policy 6, Firsure have raised significant concerns, particularly with regards the deliverability, capacity, and delivery rates of some sites and the overreliance on existing permissions or longstanding allocations. This does not account for additional economic growth associated with the airport 5.56. Furthermore, there does not appear to be any safeguarded sites or genuinely deliverable reserve sites identified within the Draft Plan. This is concerning given Policy 6 states that the Plan will designated Reserve Development Sites. However, it states that the reserves sites identified are not considered developable in the plan period. Paragraph 4.43 of the Plan indicates that the reserve sites have flood risk mitigation issues or safeguarding issues associated with HS2 preventing them from coming forward. Firsure would suggest, in order to assist with flexibility, that safeguarded sites be proposed in accordance with national guidance. The only other reserve site is related to direct job growth at the Airport and associated with HS2 preventing them from coming forward. Firsure would also ask the Council to look at the proposed delivery of site allocations, and to review the allocations, and the currently proposed allocations of 6,567 homes, this would lead to need for a further 9,542 additional homes. 5.54. Significantly, the scenarios above do not balance housing provision with the additional employment allocations. The additional employment allocations amount to 83.77 hectares above the requirement, this is the equivalent of an additional 3.5 years supply of land. As a result in order to balance the housing provision with the additional employment supply circa 3850 additional homes would be required, this amounts to an annual requirement of 1,292.5 dpa. 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Firsure would suggest, in order to assist with flexibility, that safeguarded sites be proposed in accordance with national guidance. The only other reserve site is related to direct job growth at the Airport and is strictly controlled, thus does not provide flexibility for the Plan as a whole. 5.57. The above scenarios do not include a detailed analysis of existing commitments and proposed allocations, however from a high level analysis it is evident that the Council’s trajectory and analysis of sites is optimistic. 5.58. Therefore, with an increased housing requirement, reduced potential from existing planning permissions sites and incorporation of a flexibility allowance, further land will need to be identified. 5.59. Firsure consider that the appropriate areas and sites to accommodate growth would be: - Site 302 and 305: Stripe Road, Rossington 5.60. A brief summary is provided for this site in response to Policy 3. Technical There is a significant mismatch between the level of employment land allocated and the level of housing land allocated in the Plan period; and - The identified supply is not sufficient to meet the Councils identified requirement. Need Firsure commissioned Regeneris Consulting to review the OAN and the Economic Forecasts and Housing Needs Assessment (2018) who conclude that: - The target delivers the minimum level of housing need for Doncaster based on the standard method (585 dpa) and makes an upward adjustment to support economic growth. - The upward adjustment was based on evidence produced by PBA which recommended housing need is presented as a range between 585 dpa (the minimum) and 912 dpa. The upper limit was based on matching Jobs growth aspirations of the Sheffield City Region LEP (1,420) over the period 2016 to 2026. However, PBA have made unjustified and unrealistic assumptions for a number of factors which all suppress the level of housing required to support future employment growth. In particular, we disagree with their assumptions about commuting, double jobbing and household formation rates. Regeneris consider that Doncaster’s housing need over the plan period should be 1,100 dpa to support future
economic growth. Regeneris consider that the target of 920 dpa would risk constraining the future economic growth of Doncaster. Firsure consider there is potential for the jobs led scenario to underestimate the jobs growth over the full plan period. The associated uplift to the housing requirement will therefore not be sufficient to meet the full needs over the plan period. The Council have identified a requirement for 481 hectares of employment land based on the Job Led scenario, and accounting for the extended plan period between 2032 and 2035. The explanatory text considers that this requirement is met through 117 hectares of land developed between 2015-2018, 201 hectares of land benefiting from planning permissions granted 164 hectares of allocated sites. However, there is a discrepancy between the totals in paragraph 4.61 of the Plan and the figures arising from Tables E1 to E8. The sites that benefit from planning permission in tables E1 to E8 equate to 284.09 ha of employment land available within the Plan period. This leads to a total provision of 565.77 hectares of employment land against a requirement of 481 hectares. It should be noted that within the permissions identified in tables E1 to E8 that additional employment land is available, adding to the supply. There is therefore a significant mismatch between the level of planned employment provision in Policy 4 and the planned housing provision. Therefore, the housing requirement needs to be uplifted to reflect the identified level of employment land provision. NPPG indicates that consideration can be given to delivery rates, for the last three years completions have been consistently higher than the proposed local plan target. This demonstrates that there is sufficient demand to support a requirement above 920 dwellings per annum. The Councils Economic Forecasts and Housing Needs Assessment (PBA, 2018) considers that an aspirational job led figure, based on the SEP ambitions, would equate to a requirement of 1,073. PBA considered that it would be prudent to plan for between 562 and 1073. There is therefore evidence of both delivery at a higher rate and recently published evidence that indicates a higher need for housing. Firsure are concerned that a target of 920 dwellings will not deliver sufficient number and range of affordable homes to meet the identified need for affordable homes in the Borough. In order to deliver 209 affordable dwellings per year, a requirement of at least 1,393 would be required. This assuming the achievement of an average of 15% affordable housing, which represents the highest achieved over the last three years of monitoring. Firsure consider that there is sufficient evidence to pointing to the need for further uplift in the Local Plan housing requirement, based on the significant mismatch between housing and employment land allocations, the need to support the local plans economic ambitions, evidence of delivery and the need to ensure sufficient delivery of affordable housing. Housing Supply and Delivery: At present based on the Councils figures presented in the Local Plan, a Plan requirement of 18,400, completions equating to 3400 and allocations equating to 16,055, there is a flexibility of around 1055 dwellings which equates to 5% of the Local Plan Requirement. Firsure consider that this is insufficient given the potential for non-delivery and under delivery of sites, particularly from the dependency on a number of large sites. As set out in our response to a number of policies within the plan and specifically Policies 8, 46, 66 and 67, Firsure are concerned that some of the policies may undermine the deliverability of sites. Firsure have a number of concerns relating to the supply in the Plan in terms of completions, the allocations from permissions and the new allocations. It is noted that the supply attributed to completions appears to be resultant from gross completions rather than net completions. The Plan indicates that completions between 2015 and 2018 equate to 3400, However data in the Residential Land Availability Report indicates that net completions amount to 3211. Which would serve to increase the residual requirement based on an OAN of 920 to at least 15,189, and reduce the flexibility to 284.09 ha of employment land available within the Plan period. The housing trajectory demonstrates that the Council will struggle to maintain a continuous supply of housing particularly in the later phases of the Plan period. Only four sites are identified as being capable of delivery in the final years of the plan period and two sites delivering beyond the plan period. In terms of existing commitments it appears that the Council assumes 100% delivery and no discount has been applied. Best Practice and Guidance suggests that at least a 10% discount should be applied on sites with extant planning permission but this could vary depending on site specific constraints and complexity. Firsure supports the discounting of sites with planning permission but consider it may be beneficial to include a higher level of discount for large sites to take into account unforeseen circumstances and delivery delays. Firsure consider therefore that from a commitments pot of 9,488 dwellings a discount of at least circa 948 should be applied, however this could feasibly be higher given the history and constraints of a number of sites. Firsure is concerned with the reliance on some existing housing sites with planning permission and their potential delivery, particularly as some are fairly historic brownfield sites with viability concerns in market challenging areas. There are a considerable number of outstanding planning permissions in poor market areas, some of which are also constrained by flood risk. Evidence of developer interest in such sites should be a fundamental requirement to provide confidence on delivery. For example, a brief review (provided) of some sites being shown as commitments shows considerable concern. The Council therefore need a wider choice of sites across a number of different areas and market areas to gain traction and increase build rates. To achieve the housing requirement the Council need at least 30-35 housing outlets operating across the Borough for every year of the Plan and Firsure do not believe the Plan can deliver this, particularly in the middle to later years. Firsure considers the Council should be more realistic on the potential delivery on sites, particularly on sites which have not commenced preparations of securing the relevant planning permission and developer interest and on build rates. Firsure consider that the sites with no planning permission should not be providing commitments until 2023/24 (which is two years post adoption) as there is significant work and preparations to commence on site, including time to prepare and submit the planning application, gain planning permission, discharge conditions, legal agreements, site preparations, and commence housing development. This process can take around 2 years. Firsure considers that the main risks to the delivery of the housing requirement are slippages in the delivery of allocations, longer lead-in times, reduced housing capacity on sites, sites no longer coming forward as result of viability from policy obligations set out in the Local Plan. Given these risks Firsure would suggest a greater flexibility is incorporated into the Local Plan especially in light of Firsure’s conclusions on the actual housing requirement. Firsure would encourage the Council to review the existing commitments to ensure this is still deliverable, whether there is a house builder on board and whether there are any constraints preventing development from coming forward. Firsure would also ask the Council to look at the proposed delivery of site allocations to determine whether the delivery rates are appropriate and the sites are deliverable in light of the policy obligations proposed in the Local Plan. Taking into account the above, on a best case scenario Firsure considers as a minimum requirement to be circa 3,682 new homes to be identified in the Plan to account for net completions, and economic growth. This does not account for the uplift required to ensure affordable housing need is met in full which would lead to a requirement of 1,393 dpa and a plan requirement of 27,860. Based on the current supply of 3,211 completions, 9,488 commitments, an allowance for 10% non-implementation, and the currently proposed allocations of 6,567 homes, this would lead to need for a further 9,542 additional homes. Significantly, the scenarios above do not balance housing provision with the additional employment allocations. The additional employment allocations amount to 83.77 hectares above the requirement, this is the equivalent of an additional 3.5 years supply of land. As a result in order to balance the housing provision with the additional employment supply circa 3,850 additional homes would be required, this amounts to an annual requirement of 1292.5 dpa. Firsure consider circa 7,532 additional homes are required in order to balance the Housing with Employment supply, account for net completions and appropriate non-implementation rates. These figures assume no changes to the currently identified housing sites, which, in response to policy 3 and policy 6, Firsure have raised significant concerns, particularly with regards the deliverability, capacity, and delivery rates of some sites and the overreliance on existing permissions or longstanding allocations. These does not account for additional economic growth associated with the airport. With an increased housing requirement, reduced potential from existing planning permissions and incorporation of a flexibility allowance, further land will need to be identified. Firsure consider that the appropriate areas and sites to accommodate growth would be: - Site 302 and 305: Stripe Road, Rossington Proposed Change To overcome the objection and address soundness matters, the Council should: - Increase housing requirements to 1,100 to 1,300 dwellings over the plan period.
Reduce the potential from current commitments and include a non-delivery allowance. - Identify safeguarded land. - Allocate 302 and 305: Stripe Road, Rossington

Response:

The Peter Brett’s report assesses the employment and housing target for the borough and ties the two together to ensure the right amount of houses are provided for the projected growth. The Council are confident that this report provides a sound and realistic figure. Many ways have been submitted to the Council about how the housing and employment figures could be derived. The submission Local Plan included a range, but still plans for enough housing to meet the requirement of 920dpa over the plan period - the use of a range does not prejudice this. 920dpa is the assessed level of housing required under the revised NPPF, 1,073 refers to the figure using the previous NPPF, which is now redundant. It should also be noted the PBA report states a mid-way point between 585 and 920 could be used, which the Council elected not to do. The Local Plan is planning for 57% more housing than the Standard Methodology proposed, and in doing so the Council have taken on board national policy and guidance. The jobs requirement covers the period 2015 - 35, and enough housing is planned for to match this - there is no reason to uplift this further, including for affordable housing. There is additional flexibility in housing delivery, as the plan does not factor in to its calculations windfalls; sites of 1-4 units; any development in Defined Villages; the proposed 280 dwellings at the airport + possible 920 further linked to job delivery; and the potential of Reserve Development Sites to deliver housing. If all these are factored in, then there is a total potential supply of 24,880 + future windfalls and potential empty homes coming into use, which is 6,480 above the 20 year requirement of 18,400, or in effect a buffer of 35%. Trajectories and other matters raised or covered in the Housing Topic Paper. The RLA has been updated for 2019 now. Consideration has been given to site constraints and delivery, and factored in where appropriate - this is discussed in the Site Selection Methodology and Housing Topic Paper. With regards to sites 302 and 305, these sites are in the Green Belt and as set out in the Green Belt Topic Paper, there are no exceptional circumstances which justify the release of these sites in this location, nor is there justification to safeguard sites.
Comment Ref: C/Policy 3: Site 139/05256/1/005

Attend Examination: Attend Hearing

Reason: Housing delivery in Mexborough

Area: Chapter 4: Strategic Approach

Policy: Policy 3: Level & Distribution of Growth

Tests of Soundness: Positively prepared

Consistent with national

Comment:
The distribution of housing throughout the district is set out initially in Core Strategy Policy CS2 (adopted 2012) Table 1: Settlement Hierarchy. Mexborough was identified as a principle town that should accommodate between 646 to 923 dwellings. This was then amended in the Draft Local plan in 2018, when a range of 475 to 1140 was proposed in Mexborough. This has been further amended within the Doncaster Local Plan Publication Version, which states a housing delivery target of 475 - 985 during the Plan period. “Housing allocations and mixed-use allocations to accommodate economic-led housing growth are directed to the most sustainable and deliverable urban and urban extension sites in the Doncaster Main Urban Area and Main Towns in accordance with the growth ranges set out in Policy 3 and in accordance with a sequential approach to flood risk.” Settlement: Mexborough Local Plan target (Publication Version): 475-985 Allocations with planning permission (as at 1st April 2018): 268 Allocations without planning permission (as at 1st April 2018): 202 Allocated Total: 470 Shortfall/Surplus: A shortfall of between 5 and 515. With Mexborough being one of the most sustainable settlements in Doncaster, it should be positively planned to deliver a high quantum of housing. The council’s allocations to aim for the lower quantum of housing in Mexborough is strongly objected to, as this would not meet the requirements of the settlement given its sustainability and role to deliver housing in Doncaster and for the Council to meet their aims and objectives. Site 139 will assist in driving economic led housing growth in Mexborough, which the Council identifies as one of the most sustainable urban areas within the district. As stated in the site Doncaster Draft Policies & Proposed Sites (2018), paragraph 9.1.23 ‘Permissions and the above additional allocations provides a settlement allocation of 532 dwellings against a target of 475 - 1,040 which, although provides for the full local need target, goes little towards providing the economic-growth led housing for one of the largest Main Towns outside of Doncaster.’ The Site allows for an urban extension in a highly sustainable area which is in Flood Zone 1. As per the NPPF, paragraph 11, The Presumption in favour of sustainable development, for Plan Making means that: a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; It is considered that the Plan, in relation to Mexborough, does not positively seek opportunities to meet the development needs of their area, and is therefore not consistent with National Policy, and thus not sound.

Summary:
Policy 3 Level and distribution of growth 1. Object to lowering of housing figure for Mexborough (down from Core Strategy and 2018 draft Policies and site allocation consultation). 2. LP proposed allocation will not meet the needs of the settlement. 3. Plan fails to meet the development needs of Mexborough and therefore is not consistent with NPPF (para 11 (a))

Response:
The Local Plan will replace the Core Strategy in due course. That development plan was prepared under a previous Government’s national planning policy that pre-dated NPPF and was based on a (higher) non-objectively assessed housing need requirement and contained a less dispersed spatial strategy compared to the emerging Local Plan and hence the difference in the settlement’s housing target. Such matters have been consulted on and considered afresh through Reg 18 stages (e.g. Issues & Options/ Homes & Settlements) and the associated Sustainability Appraisal. It was not the Council’s aim to allocate a relatively low level of housing to the settlement of Mexborough, and this is reflected in the subsequent Policy 3 range of 475-985 new homes and is comparable to the other Main Towns’ targets. The fact more housing has not been subsequently allocated to the Town is a result of the findings of the Site Selection Methodology process which is compounded by the constraints to growth at Mexborough - not least the proposed route of HS2 to the east of the settlement which is safeguarded under Direction of the Secretary of State. In line with previous Local Plan consultations, where a settlement’s housing target (or within the range in the case of the Main Towns) has not been met (identified) through allocations, the requirement is redistributed and made good by allocations elsewhere at the Main Urban Area and/or Main Towns.
Avison Young has been instructed by Taylor Wimpey (Yorkshire) to prepare and submit representations to the Doncaster Local Plan Publication Draft (August-September 2019) Consultation (hereafter referred to as the 'Draft Local Plan'). Taylor Wimpey is the freehold landowner of a site located to the south of Balby which is identified in the Draft Local Plan as an Open Space Policy Area (Policy RL1). An extract of the site (with the site outlined in red) from the Draft Local Plan Proposals Map is provided below.  (SEE EMAIL FOR Plan) Site Context The site is located to the south west of the centre of Balby, adjacent to the A1(M) and in between extensive existing residential development on Woburn Close to the west, Cedar Road to the north and Croft Road to the east. The site is accessed from Cedar Road to the north and is approximately 4.1ha in size. The site is located in Flood Zone 1 and there are no listed buildings or heritage assets on or in close proximity to the site. It is located outside of the defined Green Belt boundary and as mentioned above, within existing residential development. Within the Council’s Green Space Audit (2013) which forms part of the Draft Local Plan evidence base, the site is identified as 'Informal' Open Space located in the Balby Community Profile Area. Site analysis and Draft Local Plan Consultation The purpose of this consultation is to establish whether the Draft Local Plan is legally compliant and sound. In order to determine if the Draft Local Plan is sound, it needs to meet the following four tests of soundness: - Positively prepared - so it meets the required objectively assessed needs for housing and other development - Justified - the plan should be based on evidence and be an appropriate strategy for the Borough - Effective - the plan should enable sustainable development and be consistent with the NPPF. The Draft Local Plan identifies at Policy 3, that the Local Plan's strategic aim is to facilitate the delivery of 18,400 new homes in the period 2015-2035, which equates to 920 dwellings per annum (dpa), with sufficient land allocated to deliver 15 years' supply of housing (13,230, or 882 dpa between 2018 and 2033). It goes onto identify the housing requirement as a range, within the top of the range being the 920 dpa and the bottom of the range being the local housing need. In order to meet this housing aim, at least 50% of new homes will be directed to the 'Main Urban Area' (of which Balby is included), approximately 40% to the 'Main Towns' and about 10% to the 'Service Towns and Villages'. One of the key elements of the NPPF is the provision of sufficient homes of the right type and quality in the most appropriate places. In order for the Council to deliver their strategic aims and the needs for housing, a number of housing allocations are identified, some of which are located within Balby and in close proximity of the site. We consider that the housing need set out in the Draft Local Plan does not provide sufficient homes of the right type and quality to meet the needs of Doncaster for three reasons - 1) the housing need identified is insufficient; 2) the land allocated for housing does not provide sufficient homes against the identified need; and 3) viability appraisals of the Local Plan suggest the draft allocations cannot deliver the proportion of affordable housing sought. Firstly, the proposed housing need of up to 920 dpa is considered insufficient when taking into account the Draft Local Plan's evidence base and other material information. For example, Doncaster's housing need is evidenced in the Economic Forecasts and Housing Needs Assessment (2018). The report identified that the demographic starting point from the 2014-based household projections of 562 dpa, which when adjusted to match a 'business as usual' job forecast equates to 579 dpa. However, the report identifies that a figure of 1,073 dpa is required to match the jobs growth aspiration of the Sheffield City Region. This figure is much closer to the housing need identified in Doncaster's adopted Core Strategy of 1,230 dpa for the period 2011-2018. Whilst it is recognised that the Standard Housing Methodology suggests lower figures, Paragraph 010 ref 2a-010-20190220 of the Planning Practice Guidance (PPG) identifies that “the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area? therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates". It goes onto state that circumstances where this may be appropriate includes growth strategies for the area, strategic infrastructure improvements, previous levels of housing delivery or where previous assessment of housing need are significantly higher than the standard model suggests. We therefore consider that a housing need figure of 1,073 dpa is established to reflect local circumstances, specifically the growth strategy of the Sheffield City Region and the previous assessments of housing need. Secondly, and notwithstanding our previous comments on housing need, there seems to be a discrepancy in the plan around the housing requirement of 920 dpa and the housing supply of 882 dpa as identified in Policy 3. As written, it does not appear that the Draft Local Plan is meeting its housing requirement over the plan period. As such, we consider that there is a need to plan for additional deliverable and developable housing sites to ensure a sufficient and continuous supply of housing over the lifetime of the plan, providing an element of flexibility for instances when sites do not come forward as planned. Therefore, the Draft Local Plan should allocate more sites than required to meet its housing requirement in order to maintain a buffer to deal with any under delivery. This approach is consistent with the NPPF requirements for Local Plans to be positively prepared and flexible in order to adapt to rapid change. In light of these matters, we do not consider that the Draft Local Plan is positively prepared, justified or consistent with national policy. In order for it to be sound, we believe the housing requirement identified in the Draft Local Plan should be increased and in doing so we propose that our client’s site should be allocated for housing either in whole or in part. The site is available for development, being owned by a willing landowner who is a national housebuilder and has constructed a significant number of new homes in Doncaster and the wider region, including current developments at Rossington and Finningley. It is suitable, given its sustainable location within walking and cycling distances to nearby local amenities and within the Borough's Main Urban Area which is the principal focus for new housing. It is located close to a number of shops, services and open space and is in walking distance of Mallard Primary School and Saint Peter’s Church, and various GP surgeries, a dentist, other necessary community services and public transport connections to Doncaster, Sheffield, Barnsley and Rotherham. Finally, the site is viable,
being a largely flat site with good existing access to the highway network off Cedar Road and no known impediments to its development. It is recognised that the site is allocated as ‘informal’ open space but given the level of need to allocate further deliverable and viable sites, we consider that the allocation of the site should be given serious consideration in order to ensure the Discount Local Plan is able to deliver sufficient homes in the right place. Furthermore, residential development of part of the land could maintain an element of the open space to ensure a better quality of space is provided for existing and future residents in this locality. Finally, it should also be noted that Policy 8 requires housing sites of 15+ homes or sites of 0.5ha+ in the Borough’s high value housing market areas to include 23% affordable homes. For elsewhere in the Borough, this figure drops to 15%. The Council’s Whole Plan Viability Testing - Update (2019) which provides an update to the 2016 viability assessment, identifies viability issues with a number of the draft allocations for housing. It concludes that allocations within medium and low value areas could not deliver the required levels of affordable housing and other contributions to physical and social infrastructure in accordance with the Draft Local Plan. Given the viability requirements set out in the updated PPG, which requires viability matters to be dealt with at the Local Plan stage, it is vital that the Draft Local Plan seeks to allocate land which can meet all policy requirements. In this regard, our client’s site is considered a viable proposal which can positively contribute to the Borough’s affordable housing requirements by providing a number of well needed affordable homes in the area. I hope the above response is clear and helpful. Should you have any questions or wish to discuss the representation further please do not hesitate to contact me.

Summary:

Issue. 1 Housing requirement figure and site at cedar Road Balby allocated as ‘open space. Sport &recreation’ in the Local Plan. Main arguments: 1. Housing requirement should be increased it is insufficient. 2. Proposing that the cedar Road site should be allocated for Housing to meet the increased need. 3. Housing figure (920 dpa) does not provide sufficient homes of the right type and quality to meet Doncaster’s needs. 4. Housing figure should be 1,073 not 920 dpa as per the ‘needs assessment’ this figure is closer to the Core Strategy figure of 1,230. 5. LP does not met the housing requirement over the plan period - there is a discrepancy in the figures in Policy 3 re the requirement being 920 and the supply being 882 dpa. 6. Sites allocated do not provide enough homes against the identified need. 7. Viability appraisal of the sites suggest the draft allocations cannot deliver the proportion of affordable housing sought. 8. There is a need to plan for more deliverable/develable sites to ensure a continuous supply. The Cedar Road site: 1. Suitable/deliverable/viable. 2. Has good access to services. 3. Can positively contribute to the affordable housing required.

Response:

The 1,073 requirement figure is taken from the PBA Report, but it is based on the 2012 NPPF so the 920 figure (or 912 as per the PBA Report) is an appropriate requirement and is a significant uplift to the standard methodology. More details are set out in the PBA Report under the section Housing Numbers Under the New Planning System as well as the supporting Housing & Strategy Background Paper which was published alongside the Publication stage. The Core Strategy was prepared under previous Government’s national planning policy and was a non-objectively assessed housing target that was derived via the Regional Spatial Strategy where subsequent Court decisions made clear were not compliant with the 2012 NPPF. The plan period requirement is 920 net dpa. Completions first 3 years (3,400) result in the residual requirement of 882dpa - see Policy 6 for detailed breakdown on this. Allocations have been made that far exceed the actual housing requirement and there are additional sources of supply identified in addition to this so a buffer is built into the allocations already. A buffer on top therefore would be buffering a supply that has already been buffered. Further detail is provided at Policy 6 and the Site Selection Methodology. The viability testing considers a number of different viability scenarios. This includes the ‘base’ appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific ‘low-cost’ developer model (Sensitivity Test 10 Pg 119) where urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in. Comments in respect to the availability and deliverability of the Representation’s site in Balby are noted; the site has not so far been promoted through the Local Plan process as being available for housing.
HLM/HBD OBJECTS to Policy 3. There are a number of issues with this policy that we consider fail the tests of soundness. Level of Housing Growth Policy 3 explains that the strategic aim of the Plan is to deliver 18,400 new homes for the period 2015-2035 (920 per annum). The rationale for this approach is set out in the Economic Forecasts and Housing Needs Assessment (Peter Brett Associates - June 2018). At the time of the publication of the PBA report, they set out two possible scenarios given the then impending publication of the revised NPPF, one based on the 'old' NPPF (2012) and an alternative projection on the draft policies of the new NPPF. Since the revised NPPF is now published and the transition arrangement deadline has past, it is against the new NPPF that the housing requirement will be judged. Paragraph 60 of the NPPF (2019) states “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. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.” The PPG (Paragraph: 010 Reference ID: 2a-010-20190220) sets out circumstances where it might be appropriate to plan for a higher housing need figure than the standard method derives. It states: “Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: - growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals); - strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or - an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.” Firstly, it is recognised that Doncaster is not limiting its housing requirement to the base level derived by the standard methodology and has applied a job growth adjustment to arrive at a development range that is significantly higher than Adwick & Woodlands. Ultimately, what the settlement audit demonstrates is that each town is sustainable on its own; or, in the words of PPG: “the housing audit scores should not be the exclusive tool for attributing development, particularly given that scores are largely similar between all seven towns with each scoring very similarly.”

Tests of Soundness:

Policy: Policy 3: Level & Distribution of Growth

Positively prepared
Effective
Justified
Consistent with national

Comment: Full representations are made against Policy 3, note the approach to assessing the test of soundness.
Table 5 on P44 confirms that the intention is to use the bottom range figure (LHN). HLM/HBD objects to this position. It will suppress the effectiveness of the strategy of seeking to achieve levels of growth aligned with the Sheffield City Region and remove a barometer of performance in delivering housing in line with a job led strategy. It is acknowledged that the PPG contains advice stating "Where strategic policy-makers have successfully argued through plan-making and examination for a requirement set out as a range, the 5 year land supply will be measured against the lower end of the range." Whilst on face value the Doncaster approach accords with the principles of this guidance, the range difference between the levels of development are so significant, whether this be 585 vs 920; 585 vs 1073 or 585 vs a higher figure; that adopting 585 as the annual requirement would fatally undermine the objectives of significantly boosting housing supply to aid the job-led scenario. The Council’s 5 Year Housing Land Supply Statement projects a supply of 12.88 years based on the standard methodology being used to calculate requirement. At this stage HLM/HBD does not make any detailed assessment of the supply as the figures could change significantly but would make the following observations; (1) It is our view that given the differences between the range, the top level figure should be adopted as a the requirement for the reasons explained above. (2) The start of the assessment period should be April 2019, as by the time the Plan is at examination, it is likely that the five year period will already be two years old. (3) The information on supply is fragmented with some contained in the Housing Land Supply Statement and other information in the Plan itself, but further separated by settlements over numerous pages (4) The level of evidence to support the assumptions is in many cases insufficient to meet the tests of 'deliverable'.

**Proposed Change**

To remedy the issues raised in respect of Policy 3 we suggest the following: - The housing requirement should take account of growth over the entire Plan period and not just 10 years. This will increase the requirement significantly and additional allocations will be necessary. We set out the case for land promoted by HLM/HBD for housing under our recommendations for Policy 6. - The current distribution between main town settlements is unjustified. This should be more based on sustainability credentials rather than a division based on pro rata increase in household numbers. A more even spread of housing requirement across the main towns is likely. This does not necessarily equate to even allocation of numbers and factors such as Green Belt, flood risk and other constraints continue to be factors in decisions on the location of development. - The baseline housing requirement for five year supply should not be the standard methodology figure but the revised annualised requirement figure that takes account of growth for the whole of the plan period.

**Summary:**

Object to Policy 3. Number of issues mean it fails the test of soundness. Recognise that Doncaster is planning above the standard methodology and has applied a jobs led uplift. This is supported in principle. However, the 912dpa does not take into account the growth strategy for the whole of the plan period, as set out in para. 4.29 in the PBA report, which advises the requirement 1,073 dpa is needed over the plan period. Whilst this report sets this in the context of the previous NPPF, but there is nothing in the latest PPG to suggest that the calculation of other scenarios, such as the growth led strategy, has to align with the initial ten year period used for calculation the base requirement. Economic growth and housing need will continue beyond the ten year period. The job factor should logically be applied for the duration of the plan period. 1,073 better aligns with housing delivery records over the past couple of years. Delivery in the first 3 years is 3,400 homes, or 1,133 dpa. The report also covers 2015 - 32, but there are now 3 additional years (32 - 35) that should be factored in. 920dpa is therefore too low and not sufficiently aligned with the growth strategy. The market has shown it can deliver a higher requirement. The proposed requirement fails the ‘justified’ test of the NPPF (para. 35) as it is not an appropriate strategy. The requirement is not positively prepared as having taken the decision to increase requirement beyond the base level, the Council has not employed a clear and justified method in reaching an alternative target.

**Distribution and range of the Main Towns:**

No objections to the broad distribution between settlement categories. However, the Main Towns is based on household split percentages, which is in contrast to the Core Strategy in which the principal towns were all attributed the same range of dwellings. Do not disagree that different settlements should have different ranges, but this should be based on sustainability, not a pro - rata distribution exercise. Consequently, Adwick - Woodlands has the lowest range of the Main Towns, despite scoring higher than three other Main Town settlements within the Settlemens Profiles. It is recognised this shouldn’t be an exclusive tool for attributing development as the scores are largely similar, however for example, Armthorpe has no train station but a higher requirement. The Settlement Audit ultimately shows that each town is sustainable but the distribution does not appear justified against the sustainability criteria and more on existing size. Policy 3 therefore fails the justified test as it is not an appropriate strategy based on the evidence. 5 years supply: Object to the use of the standard methodology figure for 5 year supply purposes. It will suppress the effectiveness of the strategy of seeking to achieve levels of growth aligned with SCR. and remove the barometer of performance in delivering housing in line with a job led strategy. It is acknowledged that PPG states that "Where strategic policy-makers have successfully argued through plan-making and examination for a requirement set out as a range, the 5 year land supply will be measured against the lower end of the range." On face value the approach accords with the principals of the guidance, however the ranges from 585 - 920 or 1,073, or a higher figure is so significant that adopting 585 as the annual requirement would fatally undermine the objectives of significantly boosting housing

**Response:**

The council is planning for 920dpa, which is 57% higher than the Standard Methodology figure. Although the 2015 HNA and 2018 PBA report result in the same figure, they were arrived at independently of each other and via different methods. The Peter Brett’s work supersedes the housing requirement of the HNA, and the 2019 Housing Needs Assessment replaces other elements of this work. It is unnecessary to further update the Peter Brett Report, but the extended plan period has been factored in to housing calculations. The report clearly states the figure of 1,073 is related to the previous NPPF and not the revised NPPF, and 912dpa is correct as per the new NPPF (para. 5.27 & 5.28). These paragraphs also explain the Council could choose an intermediate number between 585 and 912, which the Council has elected not to do, in favour of retaining the higher figure. The NPPF instructs Council’s to use the Standard Methodology Figure (para. 60) to work out the minimum requirement. The Council has done this. Using a range is covered in Planning Practice Guidance (Housing Supply and Delivery - Paragraph: 027 Reference ID: 68-027-20190722). The additional 3 years have been factored in and housing supply can be demonstrated for these years. The Core Strategy has been replaced by the new Local Plan strategy, and the approach is set out in the Housing Topic Paper.
Summary of Policy 3 Level and Distribution of Growth 4.39 The Policy sets out the strategic aim to deliver at least 481 hectares of employment land over the plan period (2015-2035) to help grow and diversify the economy, increase productivity and widen access to learning and training opportunities. 4.40 In addition the policy seeks to deliver 18,400 new homes with land allocated for a 15 year supply of housing. 4.41 The policy sets out the distribution of growth in a number of tables relating to the settlement hierarchy. At least 50% of the total Housing is to be delivered in the main urban area. In terms of employment sites, logistic and light industry and manufacturing are directed to locations with good access to the M18 ad M180 motorways and strategic road network. 4.42 The Main Towns are identified to deliver 40% of housing growth. Employment is directed towards the same areas as the main urban area, M18/M180. 4.43 The Service Towns and Larger Villages which includes Edlington are identified to deliver 10% of the total housing growth for the Borough. New logistics employment is directed to the main urban area, ie the M18/M180 and Airport locations. Light Industry and Manufacturing is directed to the A1(M) - A19 corridor. Employment 4.44 Paragraphs 4.25 to 4.35 of the Plan provide an explanation of the policy in relation to Employment. The plan sets a land requirement of 481 hectares which factors in a 1% jobs growth rate. Whilst ambitious, the policy states the requirement and growth is based on evidence in the Employment Land Review and Employment Land Need Assessment and will boost productivity for existing and new sectors to grow by providing choice, flexibility and churn. 4.45 Paragraph 4.27 states that the distribution of employment areas is required in locations that are both attractive to the market and in locations where there is strong accessibility and connectivity with where people live. 4.46 The main location for large scale investment and growth is Doncaster Sheffield Airport and the iport is justified in paragraph 4.28 which states that many people do not with to live close to where they work and businesses often have locational needs meaning that they need to be located away from settlements. It continues to state that employment sites immediately next to residential areas can often lead to amenity issues. 4.47 The Plan states that existing established employment locations reflect previous development patterns but that these are often poorly located for modern business and have come under pressure for housing and other commercial uses. 4.48 Paragraph 4.33 continues to state that in the west of the Borough, areas such as Mexborough and Conisbrough are constrained by a lack of sites and that any existing sites have been under pressure for other uses. It is noted that the only site allocation in the west of the Borough is site 743 at Broomhouse Lane Industrial Estate which is a small site (0.75ha) with planning permission for B2 use. Housing 4.49 In terms of housing, this is directed to the main urban area in accordance with the Plans Settlement hierarchy with the main towns, including Mexborough and Conisbrough receiving about 40% of the total housing figure. The table in the policy states that Conisbrough and Denaby should provide approximately 465-975 new homes, Mexborough has a target to provide between 475-985 new homes. 4.50 This provision meets baseline growth and up to 10% of economic housing growth. The economic element of housing growth is directed to the most sustainable and deliverable sites in the main urban area and main towns 4.51 It is relevant to note that in Mexborough the allocated sites fall short of the lower end of the target by 165 dwellings. This is therefore directed to other main towns and urban areas. However, three reserve sites are identified which are likely to be progressed for housing during the plan period subject to the progress of HS2. 4.52 At Conisbrough and Denaby, the target is 465-975 with an allocated supply of 528 dwellings. A reserve site with the potential to provide 325 dwellings is identified. 4.53 The ten service towns and villages are identified to provide about 10% of the Boroughs total housing. The policy sets a target of 230 new homes to be provided in Edlington. 4.54 However, the settlement profile (para 16.206) states that the supply of housing provided through allocations with and without permission far exceeds the plan period requirement. The allocations provide for 665 new dwellings in Edlington. Soundness of Policy 3 to deliver the level and distribution of growth. 4.55 Whilst we generally support the thrust of the policies towards strategic sites to deliver growth and support the distribution, we object to the lack of new employment allocations in the west of the borough in preference for new employment allocations to the south and east. 4.56 It is considered that the Policy is unsound and is not justified and is not the most appropriate strategy when assessed against the reasonable alternatives. Reasoning 4.57 The Spatial Strategy and settlement Hierarchy seek to deliver sustainable growth that is appropriate to the size of individual settlements to meet the needs for new homes and jobs and to help to maintain strong sustainable communities, a strategy which we support. 4.58 Policy 3 which distributes growth in the borough conflicts with this strategy. The lack of new employment allocations in the west of the borough fails to recognise the existing functions within the communities in the west of the borough which include a number of existing employment locations/sites. 4.59 The settlements of Mexborough, Conisbrough, Denaby and Edlington (the west of the Borough) provide 5 identified existing employment sites. These sites provide some of the boroughs largest employers, including Polypipe at Edlington. 4.60 Paragraph 2.22 of the Plan, Policy 2, paragraph 4.27 all refer to the importance of communities and accessibility to the local employment opportunities which reflects the relatively self contained economy with approximately 80% of workers travelling to work in the Borough and a fifth travelling to work in the same electoral ward in which they live. 4.61 The vision of the Plan seeks to help encourage existing business to expand as well as attracting new businesses to the Borough. 4.62 The plan recognises current live/ work patterns and the importance of existing businesses. There is a conflict between the Plans strategy which seeks to create and maintain strong, sustainable, cohesive and inclusive communities and Policy 3, the distribution of the employment sites which fails to maintain existing communities by failing to provide sufficient flexibility and choice to existing businesses. 4.63 The lack of any new employment sites (with the exception of a small site 743 at Edlington) clearly conflicts with the evidence and is not justified. 4.64 Whilst the strategic vision for employment growth on the M1/M18 corridor and Doncaster Sheffield Airport, together with infrastructure improvements is understood and supported, there is clearly a need to support existing businesses and residents, particularly those in the west of the borough
The rep summarises and discusses policy 3. The only site allocation in the west of the Borough is site 743 at Broomhouse Lane Industrial Estate, which is a small site (0.75ha) with planning permission for B2 use. Generally support the thrust of the policies towards strategic sites to deliver growth and support the distribution of employment. Object to the lack of new employment allocations in the west of the borough in preference for new employment allocations to the south and east. The Policy is unsound and is not justified and is not the most appropriate strategy when assessed against the reasonable alternatives. Proposed changes to the plan to make it Sound additional new employment allocations and extensions to existing employment sites in the west of the Borough should be delivered. This will ensure that sustainable new communities are created in the west of the borough through the delivery and growth of new homes and opportunities for existing businesses to grow and remain in the area. Additional new employment site allocations are required in Edlington, Mexborough, Conisbrough and Denaby. These representations are written with specific regard to and support for an expansion to Broomhouse Lane Industrial Estate, Edlington to enable the existing occupier Polypipe to expand so that they are able to continue to operate efficiently from their location. Section 5 of this report provides details of the two proposed expansion sites.

Summary:
The rep summarises and discusses policy 3. The only site allocation in the west of the Borough is site 743 at Broomhouse Lane Industrial Estate, which is a small site (0.75ha) with planning permission for B2 use. Generally support the thrust of the policies towards strategic sites to deliver growth and support the distribution of employment. Object to the lack of new employment allocations in the west of the Borough in preference for new employment allocations to the south and east. The Policy is unsound and is not justified and is not the most appropriate strategy when assessed against the reasonable alternatives. Proposed changes to the plan to make it Sound additional new employment allocations and extensions to existing employment sites in the west of the Borough should be delivered. This will ensure that sustainable new communities are created in the west of the borough through the delivery and growth of new homes and opportunities for existing businesses to grow and remain in the area. Additional new employment site allocations are required in Edlington, Mexborough, Conisbrough and Denaby. The representation are written with specific regard to and support for an expansion to Broomhouse Lane Industrial Estate.

Response:
Noted. Support welcomed. The Green Belt Topic Paper explains why there are no employment allocations within the Green Belt at this time i.e. it is considered that there are currently no exceptional circumstances. The explanatory text of Local Plan Policy 3 also explains that there is access to business parks across the border in Rotherham. These can be accessed using strong public transport links and road connectivity.
Alignment with Economic Growth 3.12. Draft Policy 3 sets out the amount of housing to be developed over the plan period. The new Local Plan suggests a housing figure of 18,400 new homes over the plan period 2015-2035 (920 per annum). DMBC correctly use the Government’s Standard Housing Methodology as a starting point and then considers the impact of economic growth to come to a more realistic housing need figure. 3.13. However, it should be emphasised that Doncaster is well situated with key spatial links to the motorways (A1(m) and M18), close to Humber Ports, Sheffield and Leeds and as such provides a fundamental opportunity to deliver job growth to support the ‘Northern Powerhouse’. 3.14. Its position is crystallised within the Sheffield City Region Strategic Economic Plan (2015-2025). The plan sets out an ambitious growth strategy for the City Region in the context of duty to cooperate. James Newman, Sheffield City Region LEP Chairman has stated: "Our Strategic Economic Plan is a ten-year strategy to grow the Sheffield City Region’s economy. It is based on creating more private sector jobs by ensuring our businesses are encouraged and incentivised to grow. Our ambitions to deliver 70,000 net additional jobs, increase GVA by 10% or # billion and create 6,000 new businesses will enable its transformation” (Our emphasis) 3.15. This is accompanied by a #10 million transport fund overseen by the Transforming Cities Fund in the context of improved travel and to help facilitate the ambitious Doncaster Sheffield Airport expansion plan. In respect of Doncaster, page 16 (figure 4) sets out Doncaster’s role as: “A high quality urban centre, attractive retail opportunities and excellent rail links that contribute to its multimodal logistics and advanced engineering offer.” 3.16. MHCLG are explicit that if councils want a more ambitious local plan for growth then they should incorporate positive growth and housing figures (PPG 02a-010). DMBC by their own admission state they have “ambitious plans and ideas for the future of the borough”. 3.17. In reviewing the evidence for the housing need, this is set out as part of the Standardised Methodology (2014 ONS projections) and the Economic Forecasts and Housing Needs Assessment (2018). This provides a range of the Standardised Methodology targets whilst also setting an upper threshold of 920 dwellings per annum. 3.18. At paragraph 5.21 it states how a job-led housing need to match the job growth aspiration of the SCR would be 1,073 dpa. Written a year later, the Employment Land Need Assessment (2019 update) states at paragraph 1.6 how it is aware of the SCR Growth Plan and Northern Powerhouse implications but again this is only applied to calculating employment land targets. It states at paragraph 6.26 that: "The 'Job Led' scenario has been selected for the Local Plan which is considered ambitious but realistic." It follows that if the employment needs are 'policy on' housing growth should be 'policy on' otherwise the strategy fails. 3.19. In adopting a pure Standardised Methodology approach this is overly simplistic. If continued, there is a fundamental danger that the Local Plan will be found unsound by the Inspector and DMBC asked to revise its housing targets upwards accordingly. 3.20. This issue has recently been raised at the Calderdale Local Plan Examination. A copy of the Inspector’s post-hearing letter is included at Appendix 3. Whilst submitted under transitional arrangements the provisions of more recent policy apply. Within this it references the NPPF paragraph 60 which confirms the approach to using the Standardised Methodology: "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." (Our emphasis) (SEE EMAIL FOR Appendices) 3.21. Planning Policy Guidance provides further guidance on this interpretation, stating: "The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth?. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates…Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: - growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals); - strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or - an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;" 3.22. The Inspector then discusses the areas of inconsistency in turn. These being: - The commitment to a major (Leeds) City Region Economic Growth deal, having knock on 'policy on' implications for growth and employment land distribution; - The Employment land distribution which at 73 Ha is ‘policy on’, requiring commensurate housing growth to support and house the increase in jobs, prosperity and inward investment; and, - As a result the need to increase the growth by c. 20% over and above the standard method derived housing target of 820 dpa. 3.23. All of the above points apply to DMBC. Doncaster is clearly committed to the Sheffield City Region Growth Strategy and from it similar key 'policy on' implications should flow in respect of housing growth. 3.24. A higher housing figure is also crucial in meeting the other aims and objectives of the framework. This will ensure that Doncaster remains an attractive location of choice for those wanting to live and work in the region and will encourage economic growth by being able to accommodate the influx of people and ensure the vitality of the urban area. In particular, it will allow regeneration and sustainability objectives to be met. Standard Method 3.25. Further, it must be highlighted that Standard Method is still subject to review and likely to be revised in the next 12 months and should therefore not be relied upon without testing. 3.26. In conjunction the 2018 consultation document for the government’s proposed approach states in the short term the 2014-based data should provide the demographic baseline rather than the 2016 version due to significant drops in housing need. It therefore highlights that this is still a new method and still not finalised, with new calculations expected for release later on in 2019. Yet in taking the 2014 based figures the current standardised methodology is not perfect. 3.27. Taken nationally it delivers 265,936 homes per annum, a clear shortfall on the 300,000 homes per annum widely asserted by MHCLG and on the 7th February 2019 the National Audit Commission published its report.
on housing in the UK, writing: "The Department understands the shortfalls in the planning system and its new planning policy framework aims to address some of these, such as the system for contributions from developers. However, it is too early to say how effective the new framework and proposed reforms will be in bringing about the level of change needed. The Department and government more widely need to take this much more seriously and bring about improvement if they are to meet their ambition of 300,000 new homes per year by the mid-2020s."

(Our emphasis) Recommendation 3: Ensure that a positive growth strategy is incorporated into the LHN to ensure consistency with DMBC's economic aims and objectives and Sheffield City Region Growth Strategy. In order to achieve this DMBC should adopt a housing target of at least 1,073 dwellings per annum in the interests of positive, consistent and effective plan making. The Shortfall position 3.28. Further, the 920 dwellings per annum figure does not reflect on the consequences of past under delivery of housing. This is set out below: Doncaster Net Additional Dwellings (NAD) 2010-11: 817 2011-12: 457 2012-13: 316 2013-14P: 654 2014-15: 792 2015-16: 1162 2016-17: 1049 2017-18: 1208

Table 1 - Net Additional Dwellings (Source: ONS, 2019). 3.29. Setting this against the 2012 Core Strategy OAN of 1,230 per annum, there is a danger that DMBC would be accused of 'resetting' the shortfall in supply at Examination if the 3,195 unit shortfall from 2011 to 2018 is not accounted for within the new housing need figure. It is essential that this figure is added onto the Economic Forecasts and Housing Needs Assessment target of 1,073 dwellings per annum to give a new minimum target of 1,233 dwellings per annum (Liverpool method) or 1,712 dwellings per annum for years 0-5 if it is to be made up over the first five years of the plan period (Sedgefield Method). Recommendation 4: Ensure that the shortfall of 3,195 units from the previous plan period is accounted for within the new housing target. In the interests of justified and effective plan making.

Focus on Growth within the Main Urban Area 3.30. In conjunction with the settlement hierarchy outlined in Draft Policy 2, Draft Policy 3 goes on to state the specific distribution of development. With specific consideration to the Main Urban Area of Doncaster, it states at least 50% of the Borough’s total housing should be focused within it. We must reiterate that the policy clearly states 50% as a minimum figure and even when this figure is met the council should still look to support housing in the Main Urban Area. 3.31. Further, given the unique characteristics of DMBC Doncaster is by far the dominant settlement and largest in this part of the SCR with a population of 302,402 (2011 Census) - the next largest settlement being Thorne at 17,295 (2011 Census) with the remainder involving a number of smaller dispersed settlements beyond. It can even be argued that sustainable growth could be more focussed on the town, recognising the key characteristics of the district. For example, in the region of 60-70%. This would allow development where possible to be located within sustainable locations and in line with the aims of the NPPF. To this end we believe the minimum target for the MUA should be 17,262 ((1,233x20)x70%) dwellings over the plan period. 3.32. Given this reason we would like to recap the merits of the Grange Farm site in that the site is located adjoining the Main Urban Area of Doncaster, directly south of Edenthorpe. As such would represent a Sustainable Urban Extension and support its role. Recommendation 5: DMBC should heighten the role of Doncaster within its growth distribution, planning for at least 17,262 dwellings over the plan period within or adjacent to the Main Urban Area in line with Recommendations 3 and 4 and in the interests of effective, justified and positive planning.

Summary:
Doncaster is well located in relation to the motorway, ports and Sheffield / Leeds. It provides a fundamental opportunity to deliver jobs to support the northern powerhouse, and the airport has ambitions to expand. DMBC state they have ambitious plans for the future of the borough. Para. 5.21 of the PBA report states that job led housing to match job growth aspirations for the SCR would be 1,073dpa. The ELNA states that a job led scenario has been selected for the local plan, and it follows that if employment is policy on, housing should also be. Adopting a pure standardised methodology approach is overly simplistic, if continued there is a fundamental danger the plan will be found unsound and the Council have to revise its figure upwards. This is covered in the NPPF (para. 60) and PPG. The issue has currently been raised at Calderdale Local Plan examination, where the inspector decided there should be an increase of 20% above the standard method figure of 820 dpa given the local economic ambitions. The same argument applies to Doncaster and it’s commitment to the SCR growth strategy. From this, similar policy on implications should flow in respect of housing growth. A higher figure is also crucial in meeting other framework objectives, ensuring Doncaster is an attractive location of choice and to encourage economic growth by being able to accommodate the influx of people and support urban vitality - as well as allowing regeneration and sustainability objectives to be met. The Standard Method is still subject to review and likely to be revised in the next 12 months and therefore should not be relied upon without further testing. It uses 2014 based figures so is not perfect, and new calculations are expected. Nationally, it results in a shortfall against the government targets of 300,000 new homes by the mid 2020s.

Recommendation 3: to ensure a positive growth strategy, DMBC should adopt a target of 1,073 dpa in the interests of positive, consistent and effective plan making. 920 dpa does not reflect under delivery against the Core Strategy target in the years 2010 - 2018 of 3,195 units. This should be added to 1,073 to create a shortfall of 1,233 dpa (Liverpool method), or 1,712 dpa 0 - 5 if being made up over the first 5 years (Sedgefield method). Recommendation 4 - ensure that 3,195 unit shortfall from previous plan period is accounted for within the housing target, in the interests of justified and effective plan making. Furthermore, 50% of the housing requirement should be delivered in the Main Urban Area, as per policy 3. However, this is the most sustainable location (302,402 residents in the 2011 census, Thorne next with 17, 295 and the rest in dispersed settlements beyond). It could be argued sustainable growth could be more focused on the town, e.g. in the region of 60 - 70%, allowing all development to be in sustainable locations. The target for the MUA should be 17,262 ((1,233x20)x70%). Grange Farm would represent a sustainable urban extension and support the role of the MUA. Recommendation 5: the role of the urban area should be heightened and 17,262 dwellings planned for over the plan period in or adjacent to it.

Response:
The Council has used the Standard Methodology figure of 585 and then increased its housing requirement to 920 dpa, as set out in the Economic Forecasts and Housing Needs Assessment (Peter Brett Associates, May 2018). This is a substantial increase which demonstrates positive, effective planning. No change needed.
C/Policy 3/05289/1/003

Chapter 4: Strategic Approach

Policy 3: Level & Distribution of Growth

**Tests of Soundness:**

- Positively prepared
- Consistent with national
- Justified

**Comment:**

Policy 3 is not considered to be sound as it is not positively prepared, justified or consistent with national policy for the following reasons: The Council has continued to identify a net housing requirement of 920 dwellings per annum (dpa) over the plan period 2015-2035. Paragraph 60 of the NPPF 2019 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 demographic trends and market signals’. It should be noted that the Standard Method identifies a minimum annual housing need figure, it does not produce a housing requirement figure. It should also be noted that 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. The National Planning Practice Guidance (NPPG) (ID: 2a-010) goes on to states 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 of the Standard Method. The Peter Brett Economic Forecasts and Housing Needs Assessment (2018) identifies a demographic starting point from the 2014-based household projections of 562dpa, which 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 pf 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. The Peter Brett Economic Forecasts and Housing Needs Assessment (2018) identifies a demographic starting point from the 2014-based household projections of 562dpa, which 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 pf 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. Lastly, the housing requirement should not be treated as a cap because this would be inconsistent with the NPPF’s requirement to support the Government’s objective to boost the supply of homes. It is important that sufficient housing is allocated to match the proposed level of economic growth, in order to provide sufficient homes for the labour force required to service the jobs created. Not providing a sufficient number of homes to match the economic growth aspirations in the Borough can lead to consequences, such as the formation of unsustainable commuting patterns due to an insufficient number of homes for people wishing to move to Doncaster. The NPPF is clear in paragraph 9 that policies should play an active role in guiding development towards sustainable solutions and in doing so should take local circumstances into account. It DMBC wish to encourage economic growth within the Borough this should be done in a sustainable manner.

**Summary:**

The Standard Method identifies a minimum annual housing need figure, it does not produce a housing requirement figure. The Peter Brett Economic Forecasts and Housing Needs Assessment (2018) identifies a demographic starting point from the 2014-based household projections of 562dpa, which 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 pf 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. It is important that sufficient housing is allocated to match the proposed level of economic growth, in order to provide sufficient homes for the labour force required to service the jobs created. Not providing a sufficient number of homes to match the economic growth aspirations in the Borough can lead to consequences, such as the formation of unsustainable commuting patterns due to an insufficient number of homes for people wishing to move to Doncaster.

**Response:**

As demonstrated in the Housing Topic Paper, the Local Plan is proposing an appropriate housing requirement that will meet the needs of Doncaster and its aspirations for growth.
We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Tests of Soundness: Positively prepared  Justified  Consistent with national

Policy: Policy 3: Level & Distribution of Growth

Comment:
Policy 3 is not considered to be sound as it is not positively prepared, justified or consistent with national policy for the following reasons: The Council has continued to identify a net housing requirement of 920 dwellings per annum (dpa) over the plan period 2015-2035. Paragraph 60 of the NPPF 2019 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 demographic trends and market signals’. It should be noted that the Standard Method identifies a minimum annual housing need figure, it does not produce a housing requirement figure. It should also be noted that 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. The National Planning Practice Guidance (NPPG) (ID: 2a-010) goes on to states 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 of the Standard Method. The Peter Brett Economic Forecasts and Housing Needs Assessment (2018) identifies a demographic starting point from the 2014-based household projections of 562dpa, which 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. The Council identify that the housing requirement will be expressed as a range with the bottom of the range being the Local Housing Need (LHN) figure and the top of the range being the 920dpa. As set out above it is not considered that the LHN produced from the Standard Method would provide an appropriate housing requirement. With the Sheffield City Region jobs growth aspirations applied a housing need of 1,073dpa is identified. It is clear that there are circumstances identified that would require a housing requirement figure which is significantly greater than the outcome of the Standard Method. Lastly, the housing requirement should not be treated as a cap because this would be inconsistent with the NPPF’s requirement to support the Government’s objective to boost the supply of homes. It is important that sufficient housing is allocated to match the proposed level of economic growth, in order to provide sufficient homes for the labour force required to service the jobs created. Not providing a sufficient number of homes to match the economic growth aspirations in the Borough can lead to consequences, such as the formation of unsustainable commuting patterns due to an insufficient number of homes for people wishing to move to Doncaster. The NPPF is clear in paragraph 9 that policies should play an active role in guiding development towards sustainable solutions and in doing so should take local circumstances into account. DMBC wish to encourage economic growth within the Borough this should be done in a sustainable manner.

Response:
As demonstrated in the Housing Topic Paper, the Local Plan is proposing an appropriate housing requirement that will meet the needs of Doncaster and its aspirations for growth.
Policy 3 identifies the need to deliver 18,400 new homes in the period 2015 to 2035 (920 per annum), with sufficient land allocated to deliver 15 years’ supply of housing (13,230, or 882 dpa once supply in the years 2015 to 2018 is deducted from the overall requirement). Policy 3 then goes on to state that the housing requirement is expressed as a range with the bottom of the range being the Local Housing Need figure and the top of the range being 920 dpa. Policy 3 does not however state what the Local Housing Need figure, which is identified within the ‘Economic Forecasts and Housing Needs Assessment’ (June 2018) (prepared by PBA) as 585 dpa. Therefore the implication of this is that the housing requirement for Doncaster supports the delivery of between 585 and 920 dpa over the plan period. Swan Homes Ltd consider that this is a significant change since the Draft Plan for informal consultation. Policy 3 has shifted from stating that the 920 dpa is a minimum figure (‘at least’), to stating that the housing requirement is a range from the Local Housing Need (585 dpa) to 920 dpa. Swan Homes Ltd does not feel that this policy is sound as it does not support a positively prepared plan which is supportive of boosting significantly the supply of housing. We consider it important that the wording in Policy 3 should state that the 920 dpa is a minimum and reflect the wording in the Draft Plan for informal consultation where the 920 dpa was stated as ‘at least 920 dpa’. We also consider that Policy 3 should make it clear that the number of homes per annum is a net figure, again this is a change since the Draft Plan for informal consultation which explicitly stated that the 920 dpa were net homes required to be delivered over the plan period. We would also suggest that the numerical value of the Local Housing Need for Doncaster (585 dpa) should be explicitly stated in Policy 3. The 920 dpa identified in Policy 3 is not evidenced within the PBA report and it is unclear upon which evidence the 920 dpa figure is based. The PBA report suggests that in order to support the jobs-led scenario which supports the economic ambition of Doncaster and the Sheffield City Region over the plan period, 1,073 dpa would be required. This level of future housing need to support the jobs-led scenario over the plan period and is more aligned with housing delivery in recent years. The Doncaster Residential Land Availability Report 2018 shows average net completions over the last 3 years of 1,070. It is anticipated that this could rise when the net delivery figures for 2018/19 are published. Table 1 Doncaster Past Net Housing Delivery Year: 2015/16 Net housing delivery: 1,025 Year: 2016/17 Net housing delivery: 1,049 Year: 2017/18 Net housing delivery: 1,137 Year: 2018/19 Net housing delivery: 1,327 * Source: Residential Land Availability 2017/18 *number to be confirmed but current Council estimate based on methodology used in RLA The PPG at paragraph ID :2a-010 is clear that the government remains committed to ensuring more homes are built and support authorities who want to plan for additional growth and as such the standard method is a minimum starting point in determining the number of homes needed in an area. The PPG goes on to identify the circumstances where it may be appropriate to consider whether actual housing need is higher than the standard method. These include where; - Growth strategies are in place such as Housing Deals; - Strategic infrastructure improvements are identified; and - Previous levels of housing delivery are significantly greater than the standard method. The PPG is clear that in these situations authorities will need to take this into account when identifying future needs. Doncaster’s Publication Local Plan does identify a housing requirement as a range, of which the upper end is above the standard method, trends in past delivery and the aspiration to support an economic led future for Doncaster suggest that in order to plan positively for the future it would be more appropriate for the housing requirement in Doncaster to be set at the 1,073 dpa to ensure that the vision can be achieved. Accordingly, Swan Homes Ltd considers that there is a need to increase the housing requirement identified in Policy 3 to state at least 1,073 dpa, in line with the Council’s own evidence, if the vision for the plan is to be achieved.

Summary:

Policy 3 - Level and Distribution of Growth. 1. The range figure for housing is not sound. 2. 920 dpa should be a minimum. 3. Policy should say ‘at least 920 dpa’. 4. Should be made clear that this is a net figure. 5. Lower figure of range (585) should be stated in the policy. 6. Evidence for the 930 figure is not clear. It is not in the Peter Brett Report. 7. Housing figure should be 1073 in line with Sheffield City Region ambitions.

Response:

The Local Plan sets out a supply of housing that far exceeds the 18,400 new homes so it is clear that this is already an ‘at least’ figure and the explanatory text (as well as all the supporting evidence base in respect to how sites have been allocated etc) are clear that this is a net figure already. The Local Housing Need figure as derived via the Standard Methodology changes on an annual basis in line with new population projections and affordability ratios so the figure will date very quickly if included in the plan. The 1,073 requirement figure is taken from the PBA Report, but is based on the 2012 NPPF so the 920 figure (or 912 as per the PBA Report) is an appropriate requirement and is a significant uplift to the standard methodology. More details are set out in the PBA Report under the section Housing Numbers Under the New Planning System as well as the supporting Housing Strategy Background Paper which was published alongside the Publication stage. Current completion figures are a result of a number of sites that have been in the pipeline that are now on stream and delivering but caution should be taken when making assumptions that this can/ will continue throughout the rest of the plan period. A high allocation will of course require more sites that will, by default, be either GB/FRZ/other environmentally sensitive sites.
Comment: 2.1 This section refers to relevant strategic policies in the Publication Draft Plan, notably Policy 2: Spatial Strategy and Settlement Hierarchy and Policy 3: Level and Distribution of Growth. 2.7 We note the requirement set out in Policy 3 to deliver at least 481 hectares of employment land within Doncaster over the plan period (2015-2035) to help grow and diversify the Sheffield City Region economy, and do not seek to comment on this requirement. 2.8 The approach set out within the policy, which seeks to distribute growth to the Main Towns, including Thorne and Moorends, alongside the Doncaster main urban area is supported, as is the approach to focusing logistics, light industry and manufacturing in locations that can accommodate large buildings with good access to the M18/M180 motorways and strategic road network. These are the areas where commercial advice, including that set out within the accompanying Delivery Statement, confirms that market demand lies. 2.9 In common with the comments made on Policy 2, Site 001: Thorne North constitutes such a location, providing a large scale site which can accommodate buildings of significant footprints in close proximity to the local population of Thorne and Moorends and with excellent access to the motorway network, and again demonstrates that the strategic approach set out within Policy 3 is justified and capable of being delivered. 2.10 The policy is therefore considered to be positively prepared, justified and effective, and is therefore sound.

Summary:
Policy 2: Spatial Strategy and Settlement Hierarchy and Policy 3: Level and Distribution of Growth. Note the requirement in Policy 3 to deliver at least 481 ha of employment land to help grow and diversify the Sheffield City Region economy. Support the Policy approach to distribute growth to the Main Towns, including Thorne and Moorends as well as the Main Urban Area. The approach to focusing logistics, light industry and manufacturing in locations that can accommodate large buildings with good access to the motorways is also supported. These are the areas where the Delivery Statement confirms there is market demand.

Response:
Noted. Support welcomed.
| CUSREF: | 05294 | Name: | Lichfields |
| Date: | 30/09/2019 | Organisation: | Lichfields |
| Representing: | Don Parkinson Partnership |

**Comment Ref:** C/Housing Req: FiveYearSup/05294/1/005

**Attend Examination:** Attend Hearing

**Reason:** To fully represent our clients land interest and respond to matters that may be raised at the hearing sessions. Please refer to accompanying representation 'Doncaster Local Plan Representations to Draft Doncaster Local Plan - Publication Draft' (September 2019) on behalf of Don Parkinson Partnership (doc ref. 60752/01/JG/AK).

**Area:** Chapter 4: Strategic Approach

**Policy:** Policy 3: Level & Distribution of Growth

**Tests of Soundness:**

| Summary: | 3.9 Draft Policy 3 states that the Council will apply the proposed housing requirement of 920 dpa when considering allocations during the plan period (2015 - 2035), however for the purposes of calculating five year housing land supply the Council will rely on the Standard Methodology figure. It is considered that this approach does not meet national policy and guidance. The PPG (Note 1 - 1 Paragraph: 005 Reference ID: 68-005-20190722) states that: "Housing requirement figures identified in adopted strategic housing policies should be used for calculating the 5 year housing land supply figure where: - the plan was adopted in the last 5 years, or - the strategic housing policies have been reviewed within the last 5 years and found not to need updating. In other circumstances the 5 year housing land supply will be measured against the area’s local housing need calculated using the standard method. 3.10 Therefore, once the local plan is adopted the Council should be applying the housing requirement which was adopted and not the standard methodology. The Council should revisit this policy to ensure it is in compliance with national planning policy (paragraph 73 of the NPPF). |
| Response: | PPG supports the principle of being able to set the requirement as a range. NPPF is clear that Planning decisions should be taken following a plan-led approach. The Council could have just adopted the standard methodology figure as the Local Plan housing requirement in the first instance but have resisted such an approach and instead are planning for a very significant uplift for our ambitions for growth and this is reflected in the scale of allocations proposed. That said, the vast majority of this ambition needs to be delivered by the development industry and the market which may struggle to continue to meet such a high target. The Council has relatively little role to play post Planning decisions being granted in terms of actual housing delivery. Losing control of 5YHLS in this context therefore undermines the key policy objective of having a plan-led approach rather than the presumption that would be applied if 5YHLS cannot be demonstrated. |
Comment:

3.6 Paragraph 11 of the NPPF states that: plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change. This flexibility can be achieved by identifying housing land which exceeds the housing requirement to provide market choice and to act as a buffer should allocations not become available in the time or manner expected, or should circumstances prevent the expected site yields being fulfilled. 3.8 The Plan should therefore seek to allocate land which will meet the minimum requirement and then apply an appropriate buffer on top of this residual requirement. The Council should also be looking to allocate sites across the whole plan period and it is unclear why the Council choose to apply different plan periods when calculating its five year housing land supply and considering allocations to meet its housing need. It is noted that the draft Local Plan currently proposes to allocate sites which will have a combined capacity significantly in excess of the residual requirement of 15,000 dwellings. However, there is scope for this to be further increased to deliver housing within sustainable settlements such as Thorne/Moorends to meet housing needs across a full NPPF-compliant plan period.

Summary:

NPPF Paragraph states that plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change. This flexibility can be achieved by identifying housing land which exceeds the housing requirement to provide market choice and act as a buffer if allocations do not become available. The Council seek to allocate land which will meet the minimum requirement and then apply an appropriate buffer. Sites should be allocated across the whole plan period and it is unclear why different plan periods have been applied when calculating the five year housing land supply and then considering allocations. Although the Plan proposes sites which have a combined capacity in excess of 15,000 dwellings, there is scope for this to be further increased for sustainable settlements such as Thorne and Moorends.

Response:

As the Representation acknowledges, allocations have been made that far exceed the actual housing requirement and there are additional sources of supply identified in addition to this so a buffer is built into the allocations already. A buffer on top therefore would be buffering a supply that has already been buffered. Further detail is provided at Policy 6 and the Site Selection Methodology.
3.1 Draft Policy 3 states that the plan period in which to meet the Council’s aspirations for Doncaster is 2015 - 2035. 3.2 Paragraph 22 of National Planning Policy Framework (NPPF) states that strategic policies should look ahead over a minimum 15 year period from adoption. This is to ensure that the plan responds to long-term requirements and opportunities. It is important that the Council makes robust assumptions within their evidence base in respect of expected adoption of the Local Plan. 3.3 The Council’s latest Local Development Scheme (LDS) (March 2019) states that the plan will not be adopted until Summer 2020. It is considered that the LDS is optimistic in its timeframes from submission of the Local Plan up to adoption. It is unclear if the Council has made an allowance for Main Modifications to be drawn up, consulted on and considered within the estimated examination period. 3.4 From Lichfields’ experience of Local Plan examinations within the Yorkshire area, it is considered that the timeframes within the LDS should be amended, particularly in respect of timeframes between submission and examination. As an example, the Kirklees Local Plan took 6 months from submission to the Secretary of State to the start of the examination, the examination (including main modifications) lasted 12 months, and the Inspector’s report was received three months following the close of the main modifications consultation. These timeframes are considered to be a more realistic indication of the likely time which will be needed at Doncaster and would suggest an estimated date of adoption of September 2021, as shown in Table 3.1. Table 3.1 Estimated timeframe for Local Plan examination Stage: Submission to the Secretary of State DC Estimate: Late Autumn 2019 Lichfields Estimate: November 2019 Stage: Estimated examination period (assumed this period includes Main Modifications) DC Estimate: Winter 2019/20 Lichfields Estimate: May 2020 - May 2021 Stage: Receipt of inspector’s report DC Estimate: Spring 2020 Lichfields Estimate: August 2021 Stage: Estimated date of adoption DC Estimate: Summer 2020 Lichfields Estimate: September 2021 Source: Lichfield Analysis 3.5 It is considered that the plan period should be extended to account for the estimated adoption based on Lichfields timeframes and to ensure that a minimum 15 year time period from adoption is achieved. Based on the Council’s housing requirement (920 dpa) this would result in at least 19,320 dwellings to be delivered during the plan period up to 31st March 2036.

Summary:

NPPF Paragraph 22 states that strategic policies should look ahead over a minimum 15 year period from adoption. It is important that the Council makes robust assumptions within their evidence base in respect of expected adoption of the Local Plan. It is considered that the LDS timescale is optimistic and it is unclear if the Council has made an allowance for Main Modifications to be drawn up, consulted on and considered within the estimated examination period. The LDS should be amended particularly in respect of timeframes between submission and examination. The Kirklees Local Plan took 6 months from submission to the Secretary of State to the start of the examination, the examination (including main modifications) lasted 12 months, and the Inspector’s report was received three months following the close of the main modifications consultation. These timeframes are considered to be a more realistic indication of the likely time which will be needed at Doncaster and would suggest an estimated date of adoption of September 2021, as shown below: Stage: Submission to the Secretary of State Council Estimate: Late Autumn 2019 Lichfields Estimate: November 2019 Stage: Estimated examination period (assumed this period includes Main Modifications) Council Estimate: Winter 2019/20 Lichfields Estimate: May 2020 - May 2021 Stage: Receipt of inspector’s report Council Estimate: Spring 2020 Lichfields Estimate: August 2021 Stage: Estimated date of adoption Council Estimate: Summer 2020 Lichfields Estimate: September 2021. The plan period should be extended to account for the estimated adoption based on Lichfields timeframes and to ensure that a minimum 15 year time period from adoption is achieved. Based on the Council’s housing requirement (920 dpa) this would result in at least 19,320 dwellings to be delivered during the plan period up to 31st March 2036.

Response:

The Local Plan is due to be Submitted early 2020 and plans containing strategic policies have Inspector’s appointed within 1-3 weeks and the subsequent timescales for Hearings and adoption are considered achievable within 2020 meaning there would be 15 years from the date of adoption still i.e. 2035. Notwithstanding this, Policy 6/Chapter 16 identifies a number of allocations that will still be delivering post 2035 given the size of the sites and there is now a statutory requirement to review a Local Plan at least every 5 years anyhow meaning such matters will be looked at several times well before the end of the plan period whether that’s 2035 or a year or two later.
Tests of Soundness: Positively prepared Effective Legally Compliant

Comment:

4.1 Draft Policy 3 as drafted is considered to be unsound and should be amended to state that the Council will seek to deliver a minimum of 18,400 new homes during the plan period in accordance with paragraph 60 of the NPPF. 4.2 It is considered that there is scope to allocate additional housing over and above what is currently proposed, to provide a buffer and ensure delivery throughout the plan period. The Council should look at distributing additional housing sites in accordance with the settlement hierarchy, such as Thorne. From a review of the current distribution of allocations it is considered that the Council should revisit the current strategy and seek to focus further housing to the Main Town settlements rather than Service Towns and Villages as shown on the table below. Table 4.1 Distribution of proposed allocations Settlemet: Doncaster MUA Proposed distribution (Policy 3): 6,805 - 7,315 Proposed Allocation Up to 2035 (Table H1 and H2)**: 7,441 Percentage of Total Allocations (Table H1 and H2): 46% Settlement: Main Towns Proposed distribution (Policy 3): 2,985 - 6,715 Proposed Allocation Up to 2035 (Table H1 and H2)**: 6,292 Percentage of Total Allocations (Table H1 and H2): 39% Settlement: Service Towns and Villages Proposed distribution (Policy 3): 1,360 Proposed Allocation Up to 2035 (Table H1 and H2)**: 2,382 Percentage of Total Allocations (Table H1 and H2): 15% Settlement: Total Proposed distribution (Policy 3): 11,150 - 15,390 Proposed Allocation Up to 2035 (Table H1 and H2)**: 16,115 Percentage of Total Allocations (Table H1 and H2): 100% Source: Lichfields Analysis Excludes delivery beyond plan period* Uses units remaining in respect of Table H1** 4.3 The plan in its current form is neither adequate nor proportionate and fails to take account of local market signals within the Thorne/Moorends settlement. The current strategy should seek to focus further housing to Thorne over and above its current allocation in order to fully meet the proportion of housing distributed to the settlement.

Summary:

Policy 3 is unsound and should be amended to state that the Council will seek to deliver a minimum of 18,400 new homes during the plan period in accordance with paragraph 60 of the NPPF. There is scope to allocate additional housing over and above what is currently proposed so to provide a buffer and ensure delivery throughout the plan period. Additional housing sites should be distributed in accordance with the settlement hierarchy, such as Thorne. The current strategy should seek to focus further housing to the Main Town settlements rather than Service Towns and Villages as shown on the table below. Table 4.1 Distribution of proposed allocations Settlemet: Doncaster MUA Proposed distribution (Policy 3): 6,805 - 7,315 Proposed Allocation Up to 2035 (Table H1 and H2)**: 7,441 Percentage of Total Allocations (Table H1 and H2): 46% Settlement: Main Towns Proposed distribution (Policy 3): 2,985 - 6,715 Proposed Allocation Up to 2035 (Table H1 and H2)**: 6,292 Percentage of Total Allocations (Table H1 and H2): 39% Settlement: Service Towns and Villages Proposed distribution (Policy 3): 1,360 Proposed Allocation Up to 2035 (Table H1 and H2)**: 2,382 Percentage of Total Allocations (Table H1 and H2): 15% Settlement: Total Proposed distribution (Policy 3): 11,150 - 15,390 Proposed Allocation Up to 2035 (Table H1 and H2)**: 16,115 Percentage of Total Allocations (Table H1 and H2): 100% Source: Lichfields Analysis Excludes delivery beyond plan period* Uses units remaining in respect of Table H1** 4.3 The plan in its current form is neither adequate nor proportionate and fails to take account of local market signals within the Thorne/Moorends settlement. The current strategy should seek to focus further housing to Thorne over and above its current allocation in order to fully meet the proportion of housing distributed to the settlement.

Response:

The Local Plan sets out a supply of housing that far exceeds the 18,400 new homes so it is clear that this is already an ‘at least’ figure and there are also many other sources of additional housing land supply in addition to the allocations themselves. There are additional sources of supply identified in addition to this so a buffer is built into the allocations already. A buffer on top therefore would be buffering a supply that has already been buffered. Further detail is provided at Policy 6 and the Site Selection Methodology. The approach to the settlement hierarchy requires consideration of sequential testing so that avoidance of flood risk, where possible, has been taken. The economic growth-led component of the housing requirement is considered as being more footloose and, in accordance with previous Reg 18 consultation, has followed a sequential avoidance of flood risk approach where possible. An allocation to Thorne higher that that identified in the Local Plan and would require land in flood zone 3.
3.9 Draft Policy 3 states that the Council will apply the proposed housing requirement of 920 dpa when considering allocations during the plan period (2015 - 2035), however for the purposes of calculating five year housing land supply the Council will rely on the Standard Methodology figure. It is considered that this approach does not meet national policy and guidance. The PPG (Note 1 - 1 Paragraph: 005 Reference ID: 68-005-20190722) states that: Housing requirement figures identified in adopted strategic housing policies should be used for calculating the 5 year housing land supply figure where: - the plan was adopted in the last 5 years, or - the strategic housing policies have been reviewed within the last 5 years and found not to need updating. In other circumstances the 5 year housing land supply will be measured against the area’s local housing need calculated using the standard method.  3.10 Therefore, once the local plan is adopted the Council should be applying the housing requirement which was adopted and not the standard methodology. The Council should revisit this policy to ensure it is in compliance with national planning policy (paragraph 73 of the NPPF).

Summary:
Local Plan Policy 3 states that the Council will apply the proposed housing requirement of 920 dpa during the plan period, but for the purposes of calculating a five year housing land supply it will rely on the Standard Methodology figure. This approach does not meet national policy and guidance. PPG Note 1 - 1 Paragraph: 005 (Reference ID: 68-005-20190722) states that "Housing requirement figures identified in adopted strategic housing policies should be used for calculating the 5 year housing land supply figure where: - the plan was adopted in the last 5 years, or - the strategic housing policies have been reviewed within the last 5 years and found not to need updating. In other circumstances the 5 year housing land supply will be measured against the area’s local housing need calculated using the standard method." Once the Local Plan is adopted the Council should be applying the housing requirement which was adopted and not the standard methodology. This Policy should be revisited to ensure it is in compliance with national planning policy (paragraph 73 of the NPPF).

Response:
PPG supports the principle of being able to set the requirement as a range. NPPF is clear that Planning decisions should be taken following a plan-led approach. The Council could have just adopted the standard methodology figure as the Local Plan housing requirement in the first instance but have resisted such an approach and instead are planning for a very significant uplift for our ambitions for growth and this is reflected in the scale of allocations proposed. That said, the vast majority of this ambition needs to be delivered by the development industry and the market which may struggle to continue to meet such a high target. The Council has relatively little role to play post Planning decisions being granted in terms of actual housing delivery. Losing control of 5YHLS in this context therefore undermines the key policy objective of having a plan-led approach rather than the presumption that would be applied if 5YHLS cannot be demonstrated.
Comment:

3.6 Paragraph 11 of the NPPF states that: plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change. 3.7 This flexibility can be achieved by identifying land as housing allocations which appropriately exceeds the housing requirement to provide market choice and to act as a buffer should allocations not become available in the time or manner expected, or should circumstances prevent the expected site yields being fulfilled. 3.8 The Plan should therefore seek to allocate land which will meet the minimum requirement and then apply an appropriate buffer on top of this residual requirement. The Council should also be looking to allocate sites across the whole plan period and it is unclear why the Council choose to apply different plan periods when calculating its five year housing land supply and considering allocations to meet its housing need. It is noted that the draft Local Plan currently proposes to allocate sites which will have a combined capacity significantly in excess of the residual requirement of 15,000 dwellings. However, there is scope for this to be further increased to deliver housing within sustainable settlements such as Thorne/Moorends to meet housing needs across a full NPPF-compliant plan period.

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Response:

As the Representation acknowledges, allocations have been made that far exceed the actual housing requirement and there are additional sources of supply identified in addition to this so a buffer is built into the allocations already. A buffer on top therefore would be buffering a supply that has already been buffered. Further detail is provided at Policy 6 and the Site Selection Methodology.
Policy 3 states that the plan period in which to meet the Council’s aspirations for Doncaster is 2015 - 2035. NPPF Paragraph 22 states that strategic policies should look ahead over a minimum 15 year period from adoption. This is to ensure that the plan responds to long-term requirements and opportunities. It is important that the Council makes robust assumptions within their evidence base in respect of expected adoption of the Local Plan. 3.3 The Council’s latest Local Development Scheme (LDS) (March 2019) states that the plan will not be adopted until Summer 2020. It is considered that the LDS is optimistic in its timeframes from submission of the Local Plan up to adoption. It is unclear if the Council has made an allowance for Main Modifications to be drawn up, consulted on and considered within the estimated examination period. 3.4 From Lichfields’ experience of Local Plan examinations within the Yorkshire area, it is considered that the timeframes within the LDS should be amended, particularly in respect of timeframes between submission and examination. As an example, the Kirklees Local Plan took 6 months from submission to the Secretary of State to the start of the examination, the examination (including main modifications) lasted 12 months, and the Inspector’s report was received three months following the close of the main modifications consultation. These timeframes are considered to be a more realistic indication of the likely time which will be needed at Doncaster and would suggest an estimated date of adoption of September 2021, as shown in Table 3.1. Table 3.1 Estimated timeframe for Local Plan examination Stage: Submission to the Secretary of State DC Estimate: Late Autumn 2019 Lichfields Estimate: November 2019 Stage: Estimated examination period (assumed this period includes Main Modifications) DC Estimate: Winter 2019/20 Lichfields Estimate: May 2020 - May 2021 Stage: Receipt of inspector’s report DC Estimate: Spring 2020 Lichfields Estimate: August 2021 Stage: Estimated date of adoption DC Estimate: Summer 2020 Lichfields Estimate: September 2021 Source: Lichfield Analysis 3.5 It is considered that the plan period should be extended to account for the estimated adoption based on Lichfields timeframes and to ensure that a minimum 15 year time period from adoption is achieved. Based on the Council’s housing requirement (920 dpa) this would result in at least 19,320 dwellings to be delivered during the plan period up to 31st March 2036.

Summary:
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Response:
The Local Plan is due to be Submitted early 2020 and plans containing strategic policies have Inspector’s appointed within 1-3 weeks and the subsequent timescales for Hearings and adoption are considered achievable within 2020 meaning there would be 15 years from the date of adoption still i.e. 2035. Notwithstanding this, Policy 6/Chapter 16 identifies a number of allocations that will still be delivering post 2035 given the size of the sites and there is now a statutory requirement to review a Local Plan at least every 5 years anyhow meaning such matters will be looked at several times well before the end of the plan period whether that’s 2035 or a year or two later.
4.1 Draft Policy 3 as drafted is considered to be unsound and should be amended to state that the Council will seek to deliver a minimum of 18,400 new homes during the plan period in accordance with paragraph 60 of the NPPF. It is considered that there is scope to allocate additional housing over and above what is currently proposed, to provide a buffer and ensure delivery throughout the plan period. The Council should look at distributing additional housing sites in accordance with the settlement hierarchy, such as Thorne. From a review of the current distribution of allocations it is considered that the Council should revisit the current strategy and seek to focus further housing to the Main Town settlements rather than Service Towns and Villages as shown on the table below. Table 4.1 Distribution of proposed allocations  Settlement: Doncaster MUA Proposed distribution (Policy 3): 6,805 - 7,315 Proposed Allocation Up to 2035 (Table H1 and H2)**: 7,441 Percentage of Total Allocations (Table H1 and H2): 46% Settlement: Main Towns Proposed distribution (Policy 3): 2,985 - 6,715 Proposed Allocation Up to 2035 (Table H1 and H2)**: 6,292 Percentage of Total Allocations (Table H1 and H2): 39% Settlement: Service Towns and Villages Proposed distribution (Policy 3): 1,360 Proposed Allocation Up to 2035 (Table H1 and H2)**: 2,382 Percentage of Total Allocations (Table H1 and H2): 15% Settlement: Total Proposed distribution (Policy 3): 11,150 - 15,390 Proposed Allocation Up to 2035 (Table H1 and H2)**: 16,115 Percentage of Total Allocations (Table H1 and H2): 100% Source: Lichfields Analysis Excludes delivery beyond plan period* Uses units remaining in respect of Table H1** 4.3 The plan in its current form is neither adequate nor proportionate and fails to take account of local market signals within the Thorne/Moorends settlement. The Council should seek to distribute additional housing to Thorne over and above its current allocation in order to fully meet the proportion of housing distributed to the settlement.

Summary:

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Response:

The Local Plan sets out a supply of housing that far exceeds the 18,400 new homes so it is clear that this is already an ‘at least’ figure and there are also many other sources of additional housing land supply in addition to the allocations themselves. There are additional sources of supply identified in addition to this so a buffer is built into the allocations already. A buffer on top of this would be buffering a supply that has already been delivered. Further detail is provided at Policy 6 and the Site Selection Methodology. The approach to the settlement hierarchy requires consideration of sequential testing so that avoidance of flood risk, where possible, has been taken. The economic growth-led component of the housing requirement is considered as being more footloose and, in accordance with previous Reg 18 consultation, has followed a sequential avoidance of flood risk approach where possible. An allocation to Thorne higher than that identified in the Local Plan and would require land in flood zone 3.
3.9 Draft Policy 3 states that the Council will apply the proposed housing requirement of 920 dpa when considering allocations during the plan period (2015 - 2035), however for the purposes of calculating five year housing land supply the Council will rely on the Standard Methodology figure. It is considered that this approach does not meet national policy and guidance. The PPG (Note 1 - 1 Paragraph: 005 Reference ID: 68-005-20190722) states that: Housing requirement figures identified in adopted strategic housing policies should be used for calculating the 5 year housing land supply figure where: - the plan was adopted in the last 5 years, or - the strategic housing policies have been reviewed within the last 5 years and found not to need updating. In other circumstances the 5 year housing land supply will be measured against the area’s local housing need calculated using the standard method. 3.10 Therefore, once the local plan is adopted the Council should be applying the housing requirement which was adopted and not the standard methodology. The Council should revisit this policy to ensure it is in compliance with national planning policy (paragraph 73 of the NPPF).

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Response:
PPG supports the principle of being able to set the requirement as a range. NPPF is clear that Planning decisions should be taken following a plan-led approach. The Council could have just adopted the standard methodology figure as the Local Plan housing requirement in the first instance but have resisted such an approach and instead are planning for a very significant uplift for our ambitions for growth and this is reflected in the scale of allocations proposed. That said, the vast majority of this ambition needs to be delivered by the development industry and the market which may struggle to continue to meet such a high target. The Council has relatively little role to play post Planning decisions being granted in terms of actual housing delivery. Losing control of 5YHLS in this context therefore undermines the key policy objective of having a plan-led approach rather than the presumption that would be applied if 5YHLS cannot be demonstrated.
Tests of Soundness:

Comment:

3.6 Paragraph 11 of the NPPF states that: plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change. 3.7 This flexibility can be achieved by identifying land as housing allocations which appropriately exceed the housing requirement to provide market choice and to act as a buffer should allocations not become available in the time or manner expected, or should circumstances prevent the expected site yields being fulfilled. 3.8 The Plan should therefore seek to allocate land which will meet the minimum requirement and then apply an appropriate buffer on top of this residual requirement. The Council should also be looking to allocate sites across the whole plan period and it is unclear why the Council choose to apply different plan periods when calculating its five year housing land supply and considering allocations to meet its housing need. It is noted that the draft Local Plan currently proposes to allocate sites which will have a combined capacity significantly in excess of the residual requirement of 15,000 dwellings. However, there is scope for this to be further increased to deliver housing within sustainable settlements such as Thorne/Moorends to meet housing needs across a full NPPF-compliant plan period.

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As the Representation acknowledges, allocations have been made that far exceed the actual housing requirement and there are additional sources of supply identified in addition to this so a buffer is built into the allocations already. A buffer on top therefore would be buffering a supply that has already been buffered. Further detail is provided at Policy 6 and the Site Selection Methodology.
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**Summary:**

NPPF Paragraph 22 states that strategic policies should look ahead over a minimum 15 year period from adoption. It is important that the Council makes robust assumptions within their evidence base in respect of expected adoption of the Local Plan. It is considered that the LDS timescale is optimistic and it is unclear if the Council has made an allowance for Main Modifications to be drawn up, consulted on and considered within the estimated examination period. The LDS should be amended particularly in respect of timeframes between submission and examination. The Kirklees Local Plan took 6 months from submission to the Secretary of State to the start of the examination, the examination (including main modifications) lasted 12 months, and the Inspector’s report was received three months following the close of the main modifications consultation. These timeframes are considered to be a more realistic indication of the likely time which will be needed at Doncaster and would suggest an estimated date of adoption of September 2021, as shown below: Stage: Submission to the Secretary of State DC Estimate: Late Autumn 2019 Lichfields Estimate: November 2019 Stage: Estimated examination period (assumed this period includes Main Modifications) Council Estimate: Winter 2019/20 Lichfields Estimate: May 2020 - May 2021 Stage: Receipt of inspector’s report Council Estimate: Spring 2020 Lichfields Estimate: August 2021 Stage: Estimated date of adoption Council Estimate: Summer 2020 Lichfields Estimate: September 2021. The plan period should be extended to account for the estimated adoption based on Lichfields timeframes and to ensure that a minimum 15 year time period from adoption is achieved. Based on the Council’s housing requirement (920 dpa) this would result in at least 19,320 dwellings to be delivered during the plan period up to 31st March 2036.

**Response:**

The Local Plan is due to be Submitted early 2020 and plans containing strategic policies have Inspector’s appointed within 1-3 weeks and the subsequent timescales for Hearings and adoption are considered achievable within 2020 meaning there would be 15 years from the date of adoption still i.e. 2035. Notwithstanding this, Policy 6/Chapter 16 identifies a number of allocations that will still be delivering post 2035 given the size of the sites and there is now a statutory requirement to review a Local Plan at least every 5 years anyhow meaning such matters will be looked at several times well before the end of the plan period whether that’s 2035 or a year or two later.
4.1 Draft Policy 3 as drafted is considered to be unsound and should be amended to state that the Council will seek to deliver a minimum of 18,400 new homes during the plan period in accordance with paragraph 60 of the NPPF. 4.2 It is considered that there is scope to allocate additional housing over and above what is currently proposed, to provide a buffer and ensure delivery throughout the plan period. The Council should look at distributing additional housing sites in accordance with the settlement hierarchy, such as Thorne. From a review of the current distribution of allocations it is considered that the Council should revisit the current strategy and seek to focus further housing to the Main Town settlements rather than Service Towns and Villages as shown on the table below. Table 4.1 Distribution of proposed allocations Settlement: Doncaster MUA Proposed distribution (Policy 3): 6,805 - 7,315 Proposed Allocation Up to 2035 (Table H1 and H2)* **: 7,441 Percentage of Total Allocations (Table H1 and H2): 46% Settlement: Main Towns Proposed distribution (Policy 3): 2,985 - 6,715 Proposed Allocation Up to 2035 (Table H1 and H2)* **: 6,292 Percentage of Total Allocations (Table H1 and H2): 39% Settlement: Service Towns and Villages Proposed distribution (Policy 3): 1,360 Proposed Allocation Up to 2035 (Table H1 and H2)* **: 2,382 Percentage of Total Allocations (Table H1 and H2): 15% Settlement: Total Proposed distribution (Policy 3): 11,150 - 15,390 Proposed Allocation Up to 2035 (Table H1 and H2)* **: 16,115 Percentage of Total Allocations (Table H1 and H2): 100% 4.3 The plan in its current form is neither adequate nor proportionate and fails to take account of local market signals within the Thorne/Moorends settlement, and if allowed to continue will both stifle market conditions and cause additional affordability concerns for local residents. The Council should seek to distribute additional housing to Thorne over and above its current allocation in order to fully meet the proportion of housing distributed to the settlement.

Summary:
Policy 3 is unsound and should be amended to state that the Council will seek to deliver a minimum of 18,400 new homes during the plan period in accordance with paragraph 60 of the NPPF. There is scope to allocate additional housing over and above what is currently proposed so to provide a buffer and ensure delivery throughout the plan period. Additional housing sites should be distributed in accordance with the settlement hierarchy, such as Thorne. The current strategy should seek to focus further housing to the Main Town settlements rather than Service Towns and Villages as shown on the table below. Table 4.1 Distribution of proposed allocations Settlement: Doncaster MUA Proposed distribution (Policy 3): 6,805 - 7,315 Proposed Allocation Up to 2035 (Table H1 and H2)* **: 7,441 Percentage of Total Allocations (Table H1 and H2): 46% Settlement: Main Towns Proposed distribution (Policy 3): 2,985 - 6,715 Proposed Allocation Up to 2035 (Table H1 and H2)* **: 6,292 Percentage of Total Allocations (Table H1 and H2): 39% Settlement: Service Towns and Villages Proposed distribution (Policy 3): 1,360 Proposed Allocation Up to 2035 (Table H1 and H2)* **: 2,382 Percentage of Total Allocations (Table H1 and H2): 15% Settlement: Total Proposed distribution (Policy 3): 11,150 - 15,390 Proposed Allocation Up to 2035 (Table H1 and H2)* **: 16,115 Percentage of Total Allocations (Table H1 and H2): 100% Source: Lichfields Analysis Excludes delivery beyond plan period* Uses units remaining in respect of Table H1** 4.3 The plan in its current form is neither adequate nor proportionate and fails to take account of local market signals within the Thorne/Moorends settlement. Additional housing should be distributed to Thorne over and above its current allocation.

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Tests of Soundness:

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As the Representation acknowledges, allocations have been made that far exceed the actual housing requirement and there are additional sources of supply identified in addition to this so a buffer is built into the allocations already. A buffer on top therefore would be buffering a supply that has already been buffered. Further detail is provided at Policy 6 and the Site Selection Methodology.
3.1 Draft Policy 3 states that the plan period in which to meet the Council’s aspirations for Doncaster is 2015 - 2035. 3.2 Paragraph 22 of National Planning Policy Framework (NPPF) states that strategic policies should look ahead over a minimum 15 year period from adoption. This is to ensure that the plan responds to long-term requirements and opportunities. It is important that the Council makes robust assumptions within their evidence base in respect of expected adoption of the Local Plan. 3.3 The Council’s latest Local Development Scheme (LDS) (March 2019) states that the plan will not be adopted until Summer 2020. It is considered that the LDS is optimistic in its timeframes from submission of the Local Plan up to adoption. It is unclear if the Council has made an allowance for Main Modifications to be drawn up, consulted on and considered within the estimated examination period. 3.4 From Lichfields’ experience of Local Plan examinations within the Yorkshire area, it is considered that the timeframes within the LDS should be amended, particularly in respect of timeframes between submission and examination. As an example, the Kirklees Local Plan took 6 months from submission to the Secretary of State to the start of the examination, the examination (including main modifications) lasted 12 months, and the Inspector’s report was received three months following the close of the main modifications consultation. These timeframes are considered to be a more realistic indication of the likely time which will be needed at Doncaster and would suggest an estimated date of adoption of September 2021, as shown in Table 3.1. Table 3.1 Estimated timeframe for Local Plan examination Stage: Submission to the Secretary of State DC Estimate: Late Autumn 2019 Lichfields Estimate: November 2019 Stage: Estimated examination period (assumed this period includes Main Modifications) DC Estimate: Winter 2019/20 Lichfields Estimate: May 2020 - May 2021 Stage: Receipt of inspector’s report DC Estimate: Spring 2020 Lichfields Estimate: August 2021 Stage: Estimated date of adoption DC Estimate: Summer 2020 Lichfields Estimate: September 2021 Source: Lichfield Analysis 3.5 It is considered that the plan period should be extended to account for the estimated adoption based on Lichfields timeframes and to ensure that a minimum 15 year time period from adoption is achieved. Based on the Council’s housing requirement (920 dpa) this would result in at least 19,320 dwellings to be delivered during the plan period up to 31st March 2036.

Summary: NPPF Paragraph 22 states that strategic policies should look ahead over a minimum 15 year period from adoption. It is important that the Council makes robust assumptions within their evidence base in respect of expected adoption of the Local Plan. It is considered that the LDS timescale is optimistic and it is unclear if the Council has made an allowance for Main Modifications to be drawn up, consulted on and considered within the estimated examination period. The LDS should be amended particularly in respect of timeframes between submission and examination. The Kirklees Local Plan took 6 months from submission to the Secretary of State to the start of the examination, the examination (including main modifications) lasted 12 months, and the Inspector’s report was received three months following the close of the main modifications consultation. These timeframes are considered to be a more realistic indication of the likely time which will be needed at Doncaster and would suggest an estimated date of adoption of September 2021, as shown below: Stage: Submission to the Secretary of State DC Estimate: Late Autumn 2019 Lichfields Estimate: November 2019 Stage: Estimated examination period (assumed this period includes Main Modifications) Council Estimate: Winter 2019/20 Lichfields Estimate: May 2020 - May 2021 Stage: Receipt of inspector’s report Council Estimate: Spring 2020 Lichfields Estimate: August 2021 Stage: Estimated date of adoption Council Estimate: Summer 2020 Lichfields Estimate: September 2021 The plan period should be extended to account for the estimated adoption based on Lichfields timeframes and to ensure that a minimum 15 year time period from adoption is achieved. Based on the Council’s housing requirement (920 dpa) this would result in at least 19,320 dwellings to be delivered during the plan period up to 31st March 2036.

Response: The Local Plan is due to be Submitted early 2020 and plans containing strategic policies have Inspector’s appointed within 1-3 weeks and the subsequent timescales for Hearings and adoption are considered achievable within 2020 meaning there would be 15 years from the date of adoption still i.e. 2035. Notwithstanding this, Policy 6/Chapter 16 identifies a number of allocations that will still be delivering post 2035 given the size of the sites and there is now a statutory requirement to review a Local Plan at least every 5 years anyhow meaning such matters will be looked at several times well before the end of the plan period whether that’s 2035 or a year or two later.
4.1 Draft Policy 3 as drafted is considered to be unsound and should be amended to state that the Council will seek to deliver a minimum of 18,400 new homes during the plan period in accordance with paragraph 60 of the NPPF. The current strategy should seek to focus further housing to the Main Town settlements rather than Service Towns and Villages as shown on the table below. Table 4.1 Distribution of proposed allocations Settlement: Doncaster MUA Proposed distribution (Policy 3): 6,805 - 7,315 Proposed Allocation Up to 2035 (Table H1 and H2)* **: 7,441 Percentage of Total Allocations (Table H1 and H2): 46% Settlement: Main Towns Proposed distribution (Policy 3): 2,985 - 6,715 Proposed Allocation Up to 2035 (Table H1 and H2)* **: 6,292 Percentage of Total Allocations (Table H1 and H2): 39% Settlement: Service Towns and Villages Proposed distribution (Policy 3): 1,360 Proposed Allocation Up to 2035 (Table H1 and H2)* **: 2,382 Percentage of Total Allocations (Table H1 and H2): 15% Settlement: Total Proposed distribution (Policy 3): 11,150 - 15,390 Proposed Allocation Up to 2035 (Table H1 and H2)* **: 16,115 Percentage of Total Allocations (Table H1 and H2): 100% Source: Lichfields Analysis Excludes delivery beyond plan period* Uses units remaining in respect of Table H1** 4.3 The plan in its current form is neither adequate nor proportionate and fails to take account of local market signals within the Thorne/Moorends settlement, and if allowed to continue will both stifle market conditions and cause additional affordability concerns for local residents. The Council should seek to distribute additional housing to Thorne over and above its current allocation in order to fully meet the proportion of housing distributed to the settlement.

Summary:

Policy 3 is unsound and should be amended to state that the Council will seek to deliver a minimum of 18,400 new homes during the plan period in accordance with paragraph 60 of the NPPF. There is scope to allocate additional housing over and above what is currently proposed to provide a buffer and ensure delivery throughout the plan period. The current strategy should seek to focus further housing to the Main Town settlements rather than Service Towns and Villages as shown on the table below. Table 4.1 Distribution of proposed allocations Settlement: Doncaster MUA Proposed distribution (Policy 3): 6,805 - 7,315 Proposed Allocation Up to 2035 (Table H1 and H2)* **: 7,441 Percentage of Total Allocations (Table H1 and H2): 46% Settlement: Main Towns Proposed distribution (Policy 3): 2,985 - 6,715 Proposed Allocation Up to 2035 (Table H1 and H2)* **: 6,292 Percentage of Total Allocations (Table H1 and H2): 39% Settlement: Service Towns and Villages Proposed distribution (Policy 3): 1,360 Proposed Allocation Up to 2035 (Table H1 and H2)* **: 2,382 Percentage of Total Allocations (Table H1 and H2): 15% Settlement: Total Proposed distribution (Policy 3): 11,150 - 15,390 Proposed Allocation Up to 2035 (Table H1 and H2)* **: 16,115 Percentage of Total Allocations (Table H1 and H2): 100% Source: Lichfields Analysis Excludes delivery beyond plan period* Uses units remaining in respect of Table H1** The Plan not adequate or proportionate and fails to take account of local market signals within the Thorne/Moorends settlement. Additional housing should be distributed to Thorne over and above its current allocation.

Response:

The Local Plan sets out a supply of housing that far exceeds the 18,400 new homes so it is clear that this is already an ‘at least’ figure and there are also many other sources of additional housing land supply in addition to the allocations themselves. There are additional sources of supply identified in addition to this so a buffer is built into the allocations already. A buffer on top therefore would be buffering a supply that has already been buffered. Further detail is provided at Policy 6 and the Site Selection Methodology. The approach to the settlement hierarchy requires consideration of sequential testing so that avoidance of flood risk, where possible, has been taken. The economic growth-led component of the housing requirement is considered as being more footloose and, in accordance with previous Reg 18 consultation, has followed a sequential avoidance of flood risk approach where possible. An allocation to Thorne higher that that identified in the Local Plan and would require land in flood zone 3.
Policy 3 'Level and Distribution of Growth', sets out that the Local Plan's strategic aim is to facilitate the delivery of 18,400 homes in the period of 2015 - 2035 (920 annum), with sufficient land allocated to deliver 15 years' supply of housing. To meet the Local Plan's Spatial Strategy and Settlement Hierarchy, at least 40% of the Borough’s Total Housing will be located within the Main Towns which includes Hatfield & Stainforth. For Hatfield this equates to a provision of 575 - 1,085 dwellings over the plan period. The site is identified to have an indicative provision of 72 dwellings, which will make a significant contribution to the delivery of housing in Hatfield and Stainforth over the plan period. This site is therefore essential to meet the overall strategic aim for the Borough to deliver 18,400 homes during the plan period.

Summary:
Policy 3 'Level and Distribution of Growth Supportive of Policy and contribution that Site 170 can make to objectives.

Response:
Support noted.
Policy 3 'Level and Distribution of Growth', sets out that the Local Plan's strategic aim is to facilitate the delivery of 18,400 homes in the period of 2015 - 2035 (920 annum), with sufficient land allocated to deliver 15 years' supply of housing. To meet the Local Plan's Spatial Strategy and Settlement Hierarchy, 40% of the Borough's Total Housing need is earmarked to be delivered within Main Towns. Mexborough is identified within this classification and it is proposed that the settlement will deliver 475 - 985 dwellings over the plan period. The allocations of the site will make a significant contribution to the delivery of housing in Mexborough over the plan period. This site is therefore essential to meet the overall strategic aim for the Borough to deliver 18,400 homes during the plan period.

Summary:
Policy 3 'Level and Distribution of Growth Supports allocation of Pastures Road sites and contribution they can make to Policy objectives.

Response:
Support noted.
Policy 3 'Level and Distribution of Growth', sets out that the Local Plan's strategic aim is to facilitate the delivery of 18,400 homes in the period of 2015 - 2035 (920 annum), with sufficient land allocated to deliver 15 years' supply of housing. To meet the Local Plan's Spatial Strategy and Settlement Hierarchy, 40% of the Borough's Total Housing need is earmarked to be delivered within Main Towns. Mexborough is identified within this classification and it is proposed that the settlement will deliver 475 - 985 dwellings over the plan period. The allocations of the site will make a significant contribution to the delivery of housing in Mexborough over the plan period. This site is therefore essential to meet the overall strategic aim for the Borough to deliver 18,400 homes during the plan period.
Policy 3 'Level and Distribution of Growth', sets out that the Local Plan's strategic aim is to facilitate the delivery of 18,400 homes in the period of 2015 - 2035 (920 annum), with sufficient land allocated to deliver 15 years' supply of housing. To meet the Local Plan's Spatial Strategy and Settlement Hierarchy, at least 50% of the Borough’s Total Housing will be located within the Doncaster Main Urban Area, which equates to at least 6,805 - 7,315 dwellings. The site is proposed to be located within the development boundary for Doncaster and is therefore included within the Doncaster Main Urban Area, this policy is supported. The site will deliver 671 dwellings over the plan period which is a significant amount and it is therefore essential to meet the strategic aim of the Borough to deliver 18,400 homes during the plan period. The allocation of this site for housing meets the objective of paragraph 117 of the NPPF, which sets out that planning policies should promote the effective use of land in meeting the need for homes and that strategic policies should make use of previously developed land as much as possible.

Summary:
Policy 3 'Level and Distribution of Growth' Supportive of allocation of site 838 and contribution towards objectives of the Policy.

Response:
Support noted.
Policy 3: Level and Distribution of Growth 1. The Local Plan should be updated to reflect the housing requirement of 1,073 dwellings per annum for the plan period to 2035. 2. Have own report from the 'Strategic Planning Resource Unit (SPRU) to justify the higher housing figure. 3. Conclude that significantly greater levels of potentially suitable growth could be provided at different tiers of the settlement hierarchy. 4. Policy fails to meet requirements of revised SCR economic plan (as yet not published) 5. Over reliance on sites with PP and previously allocated sites. 6. Recommend the consideration of Tier 3 - Service Towns and Larger Villages as potential locations for additional growth. Distribution of Growth 1. The distribution of housing provision within Policy 3 - Service Towns and Larger Villages should be reapportioned (or alternatively flexibility introduced) to support the delivery of a higher proportion of the housing within sustainable and desirable locations close to economic growth. 2. Local Plan as drafted is overly reliant on a significant quantum of sites within the Main Urban Area. This approach relies on the delivery of a notable number of large-scale sites, which will require substantial enabling infrastructure in order to deal with constraints that may include contamination and highways infrastructure upgrades as well as drainage and other matters. 3. The growth potential of a number of Service Towns and Larger Villages has been underestimated and that Askern should have an increased allocation of housing land within these settlements in order to capture the regeneration opportunities available and to deliver housing in sustainable locations where there is recognised demand. 4. The limited housing target identified. We object to this approach and consider it to be unsound. 5. The proposed approach to the delivery of housing, as drafted, fundamentally fails to recognise the emphasis within the Framework on the deliverability of housing and the need to support the prosperity of settlements outside of the main urban area. 6. The proposed housing distribution within the draft plan has a strong focus on the Main Urban Area with 50% of development proposed in the Doncaster Main Urban Area, followed by 40% in second tier (Main Towns) locations, 10% in Services Towns and Larger Villages and limited development in Defined Villages. The proposed distribution is based on the Settlement Background Paper which forms a settlement hierarchy and informs the location of housing and employment sites. 2.21 The Publication Doncaster Local Plan identifies Askern as one of 10 Service Towns/Villages which will provide about 10% of the Borough’s total housing requirement during the plan period. Specifically, Askern is identified to deliver 165 dwellings. 2.22 Based on existing permission (648 units), new allocations (127 units) and reserved development sites (29 units), the settlement is identified to deliver 804 new units in the plan period, above its proposed requirement by 639 units. 2.23 The Sustainability Appraisal for the Publication Local Plan discounts sites from allocation based on sufficient desirable sites already being identified. We object to this approach and consider it to be unsound. 2.24 It is not considered appropriate that such limited levels of allocations have been identified in large settlements such as Askern. The only justification put forward for failing to allocate alternative sites for development is based on existing permissions and limited proposed allocations within these settlements. These sites have yet to be delivered and particularly in the case of UDP allocations carried forward, may suffer from issues including viability that could impact future delivery. 2.25 The proposed approach to the delivery of housing, as drafted, fundamentally fails to recognise the emphasis within the Framework on the deliverability of housing and the need to support the prosperity of settlements outside of the main urban area. 2.26 While settlements such as Askern may rely on towns to provide essential services, the need to sustain the existing services will require additional employment and housing. The continuing trend for a reduction in household size means downsizing will undercut the customer/user thresholds to which current amenities and facilities have become accustomed. This poses a significant threat to the current level of sustainability enjoyed by the settlement. 2.27 The housing allocations requirements should not be based purely on the hierarchy of a settlement as there are a number of considerations namely urban capacity, need and demand for housing, regeneration, environmental and social considerations, prioritising brownfield land which need to be taken into account to ensure the growth of settlements in a sustainable manner. Recommendation 2.28 The distribution of housing provision within Policy 3 - Service Towns and Larger Villages should be reapportioned (or alternatively flexibility introduced) to support the delivery of a higher proportion of the housing within sustainable and desirable locations close to economic growth. Justification 2.29 The Local Plan as drafted is overly reliant on a significant quantum of sites within the Main Urban Area. This approach relies on the delivery of a notable number of large sites, which will require substantial enabling infrastructure in order to deal with constraints that may include contamination and highways infrastructure upgrades as well as drainage and other matters. 3.0 The growth potential of a number of Service Towns and Larger Villages has been underestimated and that Askern should have an increased allocation of housing land within these settlements in order to capture the regeneration opportunities available and to deliver housing in sustainable locations where there is recognised demand. 2.31 The limited housing target apportioned to Askern does not appear to be proportionate to the size and character of the settlement and there seems to be no justification for not meeting some level of demand and need in these locations. This approach is likely to result in not only a missed opportunity to support the projected economic growth, but also lead to the decline of the settlement. 2.32 The potential for sustainable development in these areas should be realised, where deliverable, in order to support the long term viability of these settlements. A proportionate increase in housing provision for the settlement at Askern is consistent with the Plan's strategic priorities, including ensuring future support for economic growth, and would assist in ensuring the Local Plan meets needs for a full 15 year period following adoption. By reviewing existing Green Belt designations around these settlements, boundaries can be rationalised to allocate land for development to serve the purposes of these policy areas. 2.33 New housing allocations and mixed use schemes are considered to be an appropriate response to accommodating further development in these locations.
As demonstrated in the Housing Topic Paper, the Local Plan is proposing an appropriate housing requirement that will meet the needs of Doncaster and its aspirations for growth. Askern in particular has a very significant number of existing planning permissions which do not justify an increased housing target for the settlement.

2.11 The level of housing development to be delivered is set out in Policy 3, which states that the Council will seek 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). 2.12 Paragraph 59 of the National Planning Policy Framework (the ‘Framework’) sets out the Government’s objective of significantly boosting the supply of homes, through the identification of a sufficient amount and variety of land where it is needed and to meet the needs of groups with specific housing requirements [authors own emphasis]. 2.13 The SPRU report provided at Appendix 2 assesses the soundness of the proposed jobs-led housing requirement and the implications for the proposed spatial strategy. 2.14 For the reasons outlined within the report, there are found to be substantial soundness failings with the draft Local Plan resulting from a failure to test an appropriate reasonable alternative based on meeting the strategic priorities for economic development over a full 15-year plan period. These issues are compounded based on treating the housing requirement from 2018-2033 as a ‘residual total’ to account for perceived oversupply in the period 2015-2018, which has not been adequately justified. 2.15 The Council’s approach fails to accurately reflect the strategic priorities and future economic potential of the Sheffield City Region and further assessment of the proposed requirement is recommended to reflect the requirements of the revised Strategic Economic Plan (once published) and to consider recent trends in job growth and housing delivery across the subregion. This is anticipated to lead to a reassessment of current and future demographic trends in relation to future labour supply. 2.16 The report also concludes that arbitrary constraints to the requirement for additional development are applied, which will lead to an overreliance on extant planning commitments and historic allocations in previous iterations of the development plan. The implications of this in terms of prospects for maintaining a five year supply of deliverable sites and meeting the housing needs of different groups have not been fully assessed, however it is anticipated that there could be a failure to meet housing need, particularly in respect of affordable housing in the short to medium term, as the physical and viability related constraints that have prevented these sites being delivered to date may persist. 2.17 The report concludes that these issues are capable of remedy within the Council’s broad emerging approach to managing the distribution of growth across the spatial strategy. This acknowledges that significantly greater levels of potentially suitable growth could be provided at different tiers of the settlement hierarchy. We endorse the Council’s position that Main Towns are appropriate locations to accommodate up to 10% of the economically-led component of the housing requirement. However, we also recommend the consideration of Tier 3 - Service Towns and Larger Villages as potential locations for additional growth, where sustainable growth opportunities are identified. Recommendation 2.18 The Local Plan should be updated to reflect the housing requirement of 1,073 dwellings per annum for the plan period to 2035. Justification 2.19 For the reasons set out above and within the appended SPRU report, it is correct to accommodate growth based on meeting requirements under the full assessment of jobs-led growth (1,073 dpa) for the full plan period to 2035.

Summary:
Policy 3: Level and Distribution of Growth 1. The Local Plan should be updated to reflect the housing requirement of 1,073 dwellings per Annum for the plan period to 2035. 2. Have own report from the ‘Strategic Planning Resource Unit (SPRU) to justify the higher housing figure. 3. Concludes that significantly greater levels of potentially suitable growth could be provided at different tiers of the settlement hierarchy. 4. Policy fails to meet requirements of revised SCR economic plan (as yet not published) 5. over reliance on sites with PP and previously allocated sites. 6. Recommend the consideration of Tier 3 - Service Towns and Larger Villages as potential locations for additional growth. Distribution of Growth 1. The distribution of housing provision within Policy 3 - Service Towns and Larger Villages should be reapportioned (or alternatively flexibility introduced) to support the delivery of a higher proportion of the housing within sustainable and desirable locations close to economic growth. 2. Local Plan as drafted is overly reliant on a significant quantum of sites within the Main Urban Area 4. Askern should have an increased allocation of housing land in order to capture the regeneration opportunities. 5. The limited housing target apportioned to Askern does not appear to be proportionate to the size and character of the settlement

Response:
As demonstrated in the Housing Topic Paper, the Local Plan is proposing an appropriate housing requirement that will meet the needs of Doncaster and its aspirations for growth. Askern in particular has a very significant number of existing planning permissions which do not justify an increased housing target for the settlement.
4.1 The policy is not sound as it is not positively prepared, justified, consistent with national policy or effective. 4.2 Policy 3 of the Publication Draft of the Local Plan sets a target for at least 920 (net) new homes each year over the plan period 2015-2035 (18,400 homes in total) with sufficient land allocated to deliver the housing requirement. 4.3 The proposed level of housing growth remains unchanged since the draft policies consultation in 2018. Therefore, Pegasus continue to question whether this approach to meeting the needs for new homes demonstrates that the Plan is positively prepared and justified. 4.4 The PPG states the Government will be supportive of authorities who wish to plan for growth. In addition, the PPG identifies other factors which need to be considered when determining the housing requirement. These include growth strategies, planned infrastructure, previous levels of delivery and recent assessments of need such as Strategic Housing Market Assessments (SHMA) where this suggests a higher need (PPG ID 2a-010). These are all important considerations in the context of Doncaster. It is not considered that the housing requirement within Doncaster adequately meets the economic aspirations of the area. 4.4 It should also be noted that between 2004/5 and 2017/18 housing delivery averaged in excess of 1,000 net additional dwellings. Since the start of the plan period (2015) average delivery rates have been higher at 1,140 net additional dwellings. Setting the housing requirement lower than average levels of delivery over the previous 14 years and 220dpa lower than the plan period average, would be contrary to the ethos of the NPPF and the Government’s continued desire to boost significantly the supply and delivery of housing.

Summary:
The policy is not sound as it is not positively prepared, justified, consistent with national policy or effective. Policy 3 proposes the same level of housing growth since the draft policies in October 2018 consultation. Therefore, continue to question this approach is meeting the needs for new homes to demonstrate the Plan is positively prepared and justified. PPG identifies other factors which need to be considered when determining housing requirements it is not considered that the requirement within Doncaster adequately meets the economic aspirations of the area. Between 2004/05 and 2017/18 housing delivery averaged in excess of 1000 net additional dwellings. Since the start of the plan period average delivery rates have been higher. Therefore setting the housing requirement lower than the average levels of delivery over previous years would be contrary to the ethos of the NPPF and Governments desire to boost supply and delivery of housing.

Response:
The figure is derived from the Standard Methodology and an economic uplift in line with SCR ambitions. A number of ways of calculating the housing requirement have been put forward. Housing completion figures are available in the RLA, with this report showing that in the period stated, the housing completions average out at 659 dpa, with 1,000 dpa only being surpassed in the years 2015 - 18. As set out in the Green Belt Topic Paper, it is not deemed that exceptional circumstances exist which warrant the removal of more land from the Green Belt to make up for the 20 unit shortfall in Bawtry, and this will be made up elsewhere in the borough. Windfalls are additional as they have not been factored in to any calculations, however even without factoring these in, the borough can meet its housing requirement across the plan period.
Chapter 4: Strategic Approach

Policy 3: Level & Distribution of Growth

Soundness of Policy 3 to deliver the level and distribution of growth. 4.55 Whilst we get a sense that the supply of housing provided through allocations with and without permission far exceeds the plan period requirement. The allocations provide for 665 new dwellings in Edlington. Soundness of Policy 3 to deliver the level and distribution of growth. 4.55 Whilst we generally support the thrust of the policies towards strategic sites to deliver growth and support the distribution, we object to the lack of new employment allocations in the west of the borough in preference for new employment allocations to the south and east. 4.56 It is considered that the Policy is unsound and is not justified and is not the most appropriate strategy when assessed against the reasonable alternatives. Reasoning 4.57 The Spatial Strategy and settlement Hierarchy seek to deliver sustainable growth that is appropriate to the size of individual settlements to meet the needs for new homes and jobs and to help to maintain strong sustainable communities, a strategy which we support. 4.58 Policy 3 which distributes growth in the borough conflicts with this strategy. The lack of new employment allocations in the west of the borough fails to recognise the existing functions within the communities in the west of the borough which include a number of existing employment locations/sites. 4.59 The settlements of Mexborough, Conisbrough, Denaby and Edlington (the west of the Borough) provide 5 identified existing employment sites. These sites provide some of the boroughs largest employers, including Polypipe at Edlington. 4.60 Paragraph 2.22 of the Plan, Policy 2, paragraph 4.27 all refer to the importance of communities and accessibility to the local employment opportunities which reflects the relatively self contained economy with approximately 80% of workers travelling to work in the Borough and a fifth travelling to work in the same electoral ward in which they live. 4.61 The vision of the Plan seeks to help encourage existing business to expand as well as attracting new businesses to the Borough. 4.62 The plan recognises current live/work patterns and the importance of existing businesses. There is a conflict between the Plans strategy which seeks to create and maintain strong, sustainable, cohesive and inclusive communities and Policy 3, the distribution of the employment sites which fails to maintain existing communities by failing to provide sufficient flexibility and choice to existing businesses. 4.63 The lack of any new employment sites (with the exception of a small site 743 at Edlington) clearly conflicts with the evidence and is not justified. 4.64 Whilst the strategic vision for employment growth on the M1/M18 corridor and Doncaster Sheffield Airport, together with infrastructure improvements is understood and supported, there is clearly a need to support existing businesses and residents, particularly those in the west of the borough.
through the provision of employment allocations providing the opportunity for existing businesses to expand. 4.65 The need for additional employment allocations in the west of the borough is further supported by the housing growth allocated and proposed in the area. Between 1,170 and 2,190 new homes are expected to delivered in the settlements to the west of the Borough (Mexborough, Conisbrough, Denaby and Edlington). The lack of additional employment allocations to support new residential growth is unsustainable and is not based on the evidence which clearly identifies the self contained and sustainable live work patterns. 4.66 Should the distribution of the sites set out in Policy 3 be adopted, this would not provide a choice and flexibility to existing and new employment opportunities. It will constrain existing employment occupiers who are seeking to expand in existing locations. The lack of sites in existing locations may lead to relocations and the loss of businesses from the Borough. Summary of objection to Policy 3 Level and Distribution of Growth (Strategic Policy). 4.67 To summarise, we object to policy 3 of the Plan and do not consider the plan is sound. It is not considered that the current distribution is effective in delivering the vision or justified by the evidence base. 4.68 The lack of new employment allocations in the west of the Borough does not provide an appropriate solution to support the 5 existing employment sites and occupiers when the taking into account the level of housing growth identified. 4.69 The evidence base clearly shows the borough is a self contained economy with people living and working locally. Whilst we support the growth aspirations and vision of the Plan, there is also a need to recognise and support existing businesses and patterns of live/ work particularly in deprived locations in the west of the Borough where employment needs are high. Proposed changes to the plan to make it Sound 4.70 It is considered that additional new employment allocations and extensions to existing employment sites in the west of the Borough should be delivered. This will ensure that sustainable new communities are created in the west of the borough through the delivery and growth of new homes and opportunities for existing businesses to grow and remain in the area. 4.71 Additional new employment site allocations are required in Edlington, Mexborough, Conisbrough and Denaby. 4.72 These representations are written with specific regard to and support for an expansion to Broomhouse Lane Industrial Estate, Edlington to enable the existing occupier Polypipe to expand so that they are able to continue to operate efficiently from their location. Section 5 of this report provides details of the two proposed expansion sites.

Summary:
The rep summarises and discusses policy 3 for information. the only site allocation in the west of the Borough is site 743 at Broomhouse Lane Industrial Estate which is a small site (0.75ha)with planning permission for B2 use. generally support the thrust of the policies towards strategic sites to deliver growth and support the distribution Object to the lack of new employment allocations in the west of the borough in preference for new employment allocations to the south and east. the Policy is unsound and is not justified and is not the most appropriate strategy when assessed against the reasonable alternatives. Proposed changes to the plan to make it Sound additional new employment allocations and extensions to existing employment sites in the west of the Borough should be delivered. This will ensure sustainable new communities are created in the west of the borough through the delivery and growth of new homes and opportunities for existing businesses to grow and remain in the area. Additional new employment site allocations are required in Edlington, Mexborough, Conisbrough and Denaby. The representation are written with specific regard to and support for an expansion to Broomhouse Lane Industrial Estate.

Response:
Noted. Support welcomed. The Green Belt Topic Paper explains why there are no employment allocations within the Green Belt at this time i.e. it is considered that there are currently no exceptional circumstances. The explanatory text of Local Plan Policy 3 also explains that there is access to business parks across the border in Rotherham. These can be accessed using strong public transport links and road connectivity.
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**Area:** Chapter 4: Strategic Approach

**Policy:** Policy 3: Level & Distribution of Growth

**Tests of Soundness:**
- Positively prepared
- Effective
- Justified
- Consistent with national

**Comment:**

2.1 This section of the representation statement provides comment on the Local Plan Publication Version Consultation Document. 2.20 Policy 3 distributes the Plan’s employment and housing requirements. As previously highlighted, the proposed distribution to the Defined Villages only lists 14 of the Villages and no reference is made to the remaining 26 Villages. The footnote to the Defined Villages part of the distribution table suggests that development may be permissible in the 14 listed Villages yet this conflicts with the supporting policy text (paragraph 4.46) which states that there will be limited development opportunities in the 40 Defined Villages. Clarity is therefore sought as to whether development adjacent to the settlement limits of all 40 Defined Villages will be supported or just the 14 settlements listed in the distribution table. 2.21 If our understanding is correct that development will only potentially be supported adjacent to the 14 listed settlements, then Policy 2 and the supporting text to Policy 3 is misleading. 2.22 It remains our case that Clayton is a settlement where growth should be supported. There are limited opportunities for infill development, yet this is not an isolated rural settlement. It is situated less than 3km from Thurnscoe which has a wide range of services and a train station providing easy access to Doncaster. There is no justification or explanation provided as to why only 14 Defined Villages have been identified in the distribution table or what criteria has been used to choose the Villages where some level of growth may be supported. The proposed approach is therefore unjustified and not an appropriate approach as Clayton is excluded from the opportunity for small scale settlement extensions provided by Policy 2 despite being in a sustainable location.

**Summary:**

Policy 3 distributes the Plan’s employment and housing requirements. The proposed distribution to the Defined Villages only lists 14 of the Villages and no reference is made to the remaining 26 Villages, which includes Clayton. There is no justification or explanation provided as to why only 14 Defined Villages have been identified in the distribution table or what criteria has been used to choose the Villages where some level of growth may be supported. The proposed approach is therefore unjustified and not an appropriate approach as Clayton is excluded from the opportunity for small scale settlement extensions provided by Policy 2 despite being in a sustainable location.

**Response:**

Policy 2 supports the extension of villages in the Countryside in certain circumstances. However for settlements in the Green Belt national policy will be applied and this is explained in the Policy and explanatory text.
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.

Summary:
Plan period. Should be a minimum 15 years from adoption. 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 Plan.

Response:
The Council are planning to cover the 20 year period 2015 - 35 with allocations for the 15 year period 2018 - 33. Additionally, it is expected the plan will be reviewed within the plan period.
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**Comment Ref:** C/Policy 3/05319/1/007

**Attend Examination:** Attend Hearing

**Reason:** The matters raised in our representation go to the heart of the Local Plan. It is considered that attendance at the relevant hearing sessions will allow further comment to be made where appropriate.

**Area:** Chapter 4: Strategic Approach

**Policy:** Policy 3: Level & Distribution of Growth

**Tests of Soundness:**

- [ ]
- [ ]
- [ ]

**Comment:**

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.

**Summary:**

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.

**Response:**

Comment noted
Tests of Soundness:

Comment:

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 as 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 jobsled 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.

Summary:

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. Suggest that the Plan seeks to identify sufficient land for 29,400 dwellings, minus any supply from the years 2015 to 2019/20.

Response:

A number of ways and means have been submitted to calculate housing and jobs figures for the Local Plan. The Peter Brett’s Report explains the approach taken and ties jobs to housing growth, which includes a significant uplift from the Standard Methodology. As set out in the Housing Topic Paper, ample sites have been identified to meet the housing requirement for the entire plan period, and there are a number of sources of potential additional supply.
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."

Although the Local Plan does not specify a buffer, one has been created in effect by not counting within the total housing commitments for the plan period: any capacity remaining beyond 2035; windfalls; sites of 1-4 units; any development in Defined Villages; the proposed 280 dwellings at the airport + possible 920 further linked to job delivery; and the potential of Reserve Development Sites to deliver housing. If all these are factored in, then total far exceeds the planned 18,400 houses over 20 years.
Comment:

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 should be increased. 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.

Summary:

Settlement distribution. 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 should be increased. If new 'buffer' sites are identified (see previous comments re suggested requirement buffer) Carcroft/Skellow should be a priority.

Response:

This relies on the overall housing figure being increased. As per the methodology and settlement split set out in the Housing Topic Paper, Carcroft - Skellow's requirement is correctly calculated.
Marr Parish note that DMBC have increased their new job target from 20,000 to 27,100 in the Local Plan, for the next 15 years. We consider another 7,100 is quite a significant increase and represents an uplift of 35% in new jobs projected against a background of economic uncertainty. We consider such an increase is optimistic and agree (as previously stated) with DMBC that an annual review should be carried out, to ensure that the borough’s new job creation meets with its new homes targets.

**Response:**

The Council remains focussed on delivering jobs growth and economic enhancement for Doncaster. The Council monitors and will continue to monitor employment and housing development via the ELA and RLA.
Policy 4: Employment Allocations

Tests of Soundness: Positively prepared

Summary:
The employment requirement is largely made up of Site 001 and 941 (M18 J6 & RHADS Site 1) (Table 4). It is unclear how these spatially concentrated employment sites in peripheral areas away from town centres will meet future employment needs. It is disingenuous to say they are accessible via a range of transport modes when it will mainly be car. Allocating such road reliant sites is counter to the opportunities needed to combat climate change. Para 4.31 compounds this by associating the potential for employment growth in the north of the Borough to a putative A1-A19 link road, for which no proposals are actually shown, but if these proposals do emerge towards the end of the plan period then clearly that employment land would not come on-stream until much nearer to the 2050 date for the UK to achieve net zero carbon. In short, this is a 20th century economic vision based on Doncaster’s continuing obsession with building roads and peripheral employment sites, and it has no place in preparing the Borough for the realities of the mid 21st century that will be defined by how places respond to the challenges of climate change. PROPOSED CHANGE As we have consistently argued, Doncaster needs to provide evidence of how its economic growth ambitions are compatible with meeting future employment needs in a genuinely sustainable way. We are wholly unconvinced that a growth strategy focusing on road-based distribution and logistics is compatible with this, but if it is then the evidence must be provided to demonstrate it. Otherwise, the Plan is enabling a flawed growth strategy, and both must be revised. Specifically, we consider that the focus on a small number of very large, peripheral sites needs to be replaced with a much finer-grain approach addressing the skills and needs of different communities across the Borough, accompanied by a plan to de-carbonise the employment patterns of the Borough.

Response:
The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites. The responses to the Issues and Options Consultation highlighted that jobs/sites do not need to be located next to the people they serve. Also the market analysis of the sites/jobs requirements shows that there is a strong continued demand for large sites for logistics with the M18 corridor being the preferred location. The Employment Land Review (Colliers 2019) and Employment Land Need Assessment demonstrate this. The Local and its policies should be read as a whole as it considers the issue of climate change and resilience. It has also been subject to Sustainability Appraisal. For example, Policy 13 sets out improvements to the Strategic Transport Network (including public transport) which will ensure that employment sites can be accessed by all modes of transport.
Proposed Employment Allocations Site Ref: 001 Location: Junction 6 M18, Thorne Objection: Along with the other two employment allocations we object to below, these three sites comprise the bulk of the new employment allocation in the Plan. Not only is the largest of the three, it is also the most peripheral, and its motorway location maximizes the risk that new jobs at this location will not be focused on local need in Thorne & Moorends, and indeed may also detract from take-up of employment sites within the Unity regeneration scheme. The site represents a wholly outmoded, unsustainable approach of road-dependent employment growth to which we object in principle. PROPOSED CHANGE Delete the proposed allocations for the reasons shown in our table above.

Summary:
Site 001 - object - the largest and most peripheral of the employment allocations. Location next to motorway means there is more chance new jobs will not utilise local need and may also detract from the job take up at unity. Site represents outmoded and unsustainable approach of road dependent employment growth which CPRE object to in principle. Proposed change: delete the allocation

Response:
Noted. The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites. The responses to the Issues and Options Consultation highlighted that jobs/sites do not need to be located next to the people they serve. Also the market analysis of the sites/jobs requirements shows that there is a strong continued demand for large sites for logistics with the M18 corridor being the preferred location. The Employment Land Review (Colliers 2019) and Employment Land Need Assessment demonstrate this.
Comment Ref: C/Site 441/0077/6/032

Attend Examination: Attend Hearing

Reason: To assist the Inspector by using our submitted representations to answer his/her questions, particularly in light of the evidence submitted by other representors and any other matters the Inspector may raise.

Area: Chapter 4: Strategic Approach

Policy: Policy 4: Employment Allocations

Tests of Soundness: Positively prepared   Effective   Justified

Comment:
Proposed Employment Allocations Site Ref: 441 Location: Adwick Objection: Depends on the type of employment if it is to tackle local deprivation. PROPOSED CHANGE Delete the proposed allocations for the reasons shown in our table above.

Summary:
Site 441 - object - depends on type of employment and if it is to tackle local deprivation. Proposed change: delete the allocation

Response:
Noted. The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions.
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**Comment Ref:** C/Site 941/0077/6/033

**Attend Examination:** Attend Hearing

**Reason:** To assist the Inspector by using our submitted representations to answer his/her questions, particularly in light of the evidence submitted by other representors and any other matters the Inspector may raise.

**Area:** Chapter 4: Strategic Approach

**Policy:** Policy 4: Employment Allocations

**Tests of Soundness:**

- Positively prepared
- Effective
- Justified

**Comment:**

Proposed Employment Allocations Site Ref: 941 Location: Airport Objection: Would only be justifiable on basis of robust sustainability strategy with regard to new railway access and carbon reduction strategy. PROPOSED CHANGE Delete the proposed allocations for the reasons shown in our table above.

**Summary:**

Site 941 - object - Would only be justifiable on basis of robust sustainability strategy with regard to new railway access and carbon reduction strategy. Proposed change: delete the allocation.

**Response:**

Noted.
Comment:

4.1 The M18 motorway has been recognised for some time by Doncaster Council as an important location for distribution warehousing uses. The Council’s Core Strategy (adopted May 2012) identifies the need for new strategic warehousing allocations in the M18/M180 Corridor at junctions close to Armthorpe, Stainforth/Hatfield and Thorne. 4.2 The West Moor Park North Site has previously been assessed and allocated for a distribution employment site in earlier versions of the development plan for a number of years. 4.3 During the preparation of the Doncaster Sites and Policies DPD the Council consulted on, inter alia, new major distribution warehousing sites. In particular, further views were specifically sought on the Thorne North Site and the West Moor Park North Site for employment. 4.4 The Council advised that only one of these sites was required to be allocated in order to make up the then 290 hectares requirement for distribution warehousing set out in the Core Strategy. 4.5 However, when the Publication Version of the Sites and Policies DPD was issued the Council had decided to allocate both the Thorne North Site and the West Moor Park North Site for distribution warehousing. 4.6 A Report to Full Council on 7 March 2013 regarding the Sites and Policies DPD set out key changes to the housing and employment sites. In relation to the allocation of the Thorne North Site and the West Moor Park North Site the Report states: “To ensure that we have sufficient employment land, make the best of Doncaster’s assets and provide some flexibility, it is proposed to allocate both Thorne North and North of West Moor Park, alongside DN7 (but not Bradholme). This would provide additional light industry and manufacturing, and additional distribution warehousing, compared with just allocating North of West Moor Park...” 4.7 It is therefore clear from this statement that the West Moor Park North Site would have been the Council’s preferred site in the event that only one site was to be allocated in the Sites and Policies DPD. 4.8 However, notwithstanding the above, the Sites and Policies DPD was subsequently withdrawn because the Inspector had fundamental concerns with the Plan relating primarily to housing issues. The Inspector did briefly address distribution warehousing issues in his report and although he noted an over-allocation of employment sites, he was not persuaded that the approach was inherently unsound. In other words, a plan with both sites allocated for employment would be sound.

Summary:

The M18 has been recognised for a while as an important location for distribution warehousing and this is reflected in the Core Strategy. West Moor Park North was previously assessed and allocated for a distribution employment site in earlier versions of the plan. During the preparation of the Sites and Policies DPD both Thorne North and West Moor Park North were allocated. Although the Site and Policies DPD was withdrawn, the Inspector noted that there was an over-allocation of employment sites but did not consider the approach unsound.

Response:

Noted
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5.7 The Thorne North Site (73 ha) has now been allocated for employment in the Publication Draft Local Plan but we do not consider that this represents the most appropriate strategy when taking into account the reasonable alternatives. 5.8 The Thorne North Site was not allocated in the previous consultation document (Draft Policies and Proposed Sites) in October 2018 and it has been the subject of a pending planning application for the last 3 years which has still not been resolved (see paragraphs 6.14 to 6.20 below). 5.9 The Thorne North Site was previously rejected as an employment site in the Draft Policies and Proposed Sites document for the following reason: “Although there are successful existing industrial estates to the north of Thorne which this site could complement and there is an outline planning application pending, there are concerns over the site’s deliverability as there are more deliverable sites elsewhere.” 5.10 Furthermore, the Thorne North Site scores similarly to other sites through the Sustainability Process and it is not therefore clear why this site has now suddenly been chosen for allocation in the Publication Draft over the other potential sites (and in particular over the West Moor Park North Site). Further details regarding the deliverability and attractiveness of the Thorne North Site to the market are therefore set out in section 6 below. 5.11 In addition, land at Carcroft Common (site reference 441) (49 ha) is also allocated for employment in the Publication Draft Local Plan. We acknowledge that this site was previously suggested as an employment allocation in the Draft Policies and Proposed Sites document in October 2018 but we consider that it is not attractive to the market, has infrastructure constraints and is not deliverable. Further details regarding the Carcroft Common site are therefore set out in section 7 below.

Summary:
The Thorne North site does not represent the most appropriate strategy. It was not allocated in the Draft Policies and Proposed Sites and it has been the subject of a pending planning application for the last 3 years. It was also rejected in the Draft Policies and Proposed Sites document. The site scores similarly to the other sites through the Sustainability process and it is not clear why this site has now been chosen for allocation. In addition, land at Carcroft Common (ref 441) is also allocated for employment in the Publication Draft Local Plan. It was suggested as an allocation in the Draft Policies and Proposed Sites document but we consider that it is not attractive to the market, it has infrastructure constraints and is not deliverable.

Response:
Noted. The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites.
Comment Ref: C/Site 001 - Change/01191/1/014

Attend Examination: Attend Hearing

Reason: TO BE ABLE TO PARTICIPATE IN THE DEBATE REGARDING STRATEGY, NEED, SUPPLY AND DISTRIBUTION OF EMPLOYMENT SITES

Area: Chapter 4: Strategic Approach

Policy: Policy 4: Employment Allocations

Tests of Soundness:

Comment:

8.1 Having regard to the objections set out above, we consider that the following amendments are required to the Publication Draft Local Plan: - the deletion of the employment allocation for the Thorne North Site (site reference 001) from the Local Plan

Summary:

Thorne North (ref 001) should be deleted from the Local Plan

Response:

Noted. The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions.
## Tests of Soundness:

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### Summary:

**Thorne North Site (Site Reference 001) - Flood Risk**  
6.6 The issue of flood risk is of fundamental importance to the Council in terms of allocating the Thorne North Site in the Local Plan.  
6.7 The 'Housing & Employment Site Selection Methodology & Results Report’ makes it clear that the Thorne North Site fails the sequential test because it is located within Flood Zone 3 but that this is the same as all the potential employment sites within the M18 corridor.  
6.8 West Moor Holdings has previously commissioned a report by Weetwood to provide a preliminary assessment on flood risk on both the Thorne North Site and the West Moor Park North Site and this was submitted to the Council at an earlier stage of the development plan process.  
6.9 The Weetwood report demonstrates that in flooding terms the West Moor Park North Site would be the preferred site for distribution warehousing. It is clear that the likelihood and consequence of flooding is significantly higher for the Thorne North Site than the West Moor Park North Site. In particular, the River Don (which runs adjacent to the Thorne North Site) has a long history of flooding (as detailed in the Council's Strategic Flood Risk Assessment) and the Thorne North Site itself has previously flooded. However, the West Moor Park North Site has no history of flooding.  
6.10 In relation to the West Moor Park North Site the Weetwood report advises that according to the Environment Agency (EA) flood map the majority of the West Moor Park North Site is within Flood Zone 3. The EA flood map was updated with new outlines in 2012 which resulted in the reclassification of the West Moor Park North Site from Flood Zone 2 to Flood Zone 3.  
6.11 Mr Philip Sale (EA Modelling and Hydrology, EA Nottingham) advised that the current flood outlines in the vicinity of Armthorpe are based on an EA modelling study completed in March 2011 as part of the Isle of Axholme Flood Risk Management Strategy. By way of an email dated 8 February 2012, Mr Sale states: "Armthorpe lies well outside the current 1 in 1000 year breach extent from the Tidal Trent Strategy Modelling (Black and Veatch, 2005). However, the strategy scale modelling done as part of the Isle of Axholme study shows the 1 in 100 (fluvial) and 1 in 200 year (tidal) outlines without the presence of defences for the Tidal Trent, Torne and Idle, inundate the south-eastern portion of Armthorpe."  
6.12 The Weetwood report therefore advises that on this basis the site would only be at risk of flooding should an extreme flood occur and no flood defences were present (which they are). The flood outline can therefore be regarded as very precautionary.  
6.13 In addition, the Weetwood report advises that the West Moor Park North Site has no history of flooding, despite being located within Flood Zone 3. The nearest flooding that occurred in the worst flooding in recent history (June 2007) was 4 km north-west of the site.

### Response:

**Site 001 (Thorne North) is flood zone 3 (High Risk)** as is Site 013 (West Moor Park North) 001 'benefits from flood defences' (EA data) site 013 does not (see table 7.27 SA Report, Wood 2019). For potential development in flood risk areas see Policy 58 'Flood Risk Management’. In the site assessment and selection process all of the remaining options for sites without planning permission in the M18 corridor (and part M180) are in Flood Zone 3.
Comment:
Thorne North Site (Site Reference 001) - Attractiveness to the Market 6.1 Paragraph 4.27 of the Publication Draft Local Plan states that the distribution of employment sites is required in market attractive locations but also ensuring that there is strong accessibility and connectivity between where people live and the employment opportunities. 6.2 The Thorne North Site is located off Junction 6 of the M18, to the north east of Doncaster. Whilst the site is well located for immediate access to the motorway network the majority of demand, from large scale occupiers, is for sites to the south and east of Doncaster, at Junctions 3 and 4 of the M18 with easier communications to the A1(M) and to the M1 motorways. 6.3 Sites at Junctions 3 and 4 of the M18 are ideally located for companies looking to import goods via the ports of Immingham and Grimsby, through the M180 corridor and onto the M18 corridor. These Junctions are preferred as they are ideal for the bulk break of goods for onward distribution to other UK locations. From Junction 3 of the M18 some 80% of the UK population can be reached in a 4-hour HGV journey. The additional distance, along the M18 to Junction 6, clearly reduces the percentage of population within a 4-hour HGV journey. 6.4 It is acknowledged that there are already two large scale units at Junction 6. These are Omega Kitchens and The Range. However, Omega Kitchens is a locally owned business and the original factory has been expanded over a period of years. With regard to The Range, this business occupies a unit of 750,000 sq ft at this Junction. However, this unit was speculatively developed in the mid 2000s and at that time there were few other options for large scale development in the Doncaster area. The unit was originally let to MFI and the lease was guaranteed by DHL. When MFI went into administration the lease passed to DHL and they stored goods for a range of customers in the unit. However, most of the space (some 400,000 sq ft) was used for goods on behalf of The Range. Therefore, when DHL exercised their break clause The Range was unable to identify suitable space to relocate their goods to and took a new lease direct from the Landlord. 6.5 In view of the fact that there are now more established developments with existing public transport links and wider access to labour located at Junctions 3 and 4 of the M18 motorway, the Thorne North Site will always be considered by most occupiers as being in a secondary location.

Summary:
Thorne North - attractiveness to the market Paragraph 4.27 of the Publication Draft Local Plan says that sites are required in market attractive locations with strong accessibility and connectivity between where people live and the employment opportunities. Thorne North is located off Junction 6 of the M18 to the north east of Doncaster and whilst it is located for immediate access to the motorway, the majority of demand is for sites to the south and east of Doncaster (Junctions 3 and 4 of the M18). These junctions are preferred as they are ideal for the bulk break of goods for onward distribution to other UK locations from the ports of Immingham and Grimsby. It is acknowledged that there are two large scale units at Junction 6. However one is a local business and the other was speculatively developed in the mid 2000s. Thorne North will always be considered by most occupiers as being in a secondary location.

Response:
Please see the Colliers Report site assessment (Doncaster Employment Land Review Oct 2018) for the latest independent analysis. As at November 2019 a major developer is involved in and is promoting the site.
Tests of Soundness:

**Comment:**

Thorne North Site (Site Reference 001) - Planning Application  6.14 An outline application for proposed employment development consisting of warehousing, distribution and light manufacturing units and associated service roads, parking areas, landscaping and pedestrian and cycle ways was submitted to the Council in August 2016 (ref: 16/02136/OUTM) in relation to the Thorne North Site. This replaced a previous planning application (ref: 15/02252/OUTM) which was withdrawn.  6.15 The current application is therefore still pending some 3 years after its submission.  6.16 There have been numerous objections to the scheme from both local residents and statutory consultees but still the application has not been refused.  6.17 Highways England originally objected to the application on 27 September 2016 and recommended that planning permission not be granted for a period of 6 months in order to allow for the outstanding issues to be resolved. These various issues were listed in the consultation response. We understand that the developer had already addressed a number of comments in relation to the previous application relating to the sustainable credentials of the site but nevertheless there remained a long list of highway issues to be resolved.  6.18 Since Highway England's original consultation response in September 2016 a number of other 'holding directions' have been issued by Highways England on 24 March 2017, 19 September 2017, 15 March 2018, 3 September 2018, 27 February 2019 and most recently on 22 August 2019. All these responses recommend that planning permission is not granted for a further period of 6 months as the applicant is still trying to resolve outstanding matters and agree appropriate solutions for the strategic road network.  6.19 It is unclear what the outstanding issues are but Highways England has still not confirmed that it has no objection to the proposed development. The deliverability of the site in terms of highways and its impact on the strategic road network is therefore not confirmed and cannot be regarded as a sound basis for an allocation.  6.20 We do not therefore consider that the allocation of the Thorne North Site for employment is justified when taking account of the reasonable alternatives. Consequently, the allocation of the Thorne North Site is unsound and should be deleted from the Local Plan.

**Summary:**

Thorne North - planning application  An outline planning application was submitted to the Council in August 2016. It is still pending consideration. There have been numerous objections to the scheme from residents and statutory consultees. Highways England originally objected in September 2016 and recommended that permission should not be granted for 6 months for outstanding issues to be resolved. Some issues have been resolved but others have not. Six other holding objections have been issued by Highways England since 2017. Highways England has still not confirmed that it has no objection to the proposed development. The deliverability of the site in terms of highways and its impact on the strategic road network is not confirmed and cannot be regarded as a sound basis for an allocation. The allocation of Thorne North is unsound and should be deleted from the Local Plan.

**Response:**

Planning Application ref 16/02136/OUTM is currently pending decision. Highways England are a statutory consultee for major planning applications and any comments they make are considered and addressed through the decision making process.
Tests of Soundness:

Comment:
Changes required to the Publication Draft Local Plan - 013 - the allocation of the West Moor Park North Site (site reference 013) for employment under Policy E4 of the Local Plan

Summary:
West Moor Park North (ref 013) should be allocated for employment.

Response:
The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions.
Omission of West Moor Park North Site (Site Reference 013)  5.12 As stated above, the West Moor Park North Site was previously allocated as a distribution employment site in earlier versions of the development plan but the Publication Draft does not include this Site as an employment allocation.  5.13 The 'Housing & Employment Site Selection Methodology & Results Report' (June 2019) acknowledges that it is recognised that the West Moor Park North Site could build upon the success of the existing West Moor Park to the south. However, the reason stated for the site being rejected is: "The allocation of the site would exceed the supply of employment land for this plan period. Sites other than this one have been chosen for allocation in order to provide a balanced distribution of employment land across the Borough."  5.14 The West Moor Park North Site has excellent, direct access to Junction 4 of the M18 and lies immediately to the west of the motorway. The site also benefits from an existing spur from a roundabout on the A630 West Moor Link Road which provides direct access to the site. Access into the West Moor Park North Site from the motorway is much quicker and direct than access into the Thorne North Site.  5.15 The West Moor Park North Site also occupies a high-profile location being situated immediately to the north of the existing West Moor Park employment site. West Moor Park is a very successful employment area (with occupiers such as Ikea, Next and Fellowes) which had a very quick take-up rate. The location is clearly attractive to occupiers and the allocation of the West Moor Park North Site for employment would provide an opportunity to build on this success.  5.16 The West Moor Park North Site is also much better related to a larger population of Doncaster than the Thorne North Site and should be afforded greater weight on this basis. Furthermore, the Thorne North Site is actually separated from the Principal Town of Thorne by the M18 motorway and such an employment allocation would be better placed to the east of the M18 so that it would be better related to the existing town of Thorne and the existing employment sites.  5.17 The West Moor Park North Site is deliverable and considerably more attractive to the market than any of the alternative sites. Accordingly, we consider that the West Moor Park North Site should be allocated for employment in the Local Plan in preference to the Thorne North Site and/or the Carcroft Common Site.

Summary:
The West Moor Park site (ref 013) was previously allocated in earlier versions of the development plan but not in the Publication Draft. The Housing & Employment Site Selection Methodology & Results Report acknowledges that the site could build on the success of the existing West Moor Park to the south but the reason for rejecting the site is: "The allocation of the site would exceed the supply of employment land for this plan period. Sites other than this one have been chosen for allocation in order to provide a balanced distribution of employment land across the Borough." West Moor Park North has excellent direct access to Junction 4 of the M18 and lies immediately to the west of the M18. It benefits from an existing spur from the roundabout on the A630 West Moor Link Road. Access onto the site from the motorway is much quicker and direct than access into the Thorne North site. West Moor Park North also occupies a high-profile location to the north of the existing, very successful West Moor Park employment site. The location is attractive to occupiers and West Moor Park North would build upon this success. It is also much better related to a larger population than Thorne North and should be afforded greater weight on this basis. Thorne North is separated from Thorne by the motorway and an employment allocation would be better placed to the east of the M18 so it is better related to Thorne. West Moor Park North is deliverable and more attractive to the market than any of the alternative sites. It should be allocated in preference to Thorne North and/or Carcroft Common.

Response:
Comments noted.
Tests of Soundness:

Comment:
Changes required to the Publication Draft Local Plan - 441 - the deletion of the employment allocation for the Carcroft Common Site (site reference 441) from the Local Plan

Summary:
Carcroft Common (ref 441) should be deleted from the Plan

Response:
The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions.
Land at Carcroft Common, Carcroft (Site Reference 441)  

7.1 The 'Housing & Employment Site Selection Methodology & Results Report' states that land at Carcroft Common (referred to in previous local plan documents as the Bentley Moor Lane Site) is proposed for allocation for the following reasons: "As with all the potential sites, this site fails the flood risk sequential test as it is within Flood Zone 3. It scores similarly to the other sites through the Sustainability Appraisal process. It is a reserve employment site within the Unitary Development Plan and is therefore not within the Green Belt. There is a requirement for the development to incorporate flood mitigation measures. There is a wider aspiration for the construction of a Trans-Pennine link from Manchester to Hull which this site will benefit from. The construction of the A1M to A19 link road will also form part of that new link. The site is within an area of high deprivation and job opportunities on this site would be greatly beneficial to the north of the borough. It will also help to re-address the balance of private sector investment which has been spent in the south of the borough. Due to the current infrastructure constraints it is considered that approximately 25% of the site (12 ha) would come forward before the end of the plan period. The majority of development will be for B8 and some for B2 (70/30% split)."  

7.2 The Carcroft Common Site is therefore comparable to the West Moor Park North Site in terms of flood risk and scoring through the Sustainability Process. However, it is very unattractive to the market and significantly less attractive than the West Moor Park North Site.  

7.3 The Publication Draft Local Plan recognises that this site clearly has significant infrastructure constraints. Whilst it is located on the A19 there is no obvious route across the A1(M). The Publication Draft Local Plan suggests that there is a wider aspiration for the construction of a Trans-Pennine link from Manchester to Hull and the development of this site would benefit from and support the construction of the A1(M) to A19 link road which will form part of that new link.  

7.4 The Carcroft Common Site is therefore dependent upon the A1/A19 Link Road and the Publication Draft Local Plan recognises this constraint on infrastructure by only envisaging 12 hectares (25% of the site) coming forward during the plan period. Given the type and nature of the large-scale users in the Borough, a site of this size would not be sufficient or attractive. The Council has clearly had an obligation to try and promote sites in the north of the Borough and that is the reason why this site (and the Thorne North Site) has been put forward. However, the Carcroft Common Site is far removed from the motorway and would be more attractive to local companies rather than large users.  

7.5 Notwithstanding the above, the Publication Draft Local Plan suggests that the majority of development will be for B8 with some for B2 (70/30% split). In comparison with West Moor Park North Site this seems a completely inappropriate area for B8 development.  

7.6 We do not therefore consider that the Carcroft Common Site is deliverable and consequently its allocation in the Local Plan is unsound and should be deleted.

Summary:  

Land at Carcroft Common  

The Carcroft Common site is comparable to West Moor Park North in terms of flood risk and scoring through the Sustainability Process. However it is very unattractive to the market and significantly less attractive than West Moor Park North. The Publication Draft Plan recognises that Carcroft Common has significant infrastructure constraints. It is located in the A19 but there is no obvious route across the A1(M). Carcroft Common is dependent upon the A1/A19 Link Road and the Publication Draft Plan recognises this constraint by envisaging 12 ha (25% of the site) coming forward during the plan period. A site of this size is not sufficient or attractive for large scale uses. The Council clearly has an obligation to try and promote sites in the north. However the Carcroft Common site is far removed from the motorway and would be more attractive to local companies. Carcroft Common is deliverable and its allocation is unsound.

Response:  

The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions.
Test of Soundness:

Comment:

2. Thorne Moorends Town Council is aware that there are local residents fiercely opposed to development on Selby Road, Thorne on the site now included as site 001. The Council asks that Doncaster Council ensure that they have given due regard for the views and opinions of those local residents. 3. The Selby Road site is a large site and must be carefully developed with a range of appropriate mitigation measures incorporated to minimise the negative impacts of such a development on the surrounding area. The Council does however support and welcome economic growth in the area.

Summary:

Site 001 - Thorne North. 1. The Town Council asks that “Doncaster Council ensure that they have given due regard for the views and opinions of those local residents” 2. Site 001 should be carefully developed to minimize and negative impacts on the surrounding area.

Response:

Noted. Consultation is undertaken at various stages in the Local Plan process and responses play an important role in the decisions made. Site allocations have been made following extensive site assessment and consultation. The sites proposed for allocation have been identified as the most appropriate to meet the job requirement.
<table>
<thead>
<tr>
<th>Comment Ref:</th>
<th>C/Site 160: Bradholme Farm/01484/10/002</th>
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<tr>
<td>Attend Examination:</td>
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<tr>
<td>Area:</td>
<td>Chapter 4: Strategic Approach</td>
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<td>Policy:</td>
<td>Policy 4: Employment Allocations</td>
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<td>Tests of Soundness:</td>
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<tr>
<td>Comment:</td>
<td>1. The Council notes that Bradholme Farm as a site for employment allocation has now been excluded from the draft Local Plan. Thorne Moorends Town Council stands by its position set out in its October 2018 consultation response in relation to Bradholme Farm.</td>
</tr>
<tr>
<td>Summary:</td>
<td>Site 160 Bradholme. o Supports decision not to allocate this site (as per comments made in 2018 consultation).</td>
</tr>
<tr>
<td>Response:</td>
<td>Support noted.</td>
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I object very strongly to the proposed allocation of Site 001 Thorne North Junction 6 M18 for employment land following the rejection of Thorne South Urban Extension 160 Bradholme and there is no evidence that the residents of Thorne and Moorends desire that that further housing and warehouses are developed here in high risk flood zone land and it is myth to presume otherwise so I have included comments re the Thorne Moorsends Town Council and Thorne Moorsends Neighbourhood Plan, both of which suggest local residents want developments in this high flood zone area. Today 30th September 2019 Thorne is again on a Flood Alert as the Environment Agency have issued 'Flood Alert : Be prepared'. This is due to the high tide effecting the River Don. The river Don has water levels reaching level with the top of its flood defence banks nowadays although this used to be a rare occurrence it is happening more frequently due to climate change. I am very concerned that the allocation of Site 001 Thorne North Junction 6 M18 will lead to the allocation of housing sites west of Moorsends and west of Thorne adjacent to the railway line. This land is also high risk flood zone 3. I believe it is not the wishes of Thorne and Moorsends residents to have further new housing development here or to have additional huge ugly storage warehouses where employment jobs in this industry are very low due to the automated nature of this particular type of employment. Thorne Moorsends Neighbourhood Development Plan : Location Justification of new housing sites and location of new employment site 'Thorne North Site 001 Junction 6 M18' can be found perhaps in the Thorne Moorsends Neighbourhood Plan Policy E2 : Development of Non-Neighbourhood Plan Allocated Employment Sites. This Policy states that it will support the Local Plan in new Employment Sites along the M18. NP Policy E2 Justification 3.26 Layout of the development must be central to Moorsends and Thorne. The Thorne Moorsends Neighbourhood Plan Group undertook two formal Public Consultations in 2014 by use of Questionnaire but there was no evidence of public support for the development of Thorne North Site 001 Junction 6 M18 according to the Consultation Summaries that were analysed from them and sent to me by Jeremy Sherlock Town Clerk at that time, now retired. Housing sites in Thorne Moorsends Neighbourhood Plan Policy H2 : Development of Non-Neighbourhood Plan Allocated Housing Sites. This Policy states that the allocation of the sites is the responsibility of DMBC but the location of the sites is Policy H2 : Justification 3.9 new housing sites to be west of Thorne and Moorsends adjacent to the railway line. The Thorne Moorsends Neighbourhood Plan Group undertook two formal Public Consultations in 2014 by use of Questionnaire which consultation summaries show evidence that as many local residents object to new housing development west of Thorne and west of Moorsends adjacent to the railway line as those who support it. Thorne Moorsends Town Council : Doncaster Local Plans Consultation Response Doncaster Local Plan Homes and Settlements March 2016 The above named Consultation ran from 7th March to 18th April 2106 and set out the proposed number of new houses that the Council were planning and where they were to be distributed around the boroughs townships and villages. The Homes and Settlements Document March 2016 included paragraph 43 which related to new housing in the Thorne and Moorsends area. See following taken from the document:- 43. Thorne and Moorsends are heavily constrained by flood risk and the Neighbourhood Plan being prepared is not including urban extension allocations because of the stringent tests necessary to justify development in flood risk areas. Not withstanding an otherwise strong case for more housing it is difficult to justify allocating any of the economic-led housing growth here consistent with the national policy requirement for applying a sequential test approach to flood risk. Allocations are therefore likely to deliver Thorne and Moorsends local housing needs only. The Doncaster Local Plan Home and Settlements Document March 2016 and its Consultation was discussed by Cllrs at the Thorne Moorsends Town Council meeting of the 12th April 2016 and recorded in the Minutes. DMBC Local Plans Manager attended and gave a presentation on the Homes and Settlements Consultation. The Clerk Jeremy Sherlock, made comments in respect of Paragraph 43 of the document as below:- "The Town Council are deeply concerned that comments in para 43 if followed through will lead to a much lower level of allocation and act as a brake to the growth and development of Thorne and Moorsends" Cllrs recorded in the Minutes of this meeting as being present were:- [Redacted Text] Cllrs Joe and Carol Blackham, Susan Durant and Annie Jones. Cllr Mark Houlbrook, Janet Philips, R Porter, R Turner and M Henessy. The Doncaster Local Plans Homes and Settlements Consultation 7th March-18th April 2016 resulted in 157 letters of response being received making 268 specific points. 14 of these were from Town and Parish Councils, 29 from agents representing landowners and developers and 67 from individuals/residents and 5 from neighbouring authorities. Of interest out of the 67 letters from individuals/residents 43 of them concerned only one area of the Borough which was the Thorne Moorsends area and their concern was that the flood risk to Thorne Moorsends area as portrayed in para 43 of the document would inhibit growth in Thorne and Moorsends, that the sequential test was not applied throughout the borough and a solution must be found so development could go ahead despite high flood risk. The 43 individuals names and comments that were concerned with the Thorne Moorsends area were recorded in the following Document and are named as below:- Summary of Responses to the Consultation on the Homes and Settlements Strategy Paper held 7th March-18th April 2016 [Redacted Text - SUMMARY: The Objector believes that 38 of the respondents were connected and that some names were misspelt.] This is therefore not a true representation of the views of local residents of Thorne and Moorsends and is unfair. Mr Allen, the Chief Executive of Doncaster Council has been made aware of this and has told me historical issues will not be dealt with. Doncaster Local Plan Draft Plan and Proposed Policies Consultation Consultation 2018. Summary of responses received and Dmbc responses. Page 3 Housing Growth at Thorne and Moorsends -43 x individual responses (including Thorne Moorsends Neighbourhood Plan Group) to the Consultation objecting to the emerging Local Plan and its Policy approach to future housing development at Thorne and Moorsends. In summary the comments were that avoidance of flood risk was not a reason to curtail future growth and much needed regeneration in the area as flood risk is something that can be mitigated rather than avoided. Again the number of individuals in the above reference is '43' who also appear to be objecting similarly to para
**Agenda item Number 18:** Local Plan Consultation, update on Consultation and Consideration of implications. 20 members of the public were recorded as being present at this meeting and the following was recorded in the minutes:

3297  A brief outline of the stages of the Neighbourhood Plan was given. One Cllr said he knew how detrimental to the environment the Bradholme development would be and that a letter of objection would be sent by the Neighbourhood Plan Steering Group. Cllrs said objections had been listened to and that TMTC would not hesitate in objecting to the development. Members of the public were urged to put their complaints into writing and send them on to Doncaster MBC. It is notable that only a brief outline of the stages of the NP was given to the public. The Cllrs did not inform the members of the public present that if Site 160 Bradholme was rejected as a result of the Local Plan Consultation then Site 001 Thorne North Junction 6 M18, the potential employment reserve site, would automatically be allocated in place of the Bradholme Site 160. The development of Site 001 with its large greenfield site of 183 acres in Countryside Policy area would also be very detrimental to the environment for the same reasons as the Bradholme site 160. Cllrs did not inform members of the public present that the development of Site 001 Thorne North Junction 6 M18 would be of much greater benefit to landowners in Thorne and Moorends who own land west of Thorne and west of Moorends adjacent to the railway line because this site was much nearer to their land than the Bradholme Site 160 which is South of Thorne. Among the landowners with housing sites west of Thorne and west of Moorends adjacent to the railway line include the following: Cllrs Joe and Carol Blackham housing Site 469 ie major planning application 18/02496/OUTM which Doncaster Council Planning authority acknowledged receipt of on the 8th Oct 2018, Donald Parkinson (also applicant and landowner of Site 001 Junction 6 M18 pending major planning application 16/02136/OUTM) for Housing Sites 002,003,004 and 005. Mark Blackham for Housing Site 009, and the William Brookes Trust Foundation Site 343 DMB. Cllrs did not inform the public present that there is no reference anywhere in the Thorne Moorends Neighbourhood Plan to Site 160 Bradholme (Thorne South Urban Extension Site 160) or Policy even that names this site or objects to it. Andrew Wood CPRE comment in the Doncaster Local Plan Consultation stated the following:- 160 Bradholme Thorne Moorends Neighbourhood Plan make no reference to a major urban extension. What is envisaged? The day after the Thorne Moorends Town Council Meeting the Thorne Times dated October 10th 2018 had the front page banner catching headline as being a report of the meeting:- Cllrs Vote Unanimously to Oppose Proposals …..following discussions by Thorne Moorends Town Cllrs at their October meeting Members voted unanimously to oppose the Proposals for the Doncaster Local Plan with the Town Mayor Susan Durant urging residents to respond to the consultation and submit objections. Cllr Joe Blackham said he supported a “total rejection” of the Bradholme Proposals for the Doncaster Local Plan adding “it was imperative that people put in objections” Cllr Blackham said “that the Proposals bore no resemblance to the Thorne Moorends neighbourhood Plan” saying it was “exactly the opposite”. Following the Doncaster Local Plan Consultation 2018 the Bradholme Site 160 was rejected and Site 001 Thorne North Junction 6 M18 has been proposed for employment allocation in its place. Cllrs Joe Blackham [Redacted Text] Cllr Susan Durant had been very effective in their urging of residents to object to Site 160 Bradholme, by using their positions as Cllrs and members of the Thorne Moorends Neighbourhood Plan Working Group and by use of the Thorne Times. Some Doncaster Local Plan Consultation responses 2018 seem confused see below for example :- ref 04953 Andrew Mattholie Objection to Site 160 .Proposal does not fit with the wishes of the residents of Thorne and Moorends as expressed in the Thorne Moors Neighbourhood Plan. ”No justification for development on greenfield sites” There is nothing in the Thorne Moorends Neighbourhood Plan that supports no justification for development on greenfield sites. Thorne Moorends Town Council Meeting held on the 10th September 2019 also had on its Agenda the Doncaster Local Plan as below Agenda item : Local Plan , to consider and respond to Local Plan Consultation. I was a member of the public present at that meeting and heard Cllr Joe Blackham make a verbal declaration of interest in the Doncaster Local Plan item without giving reason and I saw Cllr Joe Blackham leave the room when the Doncaster Local Plan was discussed by the Cllrs present at the meeting. Of note the Doncaster Council Minutes of the meeting of its council dated 25th September 2019 recorded the following:- 22.Declarations of Interest Cllr Joe Blackham declared a Discloseable Pecuniary Interest in Agenda item No 11/Publication (Reg 19) of the Doncaster Local Plan 2015-35 by virtue of a live planning application for planning permission in respect of land he owned in the Borough and took no part in the discussion at the meeting and vacated the Chamber during consideration thereof. I have asked Mr Allen Chief Executive of Doncaster Council why Cllr Joe and Carol Blackham did not have to make any declarations of interest at the Thorne Moorends Town Council meeting of the 9th October 2018 when the following was recorded in the Agenda:- Agenda Number 18 : Local Plan Consultation .Update on Consultation and Consideration of implications. Both Cllrs participated in the discussions on the Local Plan Consultation and both Cllrs voted to object strongly to the Local Plan which included opposition to Site 160. I have received no response from Mr Allen to my email date 19th Sep 19 concerning this. The Thorne Moorends Neighbourhood Plan Group Response to the Doncaster Local Plan Consultation was dated 26th October 2018. It included the following:- Furthermore the Working Group wishes to add that the proposed Bradholme Site for employment would represent a real loss to the ecological heritage of the area We refer Doncaster Council to the book by Martin Taylor entitled ‘Thorne Mere’ which describes the important historical heritage of the area (see image below) (the image is the book cover.) The Thorne Moorends Neighbourhood Plan Working Group Minutes of meeting dated 22nd October 2018 Members recorded as being present at this meeting are named as below:- Cllrs Joe Blackham, Susan Durant, Mark Houlbrook and Janet Philips. Rachel Durant, Caroline Robinson, Ann Pennington and the Town Clarke Matthew Gleadell. The following is recorded in the minutes of this meeting:- 4. DMB Local Plan : Bradford Farm The Group reviewed the response to the Local Plan Consultation submitted by the Town Council The Group was happy to adopt the Council’s response and support it but also add that as a Group it is intending to investigate Housing need with a view to Flood Zone 3 allocations as well as adding additional weight based on environmental impact on Thorne Mere and the loss of environmental history due to the site being the former River Don. (Of note Cllr Joe Blackham’s major planning application 18/02496/OUTM is in Flood Zone 3.) Kim Parkinson, landowner of Site 001 Thorne North Junction 6 M18 also made a similar comment to the Thorne Moorends Neighbourhood Plan Working Group in relation to Site 160 and the Thorne Mere in his response to the Doncaster Local Plan Consultation 2018 in respect of Site 160 See below:- Ref 0204 Kim Parkinson …Could be significant archaeology on site -Thorne Mere is a very important site. Thorne Moorends Town Clerk Matthew Gleadell sent my neighbour and I an email stating that the Hatfield Chase and Landscape Partnership had asked for Thorne MoorMoornds Town Council’s support in trying to oppose the Bradholme Site in the Local Plan. Paul Schofield when consulted stated that this was untrue. It appeared that the Clerk had been confused and misled by the bold print of Kim Parkinsons official looking email after being copied into Susan Durants email as below:- From Susan Durant 13th Oct 2018 To Kim Parkinson cc info@ywft.org.uk
Options of sustainable travel are hugely desirable in new Moorends Town Travel Lodge hotel on Omega Boulevard Capitol Park (both had extant planning applications so did not require Air Quality Assessments). Planning application 15/03006/OUTM (for Aldi Supermarket, H&M Supermarket and Garden Centre, MacDonalds Drive Thru restaurant Development for Doncaster Council stated in his email dated 4th Jan’18 that major planning application 16/00126/OUTM and also quite low. There remains some limited potential for cycle access. Unfortunately even the cycle access is poor as DMBC Transport does not possess the characteristics that make it accessible by sustainable modes and access other than by private transport developments to reduce their impact on the road network and reduce pollution. It is apparent from the Transport Statement that No Air Quality Assessment was undertaken by the developers. Where did the money go that was intended for footway and rail crossing improvements? No Air Quality Assessment was undertaken by the developers. There are no sustainable modes of transport to this site and 1. Rail connection investigation to transport by rail rather than on road network abandoned by Helios as there is attention in CPRE, Yorkshire Wildlife Trust, English Heritage, Historic England and Country Park area land comprising of 183 acres of undisturbed prime agricultural land closely alongside the tidal lower River Don in high risk flood zone 3 and is therefore not an appropriate site for development. This large greenfield site should continue to act as a flood plain in event of flood defence bank breach or pump failure. The dry drains that transit this area to the much endangered water vole and the site itself is within 3km of Thorne Moors which is the foraging site of the nightjar. It is also excellent soil for growing wide variety of crops and I am neighbour to this site with land of Agricultural Land Classification Grade 2 which is classed as the best and most versatile reason likely being that silt has been deposited on the land close to the river Don as it flooded over the centuries when the land acted as a flood plain prior to the bank being put in place, and it has resulted in enriching the soil. It would be unforgivable to sink huge warehouses on it and cover it with tarmac so forever polluted. The applicant has ‘evaded undertaking a required soil survey’ on this land. Site 001 is listed in the Priority Habitats Inventory as Low Floodplain Grazing Marsh which encompasses most of the 183 acre site. Sustainable modes of travel to Site 001 are poor. The route from Thorne is along the A614 a dangerous road with blind bends and national speed level of 60 mph. Pedestrians from Thorne would have to cross over motorway slip roads and there is no traffic free shared cycle/pedestrian route from the site to Thorne or to Thorne North Rail Station. The bus routes do not run near the site. From Moorends the route to the site is unsustainable as North Common Road has no footways, has national speed level of 60 mph, is a dangerous road with speeding issues, has deep drains at either side. To access sites from Mount Pleasant Road from Moorends then unmanned public rail crossing is involved and this Road beyond Nimbus Park 1 has a national speed limit of 60mph no footways or cycle paths and a dangerous blind bend. Thorne already has enough of Storage Distribution Warehousing which is totally dependent on highly polluting Heavy Goods Vehicles. North of Thorne has an established area of poor air quality which has to be monitored frequently and any added warehousing development in this area will worsen air quality and likely tip Thorne into another of Doncaster’s Air Quality Management Areas. Warehousing located north of Thorne Most of the large warehouses in this area are at Capitol Park Omega Boulevard. This substantial area of warehousing north of Thorne is well established and out of the way and close to the M18 Junction 6. Local residents of Thorne and Moorends selected Capitol Park as a suitable site for employment along with Coulman Road and the pit at Moorends in the Thorne Moorends Neighbourhood Plan 2 Formal Consultations undertaken in 2014 by use of Questionnaire and not Site 001 Thorne Noth Junction 6 M18. 3 further distribution and storage warehouses north of Thorne are along Mount Pleasant Road built on a 60 acre greenfield site and named as Nimbus Park 1 and 2. Nimbus Park 1 was the first development completed and has the huge ugly out of place giant warehouse currently rented out to the Range Company. I have learnt it has vast unused Office space. Nimbus Park 2 has two huge warehouses recently completed by developer for rent but are not yet in 24/7 operation. Doncaster Council’s lack of concern for the local residents of Thorne and Moorends in respect of poor air quality and unsustainable modes of travel see below:- Planning history of Nimbus Park 1 and 2: Case Officer for both 1. Nimbus Park 1 (06/03149/REMM 03/5695/P) This is the giant warehouse speculative development currently rented by the Range Company for Storage/Distribution. It was granted planning permission with a Section 106 Agreement between Doncaster Council, developer Helios landowners including Donald Parkinson, provided it was rail linked so that it would be sustainable and not use the road network, that the Paddock Road footway would be widened to 3.0 m and Selby Road footway also widened to provide a traffic free cycle/pedestrian shared footway from Nimbus Park 1 to Thorne North Railway Station and that Lands End Road Rail Crossing was improved for cyclist and pedestrian use. See 106 Agreement /3/5695/P Monies: Helios to explore rail connection #750,000, DMBC #1,500,000, Thorne Town Council #100,000 ,#25,000 first commuted sum,#45,000 second commuted sum? Failure to complete the promises made in the above planning obligation. 1. Rail connection investigation to transport by rail rather than on road network abandoned by Helios as grant unavailable after warehouse constructed accepted by DMBC without question. 2. Paddock Lane/ Road never widened to 3.0 m to provide traffic free shared cycle route for cyclists and pedestrians never done. Sue Higham DMBC Transport planner confirmed that there is no such route even though indicated as such in the Interactive Doncaster Cycle Map. 3. Improvements to Lands End Rail Crossing for cyclists and pedestrians never done according to FOI request to network rail. 4. Travel plan records were not requested by DMBC so there are no records of them. It seems both Councils received substantial payments from sustainable modes but this site has no sustainable modes of transport. The bus service is hopeless. No Air Quality Assessment was undertaken by the developers. Where did the money go that was intended for footway and rail crossing improvements? Nimbus Park 2 16/00126/OUTM Two huge Warehouses constructed here alongside the giant warehouse and again to be rented out for Storage /Distribution by developer. No Air Quality Assessment was undertaken by the developers. There are no sustainable modes of transport to this site and will be reliant on private car. The Transport Assessment submitted on this major planning application states that the site is well positioned to be accessed by sustainable modes of travel. This is patently untrue .Elisa Atkinson: Highways England Consultee Response for 16/00126/OUTM and dated 7th July ’16 made the following comment:- “Options of sustainable travel are hugely desirable in new developments to reduce their impact on the road network and reduce pollution. It is apparent from the Transport Statement that the present development does not possess the characteristics that make it accessible by sustainable modes and access other than by private car is likely to be quite low. There remains some limited potential for cycle access”. Unfortunately even the cycle access is poor as DMBC Transport Planner has confirmed that the traffic free cycle route from the site to Thorne North Railway Station is unsignposted. Mr Scott Cardwell, Assistant Director for Development for Doncaster Council stated in his email dated 4th Jan’18 that major planning application 16/00126/OUTM and also major planning application 15/0306/OUTM (for Aldi Supermarket, H&M Supermarket and Garden Centre, MacDonalds Drive Thru restaurant and Travel Lodge hotel on Omega Boulevard Capitol Park) both had extant planning applications so did not require Air Quality Assessments. I checked both extant planning applications 06/03174/REMM and 10/03149/OUTM and neither of them had ever had Air Quality Assessments
undertaken by their developers. Local people who live north of Thorne have been considerably let down by Doncaster Council in that neither Case Officer has ensured that fully updated Air Quality Assessments have been undertaken for both major developments and used in the decision making process. The Thorne Moorsend Neighbourhood Plan has no information whatsoever concerning the area of poor air quality north of Thorne even though its Working Group have been made aware of this issue by members of the public attending Thorne Moorsend Town Council Meetings. Thorne has become a dumping ground for Doncaster Council with the aid of Thorne Moorsend Town Council and its twin the Thorne Moorsend Neighbourhood Plan Working Group all self-serving. The previous Doncaster Local Plan was named as the Local Development Framework Sites and Policies Development Plan Document. This was withdrawn in September 2014 following the Inspector's Report. Some responses to the Doncaster Local Plan Consultation 2018 have made reference to it in their comments see examples below:-

04757 Anthea Lugton Objection to Site 160; The proposal ignores the last Local Plan of 2014 05015 Barbara Pike The development should be on the west side of Thorne by Junction 6 of the M18 as was planned in 2014. 05140 Don Turner its a departure from the original Local Plan I asked Local Plans Manager for details of the evidence of public support for Site 1 [001 Thorne North Junction 6 M18 from the Local Development Framework Sites and Policies Development Plan that had been withdrawn in 2014 and she could not give me any. Thorne Moorsend Neighbourhood Plan Consultation on Policy Areas October 2014 was a very expensive formal public consultation with large Document containing an inset Questionnaire. The Document contained information relating to the NP policies for guidance and had a large A4 Sized map named as the THORNE&MOOREENDS SITE MAP. The map itself on page 2 of the document had information relating to its code .Purple indicated Employment Allocations Proposed by Doncaster Council and the lighter orange colour indicated Housing Allocations Proposed by Doncaster Council. On page 3 of the document under the headline Housing it stated that both Thorne and Moorsend Communities were supportive of the housing allocations put forward in the Doncaster Local Plan and the plan will not look to amend those allocations. Yet there is no evidence of public support for these sites. Employment Site 1 [001 Thorne North Junction 6 M18] is coloured purple on the map and housing sites west of Thorne and west of Moorsend are coloured orange on the map. In October 2014 there were no Employment allocations Proposed by Doncaster Council and there were no Housing allocations proposed by Doncaster Council. The map therefore was false and misleading for any local resident accessing it for guidance in completing its questionnaire. Local Plans Manager, and Planning advisor to Thorne Moorsend Neighbourhood Plan Group stated in her email dated 21st March 2019 that a number of NP documents were sent to the Local Planning Authority by the then Clerk (Jeremy Sherlock) to the TMTC in 2017. Not all the documents needed for formal submission were completed and there were also some outstanding queries. The Thorne Moorsend Neighbourhood Plan was therefore not publicised under Regulation 16. Recently and very oddly, the Thorne Moorsend Neighbourhood Plan has been upgraded from limited weight to moderate weight for major planning applications 18/0249/OUTM...and therefore can be now considered as a material planning consideration. Major planning application 18/02496/OUTM was brought to the Planning Committee on the 20th August by its applicant Cllr Joe Blackham, landowner of the site. [Officer for] Local Plans Policy,[Consultee Response on planning application], [Planning] Case Officer [Planning Committee report] and Scott Fawcuc (in email to me) have all given the Thorne Moorsend Neighbourhood Plan added weight. This then can be used in the Doncaster Local Plan to influence the location of employment and housing sites in Thorne Moorsend area. In my view this is unjust.

Summary:

Objects to allocation of site 001 Reasons: Flood risk: 1. High risk flood zone (3) 2. Should be kept as a floodplain Support 1. No evidence of support in neighbourhood Plan 2. Unjust to give NP for weight that it deserves. 3. NP is being used to influence decisions on planning applications. 4. No evidence that local residents want development/ no evidence of support Environment: 1. Loss of countryside 2. Loss of prime agricultural land. 3. Impact on already bad air quality. 4. Home to water voles. 5. Close to Nightjar foraging area of Thorne Moors. Access: 1. No sustainable modes of transport to access site. 2. A614 is a dangerous road. 3. Dangerous access for pedestrians General: 1. Too much warehousing already. 2. Won't produce enough jobs because of automation. 3. Allocation of site will lead to housing allocations in flood zone 3 west of Moorsend and Thorne. Other issues raised: 1. The views of the Blackham family and associates do not fairly represent the views of all local people. 2. Conspiracy between several people and Council members.

Response:

The site is in flood zone 3 but benefits from flood defences. All available sites in the M18 are in Flood Zone 3. None are within the Functional Floodplain. The Thorne Moorsend Neighbourhood Plan does not allocate support, reject or specifically mention any employment sites although it does support the allocation of sites in the M18 corridor. Any decisions regarding site allocations have also had regard to public consultation and the results of that consultation. The site is greenfield and the Sustainability appraisal (SA) records criteria 12b (Landscape) as 'negative impact' (shown as '-' in the scoring matrix). The SA as records the criteria 14b (agricultural land score) as 'uncertain' (shown as '?'. In scoring matrix) this is Grade 3 Agricultural land but it has not been possible to ascertain whether it is 'best or most versatile (3a)' without further survey work on site. Development could result in an increase of traffic movements, which may affect air pollution. The Sustainability appraisal (SA) records criteria 14a (Air quality) as 'neutral' (shown as '0' in scoring matrix). Water voles and nightjar foraging areas are considered as part of the SA process and also in detail at the planning application process. Any planning application would need to provide sustainable transport access to the site. The SA process also looks at this through criteria 3a (i) (neutral impact), 3a(ii) (negative impact), 3a(iii) (positive impact) 3b(i) (negative impact). Highway safety including for pedestrians, would be considered as part of a planning application. Doncaster is an attractive place for warehousing due to it's road network, however the allocated employment sites will also be able to accommodate uses such as manufacturing.
Comment:

I object to Site 001 proposed as allocation to Employment Land. The local plan publication states: "Improved understanding of residual flood risk to the Borough, especially at the Main Town of Thorne-Moorends, following completion of Hydraulic Modelling being finalised by the Environment Agency at time of Plan preparation. The lack of detailed modelling available prior to adoption of this version of the Local Plan limited the Plan’s local flood risk evidence base at that point."

The above statement is wrong, it is very misleading to any interested parties reading the document, the modelling is not complete it is still in production as it states below. Through an FOI an email was received from the Environment Agency which states: "RE EMAIL RECEIVED FROM ENVIRONMENT AGENCY DATED 17 September 2019 "The hydraulic modelling mentioned in paragraph 1.11 on pages 2 and 3 of the current local plan (version) is still in production. Once finalised and published it will provide a better understanding of flood risk in the borough, particularly around Thorne and Moorends, however, as it is still in production it couldn’t be used by the council to provide the evidence base. The reference to the modelling is highlighted as one of a number of emerging issues and opportunities that may inform a review of the Local Plan. All planning applications are reviewed on their own merits, and developers will still have to undertake a detailed site-specific flood risk assessment on all sites in flood zones 2 and 3 (as shown on our flood map for planning). Once it is available, the new modelling data should be used by the developers as part of their assessment which in turn should identify appropriate ground and floor levels and any further mitigation that will be necessary to make a development safe for its lifetime, without increasing risk to others. Effectively, the process for determining applications in flood risk areas will be no different to what it is now, it will just be the evidence base that will change - by that we mean the extent and depths of modelled flooding. The risk could either increase or decrease as a result of this modelling, at this point in time we don’t know what the outcome will be. We will continue to object to development proposals where we are not satisfied that the assessment adequately addresses flood risk". Reading the above information from the EA states the modelling is not complete and the council cannot use it to provide evidence with regard flood risk in the Thorne and Moorends area. By you the council stating it is complete and that it’s given you a better understanding of this area is totally unacceptable. The site is in flood zone 3 but benefits from flood defences. All available sites in the M18 are in Flood Zone 3. None are within the Functional Floodplain. Hydraulic modelling is not yet complete and this is confirmed by the Environment Agency. The potential impacts of flooding would be examined as part of any planning application process and appropriate mitigation measures would be required. Any development should not worsen the risk of flooding. The Environment agency are consulted on planning applications. Regarding warehousing, Doncaster is an attractive place for warehousing due to its road network, however the allocated employment sites will also be able to accommodate uses such as manufacturing.
I object to Site 001 Thorne North Junction 6 proposed as Employment Land I strongly object to comments made October 2018 by Andrew Moorhouse, agent for landowner promoting Site 001 with incorrect information. "Site 1 is preferred by Town Council, Neighbourhood Plan and townsfolk - TC wrote to DMBC after its meeting on 9.10.18 to object to Local Plan. Local Objections from public now being made" Thorne & Moorends Town Council wrote to the local plan but they did not state they supported Site 001 for Employment Land, many of the Local objections submitted by residents of Thorne &Moorends objecting to Site 160 proposed / developed could quite easily apply to Site 001 the reasons given apply to both of these sites. Minutes of Thorne and Moorends Town Council 11th September 2012. Extract: "7 In terms of major employment sites site 1 is considered the most suitable as it is in the vicinity of existing warehousing / business development, and relatively accessible from both Thorne and Moorends. '8. Sites 2 and 35 should not be allocated for any use as they are open countryside sites which relate poorly to established developments’ The consultation meetings September 2012 (Sites & Policies) he refers to, a total of approximately 114 people attended two meetings in Thorne & Moorends, six votes for Site 001 as Employment Land, The agent and the landowner attended these meetings and cast their votes for Site 001, surely this can not be considered as preferred by the townsfolk? Thorne Colliery received four votes but this area has been disregarded. Site 001 is separate from other warehousing and is also in the countryside. The TMNP Questionnaires (2014) asks are there specific sites you think should be identified for employment land in Thorne/ Moorends? A total of 199 completed questions ( out of approximately twenty thousand residents ) stated in their responses preferred sites for employment:- Capitol Park, Coulman Road, Thorne Colliery, the local community are not stating Site 001 as a specific site to be developed and they are not stating they want more warehousing in this area, they are saying they want development on established locations including Thorne Colliery. "Current planning application 16/02136/ OUTMThere - a full range of studies has been submitted with the application and not one raises any reason for refusal" The planning application has been ongoing for over four years although not refused it has not been granted. "Site 1 provisionally allocated in Thorne and Moorends Neighbourhood Plan - see TMNP Site Map at Appendix Neighbourhood Plan for Thorne and Moorends 22 The Neighbourhood Plan was first published in October 2014. It proposed the allocation of Site 1 for Employment development, in accordance, at that time with the allocation by Doncaster in its Sites and Policies DPD. See its Site Plan at Appendix 2. POLICY E2: DEVELOPMENT OF NONNEIGHBOURHOOD PLAN ALLOCATED EMPLOYMENT SITES The allocation of sites along the M18 in the Doncaster Local Plan will be supported given the economic and logistical significance of this strategic transport route. Provision is expected to be made within development, through the layout of proposals, to promote physical connectivity with Thorne and Moorends. Development will also be expected to incorporate safe walking routes, cycle facilities and routes, and local public transport routes into the development at the planning stage to maximise the opportunity for local people to access jobs by ensure accessibility is prioritised" All new / proposed employment sites including Site 001 are not included in the Thorne & Moorends Neighbourhood Draft Plan, due to the area being Flood Zone 3 / high risk of flooding, they were not in the position at the time of publication to afford to pay out with regard gathering further information to examine the flood risk issues in Thorne & Moorends. The M18 and the M180 can equally be classed as it states in the TMNP publication "It is recognised that the M18 forms a strategic corridor through the District which is attractive to economic activity that in turn creates jobs. The Doncaster Local Plan, and its predecessors, has identified the corridor as a focus for employment allocations. The Neighbourhood Plan supports this strategy”. So why is it that they are just focusing it on the M18 and not M180 ? The Policy E2 applies the same reasons for both Site 001 and Site 160 "In allocating Bradholme, DMBC has disregarded the wishes of Thorne and Moorends as a community, as a Town Council and as Neighbourhood Development Plan authority. “ In allocating Site 001 DMBC have also disregarded the wishes of Thorne and Moorends as a community. "The Appearance and Character of the Settlement 7 The development of Site 1 would do no harm whatsoever to the appearance and character of the settlement. It is insulated from all residential parts of Thorne and Moorends by existing commercial development, namely the warehouse of The Range and the BMW distribution depot, which forms a belt 300-400 metres wide against the railway. Its development would be entirely compatible with, and complementary to, those establishments."

The appearance and character would change totally and would do enormous harm to the character of the settlement, I and some other residential properties neighbour this land we would most definitely not be insulated from this if developed , the agent seems not to care about us at all, does he seriously think that some residents in parts of Thorne and Moorends will not see these buildings. “The Character and Appearance of the Surrounding Countryside or Rural Setting 8 It would not significantly harm the character and appearance of the surrounding countryside or the rural setting to the settlement. Site 1 falls within the Countryside Policy Area of the UDP; and within the Thorne and Hatfield Peat Moorlands. Site 1 consists however of a featureless tract of arable land with vestigial hedgerows and few trees. It is not valued for recreation or views. A full arboricultural survey was submitted with the planning application (ref.16/02136/OUTM). Whilst it would bring signif? cant change, its landscape is of such low sensitivity that no significant harm would be done to the surrounding countryside or rural setting of Thorne” Of course it will significantly harm the character and appearance of the surrounding countryside, it may be flat but it is good quality agricultural land, it serves a purpose, it feeds us, it is far better with regards recreation views as it is now than it would ever be if developed, if developed it would be of significant harm on the surrounding countryside and the approach to the market town of Thorne. "Landscape and Visual Impact Assessment: Conclusion ‘7.2 The existing landscape of the site has no variations or complexities within its boundaries. It has no sense of place, and its character is that of industrialised agriculture” Really !!! What a load of rubbish this man states , it is a very well kept tidy flat field used for the purpose to grow food of course it has a sense of place. "Whilst there would be loss of countryside there would be no loss
of landscape which might contain the aspirations of the European Landscape Convention of 2000. There is little attachment to it by people."

From the residents that neighbour this land we are very much attached to it's appearance we most certainly would prefer it to stay as is and not have huge ugly buildings in its place and I would think the people that travel in and out of Thorne would agree. "7.3 The proposed development would consist of large-scale distribution warehouses and manufacturing units. Its purpose would be to take advantage of the location of the site next to Junction 6 of the M18. But for the motorway, it would immediately adjoin the existing large-scale commercial development on the west side of Thorne where The Range and BMW are established. "No it would not adjoin the existing large-scale commercial development, it would be totally separate, it is the other side of the motorway and further up the A614 than the existing development." 7.4 The development would result in an entirely new landscape, radically different from the existing one. Whilst there would be some effects that could be described as adverse, it would bring many beneficial ones, including with the right approach to design across the site, the creation of a ‘place’ for the first time. "7.5 Visually the site is remarkably well contained by existing features such as main roads on three sides and degraded land on the fourth. The new development would be briefly experienced by travellers passing along these roads, from which its identity as an employment park set within a landscaped framework would be readily apparent and apparently modern in character and appearance in keeping with its close relationship with the motorway." 7.6 There are dwellings scattered around the site which would undoubtedly be affected by the proposed development. However the access to the site is limited to a single point and advance works of earth moving and landscaping would minimise visual effects in the short and long term. Beyond these areas the new presence in the landscape of the development would not be discordant in the scale of the wide and spacious rural area which would be its setting. "Yes it would be an entirely new landscape but certainly not one for the better !! What absolute rubbish this man talks ! what beneficial effects do these ugly distribution units bring to an area ? A place for the first time, it has a sense of place now, visitors / residents travelling along Selby Road and the other roads bordering this land as I said earlier would surely prefer to see agricultural land than enormous ugly sheds ? Now he decides to give the residents here a mention and how he is going to minimise visual effects for us !!! There is no way on Gods earth that can be achieved. "Site 1 Thorne North Does not depend on other land being developed to create viability. It would however unlock land at Site 101 and bring urban regeneration, environmental improvement, and new footpath and cycle ways to Site 1. " At present no safe cycle route / footpath can be identified, even if Site 101 was “unlocked” any route presented will not make it “safe” motorways slip roads and unnamed railway crossing will have to be crossed whichever way they try to do it. "Residential parts of Thorne protected will be protected from effects of new commercial/industrial development by existing belt of similar development on west side of Thorne" What about thinking about the residents of Thorne that will be greatly effected who live directly opposite this land what about our protection ? Again this man cares not about us. " Site definitely not preferred by Town Council or tounsfolk - see objections to 2009 application at Bradholme in separate dossier with this objection” The objections that he has submitted from 2009 should be disregarded it would be totally wrong to use them as a material consideration in this process and he should not have included them in his response, only residents who submitting comments in the October 2018 consultation should be considered. "38 The Transportation Assessment contains detailed plans for the improvement of pedestrian routes be provided under the northern over-bridge, enabling the improvement of pedestrian route continuity. This would improve safety for pedestrians travelling to the site from all parts of Thorne along Fieldside (the A614 leading from the town centre). There is then a continuous footway across the western boundary of the unallocated Site 101 and the sewage farm. If Site 101 were to be developed it would perhaps enable the upgrade of the footway and the provision of a cycleway through to the south-west corner of Site 1. Here the Transportation Assessment provides a plan for a new footway leading from this point into the site; and an uncontrolled crossing point (that is without traffic light control) to enable pedestrians to cross to the west side of Selby Road. All this information, including detailed plans, has been included with the Transportation Assessment accompanying the application" As I stated after four years in planning a safe cycle / pedestrian route can still not be identified, even with the inclusion of site 101 "employees” would still have to cross two busy slip roads of the M18 or unmanned railway crossings which Network Rail have stated in a consultation reply on 16/02136/OUTM dated 4 April 2019 "We would appreciate clarity and assurance from the developer that there is no intention to establish pedestrian links between the site and this area that may lead to increase in usage of these crossings “ The local community is now beginning to respond to the publication of the draft Local Plan. Below are attached two letters which capture the reaction of at least two members of the public to the proposed development at Bradholme. The two objections letters he includes are John Pinda Walker and Ann Walker, these two people are both landowners of Site 001 which he omits to say. " Extracts from Ann Walkers letter below Site 1 Within single ownerships site 160 No, according to HELAA Site 001 is owned by five people , Don Parkinson, Doreen Parkinson, Kim Parkinson , John Pindar Walker and Ann Pinda Walker “Site 1 Moorends and Thorne north estate within walking distance, people already walk to work in the existing work places. Site 160 Within walking distance for people living in Thorne South. People from Mooreords would need to use car or bus” Again I will state for Site 001 no safe cycle/pedestrian route can be identified after four years ! Site 160 is within easy walking distance from Mooreords / Thorne although Mooreords is further away a safe cycle pedestrian route can be identified and implemented very easily so any “employees” from Mooreords / Thorne can get to work safely. "My conclusion is based on the fact that the J6 north site was chosen as the area for development in the HELAA, it is contradictory to change to the J5 South site especially considering that no new evidence has been provided to support this change. The author/s of the LDP have stated for the J5 south site where there is “clear developer intention to develop the site”, although they haven’t provided any evidence to support this claim. While the author/s fail to make the same comment for the J6 north site, there is clear evidence of the developers’ intention because they submitted plans to develop the site over 2 years ago and they have been working with DMBC planning department ever since to ensure that their plans meet all of the planners’ specifications. There is also very little local opposition against the submitted plans which suggest that local people are in favour of these proposals which was a different matter in 2009 when plans were rejected for the Bradholme development at J5 south. Local people didn’t want the J5 Thorne south/Bradholme site developing and my understanding from locals is that the feelings haven’t changed, the council is no longer interested and they want this site to be restored to farmland. No it would not adjoin the existing large-scale commercial development, it would be totally separate, it is the other side of the motorway and further up the A614 than the existing development.” The inconsistency between the findings of the proposed LDP and those of the HELAA raises serious questions about the capabilities of the author/s of the LDP. I recommend that a different team of planners should reconsider the evidence to ensure that the conclusion which have been drawn are valid. Yours sincerely, Ann Dr Ann Walker “ I can not find the information which states Junction 6 north Site was chosen as the area for development I would very much like to know where can I access this information? There is a very clear developer intention for Site 160 Bradholme it is owned by Haworth Group who I understand are very much ready to develop it Scoping Opinion now on the planning portal 19/02324/SCOP, local people actually are opposed to anymore warehouses in any area of Thorne, where is the clear developer intention for Site 001 ? There may be some interest but nothing set in stone from any interested parties. Very little local opposition, well there aren’t many local residents that neighbour site 001 but that does not give anyone the authority to disregard our views and I have to say with information which is starting to surface there is actually quite a lot of opposition to Site 001 being developed, see objection letters and petition submitted. The local plan is supposed to be what and where
Employment/ housing for Sites are preferable for allocation, although there are fewer residents around this land as members of the community that will be directly affected with regards a development on this site does not give you the authority to disregard our views and concerns, there are also many local residents who do not want development in this area, Site 001 is not a preferred site for employment, there is absolutely no evidence that can be identified that indicates there is considerable public support for Site 001, we have enough in fact more than our fair share of warehousing. This information should not be ignored. The local plan asks us the community to - helping to decide what is developed - helping to decide where the developments are - guiding the right developments to the right places - protecting and improving the environment - enhancing people’s quality of life If the local plan allocate Site 001 as employment land then you are not complying with the above, you would be doing the opposite of what you are asking from the community, that would make the plan not justified, the plan would not be based on evidence, the plan would not be sound. I strongly object to Site 001 proposed for allocation to Employment Land

Summary:
Objects to allocation of site 001 Reasons: 1. Views of Town Council/NP/Townsfolk have been misrepresented 2. TC shown no support for this site. 3. Disregards the wishes of the Thorne and Moorends community 4. No evidence that local residents want development/ no evidence of support 5. Loss of prime agricultural land. 6. It is a rural setting 7. Harm to character of settlement 8. Dangerous access for pedestrians 9. No safe cycle access 10. Site not connected to other development (Capitol Park/Nimbus Park) 11. Too much warehousing already. 12. M180 is equally as strategic as M18, why focus on M18? 13. Site is not in single ownership 14. No clear developer/owner intention or interest in site 15. Planning application on-going for 4 years but not been decided.

Response:
Comments noted. The Thorne Neighbourhood Plan does not allocate, support, reject or specifically mention any employment sites although it does support the allocation of sites in the M18 corridor. Any decisions regarding site allocations have also had regard to public consultation and the results of that consultation. The SA as records the criteria 14b (agricultural land score) as ‘uncertain’ (shown as? in scoring matrix) this is Grade 3 Agricultural land but it has not been possible to ascertain whether it is ‘best or most versatile (3a)’ without further survey work on site. Highway safety including for pedestrians, would be considered as part of a planning application. Any planning application would need to provide sustainable transport access to the site. The SA process also looks at this through criteria 3a (i) (neutral impact) , 3a(ii) (negative impact), 3a(iii) (positive impact) 3b(i) (negative impact). The setting of the site and its connections are addressed through the developer requirements section in the Local Plan as well as through any planning application. Doncaster is an attractive place for warehousing due to it’s road network, however the allocated employment sites will also be able to accommodate uses such as manufacturing. The M18 corridor was identified as a preferred location for development sites in Local Plan marketing analysis. The Doncaster section of the M180 is also taken into consideration as being within the same corridor. There is developer interest in the site and the owners are acting as a single entity.
I object to Site 001 now being proposed for allocation to Employment Land  What justification can you give as to why you are now proposing Site 001 for Employment allocation and not Site 160 as was previously planned October 2018 ? I would really appreciate an answer to this question. Why did you propose Site 160 when you are very aware that a planning application in 2008 attracted many residents to object to it, tactical reason ? Propose Bradholme , certain Thorne Moorends Town Councillors will do everything in their power (which they did do ) to rally the community to object ( which they did do) so you can then change your mind and propose Selby Road , i believe there is some kind of hidden agenda here. I understand you had a number of objections with regards Bradholme, my understanding is this is the only difference in the two sites, is this the only reason you changed your mind and now propose Site 001 ? Woods Environment and Infrastructure Re Site 001 states in green writing " The Site has support through the local Plan Sep - Oct 2018 ( see Draft Policies and proposed Sites Consultation Summary further information ) " Information online from - Local Development Framework Sites and Policies Development Plan Document  Agenda item 7 March 7th 2013 meeting Appendix 2 Consultation Summary Stage 2 ;Public Consultation "A2.3 Following this second round of consultation there was considerable public support for Site 001 " re a report by [a Planning Officer] . A request was sent for the evidence of this " public support " A email reply from [a Planning Officer] 8 September 2019 states " I am sorry but as I was not the report author I do not know what evidence [a Planning Officer] was relying on to make the statement that you quote. In preparing the Local Plan that is currently out to Publication we did not rely on evidence from the Sites and Policies document. " So no evidence can be produced to back up [a Planning Officer']s comments [Redacted Text] Obviously the Sites and Policies document is being relied on as Woods Environment tell us to refer to for further information, why are they still referring to it ? Where is this support they are saying Site 001 has ? The evidence based information on sites in the local plan to date states :- Site 001 Support - D Parkinson landowner A Moorhouse Agent Thorne Moorends Ward Members ( doesn't say how Many ? ) Why are you saying Site 001 has support ? Doncaster Employment Land Review Amendments to be made states "In light of the local plan informal consultation in Sep - Oct 2018 page 22 J6 M18 Thorne (Ref Site 001) Albeit slightly more remote from the main urban area of Doncaster than some of the other LP review site. Why does this now have a red line through it ? Site 001 has not moved since the review was done so why are you saying it's not actually more remote now ? They go on to say This site would represent a new large scale distribution location closer to the Humber Ports than most of the other sites under construction The above text is in red, the above is also true of Site 160 location. Also There is a water treatment works on land to the south which does produce some unpleasant odour The "which does produce some unpleasant odour " is crossed out, take it from someone who does actually live here it can at times produce unpleasant odour , so many incorrect facts ! [Redacted Text] With regards Site 160 Bradholme, and please document the fact that between the two sites because of how the owners of Site 160 have thought about the layout, out of the two if we have to be a dumping ground for more warehouses I support Site 160 for development. Site 160 , Owned by The Harworth Group who are ready to develop it. DMBC Council committee report describes the surrounding area to Site 160 as "relatively featureless open countryside ". Access to the town centre would be suitable for pedestrians and cyclists , the route is lightly trafficked with excellent highway connection, the onsite flood mitigation would be large linked detention basins with controlled discharge to the local land drainage system which have been approved and agreed with the Environment Agency. Also agreed by Highways Agency traffic impact assessment proposals and supported the development on the basis of limited site improvements to the local highway network. Highways Agency existing highway layout in the vicinity of the site could be relatively minor improvements to local junctions to accommodate additional traffic." Site 160 Bradholme if developed would be an urban extension of Thorne / Moorends , a safe cycle / pedestrian route can be achieved from Moorends / Thorne to it this is now documented in the screening opinion on the planning portal 19/02324/SCOP. A bus route is already in place from Moorends/Thorne to accommodate employees to Site 160. The accessibility to the proximity of the M180 is very good , better access to the motorway than Site 001 to the M18 . Traffic would leave Site 160 and head to Junction J1 where they then could then very quickly access M18 North and South extra traffic generated by development would not have to or wouldn't need to go through Thorne / Moorends, as suggested by the agent / landowner of Site 001 that traffic generated from Site 160 would cut through Thorne centre to get to Junction 6 M18 but why would they when it would be much easier and quicker to get onto the M180 at Junction 1 travel junction 5 then north on the M18. The illustrated plan on the portal looks well thought out with balancing ponds which will obviously aid issues flooding and encourage wildlife it also shows areas of open space, the larger buildings look like they are placed further away from residential properties, Site 001 illustrated plan shows the whole area filled with warehouses, no balancing ponds ( underground tanks proposed to take surface water which will be pumped into the river at some point ) At this present time 29 September 2019 I have received a text from Floodline informing me of a Flood Alert Issue, no open spaces on the plan no care with regards flood issues , nothing to keep and attract wildlife and certainly no thought for the residents around Site 001. Site 160 is not classified as Coastal and floodplain Grazing Marsh so is lower in ecological value than Site 001. It has been said by the owner Kim Parkinson of Site 001 that Bradholme is part of Thorne Mere, I also have the book that TMTC refer to in their Thorne &Moorends Neighbourhood Plan response October 2018 where they state this, they were actually informed of this fact by Kim Parkinson in an email this is the reason they included it in their response, but the book does not actually state 100% that Bradholme is part of Thorne Mere, I questioned this with the clerk after the response had been submitted and I have an email from TMTC clerk confirming this. Thorne and Moorends Town Council submitted a response to the Local Plan dated (11 October 2018) this is a misrepresentation and should be disregarded , they state : 1 " We speak on behalf of the majority of the community in Thorne - Moorends when we say that for as long as there
remains an intention to include site 160 Bradholme Farm for employment land that we will simply be unable to express any support whatsoever for the Local Plan. 2 "Extensive consultation has been carried out in support of the development of the Neighbourhood Plan. The Town Council therefore has developed a clear understanding of the views of local people. It is very clear from that consultation and indeed the extent of representations that have been made recently that there is an overwhelming feeling of opposition to any development on the Bradholme." At the time of writing the response to the Local Plan from the Clerk on behalf of TMTC he did not have the correct facts or any concrete evidence to support these statements. 1 I attended the TMTC meeting 9 October 2018 approx twenty members of the public also attended, not all spoke and gave comments / objections the twenty members of the public can not be all combined as objecting to Site 160 Bradholme , this amount can not be interpreted as "we speak on behalf of the majority of the community of Thorne and Moorends." There is no evidence to support this comment , approx twenty members of the public are certainly not the majority of the community. I do of course understand that quite a number of objections were submitted in October but many of the reasons given for objection can also apply for the development of Site 001 the same reasons for objections apply for both sites. With regards this meeting when the Local Plan was discussed Councillor Joe Blackham spoke and said he did not want Bradholme developed he urged all Thorne and Moorends residents to object to the proposal, Council Susan Durrant also reiterated his comments, Members of the public were urged to put their complaints in writing and send them off to DMBC. Thorn Times October 2018 reporting on the meeting and quoted "Following discussions by Thorne Moorends town councillors at the October meeting, members voted unanimously to oppose the proposals for the Doncaster local plan with Town Mayor Susan Durant urging residents to respond to the consultation and submit objections. Cllr Joe Blackham said he supported a "total rejection" of the Bradholme proposals for the Doncaster local plan, adding it was "imperative that people put in objections". Cllr Blackham said the proposals bore no resemblance to the Thorne and Moorends neighbourhood plan, saying it was "exactly the opposite". Councillor Joe Blackham has land in the west of Moornds two planning applications for housing on this land have now been refused he actually lives and so does Councillor Mark Houlbrook south of Thorne near Site 160 Bradholme, understandable why they do not want warehouses there then and are pushing for them as far away as possible from where they live. Since having his say at the meeting and getting everyone to object, at meetings after this any local plan on the agenda Councillor Blackham has declared an interest and not taken part in discussions including the TMTC September 2019 meeting, Local Plan was on the agenda he declared an interest did not give a reason, Site 001 was discussed at this meeting which concluded that certain councillors mainly Councillor Susan Durrant [Redacted Text] support Site 001 for Employment Land, I asked for justification for supporting Site 001 and not Site 160 but I did not get an answer. Why did he declare an interest in this meeting yet not in October 2018 I understand nothing has changed , he was a landowner with a pending planning application then as he was at the September 2019 meeting ? [Redacted Text - Supposition] 2 From research I have carried out with regard to the Thorne and Moorends Neighbourhood Plan the consultation meetings attracted very little support from the local community , at the Sites and Policies Engagement Event at Thorne OAP Centre 10 September 2012 a total of 14 people attended which included 2 DMBC Ward Councillors, 2 individuals from TMTC, a landowner and his agent 2 local builders and 6 residents from Thorne who live on the Southern edge opposed to Bradholme, the summaries show a total of just six people voted for Site 001 for Employment and one against. If myself and residents near had been informed about the meeting voting would have been very different. I have visited the council offices and read the 199 completed NP questionnaires received, I also have the summaries for these questionnaires, 199 out of a population of over twenty thousand is not "extensive consultation " TMNP Questionnaires 2014 asks are there specific sites you think should be identified for employment in Moores / Thorne ? The very few members of the community compared to the size of Thorne & Moorends who respondents stated preferred sites Capitol Park Coulman Road Thorne Colliery They are not saying they want warehousing and they are not stating Site 1 as a specific site to be developed, the community want development on established locations as listed above, The Town Council has not developed a clear understanding of the local community , they did not receive extensive representations in the NP Consultation period opposing Bradholme as an Employment Site and certainly on the 9 October there were only around twenty members of the public attended to air their views and I stated above not all attended were objecting to Bradholme, that is in no way shape or form the majority of the community of Thorne and Moorends. There is no evidence from the public consultations to support Site 001 as Employment land, Thorne and Moorends Town Council have misrepresented the actual findings of the public consultations carried out in 2012 and 2014 this is totally unacceptable and should not be taken into consideration with regard to the final decision on the classification of Site 001, the Classification of Site 001 should stay as it " Countryside Policy Area " the Local community that put their comments forward do not support employment land at Site 001. With regards to the compiling of a Neighbourhood Plan, Planning Aid state - Your policies should be based on robust evidence, facts and figures, e.g.: opinions given in consultation responses, evidence is extremely important as it ensures that the choices made in the Neighbourhood Plan are backed up by facts. Thorne & Moores Neighbourhood Plan have not adhered to the above , the steering group [Redacted Text] have simply disregarded the local communities opinions which is simply unacceptable and makes a mockery of a document that cost a huge amount to be prepare. At present we have two empty distribution centres at Nimbus Park, there is a distribution centre at Arthorpe still waiting to be occupied. Doncaster and the surrounding is becoming an unsightly depressing place to live and visit. From talking to people in this area and getting feed back from a post put on facebook residents here do not want anymore warehouses, the feeling is we have enough. Submitted this morning 30 September 2019 to DMBC offices 239 signed objection letters objecting to Site 001 proposed for Employment Land, also a Petition with 390 signatures, please respect the wishes and views of the local community this is a local plan evidence has been submitted to you of what the local people want, these are the views of local people, do not allocate Site 001 to Employment Land. Please note I would like to attend the inspectors meeting at council offices to make comments please. I strongly object to Site 001 proposed as Employment Land.

Summary:

Objects to allocation of site 001 Reasons: 1. There is a petition with 239 sgs objecting to allocation. 2. No evidence that local residents want development/ no evidence of support 3. Detrimental to the environment 4. Too much warehousing already. 5. Is the switch to 001 from 160 purely because of objections to 160? 6. Site 160 should be allocated. 7. No evidence of opposition to 160 being allocated. 8. Lack of local consultation 9. Local councillors have a hidden agendas 10. Hidden agenda for originally proposing 160 then switching to 001.

Response:

Comments noted. The petition has been received and is acknowledged. The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. Regard is also had to the results from public consultation. There is also developer interest in the site. The Sustainability Appraisal (SA) assesses the sites for the impact on the environment. This includes a range of criteria including 12a Biodiversity and 12b landscape (both negative impact). Any development proposal would be subject to assessment of the impact on the environment. Doncaster is an attractive place for warehousing due to it's road network, however the allocated employment sites will also be able to accommodate uses such as manufacturing. Consultation is an important part of the Local Plan process. The methods used are set out in the Council's 'Statement of Community Involvement (SCI)' The SCI itself was subject to consultation. The 'Local Development Scheme' sets out the Local Plan process and progress and includes all stages where consultation
has been undertaken. The Regulation 22 Statement of Consultation also shows when consultation was undertaken and the responses received and how it influenced the Local Plan process. All efforts have been made to inform and consult at various stages of the plan process. All consultation responses have an important role in formation of the Local Plan. Site 160 was originally proposed for allocation in the 2018 consultation. Based on responses to that consultation Site 160 was removed and Site 001 subsequently proposed for allocation.

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| Comment: I object to Site 001 proposed as Employment Land  Wit regard to comments made by Kim Parkinson consultation period October 2019, my concerns are with regards to Kim Parkinson the land owner promoting his site with incorrect information. "Deliverability of Site 160 Bradholme may well be however. No planning application is in and (we find) that takes time. It is the site of the historic Thorne Mere" Scoping opinion now live for Site 160, he was the one too tell TMTC that it was part of Thorne Mere but there is nothing that 100% proves that so that statement should be disregarded unless he has concrete evidence that says different. "Colliers say that the J6 M18, Thorne Site (ref 001) is next to a water treatment plant producing unpleasant odours. I live near this facility and I have not experienced any odour issues at all that I can remember. "I live near the water treatment plant and at times it does give off odour, he lives too far away to smell it [Redacted Text]. "2.3 Colliers state the Bradholme site is "closer to the Humber Ports than most of the other sites under consideration" (p23). "It is not right next door to Thorne and Moorends. It is not right next door to Thorne just across the road from Moorends Site 1 J6 M18 Thorne North site is in reasonable walking distance of most of Thorne and all Moorends. Moorends needs high value jobs to pull it up by the bootstraps. "Bradholme is also within reasonable walking distance to Thorne / Moorends and to walk and cycle that route would be the safer option of the two but obviously safety is not a priority with Mr Parkinson. As for high value jobs this type of employment creates very few jobs because of the automated systems for high value!!'

"2.11 Colliers’ report does not refer to flows of people - how people would get to work at Bradholme (Site 160). Many workers walk to work in this locality. Bradholme is a long walk from Moorends and most of Thorne. Site 1 J6 M18 is ideally situated in this regard." Bradholme is situated ideally for local people as I said it is a much safer already in place route for pedestrians and cyclists, for any individual who wants a job, wants to work then travelling by foot or bike from Moorends to Bradholme would not cause any issues, it also benefits from a bus route already in place from Moorends which passes the Bradholme Site. There are other comments that I feel need addressed but to be quite honest its making me angry reading them and in other letters of objection I have submitted I feel I have covered the issues , just one last comment I would like to address is "To the West is an EA facility (commonly known locally as 'The Cake Mill') where excavation equipment etc is stored, the banks of the River Don, Fishlake Commercial (a 24/7 Commercial Vehicle maintenance facility), a commercial Dog Kennels and a small arable field wedged between the A614 and the Don bank. There is also what I believe used to be a coal yard that is now in residential use" The “commercial dog kennels” he refers to is our business which we built nineteen years ago, at the side of the kennels is our family home which stands in three acres of garden and land not commercial at all but very residential which he omits to say in his comments, there are a number of other residential properties around but he fails to mention them but seems to want to paint a picture that the area around is very commercial, when that’s not the case, just goes to show what kind of person this man is. Statements submitted by the agent and landowner should be verified to be truthful before taken into consideration with regards very important matters as this is. I strongly object to Site 001 proposed for allocation to Employment Land.

**Summary:**

Objects to allocation of site 001 Reasons: 1. Disputes Colliers statement re being unpleasant odours from water treatment works - there are no odour issues 2. Disputes Colliers statement that site is remote 3. Site will create few jobs 4. Colliers site assessment fails to mention residential properties in the vicinity of the site. 5. Re statement from Parkinson that Bradholme site (160) is part of 'Thorne Mere' - there is no evidence to support this. 6. Bradholme (160) is more accessible for pedestrians/cyclists/public transport

**Response:**

The Employment Land Review written by Colliers has an amendment which now states that there are no odour issues from the water treatment works. The amendment has also removed the reference to the site being remote. Regarding the amount of jobs, a fully developed site of this size should deliver a significant number of jobs. In comparison to similar sized sites this would be expected to be 3,000 plus. It is agreed that in terms of ‘Access’ site 160 does score better in the Sustainability Assessment. However there is very little difference overall between the two sites.
Comment:

I object to Site 001 proposed as Employment Land. From information gathered with regards the preparation of the local plan I believe it hasn’t been advertised nearly enough, not enough of the community know about it and about the proposed housing and employment sites that could potentially affect them in their day to day life. The previous consultation in October 2018 attracted 1200 responses out of a population of around 310,000 you have to agree that is a really poor response, if you were to ask people randomly what is the Local Plan they wouldn’t have a clue what your talking about. The council should have sent out flyers to households yes I understand it is a lot but that way it lets everyone know about the local plan it gives everyone the chance, they have a choice, they can make comments on issues that affect them or choose not to but that way you have given them a choice, but you really seem to have kept the whole thing under raps, not everyone is on social media, having said that I noticed very few posts regarding the local plan, not everyone buys a newspaper you cannot rely on these things alone to inform members of the community what’s going to happen in the areas they live and work. The other important point I would like to make is how difficult it is to navigate around the website, it’s certainly not for the faint hearted and I can clearly understand how someone who maybe wants to make comments, that’s on the assumption they have found in the publication what they are looking for / that is of interest to them, actually give up! The comments form can not be filled in on some computers / tablets, it should be much clearer that people can email or post comments, again to me it’s like you don’t really want the feed back from the community. Not nearly enough responses were received in October compared to the size of the Borough is that because the community didn’t know about it? Not interested in it? Found it too difficult to respond so gave up trying? For the above reasons I do not believe the local plan is “sound” the experience I have had with the process of the local plan is inadequate, far to much emphasis has been put on the very few responses / comments received, these have been accepted and deemed as what the majority of the community want in order to shape the plan and its decision to now propose Site 001 for Employment Land, the most important factor in this is that the people who would be directly involved in this Site being developed were not informed from the very start of the process, myself and I firmly believe other neighbours to Site 001 would have had no clue about the local plan it’s only because of the pending planning application that we are aware of if, which is astonishing and inexcusable, the community that it will affect the most not informed of what’s happening right on our doorsteps! absolutely unbelievable process! just so very very wrong of DMBC to treat us this way. I strongly object to Site 001 proposed as Employment Land.

Summary:

Objects to allocation of site 001 Reasons: 1. lack of local consultation 2. People do not know about this site being allocated. 3. Too much weight given to too few consultation responses 4. People living near the site have not been informed. 5. Website is difficult to navigate

Response:

Comments noted. Consultation is an important part of the Local Plan process. The methods used are set out in the Council’s ‘Statement of Community Involvement (SCI) The SCI itself was subject to consultation. The ‘Local Development Scheme’ sets out the Local Plan process and progress and includes all stages where consultation has been undertaken. The Regulation 22 Statement of Consultation also shows when consultation was undertaken and the responses received and how it influenced the Local Plan process. All efforts have been made to inform and consult at various stages of the plan process. All consultation responses have an important role in formation of the Local Plan. Various consultation methods have been used during the Local Plan preparation process including the website, local press, site notices, social media, libraries, Parish Council meetings and Councillor meetings. The website includes a lot of information, evidence base and data involved with the Local Plan and we try to make this available via the website in this best way possible.
I object to your decision to now propose Site 001 Thorne North for allocation to Employment Land. The statements I make are based on accurate researched information which I believe to be correct. Site 001 is not in single ownership, the land is owned by five individuals there has been no evidence submitted on the planning portal from the owners with proof regarding expressions of interest to purchase/develop it, I have now seen some emails to the agent enquiring about the land but there is nothing to say that any of them want to or are in a position to develop it. Constraints include power lines, Drainage, it fails the flood risk sequential test as it is in Flood zone 3, there are more deliverable sites in other areas. It is not in the vicinity of other existing warehousing it would not adjoin Nimbus Park or Capitol Park. Site 001 is separated from urban areas of Thorne/Moorends by a railway and more significantly the M18 motorway. It is isolated from Thorne and Moorends, Site 001 in the draft plan states it lies outside the urban framework and it is significant that the council when first assessing this site stated that it is the wrong side of the motorway on the assessment form, it is not a sustainable urban extension. DMBC senior pollution control officer, 9 September 2016 states "If development goes ahead it will worsen further the already poor air quality in this part of Thorne " She states she does not support the planning application pending, increased traffic this major development will generate will increase the nitrogen dioxide in the air we breathe. A major development in this area of Thorne will not fit into the criteria of DMBC air quality action plan which is to clean up its air and reduce the number of pollution rated deaths. Doncaster Air Quality Plan (DMBC 2013) states "The Doncaster Local Plan will need to take into account of Air Quality Management Area and attempt to reduce vehicle traffic in general, it will help implement many of the targets and objectives" developing Site 001 would be contrary to your policy, DMBC have a duty of care to the community in this area of Thorne to help clean up our air. Since [the Senior Pollution Control Officer] report Thorne now has an Aldi, B&M, McDonalds, a new Public House and Restaurant plus two B8 industrial units at Nimbus Park none of the planning applications for these developments appear to have air quality responses submitted, all these new developments are contributing emissions from cars/wagons adding to the already poor air quality in this area. Site 001 does not have the benefit of extensive flood basins it is further away from the motorway than the proposed site for allocation Site 160 Bradholme. No safe cycle/pedestrian routes to Site 001 can yet be identified, cycle/pedestrian routes that have been suggested are not safe. Employees from Thorne/Moorends would have to cross the slips roads of the M18 motorway, the A614 is not wide enough in places to accommodate a safe cycle/pedestrian route, this road is an extremely busy road. An alternative route suggested would expect cyclists/pedestrians to cross one of three unmanned rail crossings (Data provided by Network Rail on the Thorne and Moorends unmanned crossings state sixty nine trains per day travelling at 70mph.) the route would then run along North Common Road, a very narrow road, not light trafficked, it is frequently used by car transports / hauliers / deliveries to a chicken factory in Thorne, the road is not wide enough for two wagons travelling at speed to pass on either side of the road without slowing down considerably, again there is not enough width in places to accommodate a safe cycle/pedestrian route. There has been seven separate traffic accidents in the past approximately twenty months on Selby Road / North Common Road. Highways England recommend planning not be granted until outstanding issues are solved this has been ongoing for over four years now. It would destroy a vast area of open countryside which is home to and valuable hunting ground to many species of wildlife e.g. Water Vole, Nightjar, Barn Owls, Tawney Owl, Lapwing, Yellow Hammer, Kestrels, Marsh Harrier, Buzzards, Deer etc. Natural England's Agricultural Land Classification Map shows this area of land as Grade 3 - very good. I have asked numerous times for a soil survey to be carried out but my request has been ignored. Development would result in a loss of high quality agricultural land as such the proposal is contrary to Policy CS18 of Doncaster Core Strategy 2011 - 2028 plus paragraph 112 of the National Planning Policy Framework "CS18 " avoid developments on Best and most Versatile Agricultural Land" Paragraph 112 " local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use poorer quality land in preference to that of a higher quality” The whole area is part of The Humberhead Levels, a vast area of this 182 acres of Land is classified as Coastal and Floodplain Grazing Marsh - Priority Habitat Inventory:- Coastal grazing marshes and their associated dyke systems are an important brackish habitat for many estuarine species. They lie at or below sea level, and are almost all enclosed by seawalls, having originally been reclaimed from saltmarsh. These brackish water dykes are an important habitat nationally and locally. Yorkshire Wildlife state: "Due to the developments site's location within the Humberhead Levels Character Area we therefore advise that the application is refused. Critically there is an area of Lowland Fen habitat adjacent to the proposed development site at SE 67442 15197. Fen is a priority habitat for the Humberhead Levels partnership and is particularly sensitive to changes in the hydrological regime thus any development in this area could be potentially damaging to this rare habitat." Major employment development on this land would encroach massively into the countryside that would prove disruptive and harmful to the character and wider landscape, it would not enhance the character landscape or nature conservation value of the local environment therefore contrary to Policies CS1 CS2 CS14 Core Strategy and ENV2 ENV4 Doncaster Unitary Development Plan. There is no evidence from the public consultations to support Site 001 as Employment land, Thorne and Moorends Town Council have misrepresented the actual findings of the public consultations carried out in 2012 and 2014 this is totally unacceptable and should not be taken into consideration with regard to the final decision on the classification of Site 001, the Classification of Site 001 should stay as it " Countryside Policy Area “ the Local community that put their comments forward do not support employment land at Site 001. With regards to the compiling of a Neighbourhood Plan, Planning Aid state - Your policies should be based on robust evidence, facts and figures, e.g.: opinions given in consultation responses, evidence is extremely important as it ensures that the choices made in the Neighbourhood Plan are backed up by facts.
Thorne & Moorends Neighbourhood Plan have not adhered to the above, the steering group which included three closely related members of the same family have simply disregarded the local communities opinions which is simply unacceptable and makes a mockery of a document that cost a huge amount to be prepare. I strongly object Site 001 proposed for allocation to Employment Land

Summary:
Objects to allocation of site 001 Reasons: Flood-risk: 1. High risk flood zone (3) 2. Site is classified as 'Coastal Floodplain' as part of Humber head Levels. 3. Site does not benefit from flood basins Support: 1. NP does not represent the views of the community. 2. No evidence that local residents want development/ no evidence of support Environment 1. Loss of countryside 2. Site should stay as Countryside PA. 3. Loss of prime agricultural land. 4. No soil survey carried out. 5. Site is part of Humber head levels. 6. Potential damage to adjacent 'Fen Habitat' (SE 67442,15197). 7. Site is classified as 'Grazing Marsh - priority habitat' as part of Humber head levels. 8. Impact on already bad air quality. 9. Negative impact on air quality (backed by Lisa Croft (DMBC pollution control) 10. Not consistent with DMBC air quality action plan. 11. Impact on ecology (multiple species) 12. Yorkshire Wildlife recommend planning app should be refused. 13. Harm to character of settlement Access: 1. Dangerous access for pedestrians 2. No safe cycle access 3. Highways England do not support planning permission until 'issues' resolved. Constraints: 1. Power lines on site 2. Drainage is a constraint Location: 1. Site not connected to other development (Capitol Park/Nimbus Park) 2. Separated from Urban areas of Thorne and Moorends 3. Not a suitable urban extension 4. Not close to M18 Mway. 5. Council own original assessment says site is on the wrong side of the Motorway. General 1. Site is not in single ownership 2. No clear developer/owner intention or interest in site 3. Other sites are more deliverable 4. The NP steering group membership is weighted by one family.

Response:
The site is in flood zone 3 but benefits from flood defences. All available sites in the M18 are in Flood Zone 3. None are within the Functional Floodplain. Consultation is an important part of the Local Plan process. The methods used are set out in the Council’s ‘Statement of Community Involvement (SCI)’ The SCI itself was subject to consultation. The ‘Local Development Scheme’ sets out the Local Plan process and progress and includes all stages where consultation has been undertaken. The Regulation 22 Statement of Consultation also shows when consultation was undertaken and the responses received and how it influenced the Local Plan process. All efforts have been made to inform and consult at various stages of the plan process. All consultation responses have an important role in formation of the Local Plan. The Thorne Neighbourhood Plan does not allocate, support, reject or specifically mention any employment sites although it does support the allocation of sites in the M18 corridor. Any decisions regarding site allocations have also had regard to public consultation and the results of that consultation. The site is a greenfield (as are the other employment allocation options along the M18). The Sustainability appraisal (SA) records criteria 12b (Landscape) as ‘negative impact’ (shown as ‘-’ in the scoring matrix). The SA also records criteria 14b (agricultural land score) as ‘uncertain’ (shown as ? In scoring matrix) This is Grade 3 Agricultural land but it has not been possible to ascertain whether it is ‘best or most versatile (3a)’ without further survey work on site. Any further issues regarding biodiversity would be examined as part of the planning application process. Development could result in an increase of traffic movements, which may affect air pollution. The Sustainability appraisal (SA) records criteria 14e (Air quality) as ‘neutral’ (shown as ‘0’ in scoring matrix). Further work on air quality would be required as part of any planning application and regard would be had any Air Quality Action Plan. Regarding ecology, the SA records criteria 12a (Biodiversity impact) as ‘negative effect’ (shown as ‘-’ in scoring matrix) and it is noted that the Yorkshire Wildlife Trust raised several important issues regarding various species to the 2106 planning application. They also state that they would be happy to advise on how the site can be ‘master planned and managed to benefit biodiversity’. (Yorkshire wildlife Trust October 2016 in response to planning application 16/02136/OUTM). Any planning application would need to provide sustainable transport access to the site. The SA process also looks at this through criteria 3a (i) (neutral impact) , 3a(ii) (negative impact), 3a(iii) (positive impact) 3b(i) (negative impact). Highway safety including for pedestrians, would be considered as part of a planning application. For issues regarding the strategic road network, Highways England are a statutory consultee for major planning applications. Any comments they make would be considered in the decision process. The planning application process (including master planning) would also take power lines into consideration as well as drainage. It would also look at the site’s setting and connections to Thorne. The site is now being promoted by a developer and has owners who are acting as a single entity. The site is deliverable and was considered so in the Housing and Economic Land Availability Assessment (HELAA). Any sites which were not assessed as being Available, Suitable or Deliverable where excluded from the site selection process. .
I object to Site 001 Thorne North Junction 6 proposed as Employment Land. I question the comments made by TMTC submitted to the local plan in October 2018. “Please accept this letter as the formal response to the informal consultation in relation to the draft Doncaster Local Plan from Thorne-Moorends Town Council as a Town Council representing one of the principal communities of the Doncaster borough we regret to say that words simply do not do enough to express just how vehemently opposed we are as a Town Council to the draft Local Plan in its current form.” What I do understand is why they are so vehemently opposed to Site 160 but seem quite happy to support Site 001 as Employment Land? “We speak on behalf of the majority of the community in Thorne - Moorends when we say that for as long as there remains an intention to include site 160 Bradholme Farm for employment land that we will simply be unable to express any support whatsoever for the Local Plan.” They can not say they speak on behalf of the majority of the community, at the time of writing this response they did not know how many objections would be submitted. The basis of our objection is as outlined below. 1. The proposal is in direct contravention of National Planning Policy Framework (‘NPPF’) National Planning Policy Framework confirms that the planning system should ‘contribute to and enhance the natural local environment by protecting and enhancing valued landscapes’ Paragraph 170. Plans must recognise the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services. The Local Plan by including site 160 fails to adhere to NPPF. 2. The proposal will have catastrophic environmental consequences for an area that forms an integral part of National Character Area 39 being the Humberhead Levels. This site is in extremely close proximity to the Thorne and Hatfield Moors. The site itself forms part of internationally important habitat which contributes to landscape character, helps combat climate change and reduce flood risks. The area is within a Nightjar Foraging Area. The nightjar is a species on the Amber List for conservation purposes and is ‘at risk’. Destruction of its habitat should be fiercely opposed. 3. The area consists of land of high agricultural value. NPPF places an onus on taking account of the benefits of the best and most versatile agricultural land. This land is regarded as some of the best agricultural land in the country. 4. The development of the site will be in direct conflict with the Councils own Countryside Protection Policy. It is determined by Doncaster Council that the Countryside Protection Policy has been sufficient to afford large swathes of land east of Doncaster similar levels of protection to Green Belt. The very existence of the policy and the rationale behind it demonstrates that this land has been clearly been given high regard as ‘countryside’. To now include such a large area of this land for employment allocation serves as a complete and utter disregard for the Councils own policy.” All the above reasons also apply to Site 001 so why are TMTC not going tooobject to Site 001 now proposed as Employment Land the same as they did for Site 160. “The proposal will be in direct conflict with the emerging and advanced Thorne - Moorends Neighbourhood Plan. Extensive consultation has been carried out in support of the development of the Neighbourhood Plan. The Town Council therefore has developed a clear understanding of the views of local people. It is very clear from that consultation and indeed the extent of representations that have been made recently that there is an overwhelming feeling of opposition to any development on the Bradholme site. “The Bradholme Site was never mentioned in any Neighbourhood Plan consultations, the Town Council have no clue never mind understanding of the views of local people and they are wrong to say they do. “This will be reflected in the final Neighbourhood Plan. 6. The nearby road infrastructure is insufficient to accommodate the increased traffic levels that a development on the scale of the site proposed would generate. A development of the size and scale envisaged would generate significant levels of vehicle movements. Whilst we appreciate the final details of any development are yet to submitted for planning permission, the sheer size of the land proposed for employment allocation is such that it is not difficult to imagine the traffic it will generate. The roads that border the site have not been designed with such a large scale development adjacent to them in mind.” The above reasons also apply to Site 001 so why do they still not vehemently oppose Site 001 as they did Site 160? Thorne & Moorends Town Council can not produce any evidence that proves Site 001 is the preferred site for development, for some reason they are objecting to Site 160 and supporting Site 001, I have asked for Justification but I get no response from the councillors. I have received a draft copy to be submitted to the local plan consultation September 2019 from TMTC clerk it reads “In principle the Council has resolved to support the Local Plan. The Council recognised the need for Doncaster to introduce a planning framework through the Local Plan to help shape the growth and development of the district.” So they support the allocation to Employment Land for Site 001, by supporting the allocation of Employment Land for Site 160 would also help to shape the growth and development of the district. “Notwithstanding the Councils general position of support, the Council would like to make the following comments 1. The Council notes that Bradholme Farm as a site for employment allocation has now been excluded from the draft Local Plan. Thorne Moorends Town Council stands by its position set out in it’s October 2018 consultation response in relation to Bradholme Farm.” So again reiterating that don’t want Bradholme to be developed but it’s fine to develop Site 001. 2. Thorne Moorends Town Council is aware that there are local residents fiercely opposed to development on Selby Road, Thorne on the site now included as site 001. The Council asks that Doncaster Council ensure that they have given due regard for the views and opinions of those local residents. 3. The Selby Road site is a large site and must be carefully developed with a range of appropriate mitigation measures incorporated to minimise the negative impacts of such a development on the surrounding area. The Council does however support and welcome economic growth in the area.” How very good of them to recognise and actually give the objectors of Selby Road (Site 001) a mention in their response and to ask for us to be considered when it’s developed, yet Site 160 is a flat total rejection but here they are now stating the developers of Selby Road will need to plant a few trees for the residents so we won’t see the warehouses !!!! I believe if I had not been at that Parish Council council meeting in September 2019 and made comments to the council members with objections as I have done on numerous occasion in the past four years regarding this...
land the response from them would have just been of support and no mention of residents fiercely opposing it. “7. The Local Plan does not adequately provide positive growth allocation for Moorends. The absence of planned growth in Moorends may only serve to see this settlement become further isolated than it may already be considered by some to be, and excluded from future investment. To this end the Plan has not been positively prepared in so far as Moorends is concerned.” The above reiterates support for Selby Road, it would be the nearest development to Moorends why should myself and other residents have to suffer having warehousing and distribution centres and all the heartache and negative affect it will have on our homes, families, outlook and general day to day lives just in the hope it will create a minimal amount of jobs for actually anyone who can do the work and get there on time, it’s certainly not guaranteed that local people from Thorne and Moorends will be employed, it’s so very wrong when it’s us that live here and we chose to live here for the reasons of being secluded, nice countryside views, the wildlife, the quiet, we are the ones that will suffer the most from it, how the hell is that fair, we are local to this area, this is a local Plan our views and concerns are important especially on a development of this scale, we don’t want Selby Road developed. “8. The Council is particularly concerned that the Thorne and Moorends Neighbourhood Plan was not actioned by DMBC when it was submitted for examination and referendum. The Neighbourhood Plan should have been adopted long before now and the Local Plan drafted with regard to it. Unfortunately long delays and omissions on the part of DMBC has meant that the Neighbourhood Plan has not gone forward and through the passage of time now requires modification before being formally submitted again. To this end it is believed that the plan has not been as positively prepared as it can be in taking account of local considerations. Please do not hesitate to contact Clerk to the Council Mr. Matthew Gleadell if you have any queries.” The Thorne and Moorends Neighbourhood Plan should not be passed it should be checked by an independent inspector, the questionnaires, summaries need to be looked at, it does not reflect the views of the local community I believe it has been done very tactical and it needs to be checked and certainly not actioned / accepted by DMBC.

Summary:
Object to allocation of site 001 Reasons: 1. NP does not represent the views of the community. 2. Can't understand why Town Council oppose Site 160 when all same reasons apply to site 001 which they support.

Response:
Consultation is an important part of the Local Plan process. The methods used are set out in the Council’s ‘Statement of Community Involvement (SCI)’. The SCI itself was subject to consultation. The ‘Local Development Scheme’ sets out the Local Plan process and progress and includes all stages where consultation has been undertaken. The Regulation 22 Statement of Consultation also shows when consultation was undertaken and the responses received and how it influenced the Local Plan process. All efforts have been made to inform and consult at various stages of the plan process. All consultation responses have an important role in the formation of the Local Plan. The Thorne Neighbourhood Plan does not allocate, support, reject or specifically mention any employment sites although it does support the allocation of sites in the M18 corridor. Any decisions regarding site allocations have also had regard to public consultation and the results of that consultation. Site 160 was originally proposed for allocation in the 2018 consultation. Based on responses to that consultation Site 160 was removed and Site 001 subsequently proposed for allocation.
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**Comment:**

Proposed sites crossed or in close proximity to National Grid infrastructure: Following a review of the above development plan, the following sites have been identified as being crossed or in close proximity to National Grid infrastructure. Further details are provided in the table overleaf. Electricity Transmission Site Ref: Site 001 Junction 6, M18 Throne North (Employment site) Asset Details: ZDA Route - 400Kv two circuit route from Keadby substation in North Lincolnshire to 4VH042 tower in Doncaster Appendix Ref: ET374 Please see enclosed plan referenced ET374, & ET375 at Appendix 2. The proposed sites are crossed by a National Grid high voltage electricity transmission overhead line. (SEE EMAIL FOR Appendix 2) The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. You can find National Grid’s guidelines for developing near Over Head Lines here: https://www.nationalgrid.com/sites/default/files/documents/Development%20near%20overhead%20lines_0.pdf Electricity Distribution Northern Powergrid owns and operates the local electricity distribution network in Doncaster Council. Contact details can be found at www.energynetworks.org.uk.

**Summary:**

Site 001 is crossed by a National Grid high voltage electricity transmission overhead line (ZDA Route - 400Kv two circuit route from Keadby substation in North Lincolnshire to 4VH042 tower in Doncaster). The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed.

**Response:**

Comments noted. Any Planning Application would deal with site specific issues such as this.
Proposed sites crossed or in close proximity to National Grid infrastructure: Following a review of the above development plan, the following sites have been identified as being crossed or in close proximity to National Grid infrastructure. Further details are provided in the table overleaf.

Electricity Transmission Site Ref: Site 441 Land at Carcroft Common, Carcroft, Skellow (Employment site) Asset Details: ZZG Route - 275kv two circuit route from Thorpe Marsh substation in Doncaster to West Melton substation in Rotherham Appendix Ref: ET375 Please see enclosed plan referenced ET374, & ET375 at Appendix 2. The proposed sites are crossed by a National Grid high voltage electricity transmission overhead line. (SEE EMAIL FOR Appendix 2) The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. You can find National Grid’s guidelines for developing near Over Head Lines here: https://www.nationalgrid.com/sites/default/files/documents/Development%20near%20overhead%20lines_OH.pdf Electricity Distribution Northern Powergrid owns and operates the local electricity distribution network in Doncaster Council. Contact details can be found at www.energynetworks.org.uk.

Summary:
Site 441 is crossed by a National Grid high voltage electricity transmission overhead line (ZZG Route - 275kv two circuit route from Thorpe Marsh substation in Doncaster to West Melton substation in Rotherham). The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed.

Response:
The published evidence base behind the site selection (see Site Selection Methodology) details the reasons why sites have been proposed for allocation or rejected. See also the Sustainability Assessment (Wood 2018) which details the independent SA analysis, and Employment Land Review (Colliers) in the evidence base.
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<td>Comment: We already have more than enough large warehouses in this area of Thorne and do not need more as they are enormous ugly buildings which spoil the countryside, and create numerous problems due to the excessive increase in heavy goods vehicles travelling along local roads. There are surely more suitable places within the borough with even better motorway access for them to be built and well away from residential properties. Already the area surrounding Junction 6 of the M18 motorway is causing traffic problems due to congestion, noise and particularly poor air quality. No doubt you are already aware of the extremely hot spells we have experienced during the last two summers, and with climate change these are more likely to be the 'norm' The residents in this area have suffered a great deal during the hot summers as we are now unable to keep windows and doors open to let in fresh air and cool our homes, or even spend time in our gardens due to the dust, dirt/grit and air pollution and noise already passing through the A614 and along the M18 motorway. Also the exhaust fumes and noise from large vehicles is exacerbated even further when these vehicles have to wait at the traffic lights now installed on Selby Road. My home is very close to the M18 roundabout where we have vehicles producing noise and vibrations inside my home. There are already residents living in this vicinity suffering from asthma and respiratory problems, and an increase in air pollution will only serve to exacerbate this. There will be a loss of high quality agricultural land needed to grow food, and it will also have a very serious impact on the wildlife as the area is part of the Humberhead Levels. Site 001 is Flood zone 3, with 183 acres of floodplain and approximately 80 metres from the River Don. With climate change more areas are flooding and there is a need for these flood plains in Thorne and Moorends. There are no safe pedestrian/cycle routes identified to Site 001 and is definitely not a specific site identified for employment by the local community in the Neighbourhood Plan. The Government keep informing us that the air quality and pollution in the environment in which we all live is a very serious matter, it should be top most in our minds with regard to the health of our nation and future generations, and should not be dealt with lightly.</td>
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<td>Summary: Legally compliant - no comment Sound - no comment Too many large warehouses in Thorne. Will increase HGV traffic. Better places with better access to motorway elsewhere away from residential area. Traffic problems M18 J6 cause to congestion, noise, poor air quality vibration to homes. Climate change will bring hot weather and can’t open windows and doors to cool homes, or spend time in gardens due to the dust and air pollution. Air pollution causes asthma. Loss of high quality agricultural land. Impact on Humber levels wildlife. Site 001 is in flood zone 3 and floodplain. No safe pedestrian/cycle routes identified to Site 001</td>
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<td>Response: The comments against Site 001 are noted.</td>
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Policy 4: Employment Allocations

Tests of Soundness:
- Positively prepared
- Effective
- Justified
- Consistent with national

Comment:

These two policies are considered collectively for the avoidance of repetition. The employment allocations with permission as at 1st April 2018 (included in Policy 4) are contained within Table E2 of the Local Plan 2019 Publication Draft. (SEE EMAIL FOR Figure 1: Emerging plan Extract) The existing employment areas (covered by Policy 5) are set out at paragraph 16.58 and include: There are a number of existing employment sites including: - West Moor Park - an expanding employment area which a range of businesses including nationally significant distribution warehousing and retail companies - Rands Lane - adjacent to West Moor Park, established area with a mix of business uses. Policy 5: Employment Policy Areas (Strategic Policy) states: Employment Policy Areas, as defined on the Policies Map, will continue to be supported primarily for employment uses. Other uses will be supported provided the following criteria are satisfied: A) it can be clearly demonstrated they support the existing or permitted employment uses on the site; or B) they are a specialist use appropriate to the site; or C) are a mix of commercial and/or community uses that provide clear additional benefits to the community. (Savills emphasis) In terms of the policy we are encouraged that the policy allows for mixed and/or additional uses to traditional employment uses. (SEE EMAIL FOR Figure 2 Emerging Local Plan Policies Map Extract) The Policies map extract above clearly shows the existing employment area and two employment allocations, denoted by the blue striped and cross hatched areas. The landowner has presented, on multiple occasions to the Council, evidence to demonstrate that the land to the south of Nutwell Lane is available and deliverable to bring forward a mixed use, employment led development. Within Armthorpe and the wider Borough, there is a clear, identified need for SME’s in the locality. The site at Nutwell South (149) is ideally located in this respect. However, it should also be emphasised that Site 149 also has the ability to unlock vital infrastructure in the form of the much-needed bypass for the village of Armthorpe, particularly given the first phase of the adjacent West Moor Park development is now built out. Further, the A630 West Moor Link improvement scheme was approved to include a new bridge, improve the width of the A18 carriageway and junction improvements. In addition to this, the work on the A18/A630 regeneration scheme started in July 2019. The proposed employment provision is to accommodate small and medium enterprises (SMEs) which is a different offer to the more traditional employment land uses, notably B2 and B8 uses, contained within the adopted and emerging Development Plan documents. Neither the Local Plan nor the Armthorpe Neighbourhood Plan make an allowance for SMEs. On this basis, it is considered that the Plan as drafted is not currently positive or effective. No revisions have been made since the Informal Consultation in October 2018 irrespective of previous representations requesting further consideration in this respect. As set out in previous representations, the increase in SMEs should be encouraged in order to accommodate and boost the number of new and growing industries and Government funding has been made available specifically for ‘Enhancing the Competitiveness of Small and Medium Sized Enterprises in the Sheffield City Region’. In summary, this mixed-use site could provide much needed sustainable development opportunities as is required within Armthorpe and the wider Borough, given the site sits within a highly sought after, sustainable location. Having established the above, DMBC should consider the site to be a highly sustainable, deliverable and developable allocation which should be supported for mixed use development within the emerging DMBC Local Plan, which provides a much-needed alternative offer for Doncaster. In order to satisfy the four tests of soundness as is required in the Plan making process, the plan should be based on evidence and be an appropriate strategy for the Borough when considered against other reasonable alternatives. It is concerning that there is no reasonable evidence to discount the site, particularly when compared to the sites which have been allocated in the draft Plan. The Site Assessment Methodology (SAM) was published in August 2019 and followed a six-stage process in order to provide a summary of the main evidence base and its conclusion, stating why sites have either fallen out of the process or progressed to the next stage. We consider that the evidence presented to support this assessment is flawed and clearly lacking detail. On this basis the evidence base cannot be deemed to be ‘sound’. Further, the evidence presented to support growth to the north of the village is also flawed, for the reasons set out below: - Site 149 has only been assessed as an employment site, as opposed to a mixed-use site. This is concerning given it has always been promoted in past representations as a mixed-use site. Further it was identified by the Council as a mixed use site in its HELAA. - There are a number of sites which have been allocated, which have scored similarly to Nutwell South within the SAM. - There are sites with severe constraints, which the Council have accepted can be overcome, but the constraints in site 149 are deemed to be too severe to overcome, a stance that we strongly reject as discussed below. Within the SAM, Site 149 was found to have significant negative effects in terms of pollution to surface water bodies and groundwater sources, however there is no definitive evidence which supports the Councils justification in this respect. Notwithstanding this, these are simply technical constraints which can easily be overcome through an agreed surface water drainage strategy and other technical work in due course. In line with the above methodology, the following allocated sites should be reassessed along with Site 149, in order to ensure that the Local Plan and its evidence base is justified and consistent in the site selection methodology. - Site 941 (Land East of Poplars Farm) - HELAA identified it as not suitable for housing, the site was similarly assessed to Site 149 as having Surface Water Pollution Issues. - Site 155 (Leach Land Industrial Estate) - significant negative effects in relation to unstable land. It is profoundly clear that the above sites which were also found to have significant negative effects in the SAM, yet were still allocated, should be re-considered until the DMBC can provide the evidence as to why they were allocated but others discounted on the same basis. The above sites are identified as having constraints which could also impact on their deliverability in the short- medium term given the likely challenges of obtaining planning consent for development in this respect. The evidence base to support draft allocation of Site 941 is considered to be unjustified given this site was assessed on a similar basis to Site 149 within both the HELAA and SAM. A further concern is the
allocation of site 1032 (Land at Bankwood Lane) which was allocated on the basis that the site is located within a successful employment area, however, Site 1032 also has identified issues with pollution to surface water bodies and biodiversity issues. This is a confused stance, given that the Nutwell Lane site is also within a proven successful employment location, as evidenced within the Local Plan at paragraph 16.54. There appears to be a lack of consistency in the site selection and assessment approach in this respect. On review of the Sustainability Appraisal (June 2019) it appears that Site 149 has not been progressed based on national policy grounds and on other sustainability criteria, including distances of the site to schools, infrastructure and bus stops. This is a very simplistic approach to measuring the sustainability of a site’s location. Planning obligations can be attached to proposed developments to ensure additional bus stops, pedestrian and cycle routes etc are included as part of any prospective development proposal. The newly completed development of the road adjacent to the site at West Moor Park may also assist in reducing travel time and through additional bus stop provision in this respect. A mixed use site also provides the opportunity to increase this shops and services (infrastructure) offer within the local area. The principle of employment uses on sites within Flood Zones 2 & 3 is not considered to be contrary to national policy, albeit it is accepted that residential development is deemed a more vulnerable use in this context. Notwithstanding this, should any residential development be proposed within Flood Zone 2, such a vulnerable use can be considered to be appropriate providing the sequential test can be satisfied. In any event, it is considered that appropriate technical solutions can be achieved to mitigate against any risk of flooding on site, in the form of attenuation tanks and balancing ponds should a detailed development proposal be progressed in due course. As demonstrated on the indicative masterplan appended, the western part of the site is proposed to come forward for residential development in the medium-long term. This would fall primarily on land allocated as flood zone 1 and therefore land which is considered to be entirely appropriate for such a use. It's strongly considered that there has been a degree of inconsistency in assessing the sites and within the overall conclusions made as part of the emerging Plan and as discussed above, the SAM. Figure 2, which is outlined below, is taken from the Housing and Employment Site Selection Methodology and Results Report (September 2018). This shows Nutwell South site as being a ‘rejected’ whilst the sites to the north of Armthorpe as ‘Remaining Options post HELAA but not proposed for allocation’ and therefore, such sites are shown as still having potential for development. This is despite them also being allocated within Flood Zone 3. As such, we see no reason why Site 149 has been discounted for employment use on such merits. Figure 3 as set out overhead is taken from the Local Plan Informal Consultation 2018: Proposed Employment land allocations. This plan identifies the land to the north of Armthorpe designated within Flood Zone (SEE EMAIL FOR Figure 3: extract from Housing and Employment Site Selection Methodology and Results Report Figure 4: extract from Local Plan Informal Consultation 2018. Proposed Employment land allocations. Area: Armthorpe) Figure 4, which forms part of the Council’s evidence base, corroborates our interpretation of flood risk on the site. On this basis, it is considered that Site 149 should be given further assessment in light of the flood risk evidence put forward in these representations and those submitted in previous years, which, much to the disappointment and frustration of our client, appear to have been completely ignored. The Council’s evidence base does not support the justification for discounting Site 149 in this respect.

Summary:

Policies 4 and 5 - a summary of these policies is included. We are encouraged that the policy allows for mixed and/or additional uses to traditional employment uses. There is a clear, identified need for SMEs within the borough/Armthorpe and site 149 is ideally located for this. It also has the ability to unlock vital infrastructure i.e. a much needed Armthorpe bypass. The proposed SME provision for this site is a different offer as the Local Plan and the Neighbourhood Plan do not currently make an allowance for SMEs. The Publication Local Plan is not positive or effective. An increase in SMEs should be encouraged to accommodate and boost the number of new and growing industries. Government funding has been made available specifically for 'Enhancing the Competitiveness of Small and Medium Sized Enterprises in the Sheffield City Region'. The Council should consider Site 149 as highly sustainable, deliverable and developable and support it as a mixed use development. The Plan should be based on evidence and an appropriate strategy as there is no reasonable evidence to discount the site. The Site Assessment Methodology is flawed and lacking detail for this site. The evidence base cannot be found sound and the evidence to support growth to the north of the village is also flawed. The reasons are: - Site 149 has only been assessed as an employment site and not a mixed use site. Although has been identified as a mixed-use site in HELAA. - There are a number of allocated sites which has scored similarly to Nutwell South (site 149). - Some sites have constraints which the Council say can be overcome, but constraints for site 149 are deemed to be too severe. We object to this. The Site Selection Methodology finds site 149 has having significant negative effects in terms of pollution to surface water bodies and groundwater sources. There is no definitive evidence for this and they are simply technical constraints which can easily be overcome. The following sites also have constraints which could impact on their deliverability in the short term and they should be reassessed along with Site 149 to ensure the evidence base is justified and consistent: - Site 941 (Land East of Poplars Farm) - HELAA identified it as not suitable for housing, the site was similarly assessed to Site 149 as having Surface Water Pollution Issues - Site 155 (Leach Land Industrial Estate) - significant negative effects in relation to unstable land The evidence base to support draft allocation of Site 941 is considered to be unjustified given this site was assessed on a similar basis to Site 149 within both the HELAA and Site Selection Methodology. It is also concerning that site 1032 (Bankwood Lane) has been allocated on the basis that the site is within successful employment area, however it also has issues with pollution to surface water bodies and biodiversity issues. This is confused given that Nutwell Lane is also within a successful employment location. There is a lack of consistency in approach. After reviewing the Sustainability Appraisal it appears that site 149 has not been progressed based on national policy grounds and other sustainability criteria including distances to schools, infrastructure and bus stops. This is a very simplistic approach. Planning obligations can be attached to developments to ensure additional bus stops, cycles routes etc are included as part of development proposals. The principle of employment uses in sites in Flood Zones 2 & 3 is not considered to be contrary to national policy. It is accepted that residential development is deemed more vulnerable in this context. The indicative masterplan appended to the representation, shows residential development in the medium-long term on the western part of the site. This is primarily within flood zone 1 and therefore appropriate. The Site Selection Methodology (Nov 2018) shows Nutwell Lane (ref 149) as being 'rejected' whilst sites to the north of Armthorpe as 'Remaining options post HELAA but not proposed for allocation'. Therefore these sites are still shown as having potential for development although they are in Flood Zone 3. Why has site 149 been discounted for employment on such merits? The Local Plan Informal Consultation proposed allocations identifies land to the north of Armthorpe as flood zone 3 and corroborates our interpretation of flood risk on the site. It is considered that Site 149 assessed further in light of the flood risk evidence put forward in these and previous representations. The Council’s evidence base does not support the justification for discounting Site 149.

Response:

The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites.
Comment Ref: C/Policy 5/05008/1/008
Attend Examination: Attend Hearing
Reason: Please See Cover Letter - We would welcome the opportunity to attend and participate at the EiP on behalf of our client in due course.
Area: Chapter 4: Strategic Approach
Policy: Policy 4: Employment Allocations
Tests of Soundness: Positively prepared
Comment: These two policies are considered collectively for the avoidance of repetition. The employment allocations with permission as at 1st April 2018 (included in Policy 4) are contained within Table E2 of the Local Plan 2019 Publication Draft. (SEE EMAIL FOR Figure 1 : Emerging plan Extract)

The existing employment areas (covered by Policy 5) are set out at paragraph 16.58 and include: There are a number of existing employment sites including: - West Moor Park - an expanding employment area which a range of businesses including nationally significant distribution warehousing and retail companies - Rands Lane - adjacent to West Moor Park, established area with a mix of business uses. Policy 5: Employment Policy Areas (Strategic Policy) states: Employment Policy Areas, as defined on the Policies Map, will continue to be supported primarily for employment uses. Other uses will be supported provided the following criteria are satisfied: A) it can be clearly demonstrated they support the existing or permitted employment uses on the site; or B) they are a specialist use appropriate to the site; or C) are a mix of commercial and/or community uses that provide clear additional benefits to the community. [Savills emphasis] In terms of the policy we are encouraged that the policy allows for mixed and/or additional uses to traditional employment uses. (SEE EMAIL FOR Figure 2 Emerging Local Plan Policies Map Extract) The Policies map extract above clearly shows the existing employment area and two employment allocations, denoted by the blue striped and hatched areas. The landowner has presented, on multiple occasions to the Council, evidence to demonstrate that the land to the south of Nutwell Lane is available and deliverable to bring forward a mixed use, employment led development. Within Armthorpe and the wider Borough, there is a clear, identified need for SME’s in the locality. The site at Nutwell South (149) is ideally located in this respect. However, it should also be emphasised that Site 149 also has the ability to unlock vital infrastructure in the form of the much-needed bypass for the village of Armthorpe, particularly given the first phase of the adjacent West Moor Park development is now built out. Further, the A630 West Moor Link improvement scheme was approved to include a new bridge, improve the width of the A18 carriageway and junction improvements. In addition to this, the work on the A18/A630 regeneration scheme started in July 2019. The proposed employment provision is to accommodate small and medium enterprises (SMEs) which is a different offer to the more traditional employment land uses, notably B2 and B8 uses, contained within the adopted and emerging Development Plan documents. Neither the Local Plan nor the Armthorpe Neighbourhood Plan make an allowance for SMEs. On this basis, it is considered that the Plan as drafted is not currently positive or effective. No revisions have been made since the Informal Consultation in October 2018 irrespective of previous representations requesting further consideration in this respect. As set out in previous representations, the increase in SMEs should be encouraged in order to accommodate and boost the number of new and growing industries and Government funding has been made available specifically for ‘Enhancing the Competitiveness of Small and Medium Sized Enterprises in the Sheffield City Region’. In summary, this mixed-use site could provide much needed sustainable development opportunities as is required within Armthorpe and the wider Borough, given the site sits within a highly sought after, sustainable location. Having established the above, DMBC should consider the site to be a highly sustainable, deliverable and developable allocation which should be supported for mixed use development within the emerging DMBC Local Plan, which provides a much-needed alternative offer for Doncaster. In order to satisfy the four tests of soundness as is required in the Plan making process, the plan should be based on evidence and be an appropriate strategy for the Borough when considered against other reasonable alternatives. It is concerning that there is no reasonable evidence to discount the site, particularly when compared to the sites which have been allocated in the draft Plan. The Site Assessment Methodology (SAM) was published in August 2019 and followed a six-stage process in order to provide a summary of the main evidence base and its conclusion, stating why sites have either fallen out of the process or progressed to the next stage. We consider that the evidence presented to support this assessment is flawed and clearly lacking detail. On this basis the evidence base cannot be deemed to be ‘sound’. Further, the evidence presented to support growth to the north of the village is also flawed, for the reasons set out below: - Site 149 has only been assessed as an employment site, as opposed to a mixed-use site. This is concerning given it has always been promoted in past representations as a mixed-use site. Further it was identified by the Council as a mixed use site in its HELAA. - There are a number of sites which have been allocated, which have scored similarly to Nutwell South within the SAM. - There are sites with severe constraints, which the Council have accepted can be overcome, but the constraints in site 149 are deemed to be too severe to overcome, a stance that we strongly reject as discussed below. Within the SAM, Site 149 was found to have significant negative effects in terms of pollution to surface water bodies and groundwater sources, however there is no definitive evidence which supports the Councils justification in this respect. Notwithstanding this, these are simply technical constraints which can easily be overcome through an agreed surface water drainage strategy and other technical work in due course. In line with the above methodology, the following allocated sites should be reassessed along with Site 149, in order to ensure that the Local Plan and its evidence base is justified and consistent in the site selection methodology. - Site 941 (Land East of Poplars Farm) - HELAA identified it as not suitable for housing, the site was similarly assessed to Site 149 as having Surface Water Pollution Issues. - Site 155 (Leach Land industrial Estate) - significant negative effects in relation to unstable land. It is profoundly clear that the above sites which were also found to have significant negative effects in the SAM, yet were still allocated, should be re-considered until the DMBC can provide the evidence as to why they were allocated but others discounted on the same basis. The above sites are identified as having constraints which could also impact on their deliverability in the short - medium term given the likely challenges of obtaining planning consent for development in this respect. The evidence base to support draft allocation of Site 941 is considered to be unjustified given this site was assessed on a similar basis to Site 149 within both the HELAA and SAM. A further concern is the
allocation of site 1032 (Land at Bankwood Lane) which was allocated on the basis that the site is located within a successful employment area, however, Site 1032 also has identified issues with pollution to surface water bodies and biodiversity issues. This is a confused stance, given that the Nutwell Lane site is also within a proven successful employment location, as evidenced within the Local Plan at paragraph 16.54. There appears to be a lack of consistency in the site selection and assessment approach in this respect. On review of the Sustainability Appraisal (June 2019) it appears that Site 149 has not been progressed based on national policy grounds and on other sustainability criteria, including distances of the site to schools, infrastructure and bus stops. This is a very simplistic approach to measuring the sustainability of a site's location. Planning obligations can be attached to proposed developments to ensure additional bus stops, pedestrian and cycle routes etc are included as part of any prospective development proposal. The newly completed development of the road adjacent to the site at West Moor Park may also assist in reducing travel time and through additional bus stop provision in this respect. A mixed use site also provides the opportunity to increase this shops and services (infrastructure) offer within the local area. The principle of employment uses on sites within Flood Zones 2 & 3 is not considered to be contrary to national policy, albeit it is accepted that residential development is deemed a more vulnerable use in this context. Notwithstanding this, should any residential development be proposed within Flood Zone 2, such a vulnerable use can be considered to be appropriate providing the sequential test can be satisfied. In any event, it is considered that appropriate technical solutions can be achieved to mitigate against any risk of flooding on site, in the form of attenuation tanks and balancing ponds should a detailed development proposal be progressed in due course. As demonstrated on the indicative masterplan appended, the western part of the site is proposed to come forward for residential development in the medium-long term. This would fall primarily on land allocated as flood zone 1 and therefore land which is considered to be entirely appropriate for such a use. It's strongly considered that there has been a degree of inconsistency in assessing the sites and within the overall conclusions made as part of the emerging Plan and as discussed above, the SAM. Figure 2, which is outlined below, is taken from the Housing and Employment Site Selection Methodology and Results Report (September 2018). This shows Nutwell South site as being a 'rejected' whilst the sites to the north of Armithorpe as 'Remaining Options post HELAA but not proposed for allocation' and therefore, such sites are shown as still having potential for development. This is despite them also being allocated within Flood Zone 3. As such, we see no reason why Site 149 has been discounted for employment use on such merits. Figure 3 as set out overhead is taken from the Local Plan Informal Consultation 2018: Proposed Employment land allocations. This plan identifies the land to the north of Armithorpe designated within Flood Zone (SEE EMAIL FOR Figure 3: extract from Housing and Employment Site Selection Methodology and Results Report Figure 4: extract from Local Plan Informal Consultation 2018. Proposed Employment land allocations. Area: Armithorpe) Figure 4, which forms part of the Council's evidence base, corroborates our interpretation of flood risk on the site. On this basis, it is considered that Site 149 should be given further assessment in light of the flood risk evidence put forward in these representations and those submitted in previous years, which, much to the disappointment and frustration of our client, appear to have been completely ignored. The Council’s evidence base does not support the justification for discounting Site 149 in this respect.

Summary:

Policies 4 and 5 - a summary of these policies is included. We are encouraged that the policy allows for mixed and/or additional uses to traditional employment uses. There is a clear, identified need for SMEs within the borough/Armithorpe and site 149 is ideally located for this. It also has the ability to unlock vital infrastructure i.e. a much needed Armithorpe bypass. The proposed SME provision for this site is a different offer as the Local Plan and the Neighbourhood Plan do not currently make an allowance for SMEs. The Publication Local Plan is not positive or effective. An increase in SMEs should be encouraged to accommodate and boost the number of new and growing industries. Government funding has been made available specifically for ‘Enhancing the Competitiveness of Small and Medium Sized Enterprises in the Sheffield City Region’. The Council should consider Site 149 as highly sustainable, deliverable and developable and support it as a mixed use development. The Plan should be based on evidence and an appropriate strategy as there is no reasonable evidence to discount the site. The Site Assessment Methodology is flawed and lacking detail for this site. The evidence base cannot be found sound and the evidence to support growth to the north of the village is also flawed. The reasons are: - Site 149 has only been assessed as an employment site and not a mixed use site. Although has been identified as a mixed-use site in HELAA. - There are a number of allocated sites which has scored similarly to Nutwell South (site 149). - Some sites have constraints which the Council say can be overcome, but constraints for site 149 are deemed to be too severe. We object to this. The Site Selection Methodology finds site 149 has having significant negative effects in terms of pollution to surface water bodies and groundwater sources. There is no definitive evidence for this and they are simply technical constraints which can easily be overcome. The following sites also have constraints which could impact on their deliverability in the short term and they should be reassessed along with Site 149 to ensure the evidence base is justified and consistent: - Site 941 (Land East of Poplars Farm) - HELAA identified it as not suitable for housing, the site was similarly assessed to Site 149 as having Surface Water Pollution Issues - Site 155 (Leach Land Industrial Estate) - significant negative effects in relation to unstable land. The evidence base to support draft allocation of Site 941 is considered to be unjustified given this site was assessed on a similar basis to Site 149 within both the HELAA and Site Selection Methodology. It is also concerning that site 1032 (Bankwood Lane) has been allocated on the basis that the site is within successful employment area, however it also has issues with pollution to surface water bodies and biodiversity issues. This is confused given that Nutwell Lane is also within a successful employment location. There is a lack of consistency in approach. After reviewing the Sustainability Appraisal it appears that site 149 has not been progressed based on national policy grounds and other sustainability criteria including distances to schools, infrastructure and bus stops. This is a very simplistic approach. Planning obligations can be attached to developments to ensure additional bus stops, cycles routes etc are included as part of development proposals.

The principle of employment uses in sites in Flood Zones 2 & 3 is not considered to be contrary to national policy. It is accepted that residential development is deemed a more vulnerable use in this context. The indicative masterplan appended to the representation, shows residential development in the medium-long term on the western part of the site. This is primarily within flood zone 1 and therefore appropriate. The Site Selection Methodology (Nov 2018) shows Nutwell Lane (ref 149) as being 'rejected' whilst sites to the north of Armithorpe as 'Remaining options post HELAA but not proposed for allocation'. Therefore these sites are still shown as having potential for development although they are in Flood Zone 3. Why has site 149 been discounted for employment on such merits? The Local Plan Informal Consultation proposed allocations identifies land to the north of Armithorpe as flood zone 3 and corroborates our interpretation of flood risk on the site. It is considered that Site 149 assessed further in light of the flood risk evidence put forward in these and previous representations. The Council’s evidence base does not support the justification for discounting Site 149.

Response:

The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites. It should also be noted that the employment allocation of 481 ha is for the borough and caters for a range in size and type of units and businesses including SMEs.
Policy 4 identifies sites for employment uses and specifies the employment use types that would be supported. Policy 5 supports employment policy areas for employment uses. Minerals can only be worked where they occur. However, it is acknowledged that hydrocarbons can be won using alternative techniques such as directional drilling where conditions allow. Opposition to hydrocarbon developments often orientates around locational factors such as proximity to residential properties and in countryside areas access and landscape impact. As a consequence, the industry is often encouraged or redirected to industrial areas. It is therefore important that the Policies are flexible to allow other uses on the land allocations that may not fall within the identified use classes and particularly which may be temporary in nature, small in footprint and would not prejudice the longer term intention for development.

Summary:
Policy 4 identifies sites for employment uses and specifies the employment use types that would be supported. Policy 5 supports employment policy. Hydrocarbons can be won using directional drilling and industry is redirected to industrial areas. The policy needs to be flexible to allow for other use classes, especially if they are temporary.

Response:
Comment noted. It is important to note the local plan should be read as a whole and other uses will be permitted where relevant considerations have been addressed.
I object to Site 001 Thorne North Junction 6 M18 proposed as Employment Land. Site 001 is Flood Zone 3, it is 182 acres of floodplain, it is approximately 80m from the River Don, with climate change more areas are flooding, we need our floodplains. The DMBC Air Pollution Control Officer does not support development on this land, and increased traffic will worsen already poor air pollution in this area if developed. Traffic through the centre of Thorne is already shocking and the inevitable HGVs and other industrial traffic that elect to go through the centre of town will make things even worse. The whole area is part of The Humberhead Levels, it will have a devastating impact on all wildlife including protected species that live and hunt on it. Loss of high quality Grade 3 - "very good" agricultural land, we need this land to grow food. A vast area of countryside would be lost, replaced by gigantic ugly sheds on the approach to Thorne. There are deer on the fields and they would lose some of their environment if this development went ahead. The land lies outside the urban frame, it is the wrong side of the motorway, it is not a sustainable urban extension. No safe pedestrian/cycle routes can be identified to Site 001. We have enough warehouses in Thorne and we do not need anymore. It is most definitely not a specific site identified for employment by the local community in the Neighbourhood Plan. My family and I have lived on Waterside by Junction 6 for almost 3 years and even in that time the volume of traffic (in both senses) has grown enormously. It is very difficult and dangerous to cross the slip roads already if we want to walk to Aldi or in to Thorne and allowing this development will only make that worse. Isn't it time that the planning office accepted that Thorne and the surrounding areas are full and cannot sustain any more development?!
2.1 Policy 4: “Employment Allocations” (Strategic Policy) states that the sites shown on the Policies Map, will be allocated for employment uses in accordance with three set principles. It is considered that the "principle" element of policy 4 to be sound and legally compliant. 2.2 However, the Local Plan’s designation of employment sites as shown on the Policies Map, is considered to be un-sound. This judgment has been made on the basis that in its current form the scale of designated employment sites is not justified within the Local Plan document and the Local Plan cannot be effective in delivering those sites in a sustainable manner. 2.3 Policy 3 “Level and Distribution of Growth (Strategic Policy)” states that it is the Local Plan’s strategic aim to facilitate the delivery of at least 481 hectares of employment land over the plan period (2015- 2035). 2.4 In the 2018 version of the draft local plan, DMBC had previously justified their figure of 407 hectares by stating that it was derived within the Economic Forecasts and Housing Needs Assessment (Peter Brett Associates, May 2018). Within the Employment Land Needs Assessment (ELNA) Update 2019 this number has now risen to 481 hectares of employment land. It is argued that this is required because the plan period has now been extended by 3 years from 2032 to 2035, and is based on the following calculation: - Land requirement for 17 years (2015-2032) = 409 ha. - Three additional years (pro-rata) = (409/17) X 3 = 72 ha. - Revised land requirement (2015-2035) = (409 + 72) = 481 ha. 2.5 The assumption that 72 ha will be needed for those three years has not been based on clear evidence of need. It is simply a basic calculation that utilises present circumstances to determine what will be needed years in to the future. 2.6 Within DMBC’s Employment Land Needs Assessment (ELNA) Update 2019 it is stated: Whilst it is accepted that warehousing/logistics has helped boost the economy over the last few years, there is now a recognition at the regional and local level that there is a need to diversify the economic offer in the borough such as ensuring that high value jobs are created in areas such as engineering, digital and creative, and advanced materials. This will require other employment uses being provided in the borough, so the right sites need to be delivered at the right time as stated in national guidance. (7.2) 2.7 It is also stated (on page 11) within the Local Plan (2019) that there are a number of weaknesses facing the borough, including: - Relatively low proportion of jobs in creative industries and the knowledge economy - The town centre has lost ‘critical mass’ as investments across the Borough draw people and jobs away from the centre. - Relatively low job/business density - The borough has a higher than average carbon footprint, mainly due to transport uses. 2.8 We consider that this aim of diversifying the local economy is not followed through in the draft policies and allocations, and an issue with the Local Plan’s approach to employment is its designation of too many sites for warehousing and logistics. 2.9 As RPS previously noted in their 2018 representations to DMBC, the land allocated for employment uses in the current draft of the Local Plan may be unviable for Doncaster’s long-term economic growth. Peter Brett’s economic forecast (2018) also outlined potential issues with an oversupply of employment land: 3.22 - If land is to be over-allocated over and above the expected demand, the quantum of overallocation is a matter of judgment. A typical choice seems to be an uplift of around 30%. But the right answer will depend on local circumstances. It is important to avoid excessive oversupply, because if supply is too far above demand individual sites may not have a reasonable prospect of being taken up, which would go against para 22 of the NPPF. Also, if the land concerned is in demand for alternative uses or requires infrastructure investment, then it will be inefficient to reserve it for employment uses which may not materialise. 2.10 In contrast to the above statements, many of the employment sites that are identified in the Polices Map (2019) are in locations that would be primarily appropriate for warehousing/logistics (Use class B8); a use that is already dominant in the borough. A number of sites have been granted planning permission outside the town centre and are likely to be marketed for B8 uses. The sites below have been allocated as employment allocations but do not have planning permission and are located far from the centre: - 441 - Land at Cask Common, Carkcross: Employment Allocation. - 001 - Junction 6 M18, Thorne North: Employment Allocation. - 941 - Site 2, Land East of Poplars Farm, Hurst Lane, Auckley: Employment Allocation. (SEE EMAIL FOR plan of sites) 2.11 Furthermore, if DMBC do manage to diversify the local economy (as set out in ELNA 2019 para 7.2) then presumably smaller sites will be needed to be allocated for employment need than is currently required to meet the needs of the warehousing and logistics sector. 2.12 Within Doncaster’s publication Local Plan (2019), large, well-located brownfield land in urban areas and empty buildings are noted as an opportunity, as well as the re-development opportunities in and around Doncaster, including the town centre (page 12). 2.13 There is minimal evidence that Doncaster’s aspirations for a diverse economy has guided the employment land allocations. At present the designated employment allocations follow a pattern of development that is based on the site requirements of the logistics and warehousing industry. 2.14 An annual review of new job creations (looking at sector, location and required floor space) could be utilised by DMBC in order to effectively guide and justify the Local Plan. 2.15 In conclusion there is a disparity between DMBC’s vision for the borough as an economically diverse and balanced economy and the allocations the plan makes. DMBC should remove some of the employment allocated sites and allocate employment sites within, or closer to the existing town centres for employment use, and/or adopt a phased approach to the release of land suitable for B8 development (see below). This will promote a mix of uses in the borough and will assist potential developers and businesses in finding locations for B1 and B2 uses. 2.16 Overall RPS support the ambitions of Doncaster to become a “more important economic hub with a stronger, more balanced and productive economy”, however this balance can only be achieved through a deliverable and sustainable plan that allocates employment land appropriately.
Summary:

Policy 4  The principle element of Policy 4 is sound and legally compliant. However the Local Plan?s designation of employment sites is considered unsound. The scale of designated employment sites is not justified and the Local Plan cannot be effective in delivering those sites in a sustainable manner.  

Policy 3  The Council has increased its employment land requirement to 481 ha from 407 ha due to the plan period being extended. The assumption that 72 ha will be needed for those three years is not based on a clear evidence of need. It is a basic calculation that utilises present circumstances to determine what will be needed in the future. Paragraph 7.2 of the ELNA states there is a need to diversify the economic offer in the borough and that the right sites need to be delivered at the right time. The aim of diversifying the local economy is not followed through in the draft policies and allocations. The Local Plan designates too many sites for warehousing and logistics.  

The Peter Brett Report states it is ? important to avoid excessive oversupply, because if supply is too far above demand individual sites may not have a reasonable prospect of being taken up,?? Many of the locations identified on the Policies Map are primarily appropriate for warehousing/logistics; a use that is already dominant in the borough. Smaller sites are needed to diversify the economy. There is minimal evidence that Doncaster?s aspirations for a diverse economy has guided the employment allocations. The Council should remove some of the employment sites and allocate sites within or close to the existing town centres for employment use, and/or adopt a phased approach to the release of land suitable for B8 development. This will promote a mix of uses and assist in businesses finding locations for B1 and B2 uses.  

Response:

The 'Housing and Employment Site Selection Methodology and Results Report' states why the sites have been allocated to meet the forecast need to support jobs growth and economic ambitions. The forecast land requirement is based on work undertaken by Peter Brett Associates (PBA) (Economic Forecasts and Housing Needs Assessment) that looked at potential jobs growth across the Borough (detailed to 38 employment type sectors) up to 2032. A land requirement calculation (409 ha) was made based on the PBA forecasts. When extending the plan period by 3 years to 2035 it is not unreasonable to use the calculated annual rate for the years 2015 to 2032 (409/17 = 24ha) and multiply by 3 (24 x 3 = 72ha) to give the requirement for those 3 additional years.
5.1 RPS welcome iPort’s designation as a key proposal in the Local Plan, however the Local Plan will be most effective, and therefore sound, if it incorporates a site-specific policy for iPort. 5.2 Chapter 5 of the Local plan is focused on Doncaster Sheffield Airport. The airport is noted as an economic priority both for Doncaster and for the Sheffield City Region as a whole. Likewise, the economic importance of iPort has been recognised by DMBC and Sheffield City Region as one of the UK’s largest logistics developments. Doncaster iPort was developed following a long and productive working relationship with Doncaster Metropolitan Borough Council and Sheffield City Region, subsequently it has created jobs and contributed significantly to the local and regional economy. The long-term benefits of iPort are recognised in paragraph 16.119. of the Local Plan: When complete, it will provide 6 million square feet of warehousing and is expected to provide up to 5,000 new jobs, as well as local training opportunities. 5.3 Growth and investment at iPort should be supported more coherently through the Local Plan in order to enable its development and expansion. In order to sustain the regeneration gains already made within the Borough, iPort should be prioritised within the Local Plan in a similar way to the Airport. This policy should emphasise that logistics and warehousing development should be directed towards iPort, enshrining iPort as the preferable location for these uses.

**Summary:**
The Local Plan will be most effective and sound if it includes an iPort site-specific policy. Doncaster Sheffield Airport is recognised as a regional priority and has a separate Chapter/policy in the Local Plan. iPort is also a recognised as having economic importance to the local and regional economy. In order to sustain the regeneration gains already made in the borough, iPort should be prioritised in the Local Plan in a similar way to the Airport. The policy should emphasise that B8 uses should be directed towards iPort.

**Response:**
Noted. However its is not considered that iPort requires a separate Local Plan policy as it already benefits from planning permission which sets out the acceptable uses for the site.
3.1 DMBC should approach Employment Land supply through a rational and sustainable approach. At present the Local Plan is not sound in its approach towards managing Employment Land. Within policy 5: "Employment Policy Areas" the Local Plan should contain a section which invokes a scheme of phasing. Sites should be released gradually, in order to meet demand, avoiding excess supply of employment land. Overallocation of land is unsustainable in the long term, as land in Doncaster is a finite resource. A Local Plan that designates employment sites in a hierarchal fashion, applying practicality alongside regional vision will promote sustainable development, whilst guarding against the locality becoming dependent on one type of industry or business. 

3.2 In a letter (dated 29th December 2018) submitted to DMBC as a representation on a planning application (18/02759/OUTA), RPS concluded that the need for B8 warehousing cannot be assumed as a constant; in the longer-term the market has previously seen slowdowns and is ultimately directed by wider, regional/national economic forces. 

3.3 At the time of submission of the letter, there was evidence of limited demand for units from 100,000 to 200,000 sq.ft within the Borough of Doncaster. Since 2018 demand has continued to be limited; the IP2E unit has now been vacant for 28 months and the IP2G unit has been vacant for 12 months. 

3.4 With this in mind, DMBC should do their upmost to ensure development is directed towards existing logistics and warehousing centres. 

3.5 Within Policy 7: "Doncaster Sheffield Airport and Business Park" it is stated that phasing will be utilised in order to regulate the development of a mixed-use urban extension on land to the southwest of Hayfield Green. 

3.6 RPS urge DMBC to take the same approach towards all the Borough’s employment allocations. Echoing paragraph 5.15 of the Local Plan, DMBC must ensure economic growth is achieved in a considered and balanced manner, in order that any growth is delivered in a sustainable way, and with potential negative impacts suitably mitigated.

Summary:

Policy 5 The Local Plan is not sound in managing its approach to Employment Land. Policy 5 should include phasing where sites will be released gradually so to meet demand and avoid an excess supply. A phasing approach would promote sustainable development and guard against Doncaster becoming dependant on one type of industry or business. Development should be directed towards existing logistics and warehousing centres. The Airport policy is a phasing policy and the Council should take the same approach towards all the borough’s employment allocations.

Response:

Noted. There is no requirement for a phased approach as this would hinder the market and would not be supported by national planning policy which states that planning policies should help create the conditions in which businesses can invest, expand and adapt.
Tests of Soundness:

Comment:
Each of the technical papers appended in support of this representation letter include a summary comparison of Thorne North (Site 001) and Gateway 180 (Site 160). It is clear from these summaries and the above commentary that the draft allocation of Site 001 does not represent the best option in planning terms and is consequently unsound. Site 160 should be reconsidered as it provides a deliverable option which is significantly more sustainable. The site is now in the control of Harworth Group Plc which has significant experience and track record of delivering large strategic employment sites, including state-of-the-art logistics and advanced manufacturing parks. We trust that the detail contained within these representations will be taken into account moving forward. Given the level of information presented we would like to arrange a meeting with Officers as soon as possible to discuss Site 160 in more detail. We look forward to hearing from you in relation to possible meeting dates.

Summary:
It is clear that the draft allocation of Site 001 does not represent the best option in planning terms and is consequently unsound. Site 160 should be reconsidered as it provides a deliverable option which is significantly more sustainable. The site is now in the control of Harworth Group Plc which has significant experience and track record of delivering large strategic employment sites, including state-of-the-art logistics and advanced manufacturing parks.

Response:
Noted. The published evidence base behind the site selection (see Site Selection Methodology) details the reasons why sites have been proposed for allocation or rejected. See also the Sustainability Assessment (Wood 2018) which details the independent SA analysis, and Employment Land Review (Colliers) in the evidence base.
We note the concerns of town residents, Thorne Moorends Ward Members, Thorne Moorends Town Council and Thorne Moorends Neighbourhood Plan Working Group in response to the proposed allocation of the site at the Draft Policies and Proposed Site consultation in October 2018 and that they strongly object. In summary their concerns comments relate to: - Loss of countryside; - Flood risk and surface run off; - Increase in traffic and congestion particularly through Thorne Town Centre; - Current road infrastructure is inadequate./ A614 junction is already congested; - Impact on wildife and habitats, including nightjar foraging habitats/proximity of site to Thorne & Hatfield Moors SAC; - Air quality issues; - Noise and light pollution; - Lack of pedestrian access and public transport services; - Too much warehousing already in Thorne/ existing industrial area already so no need for a further one; - Will create low skilled jobs that do not benefit the community; - Does not comply with the Neighbourhood Plan; - Site would be better suited as a golf course and attract tourism into the area; - Potential historical/archaeological importance as the site of 'Thorne Mere'; - Segregated from Thorne by railway line and canal/ site is isolated from the Town of Thorne and even more so than Moorends; - Loss of views/public amenity (walking/countryside); - Negative impact on house prices; - Permission has previously been refused on the site; - Any development should retain the existing hedgerow between the canal and the site; and - Development may compete with demand for Unity at Hatfield-Stainforth; A large majority of these are not material considerations. Those that are material planning considerations can be addressed through a range of measures. The Council is in receipt of various pieces of technical information submitted by Harworth during the emerging Local Plan consultation process and also within their own technical reports which demonstrate that the comments raised above can be addressed and therefore there are no technical constraints to the development of the site. We also note the comments from technical/statutory consultees; DMBC Pollution Control, Campaign to Protect Rural England and Natural England. Consultee: DMBC Pollution Control Comment: Thorne is at risk of being declared an Air Quality Management Area; Technical Information to address concern: This will be assessed within the ES which will be submitted as part of the forthcoming planning application. Consultee: Campaign to Protect Rural England Comment: Thorne & Moorends Neighbourhood Plan makes no reference to a major urban extension: what is envisaged? Large greenfield site here may draw development away from Unity site and therefore be inconsistent with NPPF 2018. Sustainability case not presented. Technical Information to address concern: See earlier section in relation to Policy 3 and also the Employment Land Need and Demand Assessment undertaken by Knight Frank dated September included within Appendix 3. Consultee: Natural England Comment: Recommend that potential hydrological impacts, traffic and industrial emissions and loss of foraging habitat for nightjar are considered in the Habitats Regulations Assessment for the plan. Advise that an ALC survey is undertaken to assess the sustainability of site 160 in relation to loss of productive agricultural land. Technical Information to address concern: See earlier section on Agricultural Land and also the Agricultural Land Assessment by Agricultural Systems Analysis Limited in Appendix 11. (SEE SERVER FOR Appendices)
Agricultural Land Assessment.

Response:
Noted.

| CUSREF: | 05190 | Name: | Carter Jonas |
| Date:   | 30/09/2019 | Organisation: | Carter Jonas |
|         |          | Representing: | Harworth Group |
| Comment Ref: | C/Employment Thorne/05190/1/013 |
| Attend Examination: | Not Stated |

Reason:

Area: Chapter 4: Strategic Approach
Policy: Policy 4: Employment Allocations

Tests of Soundness:

Comment:

With regards to the most suitable locations for employment uses which align with the criteria of Strategic Policy 3 we understand that a range of sites have been assessed since the Call for Sites in December 2014, the HELAA 2018 and Sustainability Appraisal. It is therefore clear from these sources that there are a number of sites which are unsuitable for development due to flood risk and location. It also highlights that there are inconsistencies with the Sustainability Appraisal Site Assessments in relation to the way in which sites were assessed and subsequently discounted or identified for allocation. This reinforces the concerns that we have in relation to the Council’s Site Selection Methodology which at the late stages of the Plan have been used to select Site 001 over Site 160. We therefore consider that the selection of Site 001 is unsound and unjustified. It is clear from a review of the Sustainability Appraisal and available technical information that the originally preferred Site 160, Bradholme Farm is the most suitable site for employment within the M18/M180 corridor near to Thorne as set out within our assessment below.

Summary:

Understand that a range of sites have been assessed and that a number of sites are unsuitable due to flood risk and location. There are inconsistencies with the Sustainability Appraisal Site Assessment in the way that sites have been assessed and subsequently discounted or identified for allocation. Consider the selection of Site 001 is unsound and unjustified.

Response:

The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites.
We welcome the acknowledgement of the need for an employment site near to Thorne and the M18/M180 Corridor. However, we have significant concerns in relation to the location and characteristics of this site which forms the draft allocation at Site 001, Junction 6 M18, Thorne North, which are set out in detail below. While the currently selected site at Thorne North (site 001) lies within the general M18/M180 motorway corridor zone it is generally disconnected from the Main settlement of Thorne/Moorends in terms of lack of connectivity by all sustainable travel modes. It does not possess the full locational advantages of the Gateway 180 site at junction 1 of the M180 which has unique characteristics in the context of Doncaster MD in that it is the site which best serves the Humber ports while also possessing all of the other market catchment advantages of the M18 sites. We question draft employment allocation Site 001, Thorne North for the following reasons:

- Rationale for the selection of the Site 001;
- Deliverability;
- Highways;
- Accessibility - Ecology;
- Flood Risk and Drainage;
- Earthworks;
- Landscape;
- Deliverability; and
- Comparison with other options

We welcome the acknowledgement of the need for an employment site near to Thorne and the M18/M180 Corridor but have significant concerns in relation to the location and characteristics of draft allocation Site 001. Although Site 001 is within the general M18/M180 motorway corridor, it is generally disconnected from Thorne/Moorends in terms of lack of connectivity by all sustainable travel modes. It does not have the locational advantages of Gateway 180. Gateway 180 has unique characteristics in that it best serves the Humber Ports while also possessing all the other market catchment advantages of the M18 sites. Site 001 is questioned for the following reasons:

Response:

Noted. The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions.
A pre-application enquiry was submitted in May 2019 in relation to this for a new scheme for up to 3,000,000 sq ft (278,709.12 sq m) of employment space (a mix of B1(c), B2 and B8 uses) with ancillary office space and associated servicing and infrastructure including car parking, vehicular and pedestrian circulation, construction of access roads, earthworks to create development platforms, public open space, landscaping and creation of drainage features, electrical substation and ecological works. Consultation responses were received from the following consultees, none of which raised any objections to the proposals: - Highways - Ecology - Heritage - Flood Risk - Contamination - Air Quality - Trees - PROW - Design A copy of the pre-application response letter is attached in Appendix 1 for reference. We note that the Council has not acknowledged the comments raised by the Inspector (identified above) in relation to the Countryside Policy Protection Area when considering the recent pre-application enquiry. (SEE SERVER FOR Appendices)

Summary:
A pre-application enquiry was submitted in May 2019 for a new scheme for up to 3,000,000 sq ft (278,709.12 sq m) of employment space (a mix of B1(c), B2 and B8 uses) with ancillary office space and associated servicing and infrastructure including car parking, vehicular and pedestrian circulation, construction of access roads, earthworks to create development platforms, public open space, landscaping and creation of drainage features, electrical substation and ecological works. Consultation responses were received from the following consultees, none of which raised any objections to the proposals: - Highways - Ecology - Heritage - Flood Risk - Contamination - Air Quality - Trees - PROW - Design It is noted that the Council has not acknowledged the comments raised by the Sites and Policies DPD Inspector in relation to Countryside Policy Protection Area when considering the recent pre-application enquiry.

Response:
Noted. It should be noted that this is a new plan with a new and revised evidence base in line with national guidance.
Comment:

Previous Planning Application Ref: 08/03189/FULM There is a detailed planning history in relation to the site and a significant number of studies were undertaken as part of the 2008 applications (Ref 08/00359/FULM and 08/03189/FULM) for the 'erection of strategic distribution centre (Class B8) with ancillary offices (Class B1), car parking, highway infrastructure, vehicle maintenance unit, vehicle wash and fuelling, drainage infrastructure including 2 no balancing ponds and landscaping'. The first application (Ref 08/00359/FULM) was withdrawn following adverse comments from a range of statutory consultees including the Environment Agency, Highways England and the Yorkshire and Humber Assembly. Additional technical work was undertaken in support of the revised application (08/03189/FULM) which was supported by the Highways Agency, the Environment Agency and Natural England and was recommended for approval by Officers (see Officers Report included within Appendix 9). At committee the application was overturned by Members and refused on the following grounds: "01. The application site is within the Countryside Policy Area (CPA) as designated in the adopted Doncaster Unitary Development Plan (UDP). The proposed development would conflict with the objectives of Policies ENV2 and ENV4 of the UDP since it would be a form of development which will not normally be permitted within the CPA. It would encroach upon open countryside and by reason of its nature, scale, siting and design it would, in the opinion of the Local Planning Authority, harm the character and appearance of the locality and prejudice the purposes of the CPA. The stated economic and social benefits of the local employment which could potentially be generated by the proposed development are considered insufficient to outweigh the harm referred to." It is therefore evident that there are no technical constraints to the development of this site and that the application was recommended for approval by Officers and refused by Planning Committee on policy grounds due to the status of the site in the existing Local Plan. However the Inspector’s comments in relation to the withdrawn Sites and Policies Development Plan document dated 3 June 2014 (see Appendix 12) should be noted and given weight going forward. The Letter identifies in paragraph 38 that: "Within the borough 'countryside' falls into 2 parts; Green Belt land to the west of Doncaster and 'Countryside Policy Protection Area' to the east of Doncaster. I was informed at the Hearings that there is no other 'countryside' which falls outside of these 2 designations. The use of the term 'Countryside Policy Protection Area' is misleading. The area so designated has not been assessed for its special qualities and there is no policy either in the Core Strategy or the DPD which gives it any special status. The land is simply countryside. Referring to it as anything else implies a status which it does not possess". It goes on to identify that "in the Council’s 'strategic sieve', countryside does not carry the same weight as Green Belt. This is proper in my view. However, it does carry the same weight as a Flood Zone 2 designation". (SEE SERVER FOR Appendices)

Summary:

Previous Planning Application Ref: 08/03189/FULM There is a detailed planning history in relation to the site and a significant number of studies were undertaken as part of the 2008 applications (Ref 08/00359/FULM and 08/03189/FULM) for the 'erection of strategic distribution centre (Class B8) with ancillary offices (Class B1), car parking, highway infrastructure, vehicle maintenance unit, vehicle wash and fuelling, drainage infrastructure including 2 no balancing ponds and landscaping'. The first application was withdrawn following adverse comments from a range of statutory consultees. Additional technical work was undertaken in support of the revised application (08/03189/FULM) which was supported by the Highways Agency, the Environment Agency and Natural England and was recommended for approval by Officers. At committee, the application was overturned by Members and refused due to the status of the site in the existing Local Plan. The Inspector’s comments in relation to the withdrawn Sites and Policies Development Plan document dated 3 June 2014 should be noted and given weight going forward. Paragraph 38 states that: "Within the borough 'countryside' falls into 2 parts; Green Belt land to the west of Doncaster and 'Countryside Policy Protection Area' to the east of Doncaster. I was informed at the Hearings that there is no other 'countryside' which falls outside of these 2 designations. The use of the term 'Countryside Policy Protection Area' is misleading. The area so designated has not been assessed for its special qualities and there is no policy either in the Core Strategy or the DPD which gives it any special status. The land is simply countryside. Referring to it as anything else implies a status which it does not possess". It goes on to identify that "in the Council’s 'strategic sieve', countryside does not carry the same weight as Green Belt. This is proper in my view. However, it does carry the same weight as a Flood Zone 2 designation".

Response:

Noted.
Overall we consider that the draft allocation of Site 001 has a range of significant technical and environmental concerns. The proposed allocation of this site is unsound as it is 'unjustified' and is considered to be an inappropriate option when considered against other reasonable and more sustainable alternatives (Site 160, Bradholme Farm) which aligns with draft Policies 1, 2 and 3, as demonstrated below. It is also unsound as it is not consistent with national policy contained within the NPPF which seeks plans to "be prepared with the objective of contributing to the achievement of sustainable development" and positively prepared, "in a way that is aspirational but deliverable".

**Summary:**
Site 001 has a range of significant technical and environmental concerns. This allocation is unsound as it is 'unjustified' and is inappropriate option when considered against other reasonable and more sustainable alternatives (Site 160) which aligns with draft Policies 1, 2, and 3. It is also unsound as it is not consistent with national policy

**Response:**
Noted. The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions.
An Accessibility Review has been prepared by Development Planning Limited (DPL) in support of these representations and is contained within Appendix 4. It should be read alongside the comments set out below. The Sustainability Appraisal of the Doncaster Local Plan 2015 - 2035: Publication Version identifies a neutral effect for criterion 3A ii) (accessibility to public transport - train) for Site 001, Thorne North. However, the DPL review has identified that the walking route to Thorne's railway stations is via a substandard footway which cannot accommodate pedestrians and has no provision for people with a disability. The nearest railway station, Thorne North at 1.2km south east of the site is unlikely to be attractive to users, not least because Site 001 is wholly separated from the town and Thorne North station by the M18 motorway. It is therefore considered that this criterion should be identified as negative in any site selection assessment. In relation to criterion 3Aiii) the Sustainability Appraisal states that the site will promote cycling as it is within 100m of an identified cycle network however the Accessibility Review included within Appendix 4 provides information contrary to this identifying that cycle users will have to negotiate 40mph traffic-dominated Selby Road, to the high speed motorway interchange and along the unlit high speed, heavy vehicle carrying route along Selby Road to site. We therefore question the validity of this claim and accessibility of Site 001, Thorne North via bike. It is therefore considered that the Site 001 assessment should be negative in this respect. The NPPF clearly promotes sustainable development. With regards to transport paragraph 103 acknowledges that "opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making". Paragraph 108 goes on to state that "in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that opportunities to promote sustainable transport modes can be - or have been - taken up, given the type of development and its location". Overall it is considered that Site 001, Thorne North is not within an accessible location and therefore, in line with the NPPF, it is not considered to be sustainable in terms of accessibility and connectivity. This review highlights flaws within the Sustainability Appraisal of Doncaster Local Plan Publication Version (August 2019) and the methodology used to select sites. (SEE SERVER FOR Appendices)

Summary:
An Accessibility Review has been prepared by Development Planning Ltd (DLP) (Appendix 4). Site 001 - the Sustainability Appraisal for the Plan identifies a neutral effect for criterion 3A ii) (accessibility to public transport - train). However the DLP report identifies that the walking route to Thorne's railway station is via a substandard footway. The nearest railway station (Thorne North) is unlikely to be attractive to users - site 001 is wholly separated from Thorne and the station by the motorway. This criterion should be identified as negative. Criterion 3A iii) states that the site will promote cycling as it is within 100m of an identified cycle network. However, the DLP report identifies that cycle users will have to negotiate the 40 mph traffic dominated Selby Road to the high speed motorway interchange and then along the unlit high speed, heavy vehicle carrying route along Selby Road to the site. The validity of the claim and the accessibility of Site 001, via bike is questioned. This criterion should be identified as negative. The NPPF clearly promotes sustainable development and overall it is considered that Site 001 is not within an accessible location and therefore in line with national guidance, it is not considered to be sustainable in terms of accessibility and connectivity.

Response:
Noted. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites.
We note that the outline application for proposed employment development at Thorne North (Ref. 16/02136/OUTM) has been pending determination since 2016. A review of the application has identified that there are a significant number of objections from statutory consultees and also requests for additional information. These are identified below: Objections from technical and Statutory Consultees: - Regeneration and Environment - Air Quality - Built and Natural Environment Team (Ecology) - CPRE (Campaign to Protect Rural England South Yorkshire) - Highways England - Yorkshire Wildlife Trust The latest correspondence from Highways England dated 22nd August 2019 gives notice that they recommend that planning permission not be granted for a further 6 months in order for any outstanding issues to be resolved and that they content that there are appropriate solutions in place to ensure the continued safe and efficient operation of the SRN. Additional work has also been requested by: - Network Rail - South Yorkshire Archaeology Service - Shire Group of IDBs - Barn Owl Trust - Environment Agency - Natural England - Planning Policy - Highways Development & Control Given that a large majority of these objections and requests for additional information have been outstanding for a significant length of time (some since 2016) with very little, if any, additional information being submitted to resolve them we question the ability of the applicant to resolve the identified issues/outstanding information and therefore the deliverability of the site. When allocating sites Council's should be mindful that plans should be "prepared positively, in a way that is aspirational but deliverable" as set out in paragraph 16 of the NPPF. There is also an objection from the Town Council as this application was considered at its meeting on 8th November 2016 and the following comments were made: 1. There were concern (sic) about the location of the access roundabout on Selby Road, and its relationship with the nearby road towards Fishlake. 2. The Council consider that a secondary access is needed for a development of this scale. 3. The Council would wish to be satisfied that the mitigation measures to deal with flooding and drainage issues that will be required in a detailed application adequately deal with the potential problems. 4. The impact of the development and proposed accesses onto North Common Road is not adequately addressed. North Common Road and its access with Selby Road would need improving should this proposal go ahead. 5. The proposals for connectivity between this site and Thorne and Moorends are poor as there would not be safe pedestrian and cycle routes created. Aside from these specific points, some of which we consider are not able to be resolved, we would also question the robustness of key parts of the application supporting information as either being wholly flawed or With regards to deliverability we also note that the application ref: 16/02136/OUTM is being promoted by the landowner and that there is no clear indication of a developer. We therefore question whether the site and the proposed scheme is deliverable if it has not been tested by a developer with a known track record of delivery.

Response:
As with any applications, any technical issues will resolved at the planning application stage. Planning Application ref 16/02136/OUTM is currently 'pending decision’. As at November 2019 a major developer is involved in and is promoting the site. The evidence base supporting the application is being updated.
A review of the ecological information contained within the Environmental Statement and standalone documents for planning application ref. 16/02136/OUTM at Thorne North undertaken by AES-LTD dated 23 August 2019 has identified that the surveys submitted as part of the application are now out of date and that there are survey elements missing. A copy of the note is attached in Appendix 5. In summary, there are the following deficiencies with the application from an ecological perspective: Bats: Bat surveys are out of date with roost surveys being undertaken in June 2015 and activity surveys being undertaken in May, July and September 2016. Tree Climbing surveys were undertaken in August 2016. Activity surveys have not been undertaken in line with standard methodology or current guidelines (Collins, 2016). The site has been assessed by the consultant as being of low habitat suitability, however x6 transect surveys per survey occasion were completed. Note no static (automated) detectors were deployed. For low suitability habitat the guidelines state that x1 detector should be deployed for x5 consecutive nights per transect. Water Vole: The single survey visit was reported as being undertaken in 2016, but no date is given for the survey visit. The visit is out of date and inadequate. The survey has not been undertaken using current guidance (Dean et al. 2016). Amphibians: Both presence / absence surveys (2015) and eDNA surveys (ponds only, 2016) are out of date and will need to be repeated to identify if great crested newt are present within and around the site. Breeding Bird Survey: Survey has been reported from just one survey occasion (24th June 2016). The breeding status of birds or their territories cannot be adequately assessed or mapped from a single visit. The surveys have not been undertaken using standard methodology or current guidelines and is out of date. Winter Bird Survey: No survey undertaken for winter birds. Reptile Survey: No survey undertaken for reptiles; there are records for reptiles - both grass snake and common lizard within 1km of the site however, no surveys have been undertaken to confirm their presence or likely absence despite there being suitable habitat present on site (semi-improved rough grassland field margins, dykes with southern facing banks, scrub, small groups of trees, hedgerows. The surveys as reported are incomplete and now out of date; they have not been undertaken in line with standard methods and current guidance. All protected / notable species and habitat surveys will need to be updated and extended to reflect the current situation on site. The Ecological Appraisal (Smeedon Forman Limited, 2016) does not adequately assess the impacts on protected / notable and priority species. There are also objections to the application from the Built and Natural Environment Team in relation to Ecology and also the Yorkshire Wildlife Trust. Given that there are significant ecological flaws within the planning application and accompanying Environmental Statement it is concerning that the applicant has made no attempt to address these deficiencies, especially given the length of time the application has been pending determination. This shows a lack of commitment to the proposal and, along with wider technical and environmental concerns, brings doubts in relation to the potential to actually develop the site. (SEE SERVER FOR Appendices)

Summary:
The surveys submitted as part of the Thorne North application are put of date and there are survey elements missing. The application has the following ecological deficiencies: Bats ? the surveys are out of date (undertaken in 2015 and 2016 and not undertaken correctly. Water Vole ? the single survey visit was undertaken in 2016, but no date is given for the survey visit. Survey is out of date and inadequate. Amphibians ? surveys are out of date and need to be repeated to identify if great crested newts are present within and around the site. Breeding Bird Survey ? only one survey occasion in June 2016 so it is out of date. It was not undertaken using standard methodology or current guidelines. Winter Bird Survey ? no survey undertaken. Reptile Survey ? no survey undertaken even though there are grass snakes and common lizards within 1km of the site. In summary, the surveys are incomplete and out of date. They not been undertaken in line with standard methods and current guidance. They need to be updated and extended to reflect the current situation on site. The Ecological Appraisal (2016) does not adequately assess the impacts on protected / notable and priority species. There are objections to the application from the Built and Natural Environment Team in relation to Ecology and also the Yorkshire Wildlife Trust. It is concerning that the applicant has made no attempt to address these deficiencies, especially given the length of time the application has been pending determination. This shows a lack of commitment to the proposal and, along with wider technical and environmental concerns, brings doubts in relation to the potential to actually develop the site.

Response:
As with any application, any technical issues will resolved at the Planning application stage. Planning Application ref 16/02136/OUTM is currently ‘pending decision’. As at November 2019 a major developer is involved in and is promoting the site. The evidence base supporting the application has been updated.
A review of planning application ref. 16/02136/OUTM by BWB Consulting Ltd on behalf of Harworth has identified a number of issues in relation to flood risk. A copy of the Flood Risk Technical Note prepared by BWB Consulting dated September 2019 is included within Appendix 6 and should be read alongside this representation. Thorne North is located in Environment Agency (EA) Flood Zone 3 (High Probability), defined as land having a 1 in 100 or greater annual probability of river flooding (>1% Annual Event Probability); or land having a 1 in 200 or greater annual probability of flooding from the sea (>0.5% AEP). This is represented by "Flood Zone 3" on the Flood Map for Planning and not distinguished from Flood Zone 3b (The Functional Floodplain) which is defined as land where water has to flow or be stored in times of flood. Of note is the fact that the flood risk to Thorne North is likely to be a combination of fluvial (river) and tidal risk because of the effects of the River Trent within the vicinity. However there is an apparent lack of assessment of the impact of failure of pumping stations trapping surface water behind defences which is likely to be a significant contributing factor at this location, exacerbated by its relative low lying topography. The Flood Map for Planning does not take into account the presence of flood defences, which provide the site with a degree of protection (i.e. it is within the defended floodplain). The nearest Main River is the River Don to the west. Cooper Consulting Engineers (CCE) produced a Flood Risk Assessment (FRA) to support the current planning application (Ref: 16/02136/OUTM0) in July 2015 which discusses the standard of defence provided to the site based on EA data and a topographical survey. Crest levels of relevant defences are believed to offer a standard of protection against a 1:200 (0.5% AEP) year flood albeit the EA's stated design standard is 1:75 (1.3% AEP). The site is recognised to have flooded historically as recently as 2007 but no information has been provided to explain the mechanism behind this (i.e. overtopping, breach, pumping station failure etc) which would be expected in any FRA. Although the flood defences offer a level of protection, there remains a risk to the site from a breach event, and this is an appropriate consideration in respect of finished levels, access and egress. The EA is generally keen to stress that flood defences are provided to reduce risk, not to facilitate development. The site is noted to experience flood depths (in a 1:100 breach event) of up to 1.0m, which equates to 4.0m AOD. Flood levels could be higher when the effects of recent climate change allowances are taken into account (which they are not), and where a conservative approach may have been taken (such as using the 1:1,000 flood event), this has not been made. EA advice within the Isle of Axholme is that floor levels, in the absence of further evidence, should be set at 4.1m AOD plus an allowance of 300mm for freeboard, i.e. 4.4m AOD and this is proposed within the FRA. Agreement with local stakeholders as to the FFL of 4.4m AOD has been reached. However, given the apparent risk it would not be appropriate to set the levels any lower and still maintain a compliant approach. The requirement to raise the site to achieve 4.4m AOD necessitates an increase in ground level, particularly under buildings, where the difference from existing ground level to proposed level is 1.2 - 2.0m across the site. A topographical survey was not available so LiDAR data was obtained from the EA and used to create a ground model of the existing site. In order to provide further context as to the deliverability of the site, a ground model was created of finished material which would approximate volumes of material could be understood. This was based on the following assumptions; - FFL of 4.4m AOD - External areas set at an average FFL of 1.2m (to accommodate loading docks and minimise requirements to import fill) - Access road at 2.9m AOD - Average construction depths of 300mm - Average topsoil depth of 300mm - All excavated material (except topsoil) is suitable for reuse as a geotechnically suitable fill. The table below summarises the outputs of the modelling that has been undertaken Action: Bulk Cut/Fill Cut (m3): 50,000 Fill (m3): 624,800 Comment: Bulky cut/fill to achieve formation level from existing levels following topsoil removal Action: Fill arising from construction of foundations and drainage Cut (m3): 73,700 Fill (m3): - Net (m3): 501,100 Comment: Based on typical rate of 0.15m3/m2 Based on the assumptions noted, there is a requirement to import over half a million cubic metres of fill material in order to achieve the finished formation level. This requirement has not been considered within the currently pending planning application ref.16/02136/OUTM which throws into doubt the deliverability of the proposal and the site. In particular, the net import of 500,000m3 of fill material could represent: - a total of up to 1m tonnes of material - 50,000 HGV loads (20 tonne wagon) - 100,000 total HGV movements

Summary:
Flood risk - BWB Consulting has identified a number of issues. A Technical Note has been prepared. Thorne North is located in EA Flood Zone 3. The flood risk to Thorne North is likely to be a combination of fluvial (river) and tidal risk because of the effects of the River Trent within the vicinity. There is a lack of assessment of the impact of failure of pumping stations trapping surface water behind defences which is likely to be a significant contributing factor at this location, exacerbated by its relative low lying topography. The Flood Map for Planning does not take into account the presence of flood defences, which provide the site with a degree of protection. The nearest Main River is the River Don to the west. Cooper Consulting Engineers (CCE) produced a Flood Risk Assessment (FRA) to support the current planning application. The site is recognised to have flooded historically as recently as 2007 but no information has been provided to explain the mechanism behind this (i.e. overtopping, breach, pumping station failure etc) which would be expected in any FRA. Although flood defences offer a level of protection, there is a risk to the site from a breach event, and this is an appropriate consideration in respect of finished levels, access and egress. The EA is generally keen to stress that flood defences are provided to reduce risk, not to facilitate development. The site is noted to experience flood depths (in a 1:100...
breach event) of up to 1.0m, which equates to 4.0m AOD. Flood levels could be higher when the effects of recent climate change allowances are taken into account (which they are not), and where a conservative approach may have been taken (such as using the 1:1,000 flood event), this has not been made. EA advice within the Isle of Axholme is that floor levels, in the absence of further evidence, should be set at 4.1m AOD plus an allowance of 300mm for freeboard, i.e. 4.4m AOD and this is proposed within the FRA. Agreement with local stakeholders as to the FFL of 4.4m AOD has been reached. However, given the apparent risk it would not be appropriate to set the levels any lower and still maintain a compliant approach. The requirement to raise the site to achieve 4.4m AOD necessitates an increase in ground level, particularly under buildings, where the difference from existing ground level to proposed level is 1.2 - 2.0m across the site. A topographical survey was not available so LiDAR data was obtained from the EA and used to create a ground model of the existing site. In order to provide further context as to the deliverability of the site, a ground model was created of finished levels so that approximate volumes of material could be understood. This was based on the following assumptions; - FFL of 4.4m AOD - External areas set at an average FFL of 1.2m (to accommodate loading docks and minimise requirements to import fill) - Access road at 2.9m AOD - Average construction depths of 300mm - Average topsoil depth of 300mm - All excavated material (except topsoil) is suitable for reuse as a geotechnically suitable fill. The table below summarises the outputs of the modelling that has been undertaken. Action: Bulk Cut/Fill Cut (m3): 50,000 Fill (m3): 624,800 Net (m3): 574,800 Comment: Bulk cut/fill to achieve formation level from existing levels following to topsoil removal. Action: Fill arising from construction of foundations and drainage Cut (m3): 73,700 Fill (m3): - Net (m3): 501,100 Comment: Based on typical rate of 0.15m3/m2. Based on the assumptions noted, there is a requirement to import over half a million cubic metres of fill material in order to achieve the finished formation level. This requirement has not been considered within the currently pending planning application ref.16/02136/OUTM which throws into doubt the deliverability of the proposal and the site. In particular, the net import of 500,000m3 of fill material could represent: - a total of up to 1m tonnes of material - 50,000 HGV loads (20 tonne wagon) - 100,000 total HGV movements. It is anticipated that development of Site 001 would be very much phased it is obvious that the scale of fill material to be imported, the associated groundworks and the off-site haulage operations would have a very significant impact in themselves and over significant period of time.

Response:
Site is flood zone 3 (High Risk) and ‘benefits from flood defences’ (EA data). For potential development in flood risk areas see Policy 58 ‘Flood Risk Management’. All technical issues including flood risk will be resolved at the planning application stage. As at November 2019 Site 001 has major developer support and the evidence base for the planning application has been updated.
We note that the latest correspondence from Highways England dated 22 August 2019 in relation to the currently pending application (ref: 16/02136/OUTM) at Thorne North recommends that planning permission is not granted for a further 6 months in order for outstanding issues in relation to the Strategic Road Network to be resolved. This follows numerous earlier requests for additional information in relation to the impact on the Strategic Road Network. We understand that Highways England have proposed that trigger points are used to determine when highway interventions are delivered, however to date this information remains outstanding. This information has been outstanding for a significant period of time now and every 6 month Highways England have refreshed their request for the application to not be granted. It appears from a review of public access and also through discussions with Highways England that no progress has been made in resolving this request. We therefore question the deliverability of the proposals from a highways perspective given the length of time that the application has had to resolve this matter.

Summary:
The deliverability of the proposals from a highways perspective is questioned. This is because Highways England have recommended that planning permission is not granted for a further 6 months for outstanding issues to be resolved. This follows numerous other requests for additional information. The information requested from Highways England has been outstanding for a significant period of time.

Response:
Highways England are working with the Council and the applicant to address the issues raised.
Appendix 1 Housing and Employment Sites Detail that there was some local support for Site 001 was selected for the following reasons:

Carter Jonas
Policy 4: Employment Allocations
Chapter 4: Strategic Approach

The Doncaster Local Plan Housing and Employment Site Selection Methodology and Results Report Publication Version (June 2019) and the Sustainability Appraisal of the Doncaster Local Plan 2015 - 2035: Publication Version identify that Site 001 was selected for the following reasons: "As with all the potential sites in the M18 Corridor, this site fails the flood risk sequential test as it is within Flood Zone 3. It also scores similarly to the other sites through the Sustainability Appraisal process. It is currently designated as Countryside Policy Area by the UDP Proposals Map. Core Strategy Policy CS3: Countryside also applies as it continues to protect the countryside to the east of the borough through Countryside Protection Policy Area. It provides an excellent job creation opportunity in the north of the borough and it will complement the successful existing industrial estates to the north of Thorne. There is an outline planning application pending for employment uses. The site has support through the Informal Consultation on the Local Plan which took place in September - October 2018 (see Draft Policies and Proposed Sites Consultation Summary for further information). The Doncaster Employment Land Review suggests that if allocated 50% of the site could be developed in the plan period (36.8ha). Due to the extension of the plan period this would now equate to 70% of the site could be developed in the plan period. The majority of development could be for B8 and some for B2 (85/25% split)". It is clear from the above that there is no substantive planning and environmental evidence available to support the rationale for the selection of Site 001 as an allocation. This is a fundamental shift from the Council’s previous position at the informal consultation stage in September 2018 of the Draft Policies and Proposed Sites where Site 001 was not selected for allocation for the following reasons: "As with all the potential sites in the M18 Corridor, this site fails the flood risk sequential test as it is within Flood Zone 3. It also scores similar to the other sites through the Sustainability Appraisal process. It is currently within Countryside Policy Area as designated by the UDP. Although there are successful existing industrial estates to the north of Thorne which this site could complement and there is an outline planning application pending, there are concerns over the site’s deliverability as there are more deliverable sites elsewhere. The Doncaster Employment Land Review suggests that if allocated 50% of the site could be developed in the plan period (36.8ha). The majority of development could be for B8 and some for B2 (85/25% split). The allocation of this site would exceed the supply of employment land". While Thorne Moors Town Council are now supporting Site 001 they have in the recent past expressed their own concerns with regard to the accessibility and connectivity of this site. It is clear that the many planning, sustainability, delivery and technical issues surrounding the proposed development of this site have not been properly assessed/considered. There has been no further evidence provided as to why the site is now considered a more deliverable site than Site 160, which was the draft allocation in September 2018. We note however from the Local Plan 2018 Draft Policies and Proposed Sites Consultation Summary - Appendix 1 Housing and Employment Sites Detail that there was some local support for Site 001 and it appears to be for this reason alone that the land has been selected for allocation above other more deliverable sites. Whilst there is some local support for the allocation of Site 001, we are concerned that the sustainability and technical issues of this site in comparison to other sites such as Site 160, Bradholme Farm have not been properly assessed/considered during the preparation of the Publication Draft Local Plan. As a result we consider that a significantly less deliverable and less sustainable site has been selected as a draft allocation. The challenges to the deliverability of Thorne North are further evidenced by the ongoing consideration of a planning application, which was submitted in August 2016 (ref.16/02136/OUTM) and is still pending determination, largely due to unresolved technical issues. This application has received a significant number of objections from technical and statutory consultees, along with requests for additional information which are detailed below. To date these have not been resolved. It is evident that there are serious questions over the technical and environmental material considerations as well as overall site deliverability.

Summary:
The Council’s explanation of the reasoning behind the allocation Site 001 (as stated in the Site Selection and Methodology and Results Report) gives no substantial planning and environmental evidence to support the rationale. It is a fundamental shift from the Council’s previous position at the informal consultation stage where Site 001 was not selected for allocation. Although Thorne-Moorends Town Council are now supporting Site 001, they have previously expressed concerns with accessibility and connectivity of the site. It is clear that many planning, sustainability, delivery and technical issues surrounding Site 001 have not been properly assessed/considered. There has been no further evidence proposed as to why the site is now considered a more deliverable site than Site 160. We note that there is some local support for Site 001 and it appears that for this reason alone that the site has been selected for allocation. Whilst there is some local support for the allocation of site 001, there are concerns that the sustainability and technical issues of the site, in comparison to other sites such as 160, have not been properly assessed/considered during the preparation of the Publication version of the Local Plan. It is considered that a significantly less deliverable and less sustainable site has been selected as a draft allocation. The challenges of deliverability of Thorne North are further evidenced by the ongoing consideration of a planning application. This was submitted in August 2016 and is still pending determination. It has received significant objections and has unresolved issues.
The sustainability appraisal (SA) for sites in the M18 corridor (those without planning permission) showed little evidence to support one site over another in terms of SA (see evidence base for SA data). The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood and has used a consistent approach for all sites. Site 160 was originally proposed for allocation in the 2018 consultation. Based on responses to that consultation Site 160 was removed and Site 001 subsequently proposed for allocation. The 2016 planning application is currently pending decision. As at November 2019 a major developer is now promoting the site and the technical evidence base in support of the application has been updated.

Response:

CusRef: 05197  Name: Peacock And Smith
Date: 30/09/2019  Organisation: Peacock and Smith
Representing: Blue Anchor Leisure Limited

Comment Ref: /Policy 4:Site 001: Intro/05197/1/021
Attend Examination: Attend Hearing
Reason: We have compiled a detailed submission which is underpinned by a number of technical and evidence-based studies. We consider that it will be necessary to discuss this evidence with Officers and the Inspector at the Examination.
Area: Chapter 4: Strategic Approach
Policy: Policy 4: Employment Allocations

Tests of Soundness:
- Positively prepared
- Justified
- Effective
- Consistent with national

Comment:

1.1 Blue Anchor Leisure objects to the proposed allocation of Site 001 for employment. 1.2 It is considered that there are doubts about the deliverability of Site 001 for employment within the plan period; allocation of the site fails the sequential approach; and we also have concerns about the Sustainability Appraisal (SA) scores set out in the Council’s Site Selection Report. 1.3 In this objection we refer to a number of other documents. These include the attached Accessibility Technical Note by Sanderson Associates (Appendix 1); the attached Flood Risk report by Fairhurst (Appendix 2); and the attached Commercial Review Report by Dove Haigh Phillips (Appendix 3). 1.4 This representation should be read in conjunction with our client’s associated objections to Policies 3 and 4, and the Site Selection process of the Local Plan. (SEE SUPPORTING DOCS for Appendices)

Summary:

Object to the proposed allocation of Site 001. There are doubts about the deliverability of the site for employment within the plan period; the allocation fails the sequential approach; and there are concerns about the Sustainability Appraisal (SA) scores as set out in the Site Selection Report.

Response:

Noted. The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites.
### Comment Ref:
/Policy 4:Site 001:Change/05197/1/025

### Attend Examination:
Attend Hearing

### Reason:
We have compiled a detailed submission which is underpinned by a number of technical and evidence-based studies. We consider that it will be necessary to discuss this evidence with Officers and the Inspector at the Examination.

### Area:
Chapter 4: Strategic Approach

### Policy:
Policy 4: Employment Allocations

### Tests of Soundness:
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### Comment:
5.1 Site 001 should be deleted as an employment allocation and replaced by the site option at West Moor Park East (Site 937/1031/938/1014). West Moor Park East is more deliverable, sequentially preferable in respect of flood risk and it performs better than Site 001 in respect of SA.

### Summary:
Site 001 should be deleted as an employment allocation and replaced by West Moor Park East (Site 937/1031/938/1014). West Moor Park East is more deliverable, sequentially preferable in respect of flood risk and it performs better than Site 001 in respect of SA.

### Response:
The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions.
We have compiled a detailed submission which is underpinned by a number of technical and evidence-based studies. We consider that it will be necessary to discuss this evidence with Officers and the Inspector at the Examination.

### Tests of Soundness

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Policy 4 - Site 001 - Doubts about the Deliverability of Site 001 Within the Plan Period

2.1 Site 001 was rejected as an allocation during the October 2018 Local Plan consultation. The Council’s stated reasons for rejection of the site within the September 2018 Site Selection Methodology and Results Report provided at that stage were as follows: “Although there are successful existing industrial estates to the north of Thorne which this site could complement, and there is an outline planning application pending, there are concerns over the site’s deliverability as there are more deliverable sites elsewhere.” (our emphasis) 2.2 The Site Selection Report for the Publication Draft Local Plan does not provide any new information to demonstrate why the previous concerns about the deliverability of Site 001 have now been overcome. Whilst a planning application has been submitted for the site, this was lodged some 2 years ago and is still pending - which suggests that there are some issues regarding the suitability of the site for employment that still need to be resolved. 2.3 The attached report by Dove Haigh Phillips (Appendix 3) comments that Thorne is not an established hub for warehousing development and existing employment development has taken place over a much long period of time than the pace achieved at iPort and West Moor Park. 2.4 Dove Haigh Phillips also note that Site 001 is not well related to the main urban area of Doncaster (as recognised by the Colliers Employment Land Review 2018) and there is a limited catchment population to provide a local labour force to support a large scale development at Thorne North. This is demonstrated in the extract from the Sanderson Associates report (Appendix 1), which shows that within a 5mile/8km travel distance from Thorne North there would be approximately a third of the population that would be available within the same distance from rejected site option West Moor Park East (Site 937/1031/938/1014). Population within 8km Travel Distance Site Ref: 937 Location: West Moor Park East Existing Population: 77,500 Existing Households: 33,500 Proposed Population: 9,405 Proposed Households: 4,089 Total Population: 86,905 Total Households: 37,589 Site Ref: 001 Location: Thorne North Existing Population: 29,000 Existing Households: 12,200 Proposed Population: 2,493 Proposed Households: 1,084 Total Population: 31,493 Total Households: 13,284 Site Ref: 441 Location: Carcroft Existing Population: 83,000 Existing Households: 36,200 Proposed Population: 7,390 Proposed Households: 3,213 Total Population: 90,390 Total Households: 39,413 Site Ref: 878/1032 Location: Rossington Existing Population: 70,300 Existing Households: 30,800 Proposed Population: 14,472 Proposed Households: 6,292 Total Population: 84,772 Total Households: 37,092 Site Ref: 941 Location: Poplar Farm Existing Population: 55,200 Existing Households: 23,900 Proposed Population: 14,472 Proposed Households: 5,335 Total Population: 67,471 Total Households: 29,235 2.5 In light of the above, Dove Haigh Phillips consider that it is more likely that the site would deliver 36.8 hectares, as estimated by the Colliers Employment Land Review 2018 (and also confirmed in the subsequent amendments to the Colliers Employment Land Review, made as recently as June 2019). We also note that the Site Selection Report reasons project this lower employment contribution to the Local Plan, 36.8 hectares, than is assumed by the actual figure stated within the Site Selection table, 51.54 hectares. This indicates that there is a 14.74 hectares shortfall in the likely delivery from Site 001. 2.16 In summary, the Council’s previous assessment of Site 001 at the October 2018 Local Plan consultation stage indicates that there are delivery concerns about this option, and no new evidence has been provided at Publication stage to justify its change in status from a rejected allocation to a draft allocation. 2.17 At best, we agree with the conclusion of Colliers and the Site Selection Report that Site 001 would be only likely to deliver up to 36.8 hectares of land over the plan period. This leaves a 14.74 hectare shortfall in the Council’s assumed delivery from this site. (SEE SUPPORTING DOCS for Appendices)

### Summary

Policy 4 - Site 001 - Doubts about the Deliverability of Site 001 Within the Plan Period

Site 001 was rejected as an allocation during October 2018. The Council’s reasons were: “Although there are successful existing industrial estates to the north of Thorne which this site could complement, and there is an outline planning application pending, there are concerns over the site’s deliverability as there are more deliverable sites elsewhere.” The Site Selection Report for the Publication version does not provide any new information to demonstrate why these concerns have been overcome. The planning application was submitted 2 years ago and is still pending. Thorne is not an established hub for warehousing. Site 001 is not well related to the main urban area of Doncaster and there is a limited labour force catchment. Within a 5mile/8km travel distance from Thorne North there is approximately a third of the population that would be available within the same distance from rejected site option West Moor Park East (Site 937/1031/938/1014). Population within 8km travel distance Site Ref: 937 Location: West Moor Park East Existing Population: 77,500 Existing Households: 33,500 Proposed Population: 9,405 Proposed Households: 4,089 Total Population: 86,905 Total Households: 37,589 Site Ref: 001 Location: Thorne North Existing Population: 29,000 Existing Households: 12,200 Proposed Population: 2,493 Proposed Households: 1,084 Total Population: 31,493 Total Households: 13,284 Site Ref: 441 Location: Carcroft Existing Population: 83,000 Existing Households: 36,200 Proposed Population: 7,390 Proposed Households: 3,213 Total Population: 90,390 Total Households: 39,413 Site Ref: 878/1032 Location: Rossington Existing Population: 70,300 Existing Households: 30,800 Proposed Population: 14,472 Proposed Households: 6,292 Total Population: 84,772 Total Households: 37,092 Site Ref: 941 Location: Poplar Farm Existing Population: 55,200 Existing Households: 23,900 Proposed Population: 14,472 Proposed Households: 5,335 Total Population: 67,471 Total Households: 29,235 It is questioned whether Site 001 could deliver the amount of land anticipated by the Local Plan - 51.54 ha. It is more likely to deliver 36.8 ha (as estimated by Colliers). The Site Selection Report reasons project this lower employment contribution to the local plan, 36.8 hectares, than is assumed by the actual
figure stated within the Site Selection table, 51.54 hectares. This indicates that there is a 14.74 hectares shortfall in the likely delivery from Site 001. In summary the Council’s previous assessment of Site 001 at the Informal consultation stage indicates there are delivery concerns about this site option. No new evidence has been provided to justify its change in status from a rejected to draft allocation. Agree with the conclusion of Colliers and the Site Selection Report that Site 001 would be only likely to deliver up to 36.8 hectares of land over the plan period. This leaves a 14.74 ha in the Council’s assumed delivery from this site.

Response:

The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites.

CUSREF: 05197 Name: Peacock And Smith
Date: 30/09/2019 Organisation: Peacock and Smith
Representing: Blue Anchor Leisure Limited

Comment Ref: /Policy 4:Site 001:Flood/05197/1/023
Attend Examination: Attend Hearing
Reason: We have compiled a detailed submission which is underpinned by a number of technical and evidence-based studies. We consider that it will be necessary to discuss this evidence with Officers and the Inspector at the Examination.
Area: Chapter 4: Strategic Approach
Policy: Policy 4: Employment Allocations

Tests of Soundness:

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Comment:

Policy 4 - Site 001- Allocation of Site 001 Does not Comply with Flood Risk Sequential Test 3.1 Para 158 of the NPPF states that development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. This is a fundamental purpose of the sequential test for flooding. Para 159 indicates that the exception test should only be applied if it is not possible for development to be located in zones with a lower risk of flooding (taking into account wider sustainable development objectives). 3.2 As explained in the attached report by Fairhurst (Appendix 2) all of Site 001 is located within FZ3a, in an area of known ponds and ditch drains, including the presence of shallow groundwater and poor surface water drainage. It is therefore necessary to consider whether the site can be accommodated on a suitable site in a lower zone of flood risk. 3.3 Section 4.4 of the Fairhurst report shows that the developable area of West Moor Park East (Site 937/1031/938/1014) in FZ1 is 48.6 hectares. This quantum of land could replace all of the expected Local Plan contribution of Site 001 we refer to within Section 2 of this objection - 36.8 hectares. It could effectively also replace the greater contribution assumed by the Local Plan - 51.54 hectares. Fairhurst therefore conclude that the application of the sequential test would preferentially select West Moor Park East to Site 001. 3.4 As explained in our client’s general comments on Policy 4, there is no evidence to suggest that West Moor Park East is not a suitable site for employment. It is a site that accords with the spatial strategy of the Local Plan and the sequential test requires that it is considered prior to allocation of land in FZ3a. We therefore consider that the Local Plan does not properly apply the sequential test to Site 001. Allocation of this site in the context of the rejection of allocation of West Moor Park East is contrary to national policy. (SEE SUPPORTING DOCS for Appendices)

Summary:

Policy 4 - Site 001- Allocation of Site 001 Does not Comply with Flood Risk Sequential Test

Response:

The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions.
1.1 Blue Anchor Leisure objects to the proposed allocation of Site 441 for employment. 1.2 It is considered that Site 441 is not deliverable for employment within the plan period; allocation of the site fails the sequential approach; and the Sustainability Appraisal (SA) scores set out in the Council’s Site Selection Report are incorrect. 1.3 In this objection we refer to a number of other documents. These include the attached Accessibility Technical Note by Sanderson Associates (Appendix 1); the attached A1M/A19 Technical Note by Sanderson Associates (Appendix 2) and the attached Flood Risk report by Fairhurst (Appendix 3). 1.4 This representation should be read in conjunction with our client’s associated objections to Policies 3 and 4 and the Site Selection process of the Local Plan. (SEE SUPPORTING DOCS for Appendices)

Summary:
Object to the proposed allocation of Site 441 for employment. This site is not deliverable within the plan period; it fails the sequential approach; and the Sustainability Appraisal (SA) scores set out in the Council’s Site Selection Report are incorrect.

Response:
The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites.
We have compiled a detailed submission which is underpinned by a number of technical and evidence-based studies. We consider that it will be necessary to discuss this evidence with Officers and the Inspector at the Examination.

Area: Chapter 4: Strategic Approach
Policy: Policy 4: Employment Allocations

Tests of Soundness: Positively prepared Effective
Justified Consistent with national

Comment:
Policy 4 - Site 441 - Suggested Change 5.1 Site 441 should be deleted as an employment allocation. The primary concern is that the site is not deliverable due to the high level of uncertainty associated with delivery of the A1M/A19 link. 5.2 In addition, the Local Plan does not properly apply the sequential test to Site 441. Allocation of this site in the context of the rejection of allocation of West Moor Park East is contrary to national policy.

Summary:
Policy 4 - Site 441 - Suggested Change Site 441 should be deleted as an employment allocation. The site is not deliverable due to the high level of uncertainty associated with delivery of the A1M/A19 link and the Local Plan does not properly apply the sequential test to Site 441. Allocation of this site in the context of the rejection of allocation of West Moor Park East is contrary to national policy.

Response:
The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions.
Policy 4 - Site 441 is not Deliverable Within the Plan Period 2.1 All of Site 441 was identified as land to be safeguarded for employment use in the adopted UDP, but it has not been developed for new employment uses despite the passage of 21 years, which indicates that there are some significant constraints to its development. Para 4.22 of the UDP acknowledges that the site has significant issues, particularly in relation to access and drainage. The Local Plan and evidence base does not provide evidence that these constraints have been overcome. 2.2 In relation to access, Paras 4.31/4.58 of the Local Plan and the Site Selection Report indicate that development of Site 441 is dependent on construction of a new A1M to A19 link road. However, whilst there is reference to this road in Policy 13 of the plan, it is no more than an aspiration. The attached Technical Note by Sanderson Associates (Appendix 2) indicates that: - There is no information available about the precise route of the link road. It is simply an indicative line; - The Southern Pennines Strategic Development Corridor - Strategic Outline Case (SOC) March 2019 explains that the link road is at a very early stage of assessment, with no positive funding available. The SOC states that delivery of this transport intervention "should not be relied upon for planning and development purposes "; - Whether any road is ever built and if so the timescale for the delivery of it is a significant unknown. There will be a need for decisions to be taken about priorities and funding, other schemes will be competing for funding, and even when high level decisions are taken, they are susceptible to being reviewed; and - Beyond this there will be a need for technical work and compulsory purchase of land. This is likely to take implementation beyond the Local Plan period, if the link road happens at all. 2.3 In the absence of certainty about the delivery of the A1M to A19 link road there is no certainty about the delivery of Site 441. It is not a justified or effective allocation. (SEE SUPPORTING DOCS for Appendices)

Summary:
Policy 4 - Site 441 is not Deliverable Within the Plan Period Site 441 was identified as a reserve site UDP and has not been developed which indicates that there are some significant constraints. The UDP acknowledges that the site has significant issues, particularly in relation to access and drainage. The Local Plan and evidence base does not provide evidence that these constraints have been overcome. Paras 4.31/4.58 of the Local Plan and the Site Selection Report say that development of Site 441 is dependent on construction of a new A1M to A19 link road this is no more than an aspiration (Policy 13). The Technical Note by Sanderson Associates (Appendix 2) indicates that: - There is no information available about the precise route of the link road. It is simply an indicative line; - The Southern Pennines Strategic Development Corridor - Strategic Outline Case (SOC) March 2019 explains that the link road is at a very early stage of assessment, with no positive funding available; - Whether any road is ever built and if so the timescale for the delivery of it is a significant unknown. There will be a need for decisions to be taken about priorities and funding, other schemes will be competing for funding, and even when high level decisions are taken, they are susceptible to being reviewed; and - Beyond this there will be a need for technical work and compulsory purchase of land. This is likely to take implementation beyond the Local Plan period, if the link road happens at all. In the absence of certainty about the delivery of the A1M to A19 link road there is no certainty about the delivery of Site 441. It is not a justified or effective allocation.

Response:
The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions.
Policy 4 - Site 441 - Allocation of Site 441 Does not Comply with Flood Risk Sequential Test

3.1 Para 158 of the NPPF states that development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. This is a fundamental purpose of the sequential test for flooding. Para 159 indicates that the exception test should only be applied if it is not possible for development to be located in zones with a lower risk of flooding (taking into account wider sustainable development objectives). 3.2 As explained in the attached report by Fairhurst (Appendix 3) all of Site 441 is located within FZ3a, in an area of known ponds and ditch drains, including the presence of shallow groundwater and poor surface water drainage. It is therefore necessary to consider whether the development proposed can be accommodated on a suitable site in a lower zone of flood risk. 3.3 Section 4.4 of the Fairhurst Report shows that the developable area of West Moor Park East (Site 937/1031/938/1014) in FZ1 is 48.6 hectares. This quantum of land could replace all of the Council’s expected Local plan contribution of Site 441 (12.32 hectares) that is located in FZ3a, and twice the total area of the site available for employment use. Fairhurst therefore conclude that the objectives of the sequential test would preferentially select West Moor Park East to Site 441. 3.4 As explained in our client’s general comments on Policy 4, there is no evidence to suggest that West Moor Park East is not a suitable site for employment. It is a site that accords with the spatial strategy of the Local Plan and the sequential test requires that site is considered prior to allocation of land in FZ3a. We therefore consider that the Local Plan does not properly apply the sequential test to Site 441. Allocation of this site in the context of the rejection of allocation of West Moor Park East is contrary to national policy. (SEE SUPPORTING DOCS for Appendices)

Summary:

Policy 4 - Site 441 - Does not Comply with Flood Risk Sequential Test - Para 158 of the NPPF states that development should not be allocated or permitted if there are reasonably available sites in areas with a lower risk of flooding. Para 159 says that the exception test should only be applied if it is not possible for development to be located in zones with a lower risk of flooding. Site 441 is located within FZ3a, in an area of known ponds and ditch drains, including the presence of shallow groundwater and poor surface water drainage. It is therefore necessary to consider whether the development proposed can be accommodated on a suitable site in a lower zone of flood risk. The developable area of West Moor Park East in FZ1 is 48.6 hectares. This could replace all of the Council’s expected Local plan contribution of Site 441 (12.32 hectares) that is located in FZ3a, and twice the total area of the site available for employment use. A sequential test would preferentially select West Moor Park East to Site 441. There is no evidence to suggest that West Moor Park East is not a suitable site for employment. It accords with the spatial strategy and the sequential test requires that site is considered prior to allocation of land in FZ3a. The Local Plan does not properly apply the sequential test to Site 441. Allocation of this site in the context of the rejection of allocation of West Moor Park East is contrary to national policy.

Response:

The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites. This includes reference to flood risk. Site 441 is in flood zone 3 as is Site 013. For potential development in flood risk areas see Policy 58 ‘Flood Risk Management’.
We have compiled a detailed submission which is underpinned by a number of technical and evidence-based studies. We consider that it will be necessary to discuss this evidence with Officers and the Inspector at the Examination.

Tests of Soundness: Positively prepared, Effective, Justified, Consistent with national

Summary: Have concerns about the amount and choice of employment land proposed for allocation in Policy 4. West Moor Park East is the most logical and sustainable option to remedy the problems with the employment land supply proposed by Policy 4. We also demonstrate that the Council’s reasons for non-allocation of West Moor Park East are either inaccurate or they are not sound reasons for rejection of the site. In this objection we refer to a number of other documents. These include the attached Accessibility Technical Note by Sanderson Associates (Appendix 1); the attached A1M/A19 Technical Note by Sanderson Associates (Appendix 1A); the attached Technical Note by Fore Consulting (Appendix 2); the attached Flood Risk report by Fairhurst (Appendix 3); the attached assessment of employment site options by Dove Haigh Phillips (Appendix 4); the attached Vision document (Appendix 5) submitted in support of West Moor Park East in response to the October 2018 Local Plan consultation; and an attached updated Masterplan for West Moor Park East (Appendix 6). This representation should be read in conjunction with our client’s associated objections to Policy 3 and the Site Selection process of the Local Plan. (SEE SUPPORTING DOCS for Appendices)

Response: Noted. The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites.
Comment Ref: C/Policy 4: Sug Change/05197/1/020

Attend Examination: Attend Hearing

Reason: We have compiled a detailed submission which is underpinned by a number of technical and evidence-based studies. We consider that it will be necessary to discuss this evidence with Officers and the Inspector at the Examination.

Area: Chapter 4: Strategic Approach

Policy: Policy 4: Employment Allocations

Tests of Soundness: Positively prepared  Effective
Justified  Consistent with national

Comment:

6.1 Land at West Moor Park East (Sites 1031/937, 1014 and 938) should be included as an additional employment allocation. 6.2 Without prejudice, if West Moor Park East is not included as an additional employment allocation, then it should be identified as a ‘reserve’ employment allocation to provide an additional buffer to, and flexibility in, the employment land supply. This request is consistent with our client’s associated objection to Policy 3.

Summary:

Land at West Moor Park East (Sites 1031/937, 1014 and 938) should be included as an additional employment allocation. If it is not included as an additional employment allocation, then it should be identified as a ‘reserve’ employment allocation to provide an additional buffer to, and flexibility in, the employment land supply.

Response:

Noted. No change required. Section 6 of the ELNA explains how the employment land need figure has been calculated i.e. additional factors such as competition and choice have been taken into account in the final figure. There is also an Employment Land Supply Buffer Note which explains this in more detail. There is no need therefore for additional land to be provided.
Policy 4: Employment Allocations

Response to Council's Reasons for Rejection of West Moor Park East as an Allocation

5.1 The Council's formal reasons for not allocating West Moor Park East are set out at Page 216 of the June 2019 Housing and Employment Site Selection Methodology and Results Report. We summarise each reason and provide a response as follows. As with all the potential sites, this site fails the sequential test as it is within Flood Zone 3. 5.2 Whilst part of West Moor Park East is within FZ3, 54% (48.6 hectares) of the site is located in FZ1, with the remainder being located in FZ3a and FZ2. This quantum of land could replace almost all of the Council's expected Local Plan contribution of Site 001 (51.54 hectares) that is located in FZ3a. It could replace all of the Council's expected Local plan contribution of Site 441 (12.32 hectares) that is located in FZ3a. The attached report by Fairhurst (Appendix 3) therefore concludes that the application of the sequential test would preferentially select West Moor Park East to these two sites. It scores similarly to the other sites through the Sustainability Appraisal Process. 5.3 Our client's associated objection to the Site Selection process of the Local Plan shows that West Moor Park East is more accessible by bus than most of the other proposed employment allocations. Our objection also includes a revised SA that demonstrates that development of West Moor Park East would have material advantages in socio-economic terms over Site 001, a draft allocation. It is currently within Countryside Policy Area as designated by the UDP Proposals Map. 5.4 The extent of the UDP-defined Countryside Policy Area is not up to date. The UDP was adopted in 1998, and was only intended to provide for employment needs up to 2006. 5.5 The Core Strategy post-dates the UDP and Policy CS2 identifies a number of Countryside Policy Areas as broad areas of growth including land around Junction 4 of the M180. This demonstrates that the principle of use of Countryside Policy Area at West Moor Park East to help meet employment needs reflects current policy, and should not be at issue. The Council has proposed allocation of Site 001 for employment and all of this is within a defined Countryside Policy Area, as is all of Site 941. The majority of the site is within the Armthorpe Neighbourhood Plan as Countryside Policy Area (as included in the Core Strategy in Policy CS3). 5.6 Only part of West Moor Park East is located within FZ3. The remainder being located in FZ1 and FZ2. This quantum of land could replace all of the Council's expected Local plan contribution of Site 441 (12.32 hectares) that is located in FZ3a. 5.7 All of the employment land referred to within the Neighbourhood Plan was not required to consider the need for such land to meet the employment needs of Doncaster on a strategic basis. (See EMAIL FOR Amrthorpe Neighbourhood Plan (2018) Proposals Map Extract) 5.8 West Moor Park East is located within Armthorpe Neighbourhood Plan. The majority of the site is within the Armthorpe Neighbourhood Plan as Countryside Policy Area (as included in the Core Strategy in Policy CS3). The site is to the east of the M18 and more isolated than other options that are available across the Borough. The site accords with the spatial strategy of the Local Plan (and also the Core Strategy), as indicated above. West Moor Park East has good links with both the built-up area of Armthorpe and the main urban area of Doncaster. The site is well related to the main residential areas of Armthorpe for large employment uses to cause adverse amenity impacts in respect of HGV movements, noise and light pollution. 5.10 We note that Site 001, a draft employment allocation, is located on the western side of the M18 to the main built up area of Thorne. That site has a similar relationship with Thorne to how West Moor Park East relates to Armthorpe, but it does not receive similar comments in the Site Selection Report. We do not therefore consider that the Council has been consistent in its approach. There are other options directly adjacent to the main urban area and main towns which offer better opportunities for securing sustainable development.
such as long-term public transport access. 5.11 In terms of the draft allocations in the Local Plan, neither Site 941 or Site 001 is located adjacent to the main urban area or a main town. 5.12 The attached report by Sanderson Associates (Appendix 1) shows that the Council has not taken account of the proposals to improve bus accessibility to West Moor Park East that were provided to the Council at October 2018 Local Plan stage. These would provide for a high frequency service to the site on a long-term basis, as First Bus has confirmed that the service would be selffunding after five years. Sanderson Associates also show that compared to a number of the other proposed employment allocations within the Local Plan West Moor Park East would have superior accessibility, and it would also score well in terms of its ability to minimise travel to work distances. This is demonstrated in the extract from the Sandersons report overleaf. Site: 937/1031 West Moor Park East Train Accessibility: N/A Bus Accessibility: 0/Cycle Accessibility: 0 Road Access: + Ability to minimise travel to work distances: + Site: 001 Thorne North Train Accessibility: - Bus Accessibility: - Cycle Accessibility: 0 Road Access: + Ability to minimise travel to work distances: - Site: 092 Balby Carr Bank Train Accessibility: - Bus Accessibility: 0/Cycle Accessibility: 0 Road Access: 0 Ability to minimise travel to work distances: + Site: 441 Carcroft Common Train Accessibility: 0 Bus Accessibility: 0/Cycle Accessibility: 0 Road Access: 0 Ability to minimise travel to work distances: + Site: 878/1032 Rossington Train Accessibility: N/A Bus Accessibility: + Cycle Accessibility: 0 Road Access: 0 Ability to minimise travel to work distances: + Site: 941 Poplars Farm Train Accessibility: - Bus Accessibility: 0/Cycle Accessibility: 0 Road Access: 0/Ability to minimise travel to work distances: 0 Extract from Sandersons Associates Report There are also concerns over vehicular access from Junction 4 of 5.13 Section 3 of the attached report by Fore Consulting (Appendix 2) explains that access arrangements were identified within the Transport and Access Appraisal submitted to the Council as part of our client's response to the October 2018 Local Plan consultation. The works comprise the widening of Holme Wood Lane, which is an adopted public highway to 7.3m between Junction 4 of the M18 and the proposed access point. 5.14 The works that are likely to be necessary would be accommodated within land that is either adopted public highway or on land that is controlled by the promoter. As such, works anticipated to be required on Holme Wood Lane are readily deliverable by the promoter and the details of this can be secured by DMBC through a future planning process. 5.15 The report by Fore Consulting also includes a capacity study that demonstrates that development of West Moor Park East for employment use would give rise to traffic that can be satisfactorily accommodated at Junction 4 of the M18. The main operation issues on the local highway network relate to traffic queuing back from roundabouts on the A630 West Moor Link at certain times. However, it is anticipated that the West Moor Link improvement scheme (the first phase of which is under construction) will resolve the existing queuing issues on the A630 and further improve the capacity and operation of key junctions along the A630 corridor. The allocation of this site would exceed the supply of employment land for this plan period 5.16 Policy 3 of the Local Plan indicates that the 481 hectare employment land requirement is a minimum target. The allocation of West Moor Park East for employment would be in accordance with Policy 3. In any event, in this objection to Policy 4 we have identified issues with the employment land supply in quantitative and choice terms. West Moor Park East is the logical option to address these issues. Sites other than this one have been chosen for allocation in order to provide a balanced distribution of employment land across the Borough. 5.17 Allocation of West Moor Park East would accord with the spatial strategy of the Local Plan, as explained at Para 5.7 above. 5.18 The employment land strategy of the Local Plan has to be deliverable to be effective. The ELNA Update confirms that the majority of the need for employment is for warehousing development, and operators have specific requirements, such as good access to the motorway network, proximity to a labour pool and a high profile location. West Moor Park East is a good fit with these needs. 5.19 Allocation of employment sites such as Site 441 (Carcroft) to provide a ‘balanced distribution’ will not be effective if they do not meet the needs of the market. This objection has demonstrated that this site is unlikely to be brought forward during the plan period due to its dependency on the A1M/A19 link road, the delivery of which is highly uncertain. 5.20 Given all of the above, we do not consider that the Council’s stated reasons for rejection of West Moor Park East are justified, credible or sound overall. (SEE SUPPORTING DOCS for Appendices) Summary: Policy 4 - Response to Council’s Reasons for Rejection of West Moor Park East as an Allocation The Council’s reason for not allocating the site and the response given to this is written below: Council reason: As with all the potential sites, this site fails the sequential test as it is within Flood Zone 3 Response: Part of the site is within FZ3, 54% (48.6 hectares) of the site is located in FZ1, with the remainder being located in FZ3a and FZ2. This amount of land could replace almost all of the Council’s expected Local Plan contribution of Site 001 (51.54 hectares) that is located in FZ3a. It could replace all of the Council’s expected Local plan contribution of Site 441 (12.32 hectares) that is located in FZ3a. The Fairhurst report concludes that the application of the sequential test would preferentially select West Moor Park East to these two sites. Council reason: It scores similarly to the other sites through the Sustainability Appraisal Process Response: The site is more accessible by bus than most of the other proposed employment allocations. The revised SA demonstrates that development of the site could have material advantages on socio-economic terms over site 001 Council reason: It is currently within Countryside Policy Area as designated by the UDP Proposals Map Response: The extent of the UDP-defined Countryside Policy Area is not up to date. The UDP was adopted in 1998, and was only intended to provide for employment needs up to 2006. The Core Strategy post-dates the UDP and Policy CS2 identifies a number of Countryside Policy Areas as broad areas of growth including land around Junction 4 of the M180. This demonstrates that the principle of use of Countryside Policy Area at West Moor Park East to help meet employment needs reflects current policy, and should not be at issue. The Council has proposed allocation of Site 001 for employment and all of this is within a defined Countryside Policy Area, as is all of Site 941. Council reason: The majority of the site is within the Armthorpe Neighbourhood Plan as Countryside Policy Area (as included in the Core Strategy in Policy CS3). Response: Para 30 of the NPPF says that once the Local Plan is adopted the policies will take precedence over the Neighbourhood Plan. The Neighbourhood Plan and the Local Plan are dealing with different issues and at different scales of geography. The Neighbourhood Plan was not bound to the Local Plan, as the spatial strategy of the Local Plan are dealing with different issues and at different scales of geography. The Neighbourhood Plan was not bound to deal with employment needs up to 2006. The Core Strategy post-dates the UDP and Policy CS2 identifies a number of Countryside Policy Areas as broad areas of growth including land around Junction 4 of the M180. This demonstrates that the principle of use of Countryside Policy Area at West Moor Park East to help meet employment needs reflects current policy, and should not be at issue. The Council has proposed allocation of Site 001 for employment and all of this is within a defined Countryside Policy Area, as is all of Site 941. Council reason: The majority of the site is within the Armthorpe Neighbourhood Plan as Countryside Policy Area (as included in the Core Strategy in Policy CS3). Response: Para 30 of the NPPF says that once the Local Plan is adopted the policies will take precedence over the Neighbourhood Plan. The Neighbourhood Plan and the Local Plan are dealing with different issues and at different scales of geography. The Neighbourhood Plan was not bound to designate the employment needed by Doncaster on a Borough wide basis in the most appropriate place. Council reason: The Parish Council were given the opportunity to consider potential employment sites during the preparation of the Neighbourhood Plan, and as a result of that process there is already a substantial amount of employment land within the Parish boundary. Response: Only part of the site is located within the Neighbourhood Plan area. It is an area of land at the periphery of the Plan. The Neighbourhood Plan was not required to consider the need for such land to meet the employment needs of Doncaster on a strategic basis. All of the employment land in the Neighbourhood Plan is either developed or under construction. The new Local Plan looks to provide for employment land needs up to 2035 including within Main Towns. West Moor Park East clearly confirms to the spatial strategy of the Local Plan. Council reason: The site is to the east of the M18 and more isolated than other options that are available across the Borough. Response: The location of the site accords with the spatial strategy of the Local Plan and the Core Strategy. It has good links with both the built-up area of Armthorpe and the main urban area of Doncaster. There is a large available labour pool nearby, thus fostering sustainable travel patterns to work opportunities and minimising in-commuting. The existing and proposed population within a 5 miles/8km would be approximately 86,000 persons, the second highest level compared to the proposed employment allocations of the Local Plan. Population within 8km Travel Distance Site Ref: 937 Location: West Moor Park East Existing Population: 77,500 Existing Households: 33,500 Proposed Population: 9,405 Proposed Households: 4,089 Total Population: 86,905 Total Households: 37,589 Site Ref: 001 Location: Thorne North Existing Population: 29,000 Existing Households: 12,200 Proposed Population: 2,493 Proposed Households: 1,084 Total Population: 31,493 Total Households: 13,284 Site Ref: 441 Location: Carcroft Existing Population: 83,000 Existing Households: 36,200 Proposed Population: 7,390 Proposed Households: 3,213 Total Population: 90,390 Total Households: 39,413 Site Ref: 878/1032 Location: Rossington Existing


The site is not isolated and is well related to a large population. It would benefit from a high frequency bus service. It is not close to residential areas to cause adverse amenity impacts regarding HGV movements, noise and light pollution. Site 001 is located to the west of the M18 and it has a similar relationship with Thorne to how West Moor Park East relates to Armthorpe, yet it does not receive similar comments. The Council has not been consistent in its approach. Council reason: There are other options directly adjacent to the main urban area and main towns which offer better opportunities for securing sustainable development such as long-term public transport access. Response: Neither Site 941 and Site 001 are adjacent to the main urban area or a main town. The Council has not considered the proposals to improve bus accessibility to West Moor Park East. The site would have superior accessibility and would minimise travel to work distances. This is shown below:

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We have compiled a detailed submission which is underpinned by a number of technical and evidence-based studies. We consider that it will be necessary to discuss this evidence with Officers and the Inspector at the Examination.

Policy 4: Employment Allocations

Tests of Soundness: Positively prepared

Effective

Justified

Consistent with national

Comment:

Policy 4 - Insufficient Land Allocated to Meet Employment Land Requirement in respect of Choice 3. The table of the employment land portfolio proposed at Page 38 of the Local Plan indicates that 25% (118 hectares) has already been developed. A further 42% (201 hectares) of the supply already has planning permission, leaving a balance of 34% (162 hectares) to be provided in new allocations to meet the Policy 3 minimum requirement of 481 hectares. 3.2 Given that only a third of the employment land supply up to 2035 is therefore uncommitted, we are concerned about the ‘choice’ of new employment land that will be available over the plan period for large users, particularly those with needs of a strategic scale. The reasons for this concern are as follows: - A) our associated objection to Policy 3 shows that Doncaster has one of the fastest growing economies in the North of England, with a significantly higher GVA than the national or regional average. It is a high demand location - if Doncaster does not provide a sufficient choice of large sites to meet the demands of the market it will lose potential investment and employment to other Local Authority areas that offer such land; - B) the ELNA Update 2019 indicates that almost three quarters of the employment land need over the plan period is of a specific type i.e. non-strategic and strategic warehousing. The attached report by Dow Haigh Phillips (Appendix 4) states that such employment requires scale, proximity to high profile locations which are really accessible from the major transport networks and proximity to a labour pool; and - C) in relation to sites that already have planning permission, there are only 3 that would be considered suitable for warehousing, the largest component of the employment land need - Site 418 (Unity/DN7), Site 747 (iPort) and Site 1099 (West Moor Park Extension). 3.3. Having regard to the above, in this context the Local Plan only allocates 6 new sites that will contribute to the employment land supply. Two of these, Sites 092 (Balby Carr Bank) and 258 (Plot 1 Lakeside) are less than 10 hectares in size, more suited to localised business needs and not geared to address the considerable warehousing requirement identified by the ELNA. 3.4 Site 441 (Land at Carcroft Common) has poor access to the motorway network, and we explain above why we do not consider that this side will contribute to the Local Plan employment land requirement, due to the high level of uncertainty associated with the A1M/A19 link. 3.5 This leaves two other sites allocated for development, Site 001 (Thornton North) and Site 941 (Site 2, Land east of Poppers Farm). Site 001 is, in our view, the only large site that is allocated within the plan that has good access to the motorway network, albeit the labour pool is limited for this opportunity, as stated above. As explained within the attached report by Dow Haigh Phillips (Appendix 4), Site 941 is remote from the motorway network and its success will be connected with the success of the airport. 3.6 In summary, we consider that Policy 4 does not provide a sufficient range and choice of sites available for large scale users during the plan period up to 2035 and it is therefore not positively prepared, justified or effective. The number of sites allocated is modest relative to the acknowledged success of the Doncaster economy, and only a single site is well-suited to meet the key warehousing requirement identified by the ELNA. (SEE SUPPORTING DOCS for Appendices)

Summary:

Policy 4 - Insufficient Land Allocated to Meet Employment Land Requirement in respect of Choice 3. The table proposed on page 38 of the Plan indicates that 25% (162 ha) has already been developed. 42% (201 ha) already has planning permission which leaves 34% (162 ha) to be provided as new allocations. Concerned about the ‘choice’ of new sites employment land that will be available over the plan period for large scale users. The reasons for this are: 1. Doncaster has one of the fastest growing economies in the north and it will lose potential investment and employment if it does not provide a sufficient choice of large sites. 2. The ELNA update 2019 indicates that almost three quarters of employment land need is of a specific type (non-strategic and strategic warehousing). The evidence base submitted with this representation states that this type of employment requires scale, proximity to high profile locations which are accessible from major transport networks, and proximity to a labour pool. 3. There are only 3 sites with planning permission which are considered suitable for warehousing - Site 418 (Unity), Site 747 (iPort) and Site 1099 (West Moor Park Extension). The Local Plan only allocates 6 new sites and 2 of these are less than 10 ha in size and more suited to local business needs. Site 441 (Carcroft Common) has poor access to the motorway which leaves 2 other sites for development: Thorne North (001) and Site 2, land east of Poppers Farm (941). Thorne North has good access to the motorway but the labour pool is limited and site 941 is remote from the motorway and its success is connected with the airport. In summary Policy 4 does not provide a sufficient range and choice of sites available for large scale users during the plan period, therefore it is not positively prepared, justified or effective. The number of sites is modest relative to the acknowledged success of the Doncaster economy and only one site is well suited to meet the warehousing needs identified in the ELNA.

Response:

Comments noted. The Employment land Supply Figure as explained in the ELNA is ambitious and realistic. Section 6 of the ELNA explains how the employment land need figure has been calculated i.e. additional factors such as competition and choice have been taken into account in the final figure. There is also an Employment Land Supply Buffer Note which explains this in more detail. There is no need therefore for additional land to be provided.
Policy 4: Employment Allocations

The site comprises a significant amount of land promoted by two willing landowners which can make a valuable contribution to the employment land requirement; West Moor Park East has good links with both the built development extending to in excess of 55% (48.6 hectares) of West Moor Park East is in FZ1, the lowest zone of flood risk. As explained in the attached report by Fairhurst (Appendix 3), our client has held discussions with the Environment Agency to agree in principle that the remainder of the site can be developed for employment, subject to mitigation; Written agreement has been reached with First Bus to extend the existing 15 Service into the site to provide high frequency bus services, as explained in the attached reports by Fore Consulting and Sanderson Associates (Appendices 1 and 2). First Bus have confirmed that they anticipate that this service would be self-funding after five years; West Moor Park East has good links with both the built-up area of Armthorpe and the main urban area of Doncaster. These links will be improved by the proposed dualling and other improvements to the A630 (West Moor Link), which are funded and under construction. Table 7 of the Local Plan confirms that the West Moor Link is intended to facilitate the unlocking of employment development along the route - which West Moor Park East would be consistent with; - Given the proximity of West Moor Park East to Armthorpe and the main urban area of Doncaster, there would be a large available labour pool nearby, thus fostering sustainable travel patterns to work opportunities and minimising in-commuting. The attached report by Sanderson Associates (Appendix 1) shows that within 5 miles/8km the existing and proposed population would be approximately 86,000 persons, the second highest potential labour force compared to the proposed employment allocations of the Local Plan. (ii) Commercial Factors 4.9 There are presently six well known commercial developers that have expressed serious interest in the development of West Moor Park East for employment. This is a good barometer of the commercial suitability of the site. The attached report by Dove Haigh Phillips (Appendix 4) identifies other relevant factors as follows: - West Moor Park East is part-previously-developed, with an extant planning permission for major motorsport and leisure uses, as explained in the attached Vision Document; - 55% (48.6 hectares) of West Moor Park East is in FZ1, the lowest zone of flood risk. As explained in the attached report by Fairhurst (Appendix 3), our client has held discussions with the Environment Agency to agree in principle that the remainder of the site can be developed for employment, subject to mitigation; - Written agreement has been reached with First Bus to extend the existing 15 Service into the site to provide high frequency bus services, as explained in the attached reports by Fore Consulting and Sanderson Associates (Appendices 1 and 2). First Bus have confirmed that they anticipate that this service would be self-funding after five years; - West Moor Park East has good links with both the built-up area of Armthorpe and the main urban area of Doncaster. These links will be improved by the proposed dualling and other improvements to the A630 (West Moor Link), which are funded and under construction. Table 7 of the Local Plan confirms that the West Moor Link is intended to facilitate the unlocking of employment development along the route - which West Moor Park East would be consistent with; - Given the proximity of West Moor Park East to Armthorpe and the main urban area of Doncaster, there would be a large available labour pool nearby, thus fostering sustainable travel patterns to work opportunities and minimising in-commuting. The attached report by Sanderson Associates (Appendix 1) shows that within 5 miles/8km the existing and proposed population would be approximately 86,000 persons, the second highest potential labour force compared to the proposed employment allocations of the Local Plan. - Major motorsport and leisure developments are proposed on the opposite side of the motorway from West Moor Park which is a proven and established employment location. None of the other sites with a draft allocation can demonstrate these fundamental characteristics; - The site has direct frontage to the M18 including the south bound exit slip road and frontage from the Junction 4 roundabout into the site; - The site is located close to existing built development extending to in excess of 2,500,000 sq ft of large format buildings and several other smaller units. Occupiers, developers and investors are attracted to sites and locations which have a proven track record of delivering sustainable development over may economic cycles; - The site has close proximity to the labour pool of Armthorpe. This will allow development at the site to contribute to minimising travel to work distances (irrespective of any bus improvements which would also provide access to a significant workforce via extension of the No.15 service) Achievability 4.10 The attached report by Dove Haigh Phillips (Appendix 4) concludes that due to a combination of the key characteristics above, high quality development at...
West Moor Park East is eminently achievable. Dove Haigh Phillips find that the site satisfies all of the six key occupier requirements as set out in Section 6 of their report. 4.11 In the light of the above, we conclude that West Moor Park East is an extremely good fit to address the employment land supply deficiencies we have identified, in both planning and commercial terms. At Issue 4 below we respond the Council’s stated reasons for rejection of the site as an allocation. (SEE SUPPORTING DOCS for Appendices)

Summary:

Policy 4 - Most Appropriate Option to Address Deficiencies in Employment Land Supply - West Moor Park East (Site 937/1031/938/1014  Policy 4 can be made more sound by including West Moor Park East as an additional allocation. The site has been intensively promoted by the client to the Council (in 2018/2019) and numerous meetings haven taken place as well as a public exhibition in 2019. Since October 2018, engagement has taken place with the adjacent landowner of site 938/1014 and they have confirmed their willingness to promote their land in collaboration. This potential development area has not increased from 79 ha to 88.54 ha and a revised masterplan has been prepared. West Moor Park East is the most appropriate option to address deficiencies in the employment land supply for the following reasons: Availability The entire site is in two ownerships who are collaborating to promote the land. Vacant possession can be delivered at short notice. Land necessary to deliver access is within the public highway and within ownership of existing land owners. Suitability The development of the site is consistent with the plan’s spatial strategy. Policy 3 indicates that B1, B2 and B8 classes in main towns will be met in locations with good access to the M18/M180 network. Junction 4 is an established location for large scale employment. The Core Strategy identifies this junction as an area for growth. Other relevant planning factors include: - West Moor Park East is part-previously-developed, with an extant planning permission for major motorsport and leisure uses; - West Moor Park East comprises land of a low landscape quality, as explained in the attached Vision Document; - 55% (48.6 hectares) of West Moor Park East is in FZ1, the lowest zone of flood risk and discussions have taken place with the Environment Agency to agree in principle that the remainder of the site can be developed for employment, subject to mitigation; - Written agreement has been reached with First Bus to extend the existing 15 Service into the site to provide high frequency bus services; - West Moor Park East has good links with both the built-up area of Armthorpe and the main urban area of Doncaster. These links will be improved by the proposed dualling and other improvements to the A630 (West Moor Link), which are funded and under construction. There is a large available labour pool nearby. There are six well known commercial developers that have expressed serious interest in the development of the site.

Response:

Noted. The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites.
Chapter 4: Strategic Approach

Policy 4: Employment Allocations

We have compiled a detailed submission which is underpinned by a number of technical and evidence-based studies. We consider that it will be necessary to discuss this evidence with Officers and the Inspector at the Examination.

Policy Tests of Soundness:
- Positively prepared
- Effective
- Justified
- Consistent with national

Reason:
There is no information available about the precise route of the link road. It is simply an indicative line; the Southern Pennines Strategic Development Corridor - Strategic Outline Case (SOC) March 2019 explains that the link road is at a very early stage of assessment, with no positive funding available. The SOC states that delivery of this transport intervention "should not be relied upon for planning and development purposes". The timescale for the delivery of the link road is a significant unknown if it happens at all. There will be need for decisions to be taken about priorities and funding, other schemes will be competing for funding, and even when high level decisions are taken, they are susceptible to being reviewed; and - Beyond this there will be a need for technical work and compulsory purchase of land. This is likely to take implementation beyond the Local Plan period, if the link road happens at all. Concerns about the delivery of the A1M to A19 link road there is no certainty about the delivery of Site 441. It is not a justifiable or effective allocation. 2.11 Regarding drainage, the attached report by Fairhurst (Appendix 3) shows that Site 441 is not only in Flood Zone 3, but it is located in an area of known ponds and ditch drains, including the presence of shallow groundwater and poor surface water drainage. This may impact on the suitability and viability of the site for employment and no evidence has been provided by the Council to demonstrate otherwise.

Concerns about Site 878/1032 relates to land that was allocated in the Doncaster UDP for employment/as an employment policy. This site has been occupied by an existing tanker supplier business for almost 40 years. It is not considered to be a suitable site for employment purposes, and does not meet the quantum of land required by the Local Plan. This site is an example of a site that has been developed for new employment uses despite the passage of 21 years, which indicates that there are some significant constraints to its development. The UDP acknowledges that the site has significant issues, particularly in relation to access and drainage. The Local Plan and evidence base does not provide evidence that these constraints have been overcome.

Concerns about Site 441 Land at Carcroft Common. All of this site was identified as land to be safeguarded for employment use in the adopted UDP, but it has not been developed for new employment uses despite the passage of 21 years, which indicates that there are some significant constraints to its development. The UDP acknowledges that the site has significant issues, particularly in relation to access and drainage. The Local Plan and evidence base does not provide evidence that these constraints have been overcome. 2.9 In relation to access, Paras 4.31 and 4.58 of the Local Plan and the Site Selection Report indicate that development of Site 441 is dependent on construction of a new A1M to A19 link road. However, whilst there is reference to this road in Policy 13 of the plan, it is no more than an aspiration at this stage. The attached Technical Note by Sanderson Associates (Appendix 1A) indicates that: - There is no information available about the precise route of the link road. It is simply an indicative line; - The Southern Pennines Strategic Development Corridor - Strategic Outline Case (SOC) March 2019 explains that the link road is at a very early stage of assessment, with no positive funding available. The SOC states that delivery of this transport intervention "should not be relied upon for planning and development purposes"; - The timescale for the delivery of the link road is a significant unknown if it happens at all. There will be a need for decisions to be taken about priorities and funding, other schemes will be competing for funding, and even when high level decisions are taken, they are susceptible to being reviewed; and - Beyond this there will be a need for technical work and compulsory purchase of land. This is likely to take implementation beyond the Local Plan period, if the link road happens at all. 2.10 In the absence of certainty about the delivery of the A1M to A19 link road there is no certainty about the delivery of Site 441. It is not a justifiable or effective allocation. 2.11 Regarding drainage, the attached report by Fairhurst (Appendix 3) shows that Site 441 is not only in Flood Zone 3, but it is located in an area of known ponds and ditch drains, including the presence of shallow groundwater and poor surface water drainage. This may impact on the suitability and viability of the site for employment and no evidence has been provided by the Council to demonstrate otherwise.

Concerns about Site 001 Thorne North. The attached report by Dove Haigh Phillips (Appendix 4) comments that Thorne is not an established hub for warehousing development and existing employment development has taken place over a much longer period of time than the pace achieved at iPort and West Moor Park. 2.14 Dove Haigh Phillips also note that Site 001 is not well related to the main urban area of Doncaster (as recognised by the Colliers Employment Land Review 2018) and there is a limited catchment population to provide a local labour force to support a large scale development at Thorne North (as demonstrated at Section 3 of the attached report by Sanderson Associates (Appendix 1)). 2.15 In light of the above Dove Haigh Phillips question whether Site 001 could deliver the quantum of land anticipated by the Local Plan (51.54 hectares) over the plan period. Dove Haigh Phillips consider that it is more likely that the site would deliver 36.8 hectares, as estimated by the Colliers Employment Land Review 2018 (and subsequent amendments). 2.16 This leaves a 14.74 hectares shortfall in the contribution that Site 001 would make towards the employment land target. Concerns about Site 941 Land at Bankwood Lane, Rossington. 2.5 Site 878/1032 relates to land that was allocated in the Doncaster UDP for employment/as an employment policy area. However, this site has been occupied by an existing tanker supplier business for almost 40 years. 2.6 We consider that it is inappropriate to rely on Site 878/1032 as an employment option that will count towards the minimum 481 hectare target. As explained in the attached report by Dove Haigh Phillips (Appendix 4), the reality is that this site is an 'existing' employment site that has been in employment use well before the base date of the new Local Plan. If it is taken up by a new business(es) that would not represent a net addition to Doncaster's employment land supply; rather it would be a change in the occupier of the land. 2.7 This leaves a 17.68 hectare shortfall in land needed to meet the target. Concerns about Site 441 Land at Carcroft Common. All of this site was identified as land to be safeguarded for employment use in the adopted UDP, but it has not been developed for new employment uses despite the passage of 21 years, which indicates that there are some significant constraints to its development. The UDP acknowledges that the site has significant issues, particularly in relation to access and drainage. The Local Plan and evidence base does not provide evidence that these constraints have been overcome.
Employment Land Requirement in Quantitative Terms: Conclusion

2.20 Given that Site 878/1032 is already in employment use it does not provide a net contribution to the employment land supply of Doncaster through allocation under Policy 4. The 17.68 hectare employment land supply contribution from this site should be deleted. 2.21 There is considerable risk about the delivery of Site 441. In the absence of certainty about the delivery of the A1M to A19 link road there is no certainty about the Local Plan contribution of this site. The assumed contribution that Site 441 will make towards the employment land supply, 12.32 hectares, is not sound. 2.22 Based on the professional commercial judgements of Colliers and Dove Haigh Phillips, there is also concern about the Local Plan contribution of Sites 001 and 941. Doubt has been cast on delivery of 49 hectares of land from these two sites during the plan period. 2.23 We therefore conclude that the total quantitative shortfall of land from allocated sources needed to meet the minimum employment land requirement could be as high as 78 hectares. The plan is not positively prepared, justified or effective in that regard. 2.24 This also assumes that there is no slippage of delivery from sites with planning permission.

However, as explained in our objection to Policy 3, Dove Haigh Phillips also advise that in respect of employment sites with planning permission, which make up 201 hectares (42%) of the employment land supply, it is advisable to allow for a modest slippage rate of 10% due to unforeseen constraints. This would amount to a further potential 20-hectare delivery shortfall in the employment land supply of the Local Plan. (SEE SUPPORTING DOCS for Appendices)

Summary:

Policy 4 - Insufficient Land Allocated to Meet Employment Land Requirement in Quantitative Terms

Policy 4 (like Policy 3) does not provide a buffer of land over and above the 481 ha requirement. This is a high risk strategy, bearing in mind it is difficult to accurately predict delivery of sites over a 20 year period. The plan is therefore not positively prepared or justified. There is a very strong likelihood that the employment land allocations will not deliver 481 ha of land: Concerns about Site 878/1032 East of Bankwood Lane, Rossington This site was allocated in the UDP for employment uses and has been occupied by an existing tanker supplier for 40 years. It is inappropriate to rely on this site to count towards supply. This is an existing site which if taken up by a new business would not represent a net addition to supply. It would be a change of occupier. This leaves a 17.68 hectare shortfall in land needed to meet the target. Concerns about Site 441 Land at Carkcroft Common The whole site was identified for employment use in the adopted UDP, but it has not been developed. This indicates that there are significant constraints. The UDP acknowledges that there are issues, particularly in relation to access and drainage. The Local Plan and evidence base do not show that these constraints have been overcome. Paras 4.31 and 4.58 of the Local Plan and the Site Selection Report indicate that development is dependent on the construction of a A1M to A19 link road. Policy 13 references this as an aspiration at this stage. The Technical Note by Sanderson Associates (attached as Appendix 1A) states that: - There is no information available about the precise route of the link road. - The Southern Pennines Strategic Development Corridor - Strategic Outline Case (SOC) March 2019 explains that the link road is at a very early stage of assessment, with no positive funding available. - The timescale for the delivery of the road is a significant unknown if it happens at all. Decisions need to be taken about priorities and funding, other schemes will be competing for funding, and even when high level decisions are taken, they are susceptible to being reviewed; and - There is a need for technical work and compulsory purchase of land. A report by Fairhurst (attached as an appendix) shows that Site 441 is in Flood Zone 3, and is also located in an area of ponds and ditch drains, including the presence of shallow groundwater and poor surface water drainage. There is no evidence from the Council to demonstrate how these will not impact on the suitability and viability of the site. The delivery of Site 441 is not justified, it is not an effective allocation and is not sound. Concerns about Site 001 Thorne North The Dove Haigh Phillips (attached as an Appendix) comments that Thorne is not an established area for warehousing and that existing development has taken place over a long period of time. It is also not well related to the main urban area of Doncaster and there is a limited catchment population to provide a local labour force. It is questioned that site 001 could deliver the amount of anticipated land over the plan period (51.54 ha). It is more likely to deliver 36.8 hectares, as estimated by the Colliers Employment Land Review. This leaves a 14.74 hectares shortfall in the contribution that Site 001 would make towards the employment land target. Concerns about Site 941 Site 2, Land East of Poplars Farm, Hurst Lane, Auckley The Dove Haigh Phillips report explains that development of Site 941 will be contingent on the growth of the airport and airport-related businesses. The aggregate of the adjacent Site 517 and Site 941 is 112.59 hectares. Given the scale of land available and the remoteness from the motorway network, it is questioned whether Site 941 could deliver the amount of land anticipated by the Local Plan (68.54 ha). It is considered that it is more likely that the site would deliver 50%, which amounts to 34.27 hectares. In summary, as Site 878/1032 is already in employment use, it does not provide a net contribution to the employment land supply and this contribution should be deleted. There is risk about the delivery of Site 441 particularly in the absence of certainty about the delivery of the A1M to A19 link road so this assumed contribution is not sound. There is also concern about the Local Plan contribution of Sites 001 and 941. Doubt has been cast on delivery of 49 hectares of land from these two sites during the plan period. It is concluded that the total quantitative shortfall of land from allocated sources needed to meet the minimum employment land requirement could be as high as 78 hectares. Therefore the plan is not positively prepared, justified or effective. Allowance should also be given for a modest slippage rate of 10% for sites with planning permission. Sites with permission make up 201 hectares (42%) of the employment land supply. A 10% slippage would result in a potential 20-hectare delivery shortfall in the employment land supply of the Local Plan.

Response:

The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites. Noted. No change required. Section 6 of the ELNA explains how the employment land need figure has been calculated i.e. additional factors such as competition and choice have been taken into account in the final figure. There is also an Employment Land Supply Buffer Note which explains this in more detail. There is no need therefore for additional land to be provided.
We have compiled a detailed submission which is underpinned by a number of technical and evidence-based studies. We consider it will be necessary to discuss this evidence with Officers and the Inspector at the Examination.

**Tests of Soundness:**
- Positively prepared
- Effective
- Justified
- Consistent with national

**Comment:**
Inaccurate Sustainability Appraisal Scores for West Moor Park East (Site 937/1031) 3A(ii) Distance to Bus Stop

3.1 In addition to the concerns regarding the SA appraisal approach relating to public transport accessibility, which are detailed in the attached Sandersons Associates report (Appendix 1), there is a clear inaccuracy regarding the scoring of SA 3A(ii). 3.2 As explained above, at the 2018 Informal Draft Local Plan consultation stage Blue Anchor Leisure submitted a package of information specific to West Moor Park East (Site 937/1031/938/1014), including written confirmation with costs from First Bus that an existing frequent bus route (Service 15) can be extended into the site; and that this service could become viable after five years without subsidy. 3.3 The extension of the 15 Service frequent bus route into the site should result in a light green score in relation to ‘distance to bus stop (3A(ii))’ as this would result in a stop within the proposed development, but West Moor Park East is currently awarded a pink (negative) score. 8A(i) Encourage the Re-use of Land and Buildings 3.4 In the SA West Moor Park East (Site 937/1031/938/1014) is awarded an orange (neutral) score in relation to the re-use of land and buildings (8A(i)) which indicates that it is wholly a greenfield site that has not been previously-developed. 3.5 However, the land occupied by West Moor Park East accommodates numerous roads, tracks, car parking areas and structures associated with the existing motorsport uses on the site; and abandoned buildings associated with the former Holme Wood Farm - as demonstrated by the pictures and site description provided to the Council in the Vision document that was submitted at the 2018 Informal Draft Local Plan consultation stage (Appendix 5). It is inaccurate to refer to it as a wholly greenfield site. The site should be awarded a light green score (site is located on brownfield land and would bring back into effective use previously-developed land and/or buildings (gross area up to 4 ha). 13B(i) Archaeology 3.6 The SA identifies that there would be significant negative effects (red score) on archaeology (13B(i)) with the development of West Moor Park East (Site 937/1031/938/1014) that may not be possible to mitigate. However, the part of the site identified as having a constraint already has a part implemented and extant planning permission for major motorsport and leisure uses (LPA refs: 09/00728/OUTA and 10/01593/REMM) - which is a clear indication that development is acceptable. The proposed development of the site for employment would give rise to no greater impact on archaeology than this fallback position and therefore it should be awarded an orange (no adverse impact) score. At worse the score should be pink (adverse impact which may be possible to mitigate). (SEE SUPPORTING DOCS for Appendices)

**Summary:**
Inaccurate Sustainability Appraisal Scores for West Moor Park East (Site 937/1031)

**Response:**
Responses to Representations in respect to SA are set out in the Wood Environment & Infrastructure SA Report Addendum. The SA scoring process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites. The Housing and Employment Site Selection and Result Report provides further information.
Concerned about a number of aspects regarding the Site Selection Methodology for employment sites. This particularly concerns:

- the soundness of the Sustainability Appraisal methodology and scoring points that the Council has used to assess the sites - inaccurate SA scores for the rejected employment option at West Moor Park East (Site 937/1031) - and inaccurate and inconsistent SA scores for proposed employment allocations 001, 092, 441 and 941. We also have concerns about the application of the flood risk sequential test to employment site options. We have compiled a detailed submission which is underpinned by a number of technical and evidence-based studies. We consider it will be necessary to discuss this evidence with Officers and the Inspector at the Examination.

The SA scoring process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites. The Housing and Employment Site Selection and Result Report provides further information.
**CUSREF:** 05197  **Name:** Peacock And Smith  
**Date:** 30/09/2019  **Organisation:** Peacock and Smith  
**Representing:** Blue Anchor Leisure Limited

**Comment Ref:** C/Site: Sequential Test/05197/1/009  
**Attend Examination:** Attend Hearing  
**Reason:** We have compiled a detailed submission which is underpinned by a number of technical and evidence-based studies. We consider that it will be necessary to discuss this evidence with Officers and the Inspector at the Examination.

**Area:** Chapter 4: Strategic Approach  
**Policy:** Policy 4: Employment Allocations

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**Comment:**
Site Selection - Failure to Apply Sequential Test  Para 158 of the NPPF states that development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. This is a fundamental purpose of the sequential test for flooding.  
6.2 However, Section 4.4 of the attached report by Fairhurst (Appendix 3) shows that the developable area of West Moor Park East Site 937/1031/938/1014 in FZ1 is 48.6 hectares. This quantum of land could replace almost all of the Council's expected Local Plan contribution of Site 001 (51.54 hectares) that is located in FZ3a. It could replace all of the Council's expected Local Plan contribution of Site 441 (12.32 hectares) that is located in FZ3a. Fairhurst therefore conclude that the application of the objectives of the sequential test would preferentially select West Moor Park East to these two sites.  
6.3 In the light of the above we consider that the application of the sequential test to employment site options is flawed. This is an issue of considerable concern given that the sequential test was identified by the Inspector for the withdrawn Doncaster Sites and Policies DPD in a letter dated 3 June 2014 (Appendix 7). At Para 42 of that letter the Inspector concluded: "42. I am not persuaded that the Council has applied these tests as stringently as the NPPF requires. I do not consider that the Council's starting point has been to seek to steer development away from areas with the highest probability of flood risk. I have seen no evidence that this objective has been properly weighed against wider sustainability objectives or that such an exercise has demonstrated that it is 'not possible' to locate development in areas of lower probability of flooding. It is only when these matters have been fully assessed that the Exceptions Test should be applied. As its name suggests the test should involve only exceptional cases. Again I have seen no clear evidence that the Council has weighed the risk from flooding against the wider sustainability benefits to the community which would accrue. Site-specific flood risk assessments have not been carried out in all cases."  
6.4 Until the sequential test is correctly applied for employment site options (which would inevitably require land to be allocated at West Moor Park East in preference to Sites 001 and 441) we consider that there is a considerable risk that the Local Plan will be found unsound for similar flood risk reasons as identified in respect of the Sites and Policies DPD.  
(SEE SUPPORTING DOCS for Appendices)

**Summary:**
Site Selection - Failure to Apply Sequential Test  Para 158 of the NPPF states that development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. This is a fundamental purpose of the sequential test for flooding. However the evidence submitted as part of the representation shows that the developable area of West Moor Park East in FZ1 is 48.6 ha. This amount of land should replace almost all of the Council's expected Local Plan contribution of Site 001 (51.4 ha) that is located in FZ3a. It could replace all of the Council's expected contribution of Site 441 (12.32 ha) that is located in FZ3a. The sequential test applied to employment sites is flawed and this is an issue for concern when considering the Inspector's findings on the Sites and Policies DPD. Until the sequential test is correctly applied for the employment site options (which would inevitably required West Moor Park East to be allocated in preference to Sites 001 and 441) there is considerable risk that the Local Plan will be found unsound for similar flood risk reasons as per the Sites and Policies DPD.

**Response:**
The SA scoring process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites including flood risk. The Housing and Employment Site Selection and Result Report provides further information.
Our full response is provided by supporting letter dated 26th September 2019 (L017) and associated Plan 1. The response should therefore be read in the wider context of that letter. Policy 4 - Employment Allocations (Strategic Policy) Policy 4 'Employment Allocations (Strategic Policy)' allocates land for employment uses in accordance with those sites identified by Table 4 of the Publication Draft Plan and the accompanying Proposals Map. On those sites allocated for employment uses, emerging Policy 4 sets out that: a) Only business (B1 b/c), general industry (B2) and storage and distribution (B8) uses will be permitted on these sites unless the proposal is ancillary to the employment use. b) The employment sites will be developed in accordance with the development requirements set out in Appendix 2 and other relevant Local Plan policies. c) For employment or other developments that propose 20+ direct jobs, the Council will seek to enter into a local labour agreement with the developer/applicant to provide an agreed percentage target for local labour, a training and recruitment plan and a commitment to an agreed target for the proportion of local procurement of services and supplies. Whilst TVI support identification of their land for employment uses (Site Ref: 1032) it is considered that in order for emerging Policy 4 to be considered fully effective, justified, in line with national policy and therefore "sound", a degree of flexibility should be afforded in the policy for consideration of other uses that are not ancillary. This would allow the plan to adapt to any changes in the market. The National Planning Policy Framework (2019) makes clear at paragraph 11 a) that "plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change". Again, at paragraph 81, planning policies should "be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices [...] and to enable a rapid response to changes in economic circumstances". Flexibility should be built into the wording of Policy 4 to enable other uses to be considered should circumstances change and to allow the plan to be able to provide a rapid response to changes in economic circumstances or other rapid change in an area not envisaged in the plan. Policy 4 (A) On this basis, the inclusion of a criteria-based approach in Policy 4, such as that proposed for Employment Policy Areas under emerging Policy 5, would be supported. It is noted that in 'employment policy areas' other uses are 'supported' provided a number of criteria are met. Policy 4 (A) allocates the employment sites 'only' for B1(b/c), B2 and B8. Other uses are allowed but 'only' where they are ancillary. In order to accord with national policy and provide some flexibility in approach, we consider Policy 4 (A) could be reworded as follows with proposed new policy wording underlined. "A) Only business (B1 b/c), general industry (B2) and storage and distribution (B8) uses will be permitted on these sites unless the proposal is ancillary to the employment uses where an alternative use would accord with the Policy 5 criteria and other relevant policies in the Plan." This would ensure the emphasis is on such sites being brought forward for B1(b/c), B2/B8 uses but allows consideration of other non ancillary uses in particular circumstances in line with national planning policy. Policy 4 (C) Policy 4 (C) seeks to enter into local labour agreements to agree target percentages for use of local labour, establish a training and recruitment plan and provide a commitment for an agreed target for local procurement of services and supplies. Whilst our client supports use of local businesses and suppliers in new developments, such a policy requirement could prevent a full and proper competitive tendering process for new developments and limit the use of certain contractors resulting in them not being able to tender for projects related to the site. This could have adverse consequences on the ability of our client to deliver economic investment on the site in the most cost effective manner. This relates to both the construction and operation phase of any development brought forward. Consequently, we consider such a policy should not be included within the development plan and whilst discussions can take place on individual sites, inclusion of the Policy 4(C) criteria could hamper delivery of some projects in a very competitive market and the uncertain economic climate. On this basis we request that Criteria (C) in Policy 4 be deleted from the policy wording.
Summary:
The representation includes an additional document providing information on land in the control of Tanks and Vessels Industries. It includes information on site description, previous applications, references the Local Plan policies 2, 4 and 5 and comments further on policies 4 and 5. TVI support identification of their land for employment uses (Site Ref: 1032). Policy 4 needs more flexibility (like policy 5) to include other uses that are not ancillary. This would allow the plan to adapt to any changes in the market. (quotes NPPF paragraph 11 ("plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change") and Paragraph 81 (be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices […] and to enable a rapid response to changes in economic circumstances") Policy 4A - include a criteria based approach in policy 4 (as in Policy 5)? it is noted that in 'employment policy areas' other uses are 'supported' provided a number of criteria are met. Policy 4 (A) 'only' allocates B1(b/c), B2 and B8 where ancillary. Suggest rewording (shown in capitals)- “A) Only business (B1 b/c), general industry (B2) and storage and distribution (B8) uses will be permitted on these sites unless the proposal is ancillary to the employment use OR WHERE AN ALTERNATIVE USE WOULD ACCORD WITH THE POLICY 5 CRITERIA AND OTHER RELEVANT POLICIES IN THE PLAN.” Policy 4 C) seeks to enter into local labour agreements and agree percentages of local labour use? this could prevent a full and proper competitive tendering for new developments, limit the use of certain contractors and have adverse economic investment consequences. Policy 4 C) should be deleted from the policy wording.

Response:
No change proposed to Criteria A. These sites are allocated for employment use in order to meet the job need for the borough and are protected for that purpose. No change proposed to Criteria C. The aim of local labour agreements is to ensure that local people benefit from development in the borough. The Council works closely with employers and local training providers to ensure that this happens.
Bankwood Lane, Rossington

tables 4 confirms that the allocated site at Bankwood Lane comprises a
Site Ref. 1032

criteria could hamper delivery of some projects in a very competitive market and the uncertain economic climate. On this bas-

manner. This relates to both the construction and operation phase of any development brought forward. Consequently, we consi-

the site. This could have adverse consequences on the ability of our client to deliver economic investment on the site in the

training and recruitment plan and provide a commitment for an agreed target for local procurement of services and supplies. Under Table 4, sites to be allocated for employment uses include: - Site Ref. 1032 - Bankwood Lane, Rossington Table 4 confirms that the allocated site at Bankwood Lane comprises a
gross site area of 17.84ha which is identified as available for employment uses and is to be developed in the plan period. The Policies Map

TVI support the identification of land within their ownership at Bankwood Lane, Rossington as an employment site for
B1(b/c), B2 and B8 uses under emerging Policy 4 of the Local Plan Publication Draft. The allocation of Site Ref. 1032 will contribute towards the

employment development needs of TVI and the Doncaster Borough, with Rossington identified under emerging Policy 2 as a Main Town where
appropriate levels of employment growth are to be located. The site is considered to be suitable for employment uses given its location within
the existing Bankwood Lane Industrial Estate and that it benefits from excellent connectivity with the strategic road network (SRN) including the
recently completed Great Yorkshire Way to the north. Further connectivity between the site and the SRN would be supported by the Link Road
proposed under applications 18/00548/FULM & 18/02114/FULM which would connect the industrial estate to the West End Lane Roundabout to
the west and the SRN beyond, boosting the productivity and efficiency of the industrial estate. However, in line with representations submitted to
the Local Plan Draft Policies consultation in October 2018, while TVI support the identification of their land for employment uses (Site Ref:
1032) it is considered that in order for emerging Policy 4 to be considered fully effective, in line with national policy and therefore 'sound', a
degree of flexibility should be afforded in the policy for consideration of other uses that are not ancillary. This would allow the plan to adapt to
any changes in the market. The National Planning Policy Framework (2019) makes clear at paragraph 11 a) that "plans should positively seek
opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change". Again, at paragraph B1, planning policies should "be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices [...] and to enable a rapid response to changes in economic circumstances". Flexibility should be built into the wording of Policy 4 to enable other uses to be considered should circumstances change and to allow the plan to be able to provide a rapid response to changes in economic circumstances or other rapid change in an area not envisaged in the plan. On this basis, the inclusion of a criteria-based approach in Policy 4, such as that proposed for Employment Policy Areas under emerging Policy 5, would be supported. It is noted that in employment policy areas' other uses are 'supported' provided a number of criteria are met. Policy 4 (A) allocates the employment sites 'only' for B1(b/c), B2 and B8. Other uses are allowed but 'only' where they are ancillary. In order to accord with national policy and provide some flexibility in approach, we consider Policy 4 (A) could be re-worded as follows with proposed new policy wording underlined. "A) Only business (B1 b/c), general industry (B2) and storage and distribution (B8) uses will be permitted on these sites unless the proposal is ancillary to the employment use. b) The employment sites will be developed in accordance with the development requirements set out in Appendix 2 and other relevant Local Plan policies. c) For employment or other developments that propose 20+ direct jobs, the Council will seek to enter into a local labour agreement with the developer/ applicant to provide an agreed percentage target for local labour, a training and recruitment plan and a commitment to an agreed target for the proportion of local procurement of services and supplies. Under Table 4, sites to be allocated for employment uses include: - Site Ref. 1032 - Bankwood Lane, Rossington Table 4 confirms that the allocated site at Bankwood Lane comprises a
gross site area of 17.84ha which is identified as available for employment uses and is to be developed in the plan period. The Policies Map

TVI support the identification of land within their ownership at Bankwood Lane, Rossington as an 'Employment Allocation' identified below as Site Ref. 1032. (See EMAIL FOR Export of Plan) TVI support the identification of land within their ownership at Bankwood Lane, Rossington as an employment site for
B1(b/c), B2 and B8 uses under emerging Policy 4 of the Local Plan Publication Draft. The allocation of Site Ref. 1032 will contribute towards the
employment development needs of TVI and the Doncaster Borough, with Rossington identified under emerging Policy 2 as a Main Town where

Percentage criteria could hamper delivery of some projects in a very competitive market and the uncertain economic climate. On this basis we request that Criteria (C) in Policy 4 be deleted from the policy wording.
Policy 4 'Employment Allocations (Strategic Policy) Table 4 confirms that the allocated site at Bankwood Lane TVI support the identification of land within their ownership at Bankwood Lane, Rossington as an employment site for B1(b/c), B2 and B8 uses under emerging Policy 4 of the Local Plan Publication Draft. Policy 4 (A) allocates the employment sites 'only' only for B1(b/c), B2 and B8. Other uses are allowed but 'only' where they are ancillary. Flexibility should be built in to policy 4 to enable consideration of other uses. In order to accord with national policy and provide some flexibility in approach, we consider Policy 4 (A) could be re-worded as follows with proposed new policy wording underlined. "A) Only business (B1 b/c), general industry (B2) and storage and distribution (B8) uses will be permitted on these sites unless the proposal is ancillary to the employment uses (**or where an alternative use would accord with the Policy 5 criteria and other relevant policies in the Plan.**) new policy wording shown as (***) Policy 4 (C) seeks to enter into local labour agreements and agree percentages of local labour use? this could prevent a full and proper competitive tendering for new developments, limit the use of certain contractors and have adverse economic investment consequences. Policy 4 (C) should be deleted from the policy wording.

Response:
Support noted and welcomed. No change proposed to Criteria A. These sites are allocated for employment use in order to meet the job need for the borough and are protected for that purpose. No change proposed to Criteria C. The aim of local labour agreements is to ensure that local people benefit from development in the borough. The Council works closely with employers and local training providers to ensure that this happens.

CUSREF: 05198 Name: ID Planning
Date: 26/09/2019 Organisation: ID Planning
Representing: Tanks & Vessels Industries Ltd
Comment Ref: C/Site 1032 - Conclusion/05198/1/007

Attend Examination: Written Representation

Reason:
Area: Chapter 4: Strategic Approach
Policy: Policy 4: Employment Allocations

Tests of Soundness:

Comment:
The identification of land at Bankwood Lane shown as ‘Area A’ on Plan 1 for employment uses in the emerging Policy 4 of the Local Publication Draft is supported and the site is considered to comprise a sustainable employment location within an existing employment area which benefits from excellent connectivity with the wider road network. However, in order for Policy 4 to be considered sound, it is TVIs view that an element of flexibility should be afforded in Policy 4 to account for alternate uses and allow the policy to adapt to rapid change or needs not anticipated in the plan, as required by the NPPF (2019). Therefore, the Policy 4 allocation is supported subject to the proposed policy wording changes set out in our representations. This would ensure that Policy 4 is both effective and consistent with national policy and would therefore be ‘sound’. TVI consider the identification of their land identified as ‘Area B’ on the Proposals Map as an Employment Policy Area to be sound, with Policy 5 allowing for suitable flexibility in the type of uses which could be accommodated on the site. This is considered to be in line with the general thrust of the Publication Draft Policies & Site Allocations Plan and emerging Policy 2 which seeks to focus substantial housing and employment growth in Main Towns such as Rossington. We trust the above representations will be taken on board. In the meantime, should you require any further information at this stage, please do not hesitate to contact me.

Summary:
For Policy 4 to be considered sound an element of flexibility should be afforded in Policy 4 to account for alternate uses and allow the policy to adapt to rapid change or needs not anticipated in the plan, as required by the NPPF (2019). Policy 4 allocation is supported subject to the proposed policy wording changes set out in our representations. TVI consider the identification of their land on the Proposals Map as an Employment Policy Area to be sound. Policy 5 allows for flexibility in the type of uses which could be accommodated on the site

Response:
Noted. No changes are proposed to Policy 4. Employment sites are allocated for employment use in order to meet the job need for the borough and are protected for that purpose.
The following representation relates to land in our client’s ownership, the extent of which is shown on the attached plan (Plan 1). Two areas are shown including Area A to the east of Bankwood Lane and Area B at the northern end of Bankwood Lane. The site forms part of the wider Bankwood Lane Industrial Estate. Bankwood Lane forms the western edge of Area A whilst Area B is located at the northern end of Bankwood Lane. Allotment land is to the north west of Area A, while the Rossington Drain forms the northern boundary of both areas. The Great Yorkshire Way, which opened in 2016, runs approximately 590m north of the site area and the industrial estate, providing access to the M18 and providing a gateway to the wider Sheffield City Region. Land to the north of the site is within the Green Belt. The site is bound to the east by woodland and to the south by further allotments and existing residential development. The site is currently in use by TVI for existing operations including employment and distribution uses. Part of the employment area is intended for future redevelopment with the potential for further provision of jobs, economic investment and housing in this location. An outline permission (12/01107/OUTA) was granted in October 2013 for 1,200 residential dwellings and associated development on colliery land to the west of Bankwood Lane Industrial Estate. It is estimated that approximately 300 dwellings associated with the development have been delivered at present. In the vicinity of the TVI land there have been two planning applications submitted that relate to proposals for a Link Road which would connect the West End Lane Roundabout to the west with Bankwood Lane and the wider industrial estate. Full application 18/00548/FULM was submitted on behalf of Attero Developments and relates to Phase 1 of the Link Road along with proposals seeking to expand their existing on-site waste recycling operations at the industrial estate. The application was approved in November 2018. The second application (18/02114/FULM) was submitted by ID Planning on behalf of TVI and relates to the full extent of the Link Road from the West End Lane Roundabout up to the western edge of Attero’s land and the wider industrial estate. The application is pending consideration and if approved, will result in improved vehicular access to Bankwood Lane Industrial Estate from the Great Yorkshire Way and the strategic road network beyond, whilst also resulting in residential amenity benefits as it would provide an alternate route for HGV traffic which currently passes through residential development to the south and west of the industrial estate and along the southern end of Bankwood Lane. The proposal would therefore support the continued use of Bankwood Lane Industrial Estate for employment purposes while also protecting existing and future residential amenity.
Chapter 4: Strategic Approach

Policy 3 ‘Level and Distribution of Growth’ Fails to satisfactorily direct light to allow participation in discussion regarding distribution of development, site selection and allocations.

Policy 4: Employment Allocations

Harworth Group Plc

Response:

Denaby Main (site ref 1035) should be allocated for employment development and Table 4 of the Plan be amended.

Tests of Soundness:

Comment:

7. Policy 3 distributes growth for employment development to the Main Towns according to the same criteria as the Doncaster Main Urban Area. For 'light industry and manufacturing' which is stated to include 'local employment (including small scale distribution)'. the criterion is 'locations with good access to the M18/M180 motorways and strategic road network'. As the sole criterion (save for specific inclusion of the Unity site), this is not considered able to achieve development that provides for 'local employment' as intended across the Main Towns and other settlements. 9. Policy 3 should therefore be amended to include within the table (row: Main Towns, column: Light Industry & Manufacturing) a criterion to facilitate allocation of further land for employment use which is well located in relation to the existing urban area (i.e. accessible to local communities) of the Main Towns as suggested below (underlined). Policy 3 table extract: Location - Light Industry & Manufacturing: Rail and manufacturing, particularly advanced manufacturing Local employment (including small scale distribution). Low carbon and "green industries" (including renewable energy) Location: Main Towns Employment - Light Industry & Manufacturing: As Doncaster Main Urban Area. Locations within and accessible to the existing town Unity (Hatfield Power Park and associated business parks). 10. Without this amendment, the draft Plan is unsound as it does not represent an appropriate strategy to achieve the Spatial Strategy as set out in Policy 2 which seeks to focus employment development to locations accessible to the Main Towns, and support housing growth in the Main Towns by appropriate levels of employment growth. Furthermore, the Council’s site selection report (p214 see below) recognises there are 'limited employment sites in the west of the borough' which this would help remedy. 11. Accordingly, Table 4 (as referenced from Policy 4) should be amended to include the allocation of land at Conisbrough & Denaby for employment development. In particular, this is required to attract investment to the town and to create jobs additional to those already accommodated within the existing Denaby Industrial Estate (Employment Policy Area). 12. Harworth Group’s site ref 1035 which is proposed for employment development (in part) is located directly adjacent to the existing industrial estate, is readily accessible from nearby residential areas, and is accessible to the main road network (A6023 and A630). 13. Within the Council's assessment of this site (p214 of the Housing and Employment Sites Selection Methodology and Results Report June 2019), the adjacent Denaby Lane Industrial Estate is described as 'successful', yet in the same section reference is made to the Employment Land Review to state that 'the site is not particularly attractive for industrial development and that viability is an issue'. This is disputed by Harworth Group which is itself an experienced developer of industrial sites and specialist in the remediation of former coalfield sites. 14. The Council's assessment also considers the matter of Green Belt, concluding that 'there is a lack of exceptional circumstances for the allocation of this site at this time due to the availability of other sites across the borough which are not within the Green Belt'. This approach is contrary to the Spatial Strategy (Policy 2) to focus employment development to locations accessible to the Main Towns, and support housing growth in the Main Towns by appropriate levels of employment growth. 15. To achieve the spatial strategy, it is essential that land is allocated for employment development at Main Towns in the west of the borough, and if this requires the reallocation of land in the Green Belt, then that needs to be done by this Plan. 16. The Council’s assessment of the site makes reference to the Green Belt Review and indicates that the site has 'boundaries of mixed strength' and is "Moderately Performing against Green Belt purposes'. The relative assessment of sites in the Green Belt at Conisbrough & Denaby is discussed further below, but our conclusion is that Harworth Group’s site ref 1035 presents a stronger case for removal from the Green Belt than the site proposed to be removed (and that currently allocated but functioning as Green Belt). 17. Accordingly, to accommodate such an allocation, the settlement boundary on the proposals map must be changed with a corresponding removal of land from the Green Belt. 4.2 ha of land at Eland Road, Denaby Main (site ref 1035) should be allocated for employment development and Table 4 of the Plan be amended as set out at the conclusion of these representations.

Summary:

Re Policies and Site 1035 (Hill Top Denaby - Rejected Housing Site) Policy 3 ‘Level and Distribution of Growth’. Fails to satisfactorily direct light industrial, manufacturing and small scale distribution to the Main Towns, and in particular those in the west of the borough. The settlement boundary on the proposals map must be changed with a corresponding removal of land from the Green Belt. 4.2 ha of land at Eland Road, Denaby Main (site ref 1035) should be allocated for employment development and Table 4 of the Plan be amended.

Response:

The Housing and Employment Site Selection and Result Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The Green Belt Topic Paper explains why there are no employment allocations within the Green Belt at this time i.e. it is considered that there are currently no exceptional circumstances. The explanatory text of Local Plan Policy 3 also explains that there is access to business parks across the border in Rotherham. These can be accessed using strong public transport links and road connectivity.
Please see attached statement which provides full explanation and justification for Harworth Group’s objection to the Publication Version Local Plan in relation to Conisbrough & Denaby, which comprises the following points: 2. Policy 4 and the associated Table 4 fail to allocate any land for employment development in the Main Town of Conisbrough & Denaby. Given the above, it is considered that Publication Draft Local Plan does not meet the tests of soundness insofar as it must be justified on the basis of evidence and represent an appropriate strategy when considered against other reasonable alternatives. A ‘reasonable alternative’ which represents a more sustainable and preferable form of development is put forward by Harworth Group and described in the attached statement. Suggested changes to the Plan that are required to achieve this preferable ‘reasonable alternative’ are summarised below. PROPOSED CHANGE Please see attached statement which provides full explanation and justification for Harworth Group’s suggested changes to the Publication Version Local Plan in relation to Conisbrough & Denaby which are summarised below. These changes are required to ensure that the Plan is justified on the basis of evidence and represent an appropriate strategy when considered against other reasonable alternatives. Policy 3 should be amended to include within the table a criterion to facilitate allocation of further land for employment use which is well located in relation to the existing urban area of the Main Towns, as follows: Location: Employment - Light Industry & Manufacturing; Rail and manufacturing, particularly advanced manufacturing Local employment (including small scale distribution). Low carbon and "green industries" (including renewable energy). Location: Main Towns Employment - Light Industry & Manufacturing: As Doncaster Main Urban Area. Locations within and accessible to the existing town Unity (Hatfield Power Park and associated business parks) Table 4 (as referenced from Policy 4) should be amended to include the allocation of land at Conisbrough & Denaby for employment development as follows: Table 4: Employment Site Allocations Ref: 001 Address/ Location: Junction 6 M18, Thorne North Gross site area (Ha): 73.63 Area available for employment use (ha): 73.63 Ha to be developed in plan period: 51.54 Ref: 092 Address/ Location: Balby Carr Gross site area (Ha): 11.25 Area available for employment use (ha): 11.25 Ha to be developed in plan period: 8.60 Ref: 258 Address/ Location: Site 1, Middle Bank, Balby Gross site area (Ha): 8.48 Area available for employment use (ha): 5.00 Ha to be developed in plan period: 5.00 Ref: 441 Address/ Location: Land at Carcroft Common, Carcroft Gross site area (Ha): 49.28 Area available for employment use (ha): 24.64 Ha to be developed in plan period: 12.32 Ref: 941 Address/ Location: RHADS Site 1, Phase 4 Business Park Gross site area (Ha): 68.54 Area available for employment use (ha): 68.54 Ha to be developed in plan period: 68.54 Ref: 1032 Address/ Location: Bankwood Lane, Rossington Gross site area (Ha): 17.68 Area available for employment use (ha): 17.68 Ha to be developed in plan period: 17.68 Ref: 1035 Address/ Location: Land at Eland Road, Denaby Main Gross site area (Ha): 4.2 Area available for employment use (ha): 4.2 Ha to be developed in plan period: 4.2 [Plus other sites as appropriate] The following changes should be made to the site allocations and land designations as shown on the Policies Map: Site 1035 should be removed from Green Belt and allocated for employment (in part - 4.2 ha) and housing development (in part - 7.3 ha) with the settlement boundary adjusted to suit. Development of this site would deliver c.7,000 sqm of employment space and up to approximately 200 houses. Site 383 (in its current form) should be deallocated for housing and instead designated as Green Belt; open space, sports and recreation; and as a local wildlife site. Site 040 (in its current form) should be omitted as a housing allocation of land at Conisbrough & Denaby. To fully meet local housing need, the Council should consider identifying further land at Conisbrough & Denaby for housing which may be in the form of a reduced extent of site 040 and/or 383 (i.e. that preserves the biodiversity/amenity function and limits green belt incursion) or other suitable site. Accordingly, Table H2(D) of the Publication Version Local Plan should be amended as follows: Table H2(D): Allocations without planning permission (as at 1st April 2018): (SITE 040 AND 383 SHOWN AS STRIKE THROUGH BUT CANNOT BE SHOWN) Site Ref: 1035 Address: Land off Hill Top Road, Denaby Main Site Area (Ha): 7.3 Indicative Capacity (No of houses): 200 Achievability (deliverable & developable) - 0-5 Yrs: 0 5-10 Yrs: 200 11-15 Yrs: 0 15-17 Yrs: 0 Beyond Plan Period: 0 Site Ref: Address: [Reduced extent of site 040 or 383 or other suitable site] Site Area (Ha): Indicative Capacity (No of houses): 125 Achievability (deliverable & developable) - 0-5 Yrs: 0 5-10 Yrs: 0 11-15 Yrs: 125 15-17 Yrs: 0 Beyond Plan Period: 0 TOTALS: Indicative Capacity (No of houses): 325 Achievability (deliverable & developable) - 0-5 Yrs: 0 5-10 Yrs: 200 11-15 Yrs: 125 15-17 Yrs: 0 Beyond Plan Period: 0

Summary:

Policy 4 and the associated Table 4  1. Fails to allocate any land for employment development in the Main Town of Conisbrough & Denaby. 2. Site 1035 should be included as an Employment allocation (part and Housing (part) 3. Site 383 (allocated site) - should be Green Belt/Open space/Sports and recreation/local wildlife site. 4. Site 040 (allocated site)-should be retained as Green Belt. 5. To meet housing need further sites should be allocated at Conisbrough and Denaby.
As set out in the ELNA, Colliers report and Green Belt Topic Paper, there is no requirement to locate new employment in this location, and no exceptional circumstances for removing land from the Green Belt here to facilitate employment sites. 1035 is not as preferable as 040 in Green Belt terms (see Green Belt Review), and there are access reservations. Site 383 is not currently Green Belt, there is no reason or exceptional circumstances to amend the Green Belt to incorporate this site, which is available and deliverable for housing. The Green Belt Topic Paper looks at Green Belt in this location more thoroughly. Based on the sites allocated, Conisbrough can get within its housing range without allocating further sites.

Comment Ref: /Site 001/05260/1/001
Name: Andrew Howard
Date: 29/09/2019
Organisation: 
Representing: 

Comment Ref: /Site 001/05260/1/001
Attend Examination: Not Stated
Reason: 
Area: Chapter 4: Strategic Approach
Policy: Policy 4: Employment Allocations
Tests of Soundness: 

I wish to object to the proposed building of warehouses at Junction 6 of the M18 motorway known as Site 001. As a resident of Lyndhurst Close, over the years I have watched more and more fields in this once quiet and peaceful area be slowly consumed by developers building warehousing, industrial units and retail parks, bringing vehicle noise, pollution and airborne dirt. The size of the proposed area to be dug up and concreted over for speculative warehousing is obscene. I understand the area to be technically a floodplain, is currently productive agricultural land and will no doubt be home to wildlife already displaced by the building of Capitol Park and the "inappropriate-to-the-area-sized" warehousing for The Range stores. There are plenty of sites next to the M18 motorway further towards the M1 with seemingly superior vehicular access and importantly away from residential areas. I implore the planning decision makers at Doncaster Council not to bow to the opportunistic developers and their carefully crafted sales pitch and side with the poor residents that have to live with the fallout of these decisions to allow building to take place.

Summary:
Object to warehousing. Area consumed by developers building warehousing, industrial units and retail parks, bringing vehicle noise, pollution and airborne dirt. Area is floodplain and agricultural land. Other sites near M18 with better access away from residential area

Response:
Noted. The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites.
Comment: I object to Site 001 Thorne North Junction 6 M18 proposed as Employment Land. Site 001 is Flood Zone 3, it is 182 acres of floodplain, it is approximately 80m from the River Don, with climate change more areas are flooding, we need our floodplains. DMBC Air Pollution Control Officer does not support development on this land, increased traffic will worsen already poor air pollution in this area if developed. The whole area is part of the Humberhead Levels, it will have a devastating impact on all wildlife including protected species that live and hunt on it. Loss of high quality Grade 3 - "very good" agricultural land, we need this land to grow food. A vast area of countryside would be lost, replaced by gigantic ugly sheds on the approach to Thorne. The land lies outside the urban frame, it is the wrong side of the motorway, it is not a sustainable urban extension. No safe pedestrian/ cycle routes can be identified to Site 001. We have enough warehouses in Thorne we do not need anymore. It is most definitely not a specific site identified for employment by the local community in the Neighbourhood Plan.

Summary: Object to site 001: Development is in Flood Zone 3 and on a floodplain, close to the River Don. Climate change means flood plains are needed. DMBC pollution control officer does not support development here and increased traffic will worsen air quality. The site is part of the Humberhead Levels and will have a devastating impact on wildlife which use the site. Site is Grade 3 agricultural land needed to grow food on. A vast area of countryside would be lost and replaced by ugly sheds. The site is outside of the urban frame and on the wrong side of the motorway, and is not a sustainable extension. There are no safe pedestrian or cycle routes. Thorne does not need anymore warehouses. The site is not identified as employment land in the Neighbourhood Plan.

Response: The comments against the allocation of Site 001 are noted.
I write as landowner as part of the allocation for employment land in the Doncaster Local Plan, which is currently subject to public consultation. I am aware that the Publication Draft of the Local Plan is proposing to allocate the site for employment use (under site reference 001) and am in full support of the allocation. I am in active discussions with the other landholders of the site and Barmston Thorne Limited regarding the delivery of the site and am a willing seller of my land for its development for employment use under the proposed allocation.

Summary:
I am a landowner of part of the allocation for Site 001 (Thorne North) and am aware it is proposed for employment. I am in full support of the allocation and am in active discussions with other landowners and Barmston Thorne Ltd regarding the delivery of the site. I am a willing seller of my land for its development for employment use.

Response:
Comments in support of the proposed allocation of Site 001 (Thorne North) are noted. The willingness to sell is also noted.
Test of Soundness:

Comment:

This letter comprises a response to the Doncaster Local Plan: Publication Draft (June 2019). I own and control part of the site that is allocated for employment use as site 001: Junction 6 M18, Thorne North within the Publication Draft of the Doncaster Local Plan. I fully support this allocation and the associated development of 73.63 ha of employment land and are actively engaged with Barmston Thorne Limited regarding the delivery of the site for employment uses. I am not aware of any technical or land ownership issues that would prevent delivery of the site for employment use. I welcome Barmston's involvement in the development of this site, for which they have a strong track record of delivery in the local area. I would be grateful if my comments could be passed to the Inspector and my support for employment allocation 001 as a key controller of the land taken into consideration in the progression of the plan.

Summary:

I own and control part of Thorne North (ref 001) and fully support this allocation and the associated development. I am actively engaged with Barmston Thorne Ltd regarding the delivery of the site. I am not aware of any technical or land ownership issues that would prevent the delivery of the site. I welcome the involvement of Barmston and they have a strong track record of delivery.

Response:

Comments in support of the proposed allocation of Site 001 (Thorne North) are noted.
3.1. The site has no specific planning history but there are applications on the adjoining site which are relevant in respect of the link between the two elements. 3.2. The following list of applications relates to the site immediately to the south and west of the subject site. - 87/0886/P - Change of use of land including the erection of single storey steel framed building 33.0m x 11.7m) for shot blasting and paint spraying business on approx. 1.0 ha of land (granted) - 91/2489/P - Outline application for industrial development on approx 1.1 ha of land (Allowed on appeal) - 94/0101/P - Use of land for motor cycle training on approx 1.9 ha of land (Approved) - 97/0112/P - Use of approx 2.2 ha of land as scrapyard (Allowed on appeal) - 97/3510/P - Change of use of premises to waste transfer station (Approved) - 99/3311/P - Excavation, screening and removal of ash for recycling (Approved) - 06/01956/FUL - Erection of industrial unit 36.5m x 13.7m and formation of new access road (Approved) - 09/00190/OUTA - Construction of an inland port (Strategic Rail Freight Interchange) together with ancillary infrastructure and operational development (Approved and implemented) - 16/02386/COUM - Temporary change of use from former factory and factory outlet to HGV parking for a period of 18 months - 18/00548/FULM - Provision of new link road, change of use of land to waste recycling area, erection of waste management buildings and provision of rail loading and HGV parking area.

Summary:
Site planning history. Comments noted.

Response:
Noted.
The Site

2.1 The site is located at the north end of the Bankwood Lane Industrial Estate (Bankwood Estate). The Bankwood Estate lies to the north of New Rossington, approximately 5km to the southeast of Doncaster. To the west of the site, the former Colliery site is currently undergoing a significant, mixed-use redevelopment of housing, employment and leisure uses linked from Great Yorkshire Way (A6162), which in turn allows access to Junction 3 of the M18. 2.2 To the north and east is a railway line, allotments, the A6182 and agricultural land. 2.3 ECO POWER ENVIRONMENTAL LTD operates a waste transfer station in part of the application site. Waste materials are imported to the site by HGV and undergo a range of processes including sorting, separation, screening, bailing, shredding, crushing, blending and compaction, prior to being exported from the site by road and rail. In addition, Attero have been processing historical waste material on the site. 2.4 Directly to the south of the Site is a small brook (Rossington Drain). Two sets of pylons run through the site; a small 11kv running north/south and a much larger 132kv line running east/west. South of the Rossington Drain are a number of allotments and the Bankwood Lane Industrial Estate. The Estate is principally made up of industrial and small waste related uses. Further south is the large residential area of Rossington.

Summary:

Sets out the site location and local context. Comments noted.

Response:

Noted.
Comment: It is important to be able to present to the Inspector the significant operational and environmental benefits that the proposed allocation would create.

Area: Chapter 4: Strategic Approach

Policy: Policy 4: Employment Allocations

8.1. The location of this site, with a direct link to the ECML and the strategic road network lends itself to providing a multi modal rail terminal. 8.2. The Green Belt Assessment undertaken by the Council as part of the Local Plan evidence base demonstrates that the site does not meet the requirements of Green Belt as set out in NPPF and performs poorly. 8.3. The application site is in a perfect location for a multi modal rail terminal as set out in the representations meets all of the criteria that would be looked at for such an important strategic 8.4. There is demand for 400,000 tonnes of material per year to move between Rossington and Roxby. 8.5. There is demand for 100,000 tonnes of aggregates from Doncaster to various rail connected locations. Eco-Railfreight has been established to support the Waste and Aggregates industry to access Rail Freight logistics at competitive prices and is Doncaster based. 8.6. The expansion of Rossington to a Multi-Modal Railfreight Terminal has the potential to remove 26,000 truck moves from Doncaster’s roads as well as 1047 tonnes of CO2 emissions 8.7. The project will create additional employment opportunities for Doncaster and surrounding areas 8.8. It is therefore requested that the current Local Plan Proposals Map is amended to include the allocation of the site for use as a multi modal rail terminal.

Response: The proposed sites allocations are set out in the Local Plan and shown on the proposals map. The reasons for sites being allocated or not are detailed in the 'Site Selection Methodology' in the evidence base. The site in question is in the Green belt and the Green Belt Topic Paper explains why there are no employment allocations within the Green Belt at this time i.e. it is considered that there are currently no exceptional circumstances.
5.1 The site is currently proposed to remain in the Green Belt. The owner has made previous representations to remove the site from the Green Belt for alternative uses. As part of the Local Plan Evidence Base, the Council undertook a Green Belt Review, the findings of which were published in February 2016. 5.2 The first stage of the review was to identify 'general areas' for assessment. These areas were defined based on permanent and defensible 'strategic' boundary features, such as motorways and A roads, operational railway lines, strategic waterbodies etc. Each of the general areas were assessed against the Local Interpretation of the five purposes of the Green Belt. 5.3 For each purpose of the Green Belt, a number of criteria were developed against which to appraise the areas. A score out of five was offered to each purpose, 5 represented a general area that was strongly fulfilling the purposes of the Green Belt and 1 represented a general area that was weakly fulfilling the purpose of the Green Belt. 5.4 The five purposes are set out below: 1. To check the unrestricted sprawl of large built-up areas; 2. To prevent neighbouring towns from merging into one another; 3. To assist in safeguarding the countryside from encroachment; 4. To preserve the setting and special character of historic towns; and 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. 5.5 Stage 2 of the Green Belt assessment applied site selection criteria to promoted Green Belt sites to determine which are considered to otherwise be unconstrained or developable. 5.6 The Stage 3 Green Belt Review looks at the implications of removing specific sites form the Green Belt to accommodate residential or employment development. As the Nomination Site was not put forward for potential allocation previously, the Site has not been assessed at Stages 2 or 3 of the Review. 5.7 The Site forms part of the wider general area 'South 7'. The wider site scores generally very low against the majority of Green Belt purposes. It scores 1 for purposes one, two and four, 2 for purposes three and it scores 4 for purposes five. 5.8 Based on this assessment it is clear that the site does not fulfil the purposes of Green Belt as set out in Paragraph 134 of the NPPF.
Comment Ref: C/Introduction: Bankwood/05277/1/001

Attend Examination: Attend Hearing

Reason: It is important to be able to present to the Inspector the significant operational and environmental benefits that the proposed allocation would create.

Area: Chapter 4: Strategic Approach

Policy: Policy 4: Employment Allocations

Tests of Soundness: Positively prepared

Justified Consistent with national

Comment:

1.1. This Statement has been prepared by Broadgrove Planning and Development Limited on behalf of ECO POWER ENVIRONMENTAL LTD in response to the Doncaster Local Plan Publication Draft 2019. 1.2. The representations relate to the promotion of land owned by ECO POWER ENVIRONMENTAL LTD which is adjacent to their existing operations on the established Bankwood Lane employment area. 1.3. A copy of the location plan is attached at Appendix 1. (SEE EMAIL FOR Appendix 1) Structure of the Representations 1.4. These representations set out the context of the site, outline the proposals and the benefits of the proposed allocation. 1.5. This statement comprise; - Chapter 2, Site and Surrounding Area: explains the site composition and its context; - Chapter 3, Planning History: discusses any relevant planning history; - Chapter 4, Proposal: provides details of the proposals; - Chapter 5, Planning Policy: provides the planning policy context and justification for the proposals; - Chapter 6, Material Considerations: discusses relevant material considerations to be weighed in the balance of the allocation; - Chapter 7, Planning Considerations: provides an assessment of the proposals compliance with planning policy balanced against the relevant material considerations; - Chapter 8, Conclusions: summarises the contents of this statement and confirms the acceptability and significant merits of the proposed development and its allocation.

Summary:

Site ref 1016 North of Bankwood Lane Rossington (rejected Employment site). Promoting site North of Bankwood Lane Industrial Estate for a 'rail head and loading facility'. Wants local plan amended to include this site as a 'multi modal rail terminal'. Site is currently in the Green Belt and disputes Green Belt review findings. Site is part of 'South 7' in the GB review that generally scores very low against purposes of GB. Sets out a case for the benefits of allocating the site. o Perfect Location o Demand o Sustainable transport o Jobs

Response:

The Green Belt Topic Paper explains why there are no employment allocations within the Green Belt at this time i.e. it is considered that there are currently no exceptional circumstances. The explanatory text of Local Plan Policy 3 also explains that there is access to business parks across the border in Rotherham. These can be accessed using strong public transport links and road connectivity.
6.1. The use of the site for a rail head would meet a number of objectives of the National Planning Policy Framework (NPPF) and need to be considered against any potential impact on the Green Belt. National Planning Policy Framework. 6.2. The National Planning Policy Framework (NPPF) 2019 provides national policy to guide development plan preparation and planning application decision making. The most relevant elements of the NPPF for the proposed development are briefly summarised below. 6.3. Paragraph 8 states that there are three dimensions to sustainable development: economic, social and environmental and, as set out in paragraph 9, these provide broad objectives to be delivered through planning decisions. 6.4. At the heart of the NPPF is a presumption in favour of sustainable development as set out in paragraph 11. This means that local planning authorities should “approve development proposals that accord with the development plan without delay and where the development plan is absent, silent or relevant policies are out-of-date, grant permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits”. 6.5. Paragraph 102 states that Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: a) the potential impacts of development on transport networks can be addressed; b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised - for example in relation to the scale, location or density of development that can be accommodated; c) opportunities to promote walking, cycling and public transport use are identified and pursued; d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account - including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places. 6.6. Paragraph 103 of the NPPF continues, that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.

Summary:
The proposal and the NPPF. The use of the site for a rail head would meet a number of objectives of the National Planning Policy Framework (NPPF) and need to be considered against any potential impact on the Green Belt.

Response:
Comments noted. Any Planning Application would deal with site specific issues such as this.
7.1. The use of this land for a rail head has a number of benefits that should be considered as part of the evidence base in positively preparing the Doncaster Local Plan. This section of the representations set out the benefits of rail freight generally, as well as the specific benefits of the Rossington proposals. Design / Layout / Character and Appearance 7.2. The site, albeit in the Green Belt is within an established industrial area and other large scale allocations. The Site currently comprises 5.3ha of presently unused and vacant land, is located at the northern end of Bankwood Lane adjacent to, and directly to the east of, a large waste recycling and bulking facility operated and owned by Attero. 7.3. It has been demonstrated that the site does not contribute to the 5 purposes of Green Belt and the following will set out the further benefits that should be considered in allocating this site for a new multi modal rail terminal. 7.4. Previous representations on this site were for employment purposes and involved built development which would have resulted in more substantial buildings than the current proposals for a multi modal rail terminal. 7.5. It is important that the site is reassessed in this context to ensure that the Local Plan is considered sound having considered the most up to date information and evidence. In respect of this site this position has changed and this fundamentally shifts the way that the Council would have assessed this site in earlier versions of the Local Plan. Benefits of Railfreight 7.6. Rail freight has a number of benefits that should be considered and add weight to the allocation of this site. 7.7. Given the sites proximity to the East Coast Main Line (ECML) and the strategic road network the opportunity to create a multi modal rail terminal should be explored. The fact that the landowner has specific requirements and there are substantial demands for large volumes of material to be moved locally by rail enhances the weight that should be attached to such a proposal. 7.8. In addition to the traditional bulk cargoes, rail is well placed to provide long-haul consumer services; this sector has seen a steady 30% growth in the past 10 years with an increase of 5% last year. The industry predicts that rail freight will have doubled by 2030 with consumer traffic growing fourfold. 7.9. There have been numerous studies which have analysed the benefits of transferring freight from road to rail. These benefits are assessed below and include; - Environmental - Economic - Safety and Road congestion Environmental benefits Air Quality 7.10. Transport is the only sector which grew between 2012 and 2017 and is responsible for 28 per cent of overall UK carbon dioxide emissions. In 2017, HGVs were responsible for 17 per cent of emissions whilst only accounting for five per cent of miles driven. The CCC stated that the Department for Transport (DFT) Freight Carbon Review identified 'little concrete action' and that the Government should reduce emissions from freight by shifting freight from road to road. 7.11. Transferring more freight from road to rail, where there is pent-up demand on certain key routes, should be part of the solution as every tonne carried by rail instead of HGVs, reduces carbon dioxide emissions by 76 per cent. HGV engine efficiency has not improved in recent years; CO2 intensity increased by 2.2 per cent due entirely to decreased fleet efficiency in 2017. It is also reduce rail freight's effect on congestion, and rail is well placed to offer a safer, cleaner long-distance alternative which reduces road congestion for both consumer traffic as well as the traditional bulk cargoes. 7.12. Rail is well placed to carry out the longer distance alternative which reduces road congestion for both consumer traffic as well as the traditional bulk cargoes. 7.13. The expansion of Rossington to a multi modal railfreight terminal has the potential to remove 26,000 truck movements from Doncaster's roads as well as 1047 tonnes of CO2 emissions. Economic benefits 7.13. The geographic pattern of rail freight benefits is supporting a more balanced economy for Britain. More than 60% of its activity is focussed in former industrial heartlands in Yorkshire and Humber, the North West, Scotland and the Midlands and overall, more than 87% is outside of London and the South East. 7.14 A 2018 report by KPMG "Rail freight in GB : Productivity and other economic benefits" set out the aggregate productivity and economic benefits to the UK. This demonstrated that in 2016 rail freight secured over #1.7 billion of economic benefits for Britain. 7.15 The KPMG report broke the economic benefits down by region and showed an estimate of #324 million of total economic benefits. Safety and Road congestion 7.16 Supporting rail freight growth will tackle rising levels of congestion on the UK's roads, particularly important in areas of acute congestion like the Midlands. Each freight train removes up to 76 heavy goods vehicles (HGVs) from Britain's roads. The rail freight operators transport goods that would otherwise require 7.79 million HGV journeys each year, resulting in 1.66 billion fewer HGV kilometres every year. 7.17 The accruing externality benefits, largely through lower road congestion, were worth over #0.5bn in 2016. Rail freight could play a greater part in tackling congestion across many of the key road corridors, helping to boost local economies and improve quality of life. Research by consultants from MTRU on behalf of the Campaign for Better Transport and the Department for Transport, identifies opportunities for targeted upgrades of existing rail lines to enable large numbers of lorry loads to be transferred to rail. 7.18 The resulting modal shift would have a considerable, positive impact on congestion on these key road corridors. The study highlights the need to holistically consider cross-modal interventions on a corridor-by-corridor basis when evaluating options to reduce congestion. 7.19 These specific proposals would remove 26,000 truck movements from Doncaster's roads. Limited site opportunities 7.20 There are specific requirements for a site to meet all of the relevant criteria to ensure that they are effective multi modal rail terminals. This makes finding an appropriate site extremely difficult and limits the types of locations that should be allocated for such a use. 7.20 To be effective, interchange terminals must be capable of meeting the following criteria: - Be on or close to an existing railway line - Have good road access suitable for HGVs - full-size lorries need to be able to serve railheads safely and with minimal impact on other road users. - Be of sufficient size - today's freight trains are often over 500 metres in length, modern handling methods safe working areas and value-adding activity (storage, processing, re-packing) need space. - Be capable of 24 hour operation - a requirement of many customers, which often means that activity at railheads must be able to take place outside these times. Residential property in the vicinity should be designed so that sleep is not disturbed.
7.21 While some of the above seem obvious, it is very difficult to find sites that meet all of the above criteria without some form of constraint.

This site meets all of the above with no detrimental impacts or constraints to development. 7.22 As such, the site should be allocated as a multi modal rail terminal in the Local Plan to ensure that there is sufficient comfort to invest in such a proposal and enable the significant benefits of the proposal to be brought forward.

Summary:
Sets out the benefits of rail freight generally, as well as the specific benefits of the Rossington proposals.

Response:
Noted.

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<td>Date: 30/09/2019</td>
<td>Organisation: Broadgrove Planning and Development LTD</td>
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<td>Representing: Eco Power Environmental Ltd</td>
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4.1. The owner is seeking the allocation of the site for a new rail head and loading facility. 4.2 The site has the potential to create additional employment opportunities and the plan attached at Appendix 2 demonstrates how the site could be brought forward as a multi modal rail terminal. (SEE EMAIL FOR Appendix 2) 4.3 Doncaster is a logistics hub for many flows of traffic heading North or South for consumers or East toward the Humber Ports. Much of this traffic could be converted to rail freight services but lacks the access to a Bulk loading facility or modal shift interchange. 4.4 In Doncaster there are two existing rail terminals:
- Doncaster Rail Port (Intermodal Containers)
- Doncaster iPort (Intermodal Containers) None of the existing sites cater for Bulk products such as Aggregates, Waste products such as RDF and SRF (using in energy production), Timber and Ash. The plan at Rossington is to develop a terminal capable of handling all these 'bulk' products and transferring from road to rail. 4.5 The proposals are responding to site characteristics and local demand for such a facility. There is demand for 400,000 tonnes of material per year to move between Rossington and Roxby and there is demand for 100,000 tonnes of aggregates from Doncaster to various rail connected locations. 4.6 Eco-Railfreight has been established to support the Waste and Aggregates industry to access Rail Freight logistics at competitive prices and is Doncaster based. The expansion of Rossington to a Multi-Modal Railfreight Terminal has the potential to remove 26,000 truck moves from Doncaster’s roads as well as 1047 tonnes of CO2 emissions. 4.7 The project will create up to 400 additional good paying jobs for Doncaster and surrounding areas.

Summary:
Summary of potential new jobs the site could bring forward.

Response:
Noted.
HLM/HBD object to Policy 4 on the basis that it fails to allocate sufficient land to achieve the overall employment target of at least 481ha. A significant concern is the effectiveness of the policy to deliver at least 481ha of employment land. The Plan proposes a total of 482ha of land which comprises Land developed 2015-2018 (117ha); Sites with Planning Permission (201ha); and Allocated Sites (164ha). There appears no buffer of supply to ensure that the minimum target is met and therefore the Plan is reliant on every site being developed to achieve the requirement of Policy 3. This is unrealistic and the Plan should be providing a buffer to provide choice and competition for the market. Policy 4 is therefore not justified as an appropriate strategy, nor is it effective. PROPOSED CHANGE We have identified that there is an inadequate number of employment sites to deliver the minimum requirement of 481ha set out in the Plan. To help address this matter HLM/HBD promotes site P2-S on the enclosed masterplan, which sits to the north of Adwick and Woodlands and close to the A1 junction. The predominant parcel of land within this promotion is site P4 which is identified as Ref: 461 ‘Redhouse Lane (a) North in the Council’s evidence base. This total land of P2-S comprises 18.2ha and based on a formula of 40% of the gross site area, is anticipated to be capable of delivering in the region of 73,000m² (58,000m² on P4) of gross external area floor space. The sites are within the Green Belt. It is noted that the Green Belt Topic Paper has identified (paragraph 2.6.13) that there are not exceptional circumstances to warrant the release of land (p4/Ref: 461) in the Green Belt for employment purposes. This is on the basis that the Council considers that the Plan delivers a good spread of sites including non-Green Belt allocations in the north. However, the Plan fails to provide any level of buffer for the delivery of the Plan’s requirement and as such further allocations are required and justified. Site 461 is identified within the Green Belt Topic Paper as having a ‘moderately weak’ case for inclusion in further site selection work. However, this is very much a conclusion informed by taking the site in isolation (P2, Appendix 1: Assessment Summary, Green Belt Review Stage 3 Part 1), whereby it would be divorced from the main urban area of Adwick & Woodlands and separated by the land to the south of the A638. However, Site S13 also forms part of HLM/HBDs promotion, largely for residential purposes but also a proportion of employment land as shown on the sketch capacity plan (Parcel P5) appended to these representations. The merits of the residential allocation are discussed under our suggested amendments to Policy 6 but the key principle is that a wider allocation encompassing P2-P6 (P6 would also be housing) would represent a logical sustainable urban extension to Adwick and Woodlands and if treated as a whole would leave a clear, defensible future Green Belt boundary in the form of the railway line to the north and the A1 to the west. As identified by the enclosed Plan some of the peripheral northern areas of the P2-P6 are within Flood Zones and these would be exempt from development, forming part of a northern green buffer that would provide an attractive edge to development. The site is strategically located immediately adjacent to junction 38 of the A1 and with established employment development, largely warehouse and distribution, to the south of the site and to the east of the A1. It is recognised that the Plan has raised concerns regarding capacity issues of the A1 but equally there is clearly longer term ambition to assist with the regeneration of the north of the Borough (paragraph 4.58 of the Plan), including through the strategic linking of the A1 and the A19. Paragraph 4.58 identifies that a mixture of private and public investment will be needed in the long term to improve accessibility to new potential employment areas and to mitigate flood risks and HLM/HBD’s land, particularly Parcel 4 is well placed to assist with this and delivering regeneration in this part of the Borough. In short, site P2-S is the exact opportunity to kickstart delivery of employment land in the north of the Borough. The delivery constraints of Carcroft are well known and identified in the Plan and whilst the Plan makes positive noises about growth opportunities and regeneration in the northern communities, the Plan does not provide a vehicle for delivering these ambitions. The appointment of HBD as development partner for the employment element of the land promotion is significant, possessing a wide and varied portfolio and with an extensive track record of delivering innovative high quality development and assisting regeneration. Allied to an extremely attractive position adjacent to the A1, the site is highly marketable and HBD bring the expertise to realise the ambitions for the north of the Borough. We would recommend Parcel P4 and the northern tip of Parcel P5 is allocated for employment development to assist in increasing the total amount of employment allocation in the Borough to enable the Council to meet its employment delivery target (ie: assist in providing a suitable buffer). Parcels P2 and P3 are much smaller areas of land but would logically also be removed from the Green Belt and form part of any allocation.

Summary:

Object to Policy 4 as it fails to allocate sufficient land to achieve the employment target of 481ha. Significant concern about the effectiveness of the policy to deliver 481ha of employment land. There is no buffer to ensure the minimum target is met, and therefore the plan relies on every site being developed to achieve the requirement of Policy 3. This is unrealistic, and a buffer should be planned for to provide more choice and market competition. Policy 4 is not justified as an appropriate strategy, nor is it effective. Proposed change: There are not enough sites to deliver 481ha. To address this, a site is proposed close to Adwick - Woodlands (Generally site 461). Site is 18.2ha and can deliver 73,000m² (58,000m² on P4) of gross external area floor space. The Council have not allocated 461 on the basis of no exceptional circumstances and sufficient land, however no buffer has been identified and further sites are required. Green Belt Review assesses the site in isolation, however if the residential site to the south (513) is also allocated for housing and some employment (which this rep also promotes), it would represent a logical sustainable urban extension, and if treated as a whole would leave a clear defensible Green Belt boundary (railway line and A1). The areas which are in flood zone would be exempt from development and form a green buffer. The site is strategically located next to J38 of the A1 and with existing employment development to the south of the site and east of the A1. Accept there are capacity issues on the A1 but there is also a
The site adjoins the main Broomhouse Lane Industrial Estate site but is excluded from the allocation. The southern boundary is formed by Broomhouse Lane, Lords Head Lane form the eastern boundary. The existing Broomhouse Lane industrial estate forms the northern and western boundaries. 5.18 The land to the east of Lords Head Lane was allocated for employment use in the Doncaster UDP. The site, reference 646, comprises 17.6 ha and has outline permission for housing development. The site is included as a housing allocation with planning permission in the emerging plan. 5.19 Th site is referred to as Warmsworth Plantation on the emerging proposals map and is allocated as a candidate wildlife site. The area is wooded and a Tree Preservation Order covers the site (1986). 5.20 Policies 31, 32 and 33 of the emerging plan refer to Biodiversity and Geodiversity, Local Wildlife Sites and Woodland and hedgerows. The policies seek to protect existing features and avoid significant adverse impact. Paragraph 10.47 of the Plan states that proposals that result in the loss of woodland will not be supported unless the need for and benefits of the development at that location clearly outweigh the loss. 5.21 Paragraph 174 of NPPF states that plans should protect and enhance biodiversity and geodiversity through the identification of local wildlife rich habitats. Paragraph 175 refers to determining planning applications and states that harm to biodiversity should be adequately mitigated. 5.22 Whilst the biodiversity of the site is recognised it is considered the need for additional land for employment use provides a number of benefits to the local community and wider area that outweigh the loss of the biodiversity. 5.23 It is considered that the site should be allocated for employment to enable the expansion of the existing occupier of Broomhouse Lane Industrial Estate (Polypipe) to expand and modernise to ensure the industry remains in the area where it provides significant local employment opportunities. 5.24 The allocation of the site would make the plan sound by providing an employment allocation in the west of the Borough to provide flexibility to a main employer of the Borough in accordance with the vision for the Plan. (THIS REP IS FOR ONE SITE - FOR OTHER SITE SEE REP 05311)

Site 1 - Land to the north east of the existing Broomhouse Lane Employment Site. Site adjoins the main Broomhouse Lane Industrial Estate site but is excluded from the allocation. Land to the east of Lords Head Lane was allocated for employment use in the Doncaster UDP. The site is referred to as Warmsworth Plantation on the emerging proposals map and is allocated as a candidate wildlife site. The area is wooded and a Tree Preservation Order covers the site (1986). Paragraph 174 of NPPF states that plans should protect and enhance biodiversity and geodiversity through the identification of local wildlife rich habitats and land is allocated as a local wildlife site. Recognise biodiversity need but the need for additional employment land provides a number of benefits to the local community and wider area that outweigh the loss of the biodiversity. The site should be allocated for employment for the occupier to expand. Allocating the site would make the plan sound by providing an employment allocation in the west of the Borough to provide flexibility to a main employer of the Borough in accordance with the vision for the Plan.

Response:

The Green Belt Topic Paper explains why there are no employment allocations within the Green Belt at this time i.e. it is considered that there are currently no exceptional circumstances. The explanatory text of Local Plan Policy 3 also explains that there is access to business parks across the border in Rotherham. These can be accessed using strong public transport links and road connectivity.
Summary of Policy 4 Employment Allocations 4.73 Policy 4 allocates land for employment uses in accordance with those sites identified in Table 4 of the Publication Draft Plan and the accompanying Proposals Map. 4.74 In the west of the Borough, one site is allocated for employment. The site is ref 743, in Broomhouse Lane, Edlington and comprise 0.74 ha for B2 use. The site has full planning permission and has been built out. 4.75 There are no employment allocations proposed in the service towns of Mexborough, Conisbrough or Denaby. Soundness of the Policy 4 Employment Allocations 4.76 We object to the proposed Employment Allocations set out in Policy 4. As set out in our comments to Policy 3. We do not consider the policy will achieve the vision of Plan as it does not support existing business locations sufficiently. 4.77 The policy is not justified as the most appropriate strategy to support sustainable growth and communities based on the evidence base. Reasoning 4.78 Policy 3 includes a target for at least 481 hectares of employment land to be developed in the borough. The majority of this requirement comprises sites with planning permission (201 hectares) (para 4.61). New allocated sites comprise 164 hectares to support sectors such as distribution and warehousing in locations with good infrastructure and motorway access. 4.79 The allocation of these sites is supported in order to grow the economy and attract new businesses to the Borough. 4.80 Paragraph 4.59 of the Plan states that some smaller sites are allocated for light industry and manufacturing. The policy states that together with existing sites, the proposed new sites will be able to cater for new demand and replacement sites if a business decides to relocate or expand for investment reasons. 4.81 As we have remarked in our reasoning to policy 3, whilst the strategy for new growth in the south of the Borough is supported (import and airport), the existing economic businesses are not considered sufficiently. 4.82 Paragraph 4.33 states that the west of the Borough is constrained by lack of sites and that existing sites have been under pressure for alternative uses. The justification for not seeking alternative new sites in this location is not sufficient based on the evidence within the Plan that acknowledges the constrained economy and the existing work patterns of the population. 4.83 It is considered that additional sites should be allocated in the west of the borough, particularly in areas adjoining existing employment policy areas to enable the expansion of existing businesses. 4.84 A greater number of alternative sites in the west of the Borough will provide greater choice and flexibility over the plan period to protect existing employment in these locations. The proximity and provision of employment sites and opportunities in the deprived settlements of Mexborough, Conisbrough, Denaby and Edlington supports their regeneration and the sustainability of these settlements as a whole in accordance with NPPF. Proposed changes to the plan to make it Sound 4.85 It is considered that additional sites in the west of the Borough should be allocated to provide additional choice and flexibility for existing and new employers in the west of the Borough over the plan period. 4.86 The allocation of additional sites may require a further Green Belt review to enable existing sites to expand, as referred to in our comments to Policy 2. 4.87 Two sites at Broomhouse Lane Industrial Area could provide suitable employment allocations and provide expansion opportunities to existing employment areas for existing occupiers, namely Polypipe a large national company providing 800 local jobs in the area. 4.88 Details of the sites are provided in Section 5 of this representation.

Summary: Policy 4 allocates land for employment. One site (site is ref 743, in Broomhouse Lane) is allocated for employment in the west of the Borough reasons include: There are no employment allocations proposed in the service towns of Mexborough, Conisbrough or Denaby object to the proposed Employment Allocations set out in Policy 4 (policy is not justified as the most appropriate strategy to support sustainable growth) Support growth in the south but existing economic businesses are not considered sufficiently. Paragraph 4.33 states that the west of the Borough is constrained by lack of sites and that existing sites have been under pressure for alternative uses. The justification for not seeking alternative new sites in this location is not sufficient based on the evidence within the Plan that acknowledges the constrained economy and the existing work patterns of the population additional sites should be allocated in the west of the borough, particularly in areas adjoining existing employment policy areas to support expansion of existing businesses. To make the plan sound, additional sites should be allocated in the west of the Borough. Allocate additional site in the greenbelt (see response to policy 2) Two sites at Broomhouse Lane Industrial Area could provide suitable employment allocations and provide expansion opportunities to existing employment areas for existing occupiers, namely Polypipe a large national company providing 800 local jobs in the area.

Response: The Green Belt Topic Paper explains why there are no employment allocations within the Green Belt at this time i.e. it is considered that there are currently no exceptional circumstances. The explanatory text of Local Plan Policy 3 also explains that there is access to business parks across the border in Rotherham. These can be accessed using strong public transport links and road connectivity.
Comment:

2.1 The site is located on the north side of Broomhouse Lane on the eastern side of Edlington. The site is bounded to the west and north by the existing Polypipe site operations. Lord Heads Lane forms the eastern boundary of the site, beyond which is a former employment allocation EMP2 5, now Housing Allocation 646 with planning permission for 375 residential dwellings being brought forward by Harworth Estates. Broomhouse Lane forms the southern site boundary, beyond which is open space comprising Edlington Pit Wood. 2.2 The site comprises a square shape and is wooded. The site is covered by a Tree Preservation Order (TPO) No30, 1987 Edlington and referred to in some documents as Warmsworth Plantation. 2.3 The current UDP allocation is unclear but it is possibly a buffer zone. The site falls within the settlement boundary. 2.4 Discussions with the authority have stated the site is a candidate Local Wildlife Site - a site designated for its conservation interest but on its last assessment (2013) did not meet the Local Wildlife Site selection criteria. Proposed Allocation 2.5 The Regulation 19 Policies Map allocates the site as a Candidate Local Wildlife Site, policies 31 and 32 apply. The site is included within the settlement boundary, Policies 2 and 3 relating to Development Limits and Policy 11 relating to the Residential Policy Area apply. Additional designations and policies relating to biodiversity opportunity area, PEDL licence Area and Minerals Safeguarding Area also apply. (THIS REP IS FOR ONE SITE - FOR OTHER SITE SEE REP 05311)

Summary:

Description of site 1. woodland site is bounded to the west and north by the existing Polypipe site operations Covered by Tree Preservation Order (TPO) No30, 1987 the authority have stated the site is a candidate Local Wildlife Site - a site designated for its conservation interest but on its last assessment (2013) did not meet the Local Wildlife Site selection criteria. Regulation 19 Policies Map allocates the site as a Candidate Local Wildlife Site, policies 31 and 32 apply.

Response:

Noted
Chapter 4: Strategic Approach

Policy 4: Employment Allocations

The Plan acknowledges that Mexborough and Conisbrough are constrained by a lack of sites. The plan should allocate additional employment areas for employment use, but in accordance with NPPF Paragraph 4.33 recognises that existing employment sites in the area have been under pressure for other uses in the past, or do not meet the needs of modern business.

5.10 Paragraph 4.33 recognises that existing employment sites in the area have been under pressure for other uses in the past, or do not meet the needs of modern business. 5.11 The Plan acknowledges that Mexborough and Conisbrough are constrained by a lack of sites.

Therefore, it is appropriate to consider the allocation of employment sites adjoining Broomhouse Lane Industrial Site which will enable the existing occupier, Polypipe to expand and continue to operate efficiently from this location. 5.12 Two additional site allocations detailed below will provide additional choice and flexibility to the existing national occupier on Broomhouse Lane Industrial Estate, Polypipe. 5.13 Polypipe Building Products are one of the largest employers in the Doncaster area manufacturing above and below ground plastic building products in housebuilding and the DIY markets. 5.14 The company Head Quarters are located at their site on Broomhouse Lane Industrial Estate where they employ around 850 staff, many of whom come from the local area. 5.15 Polypipe have another site in Doncaster, but Broomhouse Lane is the spiritual home and Head Quarters of the group where they operated from for almost 40 years.

5.16 The site is constrained because it is the spiritual home and Head Quarters of the group where they operated from for almost 40 years. The two sites detail the spatial home and headquarters of the group where they operated from for almost 40 years. 5.13 Polypipe Building Products are one of the largest employers in the Doncaster area manufacturing above and below ground plastic building products in housebuilding and the DIY markets. 5.14 The company Head Quarters are located at their site on Broomhouse Lane Industrial Estate where they employ around 850 staff, many of whom come from the local area. 5.15 Polypipe have another site in Doncaster, but Broomhouse Lane is the spiritual home and Head Quarters of the group where they operated from for almost 40 years.

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Comment:

3.1 This section of the response provides support for the allocation of Site 001: Junction 6 M18, Thorne North for employment use as under Policy 4: Employment Allocations, and provides further comment on the detail of this policy. 3.2 The allocation of Site 001: Junction 6 M18, Thorne North to provide 73.63 hectares of employment use including business (B1b/c), general industry (B2) and storage and distribution (B8) alongside ancillary employment uses is supported, as is the identification of Site 001 as a Major Employment Site on the Key Diagram, and as an Employment Allocation on the accompanying Policies Map. 3.3 As demonstrated in Section 2.0, the allocation of Site 001 clearly accords with the wider spatial strategy set by strategic policies 2 and 3 in proposing major employment development suitable for logistics, manufacturing and light industrial uses outside Doncaster’s main urban area, albeit adjoining the Main Town of Thorne and Moorends and its resident population, in an area which is attractive to the market, can accommodate large buildings, and has good access to the strategic transport/motorway network. The site therefore provides the opportunity to deliver the strategic requirements established by Policy 3, and in particular the sustainability and regeneration benefits of locating strategic employment land accessible to the available workforce within the north of the Borough. 3.4 Indeed, the site has been selected for allocation following comprehensive assessment in a number of evidence base documents including the Employment Land Review and Update, Sustainability Appraisal, and Site Selection Methodology which accompany the Local Plan: Publication Draft, and none of these documents identify a more suitable site to be allocated for the delivery of strategic employment needs within the north of the Borough. 3.5 The Council is therefore justified in allocating this site on the basis of the strategic spatial strategy (Policy 2) and identified priorities for the location and distribution of growth (Policy 3). 3.6 Furthermore, as demonstrated below, the site is deliverable and therefore comprises an effective allocation and policy approach in accordance with paragraph 35 of the NPPF.

Tests of Soundness:

Summary:

The allocation of Site 001 is supported together with the identification of the site as a Major Employment Site on the Key Diagram and as an employment allocation on the Policies Map. Site 001 clearly accords with the wider spatial strategy set by strategic policies 2 and 3 in proposing major employment development suitable for logistics, manufacturing and light industry uses outside Doncaster’s main urban areas, albeit adjoining the Main Town of Thorne and Moorends and its resident population. It is in an area which is attractive to the market, can accommodate large buildings and has good access to the strategic transport/motorway network. The site provides the opportunity to deliver the strategic requirements established by Policy 3. Site 001 has been selected following comprehensive assessment in a number of evidence base documents including the Employment Land Need Assessment, Sustainability Appraisal and Site Section methodology. None of these identify a more suitable site in the north of the borough. The Council is justified in allocating this site on the basis of Policy 2 and 3. The site is deliverable and comprises an effective allocation and policy approach in accordance with NPPF para 35.

Response:

Comments in support of the proposed allocation of Site 001 (Thorne North) are noted.
3.7 This response to the Local Plan is supported by a detailed Delivery Statement which demonstrates that Site 001 is available for immediate development; is suitable for the development of employment uses as proposed by the allocation; and comprises a viable development site for which there is evident commercial interest and market demand. The Delivery Statement is included at Appendix 1 and its content is summarised below. (SEE EMAIL FOR Appendices) Availability and Land Ownership Considerations 3.8 The site is within the ownership of three parties which actively support the proposed allocation and future development of the site as set out in Section 2.0 and Appendix 2 of the accompanying Delivery Statement. The entirety of Site 001 is therefore immediately available for development, and there are no ownership issues which would prevent development of the site. 3.9 Barmston (Thorne) Ltd, as the selected delivery partner for the site, comprises a reputable developer with an established track record in the delivery of large scale employment sites within Doncaster and elsewhere in the Yorkshire region and beyond, and is committed to bringing forward development of the site at the earliest opportunity. Suitability and Market Demand 3.10 The illustrative masterplan included at Appendix 2 of these representations, shows how a mix of B1c, B2 and B8 uses can be accommodated on the full extent of the allocation alongside known site constraints and required mitigation measures. These uses are supported and indeed deemed necessary to maximise the development and employment opportunities presented by the site. 3.11 Section 6.0 of the Delivery Statement demonstrates that there are no technical constraints to prevent the site coming forward for development. A significant amount of technical assessment work has been undertaken as part of the current planning application on the site, and the vast majority of technical issues are now agreed with DMBC and other relevant statutory consultees. Significantly, agreement has been reached with Highways England which has confirmed that the proposed development can be accommodated as part of the existing highway network, and the Environment Agency and DMBC Drainage Officers are supportive of the development in flood risk terms subject to the inclusion of mitigation measures. All other technical matters are in the process of being resolved. 3.12 Advice from commercial agents CPP contained within Section 4.0 and Appendix 3 of the Delivery Statement confirms that there is demand for the type and scale of development proposed, and indeed that the site provides a number of significant and site-specific advantages, specifically the level nature of the site and its direct access to and visibility from the M18, that will help to ensure the timely delivery of Site 001 and the associated investment, job creation and regeneration. 3.13 Section 8.0 and Appendix 7 of the Delivery Statement demonstrate that development of Site 001 for employment uses as proposed by the allocation comprises sustainable development in social, economic and environmental terms, and will deliver a number of significant and site-specific benefits, not least in terms of job creation, local training opportunities and associated regeneration. As such development of the site will clearly stimulate employment opportunities and regeneration in the Thorne area of the District as identified by the Local Plan. Viability and Deliverability 3.14 Sections 6.0 and 7.0 and Appendix 6 of the Delivery Statement confirm that the site is straightforward to develop, and that there are no technical difficulties which would make development of the site excessively expensive, and no significant abnormal costs which would impact on the viability or deliverability of the proposals, and the absence of any major upfront infrastructure costs or reliance upon third party investment prevents any potential uncertainty or delay to delivery. 3.15 Section 4.0 of the Delivery Statement and the accompanying Commercial Report (included at Appendix 3 of the Delivery Statement) confirms that the site is attractive to commercial occupiers and, importantly, can accommodate the majority of market requirements, including those for increasingly large floorplates and cross-located facilities, as well as UK-wide footloose requirements. 3.16 The site is sufficiently served by existing utilities infrastructure, or these can be reinforced, in order to serve the development with power, telecommunications and other services. 3.17 The site is subject to a live outline planning application which is currently under consideration by DMBC, and Barmston is committed to working with DMBC to progress to determination of the application as quickly as possible, following which Barmston hope to commence site preparation work and site infrastructure within a period of six to 12 months, and to deliver the site on a phased basis in line with market demand over a 10 year period. Conclusions on Delivery 3.18 Overall, therefore, the Delivery Statement demonstrates that Site 001: Thorne North is available for development and that the introduction of employment uses (B1c, B2 and B8) on the site is suitable, achievable and deliverable within the plan period in line with allocation of the site as proposed by the Doncaster Local Plan: Publication Version (June 2019). 3.19 Barmston is therefore confident that the Council’s estimate that at least 51.54 hectares of the site can be brought forward over the plan period (as indicated in Table 4: Employment Site Allocations of the Local Plan Publication Version) and, subject to the level of commercial inquiries and site take up following the grant of planning permission, consider is likely that the entirety of the site would be developed before 2035. 3.20 It is therefore demonstrated that Policy 4 of the Doncaster Local Plan 2015-2035: Publication Version, and specifically the allocation of Site 001, comprises an effective and deliverable policy in accordance with the tests of soundness set out at paragraph 35 of the NPPF.
Summary:
The representation is supported by a detailed Delivery Statement which demonstrates that Site 001 is available for immediate development; is suitable for the development of employment uses as proposed by the allocation; and comprises a viable development site which has evident commercial interest and market demand. The Delivery Statement states the following: Availability and Land Ownership Considerations The site has three owners who actively support the allocation and development of the site. The whole site is immediately available for development with no ownership issues. Barmston (Thorne) Ltd are the selected delivery partner and comprise of a reputable developer with an established track record in the delivery of large scale employment sites. Suitability and Market Demand The illustrative masterplan shows how a mix of B1c, B2 and B8 uses can be accommodated alongside known site constraints and required mitigation measures. These uses are supported and deemed necessary to maximise the site’s opportunities. There are no technical constraints to prevent the site being developed. A significant amount of technical assessments have been undertaken for the planning application and the vast majority of technical issues are now agreed with DMBC and other relevant statutory consultees. Agreement has been reached with Highways England who have confirmed that the proposed development can be accommodated on the existing highway network. The Environment Agency and DMBC Drainage Officers are supportive in terms of flood risk and mitigation measures. Other technical matters are being resolved. Advice from commercial agents confirms there is demand for the type and scale of development proposed. The site provides a number of significant and site-specific advantages, specifically the level of the site and its direct access to and visibility from the M18. The development of the site is sustainable in social, economic and environmental terms and will deliver a number significant benefits not least in terms of job creation, local training opportunities and associated regeneration. Viability and Deliverability The site is straightforward to develop, there are no technical difficulties and there are no significant abnormal costs. There is an absence of any major up front infrastructure costs or reliance upon third party investment. The site is attractive to commercial occupiers and can accommodate the majority of market requirements including large floorplates and cross docked facilities. It is sufficiently served by existing utilities infrastructure, or these can be reinforced. The site is subject to a live planning application and Barnston is committed to working with DMBC to progress the application is quickly as possible. Barnston hope to commence site preparation work and site infrastructure within a period of six to 12 months. It will be on a phased basis over a 10 period. Conclusions Site 001 is available for development. It is suitable, achievable and deliverable within the plan period. Barnston is confident that the Council’s estimate of 51.54 ha can be brought forward over the plan period and consider that the entirety of the site can be developed before 2035. Policy 4 is an effective and deliverable policy and is in accordance with the tests of soundness.

Response:
Comments in support of the proposed allocation of Site 001 (Thorne North) are noted.
Comment:
3.38 As set out above, part C of Policy 4 requires major developments (defined as employment or other developments that propose 20 or more direct jobs) to agree local labour agreements which secure labour, services and supplies and training and recruitment opportunities. 3.39 Such an approach is supported and will assist in maximising Site 001’s contribution to widening access to learning and training opportunities for communities within North Doncaster and beyond (as set out in Section 8 of the accompanying Delivery Statement) and further assist in meeting the regeneration objectives for the north of Doncaster as set out within the Doncaster Local Plan: Publication Version.

Summary:
Support the approach in Part C of Policy 4 which requires major developments to agree local labour agreements. This will assist in maximising Site 001’s contribution to widening access to learning and training opportunities for communities within North Doncaster and beyond.

Response:
Noted. Support welcomed.
3.21 As set out above, Policy 4 of the Local Plan: Publication Version requires employment sites to be developed in accordance with the development requirements set out in Appendix 2 of the Local Plan: Publication Version, alongside other relevant Local Plan policies. 3.22 Appendix 2 details the following site specific development requirements in respect of Site 001: 1 Archaeology - The potential for the survival of buried archaeology below the zone impacted by ploughing is considered to be moderate to high. Further archaeological investigation is likely to be required if the site is brought forward for development. 2 Biodiversity - New habitat creation landscaping should be provided along the eastern boundary of the site to enhance the ecological corridor along the nearby River Don. Given the proximity of Thorne Moors habitats attractive to foraging nightjar would be beneficial. 3 Design - A masterplan and design guide will need to be developed with the Council prior to submission of a planning application. The existing Public Right of Way from North Common Road should be extended westward from its southern end to link with Selby Road. The site layout should be led by a robust landscape and visual impact assessment of the surrounding environment (views and viewpoints to be agreed with the Council). There is a requirement for significant landscape buffering around the edges of the site and/or the location of smaller buildings adjacent the open countryside. Likewise green corridors through the site are desirable to create a ‘green grid’ GI framework utilising existing drains where possible. Buildings should front onto public roads and create a high quality appearance from the motorway. Any large floor plate/large volume buildings should include quality architectural detailing which seeks to either break down the scale of the building or celebrate its prominence as a landmark building. Highest quality materials and detailing should be focused on the active, publicly viewable building elements, particularly those elevations that are visible from the motorway. 4 Transport - A Transport Assessment will be required. Previous comments have been made to the planning application on this site. Depending on whether this iteration of the scheme comes forward, these either need to be taken account of, or revised comments will be given as part of any future application. 5 Trees and Hedgerows - The vast majority of 1825 Enclosure hedgerows have been removed. Site layout should be informed by a tree survey. 3.23 As set out above and in the accompanying Delivery Statement, Site 001 is subject to a live outline planning application (application reference 16/02136/OUTM) for employment uses (all matters other than access reserved for future consideration) ("the planning application") which is in the process of being considered by DMBC. 3.24 The planning application is supported by a suite of technical information, including an Environmental Statement (ES), which assesses the impacts of the development on various aspects of the environment. Consultation responses have also been provided in respect of the majority of technical matters and as a result a number of site-specific issues have already been successfully addressed, and all other technical matters are in the process of being resolved. 3.25 Whilst such matters are assessed in the accompanying Delivery Statement, a response to the site specific matters outlined in Appendix 2 of the Local Plan: Publication Draft is provided below. Archaeology 3.26 As set out in Section 6.0 of the accompanying Delivery Statement, the desk based archaeological assessment submitted with the planning application has established that there is a low potential for archaeological remains within the proposed development site. Neither are there any above ground designated heritage assets located within the site or within 250m of the site boundary. 3.27 Given the outcome of this assessment and the low potential for adverse impacts on above or below ground heritage assets arising from development of the site, it is not considered that explicit reference needs to be made to matters of archaeology within the Development Requirements for Site 001. Adequate protection is afforded to below (and above) ground assets by way of wider Local Plan policies, notably Policy 36: Understanding and Recording the Historic Environment and Policy 40: Development Affecting Archaeology, both of which provide sufficient protection to below ground heritage assets and will ensure the inclusion of appropriate mitigation measures should these be required. 3.28 It is therefore recommended that reference to archaeological considerations from the Development Requirements for Site 001 be removed in order to provide a more justified and appropriate approach based on the evidence available and consistent with national planning policy. Biodiversity 3.29 The illustrative masterplan enclosed at Appendix 2 of these representations shows how Site 001 can be developed alongside new structural landscaping to the site’s boundaries, which offers the opportunity for habitat creation and ecological habitat in accordance with this principle. 3.30 Importantly, however, survey work undertaken in respect of the planning application demonstrates that the Thorne North site is not suitable foraging habitat for nightjar. As such reference to the provision of habitats attractive to foraging nightjar should be removed from the Development Requirements for Site 001 in order to ensure a proportionate and justified approach consistent with national planning policy and the requirements of other relevant environmental legislation. Indeed, it is not recommended that habitat attractive to nightjar be included on this site due to the close proximity of the M18 motorway and high risk of collision. The River Don is located to the west of Site 001, rather than the east as stated in Appendix 2 of the Local Plan (Publication Version). Design 3.31 As drafted, reference to design matters in Appendix 2 fails to reflect the current planning application which is already in the process of being considered by DMBC, and which Barmston is committed to progressing to determination at the earliest opportunity, and potentially undermines the introduction of alternative, but equally acceptable, approaches to the site’s development. 3.32 That said, the Illustrative Masterplan included at Appendix 2 broadly reflects the design principles set out above, including: 1 An appropriate approach to public rights of way within the site and pedestrian links to and through the site; 2 the provision of landscape buffers around the development’s edge; 3 retention of the existing drains and associated ecological stand-off areas; 4 the
creation of a high quality development when viewed from the motorway and from within the development itself; and 5 the provision of a range of building sizes. 3.33 The illustrative Masterplan is indicative only and shows one way in which the site could be developed to accommodate known site opportunities and mitigate constraints, as well as current market demands. 3.34 Crucially, and as set out within the accompanying Delivery Statement, one of the key benefits of Site 001 is that it provides flexibility to cater for a wide range of occupier requirements, including those with significant floorplates which are relatively scarce across the UK and will therefore generate potentially significant inward investment opportunities. It is therefore critical that the Local Plan avoids an overly prescriptive approach to site layout and design in order for the development and employment opportunities presented by the site to be maximised in line with the regeneration objectives established by the Doncaster Local Plan. 3.35 It is therefore suggested that reference is made to future development of the site as being required to be informed by LVIA and those overarching design principles 1-5 referred to above, whilst allowing the site specific layout and design to be assessed as part of determination of the planning application (at outline and reserved matters stage) with reference to occupier requirements and wider Local Plan Policies, notably those within Chapter 12, which seek to secure high quality, inclusive and well-landscaped design. Transport 3.36 Reference to transport matters as drafted within Appendix 2 of the Local Plan: Publication Version is supported. The wording appropriately reflects the agreed highways position to date and rightly refers to the requirement for any subsequent scheme revisions to take account of this advice, and/or to seek further agreement of highways matters in a revised or updated Transport Assessment work should this be required. Trees and Hedgerows 3.37 As set out in the Delivery Statement, there are limited existing trees on site, which are generally in poor condition or compromised by overhead electricity wires, and there is no objection to redevelopment of the site by DMBC’s Tree Officer. As such, and on the basis that the majority of hedgerows on the site have been removed, whilst the requirement for a tree survey to inform the site masterplan is reasonable, it is questionable whether explicit reference to trees and hedgerows is required for Site 001. (SEE EMAIL FOR Representation Appendices)

Summary:

Appendix 2 of the Local Pan sets out the following site specific requirements for Site 001. 1. Archaeology - The potential for the survival of buried archaeology below the zone impacted by ploughing is considered to be moderate to high. Further archaeological investigation is likely to be required if the site is brought forward for development. 2. Biodiversity - New habitat creation landscaping should be provided along the eastern boundary of the site to enhance the ecological corridor along the nearby River Don. Given the proximity of Thorne Moors habitats attractive to foraging nightjar would be beneficial. 3. Design - A masterplan and design guide will need to be developed prior to submission of a planning application. The existing Public Right of Way from North Common Road should be extended westward. The site layout should be led by a robust landscape and visual impact assessment of the surrounding environment. There is a requirement for significant landscape buffering around the edges of the site and/or the location of smaller buildings adjacent the open countryside. Green corridors through the site are desirable to create a ‘green grid’ framework utilising existing drains where possible. Buildings should front onto public roads and create a high quality appearance from the motorway. Any large floor plate/large volume buildings should include quality architectural detailing. Highest quality materials and detailing should be focused on the active, publicly viewable building elements. 4. Transport - A Transport Assessment will be required. Previous comments have been made to the planning application on this site. Depending on whether this iteration of the scheme comes forward, these either need to be taken account of, or revised comments will be given as part of any future application. 5. Trees and Hedgerows - The vast majority of 1825 Enclosure hedgerows have been removed. Site layout should be informed by a tree survey. There is a live outline planning application (application reference 16/02136/OUTM) which is being considered by DMBC. It is supported by a suite of technical information, including an Environmental Statement (ES). Consultation responses have also been provided for the majority of technical matters, a number of site-specific issues have been successfully addressed, and all other matters are being resolved. A response to the site specific matters outlined in Appendix 2 of the Local Plan is provided below: Archaeology - A desk based archaeological assessment submitted with the planning application has established that there is a low potential for archaeological remains within the proposed development site. Neither are there any above ground designated heritage assets located within the site or within 250m of the site boundary. Therefore it is not considered that explicit reference needs to be made to archaeology within the Development Requirements. Adequate protection is afforded to below (and above) ground assets by way Local Plan policies Policy 36 and Policy 40. Reference to archaeological considerations in Appendix 2 should be removed in order to provide a more justified and appropriate approach based on the evidence available and consistent with national planning policy. Biodiversity - The indicative illustrative masterplan shows how the site can be developed alongside new structural landscaping which will offer the opportunity for habitat creation and ecological habitat. The survey work for the planning application demonstrates that the site is not suitable for foraging habitat for nightjar. Reference to the provision of habitats attractive to foraging nightjar should be removed from the Development Requirements. It is not recommended that habitat attractive to nightjar be included on this site due to the close proximity of the M18 motorway and high risk of collision. The River Don is located to the west of Site 001, rather than the east as stated in Appendix 2 of the Local Plan (Publication Version). Design - Reference to design matters in Appendix 2 fails to reflect the current planning application. The site's Illustrative Masterplan broadly reflects the design principles set out including: 1. An appropriate approach to public rights of way within the site and pedestrian links to and through the site; 2. the provision of landscape buffers around the development's edge; 3. retention of the existing drains and associated ecological stand-off areas; 4. the creation of a high quality development when viewed from the motorway and from within the development itself; and 5. the provision of a range of building sizes. One of the key benefits of the site is that it provides flexibility to cater for a wide range of occupier requirements, including those with significant floorplates. The Local Plan should avoid an overly prescriptive approach to site layout and design so that development and employment opportunities can be maximised. Reference should be made to future development of the site as being required to be informed by LVIA and those overarching design principles 1-5 referred to above, whilst allowing the site specific layout and design to be assessed as part of determination of the planning application (at outline and reserved matters stage) with reference to occupier requirements and wider Local Plan Policies, notably those within Chapter 12, which seek to secure high quality, inclusive and well-landscaped design. Transport 3.36 Reference to transport matters as drafted within Appendix 2 of the Local Plan: Publication Version is supported. The wording appropriately reflects the agreed highways position to date and rightly refers to the requirement for any subsequent scheme revisions to take account of this advice, and/or to seek further agreement of highways matters in a revised or updated Transport Assessment work should this be required. Trees and Hedgerows 3.37 As set out in the Delivery Statement, there are limited existing trees on site, which are generally in poor condition or compromised by overhead electricity wires, and there is no objection to redevelopment of the site by DMBC’s Tree Officer. As such, and on the basis that the majority of hedgerows on the site have been removed, whilst the requirement for a tree survey to inform the site masterplan is reasonable, it is questionable whether explicit reference to trees and hedgerows is required for Site 001. (SEE EMAIL FOR Representation Appendices)

Response:

Support for the allocation of site 001 (Thorne North) and the provision of technical assessments for the planning application are noted.
In order to provide further information and/or clarification regarding the support for Policy 2 / 3 / 31. In order to provide further information and/or clarification on any of the points raised within the accompanying Representations Report and/or Delivery Statement in respect of Policy 4 and the allocation of Site 001: J6, M18, Thorne North for employment use and to directly address any comments that may be raised by objectors to the allocation.

Area: Chapter 4: Strategic Approach

Policy: Policy 4: Employment Allocations

Tests of Soundness:

1.1 This document has been prepared by Lichfields on behalf of Mr Donald Parkinson and Barmston (Thorne) Ltd and comprises a formal consultation response to the Doncaster Local Plan 2015-2035: Publication Version (June 2019). 1.2 The response focuses mainly on providing support for the allocation of land at Junction 6 of the M18 to the north of Thorne for employment uses. This site is identified under site reference 001: Thorne North and comprises an Employment Allocation to provide 73.63 ha of land for employment use including business (B1 b/c), general industry (B2) and storage and distribution (B8) uses in accordance with draft Policy 4: Employment Allocations (Strategic Policy). 1.3 Barmston (Thorne) Ltd comprise the delivery partner for the site, the vast majority of which is owned by the Parkinson family. Both the Parkinson family and Barmston (Thorne) Ltd welcome the opportunity to engage in consultation on the Local Plan: Publication Version and to present their full support for the allocation of Site 001, and look forward to engaging further with the Local Plan process at Examination stage. 1.4 Officers will be aware that the Parkinson family has actively engaged in previous versions of the Local Plan in respect of Site 001, and that the site is subject to an outline planning application for the development of employment uses which is in the process of being considered by Doncaster Metropolitan Borough Council (DMBC). 1.5 A separate Delivery Statement has been prepared, and is appended to this report (see Appendix 1), which considers such matters as land ownership, commercial requirements and market demand, deliverability and viability, and a consideration of the sustainability credentials of the site. The report demonstrates that Site 001 is available for immediate development; is suitable for the development of employment uses as proposed by the allocation; and comprises a viable development site for which there is evident commercial interest and market demand. The site is therefore wholly deliverable in order to meet Doncaster's objectively assessed employment needs in the forthcoming plan period in accordance with the requirements of national planning policy. 1.6 The Delivery Statement is supported by an indicative masterplan which shows how a mix of B8, B2 and B1c uses can be delivered on the site, and which is also referred to in this response. 1.7 The response also provides support for other strategic policies associated with the delivery and location of employment land across the Borough, and comments on a limited number of wider thematic policies. Soundness 1.8 Since the Local Plan is at Publication Draft stage, comments are invited on the basis of whether the plan is considered to be legally compliant and meets the tests of soundness, as set out within paragraph 35 of the National Planning Policy Framework (NPPF), and is: - Positively prepared - Justified - Effective; and - Consistent with national policy. 1.9 Specific reference is made to the tests of soundness as relevant throughout this response. 1.10 We respectfully request the opportunity to expand on the comments made within these representations at the forthcoming Examination in Public. Response Structure 1.11 The remainder of the response to the Doncaster Local Plan 2015-2035: Publication Version (June 2019) is structured as follows: 1 Section 2.0 refers to relevant strategic policies within the plan, including the amount and location of strategic employment land across the Borough; 2 Section 3.0 provides detailed support for the allocation of Site 001, including information regarding the site’s availability, suitability and viability with reference to the accompanying Delivery Statement and site masterplan, and other requirements of policy 4, and considers the development requirements for the site (as set out in Appendix 2 of the Local Plan); 3 Section 4.0 provides comment on a limited number of thematic policies within the Local Plan Publication Version; and 4 Section 5.0 provides a summary and conclusions. 1.12 As referenced above, the represented are supported by the following appendices: 1 Appendix 1 - Site 001 - J6 M18, Thorne North: Delivery Statement 2 Appendix 2 - Site 001 - J6 M18, Thorne North: Illustrative Masterplan (SEE EMAIL FOR Appendices)

Summary:

Support for the allocation of Site 001 Thorne North. The site provides 73.63 ha of land for employment uses in accordance with draft Policy 4: Employment Allocations. The site has a delivery partner and is mainly owned by a single landowner. The site is subject to an outline planning application. The documentation demonstrates that the site is available for immediate development; is suitable for the development of employment uses; and comprises a viable development site for which there is commercial interest and market demand. The site is wholly deliverable to meet Doncaster’s objectively assessed employment needs in the plan period. There is also support for other strategic policies associated with the delivery and location of employment land across the borough.

Response:

Support for Policy 4 and the allocation of site 001 (Thorne North) is noted.
2.34 Policy 4 sets out employment allocations that will help deliver the spatial strategy and meet the level and distribution of employment growth in order to deliver the spatial strategy. 2.35 The site has not been included as an Employment allocation and is shown to be retained in the Green Belt. DLP objects to this approach, which is considered to be unsound. Although if the site is removed from the Green Belt, housing delivery would be sought, due to the proximity of the site to neighbouring employment uses, the site could also support local employment opportunities. 2.36 Section 4 of this representation sets out a detailed assessment of the site including reference to the site context, deliverability and capacity of the site, and an assessment of alternative sites promoted for development within Askern, in order to demonstrate that the site is appropriate and deliverable for a range of uses.

**Summary:**
Policy 4: Employment Allocation (Strategic Policy). Proposes new site for allocation. o the site could support local employment opportunities. o Objects to Green Belt designation (have presented detailed GB review to justify removal)

**Response:**
Noted
The proposed employment allocation is situated to the south of Broomhouse Lane and would form an extension to the existing employment policy area on the south of Broomhouse Lane. The proposed allocation comprises land that currently forms part of a large area of public open space. The specific area is to be determined but it is considered that approximately 50% of the area of open space could be allocated for employment use with the remaining 50% retained and enhanced as open space. The northern part of the open space, adjoining the existing employment policy area currently comprises an area of play equipment on hardstanding and areas of grass. The southern area of open space is laid to grass with a number of paths and desire lines crossing the space between the residential areas to the west and Edlington Wood to the south and east. The northern boundary of the proposed site is formed by the Broomhouse Lane Employment Area. The area is currently occupied by buildings, hardstanding and car park currently used by Polypipe staff. As referred to above, the eastern and southern boundary of the open space area (proposed site) is formed by Edlington Wood. To the west are residential areas, site reference 638 runs close to the eastern boundary. Development of the site for 387 new dwellings has started. It is considered that the site should be allocated for employment use to provide additional sustainable land for existing businesses on the Broomhouse Lane Industrial Estate. The site would provide deliverable land to ensure Polypipe could grow and expand their business to continue operating viably and efficiently from their current location in accordance with the plans vision. The company is a main employer in the local area and wider borough and provides sustainable employment to the area. The economic activity in the area provides a number of social benefits which ensure the sustainability and vibrancy of sustainable communities. (THIS REP IS FOR ONE SITE - FOR OTHER SITE SEE REP 05285)
### Summary of Policy 4 Employment Allocations

<table>
<thead>
<tr>
<th>Policy 4 allocates land for employment in accordance with those sites identified in Table 4 of the Publication Draft Plan and the accompanying Proposals Map.</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.74 In the west of the Borough, one site is allocated for employment. The site is ref 743, in Broomhouse Lane, Edlington and comprise 0.74 ha for B2 use. The site has full planning permission and has been built out.</td>
</tr>
<tr>
<td>4.75 There are no employment allocations proposed in the service towns of Mexborough, Conisborough or Denaby. Soundness of the Policy 4 Employment Allocations 4.76 We object to the proposed Employment Allocations set out in Policy 4. As set out in our comments to Policy 3. We do not consider the policy will achieve the vision of Plan as it does not support existing business locations sufficiently.</td>
</tr>
<tr>
<td>4.77 The policy is not justified as the most appropriate strategy to support sustainable growth and communities based on the evidence base. Reasoning 4.78 Policy 3 includes a target for at least 481 hectares of employment land to be developed in the borough. The majority of this requirement comprises sites</td>
</tr>
<tr>
<td>with planning permission (201 hectares) (para 4.61). New allocated sites comprise 164 hectares to support sectors such as distribution and warehousing in locations with good infrastructure and motorway access.</td>
</tr>
<tr>
<td>4.79 The allocation of these sites is supported in order to grow the economy and attract new businesses to the Borough. 4.80 Paragraph 4.59 of the Plan states that some smaller sites are allocated for light industry and manufacturing. The policy states that together with existing sites, the proposed new sites will be able to cater for new demand and replacement sites if a business decides to relocate or expand for investment reasons. 4.81 As we have remarked in our reasoning to policy 3, whilst the strategy for new growth in the south of the Borough is supported (port and airport), the existing economic businesses are not considered sufficiently.</td>
</tr>
<tr>
<td>4.82 Paragraph 4.33 states that the west of the Borough is constrained by lack of sites and that existing sites have been under pressure for alternative uses. The justification for not seeking alternative new sites in this location is not sufficient based on the evidence within the Plan that acknowledges the constrained economy and the existing work patterns of the population.</td>
</tr>
<tr>
<td>4.83 It is considered that additional sites should be allocated in the west of the borough, particularly in areas adjoining existing employment policy areas to enable the expansion of existing businesses. 4.84 A greater number of alternative sites in the west of the Borough will provide greater choice and flexibility over the plan period to protect existing employment in these locations. The proximity and provision of employment sites and opportunities in the deprived settlements of Mexborough, Conisborough, Denaby and Edlington supports their regeneration and the sustainability of these settlements as a whole in accordance with NPPF.</td>
</tr>
<tr>
<td>Proposed changes to the plan to make it Sound 4.85 It is considered that additional sites in the west of the Borough should be allocated to provide additional choice and flexibility for existing and new employers in the west of the Borough over the plan period. 4.86 The allocation of additional sites may require a further Green Belt review to enable existing sites to expand, as referred to in our comments to Policy 2.</td>
</tr>
<tr>
<td>4.87 Two sites at Broomhouse Lane Industrial Area could provide suitable employment allocations and provide expansion opportunities to existing employment areas for existing occupiers, namely Polypipe a large national company providing 800 local jobs in the area. 4.88 Details of the sites are provided in Section 5 of this representation.</td>
</tr>
</tbody>
</table>

### Summary:

Policy 4 allocates land for employment. one site (site is ref 743, in Broomhouse Lane) is allocated for employment in the west of the Borough. The site is located in the west of the Borough, particularly in areas adjoining existing employment policy areas to enable the expansion of existing businesses. A greater number of alternative sites in the west of the Borough will provide greater choice and flexibility over the plan period to protect existing employment in these locations. The proximity and provision of employment sites and opportunities in the deprived settlements of Mexborough, Conisborough, Denaby and Edlington supports their regeneration and the sustainability of these settlements as a whole in accordance with NPPF. Proposed changes to the plan to make it Sound It is considered that additional sites in the west of the Borough should be allocated to provide additional choice and flexibility for existing and new employers in the west of the Borough over the plan period. The allocation of additional sites may require a further Green Belt review to enable existing sites to expand, as referred to in our comments to Policy 2. The Green Belt Topic Paper explains why there are no employment allocations within the Green Belt at this time. It is considered that there are currently no exceptional circumstances. The explanatory text of Local Plan Policy 3 also explains that there is access to business parks across the border in Rotherham. These can be accessed using strong public transport links and road connectivity.

### Response:

The land allocation is based on the forecast requirement. The requirement is based on independent job number forecasts undertaken by Peter Brett Associates (Economic Forecasts and Housing Needs Assessment). Sufficient land has been proposed for allocation to meet the requirement. The Green Belt Topic Paper explains why there are no employment allocations within the Green Belt at this time. It is considered that there are currently no exceptional circumstances. The explanatory text of Local Plan Policy 3 also explains that there is access to business parks across the border in Rotherham. These can be accessed using strong public transport links and road connectivity.
Comment Ref: C/Site: SouthBroomhouseLane/05311/1/002
Attend Examination: Attend Hearing
Reason: Attendance at the hearing will enable a thorough discussion regarding the deliverability of the strategy of the plan.
Area: Chapter 4: Strategic Approach
Policy: Policy 4: Employment Allocations
Tests of Soundness:

Comment:

2.6 The site is situated to the south of Broomhouse Lane which forms the northern boundary of the site. To the east of the site is an area of hardstanding used as vehicle/trailer parking for Polypipe and a wooded area. Residential development is located to the west and open space to the south. 2.7 The site itself comprises two specific parts. Part 1 is situated to the front of the site adjoining Broomhouse Lane and comprises a roughly rectangular area and is employment use. Half of this area is currently used as car parking for Polypipe staff, the remaining area is occupied by two residential bungalows and Summerfield Industrial Park. 2.8 Part 2 of the site lies to the rear and comprises an area of open space, including a play area (Broomhouse Lane Playground). The play area sits on the northern edge of the larger area of open space which has a number of footpaths running to the south and west providing access into pit wood. 2.9 The front part of the site (part 1) is allocated as an existing employment site, reference EMP2 4 in the adopted UDP. The area to the south, part 2, falls within the defined Green Belt and is allocated as an open Space policy Area. Proposed Allocation 2.10 In the Publication Plan Policies Map, the employment allocation remains on the front part of the site, policy 5 Employment Policy Area therefore applies. Together with designations and policies associated with the development limits, minerals safeguarding, heat opportunity area and biodiversity opportunity area. 2.11 The second part of the site to the rear remains in the defined green belt and is allocated as open space, sport and recreation. Policies 2, 27 and 28 are relevant along with more general policies relating to minerals safeguarding, heat opportunity area and Biodiversity opportunities. (THIS REP IS FOR ONE SITE - FOR OTHER SITE SEE REP 05285)

Summary:

- Site 2 - Land to the south of Broomhouse Lane. Site comprises the existing car park and land immediately to the south. Notes provide a description of the site and location off Broomhouse Lane. The area is in 2 distinct halves. one part is a car park for staff and the other is an area of open space, including a play area (Broomhouse Lane Playground). The play area sits on the northern edge of the larger area of open space. The front part of the site (part 1) is allocated as an existing employment site, reference EMP2 4 in the adopted UDP. The area to the south, part 2, falls within the defined Green Belt and is allocated as an open Space policy Area. Publication Plan Policies Map, the employment allocation remains on the front part of the site, policy 5 Employment Policy Area therefore applies. Together with designations and policies associated with the development limits, minerals safeguarding, heat opportunity area and biodiversity opportunity area.

Response:

Noted.
Publication Local Plan Section two of this representation refers to two sites located at Edlington, adjoining Broomhouse Lane Industrial Estates. 5.2 As detailed in section 4 of this representation, ID Planning do not consider the Plan is its current form to be sound. The plan strategy seeks to protect existing business and provide opportunities for their growth and yet do not provide any new site allocations or expansion opportunities for existing businesses in the west of the borough, specifically Edlington to grow. 5.3 The majority of employment allocations are provided as strategic allocations at the iport and airport. Whilst we do not object to the principal of the strategy seeking to grow these strategic areas and attract new businesses and investment. The plan is unjustified in not providing new sites and opportunities in other areas (particularly in the west of the borough). 5.4 The evidence in the Plan recognises that the economy is relatively self contained and states that with the majority of workers travelling to work within the area and a fifth travel to work within the same electoral ward in which they live. It is these patterns that make the Main towns and service towns and villages such sustainable locations alongside the main urban area. 5.5 The plan includes a target for 230 new homes to be allocated in Edlington but the supply includes a number of existing permissions which together with two allocations will provide for 665 new dwellings in the town over the plan period. 5.6 In addition, between 940 and 1,960 new homes are to be provided in Mexborough, Conisbrough and Denaby. 5.7 In order to for the plan to maintain sustainable communities it is necessary to respond to the planned population growth in this part of the Borough and recognise the existing work patterns. As a result it is necessary to ensure there is choice and flexibility for existing businesses to remain in the local area particularly if they wish to expand. 5.8 In its current form the plan identifies the existing employment policy areas on the Proposals Map. There are currently five existing employment sites identified in Mexborough, Conisbrough, Denaby and Edlington. 5.9 Policy 5 of the plan seeks to protect existing employment areas for employment use, but in accordance with NPPF, subject to a number of criteria being met, alternative uses can be assessed on their merits and permitted in these areas. 5.10 Paragraph 4.33 recognises that existing employment sites in the area have been under pressure for other uses in the past, or do not meet the needs of modern business. 5.11 The Plan acknowledges that Mexborough and Conisbrough are constrained by a lack of sites. Therefore, it is appropriate to consider the allocation of employment sites adjoining Broomhouse Lane Industrial Site which will enable the existing occupier, Polypipe to expand and continue to operate efficiently from this location. 5.12 Two additional site allocations detailed below will provide additional choice and flexibility to the existing national occupier on Broomhouse Lane Industrial Estate, Polypipe. 5.13 Polypipe Building Products are one of the largest employers in the Doncaster area manufacturing above and below ground plastic building products used in housebuilding and the DIY markets. 5.14 The company Head Quarters are located at their site on Broomhouse Lane Industrial Estate where they employ around 850 staff, many of whom come from the local area. 5.15 Polypipe have another site in Doncaster, but Broomhouse Lane is the spiritual home and Head Quarters of the group where they operated from for almost 40 years. 5.16 The site is constrained and additional expansion areas are required to ensure the efficient and viable operation of the business in the future. The two sites detailed below provide suitable expansion potential.

Summary:
Publication Local Plan Section two of this representation refers to two sites located at Edlington. The Plan protects existing businesses and provides opportunities for their growth and yet does not provide new site allocations or expansion opportunities for existing businesses in the WEST of the borough, specifically Edlington. Majority of employment allocations are provided as strategic allocations at the iport and airport. Evidence in the Plan recognises that the economy is relatively self-contained. Majority of workers travel to work within the area and a fifth travel to work within the same electoral ward in which they live. These patterns that make the Main towns and service towns and villages such sustainable locations alongside the main urban area. To maintain sustainable communities it is necessary to respond to the planned population growth in this part of the Borough and recognise the existing work patterns. Policy 5 of the plan seeks to protect existing employment areas for employment use, but in accordance with NPPF, Paragraph 4.33 recognises that existing employment sites in the area are under pressure for other uses. The Plan acknowledges that Mexborough and Conisbrough are constrained by a lack of sites. The plan should allocate additional employment sites adjoining Broomhouse Lane Industrial Site which will enable the existing occupier, Polypipe to expand and continue to operate efficiently from this location site is constrained and additional expansion areas are required to ensure the efficient and viable operation of the business in the future.

Response:
The Green Belt Topic Paper explains why there are no employment allocations within the Green Belt at this time i.e. it is considered that there are currently no exceptional circumstances. There are employment opportunities in the west of the borough and in the wider Dearne Valley which is accessible to local residents via good transport links.
Attend Examination: Not Stated

Area: Chapter 4: Strategic Approach

Policy: Policy 4: Employment Allocations

Tests of Soundness:

Comment:
109 Signatures SITE 001 THORNE NORTH JUNCTION 6 - STOP DMBC PROPOSING ALLOCATION TO EMPLOYMENT LAND.

Summary:
Re Site 001 (proposed Employment site) Petition with 109 signatures opposing the proposed allocation.

Response:
The petition in objection to the proposed allocation of Site 001 is acknowledged and noted.
Comment Ref: C/Site 001/05316/1/001
Date: 30/09/2019
Organisation: Local Plan Publication (Sept 2019) - Petition 2
Representing: Local Plan Publication (Sept 2019) - Petition 2

Attend Examination: Not Stated

Reason:

Area: Chapter 4: Strategic Approach
Policy: Policy 4: Employment Allocations

Tests of Soundness:

Comment:

281 Signatures  PETITION TO STOP SITE 001 THORNE NORTH M18 JUNCTION 6 NOT TO BE PROPOSED FOR ALLOCATION AS EMPLOYMENT LAND IN DONCASTER LOCAL PLAN (2019)

Summary:

281 Signatures  PETITION TO STOP SITE 001 THORNE NORTH M18 JUNCTION 6 NOT TO BE PROPOSED FOR ALLOCATION AS EMPLOYMENT LAND IN DONCASTER LOCAL PLAN (2019)

Response:
The letters and petition in objection to the proposed allocation of Site 001 is acknowledged and noted.
Comment:

289 Signatures I Object to Site 001 Thorne North Junction 6 M18 proposed as Employment Land. Site 001 is Flood Zone 3, it is 183 acres of floodplain, it is approximately 80m from the River Don, with climate change more areas are flooding, Thorne and Moorends need these floodplains. DMBC Air Pollution Control Officer does not support development on this land, increased traffic will worsen already poor air pollution in this area if developed. The whole area is part of The Humberhead Levels, it will have a devastating impact on all wildlife including protected species that live and hunt on it. Loss of high quality Grade 3 - “very good” agricultural land, we need this land to grow food. A vast area of countryside would be lost, replaced by gigantic ugly sheds on the approach to Thorne. The land lies outside the urban frame, it is the wrong side of the motorway, it is not a sustainable urban extension. No safe pedestrian/cycle routes can be identified to Site 001. We have enough warehouses in Thorne we do not need anymore. It is most definitely not a specific site identified for employment by the local community in the Neighbourhood Plan.

Summary:

Standard Letter submitted by 289 people in opposition to proposed allocation of site 001 Thorne North. Also lists the following issues: Flood risk. Air Pollution increase. Impact on wildlife. Loss of agricultural land. Loss of countryside. Not a suitable urban extension - outside urban frame. No safe pedestrian or cycle access. Site not identified in the Neighbourhood Plan.

Response:

The comments against the allocation of Site 001 are noted.
**Comment Ref:** C/North Common, Thorne/0951/5/001  
**Attend Examination:** Written Representation  
**Reason:** Chapter 4: Strategic Approach  
**Policy:** Policy 4: Employment Allocations  
**Tests of Soundness:** Justified  Consistent with national  

**Comment:**

Inclusion of the North Common, Thorne employment site is not sound or sustainable. Development would create an obtrusive, industrial character in a countryside location. This is dumping warehouse units in fields with no sense of place or ecology. The site is an important green connection between the lowland pasture of Fishlake and Thorne and Hatfield moors. This site would be degraded and destroyed. Development would be in conflict with Govt. legislation, regulations and the aspirations of the Habitats Directive, Biodiversity Action Plan, Humberhead Levels Partnership, Living Landscapes, Thorne and Hatfield Moors SSSI and DMBC policies in the local plan. The site is in a high risk flood zone and is only 2 metres above sea level. The plan relies on existing drainage systems but both Govt. and the Env. Agency admit present drainage systems are out of date and inadequate to deal with predicted climate change heavier rainfalls. The plan states that vulnerable development in flood zone areas would be avoided. Why is this vulnerable site allocated for development? The local plan claims to protect high grade agricultural land but includes this site which is high grade quality 2 land. Junction 6, M18 already fails air quality legislation and regulations. Development of this site would increase levels of pollution and congestion, harming public health and the environment. This plan creates toxic air zones. There is an over allocation of land for employment sites. With thousands of square feet lying empty throughout the borough it is evident that there is no great demand for speculative industrial units. It is worrying the sheer scale of green fields that this plan allocates for employment and housing sites. In a period of climate change and overpopulation, it is irresponsible to blight agricultural land, reducing the possibility of future generations to feed themselves. The plan weakens protection of countryside on the east of the borough. Countryside policy treats countryside on the east as less worthy than green belt on the west. Rare lowland pasture landscape in the east is very sensitive to development. Countryside policy should be changed to green belt so all citizens are treated equal. PROPOSED CHANGE Reduce the amount of agricultural land allocated for employment sites and housing. Instead of generic housing estates design more housing around communal gardens. Restore the 3,500+ empty and derelict homes in the borough and thus reduce the demand to build new homes. The DN7/Unity project site would be more appropriately developed as the site for a new Doncaster hospital. The Doncaster hospital site could then be recycled for housing. Countryside land on the east of the borough to be reclassified as green belt.

**Summary:**

Objects to allocation of Employment site at 'North Common, Thorne' (ref 001) Reasons: 1. Incursion into Countryside. 2. Loss of Green filed site. 3. Weakens the protection of the countryside in the East of the Borough making it 'less worthy' then Greenbelt to the West. 4. Impact on character of countryside. 5. Countryside Policy Area should be re-classified as Greenbelt. 6. Site is an important green connection between lowland pasture of Fishlake and Thorne and Hatfield Moors. 7. Conflicts with Governments habitats directive, Biodiversity action plan, Humberhead levels partnership, living landscapes, Thorne and Hatfield Moors SSSI and DMBC policies in the local plan. 8. High risk flood zone. 9. Current drainage systems inadequate to deal with climate change. 10. Why is a vulnerable site being proposed for allocation (contrary to Local Plan that says flood risk sites should be avoided) 11. Is high grade agricultural land 12. Impact on air quality - J6 M18 already fails legislation and regulations. 13. There is an over allocation of employment sites 14. There are other units lying empty in the Borough which shows evidence of lack of demand. Other issues: 1. Reduce the amount of agricultural land allocated for development. 2. Improve the design of housing sites - make less generic. 3. Restore the 3,500 plus empty properties in the borough - reduce the need for new homes. 4. The DN7/Unity site would be the most appropriate site for a new hospital. 5. The current Hospital site could be used for housing.

**Response:**

Comments against Site 001 are noted.
Policy 5: Employment Policy Areas

Chapter 4: Strategic Approach

Summary:

The employment requirement is largely made up of Site 001 and 941 (M18 J6 & RHADS Site 1) (Table 4). It is unclear how these spatially concentrated employment sites in peripheral areas away from town centres will meet future employment needs. It is disingenuous to say they are accessible via a range of transport modes when it will mainly be car. Allocating such road reliant sites is counter to the opportunities needed to combat climate change, Para 4.31 compounds this by associating the potential for employment growth in the north of the Borough to a putative A1-A19 link road, for which no proposals are actually shown, but if these proposals do emerge towards the end of the plan period then clearly that employment land would not come on-stream until much nearer to the 2050 date for the UK to achieve net zero carbon. In short, this is a 20th century economic vision based on Doncaster’s continuing obsession with building roads and peripheral employment sites, and it has no place in preparing the Borough for the realities of the mid 21st century that will be defined by how places respond to the challenges of climate change. PROPOSED CHANGE As we have consistently argued, Doncaster needs to provide evidence of how its economic growth ambitions are compatible with meeting future employment needs in a genuinely sustainable way. We are unconvinced that a growth strategy focusing on road-based distribution and logistics is compatible with this, but if it is then the evidence must be provided to demonstrate it. Otherwise, the Plan is enabling a flawed growth strategy, and both must be revised. Specifically, we consider that the focus on a small number of very large, peripheral sites needs to be replaced with a much finer-grain approach addressing the skills and needs of different communities across the Borough, accompanied by a plan to de-carbonise the employment patterns of the Borough.

Response:

The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites. The responses to the Issues and Options Consultation highlighted that jobs/sites do not need to be located next to the people they serve. Also the market analysis of the sites/jobs requirements shows that there is a strong continued demand for large sites for logistics with the M18 corridor being the preferred location. The Employment Land Review (Colliers 2019) and Employment Land Need Assessment demonstrate this. The Local and its policies should be read as a whole as it considers the issue of climate change and resilience. It has also been subject to Sustainability Appraisal. For example, Policy 13 sets out improvements to the Strategic Transport Network (including public transport) which will ensure that employment sites can be accessed by all modes of transport.
The Local Plan in some cases fails to... the policies and proposals needed to guide development to the right places whilst protecting and improving the environment and people’s quality of life.” In particular, any Residential Area that has a boundary or near location (200m) to a Policy 4: Employment Allocation Policy 5: Employment Policy Area The effect on Residential Areas that have boundaries or are within 200m to Policy 4 & 5 are or can be Poor Mental & Physical Health, Disturbed random Sleep patterns, Anxiety, Depression, to name but a few. Caused by, Fear of Toxic Emissions or Explosion 24-hour process noise 24-hour random noise from delivery or business activities Pollution Heavy / Increased Traffic Unsightly Industrial Landscape All of which in the past have failed to be controlled or stopped by Planning or enforcement due to lack of local / government Policy support. This also contradicts, para 13.1, 13.2, 13.3 Policy 51: Health Policy 55: Pollution It also fails to consider, HSE Consultation Mapping impacts and Explosion zones, Restrictions on B2 General Industry activities involving C.O.M.A.H. sites (Control of Major Accident Hazards), or Hazardous substance usage and storage with B2 & B8 When any Policy Area which has a boundary or location within 200m of a Residential Area. The witnessed current effect of the above is causing Residential displacement (people moving or wanting to move away from long established Residential areas). This has caused poor mental and physical health for those that have left or still remain. General Note. I have not come across any new road designs to facilitate the ever increasing need to allow car school runs and drop offs with several known reports of car/pupil incidences in the last year. I also see no new/existing road development schemes within our area to facilitate the ever-increasing traffic, cars and lorries, which these Policies 4&5 generate. Regardless of there placement next to a motorway network they still generate a draw of traffic within and through our towns and villages without restriction or control. All comments are provided from a layman’s point of view and are not meant to be defamatory in anyway. I also apologise if my views/comments are actually covered already within the 386 pages of the Plan. PROPOSED CHANGE It has to be made clear without questionable doubt or appeal that, any activity or Policy within say a respected boundary of 250m from any Residential property or Area can only operate within, B1 b/c or retail. Only operate with set limited hours including its running of process plant and machinery, infrastructure, business activities, deliveries, people and vehicle movements. Not emit noise of any level or singular frequency or tone. Not create COMAH/HSE Zoning have no detrimental effect to local amenities however “contested” For example, Policy 11: A) 2. & 3. B), should also be included within relevant policies such as Policy 4 & 5, but also expanded to cover issues highlighted above. Policy 4&5 should be tested against, Traffic Loading Environmental impact Residential Health & wellbeing Impact extending 250m beyond its boundaries to cover issues above. Policy 4&5 should only apply if sited 250m away from any Residential Area or Property Otherwise, the following should apply, B1 b/c or retail only. Only operate with set limited activity hours including its running of process plant, machinery, deliveries, people and vehicle movements. Not emit noise of any level or singular frequency or tone or multitone. Not create COMAH/HSE Zoning have no detrimental effect to local amenities however “contested”. It’s difficult to illustrate my point and its impact without past examples used as a test against the new policies. I am happy to discuss these if needed. But one thing I can assure you currently when it reaches any planning stage, it becomes too late for a whole list of reason. Policy plans should start the protection filter. Some references that may be of use. Seveso Directive provides guidance on policy with regards to Protecting the environment, health and our economy. Separation distances between chemical establishments and sensitive land use areas.

Summary:

Insufficient protection given to existing residential areas that have a boundary close to (200m suggested) an employment site. Impact on health with proximity of employment development caused by: o Fear of toxic emissions or explosion o 24hr process noise o 24 hr random noise o Pollution o Increased traffic o Negative Impact on landscape. All of the above contradict policies 51 Health and 55 pollution. Potentially hazardous uses should be restricted on employment sites close to residential areas (200mt suggested) Employment Policies should be amended to restrict what type of development and on operations on an employment site close to a residential area including: o B1 b/c or retail use only. o Limitations on hours for plant/machinery use, deliveries, vehicle movement. o Noise limitations o No hazardous use o No loss of local amenity. Parts A2 & 3B of Policy 11 should be included in Policy 4 & 5. Policy 4 & 5 should be tested against: o Traffic loading o Environmental impact o Residential health & well being o Impacts extending 250m beyond employment site boundary to cover above issues. No evidence of new road schemes to facilitate increased traffic from proposed employment sites in Thorne area.

Response:

The Local Plan allocates new employment sites to meet the identified requirement for land. All sites have to be ‘sustainable’, and are assessed against a range of criteria including Health and Safety, Access, Air Quality etc. (The sustainability Report by independent consultants ‘Wood’ is available on our website). No development should in theory have (on balance) a negative impact that outweighs the positive. Uses on sites. The uses of employment sites falls into three broad categories, Office, Industrial & Manufacturing and Warehousing in terms of the Local Plan allocations. It is not over prescriptive on the specific types of use. More detail of specific use is covered in the Planning Application process. Any allocated site would still need planning permission before any development. Any uses must fail within the boundaries of the ‘B’ type uses (i.e. Employment type) permitted on allocated employment sites. Any uses that could potentially cause a health and safety issue are strictly covered by Government regulations. Plus, it is the duty of an employer to provide a safe working environment for both workers and the surrounding area.
(regardless of the proximity of a residential area). Any negative impacts identified in the planning application process should be mitigated against and 'conditions' can be placed on any permission. Any uses on existing employment sites that are perceived to be causing a health and safety issue, a hazardous use, pollution or highways issue can be dealt with through Planning Enforcement. Any reported problems can be checked and resolved. Traffic Any new development has the potential to increase traffic on the roads. 'Highways capacity' is one of the criteria in the sustainability Appraisal (criteria 8b (i)). The impacts of new development have been looked at by the Councils 'Highways' team and also Highways England. No new development should cause a problem to the highways network and if any is highlighted mitigation will be needed. It is often the case that mitigation for increased traffic is achieved with improved movement management (traffic lights, junction improvements etc.) Regarding the suggestion for a 200mt boundary between employment sites. In review of the sites put forward as potential employment sites and those proposed for allocation it is not possible to only allocate sites that are more than 200mt from a residential area. In terms of the 'Sustainability Appraisal' any sites 200mt from an urban area would be likely to score 'negative impacts' in several of the assessment criteria (see Sustainability Assessment)

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Policy 4 identifies sites for employment uses and specifies the employment use types that would be supported. Policy 5 supports employment policy areas for employment uses. Minerals can only be worked where they occur. However, it is acknowledged that hydrocarbons can be won using alternative techniques such as directional drilling where conditions allow. Opposition to hydrocarbon developments often orientates around locational factors such as proximity to residential properties and in countryside areas access and landscape impact. As a consequence, the industry is often encouraged or redirected to industrial areas. It is therefore important that the Policies are flexible to allow other uses on the land allocations that may not fall within the identified use classes and particularly which may be temporary in nature, small in footprint and would not prejudice the longer term intention for development.

Summary:
Policy 4 identifies sites for employment uses and specifies the employment use types that would be supported. Policy 5 supports employment policy. Hydrocarbons can be won using directional drilling and industry is redirected to industrial areas. The policy needs to be flexible to allow for other use classes, especially if they are temporary.

Response:
Comment noted. The local plan should be read as a whole and other uses will be permitted where relevant considerations have been addressed.
Tests of Soundness:

Comment:
Emerging Policy 5 'Employment Policy Areas (Strategic Policy)' indicates that Employment Policy Areas, as defined on the Proposals Map, will continued to be supported primarily for employment uses. However, other uses will be supported provided that they meet a number of criteria set out by Policy 5. TVI support the criteria-based approach contained within Policy 5 which allows for some flexibility in uses on sites identified as 'Employment Policy Areas' in addition to employment. Area B of the land identified in Plan 1 is identified as an Employment Policy Area. TVI consider the identification of their land identified as 'Area B' as an Employment Policy Area to be sound, with Policy 5 allowing for suitable flexibility in the type of uses which could be accommodated on the site.

Summary:
TVI consider the identification of their land identified as 'Area B' as an Employment Policy Area to be sound, with Policy 5 allowing for suitable flexibility in the type of uses which could be accommodated on the site.

Response:
Comments noted.
Comment Ref: C/Policy 5/05285/1/009

Attend Examination: Attend Hearing

Reason: Attendance at the hearing will enable a thorough discussion regarding the deliverability of the strategy of the plan.

Area: Chapter 4: Strategic Approach

Policy: Policy 5: Employment Policy Areas

Tests of Soundness: Effective Legally Compliant

Comment:

Summary of Policy 5 Employment Policy Areas 4.89 Emerging Policy 5 indicates that Employment Policy Areas, as defined on the Proposal Map, will continue to be supported primarily for employment uses. However, other uses will be supported provided that they meet a number of criteria set out by policy 5 in accordance with NPPF which seeks to ensure that employment land is not protected for employment use if there is no reasonable prospect of land being used for that purpose. Soundness of the Policy 5 Employment Policy Areas 4.90 We consider that Policy 5 is sound in that it complies with NPPF to ensure that the employment land is not protected in perpetuity if there is no prospect of the land being used for that purpose. 4.91 However, as a result, the policy provides the potential for existing employment land to be lost over the plan period. This supports our objection to policy 4 of the plan and reasoning that alternative, additional sites should be provided in the west of the borough to provide choice and flexibility for occupiers in this area. 4.92 Paragraph 4.33 highlights that employment sites in the west of the borough have been under pressure for other uses (mainly housing). This is particularly evident in Edlington where the UDP employment site to the north east of Broomhouse Lane Industrial Estate obtained planning permission for residential development resulting in the remaining industrial estate being constrained by existing other uses and Green belt. 4.93 As referred to in our response to Policies 2 and 3, it is considered necessary to allocate additional employment sites in the west of the borough to provide sufficient choice and flexibility to existing businesses in the area. The presence of employment uses and businesses in the main towns and service towns and villages to the west of the borough play a significant role in the sustainability of these deprived areas. It is therefore important to provide sufficient land for choice, flexibility and churn in these areas to maintain the strong, sustainable and cohesive communities as recognised in the overall strategy.

Summary:

Policy 5 is sound, but the policy provides the potential for existing employment land to be lost over the plan period. This supports our objection to policy 4 of the plan and reasoning that alternative, additional sites should be provided in the west of the borough. Paragraph 4.33 highlights that employment sites in the west of the borough have been under pressure for other uses (mainly housing) and is evident in Edlington. As referred to in our response to Policies 2 and 3, it is considered necessary to allocate additional employment sites in the west of the borough to provide sufficient choice and flexibility to existing businesses in the area.

Response:

The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites. The Green Belt Topic Paper explains why there are no employment allocations within the Green Belt at this time i.e. it is considered that there are currently no exceptional circumstances. The explanatory text of Local Plan Policy 3 also explains that there is access to business parks across the border in Rotherham. These can be accessed using strong public transport links and road connectivity.
Summary of Policy 5 Employment Policy Areas

4.89 Emerging Policy 5 indicates that Employment Policy Areas, as defined on the Proposal Map, will continue to be supported primarily for employment uses. However, other uses will be supported provided that they meet a number of criteria set out by policy 5 in accordance with NPPF which seeks to ensure that employment land is not protected for employment use if there is no reasonable prospect of land being used for that purpose. Soundness of the Policy 5 Employment Policy Areas

4.90 We consider that Policy 5 is sound in that it complies with NPPF to ensure that the employment land is not protected in perpetuity if there is no prospect of the land being used for that purpose. 4.91 However, as a result, the policy provides the potential for existing employment land to be lost over the plan period. This supports our objection to policy 4 of the plan and reasoning that alternative, additional sites should be provided in the west of the borough to provide choice and flexibility for occupiers in this area. 4.92 Paragraph 4.33 highlights that employment sites in the west of the borough have been under pressure for other uses (mainly housing). This is particularly evident in Edlington where the UDP employment site to the north east of Broomhouse Lane Industrial Estate obtained planning permission for residential development resulting in the remaining industrial estate being constrained by existing other uses and Green belt. 4.93 As referred to in our response to Policies 2 and 3, it is considered necessary to allocate additional employment sites in the west of the borough to provide sufficient choice and flexibility to existing businesses in the area. The presence of employment uses and businesses in the main towns and service towns and villages to the west of the borough play a significant role in the sustainability of these deprived areas. It is therefore important to provide sufficient land for choice, flexibility and churn in these areas to maintain the strong, sustainable and cohesive communities as recognised in the overall strategy.

Response:

Please see the ‘Site Selection Methodology’ for the reasoning for sites being selected for allocation or rejected. The sites proposed for allocation are the ones (in the Councils Local Plan process) selected to be the most deliverable, marketable and sustainable to meet the forecast need for new sites to support jobs growth and economic ambitions. The forecast land requirement is based on work undertaken by Peter Brett Associates (see evidence base) that looked at potential jobs growth across the Borough (detailed to 38 employment type sectors). From the forecast job numbers a land requirement was calculated. This calculation included additional land for Choice, Churn and Other uses to build in flexibility (see - Employment land Needs Assessment 2019 update for a more in depth explanation of the land calculation)
We support the requirement that the sites allocated for Housing development will be developed in accordance with the Development Requirements set out in Appendix 2. These Development Requirements will provide certainty to both developers and to the local communities precisely what will and will not be permitted on each site. By alerting potential developers of the considerations for each site, they will assist in delivering sustainable development.

Response:
Support welcomed
Our position on Policy 6 Housing Allocations, and paras 4.80 to 4.85 on land supply, should be seen in the context of our comments on Policy 3 above. That is to say, we do not find them unsound in themselves, but they would need to be modified to provide for our recommended approach to Policy 3.

Summary:
Position on Policy 6 should be seen in the context of the position on Policy 3. CPRE do not find them unsound in themselves, but they would need to be modified to provide for the recommended approach to Policy 3.

Response:
Policy 3 and 6 are in accordance with each other as drafted
Policy 6 is not considered to be sound as it is not positively prepared or consistent with national policy for the following reasons: The HBF are keen that the Council produces a plan which can deliver against its housing requirement. To do this 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 throughout the plan period. The HBF and our members can provide valuable advice on issues of housing delivery and would be keen to work proactively with the Council on this issue. The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible. The HBF recommends an appropriate contingency (circa 20%) to the overall housing land supply to provide sufficient flexibility for unforeseen circumstances and in acknowledgement that the housing requirement is a minimum not a maximum figure. The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The Council’s assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data. The HBF representations are submitted without prejudice to any comments made by other parties on the deliverability of specific sites included in the overall HLS, 5 YHLS and housing trajectories. However, the HBF do have some concerns about the delivery of homes and seek assurance that the housing requirement will be delivered.

Policy 6 is not considered to be sound as it is not positively prepared or consistent with national policy. 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 throughout the plan period. The HBF recommends that the plan allocates more sites than required to meet the housing requirement as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible. The HBF recommends an appropriate contingency (circa 20%) to the overall housing land supply to provide sufficient flexibility for unforeseen circumstances and in acknowledgement that the housing requirement is a minimum not a maximum figure. The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The Council’s assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data. The HBF representations are submitted without prejudice to any comments made by other parties on the deliverability of specific sites included in the overall HLS, 5 YHLS and housing trajectories. However, the HBF do have some concerns about the delivery of homes and seek assurance that the housing requirement will be delivered.

Response:
The Local Plan does have a buffer due to the housing figures not accounting for a number of matters, including windfalls, delivery beyond the plan period and potential housing at the airport. This matter is discussed more in the Housing Topic Paper.
Plan Period: The plan period runs from 2015 to 2035; however, the plan period for land supply runs from 2018 and, in the case of housing only runs until 2033 (Table 5). This is an unnecessary complication and must be revised to ensure the plan period and supply period run from the same dates. At the current time, the Plan is not considered to be sound because it fails to provide an appropriate strategy in relation to housing supply, contrary to the NPPF (para. 35). Housing Trajectory: The Housing Trajectory set out in Figure 3 confirms that the requirement of 920dpa will not be reached in the final 9 years of the plan period and 550dpa (Standard Method Requirement) will not be achieved for 7 years of the plan period. Indeed, the trajectory drops off to approximately 100 dwellings in the final year. This approach would have the following significant and fundamental harmful issues: - Failure to meet annual housing requirement - the OAN should be a minimum figure to be achieved on an annual basis - this is acknowledged within Appendix 12 of the draft Local Plan which confirms that net dwelling completions will be monitored each year against a target of 920dpa - although as advised in response to Policy 3, the annual requirement should be 1,073 dpa rather than 920dpa, in accordance with the Council's own evidence contained within the PBA report. The Council should therefore be making provision for the delivery of 1,073 dwellings each year throughout the plan period. The Council's proposal to exceed 1,000dpa in the earlier years of the plan does not justify the significant decline in delivery proposed in later years. - Significant Adverse Practical/Economic Effects - the differentiation between the levels of growth sought at the start of the plan period and those in the later years will have significant adverse economic impacts for Doncaster. The dramatic shift from higher levels of provision to under-provision will lead to a significant drop in job availability within the construction industry and a significant decline in economic input from the house building industry in Doncaster in the later years of the plan. The housing delivery strategy must therefore be revised to ensure it sustains growth across the plan period and does not lead to a decline in Doncaster's economy in the later years of the plan. It would be inappropriate for the Council to simply redistribute the housing delivery across the trajectory because this would affect delivery and artificially suppress demand, which would be an unsound approach. Importantly, sites with planning permission have a combined capacity of 9,318 dwellings (draft Plan para. 4.73) and hence it would now be impossible for the council to redistribute and control when these sites are delivered. It is contended that additional sites should be allocated, for the reasons provided elsewhere in Theakston Estates' representation, and that the housing trajectory should be amended to show the delivery of more new homes from 2026/27 onwards. Based on the position as outlined above, the strategy for delivery of housing in Doncaster is not positively prepared and fails to support growth, and hence the Plan is not sound. It is clear therefore that the delivery strategy must be revised and the Council must allocate additional sites for housing, in addition to those currently proposed. Delivery in the Main Urban Area Theakston Estates does not consider that the Plan is sound because of the distribution of the sites identified does not align with the strategy in draft Policy 3 to direct "at least 50% of new homes" to the MUA. Indeed, there would be a shortfall against this figure. Policy 6 provides details of the sites with planning permission and the allocations which will deliver the housing requirement provided in Policy 3. Delivery between 2015 -2018 Between 2015 - 2018 the following has been delivered: Settlement: Main Urban Area 1st April 2015 - 31st March 2016 (net): 459 (44.8%) 1st April 2016 - 31st March 2017 (net): 555 (52.9%) 1st April 2017 - 31st March 2018 (net): 426 (44.8%) Settlement: Borough Total 1st April 2015 - 31st March 2016 (net): 1,025 1st April 2016 - 31st March 2017 (net): 1,440 Total: 11,461). A copy of the summary tables containing these figures is appended to this representation. Although the requirement of Policy 3 for at least 50% of new homes to go in the MUA, between April 2015 to March 2018, only 44.8% of new homes have been delivered in this area. As such there is already an under delivery against the requirement for at least 50% of new homes to be delivered in the MUA. Furthermore, Table 5 advises that the net completions for the first 3 years is 3,400. However, the actual figure (based on the figures contained in the Council's Residential Land Availability Report) is 3,211. There has therefore been 189 fewer completions than the figures provided in Table 5. Housing Allocations in the MUA: The allocation for the next 15 years in the MUA is 7,211 dwellings or 7,441 by the end of the plan period (2035) (para. 16.22). Table H1(B) also identifies that a further 151 dwellings will come forward beyond the plan period. Table 5 identifies that the Allocations plan period supply from Tables H1 and H2 total 16,115. However, the Allocations plan period supply in the MUA is 7,411 which is 46% of the allocations supply, this is less that the requirement that at least 50% of the total is delivered in the MUA. Indeed, 50% of 16,115 is 8,058 (not 7,411) and hence there is a need to allocate at least 647 more dwellings in this area using the current Plan figures. Summary Taking into account the sites that have been delivered between 2015 - 2018 and the allocations up to the end of the plan, it is clear that less than 50% of new homes will be delivered in the MUA. Taking into account the strategy above, as well as Theakston Estates response to Policies 2 and 3, the housing requirement should be 1,073 dpa to reflect the evidence base and 64% of new homes should be delivered in the MUA. Queries: Table 5 advises that there are 585 units with permission as at 1/4/2018 that are not included in the allocation supply. These consist of sites of 5+ units in the Defined Villages and those of 1-4 units throughout the borough. It is not clear how many of these units are located in the MUA. Paragraph 4.74 advises that these sites will help to address the additional 2 years of the plan period requirement. However, if these sites have planning permission, it is likely that the majority of these units will be delivered over the next few years and will not help to address the additional 2 years of the plan period requirement. Policy 3 and paragraph 16.20 provide a target that at least 50% of the Borough total, or 6,805 - 7,315 new houses, are allocated to the MUA. However, it is not clear how these figures have been calculated, as 50% of the overall requirement of 18,400 (between 2015 - 2035) is 9,200, whilst 50% of 13,230 (between 2018 - 2033) is 6,615. The first sentence within paragraph 4.77 refers to the first 15 year period of the plan (2018-2035). However, the period 2018 - 2035 is 17 years rather than 15 years. The approach within the Plan is very confusing as references are made to the
Plan running to both 2033 and 2035. This should be clarified and it should be made clear that the Plan period runs to 2035. Reserve Development Sites Paragraph 4.82 advises that the Reserve Development Sites have a capacity of 1,483, whilst Table H3(A) identifies that of these 749 dwellings lie within the MUA. Paragraph 4.82 states that: "These are sites where there is currently doubt about whether they could be developed in the plan period, due to HS2 Safeguarding Route, and/or where allocations cannot be justified in accordance with a sequential approach to addressing flood risk". This paragraph goes on to advise that new applications will be approved where flood risk sequential and exceptions tests and other development requirements can be satisfactorily addressed. It is also stated that any complications on these sites will contribute to meeting the plan period housing requirement but have not been factored into the housing supply. Our client has fundamental concerns about the inclusion of the Reserved Development Sites in the Plan. On one hand, paragraph 4.82 advises that there is doubt that the sites can be developed and whether allocations can be justified, whilst at the same time this paragraph goes on to support the principle of development on these sites during the plan period, provided sequential and exception tests can be passed. Paragraph 16.22 advises that the "Reserved Development Sites are generally sites that failed the Sequential Test at plan-making stage so any future development proposals on these sites still need to demonstrate a successful pass of the Sequential Test of part of any future application." As these sites are not deliverable/developable they should have no status in the Plan. The NPPF is clear that: "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future)". (para. 155) (Lichfields emphasis) "Development should not be allocated or permitted if there are reasonable available sites appropriate for the proposed development in areas with a lower risk of flooding" (para. 158). (Lichfields emphasis) In this case, there is an alternative site (Land at Scawsby Lane) that is developable and deliverable and which lies within flood zone 1. Importantly, removing a site from the Green Belt is a sound approach rather than delivering new housing in flood zones 2 or 3. This is because the Green Belt is a planning policy designation rather than a physical constraint whereby a built development could have serious safety issues. Our client submits that the Land at Scawsby Lane is a logical and sustainable location to deliver new housing and it would make an important contribution towards meeting the housing need in the MUA. The site extends to around 39 ha and is bound to the north by Green Lane and the Roman Ridge; to the east by existing development off Emley Drive; to the south by Barnsley Road (A635); and to the west by Scawsby Lane. Land to the west of Scawsby Lane is also within our client’s control and is a proposed community parkland which would be delivered as part of the residential development. It is considered that the site could deliver approximately 800 new homes. The site has been assessed in the Doncaster HELAA Update 2017-2018 as being Suitable (but with national policy constraints or physical constraints), Available and Deliverable/Developable with an overall timeframe of 6-10 years. Subject to appropriate consents, our client is confident that delivery could be secured within years 1-5 and have been approached directly by a number of national and regional house builders. The extract from the HELAA Housing Map is provided below. (SEE EMAIL FOR MAP) As the site has been identified as a deliverable and developable site, our client has sought to understand any concerns for developing the site and have responded accordingly. In doing so, we have considered the assessments of the site in the various evidence base documents, including those in the Sustainability Appraisal (August 2019); Green Belt Review; Site Selection and Results report; Heritage Impact Assessment and Archaeological Scoping Assessment. These findings from these assessments are briefly summarised below. The various assessments conclude that there are archaeological constraints to developing the site which relate mainly to the likely presence of a deserted medieval village to the south of the site. There are also heritage considerations due to the presence of the Roman Ridge (Scheduled Monument) to the north and the grade II listed Tudor Cottage and Scawsby Hall to the south. This representation responds to the concerns identified by the Council. Green Belt Review We have also considered the Council’s Green Belt Review (Stage 3 Green Belt sites Re-appraisal - 9 May 2017) which concludes that the site has an "Moderate Case for inclusion in further site selection work". Sustainability Appraisal and Housing & Employment Site Selection Methodology & Results Report The Sustainability Appraisal (August 2019) concludes that: "it is noted that this is a very large site where there would be scope for sensitive site layout and design of a scheme that could avoid areas of archaeological significance whilst still delivering an extension with significant capacity. In conclusion, although the site has been identified as performing the same through the Green Belt Review Phase 3 as other sites at the settlement where being proposed for allocation, there are sites that perform slightly better through the Sustainability Appraisal and sufficient allocations now identified." (Lichfields emphasis) This assessment indicates that the site has been rejected on the basis of the Sustainability Appraisal. It is recognised that the Sustainability Appraisal has assessed a site capacity of 969 homes, whilst our client is proposing a development of approximately 800 homes on this site, which is a smaller site than that assessed in the Sustainability Appraisal. Theakston Estates therefore requests that the Council reassess this site. Indeed, Theakston Estates submitted a representation in response to the 'Doncaster Local Plan Information Consultation: Draft Policies and Proposed Sites' consultation in October 2018 where further details were provided, including the proposed indicative masterplan and an archaeological report. However, it does not appear that these representations have been considered by the Council in the updated "Sustainability Appraisal of the Doncaster Local Plan 2015-2033: Publication Version" (August 2019). The "Doncaster Local Plan - Housing & Employment Site Selection Methodology & Results Report" (Publication Version, June 2019) has proposed sites at Alverley Lane, Balby (site ref. 115) and Land adjacent to 163 Sheffield Road, Warmworth (site ref: 003) for housing. These sites currently lie within the Green Belt. A comparison of the scores given to these sites in the 2019 Sustainability Appraisal against the score of Land at Scawsby Lane (site ref. 436) is provided in the following table. Site Ref: 115 Site Name: Alverley Lane, Balby Positive Score: 15 Negative Score: 7 Overall Score: 8 Site Ref: 003 Site Name: Land adjacent to 163 Sheffield Road, Warmworth Positive Score: 14 Negative Score: 7 Overall Score: 7 Site Ref: 436 Site Name: Land at Scawsby Lane Positive Score: 18 Negative Score: 9 Overall Score: 9 Overall Score: 8 Over All Score: 8 Overall Score: 8 Over All Score: 5. Archaeological and Heritage Impact Assessment Within the representations identified, we append a report by Northern Archaeological Associates Ltd (NAA) dated October 2018 which assesses the archaeological constraints and identifies mitigation measures to limit the impact of developing the site. This report was submitted with the representations in October 2018. In terms of the Roman Ridge Scheduled Monument, NAA's assessment considers that the section adjacent to the site represents a relatively short section of a much larger monument. The Roman Ridge is generally 1-2m in height and approximately 10m in width and is primarily comprised by a tarmac route with grass verge and/or mixed shrub and tree hedgerow on each side. Therefore, the main character of this section of Roman Road is that of an enclosed corridor contained by hedgerows which retains a sense of rural character and limits views of built development. NAA's assessment considers that the development of the site would have no physical impact on the Scheduled Monument and that any impact upon its setting can be limited through an appropriately designed scheme. The recommended mitigation measures include: Reinforcing planting along those sections of the route where hedgerows are either missing or low; - Applying a buffer zones of at least 10m between the Roman Road and the development line which is consistent with the existing development to the south east of the site; and - Incorporating accessible open space into this buffer zone with access links to the Roman Road. Additionally, interpretation and knowledge panels could also be provided to enhance and further local understanding of the Roman Ridge. Application of the above would enable access and better appreciation of the Scheduled Monument, providing a new public benefit to a section which is not currently publically accessible. NAA's assessment also considered the potential earthwork remains of the deserted medieval village (DMV) and a review of the LiDAR imagery indicates.
that these remains are likely to be present in the southern field which is under pasture. The LiDAR imagery indicates that in the southern field the remains are likely to be a combination of crofts and tofts, road and ridge and furrow. Any cropmarks which have been identified are common across this part of South Yorkshire and are not considered to be a constraint to development. NAA’s recommended mitigation strategy is to exclude the southern field from the development, given the reasonable survival of the DMV, and retain this as an area of publicly accessible open space within the development. The development should also minimise tree planting, drainage infrastructure and other works which could result in ground disturbance. The suggested mitigation would mean that this area would form an attachment to the green corridor along Barnsley Road, creating new opportunities to link paths through the development, community parkland and to the north and onto the Roman Ridge bridleway. This would enhance permeability and access between existing public footpaths and the various heritage and community assets in the area. Lichfields has considered the potential impact of the development on above ground heritage assets. Tudor Cottage (Listed Grade II) dates from the second quarter of the nineteenth century. The cottage faces across Scawsby Lane to the ancillary farm buildings associated with Scawsby Hall. It is likely that it was built as farm accommodation (possibly for a farm manager). It does not appear to have been associated with any particular neighbouring buildings or land use with its strongest association being with the building to the south of Barnsley Road. Scawsby Hall (Listed Grade II) is a mid-seventeenth-century farmhouse set back from Barnsley Road behind a sizeable front garden and is associated with a number of ancillary buildings now converted from farm use to a pub and restaurant. By retaining the southern fields as public open space, Scawsby Hall and Tudor Cottage will both be separated from proposed development. The wider site to the north of these heritage assets does not contribute to the significance of these listing buildings and, therefore, developing this part of the site will not harm their significance. It is therefore concluded that through careful masterplanning an acceptable scheme can be delivered that is sensitive to the historic environment. As such, archaeology and heritage are not issues that preclude the wider site development and Theakston Estates contend that the negative score in the Sustainability Appraisal against 'Heritage Impacts' should be amended to a neutral observation. Pollution to Surface Water Bodies The Sustainability Appraisal, at Table 8.3, also identifies potential significant negative effects relating to "Pollution to Surface Water Bodies". Other elements of the Sustainability Appraisal do not reference this effect. Therefore, as stated in the Theakston Estate representations in October 2018, it is suspected that there is an error with the assessment as it is unclear how the development would result in pollution to surface water bodies. Furthermore, the only water body identified on the Environment Agency’s map would be located in the southern field which is to be excluded from the development. There is a field drain which runs through the site in an west to east direction however this is dry for the majority of the year. In addition, any concerns would be dealt with at the planning application stage and the required mitigation measures would be secured by planning conditions. The assessment should be amended to a neutral observation. Indicative Masterplan We have attached an indicative masterplan for the site, which includes an indicative layout for the site east of Scawsby Lane which could deliver around 800 houses together with a new school and other community shops and facilities. The proposals also include a community parkland to the west of the Scawsby Lane. The indicative masterplan was discussed in the representations submitted to the Council in October 2018. As detailed in the Council’s Settlement Background Paper (2018), "there is a deficiency in open space (be it formal, informal, allotments, public parks, woodlands and nature conservation areas)" and that additional housing delivery “without improving existing open spaces or delivering new open space, must be avoided to prevent this from worsening”. The paper also states that "sport and recreation activity is below the national average, with the borough facing relatively high levels of obesity and ill health”. The community parkland on adjacent land to the west of Scawsby Lane will include new sports facilities; a woodland play area and trails; allotments and new habitats for wildlife. This represents a significant benefit and aligns with the NPPF (February 2019) which states that plans: "should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land". (Lichfields' emphasis) (para. 138) This would directly support efforts to address the current issues relating to open space deficiencies and obesity rates identified in the Settlement Background Paper. It also responds directly to the Local Plan objectives including no. 13 which seeks to “provide new or improved health, sport and recreational facilities and green infrastructure to create quality communities and address deficits in provision”. As part of the proposals to east of Scawsby Lane, the masterplan includes provision for a new school community and hub with shops and facilities. As shown on the plan, the proposals could also deliver additional education benefits by providing land for playing fields or car parking to support the operation of existing schools located to the south of Barnsley Road. These recommendations identified in the assessments by NAA and Lichfields have been also been incorporated into the indicative masterplan. The masterplan clearly demonstrates how the southern field can be retained as public open space which would limit any impact of the development on the DMV archaeological remains whilst also maintaining the setting to the nearby Grade II listed buildings. The proposed access road into the development would be taken from Barnsley Road, although its exact route will be informed by further archaeological investigation to limit any impact on below ground remains. Along the northern boundary, the Roman Ridge would not be affected by the development and the proposed masterplan incorporates a buffer zone together with additional landscaping to limit any impacts to its setting. Notwithstanding this, the assessments by Lichfields and NAA recommend that links to the Roman Ridge are included to enable the historic route to contribute further to the network of pedestrian and cycle access. Overall, whilst the locality has a number of heritage assets associated with it, the masterplan demonstrates that consistency with the conservation and enjoyment of the historic environment. The heritage assets will be incorporated into the wider proposals in a way which is consistent with their conservation, which contributes to the distinctiveness of the area and which allows them to contribute to the wider benefits to the proposals. Re-Assessment of the Land at Scawsby Lane To ensure a sound Plan, Theakston Estates request that the Council re-assesses the site within their Sustainability Statement and take the following into account. The negative scores against 'heritage impacts' and 'pollution to surface water bodies' should be changed to a neutral score in light of the information provided earlier in this representation. These two changes would amend the total negative score to 8 and the overall score to 7, which is the same overall score as site reference 003. Importantly, in light of the proposals shown on the indicative masterplan, the Sustainability Appraisal scoring should be amended as follows: - 'Heritage Assets' should be changed from a negative to a positive score; - the proposals include the provision of community shops and other facilities; - 'Biodiversity - should be changed from a negative to a positive score given that the proposals include the provision of extensive wildlife habitats which will deliver a substantial net gain; and - 'Access to Public Open Space' should be changed from a single to a double positive score given that a most extensive area of community parkland is proposed on adjacent land which is likely to include new sports facilities, a woodland play area and trails, allotments and wildlife habitats. Taking into account these changes, together with the above in relation to heritage impacts and water pollution, the sustainability score should be amended to a positive score of 14 and a negative score of 5. This provides a total score of 9, which is higher than the other two Green Belt sites which are proposed to be removed from the Green Belt and allocated for housing. The scoring in the Sustainability Appraisal is therefore wrong and the Plan has been based on false evidence, contrary to the NPPF. Summary Scawsby Lane (ref. 436) is a logical and sustainable location to deliver housing growth and our client requests that it is allocated in the Plan and on the Policies Map for housing development. The provision of additional community facilities on the site together with the proposed community woodland on land to the west of Scawsby Lane means that this is the only site which can deliver a substantial package of benefits in line with paragraph 138 of the NPPF (February 2019). The overall development package has a higher sustainability score that the other two Green Belt sites which have been assessed through the Sustainability Appraisal are proposed to be allocated for housing. The scoring in the Sustainability Appraisal is therefore wrong and the Plan has been based on false evidence, contrary to the NPPF. PROPOSED CHANGE As explained in response to question 6, the strategy for the delivery of housing in
Doncaster has not been positively prepared and fails to support growth. To ensure a sound plan that is consistent with the NPPF (February 2019) (para. 35), the delivery strategy must be revised and additional sites for housing must be allocated, in addition to those currently proposed, to ensure that a minimum annual delivery figure of 920 dwellings can be achieved every year (notwithstanding Theakston Estates' response to Policy 3 regarding the need to increase the housing requirement to at least 1,073 dpa). Importantly, it is critical that additional sites are identified within the MUA to ensure that the housing allocations in this area reflect the requirement of Policy 2 which is to deliver at least 50% of new homes in the MUA (notwithstanding Theakston Estates’ response to Policy 2 that this figure should be 64%). The approach to including the Reserve Development Sites in the Plan is fundamentally flawed and cannot be justified, especially given that some of these sites are subject to flood risk. As these sites are not deliverable / developable they should have no status in the Plan. To ensure a sound Plan that provides the most appropriate strategy and accords with the NPPF (paragraphs 35, 155 and 158), references to these sites must be removed and other less constrained and more suitable sites should be allocated. The Land at Scawsby Lane is a logical and sustainable location to deliver new housing and as such should be allocated for this use within the Plan and on the Policies Map. This site was previously proposed for housing but was rejected on archaeological grounds. However, as demonstrated in response question 6, this matter has now been addressed and the site is available, deliverable and developable for a residential development. Importantly, the Council's scoring of the site in the Sustainability Appraisal is incorrect any re-assessment will identify that it performs better than the two Green Belt sites which are proposed for housing.

Summary:
The plan period is 20 years (2015 - 35), but the supply is only 2018 - 2035 - an unnecessary complication. The plan must be revised to ensure these match. It is currently unsound as it fails to provide an appropriate strategy in relation to housing supply. The housing trajectory shows that 920 dpa will not be reached in the final 9 years of the plan period, and 550 dpa (standard methodology requirement) will not be achieved for 7 years of the plan period, and the trajectory drops to approximately 100 dwellings in the final year. This creates fundamental harmful issues: - Failure to meet the housing requirement, which should be a minimum of 920 dpa as per the draft plan (or, as advised, 1,073). Provision should be made for 1,073 dpa throughout the plan period, and proposing to exceed the requirement in early years does not justify the decline in later years. - Significant adverse practical / economic effects: the differentiation between levels of growth at the beginning and end of the plan period will have significant economic impacts on Doncaster. The shift from higher levels of provision to under - provision will lead to a significant drop in job availability within construction and a significant decline in economic output from the construction industry and house building industry in Doncaster in the later years of the plan. The delivery strategy must be revised to ensure it sustains growth across the plan period and doesn’t lead to decline in Doncaster’s economy in the later years of the plan. It would be inappropriate to redistribute the delivery across the trajectory as this would affect delivery and artificially suppress demand, which would be unsound. Sites with permission have 9,318 dwellings and it would be impossible for the council to redistribute and control when these sites are delivered. Instead, additional sites should be allocated, and the trajectory amended to show higher delivery from 2026/27 onwards. Based on this the plan is unsound at the strategy must be revised, and more sites must be allocated. Despite the requirement for 50% of new homes in the urban area, only 44.8% has been delivered in the area 2015 - 18. As such, there is already under delivery against the requirement. Table 5 says delivery is 3,400, in the first 3 years, but the actual figures according to the RLA is 3,211 or 189 fewer than stated. The 15 year allocation in the urban area is 7,211, or 7,411 by 2035. Table 5 notes the allocations plan period supply from tables H1 and H2 is 16,115, however the supply in the urban area is 7,411, which is 46% of the allocations supply (less than the 50% allocated to the urban area). 50% of 16,115 is 8,058 and therefore 647 more dwellings are needed according to plan figures. This means that the annual requirement should be 1,073 dpa and 64% of homes should be delivered in the urban area. Queries: - Table 5 advises there are 585 units with permission not included in the supply (defined villages and permissions with 1 - 4 units. These are stated to help supply in the last two years, however if these are delivered now, they will not help later in the plan period. - Policy 3 and paragraph 16.20 provide a target of 50% of the borough total or 6,805 - 7,315 new houses are allocated in the urban area, however it is not clear how this has been calculated (50% 2015 - 35 is 9,200 and 50% 2018 - 33 is 6,615). The first sentence of 4.77 refers to 15 years 2018 - 35, however this is 17 years. The approach is very confusing and needs clarifying. - There are concerns about the Reserve Development Sites in the Plan. On one hand, para. 4.82 advises that there is doubt they can be developed or allocations justified, whereas the paragraph goes on to support the principle of development on these sites, subject to sequential and exception tests. As these sites are not deliverable / developable they should have no place in the plan. Para. 155 and 158 of the NPPF are clear on flood risk. Scawsby Lane (436) is logical and sustainable. It was rejected on archaeological grounds. Given its availability, no reserve site should pass a sequential test in the Local Plan. Site 436: - Should be removed from the Green Belt - logical and sustainable that can help meet urban area housing needs - Land to west by Scawsby Lane is also in the same ownership and proposed as a country park alongside residential development for 800 homes. - The HELAA notes the site is deliverable and developable within 6 - 10 years overall. The client is confident delivery could be secured in years 1 - 5. The client has sought to understand concerns about the site and acted accordingly and has read relevant DMBC reports: The Sustainability Appraisal: indicates that the site was rejected on the basis of this report. The capacity assessed in this report (969) is actually now approx. 800 homes and so Theakston Estates request the report is re-done. Previous information submitted to the Council in 2018 does not appear to have been considered in the published Sustainability Appraisal. Two urban area Green Belt sites have been promised: 033 and 115. Below are the compiled scores: Site Ref: 115 Site Name: Alverley Lane, Balby Positive Score: 15 Negative Score: 7 Overall Score: 8 Site Ref: 003 Site Name: Land adjacent to 163 Sheffield Road, Warmworth Positive Score: 14 Negative Score: 7 Overall Score: 7 Site Ref: 436 Site Name: Land at Scawsby Lane Positive Score: 13 Negative Score: 8 Overall Score: 5 With regards to archaeology, a report is appended which assesses the archaeological constraints and identifies mitigation measures to limit development impacts. Furthermore, it is considered the Roman Ridge in this location an enclosed corridor enclosed by hedgerows and therefore retains rural character and limits the views of development. The appended report considers development would not physically impact on this, and impacts can be mitigated through design such as reinforcing planting, applying buffer zones between development and the Roman Ridge, and incorporating open space in the buffer zone. Knowledge panels could also be provided to enhance the local understanding of the Roman Ridge - a new public benefit. The assessment also shows that there is likely a deserted medieval village with potential remaining earthworks in the southern field. LiDAR imagery indicates that in the southern field the remains are likely to be a combination of crofts and tents, road and ridge and furrow. Any crooks which have been indicated are common across this part of South Yorkshire and are not considered to be a constraint to development. The report recommends this is excluded from development and made open space, which would help facilitate a green corridor along Barnsley Road with better access and permeability. The proposals will also ensure the listed buildings are separated from the development and the wider site does not impact on these buildings, nor would development harm their significance. It is considered careful master planning can help manage heritage impacts, and therefore the Sustainability score for heritage impacts should be neutral. There is also an error in the report related to the conclusion that the development will have a negative impact on pollution to surface water bodies - it is unclear how. Any concerns would be dealt with at application stage, the assessment should again be neutral. An indicative masterplan is attached showing 800 new homes, a new school and other community shops and facilities, as well as a community park land to the west of Scawsby Lane. This would help address deficiencies in open space highlighted in the Settlement Background Paper. The parkland would include sports facilities, woodland play, allotments and wildlife habitats. This is a significant benefit which aligns with NPPF para. 138, the Settlement Background Paper and Local
Plan Objective 13. Playing fields could also deliver additional education benefit by providing provision or car parking to support the existing schools on Barnsley Road. The masterplan details how this can all be achieved. To ensure a sound plan, Theakston Estate recommends the site should be reassessed in the Sustainability Appraisal to change heritage impacts and pollution to surface water bodies to neutral (bringing the site in line with 033). Scoring should also be amended for 'Access to existing centre', 'biodiversity', and 'access to public open space' as the site can provide outcomes which are not currently recognised. This would give the Sustainability Appraisal a score of 9 - higher than the other Green Belt sites. The current scoring is wrong and based on false evidence - contrary to NPPF. Proposed change: Site 436 should be allocated in the Plan, and the housing requirement for the plan period, the share for the urban area, the use of reserve development sites and the Sustainability Appraisal are all incorrect.

Response:
See response to the comments made by the Representation to Policies 2 and 3. Sites have been selected in line with the Site Selection Methodology. Responses to Representations in respect to the Sustainability Appraisal are set out in the Addendum to the SA Report published at Submission.
Objection is made to the proposed housing requirement for Sprotbrough Village (identified as that part of Sprotbrough west of the A1(M)) from the rest of Sprotbrough and the Doncaster Urban Area and allocating new housing to this part of Sprotbrough inevitably meant any new housing would have to be in the Green Belt, since all the land surrounding the area is Green Belt. Thus the only reason for any encroachment into the Green Belt was because DMBC planners had decided to divide Sprotbrough into two areas and allocate 1.05% of new housing to the area west of the A1(M) on the basis of its "share" of Doncaster's overall housing requirements and not on any identified need in that part of Sprotbrough. The Parish Council is unaware if any attempt has ever been made to make an objective assessment of Sprotbrough's housing needs. These are not "exceptional circumstances" in accordance with the National Planning Policy Framework. On the contrary, they arise as a result of a deliberate decision to develop into the Green Belt which the Parish Council believe is totally unnecessarily, even though there are plenty other suitable areas of land around Doncaster. According to the council's Housing and Economic Land Availability Assessment (HELAA) "there is no shortage of suitable and deliverable/developable land in the borough to meet the emerging Local Plan's development needs for the plan period 2015 - 2032." The Parish Council strongly believes that there is no justification for more houses to be built which encroach into the Green Belt around this area. Any new housing in the area would add substantially to the existing infrastructure problems.

Summary:

Objection is made to the proposed housing requirement for Sprotbrough Village (identified as that part of Sprotbrough west of the A1(M)) from the rest of Sprotbrough and the Doncaster Urban Area and allocating new housing to this part of Sprotbrough inevitably meant any new housing would have to be in the Green Belt, since all the land surrounding the area is Green Belt. Thus the only reason for any encroachment into the Green Belt was because DMBC planners had decided to divide Sprotbrough into two areas and allocate 1.05% of new housing to the area west of the A1(M) on the basis of its "share" of Doncaster's overall housing requirements and not on any identified need in that part of Sprotbrough. The Parish Council is unaware if any attempt has ever been made to make an objective assessment of Sprotbrough's housing needs. These are not "exceptional circumstances" in accordance with the National Planning Policy Framework. On the contrary, they arise as a result of a deliberate decision to develop into the Green Belt which the Parish Council believe is totally unnecessarily, even though there are plenty other suitable areas of land around Doncaster. According to the council's Housing and Economic Land Availability Assessment (HELAA) "there is no shortage of suitable and deliverable/developable land in the borough to meet the emerging Local Plan's development needs for the plan period 2015 - 2032." The Parish Council strongly believes that there is no justification for more houses to be built which encroach into the Green Belt around this area. Any new housing in the area would add substantially to the existing infrastructure problems.

Response:

It has been deemed that there is a clear separation given the village is separated by both Green Belt and the A1. Sprotbrough Village is a sustainable location in its own right and has a relatively modest housing target for which a suitable site has been found. Exceptional Circumstances are explained in the Green Belt Topic Paper; it is not true to say that a housing requirement means Green Belt will be released (as shown at Mexborough), rather in the case of the site at Sprotbrough it was deemed justifiable. It should also be noted that were Sprotbrough Village part of the Main Urban Area, then the housing requirement would increase for the urban area and this site may still be a suitable option when considered amongst other Main Urban Area sites.
Tests of Soundness:

Comment:

3.57 The development requirements for the site as set out in Appendix 2 are generally considered to be reasonable and appropriate. However, there is no reference within the information to how the required education contribution will be calculated or what the green infrastructure and public open space requirements will be for the site. Recommendations

3.58 Details of how the required education contribution will be calculated should be included within the requirements information, or, if our recommendation is implemented, a reference to Policy 66 / the relevant supplementary planning or CIL document should be included. 3.59 Details of what the green infrastructure and public open space requirements will be for the site should be included within the requirements information, or, if our recommendation is implemented, a reference to Policies 27, 29 and 30 should be included. Justification

3.60 The development requirements set out in Appendix 2 are inadequately clear.

Summary:
The developer requirements in Appendix 2 are generally considered to be reasonable and appropriate, however there should be clear reference as to how the education contribution will be calculated, and what the green infrastructure and open space requirements are for the site. Details of how the required education contribution will be calculated should be included within the requirements information, or, if our recommendation is implemented, a reference to Policy 66 / the relevant supplementary planning or CIL document should be included. Details of what the green infrastructure and public open space requirements will be for the site should be included within the requirements information, or, if our recommendation is implemented, a reference to Policies 27, 29 and 30 should be included. As drafted the requirements are inadequately clear.

Response:

Policies in the local plan provide clarity on developer contributions, such as public open space. Sites have been assessed by colleagues in Education to determine where there are likely to be a need for contributions to increase capacity. A standard Department for Education formula is used.
Objection is made to Table 5 of the Plan that sets out the housing requirement. The text indicates that the requirement is variable between the bottom and top of the requirement range, but the table sets out the requirement at the top of the range. It is therefore unclear. The Plan should allocate sites and plan for the top of the range figure, and allocate sufficient land to meet the remaining requirements for the 17 years of the Plan. The table as drafted allocates land for 15 years rather than 17 years and appears to under allocate the residual requirement which is 15,000 new homes. The supply figures in the table do not reconcile with the figures at paragraph 16.21. Some of this issue relates to the fact that sites with planning permission are also allocated. Allocating sites with permission is confusing the plan and sites with permission do not need to be specifically allocated. The Plan should be clear about what the contribution of the sites with Planning Permission is and how this number is discounted, and what are the new allocations. The Plan is imprecise as drafted.

Summary:
Objects to Table 5 - indicates the requirement is variable between the bottom and top of the range but the table sets out the requirement at the top of the range and is therefore unclear. Should allocate sites and plan for the top of the range and enough sites for the remaining 17 years of the plan period rather than for the 15 years and under allocates the residual requirement of 15,000 new homes. The supply figures in Table 5 do not reconcile with the figures at para 16.21. Some of the issues relates to the large number of sites with permission being allocated which confuses the plan and such sites do not need to be allocated. The Plan should be clear about contribution from permissions and new allocations.

Response:
Believe the table sets out the position clearly. Table 5 does not correlate with para. 16.21 as the former is a borough wide total and the latter is only related to the Main Urban Area. If every settlement delivered at the top of the range there would be an oversupply of housing. They are designed to allow some areas to deliver more or less based on local circumstances and site availability, whilst ensuring that overall the borough meets its housing targets. This has been achieved. The plan delivers enough housing to meet it’s 20 year requirement, and can show how it will deliver enough housing for the 15 year period 2018 - 33 and the remaining 2 years, as well as demonstrate supply via completions for the years 2015 - 18. Chapter 16 and the Housing Topic Paper show the sites which are permissions, and those which are non-permissioned allocations.
Reason: We act for a number of major land owners in the Doncaster area, we have detailed knowledge of the sites and the planning history of the Borough. We have previously been involved with the Core Strategy Plan and with the Examination of the draft Sites and Policies DPD. Our knowledge of the various land parcels, ownerships, the strategic land position and site specific details, means that we have information to inform the debate regarding the overall housing requirement and the specific allocation of sites which will assist the examination.

Area: Chapter 4: Strategic Approach

Policy: Policy 6: Housing Allocations

Tests of Soundness: Positively prepared Justified Effective Consistent with national Legally Compliant

Comment:

It is proposed to use the bottom of the range of the housing requirement in calculating the five year supply, equating to the base requirement only. The Plan however is predicated on delivering land to meet the base requirements and the economic uplift. It is not the right approach to calculating a five year housing land requirement to ignore part of the housing requirement and base the supply on a partial element of the requirement. This will give a false picture of the five year land supply required to deliver the housing needs identified in the Local Plan. The plan should be amended to make it clear that the five year supply is based on the full housing requirement of the Local Plan. PROPOSED CHANGE 6. Provide a housing land supply calculation based on the full housing requirement. As explained in detail above.

Summary:

Should not calculate SYHLS using the bottom of the range which ignores part of the housing requirement and gives a false picture of the 5-year land supply required to deliver housing need identified in the plan. Should be amended to make clear it will be calculated based on the full housing requirement.

Response:

Both the use of a range and using the Standard Methodology figure is supported in Planning Practice Guidance / NPPF.
Comment Ref: C/Policy 6/03431/1/004  
Organisation: Persimmon Homes (Yorkshire) Ltd

Reason: We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Area: Chapter 4: Strategic Approach

Policy: Policy 6: Housing Allocations

Tests of Soundness: 

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Comment: 

In order to ensure that the Council produces a plan which can deliver against its housing requirement 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 required levels. 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. Persimmon Homes can provide valuable advice on issues of housing delivery and would be keen to work proactively with the Council on this issue. It is no use continually promoting growth in locations if there is little or no prospect of them being brought forward. There are instances in the plan where historic allocations have been carried forward where delivery is questionable. This policy should allocate more sites than the housing requirement in order to provide a buffer sufficient to provide for likely under-delivery on a proportion of sites. This would be consistent with national policy as it would be positively prepared. A sufficient buffer (of around 20%) would allow for unforeseen circumstances on some sites including under delivery from major strategic sites and for the potential failure of delivery on a number of sites.

Summary: 

To ensure that the Council produces a plan which can deliver against its housing requirement 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 required levels. 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. Persimmon Homes can provide valuable advice on issues of housing delivery and would be keen to work proactively with the Council on this issue. It is no use continually promoting growth in locations if there is little or no prospect of them being brought forward. There are instances in the plan where historic allocations have been carried forward where delivery is questionable. This policy should allocate more sites than the housing requirement in order to provide a buffer sufficient to provide for likely under-delivery on a proportion of sites. A sufficient buffer (of around 20%) would allow for unforeseen circumstances on some sites including under delivery from major strategic sites and for the potential failure of delivery on a number of sites.

Response: 

Assessment of the ability of sites to deliver their housing has been undertaken and work is explained in the HELAA, the Site Selection Methodology and the Viability Report. There may be a number of reasons UDP allocations have not come forward but are re-allocated, including the fact they may be Council owned and never marketed. As set out in the Housing Topic Paper, a buffer of additional sites is unnecessary as the housing calculations do not factor in a number of additional sources of supply, such as windfalls, small sites of 1 - 4 units, housing delivering beyond the plan period and the prospect of additional housing at the airport (amongst other sources). These thus create a buffer.
Comment: We act for a number of major land owners in the Doncaster area, we have detailed knowledge of the sites and the planning history of the Borough. We have previously been involved with the Core Strategy Plan and with the Examination of the draft Sites and Policies DPD. Our knowledge of the various land parcels, ownerships, the strategic land position and site specific details, means that we have information to inform the debate regarding the overall housing requirement and the specific allocation of sites which will assist the examination.

Area: Chapter 4: Strategic Approach

Policy: Policy 6: Housing Allocations

Tests of Soundness: Positively prepared, Effective, Legally Compliant

Comment:

It is proposed to use the bottom of the range of the housing requirement in calculating the five year supply, equating to the base requirement only. The Plan however is predicated on delivering land to meet the base requirements and the economic uplift. It is not the right approach to calculating a five year housing land requirement to ignore part of the housing requirement and base the supply on a partial element of the requirement. This will give a false picture of the five year land supply required to deliver the housing needs identified in the Local Plan. The plan should be amended to make it clear that the five year supply will be based on the full housing requirement of the Local Plan. PROPOSED CHANGE 5. Provide a housing land supply calculation based on the full housing requirement. As explained in detail above.

Summary:

Objects to the housing requirement being expressed as a range with the bottom being used to calculate 5YHLS; it is not the right approach to base on a partial element of the requirement and gives a false picture of the 5YHLS required to deliver housing needs identified in the Local Plan. Proposed change - amend to make clear 5YHLS will be based on full housing requirement.

Response:

Both the use of a range and using the Standard Methodology figure is supported in Planning Practice Guidance / NPPF.
2.90 The development requirements for new development sites are set out in Appendix 2 of the draft plan. However, there is no reference within the plan as to how the required education contribution will be calculated or what the precise green infrastructure and public open space requirements will be for the site. We object to this approach. Recommendations

2.91 Details of how the required education contribution will be calculated should be included within the requirements information, or, if our recommendation is implemented, a reference to Policy 66 / the relevant supplementary planning or CIL document should be included.

2.92 Details of what the green infrastructure and public open space requirements will be for the site should be included within the requirements information, or, if our recommendation is implemented, a reference to Policies 27, 29 and 30 should be included.

Justification

2.93 The development requirements set out in Appendix 2 are likely to be ineffective and have a directly detrimental impact on viability if clarity of contributions expected is not set out within the Local Plan or supplementary planning documents. This undermines the soundness of the Local Plan.

Response:

Policies in the local plan provide clarity on developer contributions, such as public open space. Sites have been assessed by colleagues in Education to determine where there are likely to be a need for contributions to increase capacity. A standard Department for Education formula is used.
Comment Ref: /Table 5/05187/1/004
Attend Examination: Attend Hearing
Reason: We act for a number of major land owners in the Doncaster area, we have detailed knowledge of the sites and the planning history of the Borough. We have previously been involved with the Core Strategy Plan and with the Examination of the draft Sites and Policies DPD. Our knowledge of the various land parcels, ownerships, the strategic land position and site specific details, means that we have information to inform the debate regarding the overall housing requirement and the specific allocation of sites which will assist the examination.
Area: Chapter 4: Strategic Approach
Policy: Policy 6: Housing Allocations
Tests of Soundness: Positively prepared Effective Legally Compliant
Justified Consistent with national
Comment:
Objection is made to Table 5 of the Plan that sets out the housing requirement. The text indicates that the requirement is variable between the bottom and top of the requirement range, but the table sets out the requirement at the top of the range. It is therefore unclear. The Plan should allocate sites and plan for the top of the range figure, and allocate sufficient land to meet the remaining requirements for the 17 years of the Plan. The table as drafted allocates land for 15 years rather than 17 years and appears to under allocate the residual requirement which is 15,000 new homes. The supply figures in the table do not reconcile with the figures at paragraph 16.21. Some of this issue relates to the fact that sites with planning permission are also allocated. Allocating sites with permission is confusing the plan and sites with permission do not need to be specifically allocated. The Plan should be clear about what the contribution of the sites with Planning Permission is and how this number is discounted, and what are the new allocations. The Plan is imprecise as drafted. Table 5 Housing land supply calculations. It is proposed to use the bottom of the range of the housing requirement in calculating the five year supply, equating to the base requirement only. The Plan however is predicated on delivering land to meet the base requirements and the economic uplift. It is not the right approach to calculating a five year housing land requirement to ignore part of the housing requirement and base the supply on a partial element of the requirement. This will give a false picture of the five year land supply required to deliver the housing needs identified in the Local Plan. The plan should be amended to make it clear that the five year supply is based on the full housing requirement of the Local plan. PROPOSED CHANGE 3. Provide consistency between the housing requirement calculations, the supply and the allocated sites. 4. Redistribute the full housing requirement to include the service towns and villages. 6. Provide a housing land supply calculation based on the full housing requirement. As explained in detail above.
Summary:
Objects to Table 5 - indicates the requirement is variable between the bottom and top of the range but the table sets out the requirement at the top of the range and is therefore unclear. Should allocate sites and plan for the top of the range and enough sites for the remaining 17 years of the plan period rather than for the 15 years and under allocates the residual requirement of 15,000 new homes. The supply figures in Table 5 do not reconcile with the figures at para 16.21. Some of the issues relates to the large number of sites with permission being allocated which confuses the plan and such sites do not need to be allocated. The Plan should be clear about contribution from permissions and new allocations.
Response:
Believe the table sets out the positon clearly. Table 5 does not correlate with para. 16.21 as the former is a borough wide total and the latter is only related to the Main Urban Area. If every settlement delivered at the top of the range there would be an oversupply of housing. They are designed to allow some areas to deliver more or less based on local circumstances and site availability, whilst ensuring that overall the borough meets its housing targets. This has been achieved. The plan delivers enough housing to meet it’s 20 year requirement, and can show how it will deliver enough housing for the 15 year period 2018 - 33 and the remaining 2 years, as well as demonstrate supply via completions for the years 2015 - 18. Chapter 16 and the Housing Topic Paper show the sites which are permissions, and those which are non-permissioned allocations.
Comment Ref: C/Policy 6/05289/1/004

Name: Persimmon Homes

CUSREF: 05289

Date: 26/09/2019

Organisation: Persimmon Homes

Representing: Persimmon Homes

Comment Ref: C/Policy 6/05289/1/004

Attend Examination: Attend Hearing

Reason: We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Area: Chapter 4: Strategic Approach

Policy: Policy 6: Housing Allocations

Tests of Soundness: 

Comment:

In order to ensure that the Council produces a plan which can deliver against its housing requirement 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 required levels. 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. Persimmon Homes can provide valuable advice on issues of housing delivery and would be keen to work proactively with the Council on this issue. It is no use continually promoting growth in locations if there is little or no prospect of them being brought forward. There are instances in the plan where historic allocations have been carried forward where delivery is questionable. This policy should allocate more sites than the housing requirement in order to provide a buffer sufficient to provide for likely under-delivery on a proportion of sites. This would be consistent with national policy as it would be positively prepared. A sufficient buffer (of around 20%) would allow for unforeseen circumstances on some sites including under delivery from major strategic sites and for the potential failure of delivery on a number of sites.

Summary:

To ensure that the Council produces a plan which can deliver against its housing requirement 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 required levels. 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. There are instances in the plan where historic allocations have been carried forward where delivery is questionable. This policy should allocate more sites than the housing requirement in order to provide a buffer sufficient to provide for likely under-delivery on a proportion of sites. A sufficient buffer (of around 20%) would allow for unforeseen circumstances on some sites including under delivery from major strategic sites and for the potential failure of delivery on a number of sites.

Response:

Enough sites have been included to meet the housing requirement over the plan period. As set out in the Housing Topic Paper, a buffer of additional sites is unnecessary as the housing calculations do not factor in a number of additional sources of supply, such as windfalls, small sites of 1 - 4 units, housing delivering beyond the plan period and the prospect of additional housing at the airport (amongst other sources). These thus create a buffer.
We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

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Enough sites have been included to meet the housing requirement over the plan period. As set out in the Housing Topic Paper, a buffer of additional sites is unnecessary as the housing calculations do not factor in a number of additional sources of supply, such as windfalls, small sites of 1 - 4 units, housing delivering beyond the plan period and the prospect of additional housing at the airport (amongst other sources). These thus create a buffer.
Comment: As highlighted in the Doncaster Settlement Profiles (2018): "despite having the smallest population of the Service Towns and Villages, Finningley scores well for service provision, with three primary and three secondary services found here" (page 67) (Emphasis added). This further supports the identification of the site for sustainable residential development out with the existing restrictive development limit. Additionally, within this supporting evidence document (the Doncaster Settlement Profile), our client’s land is identified as a ‘Housing Site Option’ within the Countryside on the edge of the Finningley settlement. The site was rejected for housing as the Council’s analysis stated it is “greenfield and countryside and would form an extension to the settlement. Given Finningley can meet most of its housing target via permissions (being just 5 short of its target of 55), it is not considered that such an extension into the countryside is necessary, nor can it be justified.” However, Swan Homes Ltd contests this as much of the site is in fact brownfield land. In addition, as discussed above, the DLP’s ambition to fail to meet its targets for Finningley is not sound within the bounds of the NPPF, and therefore cannot be used here to justify the rejection of this site which would help the DLP meet these targets for Finningley. Within the Settlement Audit, Finningley scores well for having a primary school, GP Service, pharmacy, POS and a secondary bus service. Despite not having a 'Town Centre' as defined in the settlement audit, it has a number of services and amenities distributed across the settlement. It should also be noted that a train station has been anticipated for the neighbouring Robin Hood Airport, which would serve Finningley when completed, further enhancing the settlement’s connectivity. The NPPF (paragraph 78) encourages linkages between smaller settlements and villages identifying that housing should be located where it will enhance or maintain the vitality of rural communities, especially where this will support local services and acknowledges that development in one village may support services in nearby villages. In the DLP, the settlement of Finningley is described as being part of a cluster of villages with Finningley, alongside Auckley-Hayfield Green, being described as providing a service function for the other villages. This makes clear that Finningley, within this support network of villages could accommodate further residential development in the area such as our client’s proposed site.

Summary: Comments on the Finningley settlement profile. Settlement profiles indicate that Finningley scores well and could support additional homes.

Response: Finningley is the smallest settlement with an allocated supply and also has the lowest level of service provision out of the settlements earmarked for allocations. It therefore has a modest housing target commensurate with it’s size and service levels, and can largely meet this requirement through commitments.
The plan period runs from 2015 to 2035 however the plan period for land supply runs from 2018 and, in the case of housing only runs until 2033 (Table 5). This is an unnecessary complication and must revised to ensure the plan period and supply period run from the same dates. This complication is highlighted by para 4.77 of the Plan which mistakenly quotes a 15 year period of the plan running from 2018-2035). The Housing Trajectory set out in Figure 3 confirms that the requirement of 920dpa will not be reached in the final 9 years of the plan period and 550dpa (Standard Method Requirement) will not be achieved for 7 years of the plan period. Additionally, the trajectory of housing supply over the plan period presented in Figure 3 of the DLP suggests that the overall allocations mean that the DLP is actively planning to fail to meet its targets in the Plan’s later years. From 2026/27 onwards, the supply fails to meet the Local Plan Allocation Requirement (920dpa), and from 2028/29, the supply also fails to meet the Standard Methodology Local Housing Need Requirement (550dps as at 2019). Despite this averaging out to meet the overall 15 year supply targets, the uneven distribution means that the DLP is anticipating failure to meet targets in its latter years, which goes against the principles of the NPPF which outlines that plans should ‘provide a positive vision for the future’ and ‘be prepared positively, in a way that is aspirational but deliverable’ (paragraphs 15 and 16 of NPPF). There are a number of significant and fundamental issues with this approach as outlined below: - Fails to meet annual housing requirement - the OAN should be a minimum figure to be achieved on an annual basis - this is acknowledged within Appendix 12 of the draft Local Plan which confirms that net dwelling completions will be monitored each year against a target of 920dpa. The Council should therefore be making provision for delivery of a minimum of 920 each year throughout the plan period. The Council’s proposal to exceed 920dpa in the earlier years of the plan does not justify the significant decline in delivery proposed in later years. - Practical/Economic Implications - the differentiation between the levels of growth sought at the start of the plan period and those in the later years will have significant adverse economic impacts for Doncaster. The dramatic shift from over-provision to under-provision will lead to a significant drop in job availability within the construction industry and a significant decline in economic input from the house building industry in Doncaster in the later years of the plan. The housing delivery strategy must therefore be revised to ensure it sustains growth across the plan period and does not lead to a decline in Doncaster’s economy in the later years of the plan. Based on the position as outlined above, the strategy for delivery of housing in Doncaster is not positively prepared and fails to support growth. It is clear therefore that the delivery strategy must be revised and the Council must allocate additional sites for housing in addition to those currently proposed to ensure that a minimum annual delivery figure of 920 dwellings can be achieved every year. As drafted, Policy 6 is not sound as it is not positively prepared and is inconsistent with the NPPF for the reasons set out. The allocation of additional housing land, including our Client’s land at Finningley would provide an opportunity help to meet this shortfall in housing supply both in Finningley directly and in the wider Council-wide context.

Summary:
Policy 6 - Housing Allocation. Housing Strategy. 1. Para. 4.77 should read (2018-2033) not (2018-2035). 2. Fails to meet annual housing requirement. Should be a minimum figure to achieved annually (920). 3. Shift from over provision in early plan period to under provision later will have economic implications - job losses in construction industry. 4. Growth must be sustained across the plan period.

Response:
1 - agree, this has been amended; 2 - Both the use of a range and using the Standard Methodology figure is supported in Planning Practice Guidance / NPPF; 3 / 4 - the trajectory is further explained in the Housing Topic Paper, but over the plan period the plan will deliver more than the required housing supply.
Comment: Appendix 2 sets out site by site development requirements for the development of the allocated sites and identifies additional work or studies that may need to be undertaken and specific developer contributions which may be required. Appendix 2 identifies the proposed allocations on plan area by area. For ‘Site 350/407 The Avenue/Rose Hill Rise, Cantley, MUA’ reference is made to the design brief prepared for the site and identifies the following issues: archaeology; biodiversity; design; the requirement for Transport Assessment and Travel Plan; trees and hedgerows; public open space. This is a useful guide within the design process, but resolution of the issues identified will be a matter for the detailed design stage. Broadly speaking, Appendix 2 is helpful in identifying the issues to be resolved, the need for additional work or studies and potential requirements for development. It acknowledges that the issues identified are not an exclusive list and any departure from that will need to be justified. However, it should also acknowledge that the final requirements of the scheme and the ultimate form and quantum of development will be a matter for negotiation at the detailed design stage. This is in order to ensure the most effective use of land whilst safeguarding and improving the environment (in accordance with para 117 of the NPPF) and to provide clarity about design expectations but not to be prescriptive, allowing a suitable degree of variety (para 126 of the NPPF). Ultimately the potential of the site to accommodate and sustain an appropriate amount and mix of development should be optimised (para 127 e). Objection is therefore made to the introductory paragraph which should be amended to read: "Appendix 2 Development Requirements The Site Development Requirements set out various and specific requirements for the development of the allocated sites and identify potential additional work or studies that may need to be undertaken or where specific developer contributions may be required. The requirements cover issues such as archaeology, design, education contributions, etc., but they are not an exclusive list. The protection of identified on-site features or specific land use requirements, and the need to submit particular assessments or details, will be a matter for agreement between the developer and local planning authority during the detailed development management stage in order to ensure the most effective use of land. Site Development Requirements have not been identified where sites have been granted planning permission or development has commenced, or where a site does not require specific development guidelines." Reason: In order to make the Plan effective and compliant with national policy.

Summary:
Local Plan Appendix 2 - Developer Requirements o Resolution of the issues identified will be a matter for the details design stage. o Object to the introductory paragraph. It should be amended to conform to NPPF Representation includes a suggested rewording of Appendix 2 (see rep)

Response:
The introductory text is considered justified and helps to set out the issues that will need to be addressed through subsequent applications.
Comment: 2.1 This section of the representation statement provides comment on the Local Plan Publication Version Consultation Document. 2.24 Policy 6 states that housing allocations to deliver the housing requirement and distribution set out in Policy 3 are shown on the Policies Map and set out in Tables H1 (A-O) and Tables H2 (A-Q). There are no sites with planning permission or proposed as allocations in Clayton. 2.25 As set out in these representation statement, whilst changes have been made to Policies 2 and 3 since the previous consultation, the changes do not go far enough to support sustainable rural communities. It is considered that small scale development should be supported in villages that are located in close proximity to larger villages / settlements such that they have a functional relationship. 2.26 There are limited opportunities for infill development in Clayton and the Council’s current approach effectively prevents any further development in this village, removing choice for the younger generation who wish to remain in the village and support the local community. As previously highlighted, Clayton is not an isolated settlement but is located close to Thurnscoe which has a range of services and facilities, along with a train station. The NPPF clearly supports development in villages which would support other villages nearby. 2.27 ID Planning has reviewed the built extent of Clayton to identify opportunities for small scale developments to support this village and its community. The plan below identifies sites which it is considered provide appropriate and suitable development parcels for allocation. These sites are all in the control of Frickley and Warmsworth Estate who support the identification of these sites within the settlement limits. (SEE EMAIL FOR PLAN: Clayton - Sites Suitable for Development Limit Extension)

Summary: Whilst changes have been made to Policies 2 and 3 since the previous consultation, the changes do not go far enough to support sustainable rural communities. It is considered that small scale development should be supported in villages that are located in close proximity to larger villages / settlements such that they have a functional relationship. There are limited opportunities for infill development in Clayton and the Council’s current approach effectively prevents any further development in this village, removing choice for the younger generation who wish to remain in the village and support the local community. A review has been submitted of small scale developments to support the village and its community.

Response: It is deemed that when villages are close to larger settlements (as they often are), it is a more sustainable approach to deliver housing in the larger settlements. Policy 2 allows for infilling in Green Belt villages, and also development in the countryside (subject to caveats) in villages to the east, in line with NPPF para. 78. However, the Settlement Audit has shown that many villages have limited to no service provision. The Housing Topic Paper explains this further.
Comment Ref: C/Policy 6/05319/1/011

Attend Examination: Attend Hearing

Reason: The matters raised in our representation go to the heart of the Local Plan. It is considered that attendance at the relevant hearing sessions will allow further comment to be made where appropriate.

Area: Chapter 4: Strategic Approach

Policy: Policy 6: Housing Allocations

Tests of Soundness: 

Comment:

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.

Summary:

- Levels of growth at each settlement should be supported by analysis of deliverability and viability.
- Carcroft Skellow should have a higher housing requirement figure.
- Suggest plan period extended by 2 years and buffer include for none delivery of some sites.
- The minimum requirement for C&S should be 425 to 450 dwellings over the plan period (identified through allocations).
- Accept approach that some Greenbelt sites are required - suggest 'Ings Lane' site should be allocated.

Response:

Consideration has been given to the viability and delivery of sites, the Settlement Strategy informed where housing should be directed and then sites were sought to deliver this through a Call for Sites which were assessed through the HELAA. This is explained in the Site Selection Methodology. Carcroft has a share of the baseline, which was assessed as appropriate for a settlement of its size and service provision, as explained in the Housing Topic Paper. It is also constrained in large parts by areas of flood risk, including part of the site promoted at Ings Lane. The Local Plan does have a buffer due to the housing figures not accounting for a number of matters, including windfalls, delivery beyond the plan period and potential housing at the airport. This matter is discussed more in the Housing Topic Paper.
A reserve development site is identified at Table H3(E) off Owston Road, Carcroft comprising 3.3 hectares 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 (Page 114) as PH1 (3/15) Land at Owston Road, Carcroft extending to 3.4 hectares 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.

Summary:
- Suggest reserve site 'Owston Road' Carcroft is not suitable or deliverable as it is a flood risk and has not had any developer interest in last 20 years.
- Therefore, settlement strategy fails to meet the needs of Carcroft Skellow.

Response:
The Reserve Development Sites are not relied on to deliver housing to areas or to deliver the spatial strategy. They are additional areas where development would be supported subject to constraints being overcome. The housing requirement in Carcroft - Skellow is being met via the allocation of site 165/186.
The comprehensive Masterplan must also be informed by a proper understanding to the potential impact which any redevelopment of this area might have upon the historic environment. Although there are no designated heritage assets within the area defined on the Proposals map, given the proximity of this site to the Roman Road from Lincoln to Doncaster, there is a high likelihood of important archaeological remains in this area some of which may, potentially, be of national importance. The National Planning Policy Framework makes it clear that nondesignated archaeological sites that are demonstrably of equivalent significance to a Scheduled Monument should be considered as being subject to the same Policies as for a designated heritage asset (i.e. that ‘great weight’ should be given to their conservation and that substantial harm or loss to such remains should be wholly exceptional). In further developing the Masterplan it will be important to understand what archaeology may be present on this site and how these might need to be addressed in any development proposals. There are also numerous buildings and structures associated with the former RAF Finningley from its time as part of No. 3 Bomber command in the 1930s and 40s and as a base for Vulcan Bombers during the 1950s. An evaluation of the impact of the future proposals will need to understand the importance of these structures to our understanding of the development of the airfield and aviation history. Immediately to the east of the airport is Finningley Village Conservation Area which contains the Church of the Holy Trinity and St Oswald which is a Grade I Listed Building. In line with national policy guidance, any development proposals will need to demonstrate what impact they are likely to have upon the setting of these assets and, if they are likely to result in harm, how it is envisaged that that harm will be removed or reduced. PROPOSED CHANGE Add an additional Section as part of the Explanation setting out the considerations in terms of the historic environment.
The justification to this Policy should explain what is envisaged as being a development which supports the 'aviation history' of Finningley. There numerous buildings and structures still remaining on this site associated with the former RAF Finningley from its time as part of No. 3 Bomber command in the 1930s and 40s and as a base for Vulcan Bombers during the 1950s. It is hoped that it would involve some recognition of this legacy and, if possible, that any strategy should seek to retain some of its historic aviation buildings. PROPOSED CHANGE Amend accordingly.

The explanatory text should set out what is envisaged by development that supports the aviation history of Finningley as well as there being a strategy to retain some of the historic aviation buildings.

Response:
It is not proposed to incorporate Historic England's request as such proposals in the operational area of the Airport would likely fall under permitted development rights. It is also noted that a planning application has recently been granted for the new facility/visitor attraction housing the Vulcan Bomber. Policies in the Local Plan address matters such as Listed Buildings (Policy 37) and Conservation Areas (Policy 38) and the whole plan should be read together.
The proposals for growth at the airport are unsustainable, unsound and unjustified. 1. Local planning authorities have a duty under Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) to ensure that plans 'contribute to the mitigation of, and adaptation to, climate change'. There is no evidence of this approach towards Policy 7. This duty means that local plans should be based on evidence relating to the Climate Change Act targets (including identifying baseline carbon emissions data), and monitoring of plans in annual monitoring reports should demonstrate how development is contributing to meeting those targets. Doncaster Sheffield Airport's (DSA) plan for transformational growth can only be supported in the context of a carbon pathway to net zero greenhouse gas emissions by 2050, with binding carbon targets. This pathway should include domestic and international aviation emissions and a commitment to amend the programme of interventions to meet those targets. 2. During development of this version of the Local Plan, climate change has developed into an existential threat and emergency. The October 2018 Special Report from the Intergovernmental Panel on Climate Change (IPCC) concluded that in order for warming to stay below 1.5°C, human-caused CO2 emissions must fall to net zero by 2050 or earlier (note 1 - October 2018, http://www.ipcc.ch/report/sr15/) which will require ‘rapid and far reaching transitions’ that are ‘unprecedented in scale’ and imply deep emissions reductions in all sectors. The Committee on Climate Change (CCC) published its response to the IPPC’s report (note 2 - Net Zero The UK’s contribution to stopping global warming, Committee on Climate Change, May 2019), and in June 2019 the Government accepted the Committee’s advice and amended the 2050 target under the Climate Change Act to require net-zero greenhouse gas emissions by that date. 3. DfT has yet to report on its 2018 consultation on the Future of UK airports 2050, a document that relied on aviation emissions increasing from 37.3MtCo2e in 2016 to 39.9Mt in 2050, or a 7% increase. However, in its 2019 progress report (note 3 - Reducing UK Emissions: 2019 Progress Report to Parliament, Committee on Climate Change July 2019) the CCC recommends the formal inclusion of aviation emissions in the Climate Change Act targets and a long term strategy for aviation that reflects net zero by 2050. In accepting the CCC advice on the IPCC report the Government stated that emissions should reach net-zero across the whole economy (i.e. including international aviation and shipping) and that the aim would be to reach net-zero emissions without recourse to international credits (or ‘offsets’), consistent with the Committee’s advice (note 4 - House of Commons Hansard (12 June 2019) Net Zero Emissions Target, Volume 661, Columns 673 and 682.). Consequently, although the Government does not have in place a framework for aviation carbon reduction, it is clearly its intent to develop one. 4. The current planning consent for the airport limits aircraft movements to 57,000 per annum with the airport having seen an average of 16,000 movements per annum over the last 3 years. It currently moves about 1million passengers per annum (mppa) and 7,000t of freight per annum (note 5 - https://www.caa.co.uk/Data-and-analysis/UK-aviation-market/Airports/Datasets/UK-Airport-data/Airport-data-2018/ ), although fully realised it could handle 25mppa and 250,000t of cargo (note 6 - Sheffield City Region Integrated Rail Plan, July 2019). The Interim Masterplan aims for increases of between 4mppa (core growth strategy) and 7mppa (high growth strategy) by 2037, and for between 70,000t and 170,000t of freight for the same respective scenarios. Both these appear unrealistic based on historical data for DSA (Doncaster Sheffield Airport). Since the airport opened in 2005 passenger numbers have largely remained below 1mppa and only rose above that figure in the last 3 years. Freight movements have fluctuated well below 1,000t per annum and in the last 3 years have fallen by nearly 25%. The emissions for freight transfer are always higher by air compared to road, let alone by rail or sea (note 8 - The various emission factors for freight transfer KgCO2 per tonne km are that air freight is by far the highest; HGV freight on average emits less than a quarter of the least emitting air freight - so it would always be more carbon efficient to transship freight S+N or N+S by road rather than air - but the most carbon efficient freight transport is by rail and ship - see DEFRA 2008 Guidelines to Defra’s GHG Conversion Factors: Reducing UK Emissions: 2019 Progress Report to Parliament, Committee on Climate Change July 2019). 5. Transport is the one sector that has failed to meet its carbon budgets, with the sector’s emissions at the same level in 2016 as they were in 1990 (note 9 - 2016 UK Greenhouse Gas Emissions Final figures, BEIS, 2018, Table 6). Surface transport is the largest-emitting sector in the UK, accounting for 23% of UK emissions (note 10 - Net Zero Technical Report Committee on Climate Change, May 2019, Figure 5.1) with cars accounting for the majority of them. Even with a shift to electric vehicles, the level of reduced car mileage needed to meet the UK carbon budget by 2030 is estimated to be between 20% and 60%, depending on the speed of the switch to electric vehicles and how fast the electricity powering them is decarbonised (note 11 - More than electric cars, FoE, May 2019). It is therefore imperative that traffic reduction is implemented urgently. The scale of the effort required has been shown by work done by the Tyndall Centre for both the West Yorkshire Combined Authority and Sheffield City Council (note 12 - https://www.sheffield.gov.uk/content/dam/sheffield/docs/your-city-council/climate-change/Sheffield_Report_V1.3.1.pdf). 6. In that context both the Airport Surface Access Strategy and access to the housing and employment market must be based on demand management of road capacity and development of sustainable alternative modes. NPPF para 103 requires significant development to be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. A robust approach should be taken towards travel to and from the site using the Institution of Mechanical Engineers’ Transport Hierarchy 2013 (note 13 - https://www.imeche.org/policy-and-press/reports/detail/transport-hierarchy), the Transport for New Homes Checklist 2019, and NPPF para 110. The proposal for improved access to the M18 would encourage journeys by car to both the airport and any new development. Demand management of traffic with investment in alternatives modes of travel and travel planning must be implemented. 7. The proposal for a southern link from the DSA station, creating a loop to allow ECML expresses to serve the airport cannot be justified based on the past history of the airport.
which suggests that neither the passenger nor the freight base exists to support it. A less ambitious intervention to create a station on the Lincoln line at DSA should be substituted. 8. The approach towards development at the airport refers to the requirement for a comprehensive Masterplan, which would include an up-to-date airport surface access strategy. At this current time the only document available to us is the 2018 Interim Consultation Report on the Masterplan 2018-2037 which was published by the airport owners and not subject to wider stakeholder involvement in its development. It is essential that the process for developing the masterplan is implemented. 9. Given the uncertainty surrounding the approach to climate change for both surface access and aviation, and DSA's history there should be serious concerns about the implementation and delivery of Policy 7. PROPOSED CHANGE Amend opening sentence of Policy 7: Growth and investment at Doncaster Sheffield Airport (in areas defined in the Policies Map), will only be supported in the context of a carbon reduction pathway to net zero by 2050, with binding targets, for the Borough and in line with the following principles: 7H) Access to the Airport must be shown to be compatible with an up to date Airport Surface Access Strategy (ASAS) to enable easy access through a range of travel modes, predominantly public transport, from the Borough, City Region and the wider region. Car parking for users of the airport will be limited in order to demand management travel by private car. There will be a presumption against provision of airport car parking in off-site locations outside the area of the airport growth plan. Amend J) 3. by adding Travel to and from the site will be based on the sustainable travel hierarchy which promotes walking, cycling, public transport and car sharing in preference to single occupancy car use for movement of people, and encourages efficient and sustainable freight. Travel plans for both business and residential development will be required. (See our new proposed policy Transport Hierarchy) The text to support this policy in paras 5.33-5.35 (including the second para 5.31) should be amended to remove the improved connection to the M18. Reference should be made to both the Transport Hierarchy and the Transport and the Transport for New Homes Checklist in 5.31 (under transport) and/or para 5.34.

Summary:
The proposals for airport growth are unsustainable, unjustified and unsound: Local Planning Authorities have a duty under Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) to ensure that plans 'contribute to the mitigation of, and adaptation to, climate change'. There is no evidence of this with Policy 7. The duty means Local Plans should be based on evidence relating to the Climate Change Act targets (including identifying baseline carbon emissions data), and annual monitoring reports should demonstrate how development is contributing to these targets. Airport proposals can only be supported in the context of the pathway to zero net emissions by 2050. This pathway should include domestic and international aviation emissions and a commitment to amend the programme of interventions to meet those targets. During the process of the Local Plan, climate change has developed into an existential threat and emergency. The government has set a target to reach zero net emissions by 2050. The DfT have (in their progress report on "Futures of UK airports 2050" - note 3 - Reducing UK Emissions: 2019 Progress Report to Parliament, Committee on Climate Change July 2019) accepted that aviation emissions should be included in the Climate Change Act Targets and net zero carbon by 2050. Although the government does not have in place a framework for aviation carbon reduction, it clearly aims to develop one. The DSA Masterplan is unrealistic when considered against historic passenger and cargo growth. Emissions for freight transfer by air are always higher than land or sea. The current planning consent for the airport limits aircraft movements to 57,000 per annum with the airport having seen an average of 16,000 movements per annum over the last 3 years. It currently moves about 1million passengers per annum (mppa) and 7,000t of freight per annum (note 5 - https://www.caa.co.uk/Data-and-analysis/UK-airaviation-market/Airports/Datasets/UK-Airport-data/Airport-data-2018/), although fully realised it could handle 25mppa and 250,000t of cargo (note 6 - Sheffield City Region Integrated Rail Plan, July 2019). The Interim Masterplan aims for increases of between 4mppa (core growth strategy) and 7mppa (high growth strategy) by 2037, and for between 70,000t and 170,000t of freight for the same respective scenarios. d in 2005 passenger numbers have largely remained below 1mppa and only rose above that figure in the last 3 years. Freight movements have fluctuated well below 1,000t per annum and in the last 3 years have fallen by nearly 25%. Transport is the sector that has failed to meet its carbon budgets. The Airport Surface Access Strategy and access to housing / employment sites must be based on demand management and development of sustainable alternative modes. Proposed M18 improvements would encourage journeys by car to both the airport and new developments. Demand management of traffic with investment in alternatives modes of travel and travel planning must be implemented. The ECM link is unjustified base on history of the airport which suggests neither the passenger or the freight demand exists. It should be substituted for the station on the Lincoln line. The airport approach needs a comprehensive Masterplan with an up to date surface access strategy. The only document available is the 2018 airport masterplan prepared by the airport owners and not subject to wider stakeholder involvement in its development. There should be serious concerns about the implementation and delivery of Policy 7. PROPOSED CHANGE Amend opening sentence of Policy 7: Growth and investment at Doncaster Sheffield Airport (in areas defined in the Policies Map), will only be supported in the context of a carbon reduction pathway to net zero by 2050, with binding targets, for the Borough and in line with the following principles: 7H) Access to the Airport must be shown to be compatible with an up to date Airport Surface Access Strategy (ASAS) to enable easy access through a range of travel modes, predominantly public transport, from the Borough, City Region and the wider region. Car parking for users of the airport will be limited in order to demand management travel by private car. There will be a presumption against provision of airport car parking in off-site locations outside the area of the airport growth plan. Amend J) 3. by adding Travel to and from the site will be based on the sustainable travel hierarchy which promotes walking, cycling, public transport and car sharing in preference to single occupancy car use for movement of people, and encourages efficient and sustainable freight. Travel plans for both business and residential development will be required. (See our new proposed policy Transport Hierarchy) The text to support this policy in paras 5.33-5.35 (including the second para 5.31) should be amended to remove the improved connection to the M18. Reference should be made to both the Transport Hierarchy and the Transport for New Homes Checklist in 5.31 (under transport) and/or para 5.34.

Response:
Climate change is a theme that runs through the whole plan and the plan is intended to be read as a whole. Policies in the chapter fully promote sustainable forms of travel such as walking and cycling. A Climate Change Topic Paper has been prepared for Submission stage. The DSA masterplan is not replicated verbetim in the Local Plan, and Policy 7 seeks to support elements of it, but also provides checks on some elements such as housing growth, which is linked to job delivery. All proposals around the airport are effectivley linked to its success, which the Council supports. The ECML will not come forward unless there is a robust business case for doing so, however should it come forward, this would represent a genuine step change for the airport and the Borough. The Council acknowledges that the airport masterplan does not cover a range of matters and has been prepared by the airport operator. This is why Policy 7 requires the formulation of a 'blueprint', which will show how the airport proposals can be delivered holistically and cover a range of areas that need to be covered. This will be produced between the Council, airport operator, stakeholders and local community.
**Comment Ref:** C/Site 940/0077/6/029  
**Name:** Campaign To Protect Rural England South Yorkshire  
**Organisation:** Campaign to Protect Rural England South Yorkshire

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<td>Reason:</td>
<td>To assist the Inspector by using our submitted representations to answer his/her questions, particularly in light of the evidence submitted by other representors and any other matters the Inspector may raise.</td>
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**Comment:**  
Proposed Housing Allocations Site Ref: 940 Location: Airport Objection: Would only be justifiable on basis of robust sustainability strategy with regard to new railway access and carbon reduction strategy. **PROPOSED CHANGE** Delete the proposed allocations for the reasons shown in our table above.

**Summary:**  
Site 940 would only be justifiable on the basis of a robust sustainability strategy with regards to new railway access and carbon reduction strategy. **Proposed change:** delete the proposed allocation

**Response:**  
Site 940 will remain as an allocation, and is deemed a suitable site for the reasons set out in Policy 7, and within the parameters set out in this policy. Reject deletion of the policy.
We have an outstanding objection to the application for Doncaster Sheffield Airport due to the number of concerns with regards to loss of designated sites and biodiversity, inadequate survey information and masterplan information. We also outlined our objections in the previous local plan consultation. Whilst we would refer you to our objections previously submitted, we would like to reiterate that the airport proposals are contrary to NPPF guidance and Policies 30 and 31 of this local plan draft. Policy 7 K does not consider the impacts to Local Wildlife Sites (LWS) and the difficulty to achieve green infrastructure across the site. The masterplan currently put forward is consequently highly insufficient. Furthermore within explanation paragraph 5.26, we feel that there is no evidence of the first stage of the mitigation hierarchy being followed with regards to this application (avoidance). Whilst we appreciate that avoidance of impacts is difficult due to the topography of the site, no alternatives appear to have been considered to prove the requirement of overriding public interest to allow for impacts with little to no mitigation. We believe that, in accordance with Policy 30 of this Local Plan, all LWS on and adjacent to site should be retained with a suitable buffer provided to protect their functionality. The current buffers around the sites such as Finningley Big Wood are not considered sufficient to protect its function due to the heavy landscaping and fragmentation from nearby sites. Further consideration for the protection of ecological corridors therefore also needs to be further considered and is not evidenced within any of the current documents. Furthermore, Policy 31 of this Local Plan states DEFRA’s biodiversity metric must be utilised to show a minimum of 10% net gain on the site. In accordance with our response to DEFRA on consultation of this metric, a multiplier must be utilised to reflect the value of the designated sites to be lost.

Objections raised at the previous consultation still stand. Airport proposals are contrary to NPPF guidance and Policies 30 and 31 of the draft Local Plan. Policy K needs to consider Local Wildlife Sites and the difficulty in achieving green infrastructure across the site. The masterplan is highly insufficient. Furthermore, as per para. 5.26, there is no evidence that the first stage of the mitigation hierarchy being followed with the new application (avoidance).

The masterplan is an airport document, which will be supplemented by a detailed blueprint developed by the Council, airport operator and local community. As set out in the subtext to Policy 7, the blueprint must cover, amongst other things, the environment. The subtext clarifies that the blueprint must include a green infrastructure strategy, as well as cover biodiversity protection, and how biodiversity net gain will be achieved. The plan should be read as a whole, and Policy 7 sits alongside 30 and 31, and are not contrary to these.
### Summary:

Policy 7. continued. The draft Local Plan divorces DSA from its role in the wider spatial strategy. This is significant because it overlooks the existing demand for jobs (and by association the requirement for homes and labour supply) associated with role of DSA as a growth driver. This also raises issues of consistency with national policy, given the ability of DSA to support a prosperous rural economy. Specifically, the spatial strategy fails to recognise that a number of settlements in close proximity to DSA, including Finningley and Auckley-Hayfield, have significant potential to support sustainable patterns of development associated with the delivery of housing and economic growth consistent with paragraphs 78 and 83 of the National Planning Policy Framework 2019 and achievement of the airport's objectives. It is therefore not justified that the proposed spatial strategy, and the approach to the scale and distribution of housing outlined in proposed Policy 3, does not support any contribution to the economic-led component of housing growth at Service Towns and Larger Villages in close proximity to DSA. This only applies to 'Main Towns' identified as potentially suitable to deliver up to 10% of the economic-led growth requirement. We advocate that suitable sites, sustainably located in relation to settlements at Finningley and Auckley-Hayfield, and which complement the strategy for DSA, should be identified to meet the need for jobs-led growth in the overall housing requirement. It is appropriate that such sites contribute towards the Borough's identified housing needs without delivery being directly linked to jobs growth at DSA. It should also be noted that the DSA Masterplan 2018-2037 'Interim Consultation Summary Report' (August 2018) (p.41) identifies that, in terms of demand for residential development to support the airport's objectives, surrounding settlements already demonstrate high volumes of property transactions. This is a strong indicator of local demand and reflects that pressure for housing in the local area already reflects the area's significant contribution to the wider sub-region. This is best addressed through the plan-led approach.

### Response:

DSA has been factored in to the Peter Bretts work. It has always been acknowledged that the case for DSA is separate to the wider spatial strategy. The settlements of Auckley - Hayfield Green and Finningley also have housing requirements and are set out in the spatial strategy and a housing target attributed to them. It should be noted that if the airport delivers the growth envisaged, then Auckley - Hayfield Green will deliver a level of housing on a par with Main Town targets. It is therefore felt that the area is delivering a sufficient amount of housing for its size, and there is no need to allocate additional land in settlements adjacent to the airport. The outcome of consultation was that economic led growth should be delivered in the Main Urban Area and Main Towns, and smaller areas should receive housing to meet local needs only.

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2.49 In relation the potential for job growth at DSA, the draft Local Plan looks to divorce DSA from its role in the wider spatial strategy. This is significant because it overlooks the existing demand for jobs (and by association the requirement for homes and labour supply) associated with role of DSA as a growth driver. This also raises issues of consistency with national policy, given the ability of DSA to support a prosperous rural economy. Specifically, the spatial strategy fails to recognise that a number of settlements in close proximity to DSA, including Finningley and Auckley-Hayfield, have significant potential to support sustainable patterns of development associated with the delivery of housing and economic growth consistent with paragraphs 78 and 83 of the National Planning Policy Framework 2019 and achievement of the airport's objectives. It is therefore not justified that the proposed spatial strategy, and the approach to the scale and distribution of housing outlined in proposed Policy 3, does not support any contribution to the economic-led component of housing growth at Service Towns and Larger Villages in close proximity to DSA. This only applies to 'Main Towns' identified as potentially suitable to deliver up to 10% of the economic-led growth requirement. We advocate that suitable sites, sustainably located in relation to settlements at Finningley and Auckley-Hayfield, and which complement the strategy for DSA, should be identified to meet the need for jobs-led growth in the overall housing requirement. It is appropriate that such sites contribute towards the Borough's identified housing needs without delivery being directly linked to jobs growth at DSA. It should also be noted that the DSA Masterplan 2018-2037 'Interim Consultation Summary Report' (August 2018) (p.41) identifies that, in terms of demand for residential development to support the airport's objectives, surrounding settlements already demonstrate high volumes of property transactions. This is a strong indicator of local demand and reflects that pressure for housing in the local area already reflects the area's significant contribution to the wider sub-region. This is best addressed through the plan-led approach.

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2.51 It should also be noted that the DSA Masterplan 2018-2037 'Interim Consultation Summary Report' (August 2018) (p.41) identifies that, in terms of demand for residential development to support the airport's objectives, surrounding settlements already demonstrate high volumes of property transactions. This is a strong indicator of local demand and reflects that pressure for housing in the local area already reflects the area's significant contribution to the wider sub-region. This is best addressed through the plan-led approach.
2.52 The overall vision for DSA demonstrates the importance of the airport in boosting productivity, job creation and as a catalyst for the sub-region. The Draft Doncaster Sheffield Airport Masterplan (2018-2037) is underpinned by the potential for the creation of up to 73,000 jobs, which reflects aspirations beyond the plan period. It is broadly appropriate that proposed Policy 7 is not underpinned by these requirements, but they form an important context for DSA’s relationship to strategic priorities in the sub-region and the overall justification for the employment-led component of the Local Plan’s requirement for housing growth to support labour supply. This is in-turn important evidence to inform the distribution of growth to this part of the plan area. The significant gap between the assumptions for job growth in the DSA Masterplan and the potential for development identified in Policy 7 indicate that this element of the spatial strategy is not positively prepared. 2.53 Our soundness concerns with the proposed approach to Policy 7 are that the relationship to potential jobs growth (and existing levels of employment at DSA) is based on an extremely narrow interpretation of the Draft Masterplan’s explanation of the airport’s contribution towards economic development. Page 6 of the Draft Masterplan states that DSA currently supports around 1,000 jobs, which is the figure relied upon in Policy 7 as the baseline above which future housing growth in association with delivery of the Masterplan will be supported. 2.54 The approach to identifying the ‘baseline’ in Policy 7 also wholly fails to acknowledge significant existing planning commitments that complement opportunities for jobs growth outside of the DSA Masterplan (and Local Plan allocation) boundary. The Council’s Housing and Employment Land Availability Assessment confirms 3.6ha of deliverable supply on the site of the Former Blaxton Quarry (see Policy 4). Planning permission for the site (under 09/01292/OUTM) provides indicative totals for floorspace of 215,003 sqft (19,975sqm) B2/B8/Sui Generis and 7459sqft (693sqm) B1 Offices. This would provide for an estimate of at least 375 jobs in accordance with jobs-to-floorspace densities used in the Council’s HELAA. 2.55 This interpretation of the baseline in terms of its relationship with future potential and the economic-led component of housing growth to support necessary growth in the labour force is not justified. Draft Policy 7 relies on reference to the 1,000 existing jobs figure, plus the Council’s pro-rata assumption for provision of 2,545 jobs over the whole plan period to 2035, in order to account for initial support for up to 280 homes within the DSA Masterplan (at Hurst Lane - Site E2). 2.56 This is divorced from the ‘Core growth scenario economic benefit summary’ outlined in the Draft Masterplan, which anticipates growth to 4,495 Full-Time Equivalent jobs by 2026 (DSA Draft Masterplan, 2018, p.90). 2.57 The Council provides no clear justification for how it interprets the role of the airport in the local and sub-regional economy and as a result Policy 7 does not provide a basis to assess the overall contribution to economic development. The core scenario of the DSA Masterplan provides a wider view, and recognises that a substantial proportion of this activity will be generated locally and induced by increased passenger numbers and associated visitor spending associated with use of the airport. The Draft Masterplan notes: "Based on average inbound visitor spending and assumptions regarding the proportion of spending that could be retained within Sheffield City Region, it is estimated that the spending of inbound visitors could support a further 638 gross FTE jobs annually by 2037" (DSA Draft Masterplan 2018, p.89). 2.58 This is in addition to the substantial potential for growth in permanent, FTE, jobs associated with the construction phase. While this calculation is based on development of DSA airport itself this sector of the economy will support delivery of the Local Plan’s overall requirement for growth; equally some growth in the construction workforce may take place before aspects of the DSA Masterplan are implemented. Neither of these components of economic development appear to be recognised in the Council’s Appendix 3 which is associated with monitoring jobs growth at DSA. 2.59 National planning policy requires that Local Plans are reviewed at least every five years. The objective for a substantial opportunity for residential growth south of the Airport Approach Road should, as outlined in the Council’s Pre-Submission Local Plan (paragraph 5.30), form part of measures to ensure comprehensive delivery and masterplanning. The measures to control any potential additional growth in the plan period through Policy 7 and the accompanying Appendix 3 are not justified and would not be effective. This would generate significant uncertainty surrounding future monitoring requirements (in terms of measuring job growth) and barriers to implementing the policy as intended. 2.60 It is notable that the Council’s own 2018 Housing and Economic Land Availability Assessment (HELAA) indicates that for Site Ref 940 (‘Poplars Farm, Hurst Lane’) only 140 should be regarded as deliverable in years 0-5 of the plan period. This is significantly less than the 280 units indicated as a first phase of growth (Site E1) nearest the approach road and indicative location for the Commercial Plaza. This strongly indicates that the future requirements for comprehensive development can most effectively be addressed as part of Local Plan review, whereas both Site E2 (as identified in the Local Plan) and the proposed additional capacity at the Higgin’s Site provide essential opportunities to address the housing requirement upon adoption. Recommendation 2.61 Policy 7 should be revised to focus supporting development associated with the airport growth within the surrounding settlements to meet the objectives of Policies 3 and 6 (based on recommended amendments as made herein). Justification 2.62 The Higgin’s Site is located directly adjacent to the airport site boundary and the provision of housing in this location would support the regeneration of a previously developed site and the vitality and sustainability of the existing settlement. The site is therefore a highly sustainable location for which to accommodate new housing development to support growth in the area. The allocation of the site for housing will also support the regeneration of the site and the viability and sustainability of the village of Finningley. 2.63 As outlined above when discussing Policy 6, the Higgin’s Site is a more sustainable and desirable option than site ref: 940 for the housing required to support the substantial growth of Doncaster Sheffield Robin Hood Airport. 2.64 The additional housing will support the uplifted housing figure proposed within this representation in relation to Policy 3. If the Council is not minded to accept this figure, the inclusion of the site for development under Policy 7 (i.e. in addition to the standard Local Plan figures) is also considered to be justified on the basis of supporting sustainable economic growth associated with the Draft
Summary:

DSA Masterplan and the potential to create 73,000 jobs during the plan period is important evidence to inform the distribution of growth to this part of the plan area. Soundness issues in relation to jobs and the narrow interpretation of the draft Masterplan’s explanation of the airport’s contribution towards economic development. 1,000 jobs, which is the figure relied upon in Policy 7 as the baseline above which future housing growth in association with delivery of the Masterplan will be supported. The ‘baseline’ in Policy 7 fails to acknowledge significant existing planning commitments that complement opportunities for jobs growth outside of the DSA Masterplan (planning permissions identified see full response) interpretation of the baseline in terms of its relationship with future potential and the economic-led component of housing growth to support necessary growth in the labour force is not justified. Draft Policy 7 relies on reference to the 1,000 existing jobs figure, plus the Council’s pro-rata assumption for provision of 2,545 jobs over the whole plan period to 2035. This is divorced from the ‘Core growth scenario economic benefit summary’ outlined in the Draft Masterplan. The Council provides no clear justification for how it interprets the role of the airport in the local and sub-regional economy and as a result Policy 7 does not provide a basis to assess the overall contribution to economic development. Measures to control any potential additional growth in the plan period through Policy 7 and the accompanying Appendix 3 are not justified and would not be effective. Council’s own 2018 Housing and Economic Land Availability Assessment (HELAA) indicates that for Site Ref 940 ('Poplars Farm, Hurst Lane') only 140 should be regarded as deliverable in years 0-5 of the plan period. This is significantly less than the 280 units indicated as a first phase of growth (Site E1) Policy 7 should be revised to focus supporting development associated with the airport growth within the surrounding settlements to meet the objectives of Policies 3 and 6 Higgin’s Site 189 is located directly adjacent to the airport site boundary, supports regeneration, vitality and sustainability of existing settlement and additional housing will support the uplifted housing figure.

Response:

Unclear where 73,000 jobs has been derived from. 1,000 jobs as a baseline is an assumption pending clarification on the actual amounts of jobs which exist at the airport. The policy focuses on the importance of jobs being delivered at the airport and airport related jobs in the Borough. It is considered proportionate to only factor in jobs around the airport when setting a baseline as these are the most readily definable elements to consider. Policy 7 is not reliant on “1,000”, it is used as a general example of what the level of jobs may be for illustrative purposes. The HELAA build out rates are not limits, but assumptions about what might be deliverable per annum. The site does not form part of the trajectory and therefore no assumptions have been made about when it might come forward or what the build out rate might be. The policy also is related to permitting housing, not housing being completed and built, subject to jobs delivery. There is no need to identify additional land around the airport, given the allocation of 940, and furthermore the fact that Auckley - Hayfield Green has allocations that far supass it’s housing target. Finningley is only 5 units short of it’s target of 55 units. Given this is the smallest settlement to receive an allocated supply, further allocations on the scale proposed would not be in line with the settlement strategy or hierarchy.
2.41 Policy 7 of the Publication Local Plan supports the growth of and investment in Doncaster Sheffield Airport, which will be supported by its future expansion. These representations endorse the support for Doncaster Sheffield Airport (DSA). This strategically important location is central to the strategic priorities of the plan area and delivery of the Local Plan’s objectives. However, it is necessary to highlight a number of issues of soundness regarding the relationship between DSA and the Council’s approach to the wider spatial strategy. These concerns should be read in the context of the SPRU commentary regarding the appropriateness of the housing requirement identified in the Pre-Submission Local Plan and the resulting outcomes for scale and distribution of development (see Appendix 1). (SEE EMAIL FOR Appendix) 2.42 This Appendix highlights the need to ensure that the number of new homes proposed in Policy 3 adequately reflects the requirement to support economic growth and availability of labour to meet the future potential for growth in the number of jobs in the Borough. The draft Local Plan should therefore support the delivery of 1,073 dwellings per annum for the full plan period 2015-2035, ensuring provision for a full 15 years following adoption. 2.43 The Council must consider a more flexible approach to the scale and distribution of growth to recognise the range of potentially suitable locations to meet development need identified under the government’s standard method plus the component of the requirement necessary to support economic growth (and ensure the delivery of affordable housing). 2.44 Policy 7 is therefore supported in principle but requires modifications to other policies as proposed herein, to ensure that it is effective.

Summary:
Policy 7 is supported in principle but requires modifications to other policies to ensure that it is effective. Site is strategically important location is central to the strategic priorities of the plan but there are a number of soundness issues regarding the relationship between DSA and the Council’s approach to the wider spatial strategy. These concerns are noted in appendix SPRU commentary regarding the appropriateness of the housing requirement identified in the Pre-Submission Local Plan. Local Plan should support the delivery of 1,073 dwellings per annum for the full plan period 2015-2035 Council must consider a more flexible approach to the scale and distribution of growth to recognise the range of potentially suitable locations

Response:
The Peter Brett report sets out that 1073 dpa relates to the requirement under the previous NPPF, and that the requirement is 912 (920 dpa) - although the report also notes a figure between 585 and 912 could be appropriate. The Council has chosen to plan for 920 dpa. In meeting this, the airport is additional and treated as a separate matter, and so housing growth here would be additional. The Local Plan will deliver in excess of this.
A safeguarded route through the ACY site for a rail connection linking the East Coast Mainline with the

Chapter 5: Doncaster Sheffield Airport & Business Park

A cargo

In order to explain further the rationale behind the suggested changes and be given the opportunity to respond to any changes the Council propose to make and any further evidence that is presented.

Area: Chapter 5: Doncaster Sheffield Airport & Business Park

Policy: Policy 7: Doncaster Sheffield Airport & Business Park

History of the Airport

3.1 The Airport site has been in use for aviation purposes since 1915 when it was founded as Finningley Airfield. It was utilised throughout both the First and Second World Wars as an airbase and training facility; and post-war as a base for numerous RAF Corps and training units. 3.2 RAF Finningley was decommissioned in 1996. It was then converted and re-opened in 2005 as Robin Hood Airport Doncaster Sheffield when it began to operate commercially. 3.3 The Airport is now named simply 'Doncaster Sheffield Airport' (DSA); it has become a major economic asset to Doncaster, the Sheffield City Region (SCR) and beyond. It is recognised by TfN as one of a network of Regional Airports which are crucial in providing the North of England with International Connectivity, which in turn is of fundamental importance to Northern Powerhouse objectives. 3.4 Located in South Yorkshire, Doncaster is an important transport hub in the UK, lying close to the boundary between Yorkshire and North Nottinghamshire and at the heart of the UK’s major motorway network. DSA is directly connected to the M18 by the Great Yorkshire Way (GYW) link road providing onward connections to the A1(M), M1, M62 and wider national motorway network. In addition to the existing housing, commercial, retail and community facilities in and around the airport, DSA has the requisite ingredients to create a highly sustainable and vibrant place centred around what is now and will continue to be, Doncaster’s and the Sheffield City Region’s largest single economic asset. The Airport Today 3.5 DSA is one of the fastest growing airports in the UK and is a major employer currently supporting over 1,000 jobs. It has witnessed a 103% growth in passenger numbers in the years 2013 - 2019, with 2019 forecast to be the busiest on record with c.1.4m passengers travelling to 50 destinations. In Summer 2019, DSA experienced a net gain of 12 destinations, more than any other UK airport. May 2019 saw the commencement of a new Transatlantic route to Sanford Florida, Yorkshire’s only long-haul service; in May 2020 this long-haul connectivity will be supplemented by an additional route to Cancun, Mexico. 3.6 The airport has also developed its air cargo capability and now has an outstanding reputation for offering flexible and efficient solutions to the cargo market. 2016/17 DSA saw 10,000 tonnes of cargo handled over the year, driven by an increase in regular ad-hoc cargo services. During 2017/18, DSA secured its first scheduled cargo flights bringing in perishables from Africa. 2018/19 was another record year with 16,500 tonnes of cargo handled. 3.7 This growth has been reflective of infrastructure investment that has been delivered in and around the airport. The recent completion of GYW phase 2 has delivered a transformative improvement in access between the airport and the wider city region, resulting in an increased catchment of 5.53 million people. 3.8 DSA is well placed to now continue its growth and capitalise upon its vast and unique potential. It has an enviable position with unconstrained aviation capacity (for both passenger and cargo), has a catchment area larger than many other UK airports and has extensive landholdings to facilitate airport growth accompanied by supporting infrastructure, complementary land uses and a truly sustainable community. It has one of the UK’s longest runways and could facilitate, if embraced and supported, an airport equivalent to London Stansted or even London Gatwick in their current single runway forms. 3.9 In short, DSA is primed for growth at a level which is simply unrivalled by other airports. 2018 Draft Airport Masterplan 3.10 To harness and guide this growth, Peel has produced a new draft DSA Masterplan (DSAM). The DSAM comes at a time when the airport is experiencing significant growth resulting from new passenger services, increased cargo and general aviation activity. DSAM and the wider Aero Centre Yorkshire (ACY) site within which it sits already brings a gross added value of #62 million per annum to the regional economy and supports almost 1,000 jobs. This in itself is a significant economic contribution. However through delivery of the DSAM this contribution is anticipated to grow exponentially. 3.11 The DSAM represents a significant investment (between #0.9 and #1.66BN construction value) which will provide crucial infrastructure and drive significant job creation in Doncaster and the Sheffield City Region as the airport grows and the ACY estate develops out. The vision is to deliver transformation of the regional airport into a major intercontinental gateway, alongside a significant mixed-use growth area. 3.12 This new DSAM takes account of significant further land assembly which has taken place since the previous DSA Masterplan. It sets out a vision to create an aerotropolis and sustainable community, on an enlarged scale which seeks to capitalise on the unique potential of DSA and fully reflects the high levels of ambition of the City Region Economic Plan. 3.13 The masterplan proposes: - A passenger operation of 4.6 million passengers by 2037 for potential for up to 7.2 million to be achieved in a high growth scenario - A cargo operation handling 70,000 tonnes of air cargo by 2037, with potential for up to 176,500 tonnes of air cargo in a high growth scenario; - Major terminal enhancements including doubling the size of the terminal with expanded check-in, security, departure and immigration areas - New retail facilities to enhance the customer experience; - 1.5 million sq ft of airside development including expanded cargo operations, general business aviation facilities, multi-purpose hangarage and a dedicated Maintenance Repair Overhaul (MRO) campus, incorporating a satellite of the University of Sheffield Advanced Manufacturing Research Centre (AMRC); - Over 3 million sq ft landside logistics and advanced manufacturing space; - Up to 3,000 new homes; New retail outlets, hotels, leisure and community facilities to be provided within a central plaza which is to be the fulcrum of the community; and - A safeguarded route through the ACY site for a rail connection linking the East Coast Mainline with the Lincoln to Doncaster line, with a rail station close to both the passenger terminal and proposed central plaza area. 3.14 This level of intervention and growth is considerably greater than has been envisaged in the previous Masterplan and is forecast to result in 10,100 direct jobs, on-site within the DSA masterplan area including the airport itself across the LP plan period and will result in the transformation of the economic landscape of Doncaster, the City Region and provide a major contribution to the Northern Powerhouse. 3.15 Whilst the DSAM is not predicated on the new rail connection and station referenced above, in the event this direct connection to the East Coast Mainline (ECML) and new station are delivered, this would place 9 million people in the area east of the Pennines and north and east of London within 90 minutes travel time of
The DSAM terminal. This enhanced accessibility would further accelerate and increase economic growth and development around the airport to levels even greater than those envisaged under the Masterplan high growth scenario. Realising the DSAM ambition 1.1 DSA and ACY is Doncaster’s and the City Region’s single biggest economic asset. To unlock the potential, realise the DSAM and capture the economic benefits and growth that will arise, there is a need for longstanding commitment from Peel coupled with an overarching local planning policy framework to create the conditions to support the vision. 1.2 Peel has invested over £300m in developing DSA, delivering infrastructure and capital projects. It remains fundamentally committed to DSA and its transformation agenda. In simple terms; continual investment in capital projects, infrastructure and cash injections is necessary to sustain the operation and generate the anticipated growth in commerce, passenger and cargo which in turn will continue to foster further increases in economic growth and jobs both within ACY/DSA and across the Region. 1.3 Peel is planning to inject a further £50m into DSA itself over the next ten years to fund future capital projects / infrastructure and airline route development incentivisation, with an expectation of the airport becoming self-sustaining within the next five years or so. This includes investment in the following; some of which have been, or will be, the subject of planning applications: - Terminal improvements and extensions (planning application approved) - New departure gate bridges (planning application approved) - Expansion of the airport apron to provide additional aircraft stands - Additional car parks (partly delivered under Permitted Development rights with planning applications for the remainder as envisaged in the masterplan to be submitted in October 2019) - Airline financial investment (incentivisation and airline specific marketing activity). 3.16 This is in addition to substantial recent investments in: - Runway resurfacing (#6m) - Cargo transit shed expansion to ensure ability to maintain rapid growth in cargo throughput (#1.6m including #1.2m grant contribution) - Complete upgrade of Hold Baggage Screening x-ray equipment in order to remain compliant with European Civil Aviation Conference (ECAC) standards (#2.2m) - Car parking expansion - premium and meet and greet infrastructure (#0.9m); and - Airline incentivisation (#1.10m). 1.4 In terms of surrounding development proposals within the wider ACY site, Peel has recently secured renewal of permission for commercial development west of the passenger terminal and main passenger car parks and is in advanced discussions with various parties for transactions which will see continuation of recent commercial development activity in these areas. 1.5 To maintain momentum and provide the opportunity for further large scale commercial development within ACY, Peel has committed to the preparation and submission of planning applications, wider master-planning and capital delivery in respect of the following: Logistics and Advanced Manufacturing 3.17 To capitalise on DSA’s connectivity and the growth of the logistics sector, Peel submitted, in late 2018, an outline planning application (note 1 - LPA Reference: 18/02759/OUTA) for the development of 325,000m2 of high quality, state of the art advanced manufacturing and logistics floorspace. The outline planning application was accompanied by a full Environmental Statement (ES). 3.18 The significant financial commitment to the logistics and advanced manufacturing application was in part precisely to demonstrate to the Council and third parties that Peel is committed to seeing delivery of the employment elements of the DSAM as early as possible. 3.19 The application is currently awaiting determination. Central Plaza 3.20 Peel is also currently finalising a hybrid planning application to realise the vision of the central plaza to deliver up to 43,000sqm (GIA) of high quality mixed use development comprising commercial, retail and leisure floorspace, hotels and community uses as well as a small amount of residential apartments. The combination of uses seeks to deliver a range of facilities and services to create a unique place in the heart of DSA to support and bring together all elements of the DSAM, by meeting the needs of a growing living and working population, together with those of the airport community. 3.21 The draft hybrid planning application, which comprises a full suite of surveys and assessments, would seek full planning permission for highway/drainage infrastructure and strategic landscaping with outline planning permission being sought for the development floorspace and controlled via a series of parameter plans relating to development cells and land use; site re-profiling; building heights; building frontages; access and movement; green infrastructure and ecology; and drainage infrastructure. 3.22 The draft hybrid planning application is to be submitted in Autumn 2019. A copy of the illustrative masterplan is contained within Appendix 1. (SEE EMAIL FOR Appendix) Concept Masterplanning 3.23 To support the DSAM, Peel has development a ‘Concept Masterplan’ (CM) which articulates the strategic place-making principles covering areas identified in the DSAM including airport operations, employment development, the new central plaza, green infrastructure, ecology areas, open spaces and new housing areas. In addition to the respective planning applications, the CM demonstrates how the various land uses will be conceptually and physically integrated and connected and create high quality mixed use place. 3.24 The current version of the CM is included with this submission (Appendix 2 as a separate document) and it is the intention that it is to be updated and resubmitted to the Council once further detailed work on the housing element has been undertaken (see below). (SEE EMAIL FOR Appendix) Housing Masterplan 3.25 Landscape Master planners and Designers Randall Thorp have been commissioned by Peel to undertake a more detailed masterplan of the main housing element of the DSAM (comprising LP draft allocations 940 E2 and E3). 3.26 Housing is often an early catalyst to sustainable mixed use development propositions of the type encouraged by NPPF, helping to build confidence and momentum in wider propositions. It is therefore integral to the overall concept and attraction of the mixed use DSAM proposition. The ability to ensure early delivery of a very small proportion of the overall planned LP housing allocation will be important to unlocking the potential of DSA and ACY. The potential major employers and occupiers which are to be attracted to the ACY site, will no doubt be keen to ensure that there is a sufficient and immediate labour supply around DSA to meet some of its workforce requirements, together with quality housing provision nearby to provide potential employees with the opportunity to live close by. This will as assist in creating a community and critical mass of a working and living population which will ensure commercial viability and attractiveness of other elements of the DSAM including the proposed central plaza. 3.27 This additional housing will undoubtedly be seen as an attractive proposition for potential companies who will be considering whether to locate to DSA against a number of competitive alternative locations. Providing employment opportunities and services alongside new housing is exactly the approach which the new NPPF is directing Local Authorities to take when setting policies for major employment and housing allocations and employment. 3.28 It is also important to note that the DSAM confirms that the airport masterplan area has capacity to deliver a significant amount of housing which is over and above that which is currently envisaged in the LP. As explained further below, Peel considers that the LP should be more flexible in respect of housing delivery, in the event of DSA delivering more jobs than anticipated and/or in the event that the Borough should require further housing delivery in the absence of a five year housing land supply. Summary 3.29 The realisation of the DSAM is not waiting upon the adoption of the LP to proceed. Since the draft DSAM was published, Peel has been advancing the delivery of substantial elements of the vision and growth of DSA itself has gone from strength to strength, with record years for passengers and cargo, addition of more new passenger routes than any other UK airport, including Yorkshire’s only long-haul route with a second already committed, together with commencement of the airport’s first scheduled freight services. 3.30 These elements are important as they demonstrate a clear financial commitment from Peel to realise the DSAM vision; to deliver economic growth; and the creation of a highly sustainable and vibrant place at DSA. Collectively, these elements also demonstrate that the DSAM is suitable and deliverable.
Summary:

The airport was formerly RAF Finningley but closed in 1996 and was re-opened in 2005 commercially as Robin Hood Airport Doncaster Sheffield (now Doncaster Sheffield Airport (DSA)). It is recognised by Transport for the North as one of a network of regional airports providing international connectivity to the North of England. It is well located regionally, and is at the heart of the major motorway network. DSA has the requisite ingredients to create a highly sustainable and vibrant place centred around what is now and will continue to be, Doncaster’s and the Sheffield City Region’s largest single economic asset. It is one of the fastest growing airports in the UK and a major employer supporting over 1,000 jobs, with a 103% rise in passenger numbers 2013 - 2019. Forecasts shows 2019 will be the busiest year on record with 1.4m passengers travelling to 50 destinations. There has been a net gain of 12 destination is summer 2019, more than any other UK airport and transatlantic flights have commenced - the only long haul service in Yorkshire (to Florida, with Cancun also planned in 2020). There is also cargo capabilities, with 16,500 tonnes handled in 2018/19. The growth is lined to infrastructure investment around the airport, including the Great Yorkshire Way which has widened the catchment area of people to 5.53m. It is well placed to continue growing and capitalise on its potential. It has an enviable position under unconstrained aviation capacity for both passenger and cargo), has a catchment area larger than many other UK airports and has extensive landholdings to facilitate airport growth accompanied by supporting infrastructure, complementary land uses and a truly sustainable community. It has one of the UK’s longest runways and could facilitate, if embraced and supported, an airport equivalent to London Stanstead or even London Gatwick in their current single runway forms. It is primed for growth unrivalled by other airports. The airport has produced an airport masterplan to harness this growth, which represents a significant investment which will provide crucial infrastructure and drive job creation. The vision is to transform DSA into a national international gateway. The masterplan envisages an aerotropolis and takes account of significant land assembly since previous masterplans. It proposes: - A passenger operation of 4.6 million passengers by 2037 with potential for up to 7.2 million to be achieved in a high growth scenario - A cargo operation handling 70,000 tonnes of air cargo by 2037, with potential for up to 176,500 tonnes of air cargo in a high growth scenario; - Major terminal enhancements including doubling the size of the terminal with expanded check-in, security, departure and immigration areas - new retail facilities to enhance the customer experience; - 1.5 million sq ft of airside development including expanded cargo operations, general business aviation facilities, multi-purpose hangarage and a dedicated Maintenance Repair Overhaul (MRO) campus, incorporating a satellite of the University of Sheffield Advanced Manufacturing Research Centre (AMRC); - Over 3 million sq ft landscape ecology and advanced manufacturing space; - Up to 3,000 new homes; New retail outlets, hotels, leisure and community facilities to be provided within a central plaza which is to be the fulcrum of the community; and - A safeguarded route through the ACY site for a rail connection linking the East Coast Mainline with the Lincoln to Doncaster line, with a rail station close to both the passenger terminal and proposed central plaza area. This is forecast to result in 10,10 direct on site within the masterplan area, including the airport across the plan period, which will transform the economic landscape of Doncaster. There are also ambitions to connect to the East Coast Mainline. The airport is the borough and city regions single biggest economic asset. There is a need for planning policy to support the vision. Peel has invested £300m developing DSA and is committed to its transformation. Peel is planning to inject a further £50m into DSA itself over the next ten years to fund future capital projects / infrastructure and airline route development incentivisation, with an expectation of the airport becoming self-sustaining within the next five years or so. This includes investment in the following, some of which have been, or will be, the subject of planning applications: - Terminal improvements and extensions (planning application approved); - New departure gate bridges (planning application approved); - Expansion of the aircraft apron to provide additional aircraft stands; - Additional car parks (partly delivered under Permitted Development rights with planning applications for the remainder as envisaged in the masterplan to be submitted in October 2019); - Airline financial investment (incentivisation and airline specific marketing activity In addition to other recent investments in: - Runway resurfacing (£6m); - Cargo transit shed expansion to ensure ability to maintain rapid growth in cargo throughput (£1.6m including £1.2m grant contribution); - Complete upgrade of Hold Baggage Screening x-ray equipment in order to remain compliant with European Civil Aviation Conference (ECAC) standards (£2.2m); - Car parking expansion - premium and meet and greet infrastructure (£0.9m); and - Airline incentivisation (£1+10m) A planning application was submitted (18/02759/OUTA) for the development of 325,000m2 of high quality, state of the art advanced manufacturing and logistics floor space, precisely to show the Council and 3rd parties it is committed to seeing the delivery of employment elements of the masterplan as soon as possible. There are also plans to submit an application for a mixed use central plaza in Autumn 2019. To support the masterplan, a concept masterplan has been developed to show how all the proposed uses will integrate and create a high quality, mixed use space. Landscape master planners have also been commissioned to undertake detailed master plan of the main housing element of the masterplan, including elements included in the Local Plan (940). Housing is an early catalyst in sustainable mixed use development propositions of the type encouraged by the NPPF, helping to build confidence and momentum. It is integral to the overall concept and attraction of the mixed use proposition. Providing a small proportion of the overall amount will be important to unlocking potential and generating labour supply and creating housing for employees. It will help create community and ensure commercial viability and attractiveness of other areas of the masterplan. It will be attractive to companies seeking to locate here and fits in with the approach in the NPPF of providing housing and employment close to each other. The airport could deliver a significant amount more than what is currently proposed and the Plan should be more flexible in relation to this if more jobs are delivered or there is an absence of a 5 year supply. Peel is advancing the airport outside of the plan and not waiting for adoption to proceed. Peel are committed to economic growth and creating a sustainable place. The airport masterplan is suitable and deliverable.

Response:

Noted. The Council is broadly supportive of the ambitions of the masterplan, and through Policy 7 a holistic approach can be taken which delivers a carefully considered mixed use site. As such, 280 houses have been allowed in lieu of future delivery of jobs to help the airport to begin to realise its ambitions.
7.1 Peel strongly supports the allocation of land at DSA for the development of a new mixed use community which includes the expansion of DSA, new homes, new employment, open space and ecological networks and new central plaza. 7.2 Notwithstanding this support, Peel proposes alterations to the wording of the policy to ensure it aligns with the ambitions and objectives of the draft DSA Masterplan and the tests of soundness in accordance with the Framework. 7.3 The proposed alterations are shown in the track changes in Appendix 4; this includes amendments to the draft policy, some of its associated explanation and Appendix 3 of the LP. Where necessary further justification for the proposed alterations is provided, as follows: - The terminology applied in some parts of the policy is inconsistent with that used in the draft DSAM and/or inconsistent with the rest of the LP; changes are proposed for consistency. - Amendments to the method of calculating housing release (within Site Allocation 940 E3) relative to the creation of jobs within or attributable to the DSAM (either delivered and/or contracted to be delivered). This is required to ensure the policy is workable and effective in practice. - Policy amendments to the 'central plaza' element to reflect the emerging proposals and the in principle acceptance for the centre to include a small element of residential apartments at upper floors to support the creation of a vibrant central place. - The draft policy stipulates a maximum level of residential development (920 dwellings) to be delivered at Site Allocation 940 E3. To ensure consistency with other policies in the LP, we propose this be amended to a 'minimum' figure. If the agreed policy proposition is that housing is released to support jobs growth, there is no sound reason why there should be a cap on housing numbers should jobs growth exceed what is forecast. The policy should be amended to confirm that the housing number stipulated for the allocation is a 'minimum' so as to allow for more housing delivery in the event more jobs are secured than are forecast in the DSAM. It is Peel's contention that this shouldn't harm housing delivery elsewhere as the DSA policy is a self-fulfilling one - namely delivering the housing necessary to support the sustainable economic growth of the airport and delivery of its vision. As explained in Section 3 of these representations, sites 940 E2 and E3 have the physical capacity to deliver up to 3,000 homes. - Deletion of the requirement to provide a Strategic Delivery Plan as the policy is unclear as to the purpose of such a document. - Amendments to other elements to the policy covering master-planning, Design Code and Green Infrastructure Requirements. - Factual changes to the policy explanation. (SEE EMAIL FOR Appendices)

Summary:
Strongly support the allocation of land at DSA for a mixed use development including airport expansion, new homes, new employment, open space and ecological networks. Propose alterations to the policy to ensure it aligns with the ambitions and objectives of the masterplan and the soundness tests. Proposed amendments are provided in track changes to the policy, including: - Amendments to some terminology for consistency; - Amendments to the mechanism for housing release relative to the creation of jobs within or attributable to the master plan (delivered / contracted to be delivered). This ensures it is workable in practice; - Policy amendments to the central plaza element to reflect emerging proposals and the in principle acceptance of a small element of residential on upper floors to support vibrancy; - That 920 additional units is a minimum figure to allow for more housing should more jobs be delivered, the policy should be amended to reflect this. There is no reason that the figure should be capped. It shouldn't harm housing delivery everywhere as DSA is self fulfilling in that housing supports economic growth at the airport. The site can deliver up to 3000 homes; - Delete the requirement to provide a Strategic Delivery Plan as it is unclear what purpose it has; - Amendments related to master-planning, design code and green infrastructure requirements. - Factual changes to the policy explanation. (Appendices provided)

Response:
Support welcome. In terms of the amendments made: - the word "masterplan", as in the document to be drawn up between the Council and the Airport operator, will be replaced by the term "blueprint", which functions in exactly the same way but avoids confusion; - there will be no amendments to the mechanism. This was agreed at full Council and is the best way of ensuring that jobs will be delivered and when so they lead to houses. Jobs delivered is the clearest way this can be evidenced. The 280 houses up front is designed to help the airport begin to realise its ambition and is appropriate amount to allow for a mixed use community to begin to develop; - NPPF para. 85f and Local Plan para. 8.2.1. (Policy 24) covers residential linked to retail - the Local Plan should be read as a whole and there is no need to repeat this here; - 'Capping' the amount of homes that can come forward has been done to ensure there is some control retained on proposals here. The scale of jobs is ambitious and 1,200 homes would be the result of 10,910 jobs delivered. 1,200 homes is the scale of housing the Council are comfortable with in this location at present. Should job delivery take off in this location, the future reviews or iterations of the local plan can consider this and how to respond to it; - A strategic delivery plan allows transport implications to be assessed, planned for and mitigated as a result of development; - Modifications have been made to labelling of sites for clarity, and some other amendments as set out in the tables of amendments.
Policy 7: JobsRelHousing

5 of the plan period. This is significantly less than the 280 units indicated as a first phase of growth (Site E1) nearest to

3.50 The overall vision for DSA demonstrates the importance of the airport in boosting productivity, job creation and as a catalyst for the sub-region. The Masterplan is underpinned by the potential for the creation of up to 73,000 jobs, which reflects aspirations beyond the plan period. Policy 7 of the Pre-Submission Local Plan is underpinned by a significantly reduced estimate of the potential for jobs growth associated with the airport. This in effect relies on the assumption of only 170 jobs per annum from 2020. This figure is used to justify the initial amount of housing development in association with the DSA Masterplan. While the figures quoted in the DSA Masterplan should not necessarily form a substitute to the Local Plan’s wider evidence for overall development needs they form an important part of the context for DSA’s relationship to strategic priorities in the sub-region and the overall justification for the employment-led component of the Local Plan’s requirement for housing growth to support labour supply. This is in-turn important evidence to inform the distribution of growth to this part of the plan area. The significant ‘gap’ between the assumptions for job growth in the DSA Masterplan and the potential for development identified in Policy 7 indicate that this element of the spatial strategy is not positively prepared.

3.51 Our soundness concerns with the proposed approach to Policy 7 are that the relationship to potential jobs growth (and existing levels of employment at DSA) is based on an extremely narrow interpretation of the Draft Masterplan’s explanation of the airport’s contribution towards economic development. Page 6 of the Draft Masterplan states that the airport currently supports around 1,000 jobs, which is the figure relied upon in Policy 7 as the baseline above which future housing growth in association with delivery of the Masterplan will be supported. 3.52 The approach to identifying the ‘baseline’ in Policy 7 also wholly fails to acknowledge significant existing planning commitments that complement opportunities for jobs growth outside of the DSA Masterplan (and Local Plan allocation) boundary. The Council’s Housing and Employment Land Availability Assessment confirms 3.6ha of deliverable supply on the site of the Former Blaxton Quarry (see Policy 4). Planning permission for the site (under 09/01292/OUTM) provides indicative totals for floorspace of 215,003 sqft (19,975sqm) B2/B8/Sui Generis and 7459sqft (693sqm) B1 Offices. This would provide for an estimate of at least 375 jobs in accordance with jobs-to-floorspace densities used in the Council’s HELAA. 3.53 This interpretation of the baseline in terms of its relationship with future potential and the economic-led component of housing growth to support necessary growth in the labour force is not justified. Draft Policy 7 relies on reference to the 1,000 existing jobs figure, plus the Council’s pro-rata assumption for provision of 2,545 jobs over the whole plan period to 2035, in order to account for initial support for up to 280 homes within the DSA Masterplan (at Hurst Lane - Site E2). 3.54 This is divorced from the ‘Core growth scenario economic benefit summary’ outlined in the Draft Masterplan, which anticipates growth to 4,495 Full-Time Equivalent jobs by 2026 (DSA Draft Masterplan, 2018, p.90). 3.55 The Council provides no clear justification for how it interprets the role of the airport in the local and sub-regional economy and as a result Policy 7 does not provide a basis to assess the overall contribution to economic development. The core scenario of the DSA Masterplan provides a wider view, and recognises that a substantial proportion of this activity will be generated locally and induced by increased passenger numbers and associated visitor spending associated with use of the airport. The Draft Masterplan notes: “Based on average inbound visitor spending and assumptions regarding the proportion of spending that could be retained within Sheffield City Region, it is estimated that the spending of inbound visitors could support a further 638 gross FTE jobs annually by 2037” (DSA Draft Masterplan 2018, p.89) 3.56 This is in addition to the substantial potential for growth in permanent, FTE, jobs associated with the construction phase. While this calculation is based on development of DSA airport itself this sector of the economy will support the Local Plan’s overall requirement for growth; equally some growth in the construction workforce may take place before aspects of the DSA Masterplan are implemented. Neither of these components of economic development appear to be recognised in the Council’s Appendix 3 associated with monitoring jobs growth at DSA. (SEE EMAIL FOR Appendices) 3.57 National planning policy requires that Local Plans are reviewed at least every five years. The objective for a substantial opportunity for residential growth south of the Airport Approach Road should, as outlined in the Council’s Pre-Submission Local Plan (paragraph 5.30), form part of measures to ensure comprehensive delivery and masterplanning. The measures to control any potential additional growth in the plan period through Policy 7 and the accompanying Appendix 3 are not justified and would not be effective. This would generate significant uncertainty surrounding future monitoring requirements (in terms of measuring job growth) and barriers to implementing the policy as intended. 3.58 It is notable that the Council’s own 2018 Housing and Economic Land Availability Assessment (HELAA) indicates that for Site Ref 940 (’Poplars Farm, Hurst Lane’) only 140 should be regarded as deliverable in years 0-5 of the plan period. This is significantly less than the 280 units indicated as a first phase of growth (Site E1) nearest the approach road and indicative location for the Commercial Plaza. This strongly indicates that the future requirements for comprehensive development can most effectively be addressed as part of Local Plan review, whereas both Site E2 (as identified in the Local Plan) and the proposed additional capacity at Mosham Road provide essential opportunities to address the housing requirement upon adoption. 3.59 DSA is a focus for airport related employment growth, suited to high growth industries and logistics. The airport and hinterland is identified as being the best location for aircraft and air service related businesses. There is therefore an opportunity to provide for this expected high growth related employment within the immediate locality. 3.60 Attracting high growth industries and logistics to the area would also compliment the skills base of the existing workforce in the locality: Census (2011) information for the South East ward of Doncaster (which includes Finningley and Blaxton), indicates that there is a higher concentration of managers, professional and technical people employed and living in the south east area of Doncaster compared with other Doncaster wards. 3.61 As set out within the letter provided at Appendix 4, the Mixed Use allocation of the Mosham Road site is supported by Peel Investments, as operators of the airport site, in order to support the vision for the airport and the provision of the proposed
railway station. Recommendation Policy 7 be amended to include reference to the Housing Allocation of Site 446. Justification 3.62 To ensure accordance with the DSA Masterplan and to reflect the previously developed nature of the site, its close proximity to airport, and importantly the proposed location of the airport railway station. It is deemed the most sustainable location for which to accommodate new housing and employment development to support growth within the area. 3.63 The allocation of the site for Housing-led redevelopment under the appropriate policies will support the comprehensive regeneration of the site and the sustainable future of the village of Auckley. The additional capacity provided by the site in respect of housing provision will support the uplifted housing figure proposed within this representation in relation to Policy 3. 3.64 If the Council is not minded to accept this figure, the inclusion of the site for development under Policy 7 (i.e. in addition to the standard Local Plan figures) is also considered to be justified on the basis of supporting sustainable economic growth associated with the DSA Masterplan. These representations highlight that substantial additional benefits that would be delivered in accordance with the priorities of the Local Plan through acknowledging support for additional development compliant with the DSA Masterplan. These include prioritising brownfield land; minimising loss of Green Belt; maximising multi-modal transport choice and minimising the number and length of journeys. 3.65 This approach will ensure appropriate support for the delivery of the railway station as a key part of the DSA Masterplan, as well as the other much wider benefits outlined within this report. These amendments will also ensure the soundness of the plan.

Summary:
Re site 446 Auckley (rejected Housing site)  Policy 7 - Airport and Business Park. 1. More homes needed to support growth of the Airport. 2. Significant gap between jobs quoted in Policy and that in the DSA Masterplan (growth scenario forecasts much higher growth - potential for 73,000 jobs) 3. Support policy in principle. 4. Needs to be amended to be more flexible to support economic growth. 5. Don't agree with HELAA that site is a 'Greenfield Urban Extension' - it is BF small medium site. 6. Relationship with spatial strategy - Significant gap between jobs growth forecast in DSA masterplan and figures in Policy 7. 7. Questions the baseline jobs figure (1000). Fails to factor in existing planning permissions which could deliver a further 375 jobs. 8. Underestimates the potential for jobs growth at DSA and contribution towards economic growth. 9. Policy should be amended to include site 446.

Response:
Support for the policy generally is welcome. Policy 7 adequately supports the growth of the airport, no further housing is required in this location for this purpose, as land has been allocated that could deliver up to 1200 homes, in addition to those which already are proposed in the area - which is above Auckley - Hayfield Green's housing target (without including the allocation of site 940). It is not clear where the potential 73,000 jobs has been derived from, do not believe there is a gap between the masterplan and the Local Plan. The Local Plan facilitates housing related to 10,910 new jobs, which is in line with the figures in the draft airport masterplan. The policy supports the economic growth of the airport and the Council is supportive of this as long as it is delivered in a considered way, as set out in Policy 7. Site 446 is greenfield, and the minerals application has a remediation condition attached to it requiring its restoration. There is no need to add site 446 in to the allocations. The airport growth and housing is sufficiently covered in Policy 7 and Auckley Hayfield Green has more than sufficient housing land allocated in addition to this.
To support the representation and Inspectors understanding of the site.

South Yorkshire Housing Association

Chapter 5: Doncaster Sheffield Airport & Business Park

Tests of Soundness: Positively prepared Effective

Consistent with national

3.46 The Pre-Submission Local Plan represents an extremely narrow interpretation of the DSA Masterplan's identified potential for job growth. A key implication of this is that the approach in the Local Plan looks to divorce DSA from its role in the wider spatial strategy. This is significant because it overlooks the existing demand for jobs (and by association the requirement for homes and labour supply) associated with role of DSA as a growth driver. This also raises issues of consistency with national policy, given the ability of DSA to support a prosperous rural economy. Specifically, the spatial strategy fails to recognise that a number of settlements in close proximity to DSA, including Auckley-Hayfield and Finningley, have significant potential to support sustainable patterns of development associated with the delivery of housing and economic growth consistent with paragraphs 78 and 83 of the NPPF2019 and achievement of the airport's objectives. 3.47 It is therefore not justified that the proposed spatial strategy, and the approach to the scale and distribution of housing outlined in proposed Policy 3, does not support any contribution to the economic-led component of housing growth at Service Towns and Larger Villages in close proximity to DSA. This only applies to 'Main Towns' identified as potentially suitable to deliver up to 10% of the economic-led growth requirement. We advocate that suitable sites, sustainably located in relation to settlements at Auckley-Hayfield and Finningley, and which complement the strategy for DSA, should be identified to meet the need for jobs-led growth in the overall housing requirement. It is appropriate that such sites contribute towards the borough’s identified housing needs without delivery being directly linked to jobs growth at DSA. 3.48 The potential for such an approach was explored in the Council's 'Settlement Background Paper - Local Plan Evidence Base' (2018), however the Council rejected the argument that Auckley - Hayfield Green could be classified as a 'smaller urban area', despite previous patterns of growth and the functional relationship between the settlements. Instead a preference was stated to assess the settlements 'as is'. This assessment is considered unsound, particularly in the context of the objectives for DSA and acknowledgement of the economic-led component of housing growth. It is appropriate to revisit these conclusions in the context of the DSA Masterplan (including the delivery of new infrastructure) and our concerns regarding the overall housing requirement outlined in the SPRU Appendix. (SEE EMAIL FOR Appendices) 3.49 It should also be noted that the DSA Masterplan 2018-2037 'Interim Consultation Summary Report' (August 2018) (p.41) identifies that, in terms of demand for residential development to support the airport's objectives, surrounding settlements already demonstrate high volumes of property transactions. This is a strong indicator of local demand and reflects that pressure for housing in the local area already reflects the area's significant contribution to the wider sub-region. This is best addressed through the plan-led approach.

Summary:
It is not justified that the proposed spatial strategy, and the approach to the scale and distribution of housing outlined in proposed Policy 3, does not support any contribution to the economic-led component of housing growth at Service Towns and Larger Villages in close proximity to DSA. This only applies to 'Main Towns' identified as potentially suitable to deliver up to 10% of the economic-led growth requirement. Advocates that suitable sites, sustainably located in relation to settlements at Auckley-Hayfield and Finningley, and which complement the strategy for DSA, should be identified to meet the need for jobs-led growth in the overall housing requirement. It is appropriate that such sites contribute towards the borough’s identified housing needs without delivery being directly linked to jobs growth at DSA.

Response:
Consultation and research on the local plan indicated the most sustainable locations for growth - the Main Urban Area and Main Towns - and this is where economic led housing growth is directed to. Service Towns and Villages receive allocations to meet local needs only. That said, Auckley has an oversupply due to two permissions which are allocated, and if the potential from the airport allocations are factored in then it will deliver a level of housing in line with what a Main Town is expected to deliver, so there are no concerns that there is an undersupply of housing in this area. The Local Plan shows how jobs led growth will be met via enough allocations to meet the housing requirement in the Borough, and in the places and on the sites deemed most suitable.
Comment:

3.37 These representations endorse the support for Doncaster Sheffield Airport (DSA) outlined in the Pre-Submission Local Plan. This strategically important location is central to the strategic priorities of the plan area and delivery of the Local Plan’s objectives. However, it is necessary to highlight a number of issues of soundness regarding the relationship between DSA and the Council’s approach to the wider spatial strategy. These concerns should be read in the context of the SPRU commentary regarding the appropriateness and the housing requirement identified in the Pre-Submission Local Plan and the resulting outcomes for scale and distribution of development (see Appendix 2). (SEE EMAIL FOR APPENDICES)

3.38 This Appendix highlights the need to ensure that the number of new homes proposed in Policy 3 adequately reflects the requirement to support economic growth and availability of labour to meet the future potential for growth in the number of jobs in the borough. The Pre-Submission Local Plan should therefore support the delivery of 1,073 dwellings per annum for the full plan period 2015-2035, ensuring provision for a full 15 years following adoption. 3.39 The Council must consider a more flexible approach to the scale and distribution of growth to recognise the range of potentially suitable locations to meet development need identified under the government’s standard method plus the component of the requirement necessary to support economic growth (and ensure the delivery of affordable housing). 3.40 Policy 7 ‘Doncaster Sheffield Airport and Business Park’ is therefore supported in principle but should be modified to ensure that it is effective, positively prepared and appropriately justified. In order to achieve this, it is necessary to adopt a more flexible approach to supporting suitable areas for residential development identified in the Draft DSA Masterplan.

Summary:

Policy 7 - Airport and Business Park. 1. More homes needed to support growth of the Airport. 2. Significant gap between jobs quoted in Policy and that in the DSA Masterplan 3. Support policy in principle. 4. Needs to be amended to be more flexible to support economic growth. 5. Don’t agree with HELAA that site is a ‘Greenfield Urban Extension’ - it is BF small medium site. 6. Relationship with spatial strategy - Significant gap between jobs growth forecast in DSA masterplan and figures in Policy 7. 7. Questions the baseline jobs figure (1000). Fails to factor in existing planning permissions which could deliver a further 375 jobs. 8. Underestimates the potential for jobs growth. 9. Policy should be amended to include site 446.

Response:

Support for the policy generally is welcome. Policy 7 adequately supports the growth of the airport, no further housing is required in this location for this purpose, as land has been allocated that could deliver up to 1200 homes, in addition to those which already are proposed in the area - which is above Auckley - Hayfield Green’s housing target (without including the allocation of site 940). It is not clear where the potential 73,000 jobs has been derived from, do not believe there is a gap between the masterplan and the Local Plan. The Local Plan facilitates housing related to 10,910 new jobs, which is in line with the figures in the draft airport masterplan. The policy supports the economic growth of the airport and the Council is supportive of this as long as it is delivered in a considered way, as set out in Policy 7. Site 446 is greenfield, and the minerals application has a remediation condition attached to it requiring its restoration. There is no need to add site 446 in to the allocations. The airport growth and housing is sufficiently covered in Policy 7 and Auckley Hayfield Green has more than sufficient housing land allocated in addition to this.
3.41 Specifically, these representations demonstrate that the Local Plan should support mixed use development on land at Mosham Road and that the site should be reassessed in the context of Auckley - Hayfield's ability to support the spatial strategy in the Local Plan. 3.42 This site represents a suitable and sustainable location to meet the growth needs of existing settlements. The site is located within the DSA Masterplan area and identified as a potential location for residential development (see fig. 5). The site is also assessed in the Council's HELAA (Ref: 446) and found to be suitable for development, subject to local policy constraints. (SEE EMAIL FOR Figure 5. DSA Masterplan Area) 3.43 The HELAA identifies the site as a 'Greenfield Urban Extension', which is not justified given the Council's assessment of capacity at around 350-400 homes. This location should be regarded as a small/medium size site that will provide sustainable links to nearby Auckley and represent an appropriate contribution to the scale and distribution of growth as part of the spatial strategy. This would ensure a positively prepared response to local demand for growth. This strategy for promotion of the site at Mosham Road seeks to avoid an ad-hoc approach to development in nearby settlements that has occurred over recent years without an up-to-date plan in place. 3.44 It is therefore requested that Site 446 be identified as an allocation in the draft Local Plan contributing towards housing requirements during the plan period. This approach is consistent with the objectives of the DSA Masterplan and would overcome soundness concerns regarding the Council's proposed approach to restrict housing growth directly related to an increase in jobs at DSA. 3.45 Delivery of this site towards the Local Plan housing requirement would also support achieving the economic growth-led component of the housing requirement given the proximity to DSA and would thus complement the potential for economic development at this location. However, for the reasons outlined in the SPRU Appendix and these representations, delivery of this site should not be tied to monitoring of job growth at the airport as currently proposed in draft Policy 7. (SEE EMAIL FOR Appendices)

Summary:
Policy 7 - Airport and Business Park. 1. More homes needed to support growth of the Airport. 2. Significant gap between jobs quoted in Policy and that in the DSA Masterplan 3. Support policy in principle. 4. Needs to be amended to be more flexible to support economic growth. 5. Don't agree with HELAA that site is a 'Greenfield Urban Extension' - it is BF small medium site. 6. Relationship with spatial strategy - Significant gap between jobs growth forecast in DSA masterplan and figures in Policy 7. 7. Questions the baseline jobs figure (1000). Fails to factor in existing planning permissions which could deliver a further 375 jobs. 8. Underestimates the potential for jobs growth. 9. Policy should be amended to include site 446.

Response:
Support for the policy generally is welcome. Policy 7 adequately supports the growth of the airport, no further housing is required in this location for this purpose, as land has been allocated that could deliver up to 1200 homes, in addition to those which already are proposed in the area - which is above Auckley - Hayfield Green's housing target (without including the allocation of site 940). It is not clear where the potential 73,000 jobs has been derived from, do not believe there is a gap between the masterplan and the Local Plan. The Local Plan facilitates housing related to 10,910 new jobs, which is in line with the figures in the draft airport masterplan. The policy supports the economic growth of the airport and the Council is supportive of this as long as it is delivered in a considered way, as set out in Policy 7. Site 446 is greenfield, and the minerals application has a remediation condition attached to it requiring its restoration. There is no need to add site 446 in to the allocations. The airport growth and housing is sufficiently covered in Policy 7 and Auckley Hayfield Green has more than sufficient housing land allocated in addition to this.
Comment Ref: C/Airport and Policy 7/0734/4/001
Name: Mrs Marjorie Caygill
Date: 27/09/2019
Organisation: Auckley Parish Council
Representing:

Comment Ref: C/Airport and Policy 7/0734/4/001
Attend Examination: Written Representation

Reason:

Area: Chapter 5: Doncaster Sheffield Airport & Business Park
Policy: Policy 7: Doncaster Sheffield Airport & Business Park

Tests of Soundness:

Comment:

Auckley Parish Council's comments are as follows: There is a need to protect the environment. Council supports proposals for any necessary highways or schools. Council trusts the basic formula for the Doncaster Airport site, to determine the number of houses over the development phase, will be adhered to.

Summary:

1. There is a need to protect the environment. 2. Council supports proposals for any necessary highways or schools. 3. Council trusts the basic formula for the Doncaster Airport site, to determine the number of houses over the development phase, will be adhered to.

Response:

Policy 7 sets out at length a number of matters that must be addressed, including environmentally. The Council is confident that the Policy is clear enough in what it is asking, and that the mechanism is robust enough to function as intended - that is tha jobs delivered can lead to additional housing in this location when robustly evidenced.
As stated in our previous response, we would like to see mention of flood risk in this policy. HMOs can lead to conflict with national flood risk policy, particular in relation to conversion of existing buildings. They often involve ground floor, self-contained rooms which are not considered appropriate in areas at high flood risk, especially where sufficient mitigation and safe refuge may not be possible. We have had experience of dealing with applications proposing ground floor sleeping in areas at high residual risk which have resulted in a lot of time being taken to reach a mutually acceptable solution, and feel such situations could be avoided if a robust policy was in place in the local plan. The council has not responded to our previous representation on this matter in the consultation summary and has not made reference to it in the latest plan version. However, given the council’s reasoning for other policies, we accept that flood risk policies within the local plan will be applied.

Response:
Agree that other policies in the Local Plan would be relevant (Policy 58: Flood Risk Management) and the approach of the whole local plan has been to avoid duplication wherever possible as some of the responses have been critical of the length of the document already, but given this is such an issue for the borough then propose the following as a Main Modification: Policy 10 - Part D The existing dwelling or building is capable of conversion without causing harm to the area or the amenity of nearby residents particularly with noise and disturbances or over-looking, and in areas of flood risk do not result in ground-floor or basement level self-contained rooms, and; Explanatory text - para 6.16 This can be best achieved through preventing the over concentration of such properties in particular areas and encouraging a more even distribution across the Borough. Proposals that lead to self-contained rooms at ground floor or basement level in areas at risk of flooding are unlikely to be supported as such accommodation must be able to provide satisfactory mitigation against residual flood risk and there are likely to be challenges around providing a safe point of refuge.
Comment:

6. The Town Council is concerned about policy 10 in relation to HMO's. (Houses in Multiple Occupation). The Town Council believes that high concentrations of HMO's can be damaging to communities. This is recognised in the Local Plan however it is believed that the figure of '20' in Policy 10 E 3 and 4 is far too low and should be much higher. Local experience in Thorne suggests that the figure of 20 is not justified.

Summary:

Policy 10 o HiMO's. The figure of '20' in part E 3&4 of the Policy is to low. It should be much higher. The figure of 20 is not justified.

Response:

Changes to the Policy have been made to Part E, to specifically address concerns raised in how the policy would be applied. A suggested additional ex plantation text is now included which will apply the policy on a community-wide basis taking into the impact on rows of houses, streets and the wider area. For the avoidance of doubt this could include consideration of multiple streets and rows of properties including corner premises and need not be limited to one road at a time.
| CUSREF: 0234 | Name: DLP Planning Ltd |
| Date: 24/09/2019 | Organisation: DLP Planning Ltd |
| Representing: Mr K Honcherenko |

**Comment Ref:** /Policy 11 - Site 315/0234/2/003

**Attend Examination:** Attend Hearing

**Reason:** To support the Representations Report and the Inspector's understanding of the site.

**Area:** Chapter 6: Meeting the Need for New Homes

**Policy:** Policy 11: Residential Policy Areas

**Tests of Soundness:** Justified

**Effective**

**Comment:**

Policy 11 sets out that within Residential Policy Areas, as defined on the Policies Map: 'New residential development will be supported provided: 1. the development would provide for an acceptable level of residential amenity for both new and existing residents; and 2. the development would help protect and enhance the qualities of the existing area and contribute to a safe, healthy and prosperous neighbourhood; and 3. the development would meet other development plan policies including those relating to flood risk, open space, design and sustainable construction.' We object to the retention of site ref: 315 ‘Land west of Station Road, Blaxton’ within the Countryside Policy Area.

Reccomendation The settlement boundary for Finningley should be amended to incorporate the site. Justification The Small Sites and Settlement Boundary Review which has been undertaken to assess the development limits of settlements which fall within the Countryside Policy Area, sets out four principles for creating a development limit and deciding whether something is inside or outside of a settlement as set out below: Principle 1 - A development limit should, wherever practical, follow a tightly drawn line around the urban form of a settlement, and follow a clearly defined feature. Principle 2 - The development limit will generally be contiguous within any one settlement. However, it may be appropriate to identify two or more separate areas for a settlement due to its urban form. Principle 3 - The development limit will normally include: - Currently designated UDP residential policy area and residential curtilages (with the exception of large gardens where there is the potential to significantly extend the built form and free up opportunities for inappropriate and unsustainable back land or infill development) - Land within a village envelope, as defined by the main central contiguous built form of a settlement - Employment sites which are clearly physically related to the settlement - Brownfield’ (i.e. previously developed) Local Plan allocations (both permissions as at 1st April 2018 and new allocations) on the edge of settlements and other implemented commitments (completed planning permissions for residential or employment sites) Principle 4 - The development limit will normally exclude: - Large residential curtilages - New greenfield Local Plan development allocations, including sites with planning permission as at 1st April 2018, on the edge of settlements - Unused UDP allocations on the edges of settlements which have deliverability concerns due to issues such as flood risk and High Speed 2 (HS2) Safeguarding Route Principle 1 sets out that the development limit should follow a tightly drawn line around the urban form of the settlement and will follow a clearly defined physical feature on the ground. The existing residential development within the site clearly represents urban form and forms part of the village envelope. The site has a defined hedge line on the ground which creates a defensible boundary to the west. Despite the site possessing a large residential curtilage the site possesses a clear defined edge, which does not protrude any further into the countryside than the existing built form on the site and to the south of the site, as indicated in Fig.2. It therefore, makes logical sense to draw the development limit for Finningley in line with the extent of the site. (SEE DOCUMENT FOR Fig. 2 - Aerial view of the site and relationship with existing built form) The site has been considered suitable, developable and available and is therefore considered a sustainable form of development which makes a logical sense to draw in the village envelope to include this site.

**Summary:**

Object to site 315 being located in the Countryside, the settlement boundary of Finningley should be amended to include this site. The small sites settlement boundary review sets out 4 principles for including land within the development limit. As per principle 1, the existing residential development on the site represents the urban form and is part of the village envelope. There is a defined hedge line and therefore a defensible boundary to the west. The site does include a large residential curtilage but does not protrude any further into the countryside than the existing built form on the site or to the south. It therefore makes sense to draw the development limit in line with the extent of the site. The site is suitable, developable, available and is sustainable - the village envelope should include it.

**Response:**

The site is proposed to be excluded from the development limits as per the methodology, as it is a large garden / paddock with no built form. There is already a strong defensible boundary in this location and no justification to extend the boundary to incorporate this site.
We wish to discuss with the Inspector and Council our concerns regarding the Open Space allocation at Warmsworth. There is detailed evidence which will need to be discussed orally.

Comment:
We support this policy in principle as it is important for residential development to be supported and protected in residential areas. The only concern we have is in respect of the proposed "Local Green Space" allocations. Please see our comments to Policy 28.

Summary:
Support Policy 11 in principle as it is important for residential development to be supported and protected in residential areas. The only concern we have is in respect of the proposed "Local Green Space" allocations - comments made under Policy 28.

Response:
Noted - see response to Policy 28 in respect to this matter.
We wish to discuss with the Inspector and Council our concerns regarding the Open Space allocation at Warmsworth. There is detailed evidence which will need to be discussed orally.

We support this policy in principle as it is important for residential development to be supported and protected in residential areas. The only concern we have is in respect of the proposed "Local Green Space" allocations. Please see our comments to Policy 28.

Support Policy 11 in principle as it is important for residential development to be supported and protected in residential areas. The only concern we have is in respect of the proposed "Local Green Space" allocations - comments made under Policy 28.

Noted - see response to Policy 28 in respect to this matter.
We wish to discuss with the Inspector and Council our concerns regarding the Open Space allocation at Warmsworth. There is detailed evidence which will need to be discussed orally.

Comment:

We support this policy in principle as it is important for residential development to be supported and protected in residential areas. The only concern we have is in respect of the proposed "Local Green Space" allocations. Please see our comments to Policy 28.

Summary:

Support Policy 11 in principle as it is important for residential development to be supported and protected in residential areas. The only concern we have is in respect of the proposed "Local Green Space" allocations - comments made under Policy 28.

Response:

Noted - see response to Policy 28 in respect to this matter.
We wish to discuss with the Inspector and Council our concerns regarding the Open Space allocation at Warmsworth. There is detailed evidence which will need to be discussed orally.

Tests of Soundness:
- Positively prepared
- Effective
- Justified
- Consistent with national

Comment:
We support this policy in principle as it is important for residential development to be supported and protected in residential areas. The only concern we have is in respect of the proposed "Local Green Space" allocations. Please see our comments to Policy 28.

Summary:
Support Policy 11 in principle as it is important for residential development to be supported and protected in residential areas. The only concern we have is in respect of the proposed "Local Green Space" allocations - comments made under Policy 28.

Response:
Noted - see response to Policy 28 in respect to this matter.
Tests of Soundness:

Comment:
The Site is currently an allocated Employment Policy Area. The Site was previously occupied by industrial employment uses but was cleared of buildings approximately 10 years ago and has remained vacant ever since. The surrounding area is changing in nature from a mix of both industrial and residential uses to primarily residential uses, following the development of land to the north of the Site for residential, also within the Employment Policy Area within the adopted Policies Map. The Site has been marketed unsuccessfully for a considerable period since it became vacant, demonstrating there has been no viable interest or market demand for the Site for employment purposes over this time. It is therefore evident the Site is no longer appropriate or suitable for employment. Our clients are therefore supportive of the removal of the Site from the Employment Policy Area and the redesignation as a Residential Policy Area. This will allow the Site be developed for more appropriate uses, such as for new housing.

Summary:
Land at Watch House Lane, should be removed from Employment Policy Area and be designated as Residential Policy Area. The Site was previously occupied by industrial employment uses but was cleared of buildings approximately 10 years ago and has remained vacant ever since. The surrounding area is changing in nature from a mix of both industrial and residential uses to primarily residential uses, following the development of land to the north of the Site for residential, also within the Employment Policy Area within the adopted Policies Map. The Site has been marketed unsuccessfully for a considerable period since it became vacant, demonstrating there has been no viable interest or market demand for the Site for employment purposes over this time. It is therefore evident the Site is no longer appropriate or suitable for employment.

Response:
Noted and support welcomed
Comment Ref: C/Policy 11: 678/05304/1/004
Attend Examination: Written Representation
Reason: Tests of Soundness: Justified

Area: Chapter 6: Meeting the Need for New Homes
Policy: Policy 11: Residential Policy Areas

Test of Soundness: Justified

Comment:
The remainder of the site is allocated within the Local Plan as a Residential Policy Area. Policy 11 states that within Residential Policy Areas, new residential development will be supported provided: 1. the development would provide for an acceptable level of residential amenity for both new and existing residents; and 2. the development would help protect and enhance the qualities of the existing area and contribute to a safe, healthy and prosperous neighbourhood; and 3. the development would meet other development plan policies including those relating to flood risk, open space, design and sustainable construction. The allocation of the site as a Residential Policy Area under Policy 11 of the Publication Local Plan is supported.

Summary: Policy 11. Supportive of allocation of sites 678/927 and contribution towards objectives of Policy.

Response: Noted and support welcomed
Comment Ref: C/Policy 11: 927/05305/1/004
Attend Examination: Written Representation
Reason: Tests of Soundness: Justified
Area: Chapter 6: Meeting the Need for New Homes
Policy: Policy 11: Residential Policy Areas

Comment:
The remainder of the site is allocated within the Local Plan as a Residential Policy Area. Policy 11 states that within Residential Policy Areas, new residential development will be supported provided: 1. the development would provide for an acceptable level of residential amenity for both new and existing residents; and 2. the development would help protect and enhance the qualities of the existing area and contribute to a safe, healthy and prosperous neighbourhood; and 3. the development would meet other development plan policies including those relating to flood risk, open space, design and sustainable construction. The allocation of the site as a Residential Policy Area under Policy 11 of the Publication Local Plan is supported.

Summary:
Policy 11. Supportive of allocation of sites 678 & 927 Pastures Road and contribution towards the objectives of the Policy.

Response:
Noted and support welcomed
We note the council’s response in the consultation summary to our representation on this matter and accept the explanation given, together with the addition of paragraph 6.24.

**Policy 12 - Gypsies, Travellers & Travelling Showpeople**
- accept response and explanation provided previously and the addition of para 6.24

**Response:**
- Support welcomed
Policy 8 is not considered to be sound as it is not justified or consistent with national policy for the following reasons: Housing Mix The HBF understands the need for a mix of house size, 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. The HBF recommends 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. The HBF would also 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. The HBF consider that the Council need to be aware 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. The HBF would like to ensure 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. The HBF does not dispute the need for affordable housing within Doncaster and indeed supports the need to address the affordable housing requirements of the borough. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability. Paragraph 34 of the NPPF (2019) 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.

Summary:
Policy 8 is not considered to be sound as it is not justified or consistent with national policy. The HBF recommends 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. The HBF would also 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. The Council need to be aware 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. The HBF would like to ensure greater flexibility within this policy to acknowledge that the mix can vary both geographically and over the plan period. The HBF does not dispute the need for affordable housing within Doncaster. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability. 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.

Response:
It is not considered that the policy is overly prescriptive in respect to housing mix and the policy text refers to the need for such to be informed by latest evidence which in itself acknowledges that this may change during the lifetime of the plan. The viability testing considers a number of different viability scenarios. This includes the ‘base’ appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific ‘low-cost’ developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in.
7.1. Policy 8 seeks to ensure the right range, type, size and tenure of homes are delivered within Doncaster. Strata Homes is concerned with some aspects of this policy, and the robustness of the whole plan viability. Strata Homes therefore consider that the Policy 8 is unsound. Test of Soundness 7.2. Strata Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 7.3. Strata Homes is concerned with a number of approaches and criteria established within Policy 8. Housing Mix 7.4. Strata Homes is supportive of the principle of providing a broad mix of housing. However the Local Plan should not dictate housing mix across the borough. The local Plan should achieve this housing mix through identifying the level of provision and the broad distribution of new housing. 7.5. Importantly there does not appear to be an up to date Strategic Housing Market Assessment with the Housing Needs Survey being dated 2015 with an update in 2016. The Economic Forecasts and Housing Needs Assessment does not consider housing mix. The Housing needs survey summary 2019 (ARC4) only appears to deal with the total affordable need and size of affordable dwellings, in terms of number of bedrooms. Therefore there is a lack of evidence base for this policy approach. It is acknowledged that Appendix 4 summarises the findings of the housing need survey 2019, however the full study is not publicly available. Strata Homes reserve the right to comment further when this becomes available. 7.6. Although SHMA and Appendix 4 of the Plan, derived from the Housing Need Study 2019, considers the broad issues of housing mix, the Local Plan should not seek to control the housing mix, since it would mean that the market would be unable to adjust to changes in the market. Policy 8 seeks to specifically address the housing mix on sites. This aspect of the policy is onerous and prescriptive, particularly as it is seeking to control the size of units, mix and tenure. The policy should be amended to encourage or reflect, rather than require. 7.7. It is unclear from the Whole Plan Viability Study how the identified mix has been taken into account. An average size of dwelling of 92.90 has been assumed for the purposes of the testing. This appears to be based on a general assumption of 30% 2 bed dwellings 40% 3 bed dwellings, and 30% 4 bed dwellings. This does not align with the mix sought through the Local Plan, detailed in appendix 4 and derived from the housing needs study 2019. 7.8. Strata Homes recommend that a flexible approach is taken regarding housing mix, which recognises that the need and demand will vary from area to area and site to site, to ensure that the scheme is viable, and provides an appropriate mix for the location. There is a real need to create a housing market in Doncaster that will attract investors to Doncaster and provide an element of aspiration to ensure working people and families are retained within the area. The evidence presented in the plan is time limited, and only identifies current deficits. Strata Homes has been unable to review the full findings of the Housing Needs Study 2019, and reserves the right for further comment in this regard. However, Strata Homes considers that the mix required by policy 8 has not been appropriately tested in terms of viability and considers Policy 8 Part A to be unsound. The policy should be amended to encourage or reflect the identified mix rather than require it. Affordable housing 7.9. Strata Homes is supportive of the need for affordable housing. The Framework is however clear that affordable housing policies must not take account of need but also viability. Paragraph 34 of the Framework (2019) established the importance of viability to ensure that development identified in the Plan should not be subject to such a scale of obligations and policy burden that their ability to be delivered might be threatened. 7.10. The updated viability (2019), builds upon the earlier assessment and updates it in line with the emerging policies and the revised Framework. The assessment continues to identify three market value areas (low, medium and high) within Doncaster. 7.11. Tables 3-14 of the 2016 Viability Report show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support any level of affordable housing, whilst a number of schemes in the medium value areas would also struggle to provide the 15 percent required by this policy. 7.12. The 2016 Viability report previously concluded that sites located within high value areas are comfortably viable with the Councils proposed affordable housing provision of 25%, together with draft S106 policies. However for sites within medium to low value areas it was noted that the viability pressure was greater, and a reduced requirement should be adopted. 7.13. The 2019 Whole Plan Viability Study assesses the impact of the Plan requirements. Appendices 3 to 10 of the 2019 Whole Plan Viability Study demonstrate viability issues for a number of site typologies, including all typologies in low value areas. Typologies in low value areas were unviable when tested against the base assumptions. The study concluded that in high and medium value areas site typologies were comfortably viable. However, there are some circumstances were there are viability pressures in medium value areas, significantly the additional policy costs and sensitivities were tested against the study's base assumptions which notably included 15% affordable housing and not 23% sought by Policy 8. 7.14. Strata Homes are concerned that there is little evidence to support an affordable housing target of 15% in low value areas. Strata Homes consider that further viability evidence is required to support the target of 23% in combination with the policy requirements of the plan, including, mix, housing design standards, and density. Further there is limited justification in the Plan or associated evidence for a target of 23% affordable housing. The explanatory text states that the current need for affordable housing represents 23% of the Local Plan requirement for housing. Paragraph 6.9 states that this does not take into account current completions or viability. 7.15. Strata Homes is concerned that with all the policy requirements the Local Plan details this could undermine the provision of affordable housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is appropriately tested to ensure the sites identified and allocated are deliverable. 7.16. 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. Adaptable and Accessible Homes 7.17. Part D of the policy states that new development should aim to include the provision of homes which are adaptable, accessible and suitable for people with a wide range of needs. Strata Homes supports the adaptation of the existing stock and encouraging the provision of adaptable, accessible homes. However, as explained in response to Policy 46 Strata Homes object and does not consider it appropriate to require all developments to include this provision. Custom and Self Build Homes 7.18. Strata Homes understands the need and supports the delivery of Self-Build and Custom Build housing. Strata Homes understands the idea of increasing the self-build and custom build sector for its potential contribution to the overall housing supply. 7.19. Strata Homes consider that further evidence should be provided in respect of the level of demand in Doncaster for self and custom build and the nature of demand, including, whether those wanting to self-build would actually consider building within a larger housing development. As it stands paragraph 6.3 of the Plan provides very little explanation or evidence to support the policy. 7.20. Strata Homes consider that the requirements in Policy 8 are not justified and do not provide an appropriate strategy. Strata Homes consider that Policy 8 along with other policy requirements within the Plan could threaten the deliverability of the Plan. The Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 7.21. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 7.22. However, Strata Homes consider that with increased flexibility in Part A, revised affordable housing targets, and increased flexibility in the approach on custom and self build alongside robust evidence supporting the requirements the Local Plan can be found sound. Strata Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 7.23. To overcome the objection and address soundness matters, the Council should: - Policy 8 Part A should be amended to so that developers are encouraged to reflect the identified mix on schemes rather than require it”. - Review the approach to affordable housing to ensure it reflects the new Framework (2019) and that the evidence base and viability approach is robust and credible. - Include a flexible approach on accessible and adaptable homes and ensure the evidence base is robust and credible. - Include a flexible approach on custom build and self-build homes and ensure the evidence base is robust and credible.

**Summary:**

Strata Homes is concerned with a number of approaches and criteria established within Policy 8. Housing Mix There is a lack of evidence base for this policy approach which is not based on an up to date Strategic Housing Market Assessment with the Housing Needs Survey being dated 2015 with an update in 2016. Policy 8 seeks to specifically address the housing mix on sites. This aspect of the policy is onerous and prescriptive, particularly as it is seeking to control the size of units, mix and tenure. The policy should be amended to encourage or reflect, rather than require. It is unclear from the Whole Plan Viability Study how the identified mix has been taken into account. An average size of dwelling of 92.90 has been assumed for the purposes of the testing. This appears to be based on a general assumption of 30% 2 bed dwellings 40 % 3 bed dwellings, and 30 % 4 bed dwellings. This does not align with the mix sought through the Local Plan, detailed in appendix 4 and derived from the housing needs study 2019. Strata Homes recommend that a flexible approach is taken regarding housing mix, which recognises that the need and demand will vary from area to area and site to site, to ensure that the scheme is viable, and provides an appropriate mix for the location. Strata Homes considers that the mix required by policy 8 has not been appropriately tested in terms of viability and considers Policy 8 Part A to be unsound. Affordable housing The 2016 Viability report previously concluded that sites located within high value areas are comfortably viable with the Councils proposed affordable housing provision of 25%, together with draft S106 policies. However for sites within medium to low value areas it was noted that the viability pressure was greater, and a reduced requirement should be adopted. The 2019 Whole Plan Viability Study assesses the impact of the Plan requirements. Typologies in low value areas were unviable when tested against the base assumptions. The study concluded that in high and medium value areas site typologies were comfortably viable. However, there are some circumstances were there are viability pressures in medium value areas, significantly the additional policy costs and sensitivities were tested against the study's base assumptions which notably included 15% affordable housing and not 23% sought by Policy 8. Strata Homes are concerned that there is little evidence to support an affordable housing target of 15% in low value areas. Strata Homes consider that further viability evidence is required to support the target of 23% in combination with the policy requirements of the plan, including, mix, housing design standards, and density. Further there is limited justification in the Plan or associated evidence for a target of 23% affordable housing. The explanatory text states that the current need for affordable housing represents 23% of the Local Plan requirement for housing. Paragraph 6.9 states that this does not take into account current completions or viability. Strata Homes is concerned that with all the policy requirements the Local Plan details this could undermine the provision of affordable housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is appropriately tested to ensure the sites identified and allocated are deliverable. 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. Adaptable and Accessible Homes Part D of the policy states that new development should aim to include the provision of homes which are adaptable, accessible and suitable for people with a wide range of needs. Strata Homes supports the adaptation of the existing stock and encouraging the provision of adaptable, accessible homes. However, as explained in response to Policy 46 Strata Homes object and does not consider it appropriate to require all developments to include this provision. Custom and Self Build Homes Further evidence should be provided in respect of the level of demand in Doncaster for self and custom build and the nature of demand, including, whether those wanting to self-build would actually consider building within a larger housing development. As it stands paragraph 6.3 of the Plan provides very little explanation or evidence to support the policy. The requirements in Policy 8 are not justified and do not provide an appropriate strategy. Policy 8, along with other policy requirements within the Plan, could threaten the deliverability of the Plan. The Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. However, Strata Homes consider that with increased flexibility in Part A, revised affordable housing targets, and increased flexibility in the approach on custom and self build alongside robust evidence supporting the requirements the Local Plan can be found sound. Strata Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. To overcome the objection and address soundness matters, the Council should: - Policy 8 Part A should be amended to so that developers are encouraged to reflect the identified mix on schemes rather than require it”. - Review the approach to affordable housing to ensure it reflects the new Framework (2019) and that the evidence base and viability approach is robust and credible. - Include a flexible approach on accessible and adaptable homes and ensure the evidence base is robust and credible. - Include a flexible approach on custom build and self-build homes and ensure the evidence base is robust and credible.
Policy 8: Delivering the Necessary Range of Housing

Comment:
Policy 8 states that developments will be required to deliver a mix of house types, sizes and tenures. Gladman recommends that the policy takes a flexible, non-prescriptive approach to housing mix, which recognises that demand and need will vary from area to area and on a site-by-site basis. We consider that this approach would ensure that sustainable development opportunities are not prevented from coming forward over concerns regarding potential viability issues. The Council also need to be aware that the latest Housing Need Assessment (HNA) will only ever identify current deficits and reflect a snapshot in time. Therefore, even the latest HNA may not reflect the up-to-date situation at the time of an application. Gladman recommend greater flexibility within this policy to acknowledge that the mix can change from site-to-site and over any given period. The policy requires all development proposals for 15 or more dwellings in the Borough's high value market areas to provide a 23% proportion of affordable homes and, a 15% proportion of affordable homes in other areas. Gladman are fully supportive of the intention to deliver affordable housing across the Borough. The NPPF 2018 makes it clear that affordable housing policies must not only take account of need but also of viability. Paragraph 34 of the NPPF (2019) established 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. Gladman note that within the Council's own Viability Report, specifically in Tables 3-14, it is demonstrated that a number of the schemes in the low value areas are not able to support any level of affordable housing, whilst a number of schemes in the medium value areas would also struggle to provide the 15% required by this policy. The Council should be mindful of that it is unrealistic to negotiate every site on a policy basis if the base-line aspiration of a policy, or combination of policies, is set so high as to jeopardise future housing delivery. Therefore, case-by-case negotiations on these sites should occur as the exception, rather than the rule. Gladman also suggest that the Council take into consideration the amendments to the definition of affordable homes and their provision, as set out in the NPPF2019 Appendix 2.

Summary:
Gladman recommends Policy 8 takes a flexible, non-prescriptive approach to housing mix, which recognises that demand and need will vary from area to area and on a site-by-site basis. Such an approach would ensure that sustainable development opportunities are not prevented from coming forward over concerns regarding potential viability issues. The latest Housing Need Assessment (HNA) will only ever identify current deficits and reflect a snapshot in time - therefore greater flexibility within this policy is needed to acknowledge that the mix can change from site-to-site and over any given period. Gladman are fully supportive of the intention to deliver affordable housing across the Borough. However, it is noted that the Council's own Viability Report (Tables 3-14) demonstrate that a number of the schemes in the low value areas are not able to support any level of affordable housing, whilst a number of schemes in the medium value areas would also struggle to provide the 15% required by this policy. The Council should be mindful of that it is unrealistic to negotiate every site on a case-by-case basis if the base-line aspiration of a policy, or combination of policies, is set so high as to jeopardise future housing delivery. Therefore, case-by-case negotiations on these sites should occur as the exception, rather than the rule. It is also suggested that the Council take into consideration the amendments to the definition of affordable homes and their provision, as set out in the NPPF 2019 Appendix 2.

Response:
It is not considered that the policy is overly prescriptive in respect to housing mix and the policy text refers to the need for such to be informed by latest evidence which in itself acknowledges that this may change during the lifetime of the plan. The viability testing considers a number of different viability scenarios. This includes the 'base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost' developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in. NPPF is clear in the support for custom and self build housing and the Council maintains a Register of any such interest and the policy seeks to 'encourage' such policy and is not mandatory.

Response:
The viability testing considers a number of different viability scenarios. This includes the 'base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost' developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in.
3.21 Policy 8 sets out that 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 / Study (or other robust evidence). b) There is a clear requirement for the provision of affordable housing to meet local needs in each individual community. Housing sites of 15 or more homes (or 0.5Ha or above) will normally be expected to include 23% affordable homes in the Borough’s high value housing market areas (as defined in explanatory text below), or a lower requirement of 15% elsewhere in the Borough (including starter homes / discounted market sales housing which meet the definition in the NPPF) on-site. Proposals for affordable housing on developments of less than 15 units will be supported where these meet other development plan policies. c) Commuted sums in lieu of on-site affordable housing provision and of broadly equivalent value will only be accepted where this is robustly justified. These commuted sums will be used to target areas of need in the Borough in order to assist with rebalancing the housing market. They may also be combined with council house building programmes that would take place on land that the council owns or subsequently needs to acquire. d) In order to provide the necessary housing supply required for the changing needs of residents and to support independent living, new developments should include the provision of homes which are adaptable, accessible, and suitable for people with a wide range of needs in line with Policy 46. It must also be demonstrated how the provision of housing types suitable for older people can be increased, especially bungalows, extra care facilities and supported living accommodation. These will be supported on sites suitable for housing and which have good access to local services and facilities by means other than private car. e) Specialist student accommodation will be supported on sites with walk/cycle and/or public transport access to Doncaster College or other training facilities. Wherever possible, commuted sums relating to such accommodation will be used to target areas of need in the Borough. f) The provision of opportunities to accommodate custom build and self-build homes will be encouraged on housing allocations and elsewhere. 3.22 The supporting text for Policy 8 sets out that the required affordable housing percentages have been determined from the Doncaster Local Plan Viability Testing (2016) evidence base. 3.23 It is of note that there is no specific mention within the policy itself of the affordable housing requirement being subject to viability testing. However, Policy 67 (Development Viability (Strategic Policy)) states the following with regard to such testing: Where the applicant can demonstrate that particular circumstances justify the need for a Viability Appraisal, the Council will take a pragmatic and flexible approach to planning obligations and consider their genuine impact on viability of development proposals on an independent and case by case basis, at the applicant’s expense, and in line with the following principles: a) Development which is unable to make the full contribution at the point at which the application is submitted may be supported where: 1. a robust and fit for purpose viability assessment shows that the full contribution would make the development unviable; 2. the possibilities for reduced, deferred or phased contributions have been fully explored; and, 3. it can be demonstrated that the wider benefits of the scheme outweigh its lower level of contribution. b) Where a lower level of contribution is agreed, this may be subject to reassessment once the development commences and / or any other suitable trigger point(s) as appropriate and agreed between the Council and the applicant. 3.24 In principle, the setting out of an affordable housing requirement as in Policy 8 is supported, subject to the inclusion of a direct reference to Policy 67. Reason for Amendment 3.25 The Council should include a reference to Policy 67 to ensure clarity in the application of this policy.

Summary:
Setting our an affordable housing requirement as in Policy 8 is supported in principle, subject to the inclusion of direct reference to Policy 67 to ensure clear policy application.

Response:
Support for the principle of the policy welcomed. It is not considered that there needs to be cross-reference to Policy 67: Development Viability as the introduction to the Local plan itself at para 1.14 is explicitly clear that all the policies should be read together and that individual policies do not necessarily refer to other relevant policies.
2.30 Policy 8 sets out that 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 / Study (or other robust evidence). b) There is a clear requirement for the provision of affordable housing to meet local needs in each individual community. Housing sites of 15 or more homes (or 0.5Ha or above) will normally be expected to include 23% affordable homes in the Borough’s high value housing market areas (as defined in explanatory text below), or a lower requirement of 15% elsewhere in the Borough (including starter homes / discounted market sales housing which meet the definition in the NPPF) on-site. Proposals for affordable housing on developments of less than 15 units will be supported where these meet other development plan policies. c) Commuted sums in lieu of on-site affordable housing provision and of broadly equivalent value will only be accepted where this is robustly justified. These commuted sums will be used to target areas of need in the Borough in order to assist with rebalancing the housing market. They may also be combined with council house building programmes that would take place on land that the council owns or subsequently needs to acquire. d) In order to provide the necessary housing supply required for the changing needs of residents and to support independent living, new developments should include the provision of homes which are adaptable, accessible, and suitable for people with a wide range of needs in line with Policy 46. It must also be demonstrated how the provision of housing types suitable for older people can be increased, especially bungalows, extra care facilities and supported living accommodation. These will be supported on sites suitable for housing and which have good access to local services and facilities by means other than private car. e) Specialist student accommodation will be supported on sites with walk/cycle and/or public transport access to Doncaster College or other training facilities. Wherever possible, commuted sums relating to such accommodation will be used to target areas of need in the Borough. f) The provision of opportunities to accommodate custom build and self-build homes will be encouraged on housing allocations and elsewhere. 2.31 The supporting text for Policy 8 sets out that the required affordable housing percentages have been determined from the Doncaster Local Plan Viability Testing (2016) evidence base. 2.32 It is of note that there is no specific mention within the policy itself of the affordable housing requirement being subject to viability testing. However, Policy 67 (Development Viability (Strategic Policy)) states the following with regard to such testing: Where the applicant can demonstrate that particular circumstances justify the need for a Viability Appraisal, the Council will take a pragmatic and flexible approach to planning obligations and consider their genuine impact on viability of development proposals on an independent and case by case basis, at the applicant’s expense, and in line with the following principles: a) Development which is unable to make the full contribution at the point at which the application is submitted may be supported where: 1. a robust and fit for purpose viability assessment shows that the full contribution would make the development unviable; 2. the possibilities for reduced, deferred or phased contributions have been fully explored; and, 3. it can be demonstrated that the wider benefits of the scheme outweigh its lower level of contribution. b) Where a lower level of contribution is agreed, this may be subject to reassessment once the development commences and / or any other suitable trigger point(s) as appropriate and agreed between the Council and the applicant. 2.33 In principle, the setting out of an affordable housing requirement as in Policy 8 is supported, subject to the inclusion of a direct reference to Policy 67. Reason for Amendment 2.34 The Council should include a reference to Policy 67 to ensure clarity in the application of this policy.
| Reason: | We act for a number of major land owners in the Doncaster area, we have detailed knowledge of the sites and the planning history of the Borough. We have previously been involved with the Core Strategy Plan and with the Examination of the draft Sites and Policies DPD. Our knowledge of the various land parcels, ownerships, the strategic land position and site specific details, means that we have information to inform the debate regarding the overall housing requirement and the specific allocation of sites which will assist the examination. |
| Area: | Chapter 6: Meeting the Need for New Homes |
| Policy: | Policy 8: Delivering the Necessary Range of Housing |
| Tests of Soundness: | Positively prepared | Effective | Legally Compliant |
| Comment: | Objection is made to this Policy as drafted, the requirement for 23% affordable homes in the higher value areas in the District is not justified by the evidence. It is noted in para 6.9 that the overall requirement for 209 units per annum, which is 23% of the annual housing target [believed to be the upper end of the range] does not take account of what has been committed through applications and is therefore an unreliable figure. The Plan should include a robust figure, and needs to include text that makes it clear that the affordable housing has to be viable. Viability testing on sites at this stage will be unreliable until a full suite of technical documents have assessed the site development costs and infrastructure requirements. The Plan should therefore reflect affordable housing requirements as aspirational but subject to detailed site viability. PROPOSED CHANGE 7. Provide a robust figure for affordable housing. As explained in detail above. |
| Summary: | Objects to policy - 23% affordable housing requirement is not justified by the evidence. 209 units/annum affordable does not take account of permissions so is an unreliable figure. The Plan should include a robust figure and the text make clear that affordable housing has to be viable. Testing sites at this stage will be unreliable until full technical studies have assessed development costs and infrastructure requirements. Should therefore reflect affordable housing requirements as aspirational but subject to detailed site viability. Proposed change - provide a robust figure for affordable housing. |
| Response: | The 23% affordable housing ask in the higher value areas is a viability-led target rather than being a solely needs-led requirement which reflects NPPF’s emphasis on the need for policies to be viable. Changes to national policy and guidance is clear that there is a need to frontload viability at plan-making stage and the need for viability appraisals as part of decision-taking will then become less of the norm. The Local Plan still however includes a policy (Policy 67) in respect to viability and all policies in the plan should be read as a whole. The viability testing evidence base has been prepared in line with all the relevant guidance and this includes assessing a number of allocations as well as hypothetical sites. |
Comment Ref: C/Policy 8/03431/1/006

Attend Examination: Attend Hearing

Reason: We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Area: Chapter 6: Meeting the Need for New Homes

Policy: Policy 8: Delivering the Necessary Range of Housing

Tests of Soundness: Positively prepared

Consistent with national

Comment:
The affordable housing requirements set out in this policy are not based upon robust evidence. It is therefore not justified and unsound. The requirement of 15% affordable housing on site in areas of low value does not reflect the evidence provided in the Whole Plan Viability Study. The study states that 'viability pressure is at its highest in low value locations. Viable schemes are shown for Greenfield sites with a 15% affordable housing provision, however, this is on the basis that all affordable housing is provided as affordable home ownership tenures and S. 106 obligation costs are reduced to #3,359 per dwelling - half of the baseline testing. Brownfield variations generally return unviable outcomes even with the aforementioned adjustments. The policy is ignoring signals from the evidence which is clear that providing 15% affordable housing in low cost areas will prevent sites from being viable. The policy is unsound as it is not based upon robust evidence and because it is also not positively prepared or consistent with national policy when assessed against the NPPF (paragraph 16) which states that plans should be prepared in a way that is aspirational but deliverable.

Summary:
The affordable housing requirements set out in Policy 8 are not based upon robust evidence and is ignoring signals in the Whole Plan Viability Study which is clear that providing 15% affordable housing in low cost areas will prevent sites from being viable. Viable schemes are shown for Greenfield sites with a 15% affordable housing provision. However, this is on the basis that all affordable housing is provided as affordable home ownership tenures and S. 106 obligation costs are reduced to #3,359 per dwelling - half of the baseline testing. Brownfield variations generally return unviable outcomes even with the aforementioned adjustments.

Response:
The viability testing considers a number of different viability scenarios. This includes the 'base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost' developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in.
Comment: Objection is made to this Policy as drafted, the requirement for 23% affordable homes in the higher value areas in the District is not justified by the evidence. It is noted in para 6.9 that the overall requirement for 209 units per annum, which is 23% of the annual housing target [believed to be the upper end of the range] does not take account of what has been committed through applications and is therefore an unreliable figure. The Plan should include a robust figure, and needs to include text that makes it clear that the affordable housing has to be viable. Viability testing on sites at this stage will be unreliable until a full suite of technical documents have assessed the site development costs and infrastructure requirements. The Plan should therefore reflect affordable housing requirements as aspirational but subject to detailed site viability. PROPOSED CHANGE 6. Provide a robust figure for affordable housing. As explained in detail above.

Summary: Objects to 23% affordable housing requirement as this is not justified by the evidence. The reference in para 6.9 to 209 units/annum does not take account of commitments so is an unreliable figure. The Plan should include a robust figure and make clear that affordable housing has to be viable. Testing sites at this stage will be unreliable until a full suite of technical documents have assessed site development costs and infrastructure requirements. Proposed change - provide a robust figure for affordable housing.

Response: The 23% affordable housing ask in the higher value areas is a viability-led target rather than being a solely needs-led requirement which reflects NPPF’s emphasis on the need for policies to be viable. Changes to national policy and guidance is clear that there is a need to frontload viability at plan-making stage and the need for viability appraisals as part of decision-taking will then become less of the norm. The Local Plan still however includes a policy (Policy 67) in respect to viability and all policies in the plan should be read as a whole. The viability testing evidence base has been prepared in line with all the relevant guidance and this includes assessing a number of allocations as well as hypothetical sites.
2.65 Policy 8 sets out that 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 / Study (or other robust evidence). b) There is a clear requirement for the provision of affordable housing to meet local needs in each individual community. Housing sites of 15 or more homes (or 0.5Ha or above) will normally be expected to include 23% affordable homes in the Borough’s high value housing market areas (as defined in explanatory text below), or a lower requirement of 15% elsewhere in the Borough (including starter homes / discounted market sales housing which meet the definition in the NPPF) on-site. Proposals for affordable housing on developments of less than 15 units will be supported where these meet other development plan policies. c) Commuted sums in lieu of on-site affordable housing provision and of broadly equivalent value will only be accepted where this is robustly justified. These commuted sums will be used to target areas of need in the Borough in order to assist with rebalancing the housing market. They may also be combined with council house building programmes that would take place on land that the council owns or subsequently needs to acquire. d) In order to provide the necessary housing supply required for the changing needs of residents and to support independent living, new developments should include the provision of homes which are adaptable, accessible, and suitable for people with a wide range of needs in line with Policy 46. It must also be demonstrated how the provision of housing types suitable for older people can be increased, especially bungalows, extra care facilities and supported living accommodation. These will be supported on sites suitable for housing and which have good access to local services and facilities by means other than private car. e) Specialist student accommodation will be supported on sites with walk/cycle and/or public transport access to Doncaster College or other training facilities. Wherever possible, commuted sums relating to such accommodation will be used to target areas of need in the Borough. f) The provision of opportunities to accommodate custom build and self-build homes will be encouraged on housing allocations and elsewhere.”

2.66 The supporting text for Policy 8 sets out that the required affordable housing percentages have been determined from the Doncaster Local Plan Viability Testing (2016) evidence base. 2.67 It is of note that there is no specific mention within the policy itself of the affordable housing requirement being subject to viability testing. However, Policy 67 (Development Viability (Strategic Policy)) states the following with regard to such testing: “Where the applicant can demonstrate that particular circumstances justify the need for a Viability Appraisal, the Council will take a pragmatic and flexible approach to planning obligations and consider their genuine impact on viability of development proposals on an independent and case by case basis, at the applicant’s expense, and in line with the following principles: a) Development which is unable to make the full contribution at the point at which the application is submitted may be supported where: 1. a robust and fit for purpose viability assessment shows that the full contribution would make the development unviable; 2. the possibilities for reduced, deferred or phased contributions have been fully explored; and, 3. it can be demonstrated that the wider benefits of the scheme outweigh its lower level of contribution. b) Where a lower level of contribution is agreed, this may be subject to reassessment once the development commences and / or any other suitable trigger point(s) as appropriate and agreed between the Council and the applicant.” 2.68 In principle, the setting out of an affordable housing requirement as in Policy 8 is supported, subject to the inclusion of a direct reference to Policy 67. Recommendation 2.69 Policy 8 to include direct reference to the need to consider viability, in accordance with Policy 67. Justification 2.70 The Council should include a reference to Policy 67 to ensure clarity in the application of this policy and to ensure that the plan remains viable and deliverable, as therefore sound, within the plan period.

Summary:
Policy 8. there is no mention within the policy 8 regarding affordable housing requirement being subject to viability testing. It is acknowledged that policy 67 covers viability. Policy 8 to include direct reference to the need to consider viability, in accordance with Policy 67.

Response:
Support for the principle of the policy welcomed. It is not considered that there needs to be cross-reference to Policy 67: Development Viability as the introduction to the Local plan itself at para 1.14 is explicitly clear that all the policies should be read together and that individual policies do not necessarily refer to other relevant policies.
7.1. Policy 8 seeks to ensure the right range, type, size and tenure of homes are delivered within Doncaster. H. Burtwistle & Son is concerned with some aspects of this policy, and the robustness of the whole plan viability. H. Burtwistle & Son therefore consider that the Policy 8 is unsound. Test of Soundness 7.2. H. Burtwistle & Son considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 7.3. H. Burtwistle & Son is concerned with a number of approaches and criteria established within Policy 8. Housing Mix 7.4. H. Burtwistle & Son is supportive of the principle of providing a broad mix of housing. However the Local Plan should not dictate housing mix across the borough. The local Plan should achieve this housing mix through identifying the level of provision and the broad distribution of new housing. 7.5. Importantly there does not appear to be an up to date Strategic Housing Market Assessment with the Housing Needs Survey being dated 2015 with an update in 2016. The Economic Forecasts and Housing Needs Assessment does not consider housing mix. The Housing needs survey summary 2019 (ARC4) only appears to deal with the total affordable need and size of affordable dwellings, in terms of number of bedrooms. Therefore there is a lack of evidence base for this policy approach. It is acknowledged that Appendix 4 summarises the findings of the housing need survey 2019, however the full study is not publically available. H. Burtwistle & Son reserve the right to comment further when this becomes available. 7.6. Although SHMA and Appendix 4 of the Plan, derived from the Housing Need Study 2019, considers the broad issues of housing mix, the Local Plan should not seek to control the housing mix on sites. This aspect of the policy is onerous and prescriptive, particularly as it is seeking to control the size of units, mix and tenure. The policy should be amended to encourage or reflect, rather than require. 7.7. It is unclear from the Whole Plan Viability Study how the identified mix has been taken into account. An average size of dwelling of 92.90 has been assumed for the purposes of the testing. This appears to be based on a general assumption of 30% 2 bed dwellings 40 % 3 bed dwellings, and 30 % 4 bed dwellings. This does not align with the mix sought through the Local Plan, detailed in appendix 4 and derived from the housing needs study 2019. 7.8. H. Burtwistle & Son recommend that a flexible approach is taken regarding housing mix, which recognises that the need and demand will vary from area to area and site to site, to ensure that the scheme is viable, and provides an appropriate mix for the location. There is a real need to create a housing market in Doncaster that will attract investors to Doncaster and provide an element of aspiration to ensure working people and families are retained within the area. The evidence presented in the plan is time limited, and only identifies current deficits. H. Burtwistle & Son has been unable to review the full findings of the Housing Needs Study 2019, and reserves the right for further comment in this regard. However, H. Burtwistle & Son consider that the mix required by policy 8 has not been appropriately tested in terms of viability and considers Policy 8 Part A to be unsound. The policy should be amended to encourage to reflect the identified mix rather than require it. Affordable housing 7.9. H. Burtwistle & Son is concerned with a number of approaches and criteria established within Policy 8. The Framework is however clear that affordable housing policies must not only take account of need but also viability. Paragraph 34 of the Framework (2019) established the importance of viability to ensure that development identified in the Plan should not be subject to such a scale of obligations and policy burden that their ability to be delivered might be threatened. 7.10. The updated viability (2019), builds upon the earlier assessment and updates it in line with the emerging policies and the revised Framework. The assessment continues to identify three market value areas (low, medium and high) within Doncaster. 7.11. Tables 3-14 of the 2016 Viability Report show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support any level of affordable housing, whilst a number of schemes in the medium value areas would also struggle to provide the 15 percent required by this policy. 7.12. The 2016 Viability report previously concluded that sites located within high value areas are comfortably viable with the Councils proposed affordable housing provision of 25%, together with draft S106 policies. However for sites within medium to low value areas it was noted that the viability pressure was greater, and a reduced requirement should be adopted. 7.13. The 2019 Whole Plan Viability Study assesses the impact of the Plan requirements. Appendices 3 to 10 of the 2019 Whole Plan Viability Study demonstrate viability issues for a number of site typologies, including all typologies in low value areas. Typologies in low value areas were unviable when tested against the base assumptions. The study concluded that in high and medium value areas site typologies were comfortably viable. However, there are some circumstances were there are viability pressures in medium value areas, significantly the additional policy costs and sensitivities were tested against the study’s base assumptions which notably included 15% affordable housing and not 23% sought by Policy 8. 7.14. H. Burtwistle & Son are concerned that there is little evidence to support an affordable housing target of 15% in low value areas. H. Burtwistle & Son consider that further viability evidence is required to support the target of 23% in combination with the policy requirements of the plan, including, mix, housing design standards, and density. Further there is limited justification in the Plan or associated evidence for a target of 23% affordable housing. The explanatory text states that the current need for affordable housing represents 23% of the Local Plan requirement for housing. Paragraph 6.9 states that this does not take into account current completions or viability. 7.15. H. Burtwistle & Son is concerned that with all the policy requirements the Local Plan details this could undermine the provision of affordable housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is appropriately
tested to ensure the sites identified and allocated are deliverable. 7.16. 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. 7.17. Part D of the policy states that new development should aim to include the provision of homes which are adaptable, accessible and suitable for people with a wide range of needs. H. Burtwistle & Son supports the adaptation of the existing stock and encouraging the provision of adaptable, accessible homes. However, as explained in response to Policy 46 H. Burtwistle & Son object and does not consider it appropriate to require all developments to include this provision. 7.18. H. Burtwistle & Son understands the need and supports the delivery of Self-Build and Custom Build housing. H. Burtwistle & Son understands the idea of increasing the self-build and custom build sector for its potential contribution to the overall housing supply. 7.19. H. Burtwistle & Son consider that further evidence should be provided in respect of the level of demand in Doncaster for self and custom build and the nature of demand, including, whether those wanting to self-build would actually consider building within a larger housing development. As it stands paragraph 6.3 of the Plan provides very little explanation or evidence to support the policy. 7.20. H. Burtwistle & Son consider that the requirements in Policy 8 are not justified and do not provide an appropriate strategy. H. Burtwistle & Son consider that Policy 8 along with other policy requirements within the Plan could threaten the deliverability of the Plan. The Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 7.21. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 7.22. However, H. Burtwistle & Son consider that with increased flexibility in Part A, revised affordable housing targets, and increased flexibility in the approach on custom and self build alongside robust evidence supporting the requirements the Local Plan can be found sound. H. Burtwistle & Son will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 7.23. To overcome the objection and address soundness matters, the Council should: - Policy 8 Part A should be amended to so that developers are encouraged to reflect the identified mix on schemes rather than require it”. - Review the approach to affordable housing to ensure it reflects the new Framework (2019) and that the evidence base and viability approach is robust and credible. - Include a flexible approach on accessible and adaptable homes and ensure the evidence base is robust and credible. - Include a flexible approach on custom build and self-build homes and ensure the evidence base is robust and credible.

Summary:

Housing Mix. 1. Lack of evidence for approach taken. 2. Local Plan should not seek to control the housing mix - to prescriptive. 3. This aspect of policy should 'encourage' rather than 'require'. 4. Flexible approach should be taken - need to vary rea to area. 5. Mix in Policy has not been appropriately viability tested. Affordable Housing. 1. Little evidence to support target of 15% in low value areas. 2. Little justification of the 23% target. 3. The need for regular viability assessment could undermine deliverability. 4. Unrealistic to negotiate each site on a one by one basis - could jeopardise delivery. 5. Policy needs to reflect NPPF 2019. 6. Adaptable and Accessible Homes. 1. Re Part D 2. Support principles of policy but does not consider it appropriate to require all developments to include this provision. 3. Should be a more flexible approach, Custom and self-Build Homes 1. Further evidence needed of the level of demand. 2. Para 6.3 provides little explanation as to evidence to support the policy. 3. Should be a more flexible approach.

Response:

The viability testing considers a number of different viability scenarios. This includes the 'base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost' developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in. NPPF is clear in the support for custom and self-build housing and the Council maintains a Register of any such interest and the policy seeks to 'encourage' such opportunities and is not mandatory.
7.1. Policy 8 seeks to ensure the right range, type, size and tenure of homes are delivered within Doncaster. H. Burtwistle & Son is concerned with some aspects of this policy, and the robustness of the whole plan viability. H. Burtwistle & Son therefore consider that the Policy 8 is unsound. Test of Soundness 7.2. H. Burtwistle & Son considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 7.3. H. Burtwistle & Son is concerned with a number of approaches and criteria established within Policy 8. Housing Mix 7.4. H. Burtwistle & Son is supportive of the principle of providing a broad mix of housing. However the Local Plan should not dictate housing mix across the borough. The local Plan should achieve this housing mix through identifying the level of provision and the broad distribution of new housing. 7.5. Importantly there does not appear to be an up to date Strategic Housing Market Assessment with the Housing Needs Survey being dated 2015 with an update in 2016. The Economic Forecasts and Housing Needs Assessment does not consider housing mix. The Housing needs survey summary 2019 (ARCA) only appears to deal with the total affordable need and size of affordable dwellings, in terms of number of bedrooms. Therefore there is a lack of evidence base for this policy approach. It is acknowledged that Appendix 4 summarises the findings of the housing need survey 2019, however the full study is not publicly available. H. Burtwistle & Son reserve the right to comment further when this becomes available. 7.6. Although SHMA and Appendix 4 of the Plan, derived from the Housing Need Study 2019, considers the broad issues of housing mix, the Local Plan should not seek to control the housing mix on sites. This aspect of the policy is onerous and prescriptive, particularly as it is seeking to control the size of units, mix and tenure. The policy should be amended to encourage or reflect, rather than require. 7.7. It is unclear from the Whole Plan Viability Study how the identified mix has been taken into account. An average size of dwelling of 92.90 has been assumed for the purposes of the testing. This appears to be based on a general assumption of 30% 2 bed dwellings 40% 3 bed dwellings, and 30% 4 bed dwellings. This does not align with the mix sought through the Local Plan, detailed in appendix 4 and derived from the housing needs study 2019. 7.8. H. Burtwistle & Son recommend that a flexible approach is taken regarding housing mix, which recognises that the need and demand will vary from area to area and site to site, to ensure that the scheme is viable, and provides an appropriate mix for the location. There is a real need to create a housing market in Doncaster that will attract investors to Doncaster and provide an element of aspiration to ensure working people and families are retained within the area. The evidence presented in the plan is time limited, and only identifies current deficits. H. Burtwistle & Son has been unable to review the full findings of the Housing Needs Study 2019, and reserves the right for further comment in this regard. However, H. Burtwistle & Son consider that the mix required by policy 8 has not been appropriately tested in terms of viability and considers Policy 8 Part A to be unsound. The policy should be amended to encourage to reflect the identified mix rather than require it. Affordable housing 7.9. H. Burtwistle & Son is supportive of the need for affordable housing. The Framework is however clear that affordable housing policies must not only take account of need but also viability. 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The 2016 Viability report previously concluded that sites located within high value areas are comfortably viable with the Councils proposed affordable housing provision of 25%, together with draft S106 policies. However for sites within medium to low value areas it was noted that the viability pressure was greater, and a reduced requirement should be adopted. 7.13. The 2019 Whole Plan Viability Study assesses the impact of the Plan requirements. Appendices 3 to 10 of the 2019 Whole Plan Viability Study demonstrate viability issues for a number of site typologies, including all typologies in low value areas. Typologies in low value areas were unviable when tested against the base assumptions. The study concluded that in high and medium value areas site typologies were comfortably viable. 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Burtwistle & Son is concerned that with all the policy requirements the Local Plan details this could undermine the provision of affordable housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is appropriately
tested to ensure the sites identified and allocated are deliverable. 7.16. 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. 

Adaptable and Accessible Homes 7.17. Part D of the policy states that new development should aim to include the provision of homes which are adaptable, accessible and suitable for people with a wide range of needs. H. Burtwistle & Son supports the adaptation of the existing stock and encouraging the provision of adaptable, accessible homes. However, H. Burtwistle & Son object and does not consider it appropriate to require all developments to include this provision. Custom and Self Build Homes 7.18. H. Burtwistle & Son understands the need and supports the delivery of Self-Build and Custom Build housing. H. Burtwistle & Son understands the idea of increasing the self-build and custom build sector for its potential contribution to the overall housing supply. 7.19. H. Burtwistle & Son consider that further evidence should be provided in respect of the level of demand in Doncaster for self and custom build and the nature of demand, including, whether those wanting to self-build would actually consider building within a larger housing development. As it stands paragraph 6.3 of the Plan provides very little explanation or evidence to support the policy. 7.20. H. Burtwistle & Son consider that the requirements in Policy 8 are not justified and do not provide an appropriate strategy. H. Burtwistle & Son consider that Policy 8 along with other policy requirements within the Plan could threaten the deliverability of the Plan. The Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 7.21. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 7.22. However, H. Burtwistle & Son consider that with increased flexibility in Part A, revised affordable housing targets, and increased flexibility in the approach on custom and self build alongside robust evidence supporting the requirements the Local Plan can be found sound. H. Burtwistle & Son will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 7.23. To overcome the objection and address soundness matters, the Council should: - Policy 8 Part A should be amended to so that developers are encouraged to reflect the identified mix on schemes rather than require it". - Review the approach to affordable housing to ensure it reflects the new Framework (2019) and that the evidence base and viability approach is robust and credible. - Include a flexible approach on accessible and adaptable homes and ensure the evidence base is robust and credible. - Include a flexible approach on custom build and self-build homes and ensure the evidence base is robust and credible.

Summary:

Concerned with a number of approaches and criteria established within Policy 8. Housing Mix There is a lack of evidence base for this policy approach which is not based on an up to date Strategic Housing Market Assessment with the Housing Needs Survey being dated 2015 with an update in 2016. Policy 8 seeks to specifically address the housing mix on sites. This aspect of the policy is onerous and prescriptive, particularly as it is seeking to control the size of units, mix and tenure. The policy should be amended to encourage or reflect, rather than require. It is unclear from the Whole Plan Viability Study how the identified mix has been taken into account. An average size of dwelling of 92.90 has been assumed for the purposes of the testing. This appears to be based on a general assumption of 30% 2 bed dwellings 40% 3 bed dwellings, and 30% 4 bed dwellings. This does not align with the mix sought through the Local Plan, detailed in appendix 4 and derived from the housing needs study 2019. Recommend a flexible approach is taken regarding housing mix, which recognises that the need and demand will vary from area to area and site to site, to ensure that the scheme is viable, and provides an appropriate mix for the location. Considers a mix is required by policy 8 but has not been appropriately tested in terms of viability and considers Policy 8 Part A to be unsound. Affordable housing Supportive of the need for affordable housing. But affordable housing policies must not only take account of need but also viability. The 2016 Viability report previously concluded that sites located within high value areas are comfortably viable with the Councils proposed affordable housing provision of 25%, together with draft s106 policies. The 2019 Whole Plan Viability Study assesses the impact of the Plan requirements. Typologies in low value areas were unviable when tested against the base assumptions. The study concluded that in high and medium value areas site typologies were comfortably viable. However, there are some circumstances were there were viability pressures in medium value areas, significantly the additional policy costs and sensitivities were tested against the study’s base assumptions which notably included 15% affordable housing and not 23% sought by Policy 8. Concerned that there is little evidence to support an affordable housing target of 15% in low value areas. H Burtwistle & Son consider that further viability evidence is required to support the target of 23% in combination with the policy requirements of the plan, including, mix, housing design standards, and density. Further there is limited justification in the Plan or associated evidence for a target of 23% affordable housing. The explanatory text states that the current need for affordable housing represents 23% of the Local Plan requirement for housing. Paragraph 6.9 states that this does not take into account current completions or viability. Concerned that with all the policy requirements the Local Plan details this could undermine the provision of affordable housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is appropriately tested to ensure the sites identified and allocated are deliverable. Adaptable and Accessible Homes Part D of the policy states that new development should aim to include the provision of homes which are adaptable, accessible and suitable for people with a wide range of needs. Does not consider it appropriate to require all developments to include this provision. Custom and Self Build Homes Further evidence should be provided in respect of the level of demand in Doncaster for self and custom build and the nature of demand, including, whether those wanting to self-build would actually consider building within a larger housing development. As it stands paragraph 6.3 of the Plan provides very little explanation or evidence to support the policy. The requirements in Policy 8 are not justified and do not provide an appropriate strategy. Policy 8, along with other policy requirements within the Plan could threaten the deliverability of the Plan. To overcome the objection and address soundness matters, the Council should: - Policy 8 Part A should be amended to so that developers are encouraged to reflect the identified mix on schemes rather than require it". - Review the approach to affordable housing to ensure it reflects the new Framework (2019) and that the evidence base and viability approach is robust and credible. - Include a flexible approach on accessible and adaptable homes and ensure the evidence base is robust and credible. - Include a flexible approach on custom build and self-build homes and ensure the evidence base is robust and credible.
The viability testing considers a number of different viability scenarios. This includes the 'base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost' developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in. NPPF is clear in the support for custom and self-build housing and the Council maintains a Register of any such interest and the policy seeks to 'encourage' such opportunities and is not mandatory.

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| Comment Ref: C/Policy 8/04013/1/007 |
| Attend Examination: Written Representation |

| Reason: |
| Area: Chapter 6: Meeting the Need for New Homes |
| Policy: Policy 8: Delivering the Necessary Range of Housing |

**Tests of Soundness:**

**Comment:**
The JRP welcomes the explanation of meeting future housing needs by taking account of the demography of Doncaster, most especially as it predicts a reduction in younger people and a 30% increase in the over 60's demographic. Clearly, regular monitoring will be required in order to satisfy the needs and demands of the population. Although DMBC has engaged with service providers, the JRP believe there is insufficient evidence stated within the Plan to ensure there is provision of services for residents of new housing developments: specifically, the availability of school places, GPs and dentistry for the expected and projected increase in population.

**Summary:**
The JRP welcomes the explanation of meeting future housing needs by taking account of the demography of Doncaster, most especially as it predicts a reduction in younger people and a 30% increase in the over 60's demographic. Clearly, regular monitoring will be required in order to satisfy the needs and demands of the population. Although DMBC has engaged with service providers, the JRP believe there is insufficient evidence stated within the Plan to ensure there is provision of services for residents of new housing developments: specifically, the availability of school places, GPs and dentistry for the expected and projected increase in population.

**Response:**
Such matters are identified through the infrastructure planning evidence base and there are numerous policies in the plan itself to ensure developments contribute towards infrastructure that is impacted on by their development e.g. Policy 8, Policy 29, Policy 66
We represent Rentplus UK Ltd, an innovative company providing affordable rent to buy housing for hard-working people aspiring to home ownership. Rentplus provides an accessible route to achieve their dream through the rent - buy - own model, renting at an affordable rent and a gifted 10% deposit upon purchase. Rentplus have been recognised by the National Housing Awards as the most innovative Home Ownership Scheme for 2019. These representations, set out an overview of the Rentplus model of affordable rent to buy, the aim of which is to help those hard-working families unable to access ownership either through shared ownership, starter homes or homes on the open market to overcome the mortgage 'gap'. This is achieved through a defined period of affordable rent, during which all Rentplus residents are able to save. It should be noted as a background to these representations that the National Planning Policy Framework incorporates a wider definition of affordable housing, now providing four categories; rent to buy is included within category d) Other affordable routes to home ownership. Each scheme delivered by Rentplus offers a unique, affordable route to home ownership through affordable rented housing, set at the lower of 80% market rate (affordable rent) or LHA, including any service charge, with a planned route to ownership at years 5, 10, 15 or 20 after first occupation. The most important difference to other affordable tenures is that families are able to save for a mortgage deposit while renting the same home at an affordable - intermediate rent, with a 10% gifted deposit to assist with the purchase. The new Housing Minister, Esther McVey highlighted the importance of Rent to Buy in her first speech to the RESI Convention (12th September 2019) (note 1 - The speech is accessible via https://www.gov.uk/government/speeches/resi-convention-2019). In talking about the Government's drive to increase home ownership she stated that it includes "Rent to Buy, so people can rent knowing that they are going to buy, knowing that they've got a bit of breathing space, maybe it’s in 5 years, maybe it’s in 10 years, but they will get to own that property - so they can plan, knowing they have the certainty of getting a deposit and getting that house." These supportive comments concisely summarise the Rentplus model described above which currently provides a home for 650 households across the UK. Her comments not only reinforce the NPPF provision for additional affordable housing routes to home ownership, but also endorses directly the work of Rentplus. Prior to Esther McVey becoming Housing Minister, Kit Malthouse (Housing Minister at the time) referred to the importance of Rent to Buy housing in a letter dated June 2019 (attached). This letter confirmed the Government's commitment to "increasing access to home ownership?We recognise that Rent to Buy can help people to achieve this." He continued, "'In the revised NPPF, we expanded the definition of affordable housing to include a greater range of affordable routes to home ownership, including Rent to Buy. There are no specific or implicit barriers in existing planning policy or guidance that would prevent local councils from accepting Rentplus properties as affordable housing. This is demonstrated by Rentplus having reached agreement on the properties it has secured to date." (SEE EMAIL FOR LETTER) A further recent development - The Affordable Housing Commission, chaired by one of the pre-eminent voices on affordable housing, Lord Best, published its interim report Defining and Measuring housing affordability - an alternative approach in June 2019 (note 2 - The report is accessible via www.affordablehousingcommission.org ). This was produced in response to the difficulties that the standard measure of affordability, comparing house prices to incomes, poses in recognising housing stress and affordability across the housing spectrum. The report proposes recalibrating the approach of measuring affordability by reference to rents or purchase costs exceeding one third of household income (for those in work) in order to better pose a pro-active and interventionist response to housing difficulties. This follows recent work which suggests that the probability of housing stress increases with housing costs exceeding a quarter of gross income on rent. The Commission also highlights the findings of numerous surveys which state that the majority of tenants and adults living with parents aspire to own their own home; of the 5.5m 'frustrated first time buyers', 1.6m are in the private rented sector. This group is one of four the report identifies as having particular needs and housing stresses, and who can't buy "mainly because of the time needed to save for large deposits". These numbers represent an increase of 0.6 million renters since 2010, many of whom are paying over 40% of household income on rent. The report recognises the well-known problem that many households in the private rented sector are likely to have multiple affordability issues, exacerbated by insecurity of tenure and poor-quality living standards. The report states that "good quality homes of the right size for the household is seen as a basic minimum"; while this is a generally accepted principle in the delivery of housing, and in particular of affordable housing across England, this can be difficult to achieve through the planning system which does not adequately reflect the variations in household needs. The decrease in the numbers of households able to access home ownership is in large part due to the time taken to save for a mortgage deposit without the help of the 'Bank of Mum and Dad'. The Affordable Housing Commission notes that "those just able to buy are likely to have to save for an unrealistic period or unlikely ever to be able to raise an adequate deposit" - for the purposes of assessing the numbers of would-be purchasers, the Commission 'cuts off' the savings period at 'just' five years. The difficulty in saving for a deposit is one of the most critical barriers to home ownership, and the focal point for Rentplus - providing a clear route and time period for working households, including those with children, to save. Using the Commission's proposed measure of affordability would better capture the needs of struggling first-time buyers, many of whom are otherwise likely to remain trapped in insecure private rented sector accommodation.

Summary:

Representation from Tetlow King Planning on behalf of Rentplus UK Ltd, an innovative company providing affordable rent to buy housing for hard-working people aspiring to home ownership. Sets out context to the Rentplus model which is to provide an accessible route to home ownership.
Response:

There is reference within point B of this policy to the NPPF definition of affordable housing, the revised definition includes “other routes to affordable home ownership such as Rent to Buy” however this tenure is not included within the policy or supporting text. There should be explicit reference to Rent to Buy and other routes to affordable home ownership within the tenure mix for affordable housing that is proposed in the plan. We would also like to see the Council update their SHMA to recognise the wider range of tenures of affordable housing and also to include “other routes to affordable home ownership” within Policy 8, with specific reference to Rent to Buy as a tenure within the tenure mix proposed for Doncaster. The Rent to Buy model allows the opportunity for the Council and RPs to diversify the local housing offer without further recourse to public subsidy. The affordable rented period provides local families with security of tenure, with certainty of management and maintenance by a local partner RP, and critically the opportunity to save towards purchase. As affordable rent to buy meets needs for affordable rent (the only difference being marked by the expectation by all parties of purchase), it comes with a significant benefit of freeing up existing affordable rented homes for others in priority need, as demonstrated by Rentplus schemes across England. Rentplus undertakes rigorous affordability testing of potential purchasers to ensure that this is a realistic expectation and can be achieved within the set timeframes of five to 20 years. This means that substantial discounts at the point of purchase are not required, as it is the inability to save for a mortgage deposit or other financial issues that prevents a significant number of households from accessing ownership, and not the ability to service a mortgage over the long term. Working with local authorities to meet local priorities is critical to the success of the Rentplus model of affordable rent to buy, as helping hard-working local families access ownership reduces the pressure on the housing waiting list, freeing up local authority and housing association time to focus on meeting priority needs for social and affordable rented homes. Rentplus can assist in meeting local need, allocating all of its residents through the Housing Allocation Scheme; by enabling real savings to be built while renting at an affordable rent the Council can help meet the needs of low and middle income households, providing greater choice and flexibility in the planning system. The Council’s work to understand the potential delivery of affordable housing is supported. Should officers wish to discuss how best to facilitate the Rentplus model, please do get in touch.

Summary:

There should be explicit reference to Rent to Buy and other routes to affordable home ownership within the tenure mix for affordable housing that is proposed in the plan. We would also like to see the Council update their SHMA to recognise the wider range of tenures of affordable housing and also to include "other routes to affordable home ownership" within Policy 8, with specific reference to Rent to Buy as a tenure within the tenure mix proposed for Doncaster.

Response:

It is not the intention to repeat national policy in the local plan. NPPF sets out the detailed definitions of affordable housing as the Representation points out. It is also noted that these definitions were significantly changed as part of the revisions to NPPF meaning inclusion in the local plan could date if such definitions are changed again by government. The latest definitions have been considered through the 2019 Housing Needs Study.
A. Housing Mix  2.70 In relation to Housing Mix, it is important that a mix expectation is not too prescriptive and that flexibility within the policy is applied to ensure that a mix policy is workable. Consideration needs to be given to the fact that need and demand will vary within the Borough and over time. Additional wording which references flexibility should be included within Part A of Policy 8. B & C Affordable Housing  2.71 Whilst the requirement for affordable housing is not in dispute it is questionable whether the affordable need will be met, when large parts of the Doncaster Main Urban Area which sees the focus of the majority of proposed development lie in the lower affordable housing requirement value area, with a proposed requirement of 15%. Even then, not all schemes tested in the Whole Plan Viability Testing Report (2019) had a viable outcome at the reduced 15% rate and some schemes required a reduction on other S106 policy contributions (Whole Plan Viability Assessment paragraph 7.5). It is recognised in the SA that "appropriate trade-offs will need to be made between affordable housing and the other infrastructure requirements to secure the delivery of new housing, based on local priorities, especially within areas of low market demand. Getting this right balance is critical in ensuring viable development."  2.72 It is considered that the Council are unlikely to meet their identified need of 209 affordable units per annum, which equates to 23% of the requirement, when the focus of development in the Local plan directs development to the lower requirement areas with a 15% requirement. In order to ensure the need for affordable homes is met, either the overall housing target should be increased (as the Framework allows) or more sites should be allocated in the higher affordable housing requirement value areas, where viability is not an issue. As drafted, the policy is unsound as it will not be effective in meeting affordable housing need. D. Adaptable and accessible dwellings.  2.73 There appears to be duplication with this part of Policy 8 and Policy 46 in relation to adaptable and accessible dwellings. Furthermore, it is not clear within the policy wording or justifying text what the expectation is in relation to increasing the provision of housing types suitable for elderly people.

Summary:
Housing mix should not be too prescriptive and allow flexibility to ensure the mix policy is workable. Needs vary across the borough and over time, this should be considered. Additional flexibility wording should be in Part A of Policy 8. B & C affordable housing: Whilst there requirement is not in dispute, it is questionable whether it will be met when large parts of the urban area lie in the lower affordable housing requirement value area, with a proposed 15% requirement. Even then, not all are viable and require a reduction in other s106 contributions. The SA recognises that appropriate trade-offs will be needed. It is considered unlikely that the council will meet the identified need of 209 affordable dpa, or 23% of the requirement, when the focus of development is in areas with a 15% requirement. To ensure affordable delivery, either the housing target should be increased or more sites should be allocated in higher value areas. The policy as drafted is unsound and won’t be effective in meeting affordable housing need. D. Adaptable and accessible dwellings: There is a duplication in Policy 8 & 46 in relation to adaptable and accessible dwellings. It is not clear within the policy wording or justifying text what the expectation is in relation to increasing the provision of housing types suitable for elderly people.

Response:
It is not considered that the policy is overly prescriptive in respect to housing mix and the policy text refers to the need for such to be informed by latest evidence which in itself acknowledges that this may change during the lifetime of the plan. Even under the previous NPPF’s requirement to consider an uplift to a housing requirement to reflect market signals this never amounted to more than around 10% at most. The standard methodology already makes allowances for affordability ratios and the Local Plan has already almost doubled this figure with the 920dpa requirement so will be delivering more affordable housing which will increase supply/competition and help to bring down affordability even further. Doncaster Council has ambitious plans to deliver more affordable homes, including more council housing, as part of a wider delivery programme. During 2019/20, the first developments will include a range of general needs and more bespoke accommodation. Sites will be funded through a combination of Housing Capital Programme funds; the use of One-for-One capital receipts from Right to Buy sales; and grant funding allocated from the Homes England Shared Ownership and Affordable Housing Programme (SOAHP) 2016/21 should the future bid be successful. Other initiatives and strategies, such as the Council’s Inclusive Growth Plan, are seeking to address issues such as skills and productivity/increasing wages etc which will also assist people in being able to afford/access housing. Part C is not considered to duplicate Policy 46 it merely signposts to the policy where such detail can be found and is considered to be helpful given the importance of planning for housing to meet specific needs.
2.25 Policy 8 sets out a number of aims and aspirations that the Council have in respect of housing developments. Our Client is one of the largest housebuilders in the country and is well placed to comment on the suitability and practicality of the policy. 2.26 Part b) of the policy provides guidance on the level of affordable housing that will be required, with developments of 15 homes or more having to provide 23% affordable housing in the Borough’s high value housing market areas or a lower requirement of 15% elsewhere in the Borough. The higher/lower value areas should be defined using a map within the policy for clarity. 2.27 The figure of 23% affordable housing in the Borough’s high value housing market areas creates issues when calculating the requirement; we propose the figure is rounded down to 20% to simplify calculations and ensure that sites are viable. 2.28 Part d) of the policy relates to provision of housing for older people. As per our previous representations, our Client seeks clarification as to whether the Council are seeking to impose this policy on all residential developments or if it is merely aspirational. 2.29 The policy states that new developments should include the provision of homes which are adaptable, accessible, and suitable for people with a wide range of needs in line with Policy 46. Part d) states that it must be demonstrated how ‘the provision of housing types suitable for older people? especially bungalows, extra care facilities and supported living accommodation’ can be increased. Policy 46 sets out the minimum space standards, building regulations requirements and states that at least 65% of all new homes on housing developments of over 0.5 hectare or 10 or more units should meet these regulations. 2.30 Policy 46 goes on to state that ‘in all cases, the above standards should be met’ and that ‘exemptions to these requirements will only be considered where the applicant can robustly demonstrate, with appropriate evidence, that adhering to the standards is not feasible due to physical constraints, or it is demonstrated that it is not viable to do so’. 2.31 The provision of bungalows, extra care facilities and supported living accommodation will significantly impact upon the viability of developments and in turn may impact upon the deliverability of sites. Our Client objects to this policy and recommends that that percentage of new homes required to meet these standards is significantly reduced. 2.32 Part f) of the policy seeks to encourage custom build and self-build homes on housing allocations. As per our previous representations our Client objects to this element of the policy as they have genuine concerns as the provision of such units on major housing schemes would simply not work in practice. Large developments can have anywhere between 1 to 3 developers on site and the potential involvement of an additional private individuals could have repercussions on a number of issues such as the timing of delivery, cashflow and equalisation, as well as potential legal agreements. In addition, the way in which Section 106 contributions and CIL are calculated would be complicated and it is unclear who’s responsibility this would be in terms of making the relevant payments. Self-build plots are usually on small plots of land that do not require any, or very limited, contributions and it is unclear if they would have to contribute to the obligations associated with the wider site. There is also likely to be uncertainty around conditions and who would be responsible for discharging them. For example, if a developer obtained outline planning permission for the whole site, would they be responsible for discharging conditions specific to the self-build plot? 2.33 In addition to the above, we would question what evidence the Council have to demonstrate that there is a demand for self-build plots within major housing developments. Without any evidence to underpin this requirement, it is our Clients opinion that the policy is unsound as it is not justified or effective and therefore fails to meet the tests of soundness at paragraph 35 of the Revised Framework.

Summary:
Policy 8 - Delivering the necessary range of housing. Part B. 1. Affordable housing high/lower value areas should be shown on a map in the policy. 2. The 23% figure should be lowered to 20% to make calculation easier and to improve viability. Part (d) 1. Will this be imposed on all residential development or is it purely aspirational? 2. The provision of bungalows, extra care facilities and supported living accommodation will significantly impact upon the viability of developments. May impact upon the deliverability of sites. Objects to this policy and recommends that that percentage of new homes required to meet these standards is significantly reduced. Part (f) Self build 1. Object to this element of the policy. 2. Such units on major housing schemes will not work in practice. 3. Involvement of private individuals would be problematic - timing of delivery, cash flow, equalization and legal agreements. 4. Would complicate Section 106 agreements. 5. Would cause problems with conditions/discharge of conditions. 6. Without clear evidence of demand this policy is not sound.

Response:
Appendix 5 sets out the map for the purposes of Policy 8 and the higher/lower value areas. It is not clear why a 23% requirement creates issues when calculating the affordable housing requirement and needs to be simplified; any percentage figure may result in uneven numbers of houses as the total number of dwellings proposed will be the main variable so setting the requirement to 20% would still lead to such results. The policy should be read alongside policy 46: Housing Standards and NPPF and PPG is clear that local plans must look to address meeting housing needs of different groups and has been considered through the viability testing. Likewise, NPPF is clear of the need to support and actively bring forward custom and self-build plots.
Comment:

2.25 Policy 8 sets out a number of aims and aspirations that the Council have in respect of housing developments. Our Client is one of the largest housebuilders in the country and is well placed to comment on the suitability and practicality of the policy. 2.26 Part b) of the policy provides guidance on the level of affordable housing that will be required, with developments of 15 homes or more having to provide 23% affordable housing in the Borough’s high value housing market areas or a lower requirement of 15% elsewhere in the Borough. The higher/lower value areas should be defined using a map within the policy for clarity. 2.27 The figure of 23% affordable housing in the Borough’s high value housing market areas creates issues when calculating the requirement; we propose the figure is rounded down to 20% to simplify calculations and ensure that sites are viable. 2.28 Part d) of the policy relates to provision of housing for older people. As per our previous representations, our Client seeks clarification as to whether the Council are seeking to impose this policy on all residential developments or if it is merely aspirational. 2.29 The policy states that new developments should include the provision of homes which are adaptable, accessible, and suitable for people with a wide range of needs in line with Policy 46. Part d) states that it must be demonstrated how ‘the provision of housing types suitable for older people? especially bungalows, extra care facilities and supported living accommodation’ can be increased. Policy 46 sets out the minimum space standards, building regulations requirements and states that at least 65% of all new homes on housing developments of over 0.5 hectare or 10 or more units should meet these regulations. 2.30 Policy 46 goes on to state that ‘in all cases, the above standards should be met’ and that ‘exemptions to these requirements will only be considered where the applicant can robustly demonstrate, with appropriate evidence, that adhering to the standards is not feasible due to physical constraints, or it is demonstrated that it is not viable to do so’. 2.31 The provision of bungalows, extra care facilities and supported living accommodation will significantly impact upon the viability of developments and in turn may impact upon the deliverability of sites. Our Client objects to this policy and recommends that that percentage of new homes required to meet these standards is significantly reduced. 2.32 Part f) of the policy seeks to encourage custom build and self-build homes on housing allocations. As per our previous representations our Client objects to this element of the policy as they have genuine concerns as the provision of such units on major housing schemes would simply not work in practice. Large developments can have anywhere between 1 to 3 developers on site and the potential involvement of an additional private individuals could have repercussions on a number of issues such as the timing of delivery, cashflow and equalisation, as well as potential legal agreements. In addition, the way in which Section 106 contributions and CIL are calculated would be complicated and it is unclear who’s responsibility this would be in terms of making the relevant payments. Self-build plots are usually on small plots of land that do not require any, or very limited, contributions and it is unclear if they would have to contribute to the obligations associated with the wider site. There is also likely to be uncertainty around conditions and who would be responsible for discharging them. For example, if a developer obtained outline planning permission for the whole site, would they be responsible for discharging conditions specific to the self-build plot? 2.33 In addition to the above, we would question what evidence the Council have to demonstrate that there is a demand for self-build plots within major housing developments. Without any evidence to underpin this requirement, it is our Clients opinion that the policy is unsound as it is not justified or effective and therefore fails to meet the tests of soundness at paragraph 35 of the Revised Framework.

Summary:

Policy 8 - Delivering the necessary range of housing. Part B. 1. Affordable housing high/lower value areas should be shown on a map in the Policy. 2. The 23% figure should be lowered to 20% to make calculation easier and to improve viability. Part (d) 1. Will this be imposed on all residential development or is it purely aspirational? 2. The provision of bungalows, extra care facilities and supported living accommodation will significantly impact upon the viability of developments. May impact upon the deliverability of sites. Objects to this policy and recommends that that percentage of new homes required to meet these standards is significantly reduced. Part (f) Self build 1. Object to this element of the policy. 2. Such units on major housing schemes will not work in practice. 3. Involvement of private individuals would be problematic - timing of delivery, cash flow, equalisation and legal agreements. 4. Would complicate S106 agreements. 5. Would cause problems with conditions/discharge of conditions. 6. Without clear evidence of demand this policy is not sound.

Response:

Appendix 5 sets out the map for the purposes of Policy 8 and the higher/lower value areas. It is not clear why a 23% requirement creates issues when calculating the affordable housing requirement and needs to be simplified; any percentage figure may result in uneven numbers of houses as the total number of dwellings proposed will be the main variable so setting the requirement to 20% would still lead to such results. The policy should be read alongside policy 46: Housing Standards and NPPF and PPG is clear that local plans must look to address meeting housing needs of different groups and has been considered through the viability testing. Likewise, NPPF is clear of the need to support and actively bring forward custom and self-build plots.
A. Housing Mix 2.30 In relation to Housing Mix, it is important that a mix expectation is not too prescriptive and that flexibility within the policy is applied to ensure that a mix policy is workable. Consideration needs to be given to the fact that need and demand will vary within the Borough and over time. Additional wording which references flexibility should be included within Part A of Policy 8. B and C. Affordable Housing 2.31 Whilst the requirement for affordable housing is not in dispute it is questionable whether the affordable need will be met, when large parts of the Doncaster Main Urban Area which sees the focus of the majority of proposed development lies in the lower affordable housing requirement value area, with a proposed requirement of 15%. Even then, not all schemes tested in the Whole Plan Viability Testing Report (2019) had a viable outcome at the reduced 15% rate and some schemes required a reduction on other s106 policy contributions (Whole Plan Viability Assessment paragraph 7.5). It is recognised in the SA that "appropriate trade-offs will need to be made between affordable housing and the other infrastructure requirements to secure the delivery of new housing, based on local priorities, especially within areas of low market demand. Getting this right balance is critical in ensuring viable development." 2.32 It is considered that the Council are unlikely to meet their identified need of 209 affordable units per annum, which equates to 23% of the requirement, when the focus of development in the Local plan directs development to the lower requirement areas with a 15% requirement. In order to ensure the need for affordable homes is met, either the overall housing target should be increased (as the Framework allows) or more sites should be allocated in the higher affordable housing requirement value areas, where viability is not an issue. As drafted, the policy is unsound as it will not be effective in meeting affordable housing need. D. Adaptable and accessible dwellings. 2.33 There appears to be duplication with this part of Policy 8 and Policy 46 in relation to adaptable and accessible dwellings. Furthermore it is not clear within the policy wording or justifying text what the expectation is in relation to increasing the provision of housing types suitable for elderly people.

Summary:
Housing mix should not be too prescriptive and allow flexibility to ensure the mix policy is workable. Needs vary across the borough and over time, this should be considered. Additional flexibility wording should be in Part A of Policy 8. B and C affordable housing: Whilst the requirement is not in dispute, it is questionable whether it will be met when large parts of the urban area lie in the lower affordable housing requirement value area, with a proposed 15% requirement. Even then, not all are viable and require a reduction in other s106 contributions. The SA recognises that appropriate trade-offs will be needed. It is considered unlikely that the council will meet the identified need of 209 affordable dpa, or 23% of the requirement, when the focus of development is in areas with a 15% requirement. To ensure affordable delivery, either the housing target should be increased or more sites should be allocated in higher value areas. The policy as drafted is unsound and won't be effective in meeting affordable housing need. D. Adaptable and accessible dwellings: There is a duplication in Policy 8 & 46 in relation to adaptable and accessible dwellings. It is not clear within the policy wording or justifying text what the expectation is in relation to increasing the provision of housing types suitable for elderly people.

Response:
It is not considered that the policy is overly prescriptive in respect to housing mix and the policy text refers to the need for such to be informed by latest evidence which in itself acknowledges that this may change during the lifetime of the plan. Even under the previous NPPF's requirement to consider an uplift to a housing requirement to reflect market signals this never amounted to more than around 10% at most. The standard methodology already makes allowances for affordability ratios and the Local Plan has already almost doubled this figure with the 920dpa requirement so will be delivering more affordable housing which will increase supply/competition and help to bring down affordability even further. Doncaster Council has ambitious plans to deliver more affordable homes, including more council housing, as part of a wider delivery programme. During 2019/20, the first developments will include a range of general needs and more bespoke accommodation. Sites will be funded through a combination of Housing Capital Programme funds; the use of One-for-One capital receipts from Right to Buy sales; and grant funding allocated from the Homes England Shared Ownership and Affordable Housing Programme (SOAHP) 2016/21 should the future bid be successful. Other initiatives and strategies, such as the Council's Inclusive Growth Plan, are seeking to address issues such as skills and productivity/increasing wages etc which will also assist people in being able to afford/access housing. Part C is not considered to duplicate Policy 46 it merely signposts to the policy where such detail can be found and is considered to be helpful given the importance of planning for housing to meet specific needs.
Policy 8 seeks to ensure the right range, type, size and tenure of homes are delivered within Doncaster. Framecourt Homes is concerned with some aspects of this policy, and the robustness of the whole plan viability. Framecourt Homes therefore consider that the Policy 8 is unsound. Test of Soundness 7.2. Framecourt Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 7.3. Framecourt Homes is concerned with a number of approaches and criteria established within Policy 8. Housing Mix 7.4. Framecourt Homes is supportive of the principle of providing a broad mix of housing. However the Local Plan should not dictate housing mix across the borough. The local Plan should achieve this housing mix through identifying the level of provision and the broad distribution of new housing. 7.5. Importantly there does not appear to be an up to date Strategic Housing Market Assessment with the Housing Needs Survey being dated 2015 with an update in 2016. The Economic Forecasts and Housing Needs Assessment does not consider housing mix. The Housing needs survey summary 2019 (ARC4) only appears to deal with the total affordable need and size of affordable dwellings, in terms of number of bedrooms. Therefore there is a lack of evidence base for this policy approach. It is acknowledged that Appendix 4 summarises the findings of the housing need survey 2019, however the full study is not publically available yet. Framecourt Homes reserve the right to comment further when this becomes available.  7.6. Although SHMA and Appendix 4 of the Plan, derived from the Housing Need Study 2019, considers the broad issues of housing mix, the Local Plan should not seek to control the housing mix, since it would mean that the market would be unable to adjust to changes in the market. Policy 8 seeks to specifically address the housing mix on sites. This aspect of the policy is onerous and prescriptive, particularly as it is seeking to control the size of units, mix and tenure. The policy should be amended to encourage or reflect, rather than require. 7.7. It is unclear from the Whole Plan Viability Study how the identified mix has been taken into account. An average size of dwelling of 92.90 has been assumed for the purposes of the testing. This appears to be based on a general assumption of 30% 2 bedroom dwellings 40 % 3 bed dwellings, and 30 % 4 bed dwellings. This does not align with the mix sought through the Local Plan, detailed in appendix 4 and derived from the housing needs study 2019. 7.8. Framecourt Homes recommend that a flexible approach is taken regarding housing mix, which recognises that the need and demand will vary from area to area and site to site, to ensure that the scheme is viable, and provides an appropriate mix for the location. There is a real need to create a housing market in Doncaster that will attract investors to Doncaster and provide an element of aspiration to ensure working people and families are retained within the area. The evidence presented in the plan is time limited, and only identifies current deficits. Framecourt Homes has been unable to review the full findings of the Housing Needs Study 2019, and reserves the right for further comment in this regard. However, Framecourt Homes considers that the mix required by policy 8 has not been appropriately tested in terms of viability and considers Policy 8 Part A to be unsound. The policy should be amended to encourage to reflect the identified mix rather than require it. Affordable housing 7.9. Framecourt homes is supportive of the need for affordable housing. The Framework is however clear that affordable housing policies must not only take account of need but also viability. Paragraph 34 of the Framework (2019) established the importance of viability to ensure that development identified in the Plan should not be subject to such a scale of obligations and policy burden that their ability to be delivered might be threatened. 7.10. The updated viability (2019), builds upon the earlier assessment and updates it in line with the emerging policies and the revised Framework. The assessment continues to identify three market value areas (low, medium and high) within Doncaster. 7.11. Tables 3-14 of the 2016 Viability Report show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support any level of affordable housing, whilst a number of schemes in the medium value areas would also struggle to provide the 15 percent required by this policy. 7.12. The 2016 Viability report previously concluded that sites located within high value areas are comfortably viable with the Councils proposed affordable housing provision of 25%, together with draft S106 policies. However for sites within medium to low value areas it was noted that the viability pressure was greater, and a reduced requirement should be adopted. 7.13. The 2019 Whole Plan Viability Study assesses the impact of the Plan requirements. Appendices 3 to 10 of the 2019 Whole Plan Viability Study demonstrate viability issues for a number of site typologies, including all typologies in low value areas. Typologies in low value areas were unviable when tested against the base assumptions. The study concluded that in high and medium value areas site typologies were comfortably viable. However, there are some circumstances were there were viability pressures in medium value areas, significantly the additional policy costs and sensitivities were tested against the study’s base assumptions which notably included 15% affordable housing and not 23% sought by Policy 8. 7.14. Framecourt Homes are concerned that there is little evidence to support an affordable housing target of 15% in low value areas. Framecourt Homes consider that further viability evidence is required to support the target of 23% in combination with the policy requirements of the plan, including, mix, housing design standards, and density. Further there is limited justification in the Plan or associated evidence for a target of 23% affordable housing. The explanatory text states that the current need for affordable housing represents 23% of the Local Plan requirement for housing. Paragraph 6.9 states that this does not take into account current completions or viability. 7.15. Framecourt Homes is concerned that with all the policy requirements the Local Plan details this could undermine the provision of affordable housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is appropriately
tested to ensure the sites identified and allocated are deliverable. 7.16. 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. Adaptable and Accessible Homes 7.17. Part D of the policy states that new development should aim to include the provision of homes which are adaptable, accessible and suitable for people with a wide range of needs. Framecourt Homes supports the adaptation of the existing stock and encouraging the provision of adaptable, accessible homes. However, as explained in response to Policy 46 Framecourt Homes object and does not consider it appropriate to require all developments to include this provision. Custom and Self Build Homes 7.18. Framecourt Homes understands the need and supports the delivery of Self-Build and Custom Build housing. Framecourt Homes understands the idea of increasing the self-build and custom build sector for its potential contribution to the overall housing supply. 7.19. Framecourt Homes consider that further evidence should be provided in respect of the level of demand in Doncaster for self and custom build and the nature of demand, including, whether those wanting to self-build would actually consider building within a larger housing development. As it stands paragraph 6.3 of the Plan provides very little explanation or evidence to support the policy. 7.20. Framecourt Homes consider that the requirements in Policy 8 are not justified and do not provide an appropriate strategy. Framecourt Homes consider that Policy 8 along with other policy requirements within the Plan could threaten the deliverability of the Plan. The Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 7.21. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 7.22. However, Framecourt Homes consider that with increased flexibility in Part A, revised affordable housing targets, and increased flexibility in the approach on custom and self build alongside robust evidence supporting the requirements the Local Plan can be found sound. Framecourt Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 7.23. To overcome the objection and address soundness matters, the Council should: - Policy 8 Part A should be amended to so that developers are encouraged to reflect the identified mix on schemes rather than require it". - Review the approach to affordable housing to ensure it reflects the new Framework (2019) and that the evidence base and viability approach is robust and credible. - Include a flexible approach on accessible and adaptable homes and ensure the evidence base is robust and credible. - Include a flexible approach on custom build and self-build homes and ensure the evidence base is robust and credible.

Summary:

Consider Policy 8 to be unsound. Concerned with a number of approaches and criteria established within Policy 8. Support the principle of providing a broad mix of housing. However it should not dictate housing mix across the borough. The Local Plan should achieve the mix by identifying the level of provision and the broad distribution of new housing. There is no up to date Strategic Housing Market Assessment and the PBA work does not include housing mix. The Arc 4 work only appears to deal with affordable need and size of affordable dwellings in terms of bedrooms. There is a lack of evidence to support the approach. The Arc 4 work is not publicly available and Framecourt reserve the right to comment when it is available. The SHMA and Appendix 4 of the plan consider local housing mix, but the Local Plan should not seek to control the housing mix, since it would mean the market cannot adjust to market changes. The housing mix in Policy 8 is overly onerous and prescriptive particularly as it is seeking to control size, mix and tenure. It should encourage or reflect, rather than require. It is unclear in the viability how the identified mix has been taken into account. An average size of dwelling of 92.90 has been assumed for the purposes of the testing. This appears to be based on a general assumption of 30% 2 bed dwellings 40% 3 bed dwellings, and 30% 4 bed dwellings. This does not align with the mix sought through the Local Plan, detailed in appendix 4 and derived from the housing needs study 2019. A flexible approach should be adopted with regards to mix, recognising demand varies from area to area and site to site, to ensure the scheme is viable, and provides an appropriate mix for the location. There is a real need to create a housing market that will attract investors and provide an element of aspiration to keep working people and families local. The evidence is time limited and only identifies current deficits. The mix has not been appropriately tested in terms of viability and Policy 8 Part A is considered unsound. Support the need for affordable housing. Framework is clear that policies must take account of need and viability. Paragraph 34 establishes the importance of viability to ensure development should not be subject to such a scale of obligations and policy burden or deliverability may be threatened. The viability report identifies 3 market value areas - low, medium and high. Tables 3 - 14 of the 2016 viability report 2016 show the issues of viability on a number of sites. In low value areas being unable to support any level of affordable housing, whilst in a number in medium areas struggle to provide 15% as required. The 2016 report concludes sites in high value areas are comfortably viable with the 25% affordable provision with other S106 policies. A reduced requirement should be adopted in medium to low value areas. The 2019 Whole Plan Viability shows a number of site typologies, including those in low value areas were unviable when tested against base assumptions. In medium and high value areas typologies were comfortably viable. However, there are some circumstances where there are viability pressures in medium value areas, significantly the additional policy costs and sensitivities were tested against the study’s base assumptions which notably included 15% affordable housing and not 23% sought by Policy 8. Concern that there is little evidence to support an affordable housing target of 15% in low value areas. Further evidence is required to support the target of 23% factoring in policy requirements on mix, design and density. There is limited justification for 23% affordable housing, and it is acknowledged that this takes no account of current completions or viability. Concern that policy requirements detailed could undermine the provision of affordable housing due to viability and this could result in regular viability assessments which the Council is seeking to avoid. This has an impact on the delivery of development and the housing target. The Council should ensure this is appropriately tested to ensure identified sites are deliverable. It is unrealistic to negotiate on a site by site basis because the base line policy bar is set too high and this will jeopardise housing delivery. It is not appropriate for all developments to include the provision of adaptable homes. Support the adaptation of existing stock and encouraging adaptable homes. Future evidence is required on the demand for custom and self build homes and the nature of this demand, including whether those on the list would actually consider building on a larger development. Para. 6.3 provides very little explanation or evidence. Policy 8 requirements are not justified and do not provide an appropriate strategy. Policy 8 and other requirements threaten the deliverability of the plan. In its current form it could fail to deliver sustainable development in accordance with policies in the framework and is inconsistent with national policy. To overcome the objection and address soundness issues: - Policy 8 Part A should be amended to so that developers are encouraged to reflect the identified mix on schemes rather than require it". - Review the approach to affordable housing to ensure it reflects the new Framework (2019) and that the evidence base and viability approach is robust and credible. - Include a flexible approach on accessible and adaptable homes and ensure the evidence base is robust and credible. - Include a flexible approach on custom build and self-build homes and ensure the evidence base is robust and credible.
The viability testing considers a number of different viability scenarios. This includes the base appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific low-cost developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in. NPPF is clear in the support for custom and self build housing and the Council maintains a Register of any such interest and the policy seeks to encourage such opportunities and is not mandatory.

### Tests of Soundness:
- Positively prepared
- Justified
- Effective
- Consistent with national
- Legally Compliant

### Summary:
Objects to policy - 23% affordable housing requirement is not justified by the evidence. 209 units/annum affordable does not take account of permissions so is an unreliable figure. The Plan should include a robust figure and the text make clear that affordable housing has to be viable. Viability testing on sites at this stage will be unreliable until a full suite of technical documents have assessed the site development costs and infrastructure requirements. The Plan should therefore reflect affordable housing requirements as aspirational but subject to detailed site viability. PROPOSED CHANGE 7. Provide a robust figure for affordable housing. As explained in detail above.

### Response:
The 23% affordable housing ask in the higher value areas is a viability-led target rather than being a solely needs-led requirement which reflects NPPF’s emphasis on the need for policies to be viable. Changes to national policy and guidance is clear that there is a need to frontload viability at plan-making stage and the need for viability appraisals as part of decision-taking will then become less of the norm. The Local Plan still however includes a policy (Policy 67) in respect to viability and all policies in the plan should be read as a whole. The viability testing evidence base has been prepared in line with all the relevant guidance and this includes assessing a number of allocations as well as hypothetical sites.
7.1. Policy 8 seeks to ensure the right range, type, size and tenure of homes are delivered within Doncaster. Avant Homes is concerned with some aspects of this policy, and the robustness of the whole plan viability. Avant Homes therefore consider that the Policy 8 is unsound. Test of Soundness 7.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 7.3. Avant Homes is concerned with a number of approaches and criteria established within Policy 8. Housing Mix 7.4. Avant Homes is supportive of the principle of providing a broad mix of housing. However the Local Plan should not dictate housing mix across the borough. The local Plan should achieve this housing mix through identifying the level of provision and the broad distribution of new housing. 7.5. Importantly there does not appear to be an up to date Strategic Housing Market Assessment with the Housing Needs Survey being dated 2015 with an update in 2016. The Economic Forecasts and Housing Needs Assessment does not consider housing mix. The Housing needs survey summary 2019 (ARC4) only appears to deal with the total affordable need and size of affordable dwellings, in terms of number of bedrooms. Therefore there is a lack of evidence base for this policy approach. It is acknowledged that Appendix 4 summarises the findings of the housing need survey 2019, however the full study is not publically available. Avant Homes reserve the right to comment further when this becomes available. 7.6. Although SHMA and Appendix 4 of the Plan, derived from the Housing Need Study 2019, considers the broad issues of housing mix, the Local Plan should not seek to control the housing mix, since it would mean that the market would be unable to adjust to changes in the market. Policy 8 seeks to specifically address the housing mix on sites. This aspect of the policy is onerous and prescriptive, particularly as it is seeking to control the size of units, mix and tenure. The policy should be amended to encourage or reflect, rather than require. 7.7. It is unclear from the Whole Plan Viability Study how the identified mix has been taken into account. An average size of dwelling of 92.90 has been assumed for the purposes of the testing. This appears to be based on a general assumption of 30% 2 bed dwellings 40% 3 bed dwellings, and 30 % 4 bed dwellings. This does not align with the mix sought through the Local Plan, detailed in appendix 4 and derived from the housing needs study 2019. 7.8. Avant Homes recommend that a flexible approach is taken regarding housing mix, which recognises that the need and demand will vary from area to area and site to site, to ensure that the scheme is viable, and provides an appropriate mix for the location. There is a real need to create a housing market in Doncaster that will attract investors to Doncaster and provide an element of aspiration to ensure working people and families are retained within the area. The evidence presented in the plan is time limited, and only identifies current deficits. Avant Homes has been unable to review the full findings of the Housing Needs Study 2019, and reserves the right for further comment in this regard. However, Avant Homes considers that the mix required by policy 8 has not been appropriate tested in terms of viability and considers Policy 8 Part A to be unsound. The policy should be amended to encourage to reflect the identified mix rather than require it. Affordable housing 7.9. Avant Homes is supportive of the need for affordable housing. The Framework is however clear that affordable housing policies must not only take account of need but also viability. Paragraph 34 of the Framework (2019) established the importance of viability to ensure that development identified in the Plan should not be subject to such a scale of obligations and policy burden that their ability to be delivered might be threatened. 7.10. The updated viability (2019), builds upon the earlier assessment and updates it in line with the emerging policies and the revised Framework. The assessment continues to identify three market value areas (low, medium and high) within Doncaster. 7.11. Tables 3-14 of the 2016 Viability Report show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support any level of affordable housing, whilst a number of schemes in the medium value areas would also struggle to provide the 15 percent required by this policy. 7.12. The 2016 Viability report previously concluded that sites located within high value areas are comfortably viable with the Councils proposed affordable housing provision of 25%, together with draft S106 policies. However for sites within medium to low value areas it was noted that the viability pressure was greater, and a reduced requirement should be adopted. 7.13. The 2019 Whole Plan Viability Study assesses the impact of the Plan requirements. Appendices 3 to 10 of the 2019 Whole Plan Viability Study demonstrate viability issues for a number of site typologies, including all typologies in low value areas. Typologies in low value areas were unviable when tested against the base assumptions. The study concluded that in high and medium value areas site typologies were comfortably viable. However, there are some circumstances were there are viability pressures in medium value areas, significantly the additional policy costs and sensitivities were tested against the study’s base assumptions which notably included 15% affordable housing and not 23% sought by Policy 8. 7.14. Avant Homes are concerned that there is little evidence to support an affordable housing target of 15% in low value areas. Avant Homes consider that further viability evidence is required to support the target of 23% in combination with the policy requirements of the plan, including, mix, housing design standards, and density. Further there is limited justification in the Plan or associated evidence for a target of 23% affordable housing. The explanatory text states that the current need for affordable housing represents 23% of the Local Plan requirement for housing. Paragraph 6.9 states that this does not take into account current completions or viability. 7.15. Avant Homes is concerned that with all the policy requirements the Local Plan details this could undermine the provision of affordable housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is appropriately tested to ensure the sites identified and allocated are deliverable. 7.16. 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. Adaptable and Accessible Homes. 7.17. Part D of the policy states that new development should aim to include the provision of homes which are adaptable, accessible and suitable for people with a wide range of needs. Avant Homes supports the adaptation of the existing stock and encouraging the provision of adaptable, accessible homes. However, as explained in response to Policy 46 Avant Homes object and does not consider it appropriate to require all developments to include this provision. Custom and Self Build Homes. 7.18. Avant Homes understands the need and supports the delivery of Self-Build and Custom Build housing. Avant Homes understands the idea of increasing the self-build and custom build sector for its potential contribution to the overall housing supply. 7.19. Avant Homes consider that further evidence should be provided in respect of the level of demand in Doncaster for self and custom build and the nature of demand, including, whether those wanting to self-build would actually consider building within a larger housing development. As it stands paragraph 6.3 of the Plan provides very little explanation or evidence to support the policy. The plan is therefore not sound. However, if part A has increased flexibility, revised housing targets and increased flexibility in the approach to custom and self build, alongside robust evidence supporting the requirements the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change. 7.23. To overcome the objection and address soundness matters, the Council should: - Policy 8 Part A should be amended to so that developers are encouraged to reflect the identified mix on schemes rather than require it. - Review the approach to affordable housing to ensure it reflects the new Framework (2019) and that the evidence base and viability approach is robust and credible. - Include a flexible approach on custom build and self-build homes and ensure the evidence base is robust and credible.

Summary:
Concerned with some aspects of the policy and the robustness of the plan viability. Consider the policy unsound. Supportive of the principal of a broad mix of housing. The Local Plan should not dictate housing mix across the borough. The Local Plan should achieve this mix through identifying the level of provision and broad distribution of new housing. There is no up to date SHMA with the HNS being dated 2015 & 2016. The PBA report does not consider mix. The ARCA summary only deals with total affordable need and size of affordable dwellings in terms of bedrooms. The study is not publicly available and there is a lack of evidence base for this approach. Reserve the right to comment when the report is available. The Local Plan should not control housing mix as the market would be unable to adjust to changes in the market. The policy is onerous and prescriptive particularly with regards to controlling unit size, mix and tenure. The policy should be amended to encourage or reflect, rather than require. It is unclear from the viability study how mix has been taken into account. An average size of dwelling of 92.90 has been assumed for the purposes of the testing. This appears to be based on a general assumption of 30% 2 bed dwellings 40% 3 bed dwellings, and 30% 4 bed dwellings. This does not align with the mix sought through the Local Plan, detailed in appendix 4 and derived from the housing needs study 2019. Recommend a flexible approach is applied regarding housing mix, recognising need and demand will vary from area to area and site to site to ensure the scheme is viable and provides for an appropriate mix for the location. There is a need to create a housing market that will attract investors and provide aspirational housing. Evidence presented is time limited and only identifies current deficits. The policy has not been appropriately tested and considers Policy 8 Part A unsound. Supportive of need for affordable housing. The framework is clear that policies must not only take account of need but also viability (para 34 NPPF). Concern that additional policy costs and sensitivities were tested against base assumptions which notably included 15% affordable housing and not 23%. Little evidence to support 15% affordable in low value areas and further viability work is required to justify 23% in combination with other policies in the plan. The justification for 23% is limited. Concerned that policy requirements in the plan could undermine the provision of affordable housing through the need for viability assessments on a regular basis. The viability assessment shows a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is appropriately tested to ensure the sites identified and allocated are deliverable. 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. Support the adaptation of existing stock and encouraging adaptable, accessible homes. However, as explained in response to Policy 46 Avant Homes object and does not consider it appropriate to require all developments to include this provision. Further evidence should be provided on custom and self build homes and ensure the evidence base is robust and credible.

Response:
The viability testing considers a number of different viability scenarios. This includes the ‘base’ appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific ‘low-cost’ developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in. NPPF is clear in the support for custom and self build housing and the Council maintains a Register of any such interest and the policy seeks to ‘encourage’ such opportunities and is not mandatory.
7.1. Policy 8 seeks to ensure the right range, type, size and tenure of homes are delivered within Doncaster. Avant Homes is concerned with some aspects of this policy, and the robustness of the whole plan viability. Avant Homes therefore consider that the Policy 8 is unsound. Test of Soundness 7.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 7.3. Avant Homes is concerned with a number of approaches and criteria established within Policy 8. Housing Mix 7.4. Avant Homes is supportive of the principle of providing a broad mix of housing. However the Local Plan should not dictate housing mix across the borough. The local Plan should achieve this housing mix through identifying the level of provision and the broad distribution of new housing. 7.5. 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There is a real need to create a housing market in Doncaster that will attract investors to Doncaster and provide an element of aspiration to ensure working people and families are retained within the area. The evidence presented in the plan is time limited, and only identifies current deficits. Avant Homes has been unable to review the full findings of the Housing Needs Study 2019, and reserves the right for further comment in this regard. However, Avant Homes considers that the mix required by policy 8 has not been appropriately tested in terms of viability and considers Policy 8 Part A to be unsound. The policy should be amended to encourage to reflect the identified mix rather than require it. Affordable housing 7.9. Avant Homes is supportive of the need for affordable housing. The Framework is however clear that affordable housing policies must not only take account of need but also viability. 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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. Adaptive and Accessible Homes 7.17. Part D of the policy states that new development should aim to include the provision of homes which are adaptable, accessible and suitable for people with a wide range of needs. Avant Homes supports the adaptation of the existing stock and encouraging the provision of adaptable, accessible homes. However, as explained in response to Policy 46 Avant Homes object and does not consider it appropriate to require all developments to include this provision. Custom and Self Build Homes 7.18. Avant Homes understands the need and supports the delivery of Self-Build and Custom Build housing. Avant Homes understands the idea of increasing the self-build and custom build sector for its potential contribution to the overall housing supply. 7.19. Avant Homes consider that further evidence should be provided in respect of the level of demand in Doncaster for self and custom build and the nature of demand, including, whether those wanting to self-build would actually consider building within a larger housing development. As it stands paragraph 6.3 of the Plan provides very little explanation or evidence to support the policy. 7.20. Avant Homes consider that the requirements in Policy 8 are not justified and do not provide an appropriate strategy. Avant Homes consider that Policy 8 along with other policy requirements within the Plan could threaten the deliverability of the Plan. The Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 7.21. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 7.22. However, Avant Homes consider that with increased flexibility in Part A, revised affordable housing targets, and increased flexibility in the approach on custom and self build alongside robust evidence supporting the requirements the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 7.23. To overcome the objection and address soundness matters, the Council should: - Policy 8 Part A should be amended to so that developers are encouraged to reflect the identified mix on schemes rather than require it”. - Review the approach to affordable housing to ensure it reflects the new Framework (2019) and that the evidence base and viability approach is robust and credible. - Include a flexible approach on custom build and self-build homes and ensure the evidence base is robust and credible.

Summary:

Concerned with some aspects of the policy and the robustness of the plan viability. Consider the policy unsound. Supportive of the principal of a broad mix of housing. The Local Plan should not dictate housing mix across the borough. The Local Plan should achieve this mix through identifying the level of provision and broad distribution of new housing. There is no up to date SHMA with the HNS being dated 2015 & 2016. The PBA report does not consider mix. The ARCA summary only deals with total affordable need and size of affordable dwellings in terms of bedrooms. The study is not publicly available and there is a lack of evidence base for this approach. Reserve the right to comment when the report is available. The Local Plan should not control housing mix as the market would be unable to adjust to changes in the market. The policy is onerous and prescriptive particularly with regards to controlling unit size, mix and tenure. The policy should be amended to encourage or reflect, rather than require. It is unclear from the viability study how mix has been taken into account. An average size of dwelling of 92.90 has been assumed for the purposes of the testing. This appears to be based on a general assumption of 30% 2 bed dwellings 40 % 3 bed dwellings, and 30 % 4 bed dwellings. This does not align with the mix sought through the Local Plan, detailed in appendix 4 and derived from the housing needs study 2019. Recommend a flexible approach is applied regarding housing mix, recognising need and demand will vary from area to area and site to site to ensure the scheme is viable and provides for an appropriate mix for the location. There is a need to create a housing market that will attract investors and provide aspirational housing. Evidence presented is time limited and only identifies current deficits. The policy has not been appropriately tested and considers Policy 8 Part A unsound. Supportive of need for affordable housing. The framework is clear that policies must not only take account of need but also viability (para 34 NPPF). Concern that additional policy costs and sensitivities were tested against base assumptions which notably included 15% affordable housing and not 23%. Little evidence to support 15% affordable in low value areas and further viability work is required to justify 23% in combination with other policies in the plan. The justification for 23% is limited. Concerned that policy requirements in the plan could undermine the provision of affordable housing through the need for viability assessments on a regular basis. The viability assessment shows a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is appropriately tested to ensure the sites identified and allocated are deliverable. 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. Support the adaptation of existing stock and encouraging adaptable, accessible homes. However, as explained in response to Policy 46 Avant Homes object and does not consider it appropriate to require all developments to include this provision. Further evidence should be provided on custom and self build and the nature of demand, including whether those wanting to self-build would actually consider building within a larger housing development. As it stands paragraph 6.3 of the Plan provides very little explanation or evidence to support the policy. The plan is therefore not sound. However, if part A has increased flexibility, revised housing targets and increased flexibility in the approach to custom and self build, alongside robust supporting evidence, it can be found sound. Proposed changes: To overcome the objection and address soundness matters, the Council should: - Policy 8 Part A should be amended to so that developers are encouraged to reflect the identified mix on schemes rather than require it”. - Review the approach to affordable housing to ensure it reflects the new Framework (2019) and that the evidence base and viability approach is robust and credible. - Include a flexible approach on accessible and adaptable homes and ensure the evidence base is robust and credible. - Include a flexible approach on custom build and self-build homes and ensure the evidence base is robust and credible.

Response:

The viability testing considers a number of different viability scenarios. This includes the ‘base’ appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific ‘low-cost’ developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in. NPPF is clear in the support for custom and self build housing and the Council maintains a Register of any such interest and the policy seeks to ‘encourage’ such opportunities and is not mandatory.
7.1. Policy 8 seeks to ensure the right range, type, size and tenure of homes are delivered within Doncaster. Avant Homes is concerned with some aspects of this policy, and the robustness of the whole plan viability. Avant Homes therefore consider that the Policy 8 is unsound. Test of Soundness 7.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 7.3. Avant Homes is concerned with a number of approaches and criteria established within Policy 8. Housing Mix 7.4. Avant Homes is supportive of the principle of providing a broad mix of housing. However the Local Plan should not dictate housing mix across the borough. The local Plan should achieve this housing mix through identifying the level of provision and the broad distribution of new housing. 7.5. Importantly there does not appear to be an up to date Strategic Housing Market Assessment with the Housing Needs Survey being dated 2015 with an update in 2016. The Economic Forecasts and Housing Needs Assessment does not consider housing mix. The Housing needs survey summary 2019 (ARC4) only appears to deal with the total affordable need and size of affordable dwellings, in terms of number of bedrooms. Therefore there is a lack of evidence base for this policy approach. It is acknowledged that Appendix 4 summarises the findings of the housing need survey 2019, however the full study is not publicly available. Avant Homes reserve the right to comment further when this becomes available. 7.6. Although SHMA and Appendix 4 of the Plan, derived from the Housing Need Study 2019, considers the broad issues of housing mix, the Local Plan should not seek to control the housing mix, since it would mean that the market would be unable to adjust to changes in the market. Policy 8 seeks to specifically address the housing mix on sites. This aspect of the policy is onerous and prescriptive, particularly as it is seeking to control the size of units, mix and tenure. The policy should be amended to encourage or reflect, rather than require. 7.7. It is unclear from the Whole Plan Viability Study how the identified mix has been taken into account. An average size of dwelling of 92.90 has been assumed for the purposes of the testing. This appears to be based on a general assumption of 30% 2 bed dwellings 40% 3 bed dwellings, and 30% 4 bed dwellings. This does not align with the mix sought through the Local Plan, detailed in appendix 4 and derived from the housing needs study 2019. 7.8. Avant Homes recommend that a flexible approach is taken regarding housing mix, which recognises that the need and demand will vary from area to area and site to site, to ensure that the scheme is viable, and provides an appropriate mix for the location. There is a real need to create a housing market in Doncaster that will attract investors to Doncaster and provide an element of aspiration to ensure working people and families are retained within the area. The evidence presented in the plan is time limited, and only identifies current deficits. Avant Homes has been unable to review the full findings of the Housing Needs Study 2019, and reserves the right for further comment in this regard. However, Avant Homes considers that the mix required by policy 8 has not been appropriately tested in terms of viability and considers Policy 8 Part A to be unsound. The policy should be amended to encourage to reflect the identified mix rather than require it. Affordable housing 7.9. Avant Homes is supportive of the need for affordable housing. The Framework is however clear that affordable housing policies must not take account of need but also viability. Paragraph 34 of the Framework (2019) established the importance of viability to ensure that development identified in the Plan should not be subject to such a scale of obligations and policy burden that their ability to be delivered might be threatened. 7.10. The updated viability (2019), builds upon the earlier assessment and updates it in line with the emerging policies and the revised Framework. The assessment continues to identify three market value areas (low, medium and high) within Doncaster. 7.11. Tables 3-14 of the 2016 Viability Report show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support any level of affordable housing, whilst a number of schemes in the medium value areas would also struggle to provide the 15 percent required by this policy. 7.12. The 2016 Viability report previously concluded that sites located within high value areas are comfortably viable with the Councils proposed affordable housing provision of 25%, together with draft S106 policies. However for sites within medium to low value areas it was noted that the viability pressure was greater, and a reduced requirement should be adopted. 7.13. The 2019 Whole Plan Viability Study assesses the impact of the Plan requirements. Appendices 3 to 10 of the 2019 Whole Plan Viability Study demonstrate viability issues for a number of site typologies, including all typologies in low value areas. Typologies in low value areas were unviable when tested against the base assumptions. The study concluded that in high and medium value areas site typologies were comfortably viable. However, there are some circumstances were there were viability pressures in medium value areas, significantly the additional policy costs and sensitivities were tested against the study’s base assumptions which notably included 15% affordable housing and not 23% sought by Policy 8. 7.14. Avant Homes are concerned that there is little evidence to support an affordable housing target of 15% in low value areas. Avant Homes consider that further viability evidence is required to support the target of 23% in combination with the policy requirements of the plan, including, mix, housing design standards, and density. Further there is limited justification in the Plan or associated evidence for a target of 23% affordable housing. The explanatory text states that the current need for affordable housing represents 23% of the Local Plan requirement for housing. Paragraph 6.9 states that this does not take into account current completions or viability. 7.15. Avant Homes is concerned that with all the policy requirements the Local Plan details this could undermine the provision of affordable housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is appropriately tested to ensure the sites identified and allocated are deliverable. 7.16. The Council should
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Summary:

Concerned with some aspects of the policy and the robustness of the plan viability. Consider the policy unsound. Supportive of the principal of a broad mix of housing. The Local Plan should not dictate housing mix across the borough. The Local Plan should achieve this mix through identifying the level of provision and broad distribution of new housing. There is no up to date SHMA with the HNS being dated 2015 & 2016. The PBA report does not consider mix. The ARCA summary only deals with total affordable need and size of affordable dwellings in terms of bedrooms. The study is not publicly available and there is a lack of evidence base for this approach. Reserve the right to comment when the report is available. The Local Plan should not control housing mix as the market would be unable to adjust to changes in the market. The policy is onerous and prescriptive particularly with regards to controlling unit size, mix and tenure. The policy should be amended to encourage or reflect, rather than require. It is unclear from the viability study how mix has been taken into account. An average size of dwelling of 92.90 has been assumed for the purposes of the testing. This appears to be based on a general assumption of 30% 2 bed dwellings 40% 3 bed dwellings, and 30% 4 bed dwellings. This does not align with the mix sought through the Local Plan, detailed in appendix 4 and derived from the housing needs study 2019. Recommend a flexible approach is applied regarding housing mix, recognising need and demand will vary from area to area and site to site to ensure the scheme is viable and provides for an appropriate mix for the location. There is a need to create a housing market that will attract investors and provide aspirational housing. Evidence presented is time limited and only identifies current deficits. The policy has not been appropriately tested and considers Policy 8 Part A unsound. Supportive of need for affordable housing. The framework is clear that policies must not only take account of need but also viability (para 34 NPPF). Concern that additional policy costs and sensitivities were tested against base assumptions which notably included 15% affordable housing and not 23%. Little evidence to support 15% affordable in low value areas and further viability work is required to justify 23% in combination with other policies in the plan. The justification for 23% is limited. Concerned that policy requirements in the plan could undermine the provision of affordable housing through the need for viability assessments on a regular basis. The viability assessment shows a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is appropriately tested to ensure the sites identified and allocated are deliverable. 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. Support the adaptation of existing stock and encouraging adaptable, accessible homes. However, as explained in response to Policy 46 Avant Homes object and does not consider it appropriate to require all developments to include this provision. Further evidence should be provided on custom and self build homes and the nature of demand, including whether those wanting to self-build would actually consider building within a larger housing development. As it stands paragraph 6.3 of the Plan provides very little explanation or evidence to support the policy. The plan is therefore not sound. However, if part A has increased flexibility, revised housing targets and increased flexibility in the approach to custom and self build, alongside robust supporting evidence, it can be found sound. Proposed changes: To overcome the objection and address soundness matters, the Council should: - Policy 8 Part A should be amended to so that developers are encouraged to reflect the identified mix on schemes rather than require it. - Review the approach to affordable housing to ensure it reflects the new Framework (2019) and that the evidence base and viability approach is robust and credible. - Include a flexible approach on accessible and adaptable homes and ensure the evidence base is robust and credible. - Include a flexible approach on custom build and self-build homes and ensure the evidence base is robust and credible.

Response:

The viability testing considers a number of different viability scenarios. This includes the 'base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost' developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in. NPPF is clear in the support for custom and self build housing and the Council maintains a Register of any such interest and the policy seeks to 'encourage' such opportunities and is not mandatory.
Policy 8 seeks to ensure the right range, type, size and tenure of homes are delivered within Doncaster. Avant Homes is concerned with some aspects of this policy, and the robustness of the whole plan viability. Avant Homes therefore consider that the Policy 8 is unsound. Test of Soundness 5.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 5.3. Avant Homes is concerned with a number of approaches and criteria established within Policy 8. Housing Mix 5.4. Avant Homes is supportive of the principle of providing a broad mix of housing. However the Local Plan should not dictate housing mix across the borough. The local Plan should achieve this housing mix through identifying the level of provision and the broad distribution of new housing. 5.5. Importantly there does not appear to be an up to date Strategic Housing Market Assessment with the Housing Needs Survey being dated 2015 with an update in 2016. The Economic Forecasts and Housing Needs Assessment does not consider housing mix. The Housing needs survey summary 2019 (ARC4) only appears to deal with the total affordable need and size of affordable dwellings, in terms of number of bedrooms. Therefore there is a lack of evidence base for this policy approach. It is acknowledged that Appendix 4 summarises the findings of the housing need survey 2019, however the full study is not publically available yet. Avant Homes reserve the right to comment further when this becomes available. 5.6. Although SHMA and Appendix 4 of the Plan, derived from the Housing Need Study 2019, considers the broad issues of housing mix, the Local Plan should not seek to control the housing mix on sites. This aspect of the policy is onerous and prescriptive, particularly as it is seeking to control the size of units, mix and tenure. The policy should be amended to encourage or reflect, rather than require. 5.7. It is unclear from the Whole Plan Viability Study how the identified mix has been taken into account. An average size of dwelling of 92.90 has been assumed for the purposes of the testing. This appears to be based on a general assumption of 30% 2 bed dwellings 40 % 3 bed dwellings, and 30 % 4 bed dwellings. This does not align with the mix sought through the Local Plan, detailed in appendix 4 and derived from the housing needs study 2019. 5.8. Avant Homes recommend that a flexible approach is taken regarding housing mix, which recognises that the need and demand will vary from area to area and site to site, to ensure that the scheme is viable, and provides an appropriate mix for the location. There is a real need to create a housing market in Doncaster that will attract investors to Doncaster and provide an element of aspiration to ensure working people and families are retained within the area. The evidence presented in the plan is time limited, and only identifies current deficits. Avant Homes has been unable to review the full findings of the Housing Needs Study 2019, and reserves the right for further comment in this regard. However, Avant Homes considers that the mix required by policy 8 has not been appropriately tested in terms of viability and considers Policy 8 Part A to be unsound. The policy should be amended to encourage the identified mix rather than require it. Affordable housing 5.9. Avant Homes is supportive of the need for affordable housing. The Framework is however clear that affordable housing policies must not only take account of need but also viability. Paragraph 34 of the Framework (2019) established the importance of viability to ensure that development identified in the Plan should not be subject to such a scale of obligations and policy burden that their ability to be delivered might be threatened. 5.10. The updated viability (2019), builds upon the earlier assessment and updates it in line with the emerging policies and the revised Framework. The assessment continues to identify three market value areas (low, medium and high) within Doncaster. 5.11. Tables 3-14 of the 2016 Viability Report show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support any level of affordable housing, whilst a number of schemes in the medium value areas would also struggle to provide the 15 percent required by this policy. 5.12. The 2016 Viability report previously concluded that sites located within high value areas are comfortably viable with the Councils proposed affordable housing provision of 25%, together with draft S106 policies. However for sites within medium to low value areas it was noted that the viability pressure was greater, and a reduced requirement should be adopted. 5.13. The 2019 Whole Plan Viability Study assesses the impact of the Plan requirements. Appendices 3 to 10 of the 2019 Whole Plan Viability Study demonstrate viability issues for a number of site typologies, including all typologies in low value areas. Typologies in low value areas were unviable when tested against the base assumptions. The study concluded that in high and medium value areas site typologies were comfortably viable. However, there were some circumstances were there were viability pressures in medium value areas, significantly the additional policy costs and sensitivities were tested against the study’s base assumptions which notably included 15% affordable housing and not 23% sought by Policy 8. 5.14. Avant Homes are concerned that there is little evidence to support an affordable housing target of 15% in low value areas. Avant Homes consider that further viability evidence is required to support the target of 23% in combination with the policy requirements of the plan, including, mix, housing design standards, and density. Further there is limited justification in the Plan or associated evidence for a target of 23% affordable housing. The explanatory text states that the current need for affordable housing represents 23% of the Local Plan requirement for housing. Paragraph 6.9 states that this does not take into account current completions or viability. 5.15. 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Policy 8 - Delivering the necessary range of housing. 5.16. 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. 5.17. Part D of the policy states that new development should aim to include the provision of homes which are adaptable, accessible and suitable for people with a wide range of needs. Avant Homes supports the adaptation of the existing stock and encouraging the provision of adaptable, accessible homes. However, as explained in response to Policy 46 Avant Homes object and does not consider it appropriate to require all developments to include this provision. 5.18. Avant Homes understands the need and supports the delivery of Self-Build and Custom Build housing. Avant Homes understands the idea of increasing the self-build and custom build sector for its potential contribution to the overall housing supply. 5.19. Avant Homes consider that further evidence should be provided in respect of the level of demand in Doncaster for self and custom build and the nature of demand, including, whether those wanting to self-build would actually consider building within a larger housing development. As it stands paragraph 6.3 of the Plan provides very little explanation or evidence to support the policy. 5.20. Avant Homes consider that the requirements in Policy 8 are not justified and do not provide an appropriate strategy. Avant Homes consider that Policy 8 along with other policy requirements within the Plan could threaten the deliverability of the Plan. The Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 5.21. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 5.22. However, Avant Homes consider that with increased flexibility in Part A, revised affordable housing targets, and increased flexibility in the approach on custom and self build alongside robust evidence supporting the requirements the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. 5.23. To overcome the objection and address soundness matters, the Council should: - Policy 8 Part A should be amended to so that developers are encouraged to reflect the identified mix on schemes rather than require it; - Revise the approach to affordable housing to ensure that the evidence base and viability is robust and credible; and - Include a flexible approach on custom build and self build homes and ensure that the evidence base is robust and credible.

Summary:
Policy 8 - Delivering the necessary range of housing. o SHMA and Housing needs study are out of date - evidence base needs updating. Housing Mix. 1. Lack of evidence for approach taken. 2. Local Plan should not seek to control the housing mix - to prescriptive. 3. This aspect of policy should 'encourage' rather than 'require'. 4. Flexible approach should be taken - need to vary rea to area. 5. Mix in Policy has not been appropriately viability tested. Affordable Housing. 1. Little evidence to support target of 15% in low value areas. 2. Little justification of the 23% target. 3. The need for regular viability assessment could undermine deliverability. 4. Unrealistic to negotiate each site on a one by one basis - could jeopardise delivery. 5. Policy needs to reflect NPPF 2019. Adaptable and Accessible Homes. 1. Re Part D 2. Support principles of policy but does not consider it appropriate to require all developments to include this provision. 3. Should be a more flexible approach. Custom and Self-Build Homes. 1. Further evidence needed of the level of demand. 2. Para 6.3 provides little explanation as to evidence to support the policy. 3. Should be a more flexible approach.

Response:
The viability testing considers a number of different viability scenarios. This includes the 'base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost' developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in. NPPF is clear in the support for custom and self build housing and the Council maintains a Register of any such interest and the policy seeks to 'encourage' such opportunities and is not mandatory.
Policy 8: Delivering the Necessary Range of Housing

Tests of Soundness:
- Positively prepared
- Justified
- Effective
- Consistent with national

Comment:

7.1. Policy 8 seeks to ensure the right range, type, size and tenure of homes are delivered within Doncaster. Priority Space is concerned with some aspects of this policy, and the robustness of the whole plan viability. Priority Space therefore consider that the Policy 8 is unsound. Test of Soundness 7.2. Priority Space considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 7.3. Priority Space is concerned with a number of approaches and criteria established within Policy 8. Housing Mix 7.4. Priority Space is supportive of the principle of providing a broad mix of housing. However the Local Plan should not dictate housing mix across the borough. The local Plan should achieve this housing mix through identifying the level of provision and the broad distribution of new housing. 7.5. Importantly there does not appear to be an up to date Strategic Housing Market Assessment with the Housing Needs Survey being dated 2015 with an update in 2016. The Economic Forecasts and Housing Needs Assessment does not consider housing mix. The Housing needs survey summary 2019 (ARC4) only appears to deal with the total affordable need and size of affordable dwellings, in terms of number of bedrooms. Therefore there is a lack of evidence base for this policy approach. It is acknowledged that Appendix 4 summarises the findings of the housing need survey 2019, however the full study does not publically available yet. Priority Space reserve the right to comment further when this becomes available. 7.6. Although SHMA and Appendix 4 of the Plan, derived from the Housing Need Study 2019, considers the broad issues of housing mix, the Local Plan should not seek to control the housing mix, since it would mean that the market would be unable to adjust to changes in the market. Policy 8 seeks to specifically address the housing mix on sites. This aspect of the policy is onerous and prescriptive, particularly as it is seeking to control the size of units, mix and tenure. The policy should be amended to encourage or reflect, rather than require. 7.7. It is unclear from the Whole Plan Viability Study how the identified mix has been taken into account. An average size of dwelling of 92.90 has been assumed for the purposes of the testing. This appears to be based on a general assumption of 30% 2 bed dwellings 40 % 3 bed dwellings, and 30 % 4 bed dwellings. This does not align with the mix sought through the Local Plan, detailed in appendix 4 and derived from the housing needs study 2019. 7.8. Priority Space recommend that a flexible approach is taken regarding housing mix, which recognises that the need and demand will vary from area to area and site to site, to ensure that the scheme is viable, and provides an appropriate mix for the location. There is a real need to create a housing market in Doncaster that will attract investors to Doncaster and provide an element of aspiration to ensure working people and families are retained within the area. The evidence presented in the plan is time limited, and only identifies current deficits. Priority Space has been unable to review the full findings of the Housing Needs Study 2019, and reserves the right for further comment in this regard. However, Priority Space considers that the mix required by policy 8 has not been appropriately tested in terms of viability and considers Policy 8 Part A to be unsound. The policy should be amended to encourage to reflect the identified mix rather than require it. Affordable housing 7.9. Priority Space is supportive of the need for affordable housing. The Framework is however clear that affordable housing policies must not only take account of need but also viability. Paragraph 34 of the Framework (2019) established the importance of viability to ensure that development identified in the Plan should not be subject to such a scale of obligations and policy burden that their ability to be delivered might be threatened. 7.10. The updated viability (2019), builds upon the earlier assessment and updates it in line with the emerging policies and the revised Framework. The assessment continues to identify three market value areas (low, medium and high) within Doncaster. 7.11. Tables 3-14 of the 2016 Viability Report show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not to support any level of affordable housing, whilst a number of schemes in the medium value areas would also struggle to provide the 15 percent required by this policy. 7.12. The 2016 Viability report previously concluded that sites located within high value areas are comfortably viable with the Councils proposed affordable housing provision of 25%, together with draft S106 policies. However for sites within medium to low value areas it was noted that the viability pressure was greater, and a reduced requirement should be adopted. 7.13. The 2019 Whole Plan Viability Study assesses the impact of the Plan requirements. Appendices 3 to 10 of the 2019 Whole Plan Viability Study demonstrate viability issues for a number of site typologies, including all typologies in low value areas. Typologies in low value areas were unviable when tested against the base assumptions. The study concluded that in high and medium value areas site typologies were comfortably viable. However, there are some circumstances were there are viability pressures in medium value areas, significantly the additional policy costs and sensitivities were tested against the study’s base assumptions which notably included 15% affordable housing and not 23% sought by Policy 8. 7.14. Priority Space are concerned that there is little evidence to support an affordable housing target of 15% in low value areas. Priority Space consider that further viability evidence is required to support the target of 23% in combination with the policy requirements of the plan, including, mix, housing design standards, and density. Further there is limited justification in the Plan or associated evidence for a target of 23% affordable housing. The explanatory text states that the current need for affordable housing represents 23% of the Local Plan requirement for housing. Paragraph 6.9 states that this does not take into account current completions or viability. 7.15. Priority Space is concerned that with all the policy requirements the Local Plan details this could undermine the provision of affordable housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is appropriately tested to ensure the sites identified and allocated are...
deliverable. 7.16. 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. Adaptable and Accessible Homes 7.17. Part D of the policy states that new development should aim to include the provision of homes which are adaptable, accessible and suitable for people with a wide range of needs. Priority Space supports the adaptation of the existing stock and encouraging the provision of adaptable, accessible homes. However, as explained in response to Policy 46 Priority Space object and does not consider it appropriate to require all developments to include this provision. Custom and Self Build Homes 7.18. Priority Space understands the need and supports the delivery of Self-Build and Custom Build housing. Priority Space understands the idea of increasing the self-build and custom build sector for its potential contribution to the overall housing supply. 7.19. Priority Space consider that further evidence should be provided in respect of the level of demand in Doncaster for self and custom build and the nature of demand, including, whether those wanting to self-build would actually consider building within a larger housing development. As it stands paragraph 6.3 of the Plan provides very little explanation or evidence to support the policy. 7.20. Priority Space consider that the requirements in Policy 8 are not justified and do not provide an appropriate strategy. Priority Space consider that Policy 8 along with other policy requirements within the Plan could threaten the deliverability of the Plan. The Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 7.21. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 7.22. However, Priority Space consider that with increased flexibility in Part A, revised affordable housing targets, and increased flexibility in the approach on custom and self build alongside robust evidence supporting the requirements the Local Plan can be found sound. Priority Space will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 7.23. To overcome the objection and address soundness matters, the Council should: - Policy 8 Part A should be amended to so that developers are encouraged to reflect the identified mix on schemes rather than require it”. - Review the approach to affordable housing to ensure it reflects the new Framework (2019) and that the evidence base and viability approach is robust and credible. - Include a flexible approach on accessible and adaptable homes and ensure the evidence base is robust and credible. - Include a flexible approach on custom build and self-build homes and ensure the evidence base is robust and credible.

Summary:
Policy 8 - Delivering the necessary range of housing. o SHMA and Housing needs study are out of date - evidence base needs updating. Housing Mix. 1. Lack of evidence for approach taken. 2. Local Plan should not seek to control the housing mix - to prescriptive. 3. This aspect of policy should 'encourage' rather than 'require'. 4. Flexible approach should be taken - need to vary rea to area. 5. Mix in Policy has not been appropriately viability tested. Affordable Housing. 1. Little evidence to support target of 15% in low value areas. 2. Little justification of the 23% target. 3. The need for regular viability assessment could undermine deliverability. 4. Unrealistic to negotiate each site on a one by one basis - could jeopardise delivery. 5. Policy needs to reflect NPPF 2019. Adaptable and Accessible Homes. 1. Re Part D 2. Support principles of policy but does not consider it appropriate to require all developments to include this provision. 3. Should be a more flexible approach. Custom and self-Build Homes 1. Further evidence needed of the level of demand. 2. Para 6.3 provides little explanation as to evidence to support the policy. 3. Should be a more flexible approach.

Response:
The viability testing considers a number of different viability scenarios. This includes the 'base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost' developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in. NPPF is clear in the support for custom and self build housing and the Council maintains a Register of any such interest and the policy seeks to 'encourage' such opportunities and is not mandatory.
Policy 8 - Delivering the Necessary Range of Housing

1. Site 446 will be able to deliver the minimum affordable housing requirement. 2. There is no specific mention within the policy itself of the affordable housing requirement being subject to viability testing. Object to the policy as currently drafted on the grounds that it is not in accordance with the Framework. 3. Reference should be made to Policy 67 (development viability).

Response:
Support for the principle of the policy welcomed. It is not considered that there needs to be cross-reference to Policy 67: Development Viability as the introduction to the Local plan itself at para 1.14 is explicitly clear that all the policies should be read together and that individual policies do not necessarily refer to other relevant policies.
Policy 8 seeks to ensure the right range, type, size and tenure of homes are delivered within Doncaster. Firsure is concerned with some aspects of this policy, and the robustness of the whole plan viability. Firsure therefore consider that the Policy 8 is unsound. Test of Soundness

7.2. Firsure considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 7.3. Firsure is concerned with a number of approaches and criteria established within Policy 8. Housing Mix 7.4. Firsure is supportive of the principle of providing a broad mix of housing. However the Local Plan should not dictate housing mix across the borough. The local Plan should achieve this housing mix through identifying the level of provision and the broad distribution of new housing. 7.5. Importantly there does not appear to be an up to date Strategic Housing Market Assessment with the Housing Needs Survey being dated 2015 with an update in 2016. The Economic Forecasts and Housing Needs Assessment does not consider housing mix. The Housing needs survey summary 2019 (ARC4) only appears to deal with the total affordable need and size of affordable dwellings, in terms of number of bedrooms. Therefore there is a lack of evidence base for this policy approach. It is acknowledged that Appendix 4 summarises the findings of the housing need survey 2019, however the full study is not yet publicly available. Firsure reserve the right to comment further when this becomes available. 7.6. Although SHMA and Appendix 4 of the Plan, derived from the Housing Need Study 2019, considers the broad issues of housing mix, the Local Plan should not seek to control the housing mix, since it would mean that the market would be unable to adjust to changes in the market. Policy 8 seeks to specifically address the housing mix on sites. This aspect of the policy is onerous and prescriptive, particularly as it is seeking to control the size of units, mix and tenure. The policy should be amended to encourage or reflect, rather than require. 7.7. It is unclear from the Whole Plan Viability Study how the identified mix has been taken into account. An average size of dwelling of 92.90 has been assumed for the purposes of the testing. This appears to be based on a general assumption of 30% 2 bed dwellings 40 % 3 bed dwellings, and 30 % 4 bed dwellings. This does not align with the mix sought through the Local Plan, detailed in appendix 4 and derived from the housing needs study 2019. 7.8. Firsure recommend that a flexible approach is taken regarding housing mix, which recognises that the need and demand will vary from area to area and site to site, to ensure that the scheme is viable, and provides an appropriate mix for the location. There is a real need to create a housing market in Doncaster that will attract investors to Doncaster and provide an element of aspiration to ensure working people and families are retained within the area. The evidence presented in the plan is time limited, and only identifies current deficits. Firsure has been unable to review the full findings of the Housing Needs Study 2019, and reserves the right for further comment in this regard. However, Firsure considers that the mix required by policy 8 has not been appropriately tested in terms of viability and considers Policy 8 Part A to be unsound. The policy should be amended to encourage to reflect the identified mix rather than require it. Affordable housing 7.9. Firsure is supportive of the need for affordable housing. The Framework is however clear that affordable housing policies must not only take account of need but also viability. Paragraph 34 of the Framework (2019) established the importance of viability to ensure that development identified in the Plan should not be subject to such a scale of obligations and policy burden that their ability to be delivered might be threatened. 7.10. The updated viability (2019), builds upon the earlier assessment and updates it in line with the emerging policies and the revised Framework. The assessment continues to identify three market value areas (low, medium and high) within Doncaster. 7.11. Tables 3-14 of the 2016 Viability Report show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support any level of affordable housing, whilst a number of schemes in the medium value areas would also struggle to provide the 15 percent required by this policy. 7.12. The 2016 Viability report previously concluded that sites located within high value areas are comfortably viable with the Councils proposed affordable housing provision of 25%, together with draft S106 policies. However for sites within medium to low value areas it was noted that the viability pressure was greater, and a reduced requirement should be adopted. 7.13. The 2019 Whole Plan Viability Study assesses the impact of the Plan requirements. Appendices 3 to 10 of the 2019 Whole Plan Viability Study demonstrate viability issues for a number of site typologies, including all typologies in low value areas. Typologies in low value areas were unviable when tested against the base assumptions. The study concluded that in high and medium value areas site typologies were comfortably viable. However, there are some circumstances were there are viability pressures in medium value areas, significantly the additional policy costs and sensitivities were tested against the study's base assumptions which notably included 15% affordable housing and not 23% sought by Policy 8. 7.14. Firsure are concerned that there is little evidence to support an affordable housing target of 15% in low value areas. Firsure consider that further viability evidence is required to support the target of 23% in combination with the policy requirements of the plan, including, mix, housing design standards, and density. Further there is limited justification in the Plan or associated evidence for a target of 23% affordable housing. The explanatory text states that the current need for affordable housing represents 23% of the Local Plan requirement for housing. Paragraph 6.9 states that this does not take into account current completions or viability. 7.15. Firsure is concerned that with all the policy requirements the Local Plan details this could undermine the provision of affordable housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is appropriately tested to ensure the sites identified and allocated are deliverable. 7.16. 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. Adaptable and Accessible Homes 7.17. Part D of the policy states that new development should aim to include the provision of homes which are adaptable, accessible and suitable for people with a wide range of needs. Firsure supports the adaptation of the existing stock and encouraging the provision of adaptable, accessible homes. However, as explained in response to Policy 46 Firsure object and does not consider it appropriate to require all developments to include this provision. Custom and Self Build Homes 7.18. Firsure understands the need and supports the delivery of Self-Build and Custom Build housing. Firsure understands the idea of increasing the self-build and custom build sector for its potential contribution to the overall housing supply. 7.19. Firsure consider that further evidence should be provided in respect of the level of demand in Doncaster for self and custom build and the nature of demand, including, whether those wanting to self-build would actually consider building within a larger housing development. As it stands paragraph 6.3 of the Plan provides very little explanation or evidence to support the policy. 7.20. Firsure consider that the requirements in Policy 8 are not justified and do not provide an appropriate strategy. Firsure consider that Policy 8 along with other policy requirements within the Plan could threaten the deliverability of the Plan. The Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 7.21. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 7.22. However, Firsure consider that with increased flexibility in Part A, revised affordable housing targets, and increased flexibility in the approach to self-build and self build alongside robust evidence supporting the requirements the Local Plan can be found sound. Firsure will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 7.23. To overcome the objection and address soundness matters, the Council should: - Policy 8 Part A should be amended to so that developers are encouraged to reflect the identified mix on schemes rather than require it”. - Review the approach to affordable housing to ensure it reflects the new Framework (2019) and that the evidence base and viability approach is robust and credible. - Include a flexible approach on accessible and adaptable homes and ensure the evidence base is robust and credible. - Include a flexible approach on custom build and self-build homes and ensure the evidence base is robust and credible.

Summary:
Firsure is concerned with a number of approaches and criteria established within Policy 8. Housing Mix There is a lack of evidence base for this policy approach which is not based on an up to date Strategic Housing Market Assessment with the Housing Needs Survey being dated 2015 with an update in 2016. Policy 8 seeks to specifically address the housing mix on sites. This aspect of the policy is onerous and prescriptive, particularly as it is seeking to control the size of units, mix and tenure. The policy should be amended to encourage or reflect, rather than require. It is unclear from the Whole Plan Viability Study how the identified mix has been taken into account. An average size of dwelling of 92.90 has been assumed for the purposes of the testing. This appears to be based on a general assumption of 30% 2 bed dwellings 40 % 3 bed dwellings, and 30 % 4 bed dwellings. This does not align with the mix sought through the Local Plan, detailed in appendix 4 and derived from the housing needs study 2019. Firsure recommend that a flexible approach is taken regarding housing mix, which recognises that the need and demand will vary from area to area and site to site, to ensure that the scheme is viable, and provides an appropriate mix for the location. Firsure considers that the mix required by policy 8 has not been appropriately tested in terms of viability and considers Policy 8 Part A to be unsound. Affordable housing The 2016 Viability report previously concluded that sites located within high value areas are comfortably viable with the Councils proposed affordable housing provision of 25%, together with draft S106 policies. However for sites within medium to low value areas it was noted that the viability pressure was greater, and a reduced requirement should be adopted. The 2019 Whole Plan Viability Study assesses the impact of the Plan requirements. Typologies in low value areas were unviable when tested against the base assumptions. The study concluded that in high and medium value areas site typologies were comfortably viable. However, there are some circumstances were there are viability pressures in medium value areas, significantly the additional policy costs and sensitivities were tested against the study’s base assumptions which notably included 15% affordable housing and not 23% sought by Policy 8. Firsure are concerned that there is little evidence to support an affordable housing target of 15% in low value areas. Firsure consider that further viability evidence is required to support the target of 23% in combination with the policy requirements of the plan, including, mix, housing design standards, and density. Further there is limited justification in the Plan or associated evidence for a target of 23% affordable housing. The explanatory text states that the current need for affordable housing represents 23% of the Local Plan requirement for housing. Paragraph 6.9 states that this does not take into account current completions or viability. Firsure is concerned that with all the policy requirements the Local Plan details this could undermine the provision of affordable housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is appropriately tested to ensure the sites identified and allocated are deliverable. 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. Adaptable and Accessible Homes Part D of the policy states that new development should aim to include the provision of homes which are adaptable, accessible and suitable for people with a wide range of needs. Firsure supports the adaptation of the existing stock and encouraging the provision of adaptable, accessible homes. However, as explained in response to Policy 46 Firsure object and does not consider it appropriate to require all developments to include this provision. Custom and Self Build Homes Further evidence should be provided in respect of the level of demand in Doncaster for self and custom build and the nature of demand, including, whether those wanting to self-build would actually consider building within a larger housing development. As it stands paragraph 6.3 of the Plan provides very little explanation or evidence to support the policy. The requirements in Policy 8 are not justified and do not provide an appropriate strategy. Policy 8, along with other policy requirements within the Plan, could threaten the deliverability of the Plan. The Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. However, Firsure consider that with increased flexibility in Part A, revised affordable housing targets, and increased flexibility in the approach on custom and self-build alongside robust evidence supporting the requirements the Local Plan can be found sound. Firsure will continue to work with the Council to develop appropriate modifications to the Local Plan. To overcome the objection and address soundness matters, the Council should: - Amend Policy 8 Part A so that developers are encouraged to reflect the identified mix on schemes rather than require it”. - Review the approach to affordable housing to ensure it reflects the new Framework (2019) and that the evidence base and viability approach is robust and credible. - Include a flexible approach on accessible and adaptable homes and ensure the evidence base is robust and credible. - Include a flexible approach on custom build and self-build homes and ensure the evidence base is robust and credible.
The viability testing considers a number of different viability scenarios. This includes the 'base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost' developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in. NPPF is clear in the support for custom and self build housing and the Council maintains a Register of any such interest and the policy seeks to 'encourage' such opportunities and is not mandatory.
5.1. Policy 8 seeks to ensure the right range, type, size and tenure of homes are delivered within Doncaster. Metroland is concerned with some aspects of this policy, and the robustness of the whole plan viability. Metroland therefore consider that the Policy 8 is unsound. Test of Soundness 5.2. Metroland considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification

5.3. Metroland is concerned with a number of approaches and criteria established within Policy 8. Housing Mix 5.4. Metroland is supportive of the principle of providing a broad mix of housing. However the Local Plan should not dictate housing mix across the borough. The Local Plan should achieve this housing mix through identifying the level of provision and the broad distribution of new housing. 5.5. Importantly there does not appear to be an up to date Strategic Housing Market Assessment with the Housing Needs Survey being dated 2015 with an update in 2016. The Economic Forecasts and Housing Needs Assessment does not consider housing mix. The Housing needs survey summary 2019 (ARCA) only appears to deal with the total affordable need and size of affordable dwellings, in terms of number of bedrooms. Therefore there is a lack of evidence base for this policy approach. It is acknowledged that Appendix 4 summarises the findings of the housing need survey 2019, however the full study is not publically available. Metroland reserve the right to comment further when this becomes available. 5.6. Although SHMA and Appendix 4 of the Plan, derived from the Housing Need Study 2019, considers the broad issues of housing mix, the Local Plan should not seek to control the housing mix, since it would mean that the market would be unable to adjust to changes in the market. Policy 8 seeks to specifically address the housing mix on sites. This aspect of the policy is onerous and prescriptive, particularly as it is seeking to control the size of units, mix and tenure. The policy should be amended to encourage or reflect, rather than require. 5.7. It is unclear from the Whole Plan Viability Study how the identified mix has been taken into account. An average size of dwelling of 92.90 has been assumed for the purposes of the testing. 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However, Metroland considers that the mix required by policy 8 has not been appropriately tested in terms of viability and considers Policy 8 Part A to be unsound. The policy should be amended to encourage to reflect the identified mix rather than require it. Affordable housing 5.9. Metroland is supportive of the need for affordable housing. The Framework is however clear that affordable housing policies must not only take account of need but also viability. Paragraph 34 of the Framework (2019) established the importance of viability to ensure that development identified in the Plan should not be subject to such a scale of obligations and policy burden that their ability to be delivered might be threatened. 5.10. The updated viability (2019), builds upon the earlier assessment and updates it in line with the emerging policies and the revised Framework. The assessment continues to identify three market value areas (low, medium and high) within Doncaster. 5.11. 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Appendices 3 to 10 of the 2019 Whole Plan Viability Study demonstrate viability issues for a number of site typologies, including all typologies in low value areas. Typologies in low value areas were unviable when tested against the base assumptions. The study concluded that in high and medium value areas site typologies were comfortably viable. However, there are some circumstances where there are viability pressures in medium value areas, significantly the additional policy costs and sensitivities were tested against the study’s base assumptions which notably included 15% affordable housing and not 23% sought by Policy 8. 5.14. Metroland are concerned that there is little evidence to support an affordable housing target of 15% in low value areas. Metroland consider that further viability evidence is required to support the target of 23% in combination with the policy requirements of the plan, including, mix, housing design standards, and density. 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This could impact on the delivery of
the housing target. Instead, the Council should ensure this policy is appropriately tested to ensure the sites identified and allocated are deliverable. 5.16. 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. Adaptable and Accessible Homes 5.17. Part D of the policy states that new development should aim to include the provision of homes which are adaptable, accessible and suitable for people with a wide range of needs. Metroland supports the adaptation of the existing stock and encouraging the provision of adaptable, accessible homes. However, as explained in response to Policy 46 Metroland object and does not consider it appropriate to require all developments to include this provision. Custom and Self Build Homes 5.18. Metroland understands the need and supports the delivery of Self-Build and Custom Build housing. Metroland understands the idea of increasing the self-build and custom build sector for its potential contribution to the overall housing supply. 5.19. Metroland consider that further evidence should be provided in respect of the level of demand in Doncaster for self and custom build and the nature of demand, including, whether those wanting to self-build would actually consider building within a larger housing development. As it stands paragraph 6.3 of the Plan provides very little explanation or evidence to support the policy. 5.20. Metroland consider that the requirements in Policy 8 are not justified and do not provide an appropriate strategy. Metroland consider that Policy 8 along with other policy requirements within the Plan could threaten the deliverability of the Plan. The Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 5.21. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 5.22. However, Metroland consider that with increased flexibility in Part A, revised affordable housing targets, and increased flexibility in the approach on custom and self build alongside robust evidence supporting the requirements the Local Plan can be found sound. Metroland will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 5.23. To overcome the objection and address soundness matters, the Council should: - Policy 8 Part A should be amended to so that developers are encouraged to reflect the identified mix on schemes rather than require it; - Revise the approach to affordable housing to ensure that the evidence base and viability is robust and credible; and - Include a flexible approach on custom build and self build homes and ensure that the evidence base is robust and credible.

Summary:

Policy 8 - Delivering the necessary range of housing. o SHMA and Housing needs study are out of date - evidence base needs updating. Housing Mix. 1. Lack of evidence for approach taken. 2. Local Plan should not seek to control the housing mix - to prescriptive. 3. This aspect of policy should 'encourage' rather than 'require'. 4. Flexible approach should be taken - need to vary rea to area. 5. Mix in Policy has not been appropriately viability tested. Affordable Housing. 1. Little evidence to support target of 15% in low value areas. 2. Little justification of the 23% target. 3. The need for regular viability assessment could undermine deliverability. 4. Unrealistic to negotiate each site on a one by one basis - could jeopardise delivery. 5. Policy needs to reflect NPPF 2019. Adaptable and Accessible Homes. 1. Re Part D 2. Support principles of policy but does not consider it appropriate to require all developments to include this provision. 3. Should be a more flexible approach, Custom and self-Build Homes 1. Further evidence needed of the level of demand. 2. Para 6.3 provides little explanation as to evidence to support the policy. 3. Should be a more flexible approach.

Response:

The viability testing considers a number of different viability scenarios. This includes the 'base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost' developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in. NPPF is clear in the support for custom and self build housing and the Council maintains a Register of any such interest and the policy seeks to 'encourage' such opportunities and is not mandatory.
Policy Framework (NPPF). It is a key opportunity to accelerate the delivery of housing, with the sector rapidly increasing over recent years in major cities and towns across the UK. The sector is afforded specific support in the NPPF. Paragraph 61 of the NPPF notes that planning policies should encourage a variety of housing tenure types, including rental homes, where there is a need. Indeed, DC’s Housing Need Assessment acknowledges there is a growing demand for the private rented sector, however not in the sense of new purpose build private rent. It is therefore considered the DLP should afford recognition and support to the sector, albeit this is currently not included within the emerging DLP. As such, Doncaster are also unable to apply a specific affordable housing policy to the BtR sector. The NPPF sets out guidance as to how Government expects BtR to be dealt with by the planning system. Paragraph 64 specifically singles out BtR homes as a housing sector that does not necessarily need to follow the usual affordable housing policy approach, given the economics of their developments are often challenging. Authorities are required to consider whether these is a need for BtR in their area, and if so, to bring forward a local plan policy that sets out their approach to promoting and accommodating BtR schemes. Given the continuing strong performance and growth in this sector across all major cities and towns, it is evident this sector needs to be addressed within the DLP. Indeed, BtR schemes are currently being delivered in Doncaster (i.e. by Keepmoat on delivering BtR at Carr Lodge). Furthermore, our client’s interest in delivering BtR on their Site at Watch House Lane further demonstrates the market interest in this sector within Doncaster. Delivering affordable housing in BtR in the same manner as traditional market will frustrate the delivery of investment and new homes in a growing sector of the market. It is not realistic or viable to expect a single managed rental product to comply with a requirement for affordable housing that is designed to work with traditional housing market. As such, it is not appropriate to apply a blanket requirement for the provision of affordable housing. It is therefore not clear how Doncaster proposed to address affordable housing for BtR schemes that will inevitably be coming forward within the Borough. The Policy is therefore not supported by sufficient evidence base and is not consistent with national policy. The DLP should warrant BtR specific recognition, acknowledging and supporting this as a housing sector that will help provide the delivery of new homes. If Doncaster wish to implement a specific affordable housing policy for the BtR sector, further evidence will be required to support this. CONCLUSION: However, in relation to the draft policies listed below, the DLP as currently drafted is not justified and unsound. To make the plan sound, the following amendments noted above are required. Policy: Policy 8 Topic: Affordable Housing Requested Change: The DLP should warrant BtR specific recognition, whilst a specific policy approach for BtR should be provided, addressing how DC intents to address affordable housing for BtR schemes.

Summary:
The Local Plan should include a specific policy approach for Build to Rent (BtR) scheme to establish how it supports affordable housing for Build to Rent schemes. BtR is increasingly recognised as the format for housing of choice for many people and is recognised within the Government’s Housing White Paper and the NPPF, paragraph 61. Doncaster’s Housing Need Assessment acknowledges there is a growing demand for the private rented sector, however not in the sense of new purpose build private rent. BtR schemes are currently being delivered in Doncaster (i.e. by Keepmoat on delivering BtR at Carr Lodge). A site at Watch House Lane should be allocated to deliver BtR. Delivering affordable housing in BtR in the same manner as traditional market will frustrate the delivery of investment and new homes in a growing sector of the market. It is not realistic or viable to expect a single managed rental product to comply with a requirement for affordable housing that is designed to work with traditional housing market. As such, it is not appropriate to apply a blanket requirement for the provision of affordable housing. It is therefore not clear how Doncaster proposes to address affordable housing for BtR schemes that will inevitably be coming forward within the Borough. Policy 8 is therefore not supported by sufficient evidence base and is not consistent with national policy.

Response:
The site that the Representation refers to has not previously been put to the Council for consideration as an allocation in the local plan. The site is designated as Residential Policy Area which supports the principle of all forms of residential uses, including Build-to-Rent. It is not considered necessary that a separate policy is drafted to specifically relate to such a model.
NaCSBA’s mission is to substantially increase the number of people able to build or commission their own home and they believe that opportunities should arise for prospective self and custom-builders through the Local Plan process. Custom & Self-Build Current custom and self-build (CSB) policy in England has evolved over the last 5 years with the Self-build and Custom Housebuilding Bill, receiving Royal Assent on 26 March 2015. The Bill is now an Act of Parliament. This Bill seeks to establish a register of prospective custom builders who are seeking a suitable serviced plot of land and requires LPAs to keep an up to date register of people within the district that wish to build their own home. NaCSBA are pleased to note that Doncaster Council do keep a self-build register which prospective self-builders can sign up to via the council’s website. The Right to Build legislation clearly demonstrates how the government intends for LPAs to respond to the requirements set out in the NPPF when drawing up new Local Plans. LPAs should take a proactive position to providing land and should undertake rigorous and effective evidence gathering to measure custom and self-build need in their districts. And LPAs that do not do so can expect their Local Plans to be found unsound at examination. The Housing and Planning Act 2016 conferred on LPAs the responsibility to: “Give suitable development permission in respect of enough serviced plots of land to meet the demand for self-build and custom house building in the authority's area?” The Act established that evidence of such demand would be provided by registers which LPAs are required to keep in accordance with the 2015 Self-Build and Custom Housebuilding Act. Paragraph 61 of the revised National Planning Policy Framework (NPPF) sets out the requirement for Local Planning Authorities (LPA) to plan for a wide choice of high quality homes to support sustainable communities and provide greater opportunities for home ownership. It goes on to state: “The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).” Furthermore, the NPPF makes clear how small and medium sized sites can make an important contribution to meeting the housing requirement of an area. The identification and promotion of small and medium sites as per the NPPF paragraph 61 can be promoted in order to support the needs of custom and self-builders. Recent appeal decisions such as a proposal for the erection of up to 5 self-build dwellings at The Meadows, Bromsberrow Heath, Ledbury (APP/P1615/W/18/3213122) have highlighted and confirmed the weight that should be afforded to self-build as a material consideration in determining planning applications, which in turn demonstrates the importance of CSB in housing delivery. As a consequence of the policy and guidance outlined above, it seems clear that LPAs have a duty conferred upon them to actively meet the needs of those wishing to build their own homes. CSB in the Doncaster Local Plan Whilst NaCSBA are pleased to note that the Local Plan review does contain reference to self-build, it is concerned that the provisions set out in Policy 8 and Policy 70 do not discharge the LPA’s duties towards meeting the needs of those that wish to build their own home. Policy 70 promises the delivery of 0.4ha worth of land to be made available for self-build plots. At 40 dwellings per hectare this policy will ensure the delivery of just 16 self-build units or less than one a year over the plan period. Policy 8 pays lip-service to paragraph 61 of the NPPF by stating that the LPA will ‘encourage’ the provision of opportunities to accommodate custom build and self-build homes ‘on housing allocations and elsewhere’, but it does not set out the manner in which this will be achieved. In reality, the policy does not give certainty that any additional service self-build plots will be delivered over and above the 16 units promised by Policy 70. In order to meet the requirements, set out by national policy, it is important that the Local Plan is proactive and progressive in this area. It is not considered sufficient to simply include a policy that simply states that the LPA will ‘encourage’ delivery of building plots for custom and self-build. Instead, in order for the plan to be considered to be Positively prepared and Consistent with national policy it must demonstrate specifically and in some detail how it will ensure that the needs of custom and self-builders are to be met. PROPOSED CHANGE Recommendations There are a number a different policy mechanisms that could be employed to ensure a steady and sufficient provision of CSB opportunities within the borough, which would mean that the plan could be considered to meet needs of those wishing to build their own home, including: - Setting a requirement of, for example, 5% of units on large sites to be delivered as serviced self-build plots. In the case of oversupply a clause could be included stating that plots that are not sold within a certain timeframe (6-12 moths) can be built out by the developer - Allocating further small and medium-scale sites within the Plan specifically for custom and self-build to deliver a greater number of units than 16. - Allowing custom and self-build units outside, but adjacent to, settlement boundaries where the site is sustainable and does not represent an incursion into the open countryside. Particularly where the proposal would result in the ‘rounding off’ of the developed form of the settlement and the applicant is on the self-build register. It is considered that in order for the plan to be considered Positively prepared and Consistent with national policy at examination, it will be necessary to include at least two of the above recommendations in order to demonstrate that the delivery of self-build opportunities can meet the demand of those wishing to build their own home.
Summary:

Self-build and Custom Build. The Housing and Planning Act 2016 says that LPA should give suitable development permission to meet the demand for Self-Build and Custom build. Policy 8 and Policy 70 do not discharge the LPA duties towards meeting the need. Policy 70 (Unity Regeneration project) only equates to 16 self-build plots over the plan period. Policy 8 - Delivering the necessary range of housing. Pays 'lip service' only to NPPF para. 61. Does not set out how it will be achieved. No certainty that any plots will be delivered. Needs to be specific detail in the policy. Policy 8 - Recommendations: 1. Set out a requirement for self-build plots in the policy - e.g. 5% 2. Allocate further small and medium sized sites specifically for self-build. 3. Allow some self-build units outside but adjacent to settlement boundaries (where sustainable and not an incursion into the countryside) Policy 70 - Unity Policy 70 (Unity Regeneration project) only equates to 16 self-build plots over the plan

Response:

The Self and Custom Build Register. Following the publication of the relevant legislation in 2016, Doncaster Council has been inviting interest for custom and self-build housing (both individuals and groups) and maintaining a register of any such interest. As at November 2019 there are 21 entries on the Register, all individuals. The Council also maintains and publishes the Brownfield land Register that records plots of previously developed land suitable for housing development. This is published on our website and is updated annually. Provision of land and permissions. The Carr Lodge, Woodfield site (Ref.13/00073/REM) includes a large area (1.5ha) of serviced land specifically for self-build homes alongside a supporting design code for their development. This plot of land (at average density rates) should support approximately 45 homes. Also, the large mixed use Unity site as mentioned in the representation (15/01300/OUTA) has at least 0.4 hectares of land made available for the development of self-build plots. This equates to approximately 12 homes. The demand raised by the Self Build register will be monitored and an appropriate response to that demand will be provided. No change to Policy 8 is proposed at this stage.
3.45. We generally agree with Draft Policy 8 regarding the range of housing, in respect of type, size and tenure. A key aim of DMBC is to boost the supply of new housing with the need to diversity local housing markets to offer a range of house types and sizes to deliver more mixed and inclusive communities. The housing mix will of course need to reflect the population and population projections. A diverse range of housing will be required to meet population and household growth which will need to include smaller dwellings as well as those suitable for elderly living. Yet the type of housing should also reflect the ambition for Doncaster to include larger homes for families as well as starter homes so the younger generations are able to stay within the district. 3.47. To be able to determine the exact housing mix suitable for Doncaster there must be extensive evidence produced to substantiate the ratio of housing laid out in the Local Plan. In Doncaster the main item of evidence in this instance is the Doncaster Housing Need Assessment 2015. Therefore the most recent HNA produced by DMBC was back in 2015 and therefore an updated evidence base for housing need should be produced in the interests of an up to date evidence base in accordance with paragraph 60 of the NPPF. 3.48. The draft affordable housing targets are split depending on the market area of the site, with 23% affordable homes in the Borough's high value housing market areas and 15% elsewhere. 3.49. We would point out that the final affordable housing contributions, whilst typologies should be employed at the early stage to better build in viability at an early stage, affordable housing should ultimately be able to be negotiated through viability assessments where required to account for site abnormals and market changes. 3.50. The Grange Farm Urban Extension will offer a range of house types to reflect the housing need within the district with the aim to provide different house types, number of bedrooms and tenure. Recommendation 7: DMBC should review its housing need so to provide an up to date assessment to make sure the evidence is up to date in the interests of justified and effective plan making.

Summary:
Generally agree with Policy 8 re: the range of housing in respect of type, size and tenure. Housing mix will need to reflect population and population projections. A diverse range is required including smaller dwellings and housing for older people. But it should include larger family homes and starter homes for younger generations to stay local. To understand the exact housing mix there should be extensive evidence produced to substantiate the ratio laid out in the Local Plan. The most recent HNA is 2015 and need updating in accordance with para. 60 of the NPPF. The affordable housing amounts should ultimately be able to be negotiated through viability assessments where issues can be taken into consideration. Grange Far, will provide a range of house types to reflect housing needs in the district - including types, bedrooms and tenures. Recommendation 7: DMBC should review its housing need so to provide an up to date assessment to make sure the evidence is up to date in the interests of justified and effective plan making.

Response:
Although the full version of the Assessment was not published at the time of Publication, a 2019 Housing Needs Study has now been published and the appendix in the local plan on dwelling mix and type was included (Appendix 4) and therefore up-to-date evidence being 2019. The affordable housing requirements have been tested for viability and Policy 67 deals with any resultant need for site specific appraisals albeit the government's intention is that these should not now be the norm.
Comment Ref: C/Policy 8/05289/1/006
Attend Examination: Attend Hearing
Reason: We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Area: Chapter 6: Meeting the Need for New Homes
Policy: Policy 8: Delivering the Necessary Range of Housing

Tests of Soundness: Positively prepared

Comment:
The affordable housing requirements set out in this policy are not based upon robust evidence. It is therefore not justified and unsound. The requirement of 15% affordable housing on site in areas of low value does not reflect the evidence provided in the Whole Plan Viability Study. The study states that "Viability pressure is at its highest in low value locations. Viable schemes are shown for Greenfield sites with a 15% affordable housing provision, however, this is on the basis that all affordable housing is provided as affordable home ownership tenures and S. 106 obligation costs are reduced to #3,359 per dwelling - half of the baseline testing. Brownfield variations generally return unviable outcomes even with the aforementioned adjustments. The policy is ignoring signals from the evidence which is clear that providing 15% affordable housing in low cost areas will prevent sites from being viable. The policy is unsound as it is not based upon robust evidence and because it is also not positively prepared or consistent with national policy when assessed against the NPPF (paragraph 16) which states that plans should be prepared in a way that is aspirational but deliverable.

Summary:
The affordable housing requirements set out in Policy 8 are not based upon robust evidence and is ignoring signals in the Whole Plan Viability Study which is clear that providing 15% affordable housing in low cost areas will prevent sites from being viable. Viable schemes are shown for Greenfield sites with a 15% affordable housing provision. However, this is on the basis that all affordable housing is provided as affordable home ownership tenures and S. 106 obligation costs are reduced to #3,359 per dwelling - half of the baseline testing. Brownfield variations generally return unviable outcomes even with the aforementioned adjustments.

Response:
The viability testing considers a number of different viability scenarios. This includes the 'base? appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost? developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in.
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**Comment Ref:** C/Policy 8/05290/1/006  
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**Area:**  
Chapter 6: Meeting the Need for New Homes  
**Policy:** Policy 8: Delivering the Necessary Range of Housing

**Tests of Soundness:**  
- Positively prepared  
- Justified  
- Consistent with national

**Comment:**  
The affordable housing requirements set out in this policy are not based upon robust evidence. It is therefore not justified and unsound. The requirement of 15% affordable housing on site in areas of low value does not reflect the evidence provided in the Whole Plan Viability Study. The study states that 'Viability pressure is at its highest in low value locations. Viable schemes are shown for Greenfield sites with a 15% affordable housing provision, however, this is on the basis that all affordable housing is provided as affordable home ownership tenures and S. 106 obligation costs are reduced to #3,359 per dwelling - half of the baseline testing. Brownfield variations generally return unviable outcomes even with the aforementioned adjustments. The policy is ignoring signals from the evidence which is clear that providing 15% affordable housing in low cost areas will prevent sites from being viable. The policy is unsound as it is not based upon robust evidence and because it is also not positively prepared or consistent with national policy when assessed against the NPPF (paragraph 16) which states that plans should be prepared in a way that is aspirational but deliverable.

**Summary:**  
The affordable housing requirements set out in Policy 8 are not based upon robust evidence and is ignoring signals in the Whole Plan Viability Study which is clear that providing 15% affordable housing in low cost areas will prevent sites from being viable. Viable schemes are shown for Greenfield sites with a 15% affordable housing provision. However, this is on the basis that all affordable housing is provided as affordable home ownership tenures and S. 106 obligation costs are reduced to #3,359 per dwelling - half of the baseline testing. Brownfield variations generally return unviable outcomes even with the aforementioned adjustments.

**Response:**  
The viability testing considers a number of different viability scenarios. This includes the 'base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost' developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in.
Chapter 6: Meeting the Need for New Homes

Policy 8: Delivering the Necessary Range of Housing

Tests of Soundness:

Consistent with national

Comment:

Policy 8 states that the delivery of a wider range and mix of housing types, sizes and tenures will be supported through a number of measures including the requirement for inter alia A) a mix of house size, type, price and tenure to address needs and market demand as appropriate; B) affordable housing with varying levels for 'high value areas' (23%) or 15% 'elsewhere'. The ratio between affordable homes for rent and low-cost home ownership is set at 75%/25%. Paragraph 6.10. refers to the 2019 Viability Testing Update which modelled a number of actual Local Plan allocations. The conclusion of this update was that development sites in the Borough's high and medium value areas are generally viable with a 23% affordable housing requirement when considered in conjunction with other Local Plan policy requirements. Whilst the broad approach of differentiating the affordable requirement between high and low-cost areas is appreciated, the explanatory text at paragraph 6.10 accepts that this is a general approach and cannot therefore be robust for every site. It is therefore important that the Plan recognises the potential need for viability assessment on a site by site basis in line with paragraphs 57 and 122 of the NPPF. Objection is therefore made to Policy 8 B) which should be amended to read: "Policy 8: Delivering the Necessary Range of Housing (Strategic Policy) The delivery of a wider range and mix of housing types, sizes and tenures will be supported through the following measures: A) a mix of house size, type, price and tenure to address needs and market demand as appropriate; B) there is a clear requirement for the provision of affordable housing to meet local needs in each individual community. Housing sites of 15 or more homes (or 0.5 Ha or above) will, subject to viability, normally be expected to include 23% affordable homes in the Borough's high value housing market areas (as defined in explanatory text below), or a lower requirement of 15% elsewhere in the Borough (including starter homes / discounted market sales housing which meet the definition in the NPPF) on-site. Proposals for affordable housing on developments of less than 15 units will be supported where these meet other development plan policies." And the following supporting paragraphs amended to read: "6.9. Affordable homes can be social rented, affordable rented, intermediate, starter and discounted market sales homes providing homes to eligible households whose needs are not met by the market. The 2019 Housing Need Study identified that overall, 209 affordable units are required per year over and above the Council's own build programmes, which equates to 23% of the Borough's housing target. However, this assessment does not factor in what levels of affordable housing have been secured already through commitments as it is just a percentage of the annual housing target of 920 net new homes. Nor does it consider whether the target is appropriate to adopt as a policy requirement as it takes no account of viability where national policy is clear that whatever requirement set through policy must be justified in terms of whole plan viability. 6.10. The Doncaster Local Plan Viability Testing (2016) evidence base assessed a series of hypothetical housing sites across the Borough's housing market areas in line with national policy and the best practice guidance. The 2019 Viability Testing Update to this evidence also revised the typologies before modelling a number of actual Local Plan allocations. The conclusion being that development sites in the Borough's high and medium value areas are generally viable with a 23% affordable housing requirement when considered in conjunction with other Local Plan policy asks. However, sites within the Borough's low value areas come under greater viability pressure. The evidence therefore recommends that it is more appropriate to adopt a reduced affordable housing requirement of 15% in these parts of the Borough. Appendix 5 identifies the Borough's two affordable housing requirement policy areas for the purposes of this policy. Notwithstanding this, the general affordable housing requirements sought on this basis will be subject to viability on a site by site basis. As the ratio of affordable homes for rent and low-cost home ownership can also impact on the viability of a development, this will also be subject to viability testing." Reason: In order to ensure viable delivery and be compliant with national policy.

Summary:

Policy 8 - Delivering the necessary range of housing. o Sites should be subject to viability on a site by site basis, o Part 'B' of the Policy and supporting paragraphs 6.9 and 6.10 should be amended to ensure viable delivery and compliance with NPPF. Representation includes suggested rewording of Part B and paragraph 6.9.

Response:

The Government's clear that the need for viability appraisals on a site-by-site basis should become less of the norm in the future with an up-to-date local plan that has been tested at plan-making stage. Notwithstanding this, Policy 67: Development Viability does allow for such where genuinely necessary.
Policy 8: Delivering the Necessary Range of Housing  
1. There is no specific mention within the policy itself of the affordable housing requirement being subject to viability testing. Object to the policy as currently drafted on the grounds that it is not in accordance with the Framework.  
2. Reference should be made to Policy 67 (development viability) to ensure clarity in the application of this policy (8)

Response:
Support for the principle of the policy welcomed. It is not considered that there needs to be cross-reference to Policy 67: Development Viability as the introduction to the Local plan itself at para 1.14 is explicitly clear that all the policies should be read together and that individual policies do not necessarily refer to other relevant policies.
Tests of Soundness:

Comment:

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: 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.

Summary:

Policy 8 Affordable Housing.  o Affordable housing figure must not only take account of need but also viability.  o 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.  o The Council should be mindful that it is unrealistic to negotiate every site on a one by one basis.  o This will jeopardise housing delivery.

Response:

The affordable housing ask is a viability-led target rather than being a solely needs-led requirement which reflects NPPF’s emphasis on the need for policies to be viable. Changes to national policy and guidance is clear that there is a need to frontload viability at plan-making stage and the need for viability appraisals as part of decision-taking will then become less of the norm. The Local Plan still however includes a policy (Policy 67) in respect to viability and all policies in the plan should be read as a whole. The viability testing evidence base has been prepared in line with all the relevant guidance and this includes assessing a number of allocations as well as hypothetical sites. The viability testing considers a number of different viability scenarios. This includes the 'base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost' developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in.
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: 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.

Response:
It is not considered that the policy is overly prescriptive on such matters. Part A makes clear that mix/type/tenure/price should take account of the latest Needs Assessment or other robust evidence.
Comment: The majority of the "Homes and Settlement" Draft Proposal appears to concentrate on "how" the number of new homes required was determined along with "where and what quantity" DMBC propose to disperse this number throughout the Borough to meet varied demographic needs. However, Marr Parish believes that DMBC have omitted to robustly address our elderly population within this proposal. In the Local Plan Reports DMBC state: 'Like many parts of the country, Doncaster's population is aging, with the 2015 Housing Needs Assessment predicting that the number of older people is set to increase by 36% between 2015 and 2032, whilst younger age groups are predicted to slightly decrease. This brings social and economic challenges for the borough.' Currently the over 65 population accounts for 25% (75,600) of our 302,400 population but by 2032 this is expected to rise [an increase of almost 38,000] to 36% (113,148) of the 314,300. Marr Parish Meeting observes that this significant demographic group has not been properly addressed within the plan. Marr Parish Meeting cannot condone this oversight, DMBC has an opportunity to rectify this oversight by delivering much needed private residential retirement developments aimed specifically at the needs of an ageing population where housing design and the provision of on-site services and support are fully integrated. In doing so, it is our view that such developments will provide suitable choice of accommodation and allow the elderly population to plan their future needs. This would release existing housing stock across the Borough - particularly within the rural communities - enabling residential areas where property demand is high but availability is limited, to become accessible to a wide and diverse range of new residents. DMBC has based its target for new dwellings on the future needs of families and younger people. However, since the report states: ‘younger age groups are predicted to slightly decrease?’ the subsequent number of new houses apportioned to this age group appears skewed. We believe the future housing needs of the borough should be revised to better reflect the future changes in demographic age profiles. In view of the issues outlined above, Marr Parish believe that in its present format, the proposed Draft Local Plan, does not appear to be sufficiently robust and therefore is not "Fit for Purpose" as it does not meet the identified "Future Needs" of the Borough in this regard.

Summary:
Preparation of the Local Plan has omitted to robustly assess the needs of the Borough’s elderly population. The Council has an opportunity to rectify this oversight by delivering much needed private residential retirement developments aimed specifically at the needs of an ageing population where housing design and the provision of on-site services and support are fully integrated. In doing so such developments will provide suitable choice of accommodation and allow the elderly population to plan their future needs. This would release existing housing stock across the Borough - particularly within the rural communities - enabling residential areas where property demand is high but availability is limited, to become accessible to a wide and diverse range of new residents. The target for new dwellings has been based on the future needs of families and younger people. and should be revised to better reflect the future changes in demographic age profiles.

Response:
The housing target is not just based on the housing needs of younger people and families it is based on the need of the borough’s population and includes the need to ensure we are planning for the needs of an ageing population. Such matters are considered through the Housing Needs Study amongst other areas. Policies in the local plan look to secure new housing meets the needs of the borough’s population, for example the Housing Standards policy (Policy 46) and Policy 8 (Delivering the Necessary Range of Housing).
For several years, Doncaster has suffered from an oversupplied property market and a reducing volume of Homebuyers in a financial position to purchase. Marr Parish continues to recognise that if Doncaster is to flourish there could be a need for additional, sustainable housing stock but this must not be delivered "at all costs" or to the detriment of existing Rural Communities nor at the expense of Green Belt Land. However, as Doncaster has approx. 4,281 vacant houses around the Borough, Marr Parish Meeting would urge DMBC to use The National Policy Framework which places the obligation on Local Authorities with "compulsory purchase powers" to "bring back into residential use" vacant houses and disused buildings. Historically, DMBC have been reticent to pursue this obligation. Subsequently, for the new Plan to be considered "effective and sound" this must now be considered a priority within the new emerging Local Plan with a commitment from DMBC and a transparent Policy for Doncaster. We further believe that at 31% (as a minimum) of the 13,800 new homes that the "Homes and Settlements" document proposes, that this would deliver much needed Affordable/Social homes in the Borough without the need to take land out of Green Belt to build even more new homes when such properties currently exist. We urge DMBC to ascertain how much housing stock is currently vacant within the Borough before making a commitment to significant investment in developing new housing stock to meet any potential future demands. We advocate that this approach fully aligns to and delivers Affordable/ Starter homes with sustainability and in keeping with DMBC's green policies and obligations. Marr Parish note that in the draft Homes and Settlements proposal, the current total households for the Borough totals 130,165 and the draft still proposes an additional 13,800 new homes over the next 15 years. DMBC's latest proposals remain at 920 new dwellings per year, 585 to accommodate population rise within the borough and an additional 335 allocated for economic growth across the borough. DMBC project that 15,640 new dwellings will be required to meet demand over a 17 year period between 2017 - 2035. In previous consultations we raised concerns over the targeted increase and the number of projected new dwellings within the draft Local Plan. We understand the rationale and the basis on which this target has been established, however, our concerns still remain the same since this still constitutes an increase of +10% on the total available housing stock across the borough, a borough which has one of the worst performing housing markets in the UK. Marr Parish agree with DMBC's proposal to objectively evaluate and measure the number of new jobs and homes annually. We believe, plan delivery means they are co-dependent on one another and this must be implemented to ensure they achieve an equally balanced delivery for economic growth. Marr Parish Meeting welcome DMBC's aspirations to be a "greener" Doncaster and that the Draft Proposal will ensure that developers set aside 10% of land for "green spaces". We believe that this could have a positive influence on reducing obesity and improving health and wellbeing for the whole community. In every community, Parks and green spaces are important amenities, however due to restricted budgets DMBC have stated over the last few years that they have little/ no funding available to provide new or replacement play equipment. Instead play equipment has had to be sourced through grant funding applications, as is the case in point with Marr Park. We are not aware of evidence in support of DMBC's Chief Financial Officer recent statement '?. All of the unspent section 106 funding is earmarked for a range of developments including improving public open spaces which may include installing new play equipment and improving parks and woodland areas'? Contrary to this, Marr Parish has experienced a different scenario over play equipment being removed from its park but not replaced. With DMBC claiming they have no funds available to replace or install new equipment the only recourse left to us, is to instead, look to source the play equipment through grant funding application. As stated previously, Marr Parish agrees DMBC's aspirations to be a 'greener' Doncaster but based on historic evidence, we have little confidence in this ever being delivered or moving past an 'aspiration'.

Summary:
Greater consideration should be given to the use of vacant homes and use of compulsory purchase powers to secure their delivery, rather than the provision of new homes. This would aid delivery of Affordable/ Starter Homes without the need to take land out of the Green Belt. Support is given to Policy 29 requirement that 10% of land should be set-aside for green spaces as part of new development. However, based on experience that Doncaster Council has little/ no funding available to provide new or replacement play equipment, there is little confidence this policy can be delivered.

Response:
The Local Plan is just part of ensuring new homes are provided, alongside other Council Teams/ Strategies/ initiatives such as the Housing Strategy which includes looking at bringing back into effective use empty properties. Compulsory Purchase Orders also fall outside of the Local Plan remit. Policy 29 relates to open space provision in new developments and these are sites often brought forward by private landowners and developers as opposed to the Council. All relevant applications will need to comply with this policy when adopted.

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<td>Name:</td>
<td>Rhonda Job</td>
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<td>Marr Parish Council</td>
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The proposed Draft Plan did not provide an in-depth assessment or provide evidence to support the true need for Social housing. Social and Affordable housing were just "lumped in" within the annual projected target of 338 new homes required [which accounts for 37% of the total per annum] by the planned economic growth. It is Marr Parish Meetings view that Doncaster’s population has an increasing need for such housing which does not seem to be provided for nor is it prioritised within the Local Plan. This must be clarified, specific targets must be set to ensure that both developers and DMBC know what has to be delivered, in order to meet the future needs of the Borough. Marr Parish also note that Section 106 Agreements, which allows DMBC to get money from developers in exchange for granting planning permissions for projects, has amassed a total of £5.7 million. It is our understanding that this Section 106 money was collected for the sole purpose and its intended use was for it to be spent on the communities who would be directly affected by the new development projects in their area. This money has been collected and earmarked for affordable housing, improvements to public open spaces like play parks, as well as, the provision for new school places to address the expected uptake in population from families and residents purchasing new houses in these developments. We do not agree with the current policy, where this Section 106 money is accumulated to create a large fund, only then to be spent on a bigger project unrelated to the areas that have been impacted by new development. It is our understanding that this money was intended to be spent in areas where development has taken place and to off-set impacts of such development in those areas. It appears that this is not always the case. We further believe, at the outset of proposed development projects DMBC must have identified impacts and what these impacts would have on communities, hence, the request for contributions from developers towards addressing these, under Section 106 Agreements. We firmly believe that money collected from developers should benefit and be spent in the communities where development has taken place. Instead, it would appear that the majority of this 106 money is being 'accumulated' to provide finance for new affordable housing projects. This would suggest that DMBC is the only main beneficiary. Since, any new affordable houses will have been delivered through external finance and not from DMBC's own budget but it also means, that DMBC will boost its own income from additional rates, revenue gained from these new homes. We acknowledge that affordable housing is needed but we do not accept that it is reasonable for these to be delivered at the expense or detriment of other communities and the new Local Plan Policies should ensure that 106 money is spent in the communities impacted by the development.

Summary:
The Local Plan does not evidence the need for social housing and objects to its simple inclusion within the economic growth element of the housing requirement. S106 contribution should be directed to where the communities that would be directly affected by the new development projects in their areas and do not agree with current policy which accumulates s105 funds into a large fund to be spent on a bigger project unrelated to the areas that have been impacted by new development - it would appear that the majority of this 106 money is being 'accumulated' to provide finance for new affordable housing projects. It is acknowledged that affordable housing is needed but it is not accepted that it is reasonable for these to be delivered at the expense or detriment of other communities - and the new Local Plan Policies should ensure that 106 money is spent in the communities impacted by the development.

Response:
Policy 8 sets out the affordable housing requirement and the explanatory text provides further detail in that there is a need for 209 affordable units per annum over and above the Council's own build programme. The ratio between affordable homes for rent and low cost home-ownership is 75%/25% respectively. Section 106 contributions must be taken in accordance with the legal and policy tests. Contributions are sometimes taken in lieu of direct provision and spent in accordance with agreed protocols e.g. the borough is largely a self contained housing market area which supports affordable housing being delivered in areas that may be different to where the contribution was secured. The policy is clear that such contributions will normally be expected to be delivered on site, but if commuted sums are taken then they will be used to target areas of need to assist with rebalancing the housing market. Part of the reasoning behind such an approach is, particularly in respect to affordable housing, commuted sums may not amount to sufficient funds to deliver affordable housing without being in conjunction with other development’s commuted sums.
Chapter 7 is unsound as it does not meet the needs of the Borough to address climate change; nor take account of the evidence about climate change or of changing travel demand. 1. Local planning authorities have a duty under Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) to ensure that plans ‘contribute to the mitigation of, and adaptation to, climate change’. The duty means that local plans should be based on evidence relating to the Climate Change Act targets (including identifying baseline carbon emissions data), and monitoring of plans in annual monitoring reports should demonstrate how development is contributing to meeting those targets. There is no evidence of this approach in Chapter 7, which makes no mention of climate change. Strategically planned major change, where the location and overall form of development can have a major impact on travel, must be set within a carbon pathway to net zero 2050 with binding carbon targets for all modes.

2. During development of this version of the Local Plan climate change has developed into an existential threat and emergency. The October 2018 Special Report from the Intergovernmental Panel on Climate Change (IPCC) concluded that in order for warming to stay below 1.5°C, human-caused CO2 emissions must fall to net zero by 2050 or earlier (note 1 - October 2018, [http://www.ipcc.ch/report/sr15/]) which will require ‘rapid and far reaching transitions’ that are ‘unprecedented in scale’ and imply deep emissions reductions in all sectors. The Committee on Climate Change (CCC) published its response to the IPCC’s report (note 2 - Net Zero The UK’s contribution to stopping global warming, Committee on Climate Change, May 2019), and in June 2019 the Government accepted the Committee’s advice and amended the 2050 target under the Climate Change Act to require net-zero greenhouse gas emissions by that date. 3. Transport is the one sector that has failed to meet its carbon budgets, with the sector’s emissions at the same level in 2016 as they were in 1990 (note 3 - 2016 UK Greenhouse Gas Emissions Final figures, BEIS, 2018, Table 6). Surface transport is the largest-emitting sector in the UK, accounting for 23% of UK emissions (note 4 - Net Zero Technical Report Committee on Climate Change, May 2019, Figure 5.1) with cars accounting for the majority of them. Even with a switch to electric vehicles, the level of reduced car mileage needed to meet the UK carbon budget by 2030 is estimated to be between 20% and 60%, depending on the speed of the switch to electric vehicles and how fast the electricity powering them is decarbonised (note 5 - More than electric cars, FoE, May 2019). It is therefore imperative that traffic reduction is implemented urgently. This will require a transformational change in the way people travel. The scale of the effort required has been shown by work done by the Tyndall Centre for both the West Yorkshire Combined Authority and Sheffield City Council (note 6 - [https://www.sheffield.gov.uk/content/dam/sheffield/docs/city-council/climate-change/Sheffield_Report_V1.3.1.pdf]). 4. In order to reduce road vehicle miles for both passengers and freight, demand management of road capacity is essential, coupled with investment in high quality, affordable and accessible alternatives. Research by CPRE - Appendix A attached - (The End of the Road? Challenging the road building consensus, 2017, Sloman et al) has reinforced the futility of providing further road capacity.

It not only induces substantial increases in traffic, over and above background growth, but also leads to congestion, air pollution and increases in carbon emissions. It reinforces a highly car-dependent pattern of land development, fails to benefit the economy and leads to long lasting adverse impacts on landscape and biodiversity. Travel demand is also reducing with 16% fewer trips than in 1996, 10% fewer miles travelled than in 2002 and 22 hours less hour travelling than a decade ago (note 7 - All Change? The Future of Travel and the Implications for Policy and Planning, The First Report of the Commission on Travel Demand, 2018). Therefore development proposals should be based on the Transport Hierarchy (note 8 - See Institution of Mechanical Engineers) which prioritises walking, cycling, public transport, taxi, pool car, private car in that order. Such an approach can change transport behaviour, improve people’s health, reduce levels of physical activity and sedentary behaviour, and reduce air pollution and congestion. Policy 13 is not set within a carbon reduction pathway to 2050, nor is there any reference to the impacts of changes on its proposals. All of the proposals listed in Policy 13A should be measured of last resort and only pursued if alternatives fail to provide the outcomes required. A1, A3, A4 - We are particularly concerned about the pan northern route, part of which would cross the Peak District National Park. The proposal is against all policy, both nationally and locally, on strategic (motorway and trunk) road infrastructure in a National Park (NPPF para 172 and footnote 54; PDNPA Core Strategy 2011 Policies T1 and T2 and para 15.9). Section 62 of the Environment Act 1995 places a general duty on statutory undertakers, such as Local Councils, to have regard to the purposes of National Parks when coming to decisions or carrying out their activities relating to or affecting land within the Parks. Although the Park is outside its area, Doncaster MBC has a duty under the Environment Act, which it has yet to demonstrate that it has in its decision to promote the pan-northern route across the National Park. Within South Yorkshire the pan-northern route and its components would have severe adverse impacts on some of the most sensitive landscapes, such as the Magnesian Limestone Ridge. A2 - The A1-A19 link road would be adjacent to a railway line with a station at Adwick-le-Street. This is a prime example of where all new development could be car-free and rely on rail/bus connections. A5 - Congestion on the A3(M) motorway (capacity improvements) should be managed using demand management and smart motorway techniques. A6 - The Hatfield Link Road may be essential to link strategic development to the road network but all residential development could be car free with connectivity based on the train station at Stainforth. A7 West Moor Link (A630); A8. Improvements to M18; A9. Improved access to Doncaster-Sheffield Airport from M18; A10. M18 / A1(M) interchange improvements; A11. North Nottinghamshire to A631 are all road capacity improvements. Traffic should be demand managed, coupled with development of high quality, accessible and affordable public transport. Some of these proposals (A1, A2, A3, A4, A5, A8, A10) fall within the scope of Transport for the North (TfN)’s Strategic Transport Plan 2019 Investment Programme (note 9 - [https://transportforthenorth.com/wp-content/uploads/TfN-final-investment-programme-19-20.pdf]) to 2050. TfN is
developing a carbon reduction pathway to net zero 2050 and has committed to amend its programme to meet this target (Strategic Transport Plan 2019, page 81). As TfN is the subnational transport body for the north and its remit covers Doncaster Borough, at least some of Doncaster’s proposals will be covered by the carbon reduction pathway. However, Doncaster should have its own pathway and make its own balances to achieve binding targets. PROPOSED CHANGE Insert as text before all policies a new opening to Chapter 7 Climate change is now an existential threat and emergency. In June 2019 the Government accepted the Committee on Climate Change’s advice and amended the 2050 target under the Climate Change Act to require net-zero greenhouse gas emissions by that date. Transport is the one sector that has failed to meet its carbon budgets, with the sector’s emissions at the same level in 2016 as they were in 1990 (note 10 - 2016 UK Greenhouse Gas Emissions Final figures, BEIS, 2018, Table 6). Surface transport is the largest-emitting sector in the UK, accounting for 23% of UK emissions (note 11 - Net Zero Technical Report Committee on Climate Change, May 2019, Figure 5.1) with cars accounting for the majority of them. Even with a shift to electric vehicles, the level of reduced car mileage needed to meet the UK carbon budget by 2030 is estimated to be between 20% and 60%, depending on the speed of the switch to electric vehicles and how fast the electricity powering them is decarbonised (note 12 - More than electric cars, FoE, May 2019). It is therefore imperative that traffic reduction is implemented urgently. This will require a transformational change in the way people travel. In order to reduce road vehicle miles for both passengers and freight, demand management of road capacity is essential, coupled with investment in high quality, affordable and accessible alternatives. The futility of increasing road capacity has been shown over many years through extensive research. It not only induces substantial increases in traffic, over and above background growth, but also leads to congestion, air pollution and increases in carbon emissions. It reinforces a highly car-dependent pattern of land development, does not benefit the economy and leads to long lasting adverse impacts on landscape and biodiversity. Therefore increasing road capacity will be an option of last resort and demand for it will be managed. The Transport Hierarchy (note 13 - https://www.imeche.org/policy-and-press/reports/detail/transport-hierarchy) which promotes walking, cycling, public transport and car sharing in that order of priority, in preference to single occupancy car use, for movement of people, and encourages efficient and sustainable freight, will be adopted for all planning and travel proposals in order to encourage more journeys to be made without a car. This would enable wider public policy goals for health and wellbeing, social inclusion, job opportunities, trade, access to services and sustainable places, which transport can support, to be achieved. The approach needs to be tailored to outcomes that are practical at the local level and to reflect particular areas of challenge such as travel in rural areas. (SEE EMAIL FOR IMAGE - Taken from National Transport Strategy, 2016 Transport Scotland, page 26) FURTHER PROPOSED CHANGES SHOWN UNDER EACH POLICY. Summary: Chapter 7 is unsound as it does not meet the needs of the borough to address climate change, nor does it take account of the evidence about climate change or changing travel demand. Local Planning Authorities have a duty under Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) to ensure that plans ‘contribute to the mitigation of, and adaptation to, climate change’. There is no evidence of this with Policy 7. The duty means Local Plans should be based on evidence relating to the Climate Change Act targets (including identifying baseline carbon emissions data), and annual monitoring reports should demonstrate how development is contributing to these targets. Airport proposals can only be supported in the context of the pathway to zero net emissions by 2050. This pathway should include domestic and international aviation emissions and a commitment to amend the programme of interventions to meet those targets. During the process of the Local Plan, climate change has developed into an existential threat and emergency. The government has set a target to reach zero net emissions by 2050. The DfT have (in their progress report on “Future of UK airports 2050” - note 3 - Reducing UK Emissions: 2019 Progress Report to Parliament, Committee on Climate Change July 2019) accepted that aviation emissions should be included in the Climate Change Act Targets and net zero carbon by 2050. Although the government does not have in place a framework for aviation carbon reduction, it clearly aims to develop one. Transport is the sector that has failed to meet its carbon budgets. Traffic reduction should be implemented immediately. This will require transformational change in how people travel. To reduce road vehicle miles for passengers and freight, demand management of road capacity is essential, coupled with investment in high quality, affordable and accessible alternatives. CPRE research shows that it is futile increasing road capacity as it increases traffic, congestion, air pollution and emissions - reinforcing car dependency, and fails to benefit the economy as well as leading to landscape and biodiversity impacts. Travel demand is reducing. Proposals should be based on the transport hierarchy of walking, cycling, public transport, taxi, pool car, private car in that order. Such an approach can change transport behaviour, improve people’s health, reduce levels of physical activity and sedentary behaviour, and reduce air pollution and congestion. All proposals in 13A should be last resorts pursued if alternatives fail to provide the required outcomes. Especially concerned about the pan northern route. The proposal is against all policy, both nationally and locally, on strategic (motorway and trunk) road infrastructure in a National Park (NPFP para 172 and footnote 54; PDNPA Core Strategy 2011 Policies T1 and T2 and para 15.9). 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Traffic should be demand managed, coupled with development of high quality and affordable public transport. Proposed changes: Insert as text before all policies a new opening to Chapter 7 Climate change is now an existential threat and emergency. In June 2019 the Government accepted the Committee on Climate Change’s advice and amended the 2050 target under the Climate Change Act to require net-zero greenhouse gas emissions by that date. Transport is the one sector that has failed to meet its carbon budgets, with the sector’s emissions at the same level in 2016 as they were in 1990 (note 10 - 2016 UK Greenhouse Gas Emissions Final figures, BEIS, 2018, Table 6). Surface transport is the largest-emitting sector in the UK, accounting for 23% of UK emissions (note 11 - Net Zero Technical Report Committee on Climate Change, May 2019, Figure 5.1) with cars accounting for the majority of them. 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It reinforces a highly car-dependent pattern of land development, does not benefit the economy and leads to long lasting adverse impacts on landscape and biodiversity. Therefore increasing road capacity will be an option of last resort and demand for it will be managed. The Transport Hierarchy (note 13 - https://www.imeche.org/policy-and-press/reports/detail/transport-hierarchy) which promotes walking, cycling, public transport and car sharing in that order of priority, in preference to single occupancy car use, for movement of people, and encourages efficient and sustainable freight, will...
be adopted for all planning and travel proposals in order to encourage more journeys to be made without a car. This would enable wider public policy goals for health and wellbeing, social inclusion, job opportunities, trade, access to services and sustainable places, which transport can support, to be achieved. The approach needs to be tailored to outcomes that are practical at the local level and to reflect particular areas of challenge such as travel in rural areas.

Response:
Climate change is a theme that runs through the whole plan and the plan is intended to be read as a whole. Policies in the chapter fully promote sustainable forms of travel such as walking and cycling. A Climate Change Topic Paper has been prepared for Submission stage.

CUSREF: 05043  Name: Mr John Seale  
Date: 29/09/2019  Organisation: 
Representing: 

Comment Ref: C/Vehicle Emissions/05043/1/001  
Attend Examination: Not Stated  
Reason: 
Area: Chapter 7: Transport, Access & Infrastructure  
Policy: Chapter 7: Transport, Access & Infrastructure  
Tests of Soundness: Positively prepared  

Comment: 
Plan is not sound because it appears the Council has no policy on vehicle emissions and the danger this poses to Public Health.

Summary: 
Plan not sound, has no policy on vehicle emissions and the danger they pose to public health.

Response: 
All policies in the plan need to be read as a whole as set out at para 1.14. Other policies deal with such matters, for example Policy 55: Pollution.
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| Comment: | Measures to help travel needs meet Doncaster’s carbon reduction pathway to net zero 2050 will be based on reducing the need to travel and widening travel choices, as follows:  
A) Patterns of development which reduce the need to travel and implement the sustainable transport hierarchy will be supported.  
B) Development must be supported by clear commitments to walking, cycling and public transport with mode-share targets in travel plans.  
C) Development must demonstrate best practices in sustainable transport, e.g. reducing travel through use of IT, Mobility as a Service (MaaS) and public transport, and promoting car clubs, cycle hire and home working solutions.  
D) Development will provide for car parking only in defined spaces or purpose-built bays on-street and be organised to avoid negative impacts on active travel and bus operation. The majority of car parking spaces will be communal (available to all residents, visitors and car club vehicles). Near to railway stations and strategic bus routes car-free development should be possible.  
E) Electric vehicle charging points will be provided.  
F) Development must make provision for public transport services that will operate 7 days a week and in the evenings from Day 1 of occupation. Provision of such services will be certain in the long term. The street layout will give priority to public transport over other traffic. Direct services to key destinations will be provided.  |
| Summary: | Measures to help travel needs meet Doncaster’s carbon reduction pathway to net zero 2050 will be based on reducing the need to travel and widening travel choices, as follows:  
A) Patterns of development which reduce the need to travel and implement the sustainable transport hierarchy will be supported.  
B) Development must be supported by clear commitments to walking, cycling and public transport with mode-share targets in travel plans.  
C) Development must demonstrate best practices in sustainable transport, e.g. reducing travel through use of IT, Mobility as a Service (MaaS) and public transport, and promoting car clubs, cycle hire and home working solutions.  
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E) Electric vehicle charging points will be provided.  
F) Development must make provision for public transport services that will operate 7 days a week and in the evenings from Day 1 of occupation. Provision of such services will be certain in the long term. The street layout will give priority to public transport over other traffic. Direct services to key destinations will be provided.  |
| Response: | It is not considered that this ‘new’ policy is necessary given the response to the Representation’s general comments on the chapter as set out above. |
Comment:
The Council support Policy 13: Strategic Transport Network specifically A) 11 which states that 'Proposals will be supported which: A) Improve key routes and connections to the Strategic Road Network and effectively manage traffic and relieve congestion, in particular at the following locations: 11. North Nottinghamshire to A631 capacity improvements.' Table 7 of the supporting text elaborates: 'Capacity improvements are required to improve access from North Nottinghamshire to Doncaster via the A631 in light of recent growth. Harworth and Bircotes, in Bassetlaw, has seen significant level of committed housing and employment development over recent years' through its continued regeneration. Concern has been raised by Doncaster Council that this development has, cumulatively, negatively impacted on the capacity of the existing highway network along the A631 between Tickhill and Bawtry - particularly the A631 Stripe Road Junction. Improvement schemes are recommended in Policy 13 along the A631 corridor to reduce congestion in the area. It is understood that the evidence for the capacity issues at the above locations is via transport assessments submitted as part of the planning applications for new development in the Harworth area. The Council consider that, for clarification, reference should be made to these statements in Table 7. It is the intention that the modelling work being undertaken to inform the Bassetlaw Transport Study Part 2 - a key part of the emerging Bassetlaw Local Plan evidence base - will help to identify specific capacity issues and potential mitigation measures on the existing highway network and will provide a sound basis for further investigation through additional joint working. On that basis, the Council supports the planned intervention, identified by the Doncaster Infrastructure Strategy Annex, March 2019 that 'A joint feasibility study between Doncaster and Bassetlaw Councils and Nottinghamshire County Council will be prepared to investigate solutions (including traffic management measures) to resolve road traffic congestion at Tickhill Spital junction and elsewhere along the A631 corridor to ensure that it does not exacerbate congestion.' Bassetlaw District Council consider that the joint feasibility study should ensure both Councils fully understand the perceived highway capacity issues and the approach to any future mitigation by all relevant partners. This work will be an essential element of the ongoing, positive Duty to Cooperate work between the two Councils. As such, the Council supports the production of the Revised Statement of Common Ground (2019) which evidences the ongoing cooperation that is taking place between the two Councils through the plan-making process. The Council agrees with Paragraph 67 that 'Consultation with Bassetlaw District Council on the Draft Statement of Common Ground has highlighted that there are on-going and unresolved issues which require further dialogue. Further work and dialogue is taking place to resolve these issues as the Local Plan progresses.' Until the feasibility study is complete and agreed by all partners, both Councils are unable to agree a highways mitigation solution. The perceived impacts of traffic movements upon air quality, noise and heritage in Bawtry and Tickhill will also remain unknown. On that basis, Bassetlaw District Council reserves the right, through the plan-making process to continue to discuss with Doncaster Council the following matters identified by the Revised Statement of Common Ground, and where necessary provide additional evidence in relation to: - Local Highway Network: Paragraph 67, Agreement 8 - Air Quality and Noise: Paragraph 73, Agreement 10 - Built and Historic Environment: Paragraph 81, Agreement 16

Summary:
The Council Support Policy 13, specifically A) 11. Table 7 acknowledges the improvements required to improve access from North Nottinghamshire to Doncaster in light of recent growth. Concern was raised by DMBC that development in Harworth and Bircotes (Bassetlaw) has cumulatively negatively impacted on the capacity of the 1631 between Bawtry and Tickhill - especially the Stripe Road junction. Policy 13 recommends improvements to reduce congestion. It is understood evidence on capacity issues via transport assessments have been submitted as part of planning applications for development in Harworth. For clarification, reference to these should be made in Table 7. On that basis, the Council supports the planned intervention identified in the Infrastructure Strategy Annex (March 2019) that: ‘A joint feasibility study between Doncaster and Bassetlaw Councils and Nottinghamshire County Council will be prepared to investigate solutions (including traffic management measures) to resolve road traffic congestion at Tickhill Spital junction and elsewhere along the A631 corridor to ensure that it does not exacerbate congestion.’ This means both Council’s will fully understand the highways capacity issues and approach to mitigation my all relevant partners. This will be an essential element of ongoing Duty to Cooperate work between the two Councils. As such, the Council supports the production of the revised Statement of Common Ground 2019, which shows ongoing cooperation between the two councils. The Council agrees with para. 67 that 'Consultation with Bassetlaw District Council on the Draft Statement of Common Ground has highlighted that there are on-going and unresolved issues which require further dialogue. Further work and dialogue is taking place to resolve these issues as the Local Plan progresses. Until the feasibility study is complete and agreed by partners, both Council’s cannot agree mitigations. The impacts of traffic movements on Bawtry and Tickhill remain unknown. Therefore, Bassetlaw reserves the right to continue to discuss with Doncaster Council the following matters: - Local Highway Network: Paragraph 67, Agreement 8 - Air Quality and Noise: Paragraph 73, Agreement 10 - Built and Historic Environment: Paragraph 81, Agreement 16

Response:
Support for the policy is welcomed. Doncaster Council will continue to work with Bassetlaw DC on these matters including seeking solutions to the impact of traffic on Doncaster’s local highway network, through securing money from appropriate funding streams. The Statement of Common Ground is being updated as and when appropriate to reflect negotiations and discussions.
Add new introductory text: Investment in transport infrastructure will all be assessed within the carbon reduction pathway to 2050 for the Borough and the programme will be amended to achieve carbon emissions targets for transport. Best use will be made of all transport infrastructure. Public transport by road or rail will be prioritized over road transport. Wherever possible freight should be conveyed by rail or water. Road capacity will be demand managed and any increase will be a measure of last resort, once all reasonable alternatives have been implemented and failed to achieve the desired outcomes. Proposals will be supported which:

- Amend policy as follows: A) Delete all listed, except the Hatfield Link Road (?), and move A to the bottom of the policy. B) 1.Delete and replace with ‘a new railway station at DSA on the Lincoln line.’ D) 5. Delete ‘aviation and’

**Response:**

The policy as drafted is considered ‘sound’ - see response to the comments above.
Comment Ref:  C/Policy 13/0198/2/002
Attend Examination:  Written Representation
Reason:
Area:  Chapter 7: Transport, Access & Infrastructure
Policy:  Policy 13: Strategic Transport Network

Tests of Soundness:

Comment:
Network Rail is supportive of the policies identified above: Policy 13 - is positively prepared in relation to the strategic rail network.

Summary:
Network Rail is supportive of the Policy 13 - it is positively prepared in relation to the strategic rail network.

Response:
Support noted.
The use of waterways for the transportation of waterborne freight, especially bulk materials and abnormal loads, is a form of sustainable transport which can help in reducing greenhouse gas emissions and can reduce congestion on the local highway network. Efforts to mitigate against the adverse impacts of traffic are promoted by paragraph 102 of the National Planning Policy Framework and in, in the case of larger loads, in the governments water preferred policy for the movement of abnormal loads. Correspondence from the Department for Transport to PINS highlights the policy position 3 for the movement of abnormal indivisible loads by water, and the advisory role of Highways England. https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2018/02/wpp_letter.pdf The Trust has identified the Sheffield & South Yorkshire Navigation (including the River Don and New Junction Canal) as being a ‘priority freight route’, which is a waterway where discussions with port operators suggest there is significant potential for them to accommodate inland traffic. In this case, the waterway provides a direct inland route from the Humber ports. We welcome the reference within part D) 3 to navigation and wharf facilities along key waterways; and the opportunities this could provide for alternatives to road transport. Substantial new development is likely to occur during the plan period, including Doncaster Waterfront (phases I and II); Minster Canalside; Marshgate (Policy 69); and the Unity scheme at Stainforth. The extent of new development in these areas will require the removal and importation of a significant amount of rubble and building materials respectively. We are concerned that the existing policy wording, or supporting text, does not promote the use of alternative transport methods for temporary freight movements associated with construction; which could have significant adverse impacts upon traffic congestion and pollution; and could have adverse impacts upon the effectiveness of the Local Plan to address issues of congestion and pollution during the Plan Period. PROPOSED CHANGE We would support additional text within the policy text, which would make it clearer to decision makers that consideration for alternative transport, such as by rail or water, should be considered for development sites where this is feasible and practical. Suggested wording is provided below: "Where feasible and practical, large development sites should explore the potential for the use of alternatives to road transport for the supply of construction materials and aggregates to and from the site"
Comment:

Albeit after the previous consultation deadline, Highways England previously responded to the Autumn 2018 Consultation on the Draft Local Plan. In this review of the Publication Version it is noted that it is very similar to the Pre-Publication Draft Local Plan, with some small updates such as changes to the naming and quantum of development at some sites. Therefore, many of the comments provided in Highways England’s Email dated 15th August 2019 are still applicable regarding the need to understand the cumulative impact of the Local Plan allocations upon the Strategic Road Network [SRN], namely the A1(M) and the M18. Following recent meetings between Doncaster Council and Highways England, the need for Highways England to understand the SRN impact of the Local Plan in advance of the Examination in Public [EiP] has been discussed. Highways England has advised that its requirements are as summarised below: 1) High level mitigation needs to be determined at appropriate locations on the SRN, which Highways England would wish to see included in the Doncaster Infrastructure Strategy; and 2) Approximate costs will also be required in order to demonstrate deliverability. These requirements remain following the review of the Publication Version of the Plan. However, further detailed comments on the Publication Version are set out below.

Summary:

Acknowledge the fact Highways England responded late to the 2018 consultation, however comment was made. The publication version is noted as being very similar to the draft, therefore comments made in August 2019 on the 2018 draft are still applicable re: the need to understand the cumulative impact of the Local Plan allocations upon the Strategic Road Network [SRN], namely the A1(M) and the M18. Recent meetings have taken place between Highways England and DMBC to understand the SRN impact on the Local Plan in advance of the EiP. Highways England has advised its requirements are: 1) High level mitigation needs to be determined at appropriate locations on the SRN, which Highways England would wish to see included in the Doncaster Infrastructure Strategy; and 2) Approximate costs will also be required in order to demonstrate deliverability. These requirements remain.

Response:

Comments noted
The general principles set out in the Local Plan Publication Version document are generally supported by Highways England (where they are relevant to the SRN). However, the impact of the Local Plan upon the A1(M) and the M18 is yet to be fully assessed. Highways England is keen to continue working with Doncaster Council to determine high level mitigation requirements and the associated approximate costs where they are necessary. In line with DfT Circular 02/2013 it is necessary for the Local Plan to identify the need for mitigation for both individual sites and cumulatively as part of the Local Plan. Once the Local Plan is adopted, the Circular only allows for the consideration of the details of the mitigation at the planning application stage. The principle of the development and the principle of mitigation should be established through the Local Plan. The larger site allocations or those located close to the SRN may impact on the SRN individually. The individual impacts of these will need to be assessed and potentially mitigated through the planning application process. However, the cumulative impact assessment needs to be undertaken of all the proposed Local Plan allocations, in order to identify that the Local Plan development impact can be accommodated on the SRN, either without mitigation or with mitigation of a scale that can be delivered through the Local Plan. Appropriate assumptions will need to be made within this cumulative assessment regarding the housing levels and mix in employment uses that is likely to come forward on each site.

Should the outcome of the cumulative impact assessment show that SRN locations require mitigation, it will need to be demonstrated that there are potential transport solutions which can be funded through the Local Plan. This may include developer contributions to facilitate the delivery of the necessary mitigation. Furthermore, once possible transport mitigation solutions have been identified, any infrastructure required at the SRN (in order to deliver the Local Plan) needs to be included within the Doncaster Infrastructure Delivery Plan (IDP) document. The policies in the Publication Version of the Plan are generally considered acceptable or are not relevant to Highways England. However, it is noted that the revised Policy 66 now that the Regs have been updated to remove the restriction on pooling.

Policy 66 no longer seems to allow for pooled contributions to be collected from multiple developers towards highway mitigation schemes, in order to cater for the cumulative impact of developments, despite this being proposed in earlier versions of the Local Plan. Should the cumulative impact assessments reveal that mitigation is required at the SRN, then mechanisms will need to be put in to place in order to allow for contributions to the required schemes to be made by multiple developers. Further discussions need to be held between Highways England and Doncaster Council in relation to this matter. Additionally, it is noted that Table 7 sets out details of planned A1(M) capacity improvements. However, for the avoidance of doubt it should be stressed that these improvements are subject to Route Investment Strategy (RIS) 2 funding which is expected to be confirmed in Autumn 2019.

General principles set out in the publication version are generally supported by Highways England, however the impact on the A1(M) and the M18 has yet to be assessed. Highways England is keen to continue working with DMBC to establish high level mitigation requirements and associated approximate costs where necessary. As per DfT Circular 02/2013, the Local Plan must identify mitigation for individual sites and cumulatively as part of the Local Plan. The principle of development and mitigation should be established through the Local Plan. Larger sites or those near to the SRN may impact on the SRN individually. These will need to be assessed and potentially mitigated through the planning application process. The cumulative impact assessment needs to be undertaken on all proposed sites to identify that the impact can be accommodated in the SRN either with or without mitigation of a scale that is deliverable through the Local Plan. Appropriate assumptions about housing levels and employment uses need to be made on each site. If mitigation is required it needs to be shown it can be funded through the Local Plan, including by developer contributions. Once possible mitigation solutions are identified, they need to be included in the Infrastructure Delivery Plan. The policies are generally acceptable or not relevant to Highways England. However, it is noted that the revised policy no longer allows for pooled contributions to be collected from multiple developers towards highway mitigation schemes to cater for cumulative impacts, despite this previously being included. Should cumulative impact assessments reveal that mitigation is required, then mechanisms need to be put in place in order to allow for contributions to schemes to be made by multiple developers. Further discussions between DMBC and Highways England are required. Table 7 sets out details of A1(M) capacity improvements, however it should be stressed this is subject to the Route Investment Strategy (RIS) 2 funding (expected to be confirmed Autumn 2019).

The IDP has been updated to include the outcome of the modelling and what the implications are in respect to local plan sites and associated improvements. Pooled contributions was removed due to the CIL Regulations but propose to reinstate as a Main Modification to policy 66 now that the Regs have been updated to remove the restriction on pooling.
Under point A) 4, it is stated that A1(M) motorway capacity improvements are supported. It is assumed that the current RIS2 plans for the A1 Redhouse to Darrington Improvements and the Doncaster Bypass fall under this heading. Further details are provided in Table 7 under Policy 13 regarding these planned schemes. However, funding for these improvements is yet to be confirmed. The schemes to be taken forward as part of RIS2 are due to be announced in Autumn 2019. **PROPOSED CHANGE** It is appreciated that the schemes are not specifically identified within the Plan as the Redhouse to Darrington Improvements or the Doncaster Bypass, however, for the avoidance of doubt, it is advised that Table 7 should identify that the SRN capacity improvements are subject to the RIS2 funding.

**Summary:**
Funding for A1(M) capacity improvements are supported - it is assumed that RIS2 plans for the A1 Redhouse to Darrington and the Doncaster bypass fall under this heading. However, funding is not yet confirmed, and schemes to be take forward are due to be accounted in Autumn 2019. Proposed change: for the avoidance of doubt, table 7 should specify that the SRN capacity improvements are subject to RIS2 funding.

**Response:**
Agree with Representation and therefore propose to include following as additional wording Table 7 as a minor modification as follows - "Capacity improvements to the Strategic Road Network are subject to Highways England funding"
**Comment:**

This chapter shows a good analysis of existing and future transport needs. The challenge will be to meet targets to reduce pollution created by movement of goods and people, while at the same time enhancing employment opportunities across the Borough. The JRP welcomes the inclusion of a by-pass for the A635 for Hickleton and Marr to alleviate congestion, improve air quality and reduce accidents (the most recent being 2 fatalities in September 2019). The challenge will be to determine and find the most suitable route for the by-pass which will serve the needs of road users whilst preserving the villages and the historic environment, particularly the Grade 1 heritage asset, Brodsworth Hall. The need for the A1/A19 link road, whose development is stated as being towards the end of the Plan, will increase employment opportunities in the north of the Borough, as indeed will the upgrading of the A1 by Highways England. However, all these developments should not be targeted to open up further employment sites for warehousing along the strategic road network in the west of Doncaster where it would encroach, not only on Green Belt, but also on prime agricultural land.

**Summary:**

The JRP welcomes the inclusion of a by-pass for the A635 for Hickleton and Marr to alleviate congestion, improve air quality and reduce accidents. The challenge will be to determine and find the most suitable route for the by-pass which will serve the needs of road users whilst preserving the villages and the historic environment, particularly the Grade 1 heritage asset, Brodsworth Hall. The need for the A1/A19 link road, whose development is stated as being towards the end of the Plan, will increase employment opportunities in the north of the Borough, as indeed will the upgrading of the A1 by Highways England. All these proposals should not be targeted to open up further employment sites for warehousing along the strategic road network in the west of Doncaster where it would encroach, not only on Green Belt, but also on prime agricultural land.

**Response:**

Comments are noted - these are matters of the spatial strategy. The local plan generally supports employment warehousing along the M18 corridor and Airport as opposed to the A1(M). The Carcroft Common site is not Green Belt however and is supported as an allocation (re-allocation).
8.1 Peel has a number of comments on the LP’s other strategic and non-strategic policies as currently drafted. These are summarised below:

8.2 Peel welcome the draft policy’s commitment that proposals will be supported which improve rail transport, including a new electrified mainline rail connection and railway station at DSA/ACY, which will connect to both the East Coast Mainline and the Doncaster to Lincoln line. 8.3 The policy needs to be accompanied by explanatory text which sets out that should these rail proposals come forward within the Plan Period, there will be a need to review the relevant policies of the LP as the rail connectivity will significantly increase and change the nature of development opportunities and needs (particularly at DSA/ACY) which is currently unaccounted for in the Local Plan. 8.4 The draft policy also refers to improved access to DSA from the M18. The policy is unclear as to what are the specific proposals to improve access to DSA from the M18 given the previous completion of Great Yorkshire Way. Peel seeks further clarification on this matter.

Summary:
Welcome the commitment that proposals will be supported which improve rail transport, including electrified mainline rail connection and airport rail station. The policy needs to be accompanied by explanatory text which sets out that if these come forward in the plan period, there will be a need to review the relevant Local Plan policies as rail connectivity will significantly increase and change the nature of development opportunities here, which the Plan currently does not account for. The draft policy also refers to improved access to DSA from the M18, it is unclear what specific proposals this refers to given the Great Yorkshire Way has been completed. Clarification is sought.

Response:
There is now a statutory requirement to review local plans at least every 5 years. In respect to M18 access improvements, this is a general reference to the potential need for improvements rather than a specific ‘new’ scheme, for example it could be in respect to signal improvements.
Comment:
The Local Plan does detail road infrastructure improvements from the M18 J4 to A630. This is welcome but long overdue. Many more road network improvements are necessary within the Edenthorpe/Kirk Sandall/Barnby Dun area to increase capacity and ease congestion before increasing housing quantity. An opportunity was missed with the replacement bridge at Armthorpe Lane, Barnby Dun by not also introducing road improvements to ease congestion. Road using residents of the area have endured 9 months of diversions for something that stands to only benefit business that will utilise larger freight trains. Other congestion 'hot-spots' in the area include the 4 way traffic light junction at Brecks Lane/Doncaster Road and the roundabout junction at Armthorpe Lane/A18. Whilst assessments from traffic surveys have been used, some are outdated and residents (who have signed the attached petition) agree that more road improvements are required imminently, definitely before the erection of more housing. (SEE SEPARATE REP FOR Petition) Closer to Site 147; the entry to Station Road from Pine Hall Road and Top Road from Hatfield Lane required improvements during Barnby Dun’s last housing expansion (Meadow Field Road). The Pine Hall Road/Station Road junction in particular is currently not fit for purpose with the volume of vehicles. Page 268 of the Local Plan does state that road improvements are required, but these must be completed before the housing development. Otherwise the improvement requirement risks being dis-regarded as with Meadow Field Road post completion of the development. Road improvements are necessary now, before the proposed additional 6500+ homes within the Edenthorpe/Kirk Sandall/Barnby Dun/Hatfield/Thorne area. Considering the vast increase of vehicles road improvements need to be significant. Recently there have been major road incidents at both the Pine Hall Road/Station road and Brecks Lane/Doncaster Road junctions. Risk of collision will increase with volume at these poor junctions so as it’s important that road infrastructure enhancements are made before a potential 13000 additional vehicles. Consideration should be to be given to speed restriction in the area especially along Hatfield Lane and speed ramps should be considered in some locations.

Summary:
Improvements to Westmoor link are long overdue and many more improvements to the network are needed around the area before housing is supported. Road improvements are necessary now, before the proposed additional 6500+ homes within the Edenthorpe/Kirk Sandall/Barnby Dun/Hatfield/Thorne area. Considering the vast increase of vehicles road improvements need to be significant. Recently there have been major road incidents at both the Pine Hall Road/Station road and Brecks Lane/Doncaster Road junctions. Risk of collision will increase with volume at these poor junctions so as it’s important that road infrastructure enhancements are made before a potential 13000 additional vehicles. Consideration should be to be given to speed restriction in the area especially along Hatfield Lane and speed ramps should be considered in some locations.

Response:
Comments are noted, the majority of the sites the Representation refers to are extant planning permissions where such matters will have been considered and addressed through the Development Management process. AECOM has undertaken assessment of the borough’s local highway network.
Tests of Soundness:

Comment:
UKOOG Response: UKOOG recognise the importance of minimising traffic movement where it is feasible to do so, and the onshore industry aims to maximise the reuse and recycling of materials and waste products from its operations, but any transport policy must align with the principal that minerals, including oil and gas, can only be worked where they are found. We are supportive of the policy requirement that, 'the network capacity will need to be established through the submission of a Transport Assessment', which in our view is aligned with Planning Practice Guidance and the NPPF.

Summary:
Policy 13. Recognises the importance of minimising traffic movement where it is feasible to do so. Supports of policy requirement for transport assessments.

Response:
Comment Noted.
The principle of the policy to minimise traffic movement where it is feasible to do so is supported. The onshore minerals industry aims to maximise the reuse and recycling of materials and waste products from its operations, but any transport policy must align with the principal that minerals, including oil and gas, can only be worked where they occur. IGas is supportive of the policy requirement that, 'the network capacity will need to be established through the submission of a Transport Assessment', which is in alignment with national planning policy.

**Summary:**


**Response:**

Comment noted
Comment Ref: C/Policy 13/05214/1/011
Attend Examination: Attend Hearing
Reason: To support the representation and inspectors understanding of the site.
Area: Chapter 7: Transport, Access & Infrastructure
Policy: Policy 13: Strategic Transport Network

Tests of Soundness: Positively prepared Effective
Justified Consistent with national

Comment:
3.73 Policy 13 supports the improvements to rail transport including a new electrified main line rail connection and new railway station at Doncaster Sheffield Airport, connecting the airport onto the East Coast Mainline. 3.74 The inclusion of a policy advocating a new station at Doncaster Sheffield Airport is strongly supported. Such infrastructure provision will not only support the sustainable development of the DSA area but also the enhanced sustainability of the existing settlements within the locality. 3.75 The allocation of Site 446 for Housing development will help to deliver this significant piece of infrastructure to support the continued growth of the DSA Masterplan.

Summary:
Policy 13 - Strategic transport Network. 1. Strongly support new rail station at the airport. 2. Site 446 will help facilitate delivery of rail station.

Response:
Comments and support for rail improvements and DSA station welcomed and noted - housing site 446 is not proposed as a housing allocation in the plan - see site selection methodology
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<th>CUSREF: 05283</th>
<th>Name: Freeths LLP</th>
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<tr>
<td>Date: 30/09/2019</td>
<td>Organisation: Freeths LLP</td>
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<td>Representing: Hallam Land Management Ltd</td>
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**Comment Ref:** C/Policy 13/05283/1/005

**Attend Examination:** Attend Hearing

**Reason:** Our representations relate to a number of key strategic policies of the Plan and we wish to have the opportunity to explain our evidence in greater detail.

**Area:** Chapter 7: Transport, Access & Infrastructure

**Policy:** Policy 13: Strategic Transport Network

**Tests of Soundness:**
- Positively prepared
- Effective
- Justified
- Consistent with national

**Comment:**

HLM/HBD support Policy 13 and the identified improvements to the strategic transport network. In particular, HLM/HBD support the proposed North Doncaster A1-A19 link, which will be important in realising the potential of employment and regeneration opportunities in the north.

**Summary:**

Support Policy 13 and the identified SRM improvements - in particular the A1 - A19 link, which is important for realising the potential of employment and regeneration opportunities in the north.

**Response:**

Support welcome
Test of Soundness:

Comment:
Marr Parish are in principle supportive of DMBC’s strategies provided existing redundant and brownfield sites are prioritised over Greenbelt locations and we do not believe, job creation can be considered ‘very special circumstances’. We also agree with DMBC’s assessment of the A1(M), that no development should occur along this route until after the A1(M) has been upgraded, since it will restrict options for it to be widened and lead to further congestion. Marr Parish reiterates its very strong opinion, that widening of the A1(M) should be to the east, since rural, Greenbelt Conservation villages are located too closely to the west. In keeping with its economic growth proposals, as well as, being one of the 7 Economic Target Areas in the Sheffield City Region - Marr Parish fully support development of brownfield land along the M18

Summary:
In identifying land allocations, redundant and brownfield sites should be prioritised over Green Belt locations - job creation can be considered 'very special circumstances' to release Green Belt. Agree with the assessment that no development should occur along the A1(M) until it has been upgraded, since it will restrict options for it to be widened and lead to further congestion. Widening of the A1(M) should be to the east, since rural, Greenbelt Conservation villages are located too closely to the west. In keeping with its economic growth proposals, as well as being one of the 7 Economic target areas in the Sheffield City Region - Marr Parish fully supports development of brownfield land along the M18

Response:
Brownfield and non-Green Belt sites have been allocated where they are available and deliverable/developable. None of the employment allocation is on Green Belt land. The need for improvements to capacity along the A1(M) are identified via the plan (Policy 13). Note support to develop brownfield sites along the M18 corridor although it should be noted that the employment allocations are all on greenfield sites due to the lack of availability of brownfield options.
Marr Parish Meeting understands how vital Transport Links are & how they can contribute to the prosperity of the Town, combined with the need to have an Infrastructure that supports growth and this is considered in our views and concerns. 1) Marr Parish note the feedback from the previous consultation, in that 77% of the responses "supported the expansion of the A1/A1 (M) to a) improve connectivity and b) relieve congestion. However...many people are of the opinion that the impact on the Green Belt should be kept to a minimum and that improvements should not necessarily be a precursor to further development in the A1 corridor". Marr Parish unanimously agree with this view and support DMBC in their assessment that development along the A1(M) corridor is inappropriate, "there are congestion problems along the A1(M) which currently limit the delivery of new large scale strategic employment sites? a decision supported by Highways England on the grounds of ‘capacity and safety concerns’. 2) Marr Parish support the proposed widening of the existing A1/A1 (M) but is completely opposed to the creation of a new build A1/A1 (M). However, where the A1/A1 (M) currently runs (from the northern boundary of the Borough to Marr) there is only a narrow band of Green Belt Land separating a number of rural villages and farms from this road. We acknowledge that some Green Belt land will potentially need to be utilised to enable road widening but this must be kept to a minimum. Marr Parish would not support the expansion of the A1/A1 (M) to the west or the creation of a “new” A1/A1 (M) on Green Belt land which as a result would create Green Belt land isolated within an old and new A1/A1 (M). 3) Marr Parish still firmly believe there is no requirement or public demand for a link road between the A19 and A1 (M) and therefore does not support it. We also noted from previous consultation feedback that this proposed initiative had by far the lowest support ‘and attracted a number of negative comments’. Highways England Route Strategy 2015 states: ‘.one of the priority issues is the capacity and safety concerns on the A1 between junctions 34 (Blyth) and Holmfirth Interchange (M62).’ And they further state: ‘if there is a lack of capacity to support growth?’ We support DMBC in their interpretation of Highways England when they state ‘it is unlikely that extra traffic on the A1 (M) will be supported by Highways England?’ The proposed A19 link road to the A1 (M) will mean generating extra traffic onto this already congested stretch of the A1 (M). In light of overwhelming evidence against this proposal Marr Parish cannot accept that this link road remains in the Local Plan and we reaffirm our objection to this link road on these grounds. There is more than sufficient access to the east of the Borough and beyond via the A1 to the M62 or M18 or via the existing A19 and as such we believe this scheme should not be included within the Local Plan Draft. 4) Marr Parish agrees with DMBC’s appraisal of the M18 that it has capacity for further growth. Along with 77% of respondents on previous consultation feedback, we also support development along this transport corridor and acknowledge that it is ‘of strategic importance for freight and logistics as it is a vital link to a number of strategic road network sections in SY as well as to the Humber ports’.7 there are significant levels of growth which are focused along the M18 corridor and that it will need to be adapt to additional traffic flows created by corridor developments and increases in tonnage through the Humber ports. Development here has the ability to grow in line with demand and we note ‘Together with demand information which shows that large end users wish to be located along the M18 and congestion & access issues along the A1 (M), there is currently no exceptional circumstance justification for Greenbelt land to be allocated for employment use, and no Greenbelt sites will be proposed for allocation.’. As previously stated, we recognise the strategic importance of employment development along the M18 and the opportunity to deliver Lorry Parks on Brownfield and that in doing so, it will not consume any Greenbelt land, a policy which we fully support and endorse. 5) We support the dualling of the A630 Westmoor Link Road to improve access to Wheatley Hall Road / Kirk Sandall and potentially release the vast acreage of land and large number of underdeveloped brownfield sites in this location for development. 6) We support the Hatfield Link road scheme to connect Hatfield/Stainforth to Junction 5 of the M18/Junction 1 of the M180 and unlocking 200ha of development land. 7) We remain encouraged by previous consultation feedback, in that ‘Clearly the A635 Bypass is the favoured scheme and has received a significant number of comments in support’. Supported by 66% of respondents, it received by far the strongest support for road schemes and similar to that of the A1 (M). With strong declared support and endorsement from Doncaster’s electorate, Marr Parish believes this Bypass should be included within the Full Local Plan Draft Proposal. As Doncaster grows, there will be an increasing imperative to address the congested trunk roads in the West of the Borough. We firmly believe the much needed A635 by-pass must be a priority for delivery within the Local Plan. Previously, we believed The Local Plan demonstrated a preference for concentrating the majority of its trunk road development proposals towards the east. We consider this may now be corrected with the inclusion of this by-pass within the Local Plan. It is critical to improving accessibility and connectivity to neighbouring towns and boroughs in the Sheffield City Regional Council, as well as Wakefield, which are all only accessible via the west. We still maintain that improved transport links to these boroughs and towns will lead to greater development opportunities. Within their Local Plan reports, DMBC further acknowledge that Sheffield City Region has cited the A635 as one of the ‘top 20 highways forecast to experience delays and could limit economic growth’. With such a poor endorsement, it is imperative that a rapid solution be implemented to address these issues. Doncaster cannot afford to lose the potential for economic growth if it is to meet its ambitious growth targets, as detailed within the draft Local Plan. Currently all trunk roads to the west side of the Borough are congested and are in use 24/7 along the A635 and the A638. The latest figures for the A635 show 15% of vehicles thundering through Marr and Hickleton are HGVs. Marr parish would like to see the upgrading of these trunk roads in the Finalised Local Plan Proposal to reduce traffic congestion, pollution and round-the-clock noise pollution in Hickleton, Marr and Hampole, and to improve access to Barnsley and Wakefield respectively. The Local Plan suggests a route for the by-pass, however, this has yet to be determined with external consultants presently carrying out an outline business case for a by-pass, including several route recommendations. This view is mirrored by 73% of the respondents who agreed
with the statement ‘Greater emphasis should be given to managing traffic movements to reduce accidents and improve air quality’. DMBC proposes to develop thousands of homes near to and around the A635 e.g. at Brodsworth, Woodlands and Mexborough, added to this the thousands of homes projected to be built by Barnsley MBC within the vicinity of the A635, the resultant increase in vehicles along these routes will have a further detrimental and devastating impact on the safety of our roads, the environment and communities. Within these, our village and residents continue to have very real, credible and valid concerns about the resulting impact that this pollution is having on their own health, their children’s and that of their elderly neighbours. DMBC stated over the last 2 years that the A635 exceeded DMBC’s own safety volume criteria, traffic volume has increased and resulting congestion is exacerbating already dangerous high levels of Air Pollution. Fumes from road vehicles have created poor Air Quality through both Marr and Hickleton, with NOx levels consistently above and in excess of 150% of the maximum permitted levels set by DEFRA. Air Quality levels at Hickleton are the second highest recorded in Doncaster. The volume of commuters travelling to and from Doncaster to Barnsley, means that congestion directly impacts other road transport routes which link into the A635 e.g. Scawby, Barnburgh & Harlington, High Melton, Pickburn and Brodsworth. This cannot be allowed to continue. Doncaster’s ambitious growth plans, together with Barnsley’s development proposals and a congested A1, will only serve to exacerbate this situation. DMBC must prioritise and invest in the existing road/transport infrastructure before it proposes to invest in new link roads, if it is to meet its expected housing growth needs. As a result, the A635 bypass is now a “need to have” in the full Local Plan Draft Proposal. We support DMBC’s new Policies on Air Pollution, Noise Pollution, inclusive communities and road congestion and advocate that they are given equal weight in consideration of planning applications as previously these issues have been given very little regard. 8) We strongly oppose the current High Speed Phase 2b proposed rail route through Doncaster and South Yorkshire as well as a proposed rail junction at Clayton or a Dearne Valley Parkway Station. 9) We agree that rail links to the Airport would help to take traffic off the roads and aid congestion.

Summary:
Support is given to view that any development along the A1M corridor is inappropriate prior to its upgrading - but also that any improvements should not necessarily be a precursor to further development in the corridor. Would not support the expansion of the A1/A1 (M) to the west or the creation of a “new” A1/A1 (M) on Green Belt land which would create Green Belt land isolated within an old and new A1/A1(M). There is no requirement or public demand for a link road between the A19 and A1 (M) - it should not be included in the Local Plan. Support given to further growth along the M18 corridor. Support the dualing of the A630 West Moor Link Road to improve access to Wheatley Hall Road / Kirk Sandall and potentially release the vast acreage of land and large number of underdeveloped brown field sites in this location for development. Support the Hatfield Link road scheme to connect Hatfield/Stainforth to Junction 5 of the M18/Junction 1 of the M180 and unlocking 200ha of development land. Support the continued inclusion of the Hickleton /Marr bypasses. Strongly oppose the current High Speed Phase 2b proposed rail route through Doncaster and South Yorkshire as well as a proposed rail junction at Clayton or a Dearne Valley Parkway Station. Agree that rail links to the Airport would help to take traffic off the roads and aid congestion.

Response:
Comments are noted - these are matters for the spatial strategy. The local plan generally supports employment warehousing along the M18 corridor and Airport as opposed to the A1(M). The Carcroft Common site is not Green Belt however and is supported as an allocation (re- allocation). The A1-A19 link road is a priority and required to improve accessibility and regeneration for the north of the borough. There are currently no proposals to duel Westmoor Link (this was previously proposed however). HS2 route is safeguarded in the local plan under Direction of the Secretary of State and the Council has no choice but to show the route on he Local Plan policies map.
| **Reason:** | To assist the Inspector by using our submitted representations to answer his/her questions, particularly in light of the evidence submitted by other representors and any other matters the Inspector may raise. |
| **Area:** | Chapter 7: Transport, Access & Infrastructure |
| **Policy:** | Policy 14: Promoting Sustainable Transport in New Developments |
| **Tests of Soundness:** | Positively prepared | Effective |
| | Justified | Consistent with national |
| **Comment:** | Amend to fit with changes to Policy 13 B) 2nd para delete 'capacity and' B) 3rd para delete rest of sentence after 'measures' |
| **Summary:** | Amend to fit with changes to Policy 13 B) 2nd para delete 'capacity and' B) 3rd para delete rest of sentence after 'measures' |
| **Response:** | See response above - changes not accepted so these are consequential. |
Comment: As highlighted in our response to the Draft Plan, we welcome reference within part A)3 to the wording that new development should provide linkages to the wider walking and cycling network. Our towpath network provides a publicly accessible route for pedestrians and cyclists through the borough, and we would encourage its use by new residents. With regards to part A)5, we welcome the re-worded policy, which now refers to them mitigate the impact of development on the wider transport network, as opposed to the existing highways and transport infrastructure as previously worded. We welcome this amendment, as we believe it will allow the Local Plan to allow decision makers to fully assess the impact of the additional use brought by development on the pedestrian and cycling network in the borough; which would help the Local Plan meet key objectives in promoting and maintain the use of sustainable transport.

Summary: As highlighted in our response to the Draft Plan, we welcome reference within part A)3 to the wording that new development should provide linkages to the wider walking and cycling network. Our towpath network provides a publicly accessible route for pedestrians and cyclists through the borough, and we would encourage its use by new residents. With regards to part A)5, we welcome the re-worded policy, which now refers to them mitigate the impact of development on the wider transport network, as opposed to the existing highways and transport infrastructure as previously worded. We welcome this amendment, as we believe it will allow the Local Plan to allow decision makers to fully assess the impact of the additional use brought by development on the pedestrian and cycling network in the borough; which would help the Local Plan meet key objectives in promoting and maintain the use of sustainable transport.

Response: Support noted.
Comment Ref: C/Policy 14/04013/1/009  
Attend Examination: Written Representation  
Reason:  
Area: Chapter 7: Transport, Access & Infrastructure  
Policy: Policy 14: Promoting Sustainable Transport in New Developments  
Tests of Soundness:  

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<td>The JRP notes that policy 14 details the strategy for Promoting Sustainable Transport in New Developments. It hopes that the Planning Authority will be robust in its requirements for new developments. Evidence suggests otherwise. For example, the housing development, off Longlands Lane, on the former Brodsworth colliery site, has a housing allocation of 342. [Ch 16, Table H1(B)] The first phase is completed. There is little evidence that sustainable modes of transport have been considered. People walk to work along this rural road, which is unlit, has no speed limit, no pavements and overhanging trees. Without clear, robust transport plans, monitoring and enforcement are ineffective.</td>
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<td>The JRP hopes that the Planning Authority will be robust in its requirements for new developments arising from Policy 14. Evidence suggests otherwise. For example, the housing development, off Longlands Lane, on the former Brodsworth colliery site, has a housing allocation of 342. [Ch 16, Table H1(B)] The first phase is completed. There is little evidence that sustainable modes of transport have been considered. People walk to work along this rural road, which is unlit, has no speed limit, no pavements and overhanging trees. Without clear, robust transport plans, monitoring and enforcement are ineffective.</td>
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<td>The Representation is in respect to a planning permission currently under construction where such matters have been considered through the Development Management process.</td>
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Comment Ref:  C/Policy 14/04955/1/007
Attend Examination:  Attend Hearing
Reason: 
Area:  Chapter 7: Transport, Access & Infrastructure
Policy:  Policy 14: Promoting Sustainable Transport in New Developments

Tests of Soundness:

Comment:
2.34 At the previous stage of representations, we commented on part b) of the policy which related to planning obligations being sought as part of development proposals for future transport projects. We objected to that requirement on the grounds that it would fail the tests for when an obligation can be sought and was unreasonable. We welcome the fact that requirement has now been omitted. 2.35 Part b) of the policy now states that 'proposals that require new projects will be required to make a proportionate financial contribution'. In principle, we accept this approach however we believe further detail should be provided as to how this will be calculated and we reserve our position to comment further should more detailed information be provided.

Summary:
Policy 14 - Promoting sustainable transport within new developments Part b) States that 'proposals that require new projects will be required to make a proportionate financial contribution'. In principle supports this approach. Further detail should be provided as to how this will be calculated.

Response:
Welcome support to revised wording - further detail is being provided through the AECOM local transport modelling work.
Comment:
2.34 At the previous stage of representations, we commented on part b) of the policy which related to planning obligations being sought as part of development proposals for future transport projects. We objected to that requirement on the grounds that it would fail the tests for when an obligation can be sought and was unreasonable. We welcome the fact that requirement has now been omitted. 2.35 Part b) of the policy now states that 'proposals that require new projects will be required to make a proportionate financial contribution'. In principle, we accept this approach however we believe further detail should be provided as to how this will be calculated and we reserve our position to comment further should more detailed information be provided.

Summary:
Policy 14 - Promoting sustainable transport within new developments Part b) States that 'proposals that require new projects will be required to make a proportionate financial contribution'. In principle supports this approach. Further detail should be provided as to how this will be calculated.

Response:
Welcome support to revised wording - further detail is being provided through the AECOM local transport modelling work.
Comment Ref:  C/Policy 14/05211/1/006
Attend Examination:  Attend Hearing

Area:  Chapter 7: Transport, Access & Infrastructure
Policy:  Policy 14: Promoting Sustainable Transport in New Developments

Tests of Soundness:  Positively prepared  Effective
Justified  Consistent with national

Comment:
6.1. Avant Homes are concerned with aspects of Policy 14, Avant Homes consider that Policy 14 is unsound. Test of Soundness  6.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about?  X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 6.3. Avant Homes is supportive of the principles of Policy 14, However Avant Homes are concerned with aspects of the policy.  6.4. Avant Homes are concerned with part A-4 which seeks to ensure that appropriate levels of parking provision are made in accordance with the standards contained within Appendix 6.  6.5. Appendix 6 notes, that for residential development, parking provision will be considered on a case by case basis. Avant Homes considers that Policy 14 part A 4 should be revised to ensure that the policy is flexible in relation to residential development, and ensure that the policy is consistent with the text within Appendix 6.  6.6. Further, Avant Homes are concerned with Part B of the policy which requires post development monitoring of traffic and mitigation measures in the event that traffic levels agreed through the original permission are later exceeded. Avant Homes consider that this is onerous and increases uncertainty for developers in relation to the cost of the development. It is unclear how this requirement will be enforced.  6.7. Avant Homes consider that with increased flexibility in part A 4 in line with the text within Appendix 6, and removal of the requirement for post development monitoring and mitigation under part B the Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 6.11. To overcome the objection and address soundness matters, the Council should: - Provide greater flexibility residential development in Policy 14 Part A 4 and improve consistency with Appendix 6. - Remove the part B requirement for post development monitoring of traffic and mitigation.

Summary:
Policy 14 -promoting sustainable Transport in New Development  1. Support policy in principle.  2. Concerned with part A4 - parking provision  3. Policy should be more flexible and consistent with Appendix 6.  4. Part B - Monitoring of traffic post development. This is onerous. Not clear how it will be enforced.  5. Part B should be removed.

Response:
Car parking standards are based on the Council's evidence and considered appropriate. Monitoring is a fundamental aspect of the planning process and is set out from the beginning of the application process so has certainty.
6.1. Metroland are concerned with aspects of Policy 14. Metroland consider that Policy 14 is unsound. Test of Soundness 6.2. Metroland considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 6.3. Metroland is supportive of the principles of Policy 14. However Metroland are concerned with aspects of the policy. 6.4. Metroland are concerned with part A 4 which seeks to ensure that appropriate levels of parking provision are made in accordance with the standards contained within Appendix 6. 6.5. Appendix 6 notes, that for residential development, parking provision will be considered on a case by case basis. Metroland considers that Policy 14 part A 4 should be revised to ensure that the policy is flexible in relation to residential development, and ensure that the policy is consistent with the text within Appendix 6. 6.6. Further, Metroland are concerned with Part B of the policy which requires post development monitoring of traffic and mitigation measures in the event that traffic levels agreed through the original permission are later exceeded. 6.7. Metroland consider that this is onerous and increases uncertainty for developers in relation to the cost of the development. It is unclear how this requirement will be enforced. 6.8. Policy 14, in its current form, is not justified and does not provide an appropriate strategy and is not consistent with national policy. 6.9. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 6.10. However, we consider that with increased flexibility in part A 4 in line with the text within Appendix 6, and removal of the requirement for post development monitoring and mitigation under part B the Plan can be found sound. Metroland will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 6.11. To overcome the objection and address soundness matters, the Council should: - Provide greater flexibility residential development in Policy 14 Part A 4 and improve consistency with Appendix 6. - Remove the part B requirement for post development monitoring of traffic and mitigation.

Summary:
Policy 14 -promoting sustainable Transport in New Development 1. Support policy in principle. 2. Concerned with part A4 - parking provision 3. Policy should be more flexible and consistent with Appendix 6. 4. Part B - Monitoring of traffic post development. This is onerous. Not clear how it will be enforced. 5. Part B should be removed.

Response:
Car parking standards are based on the Council's evidence and considered appropriate. Monitoring is a fundamental aspect of the planning process and is set out from the beginning of the application process so has certainty.
Comment Ref: C/Policy 14/05250/1/004

Attend Examination: Attend Hearing

Reason:

Area: Chapter 7: Transport, Access & Infrastructure

Policy: Policy 14: Promoting Sustainable Transport in New Developments

Tests of Soundness:

Justified

Comment:

Draft Policy 14 seeks to implement the car parking standards referenced within Appendix 6 of the DLP. Whilst the supporting text to the residential development car parking standards acknowledge that residential developments within the town centre will be assessed on an individual basis, it applies a blanket minimum standard for all other areas. This fails to recognise that some sites outside of the town centre may also be within highly accessible locations, where a lower provision of car parking would be appropriate. Furthermore, setting a minimum standard for a higher level of car parking than is necessary would be contradictory to DC’s commitments to pollution and addressing air quality as emphasised elsewhere within the DLP. The Policy is therefore not justified and should be amended to confirm that all schemes, including those outside of the town centre, will be considered on a site by site basis, acknowledging that the minimum car parking standards may not be appropriate or necessary in some areas. CONCLUSION: However, in relation to the draft policies listed below, the DLP as currently drafted is not justified and unsound. To make the plan sound, the following amendments noted above are required. Policy: Policy 14 Topic: Car Parking

Requested Change: Policy should be amended to confirm that all schemes, including those outside of the town centre, will be considered on a site by site basis, acknowledging that the minimum car parking standards may not be appropriate or necessary in some areas.

Summary:

Policy 14 should be amended to confirm that all schemes, including those outside of the town centre, will be considered on a site by site basis, acknowledging that the minimum car parking standards may not be appropriate or necessary in some areas. This fails to recognise that some sites outside of the town centre may also be within highly accessible locations, where a lower provision of car parking would be appropriate. Furthermore, setting a minimum standard for a higher level of car parking than is necessary would be contradictory to DC’s commitments to pollution and addressing air quality as emphasised elsewhere within the DLP.

Response:

The Car Parking standards have been developed in line with overarching objectives of the SCR Transport Strategy and aligned to those developed but other South Yorkshire Authorities. Appendix 6 is clear that there is a need to reflect local circumstances, context and requirements of individual developments when assessing applications (see para 2 of Appendix 6).
3.51. We agree with draft policy 14. Our reasoning is set out below: 3.52. In continuation to the NPF (para 8), there is great importance on sustainable development and one key way in which new developments can achieve a sustainable development is through the efficient movement of people and goods and to maximise the use of sustainable forms of transport. The requirement for new residential developments to be linked to the local centres to reduce journey times supports is in line strategic policies 2 and 3. 3.53. It is worth noting that the land at Grange Farm is already well serviced by public transport and also well connected in terms of walking and cycling. The site will offer improvements to existing road junctions and investment to improve existing and create new, safe pedestrian and cycle links. Recommendation 8: Ensure that sustainable transport is incorporated into the design of developments in the interests of effective and positive planning.
Tests of Soundness:

Comment:
We believe there needs to be a change in Planning Policy. It is essential that DMBC carry out full due diligence at proposed Development sites. They must instigate and invest in Traffic surveys in order to assess the individual and cumulative effects of any proposed development. We believe it reasonable to expect prior independent surveys be carried out by DMBC and not by any proposed developers before any proposed sites can even be considered as potentially appropriate or suitable for development. It is vital that cumulative impacts from proposed developments are measured at the outset to establish what the compounding impact will have on neighbouring villages & communities and on already congested trunk /local transport routes. This must be done ahead of sites being designated as appropriate or they cannot to be considered truly sustainable. It is our very strong view that DMBC must not allow individual site assessment to be undertaken and/or funded by developers, since all reports will be presumed as biased and prejudicial in their favour. Current Planning Policy dictates that individual developers finance impact assessment reports only specifically relating to their own proposed development plans. The Planning Committee can then only base their decision on an individual ‘case by case’ basis. With many sites being proposed for development within the local plan, we have both a duty and an opportunity to address accumulative effects, thus preventing us from creating new problems or adding to problematic road congestion or increasing particulates leading to poor or worsening Air Quality. Awareness of the cumulative impacts means that we can stop these types of issues happening before they arise. This would be in keeping with DMBC’s Carbon Emissions and Green Policies. When DMBC have completed the Local Plan, a list of all potential development sites will be created. It is our very firm view that such development sites are all independently assessed by DMBC but pre-funded by the developer. This would provide not only an independent assessment of each site but would highlight any accumulative effect of delivering multiple developments within areas. Developers must then work together to fund any remedial, preventative or mitigation measures resulting from their multiple developments. We believe this proposal is a reasonable and rational solution. If implemented, it gives the opportunity to address or prevent cumulative negative impacts created by DMBC’s extensive development plans within communities. We recommend this policy is reviewed and considered for implementation.

Summary:
Traffic surveys of all proposed development sites should be required to assess the individual and cumulative effects of any proposed development - should be undertaken independently by the Council and not by proposed developers but could be pre-financed by developers.

Response:
The local plan has undertaken modelling of all local plan development sites (both individually and cumulatively) on both the strategic road network and local highways network - see supporting evidence base such as AECOM report.
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**Comment:**

B) Add new 6. 'Cycle routes will be shorter than routes for cars wherever practicable.' Add new 7 'Road space will be reallocated to cycling if segregated routes cannot be provided' C3. Add, in new development for employment provide changing and showering facilities;

**Response:**

The suggested changes to part B of the policy may be preferable but not considered as being something that can be achievable in all instances so difficult to include in policy. The suggested addition to C3 is more achievable and is proposed to be included as a Main Modification to the plan.
Comment Ref: C/Policy 18/0077/6/015

Attend Examination: Attend Hearing

Reason: To assist the Inspector by using our submitted representations to answer his/her questions, particularly in light of the evidence submitted by other representors and any other matters the Inspector may raise.

Area: Chapter 7: Transport, Access & Infrastructure

Policy: Policy 18: Walking in Doncaster

Tests of Soundness: Positively prepared
Effective
Justified
Consistent with national

Comment:
Add 'provide alternative direct routes to local facilities and the town centre'

Summary:
Add 'provide alternative direct routes to local facilities and the town centre'

Response:
The Representation is not clear why this is considered necessary and in our view is already covered by the policy.
We support the Borough's prioritisation of walking. Policy 20 (D) notes that "routes should link into the surrounding public rights of way network or adopted highway network to maintain and improve connectivity and ease of movement." Cadeby PM notes that there is no direct walking access to the village other than on a road. The current public footpath to Sprotbrough stops short of the east end of Cadeby village - in due course consideration should be given to linking this public footpath to the pedestrian pavement which terminates at the eastern end of the village (north side), thereby allowing walkers to complete a circuit from Sprotbrough Falls via Cadeby and the Don Gorge.

Support is given to the Borough's prioritisation of walking. Policy 20 (D) notes that "routes should link into the surrounding public rights of way network or adopted highway network to maintain and improve connectivity and ease of movement." Cadeby Parish Meeting notes that there is no direct walking access to the village other than on a road. The current public footpath to Sprotbrough stops short of the east end of Cadeby village - in due course consideration should be given to linking this public footpath to the pedestrian pavement which terminates at the eastern end of the village (north side), thereby allowing walkers to complete a circuit from Sprotbrough Falls via Cadeby and the Don Gorge.

Response:
Comments are noted, however this is not a local plan issue
8.1. Strata Homes is concerned with aspects of Policy 19. Test of Soundness 8.2. Strata Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy  Justification 8.3. Strata Homes is concerned with part D of the policy which states that "unrecorded routes or desire lines that cross development sites" will be treated in the same way as definitive public rights of way. 8.4. Strata Homes considers that such an approach on non-definitive footpaths is onerous and restrictive and could hinder the delivery of schemes. The effect of such a restrictive approach coupled with requirements for on-site open space, national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. 8.5. Strata Homes consider that the Policy as it stands is not justified and does not provide an appropriate strategy. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 8.6. Strata Homes consider that the policy with increased flexibility or removal of part D of Policy 19 it can be made sound. Strata Homes will continue to work with the Council to develop appropriate wording. Proposed Change 8.7. To overcome the objection and address soundness matters, the Council should: - Incorporate flexibility or remove part D of the policy.

Summary:
Strata Homes is concerned with part D of the policy which states that "unrecorded routes or desire lines that cross development sites" will be treated in the same way as definitive public rights of way. Such an approach on non-definitive footpaths is onerous and restrictive and could hinder the delivery of schemes. The effect of such a restrictive approach coupled with requirements for on-site open space, national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. Strata Homes consider that the policy with increased flexibility or removal of part D of Policy 19 it can be made sound. Strata Homes will continue to work with the Council to develop appropriate wording.

Response:
Re Policy 19 Part D. It is not considered unreasonable that a developer should ‘consider’ un-recorded public footpaths on a site. If this part of the Policy was not in place it would be highly likely that any un-recorded footpaths would be given no consideration and would be lost by default.
We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

The requirement for developers to consider any unrecorded public paths that cross development sites and to treat them in the same way as definitive public rights of way is not sound. It is not justified as no evidence is provided to support this requirement nor is it consistent with national policy. The NPPF, paragraph 98, mentions the need to protect and enhance public rights of way it does not, however, provide the same protection to unrecorded public paths. This policy therefore places an overly onerous and restrictive requirement on development proposals which could affect the delivery on development proposals and therefore the plan when combined with other policy requirements. It is respectfully requested that part D of this policy is removed.

Re Policy 19 Part D. It is not considered unreasonable that a developer should 'consider' un-recorded public footpaths on a site. If this part of the Policy was not in place it would be highly likely that any un-recorded footpaths would be given no consideration and would be lost by default.
Comment Ref: C/Policy 19/03506/1/008

Name: Spawforth Associates
Organisation: Spawforth Associates
Representing: Mr Paul Burtwistle

Area: Chapter 7: Transport, Access & Infrastructure

Tests of Soundness:
- Positively prepared
- Effective
- Justified
- Consistent with national

Comment:

8.1. H. Burtwistle & Son is concerned with aspects of Policy 19. Test of Soundness 8.2. H. Burtwistle & Son considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 8.3. H. Burtwistle & Son is concerned with part D of the policy which states that "unrecorded routes or desire lines that cross development sites" will be treated in the same way as definitive public rights of way. 8.4. H. Burtwistle & Son considers that such an approach on non-definitive footpaths is onerous and restrictive and could hinder the delivery of schemes. The effect of such a restrictive approach coupled with requirements for on-site open space, national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. 8.5. H. Burtwistle & Son consider that the Policy as it stands is not justified and does not provide an appropriate strategy. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 8.6. H. Burtwistle & Son consider that the policy with increased flexibility or removal of part D of Policy 19 it can be made sound. H. Burtwistle & Son will continue to work with the Council to develop appropriate wording. Proposed Change 8.7. To overcome the objection and address soundness matters, the Council should: - Incorporate flexibility or remove part D of the policy.

Response:

Re Policy 19 Part D. It is not considered unreasonable that a developer should ‘consider’ un-recorded public footpaths on a site. If this part of the Policy was not in place it would be highly likely that any un-recorded footpaths would be given no consideration and would be lost by default.
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8.1. H. Burtwistle & Son is concerned with aspects of Policy 19. Test of Soundness 8.2. H. Burtwistle & Son considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 8.3. H. Burtwistle & Son is concerned with part D of the policy which states that "unrecorded routes or desire lines that cross development sites" will be treated in the same way as definitive public rights of way. 8.4. H. Burtwistle & Son considers that such an approach on non-definitive footpaths is onerous and restrictive and could hinder the delivery of schemes. The effect of such a restrictive approach coupled with requirements for on-site open space, national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. 8.5. H. Burtwistle & Son consider that the Policy as it stands is not justified and does not provide an appropriate strategy. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 8.6. H. Burtwistle & Son consider that the policy with increased flexibility or removal of part D of Policy 19 it can be made sound. H. Burtwistle & Son will continue to work with the Council to develop appropriate wording. Proposed Change 8.7. To overcome the objection and address soundness matters, the Council should: - Incorporate flexibility or remove part D of the policy.

**Summary:**
Concerned with part D of the policy which states that "unrecorded routes or desire lines that cross development sites" will be treated in the same way as definitive public rights of way. Consider that the policy with increased flexibility or removal of part D of Policy 19 it can be made sound.

**Response:**
Re Policy 19 Part D. It is not considered unreasonable that a developer should ‘consider’ un-recorded public footpaths on a site. If this part of the Policy was not in place it would be highly likely that any un-recorded footpaths would be given no consideration and would be lost by default.
Test of Soundness:

Consistent with national

Comment:

2.36 Our Client always strives to provide high quality pedestrian routes within their developments and they welcome a policy which seeks to protect public rights of way where possible. However, part d) of the policy states ‘developers will be expected to consider any unrecorded public paths that cross development sites and treat them in the same way as a definitive public rights of way’. This is wholly unacceptable, unsound and should be deleted from the policy. Unrecorded paths that run through sites have no legal protection and to state that they should be retained and treated in the same manner as a public right of way, which does have legal protection, is completely unreasonable. 2.37 This approach is not advocated within the Revised Framework and as such this proposal is not in accordance with national guidance and should be deleted.

Summary:

Policy 19 - Development affecting public rights of way Part (d) - re unrecorded public rights of way. 1. This is totally unacceptable. Unrecorded sites have no legal protection. 2. This is not in compliance with the NPPF.

Response:

Re Policy 19 Part D. It is not considered unreasonable that a developer should ‘consider’ un-recorded public footpaths on a site. If this part of the Policy was not in place it would be highly likely that any un-recorded footpaths would be given no consideration and would be lost by default.
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Summary:
Policy 19 - Development affecting public rights of way Part (d) - re unrecorded public rights of way. 1. This is totally unacceptable. Unrecorded sites have no legal protection. 2. This is not in compliance with the NPPF.

Response:
Re Policy 19 Part D. It is not considered unreasonable that a developer should 'consider' un-recorded public footpaths on a site. If this part of the Policy was not in place it would be highly likely that any un-recorded footpaths would be given no consideration and would be lost by default.
Framecourt Homes welcomes the opportunity for further engagement and the opportunity to appear at the Examination in Public.

Framecourt Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? 

- Positively Prepared
- Effective
- Justified
- Consistency with National Policy

Framecourt Homes is concerned with part D of the policy which states that "unrecorded routes or desire lines that cross development sites" will be treated in the same way as definitive public rights of way. Framecourt Homes considers that such an approach on non-definitive footpaths is onerous and restrictive and could hinder the delivery of schemes. The effect of such a restrictive approach coupled with requirements for on-site open space, national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement.

Framecourt Homes consider that the Policy as it stands is not justified and does not provide an appropriate strategy. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound.

To overcome the objection and address soundness matters, the Council should:
- Incorporate flexibility or remove part D of the policy.

Concerned with 19 (D) which states desire lines will be treated in the same way as PROWs. This is onerous and restrictive and could hinder delivery of schemes. Coupled with other on site requirements it could impact on delivery and the numbers of houses deliverable. The policy is not justified or an appropriate strategy. It is unsound. To address this, Policy 19 should incorporate flexibility or part D should be removed.

Re Policy 19 Part D. It is not considered unreasonable that a developer should ‘consider’ un-recorded public footpaths on a site. If this part of the Policy was not in place it would be highly likely that any un-recorded footpaths would be given no consideration and would be lost by default.
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**Summary:**

Concerned about part D which states that "unrecorded routes or desire lines that cross development sites" will be treated in the same way as definitive public rights of way. This is onerous and restrictive and could hinder scheme delivery - especially when considered against other developer requirements and this could hinder the ability to achieve the housing requirement. The policy is not justified and does not provide an appropriate strategy. The plan is not sound. Proposed change: incorporate flexibility or remove part D of the policy.

**Response:**

Re Policy 19 Part D. It is not considered unreasonable that a developer should ‘consider’ un-recorded public footpaths on a site. If this part of the Policy was not in place it would be highly likely that any un-recorded footpaths would be given no consideration and would be lost by default.
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Summary:
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Response:
Re Policy 19 Part D. It is not considered unreasonable that a developer should 'consider' un-recorded public footpaths on a site. If this part of the Policy was not in place it would be highly likely that any un-recorded footpaths would be given no consideration and would be lost by default.
## Tests of Soundness

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### Response

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Summary:

Response:
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Summary:

Response:
Re Policy 19 Part D. It is not considered unreasonable that a developer should 'consider' un-recorded public footpaths on a site. If this part of the Policy was not in place it would be highly likely that any un-recorded footpaths would be given no consideration and would be lost by default.
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Summary:

Concerned with part D of the policy which states that "unrecorded routes or desire lines that cross development sites" will be treated in the same way as definitive public rights of way. Such an approach on non-definitive footpaths is onerous and restrictive and could hinder the delivery of schemes. The effect of such a restrictive approach coupled with requirements for on-site open space, national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. The Policy as it stands is not justified and does not provide an appropriate strategy. The policy with increased flexibility or removal of part D of Policy 19 it can be made sound

Response:

Re Policy 19 Part D. It is not considered unreasonable that a developer should ‘consider’ un-recorded public footpaths on a site. If this part of the Policy was not in place it would be highly likely that any un-recorded footpaths would be given no consideration and would be lost by default.
7.1. Metroland is concerned with aspects of Policy 19. Test of Soundness

7.2. Metroland considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy

7.3. Metroland is concerned with part D of the policy which states that "unrecorded routes or desire lines that cross development sites" will be treated in the same way as definitive public rights of way.

7.4. Metroland considers that such an approach on non-definitive footpaths is onerous and restrictive and could hinder the delivery of schemes. The effect of such a restrictive approach coupled with requirements for on-site open space, national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement.

7.5. Metroland consider that the Policy as it stands is not justified and does not provide an appropriate strategy. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound.

7.6. Metroland consider that the policy with increased flexibility or removal of part D of Policy 19 it can be made sound. Metroland will continue to work with the Council to develop appropriate wording.

Proposed Change

7.7. To overcome the objection and address soundness matters, the Council should: - Incorporate flexibility or remove part D of the policy.

Summary:

1. Concerned with Part D
2. Approach to none definitive footpaths is onerous and restrictive and could hinder delivery.
3. Should incorporate some flexibility.

Response:

Re Policy 19 Part D. It is not considered unreasonable that a developer should 'consider' un-recorded public footpaths on a site. If this part of the Policy was not in place it would be highly likely that any un-recorded footpaths would be given no consideration and would be lost by default.
Reason: We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Tests of Soundness:

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Comment:

The requirement for developers to consider any unrecorded public paths that cross development sites and to treat them in the same way as definitive public rights of way is not sound. It is not justified as no evidence is provided to support this requirement nor is it consistent with national policy. The NPPF, paragraph 98, mentions the need to protect and enhance public rights of way it does not, however, provide the same protection to unrecorded public paths. This policy therefore places an overly onerous and restrictive requirement on development proposals which could affect the delivery on development proposals and therefore the plan when combined with other policy requirements. It is respectfully requested that part D of this policy is removed.

Summary:

Policy 19 Part D’s requirement for developers to consider any unrecorded public paths that cross development sites and to treat them in the same way as definitive public rights of way is not sound. It is not justified as no evidence is provided to support this requirement nor is it consistent with national policy. The NPPF, paragraph 98, mentions the need to protect and enhance public rights of way it does not, however, provide the same protection to unrecorded public paths. This policy therefore places an overly onerous and restrictive requirement on development proposals which could affect the delivery on development proposals and therefore the plan when combined with other policy requirements.

Response:

Re Policy 19 Part D. It is not considered unreasonable that a developer should ‘consider’ un-recorded public footpaths on a site. If this part of the Policy was not in place it would be highly likely that any un-recorded footpaths would be given no consideration and would be lost by default.
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Tests of Soundness:

**Comment:**
Policy 19 is concerned with development which affects public rights of way and at B) indicates that where development leads to the diversion of an existing right of way, a suitable alternative must be established, following the principles outlined in Policies 20 and 21. However, rather than setting out principles, Policy 20 is more prescriptive, expecting proposals to meet access, design and layout considerations in respect of public rights of way and highways network. The two policies are therefore inconsistent. Objection is made to Policy 20 which should be redrafted as set out below: "Proposals will be expected to apply the following principles in relation to access, design and layout considerations in respect of public rights of way and highways network whilst balancing this with the need to maximise the effective use of land. Reason: In order to avoid prescription whilst balancing the need to protect public rights of way against the need to maximise the effective use of land.

**Summary:**
- The 2 policies are inconsistent.
- Policy 19 Part B - Development which affects a PROW - re an alternative must be established following the principles outlined in Policies 20 and 21.
- Policy 20 is more prescriptive expecting proposals to meet access, design and layout considerations in respect of PROW and Highways Network.
- Policy 20 should be re-drafted to avoid prescription whilst balancing the need to protect PROW with the needs to maximise land use. Policy 20 - Access, Design and Layout of Public Rights of Way. Should be re-worded. Representation includes a suggested re-wording for the Policy.

**Response:**
Re Policy 19 Part D. It is not considered unreasonable that a developer should 'consider' un-recorded public footpaths on a site. If this part of the Policy was not in place it would be highly likely that any un-recorded footpaths would be given no consideration and would be lost by default.
9.1. Strata Homes is concerned with aspects of Policy 20 and therefore consider that the Policy 20 is unsound. Test of Soundness

9.2. Strata Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X Positively Prepared X Effective X Justified X Consistency with National Policy Justification

9.3. Strata Homes is concerned with parts B and C of the policy which specifies the routes and dimensions of public rights of way. 9.4. Strata Homes considers that such an approach is onerous and restrictive and could hinder the delivery of schemes. The requirements for public rights of way to avoid estate roads and where the path is enclosed to be of 3 to 5 metres is over engineered and beyond what is required. 9.5. The effect of such a restrictive approach coupled with requirements for on-site open space, national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. 9.6. Strata Homes consider that the policy in its present form is not justified and consider that the Plan is unsound. 9.7. Strata Homes consider that the Plan with greater flexibility or the removal of the restrictive elements of Policy 20 the Plan can be made sound. Strata Homes will continue to work with the Council to develop appropriate wording. Proposed Change 9.8. To overcome the objection and address soundness matters, the Council should: - Incorporate flexibility or remove the restrictive elements in parts B and C of the policy.

Summary:

Strata Homes is concerned with parts B and C of the policy which specifies the routes and dimensions of public rights of way. Such an approach is onerous and restrictive and could hinder the delivery of schemes. The requirements for public rights of way to avoid estate roads and where the path is enclosed to be of 3 to 5 metres is over engineered and beyond what is required. The effect of such a restrictive approach coupled with requirements for on-site open space, national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. Strata Homes consider that the Plan with greater flexibility or the removal of the restrictive elements of Policy 20 the Plan can be made sound. Strata Homes will continue to work with the Council to develop appropriate wording.

Response:

Doncaster council is committed to creating and providing a high quality access infrastructure for all users. Please see the Rights of Way Improvement Plan 2017-2027 (available on the DMBC website). It is not considered that the considerations detailed in Policy 20 do anything other than provide a framework to ensure provision of a quality network.
Comment Ref: C/Policy 20/03431/1/008

Reason: We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Area: Chapter 7: Transport, Access & Infrastructure


Tests of Soundness:

Justified

Comment:

It is considered that this policy is not justified. Parts B and C of the policy specify the routes and dimensions of public rights of way. This policy is onerous and restrictive and could hinder the delivery of schemes. The requirements for public rights of way to avoid estate roads and where the path is enclosed to be a minimum width of 3 to 5 metres is over-engineered and beyond what is necessary. No evidence is provided to support this policy or the requirements set out within it. It is requested that parts B and C of the policy are removed or sufficient flexibility incorporated into the policy wording.

Summary:

Parts B and C of Policy 20 specify the routes and dimensions of public rights of way. This policy is onerous and restrictive and could hinder the delivery of schemes. The requirements for public rights of way to avoid estate roads and where the path is enclosed to be a minimum width of 3 to 5 metres is over-engineered and beyond what is necessary. No evidence is provided to support this policy or the requirements set out within it.

Response:

Doncaster council is committed to creating and providing a high quality access infrastructure for all users. Please see the Rights of Way Improvement Plan 2017-2027 (available on the DMBC website). It is not considered that the considerations detailed in Policy 20 do anything other than provide a framework to ensure provision of a quality network.
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</table>

**Comment:**

9.1. H. Burtwistle & Son is concerned with aspects of Policy 20 and therefore consider that the Policy 20 is unsound. Test of Soundness 9.2. H. Burtwistle & Son considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 9.3. H. Burtwistle & Son is concerned with parts B and C of the policy which specifies the routes and dimensions of public rights of way. 9.4. H. Burtwistle & Son considers that such an approach is onerous and restrictive and could hinder the delivery of schemes. The requirements for public rights of way to avoid estate roads and where the path is enclosed to be of 3 to 5 metres is over engineered and beyond what is required. 9.5. The effect of such a restrictive approach coupled with requirements for on-site open space, national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. 9.6. H. Burtwistle & Son consider that the policy in its present form is not justified and consider that the Plan is unsound. 9.7. H. Burtwistle & Son consider that the Plan with greater flexibility or the removal of the restrictive elements of Policy 20 the Plan can be made sound. H. Burtwistle & Son will continue to work with the Council to develop appropriate wording. Proposed Change 9.8. To overcome the objection and address soundness matters, the Council should: - Incorporate flexibility or remove the restrictive elements in parts B and C of the policy.

**Summary:**

is concerned with parts B and C of the policy which specifies the routes and dimensions of public rights of way. Such an approach is onerous and restrictive and could hinder the delivery of schemes. The requirements for public rights of way to avoid estate roads and where the path is enclosed to be of 3 to 5 metres is over engineered and beyond what is required. The effect of such a restrictive approach coupled with requirements for on-site open space, national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement.

**Response:**

Doncaster council is committed to creating and providing a high quality access infrastructure for all users. Please see the Rights of Way Improvement Plan 2017-2027 (available on the DMBC website). It is not considered that the considerations detailed in Policy 20 do anything other than provide a framework to ensure provision of a quality network.
Comment Ref: C/Policy 20/03507/1/009

Attend Examination: Attend Hearing

Reason:

Area: Chapter 7: Transport, Access & Infrastructure


Tests of Soundness: Positively prepared Effective Justified Consistent with national

Comment:

9.1. H. Burtwistle & Son is concerned with aspects of Policy 20 and therefore consider that the Policy 20 is unsound. Test of Soundness 9.2. H. Burtwistle & Son considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 9.3. H. Burtwistle & Son is concerned with parts B and C of the policy which specifies the routes and dimensions of public rights of way. 9.4. H. Burtwistle & Son considers that such an approach is onerous and restrictive and could hinder the delivery of schemes. The requirements for public rights of way to avoid estate roads and where the path is enclosed to be of 3 to 5 metres is over engineered and beyond what is required. 9.5. The effect of such a restrictive approach coupled with requirements for on-site open space, national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. 9.6. H. Burtwistle & Son consider that the policy in its present form is not justified and consider that the Plan is unsound. 9.7. H. Burtwistle & Son consider that the Plan with greater flexibility or the removal of the restrictive elements of Policy 20 the Plan can be made sound. H. Burtwistle & Son will continue to work with the Council to develop appropriate wording. Proposed Change 9.8. To overcome the objection and address soundness matters, the Council should: - Incorporate flexibility or remove the restrictive elements in parts B and C of the policy.

Summary:

Concerned with parts B and C of the policy which specifies the routes and dimensions of public rights of way. Consider that the Plan with greater flexibility or the removal of the restrictive elements of Policy 20 the Plan can be made sound.

Response:

Doncaster council is committed to creating and providing a high quality access infrastructure for all users. Please see the Rights of Way Improvement Plan 2017-2027 (available on the DMBC website). It is not considered that the considerations detailed in Policy 20 do anything other than provide a framework to ensure provision of a quality network.
Comment Ref: C/Policy 20/05176/1/010

Attend Examination: Attend Hearing

Reason: Framecourt Homes welcomes the opportunity for further engagement and the opportunity to appear at the Examination in Public.

Area: Chapter 7: Transport, Access & Infrastructure


Tests of Soundness: Positively prepared | Effective
| Justified | Consistent with national

Comment:

9.1. Framecourt Homes is concerned with aspects of Policy 20 and therefore consider that the Policy 20 is unsound. Test of Soundness
9.2. Framecourt Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification
9.3. Framecourt Homes is concerned with parts B and C of the policy which specifies the routes and dimensions of public rights of way. 9.4. Framecourt Homes considers that such an approach is onerous and restrictive and could hinder the delivery of schemes. The requirements for public rights of way to avoid estate roads and where the path is enclosed to be of 3 to 5 metres is over engineered and beyond what is required. 9.5. The effect of such a restrictive approach coupled with requirements for on-site open space, national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. 9.6. Framecourt Homes consider that the policy in its present form is not justified and consider that the Plan is unsound. 9.7. Framecourt Homes consider that the Plan with greater flexibility or the removal of the restrictive elements of Policy 20 the Plan can be made sound. Framecourt Homes will continue to work with the Council to develop appropriate wording. Proposed Change 9.8. To overcome the objection and address soundness matters, the Council should:
- Incorporate flexibility or remove the restrictive elements in parts B and C of the policy.

Summary:
Concerned at Policy 20 (B) (C) which specifies the routes and dimensions of PROW. The approach is onerous and restrictive and could hinder scheme delivery. The requirement to avoid estate roads and where the path is enclosed to be 3 - 5m is over engineered and beyond what is required. Coupled with other requirements there could be implications for housing schemes and their delivery / ability to achieve the housing requirement. This is unjustified and the plan is unsound. With greater flexibility or the removal of restrictive elements of Policy 20 (B) and (C) the plan can be made sound.

Response:
Doncaster council is committed to creating and providing a high quality access infrastructure for all users. Please see the Rights of Way Improvement Plan 2017-2027 (available on the DMBC website). It is not considered that the considerations detailed in Policy 20 do anything other than provide a framework to ensure provision of a quality network.
Comment:

9.1. Avant Homes is concerned with aspects of Policy 20 and therefore consider that the Policy 20 is unsound. Test of Soundness 9.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 9.3. Avant Homes is concerned with parts B and C of the policy which specifies the routes and dimensions of public rights of way. 9.4. Avant Homes considers that such an approach is onerous and restrictive and could hinder the delivery of schemes. The requirements for public rights of way to avoid estate roads and where the path is enclosed to be of 3 to 5 metres is over engineered and beyond what is required. 9.5. The effect of such a restrictive approach coupled with requirements for on-site open space, national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. 9.6. Avant Homes consider that the policy in its present form is not justified and consider that the Plan is unsound. 9.7. Avant Homes consider that the Plan with greater flexibility or the removal of the restrictive elements of Policy 20 the Plan can be made sound. Avant Homes will continue to work with the Council to develop appropriate wording. Proposed Change 9.8. To overcome the objection and address soundness matters, the Council should: - Incorporate flexibility or remove the restrictive elements in parts B and C of the policy.

Summary:

Concerned about part B and C re: specifying the routes and dimensions of PROW. Consider the approach onerous and restrictive and could hinder site delivery. The requirements for public rights of way to avoid estate roads and where the path is enclosed to be of 3 to 5 metres is over engineered and beyond what is required. The effect when coupled with developer requirements and policy standards could impact on delivery and meeting the housing target. The policy is not justified and the plan unsound. Proposed change: incorporate flexibility or remove the restrictive elements in parts B and C of the policy.

Response:

Doncaster council is committed to creating and providing a high quality access infrastructure for all users. Please see the Rights of Way Improvement Plan 2017-2027 (available on the DMBC website). It is not considered that the considerations detailed in Policy 20 do anything other than provide a framework to ensure provision of a quality network.
Comment Ref: C/Policy 20/05209/1/010

Organisation: Spawforths
Representing: Avant Homes Ltd

Tests of Soundness: 
- Positively prepared
- Effective
- Justified
- Consistent with national

Comment:

9.1. Avant Homes is concerned with aspects of Policy 20 and therefore consider that the Policy 20 is unsound. Test of Soundness 9.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X Positively Prepared X Effective X Justified X Consistency with National Policy Justification 9.3. Avant Homes is concerned with parts B and C of the policy which specifies the routes and dimensions of public rights of way. 9.4. Avant Homes considers that such an approach is onerous and restrictive and could hinder the delivery of schemes. The requirements for public rights of way to avoid estate roads and where the path is enclosed to be of 3 to 5 metres is over engineered and beyond what is required. 9.5. The effect of such a restrictive approach coupled with requirements for on-site open space, national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. 9.6. Avant Homes consider that the policy in its present form is not justified and consider that the Plan is unsound. 9.7. Avant Homes consider that the Plan with greater flexibility or the removal of the restrictive elements of Policy 20 the Plan can be made sound. Avant Homes will continue to work with the Council to develop appropriate wording. Proposed Change 9.8. To overcome the objection and address soundness matters, the Council should: - Incorporate flexibility or remove the restrictive elements in parts B and C of the policy.

Response:

Doncaster council is committed to creating and providing a high quality access infrastructure for all users. Please see the Rights of Way Improvement Plan 2017-2027 (available on the DMBC website). It is not considered that the considerations detailed in Policy 20 do anything other than provide a framework to ensure provision of a quality network.
Comment Ref: C/Policy 20/05210/1/010
Attend Examination: Attend Hearing
Reason:
Area: Chapter 7: Transport, Access & Infrastructure
Tests of Soundness: Positively prepared Effective Justified Consistent with national
Comment:

9.1. Avant Homes is concerned with aspects of Policy 20 and therefore consider that the Policy 20 is unsound. Test of Soundness 9.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 9.3. Avant Homes is concerned with parts B and C of the policy which specifies the routes and dimensions of public rights of way. 9.4. Avant Homes considers that such an approach is onerous and restrictive and could hinder the delivery of schemes. The requirements for public rights of way to avoid estate roads and where the path is enclosed to be of 3 to 5 metres is over engineered and beyond what is required. 9.5. The effect of such a restrictive approach coupled with requirements for on-site open space, national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. 9.6. Avant Homes consider that the policy in its present form is not justified and consider that the Plan is unsound. 9.7. Avant Homes consider that the Plan with greater flexibility or the removal of the restrictive elements of Policy 20 the Plan can be made sound. Avant Homes will continue to work with the Council to develop appropriate wording. Proposed Change 9.8. To overcome the objection and address soundness matters, the Council should: - Incorporate flexibility or remove the restrictive elements in parts B and C of the policy.

Summary:
Concerned about part B and C re: specifying the routes and dimensions of PROW. Consider the approach onerous and restrictive and could hinder site delivery. The requirements for public rights of way to avoid estate roads and where the path is enclosed to be of 3 to 5 metres is over engineered and beyond what is required. The effect when coupled with developer requirements and policy standards could impact on delivery and meeting the housing target. The policy is not justified and the plan unsound. Proposed change: incorporate flexibility or remove the restrictive elements in parts B and C of the policy.

Response:
Doncaster council is committed to creating and providing a high quality access infrastructure for all users. Please see the Rights of Way Improvement Plan 2017-2027 (available on the DMBC website). It is not considered that the considerations detailed in Policy 20 do anything other than provide a framework to ensure provision of a quality network.
8.1. Avant Homes is concerned with aspects of Policy 20 and therefore consider that the Policy 20 is unsound. Test of Soundness

8.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X Positively Prepared X Effective X Justified X Consistency with National Policy

8.3. Avant Homes is concerned with parts B and C of the policy which specifies the routes and dimensions of public rights of way.

8.4. Avant Homes considers that such an approach is onerous and restrictive and could hinder the delivery of schemes. The requirements for public rights of way to avoid estate roads and where the path is enclosed to be of 3 to 5 metres is over engineered and beyond what is required.

8.5. The effect of such a restrictive approach coupled with requirements for on-site open space, national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement.

8.6. Avant Homes consider that the policy in its present form is not justified and consider that the Plan is unsound.

8.7. Avant Homes consider that the Plan with greater flexibility or the removal of the restrictive elements of Policy 20 the Plan can be made sound. Avant Homes will continue to work with the Council to develop appropriate wording.

Proposed Change

8.8. To overcome the objection and address soundness matters, the Council should:

- Incorporate flexibility or remove the restrictive elements in parts B and C of the policy.

Summary:

Policy 20 - Access, design and layout of Public Rights of way. 1. Parts B&C restrictive and could hinder development. 2. Incorporate some flexibility or remove restrictive elements.

Response:

Doncaster council is committed to creating and providing a high quality access infrastructure for all users. Please see the Rights of Way Improvement Plan 2017-2027 (available on the DMBC website). It is not considered that the considerations detailed in Policy 20 do anything other than provide a framework to ensure provision of a quality network.
Comment Ref: C/Policy 20/05213/1/010
Attend Examination: Attend Hearing

Reason:
Area: Chapter 7: Transport, Access & Infrastructure

Tests of Soundness: Positively prepared Effective Justified Consistent with national

Comment:
9.1. Priority Space is concerned with aspects of Policy 20 and therefore consider that the Policy 20 is unsound. Test of Soundness
9.2. Priority Space considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy
9.3. Priority Space is concerned with parts B and C of the policy which specifies the routes and dimensions of public rights of way. 9.4. Priority Space considers that such an approach is onerous and restrictive and could hinder the delivery of schemes. The requirements for public rights of way to avoid estate roads and where the path is enclosed to be of 3 to 5 metres is over engineered and beyond what is required. 9.5. The effect of such a restrictive approach coupled with requirements for on-site open space, national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. 9.6. Priority Space consider that the policy in its present form is not justified and consider that the Plan is unsound. 9.7. Priority Space consider that the Plan with greater flexibility or the removal of the restrictive elements of Policy 20 the Plan can be made sound. Priority Space will continue to work with the Council to develop appropriate wording. Proposed Change 9.8. To overcome the objection and address soundness matters, the Council should: - Incorporate flexibility or remove the restrictive elements in parts B and C of the policy.

Summary:
Policy 20 - Access, design and layout of Public Rights of way. 1. Parts B&C restrictive and could hinder development. 2. Incorporate some flexibility or remove restrictive elements.

Response:
Doncaster council is committed to creating and providing a high quality access infrastructure for all users. Please see the Rights of Way Improvement Plan 2017-2027 (available on the DMBC website). It is not considered that the considerations detailed in Policy 20 do anything other than provide a framework to ensure provision of a quality network.
Concerned with parts B and C of Policy 20 which specifies the routes and dimensions of public rights of way. Such an approach is onerous and restrictive and could hinder the delivery of schemes. The requirements for public rights of way to avoid estate roads and where the path is enclosed to be of 3 to 5 metres is over engineered and beyond what is required. The effect of such a restrictive approach coupled with requirements for on-site open space, national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. Firsure consider that the policy in its present form is not justified and consider that the Plan is unsound. Firsure consider that the Plan with greater flexibility or the removal of the restrictive elements of Policy 20 the Plan can be made sound.
8.1. Metroland is concerned with aspects of Policy 20 and therefore consider that the Policy 20 is unsound. Test of Soundness 8.2. Metroland considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 8.3. Metroland is concerned with parts B and C of the policy which specifies the routes and dimensions of public rights of way. 8.4. Metroland considers that such an approach is onerous and restrictive and could hinder the delivery of schemes. The requirements for public rights of way to avoid estate roads and where the path is enclosed to be of 3 to 5 metres is over engineered and beyond what is required. 8.5. The effect of such a restrictive approach coupled with requirements for on-site open space, national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. 8.6. Metroland consider that the policy in its present form is not justified and consider that the Plan is unsound. 8.7. Metroland consider that the Plan with greater flexibility or the removal of the restrictive elements of Policy 20 the Plan can be made sound. Metroland will continue to work with the Council to develop appropriate wording. Proposed Change 8.8. To overcome the objection and address soundness matters, the Council should: – Incorporate flexibility or remove the restrictive elements in parts B and C of the policy

Summary:
Policy 20 - Access, design and layout of Public Rights of way. 1. Parts B&C restrictive and could hinder development. 2. Incorporate some flexibility or remove restrictive elements.

Response:
Doncaster council is committed to creating and providing a high quality access infrastructure for all users e.g. the Rights of Way Improvement Plan 2017-2027. It is not considered that the requirements detailed in Policy 20 do anything other than provide a framework to ensure provision of a quality network.
| CUSREF: | 05289 | Name: | Persimmon Homes |
| Date: | 26/09/2019 | Organisation: | Persimmon Homes |
| Representing: | | |
| Comment Ref: | C/Policy 20/05289/1/008 |
| Attend Examination: | Attend Hearing |
| Reason: | We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster. |
| Area: | Chapter 7: Transport, Access & Infrastructure |
| Tests of Soundness: | | |
| | Justified |
| Comment: | It is considered that this policy is not justified. Parts B and C of the policy specify the routes and dimensions of public rights of way. This policy is onerous and restrictive and could hinder the delivery of schemes. The requirements for public rights of way to avoid estate roads and where the path is enclosed to be a minimum width of 3 to 5 metres is over-engineered and beyond what is necessary. No evidence is provided to support this policy or the requirements set out within it. It is requested that parts B and C of the policy are removed or sufficient flexibility incorporated into the policy wording. |
| Summary: | Parts B and C of Policy 20 specify the routes and dimensions of public rights of way. This policy is onerous and restrictive and could hinder the delivery of schemes. The requirements for public rights of way to avoid estate roads and where the path is enclosed to be a minimum width of 3 to 5 metres is over-engineered and beyond what is necessary. No evidence is provided to support this policy or the requirements set out within it. |
| Response: | Doncaster council is committed to creating and providing a high quality access infrastructure for all users. Please see the Rights of Way Improvement Plan 2017-2027 (available on the DMBC website). It is not considered that the considerations detailed in Policy 20 do anything other than provide a framework to ensure provision of a quality network. |
Comment Ref: C/Policy 20/05290/1/008
Attend Examination: Attend Hearing
Reason: We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Area: Chapter 7: Transport, Access & Infrastructure

Tests of Soundness:

Justified

Comment:
It is considered that this policy is not justified. Parts B and C of the policy specify the routes and dimensions of public rights of way. This policy is onerous and restrictive and could hinder the delivery of schemes. The requirements for public rights of way to avoid estate roads and where the path is enclosed to be a minimum width of 3 to 5 metres is over-engineered and beyond what is necessary. No evidence is provided to support this policy or the requirements set out within it. It is requested that parts B and C of the policy are removed or sufficient flexibility incorporated into the policy wording.

Summary:
Parts B and C of Policy 20 specify the routes and dimensions of public rights of way. This policy is onerous and restrictive and could hinder the delivery of schemes. The requirements for public rights of way to avoid estate roads and where the path is enclosed to be a minimum width of 3 to 5 metres is over-engineered and beyond what is necessary. No evidence is provided to support this policy or the requirements set out within it.

Response:
Doncaster council is committed to creating and providing a high quality access infrastructure for all users. Please see the Rights of Way Improvement Plan 2017-2027 (available on the DMBC website). It is not considered that the considerations detailed in Policy 20 do anything other than provide a framework to ensure provision of a quality network.
Policy 19 is concerned with development which affects public rights of way and at B) indicates that where development leads to the diversion of an existing right of way, a suitable alternative must be established, following the principles outlined in Policies 20 and 21. However, rather than setting out principles, Policy 20 is more prescriptive, expecting proposals to meet access, design and layout considerations in respect of public rights of way and highways network. The two policies are therefore inconsistent. Objection is made to Policy 20 which should be redrafted as set out below: "Proposals will be expected to apply the following principles in relation to access, design and layout considerations in respect of public rights of way and highways network whilst balancing the need to protect public rights of way against the need to maximise the effective use of land. Reason: In order to avoid prescription whilst balancing the need to protect public rights of way against the need to maximise the effective use of land.

Response:

Doncaster council is committed to creating and providing a high quality access infrastructure for all users. Please see the Rights of Way Improvement Plan 2017-2027 (available on the DMBC website). It is not considered that the considerations detailed in Policy 20 do anything other than provide a framework to ensure provision of a quality network.
Network Rail is supportive of Policy 21 - this provides protection for the safety of road and rail users and is positively prepared and effective.
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<th>CUSREF:</th>
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**Comment Ref:** S/Policy 22, Criterion I/0016/28/016  
**Attend Examination:** Not Stated  
**Reason:**  
**Area:** Chapter 7: Transport, Access & Infrastructure  
**Policy:** Policy 22: Telecommunications & Utilities Infrastructure  

**Tests of Soundness:**  

|  |  |  |  |

**Comment:**  
We support this Criterion which should help to ensure that any new telecommunications or utilities infrastructure does not detract from the significance of the Borough’s heritage assets.  

**Summary:**  
'Sound'. We support this Criterion which should help to ensure that any new telecommunications or utilities infrastructure does not detract from the significance of the Borough’s heritage assets.  

**Response:**  
Support welcomed
<table>
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<tr>
<th>Tests of Soundness:</th>
<th>Positively prepared</th>
<th>Effective</th>
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<tbody>
<tr>
<td></td>
<td>Justified</td>
<td>Consistent with national</td>
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Comment:

In F) after 'visual' add 'and landscape'

Summary:

In F) after 'visual' add 'and landscape'

Response:

The proposed additional word ('landscape') would not add anything to the Policy.
This policy requires all new housing and commercial developments to provide a connection to the Superfast Broadband network, unless it can be expressly demonstrated that this is not possible. Paragraph 112 of the Framework (2019) states that local planning authorities should seek support for the expansion of electronic communications networks, but it does not in any way preclude development that cannot be connected to such networks. Whilst Gladman recognise the important role that digital infrastructure plays, we would remind the Council that provision of access to such infrastructure is not within the direct control of developers. It must be recognised in the policy or indeed any supporting text, that ultimately, it is service providers who can provide and authorise access to such infrastructure.
Guidelines when working near NGETT assets:

- A sense of place

National Grid Assets Please find attached in:
Appendix 2 provides maps of the sites referenced above in relation to Utilities Infrastructure

Further Advice National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition, the following publications are available from the National Grid website or by contacting us at the address overleaf:  


Appendices - National Grid Assets Please find attached in:  
Appendix 1 provides a map of the National Grid network across the UK. Appendix 2 provides maps of the sites referenced above in relation to the affected National Grid Transmission assets outlined above. (SEE EMAIL FOR Appendices)

Summary:

National Grid seeks to encourage high quality and well-planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced ‘A Sense of Place’ guidelines, which provide detail on how to develop near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines. Potential developers of these sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. The relocation of existing high voltage overhead lines will only be considered for projects of national importance which has been identified as such by central government. National Grid requests that any High-Pressure Gas Pipelines are taken into account when site options are developed in more detail. These pipelines form an essential part of the national gas transmission system and National Grid’s approach is always to seek to leave our existing transmission pipelines in situ. Please refer to the Health and Safety Executive (HSE) in the first instance. National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid easement strip, and a deed of consent is required for any crossing of the easement. In the first instance please consider checking with the Land Registry for the development area. If you require any further information in relation to the above and/or if you would like to check if National Grid’s transmission networks may be affected by your works, please contact National Grid’s Plant Protection team via plantprotection@nationalgrid.com or visit the website: https://www.linesearchbeforeudig.co.uk/

Further Advice National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition, the following publications are available from the National Grid website or by contacting us at the address overleaf:  


Appendices - National Grid Assets Please find attached in:  
Appendix 1 provides a map of the National Grid network across the UK. Appendix 2 provides maps of the sites referenced above in relation to the affected National Grid Transmission assets outlined above. (SEE EMAIL FOR Appendices)
Response:

Kentucky Fried Chicken (Great Britain) Limited

Because evidence has not yet been provided in support of the draft policy and any that may be provided prior to exam will need to be tested.

Area: Chapter 8: Retail & Town Centres
Policy: Policy 25: Food & Drink Uses

Tests of Soundness: Positively prepared Justified
Effective Consistent with national

Comment:

POSITIVELY PREPARED The draft policy in effect assesses the requirement for hot food takeaways within 400 metres of a school, sixth form college, community centre or playground to be zero. However, it does this without reference to how many may already be present, the effect either of those or of any reduction. Specifically, in the latter regard, no evidence of a distance (if any) at which an effect may occur is provided. Furthermore, no assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic (particularly retail and footfall) or environmental impacts of that might be. Consequently, it is not possible to balance these impacts and the development requirement has not been objectively assessed. The policy is negative in its assumptions, using the concept of 'unhealthy food', which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle, and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food. JUSTIFIED Food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Classes A3 and A1, such as restaurants, cafes, coffee or sandwich shops, bakeries or, simply, supermarkets, so that focussing on Class A5 uses is both unhelpful and unfair. There is no evidence for a causal link between the incidence of obesity and proximity of hot food takeaways to school, sixth form college, community centre or playground and only limited evidence of any correlation at all, so it is unclear how refusing planning permission for hot food takeaways within 400 metres of such locations could ever be justified. EFFECTIVE Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods, however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not. We suggest that it is better to rely on objective evidence in a retail study to set proportions of hot food takeaways (and other main town centre uses) in order to ensure a healthy retail balance (and therefore footfall, which implies active travel), but also any concomitant public health benefits. Such an approach could be extended beyond centres. On a practical point, there is a significant difficulty in using distance radii in that it takes no account of real barriers, physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400-metre walk away. It is far better to use real walk isochrones. CONSISTENT WITH NATIONAL POLICY We consider no regard has been had to national policy and advice in preparing Policy 25 (C and last paragraph) because no NPPF policies refer to dietary issues. The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are walkable to local facilities and to public transport to other facilities. Since July 2017, PPG part 53 paragraph 6 has suggested local planning authorities might consider policies, which limit the proliferation of certain use classes in identified areas. It focuses on proliferation, does not specify which use classes and is clearly intended to be area-based. Whilst it suggests that regard could be had to proximity to schools, it omits of what. Similarly, it refers only to overconcentration and clustering of "certain use classes" and high levels of obesity "in specific locations". It leaves planners to evidence any such policy. Where no evidence that the proximity of hot food takeaways is having an adverse effect over and above proximity to any other use where food can be purchased, then a policy that controls this is not consistent. PROPOSED CHANGE Detail and justify what is meant by "clustering or proliferation" within the policy, specifically setting out why the national average is relevant or significant in terms of outcomes, and delete the last paragraph of the policy.

Summary:

Policy 25 in effect assesses the requirement for hot food takeaways within 400m to be zero. Although does this without reference to how many are already present. No assessment has been made to how many would be refused and the resultant impact. The policy is also negative in its assumptions using 'unhealthy food' as an unhelpful isolation of the people. There is no evidence to link between the incidence of obesity and proximity of hot food takeaway so unclear of justification. Takes no account of real barriers canal, roads within radius. No regard for national policy and advice in Policy 25 (c and last paragraph) as no policies refer to dietary issues.

Response:

Doncaster's Local Plan aims to have a healthier thread throughout the whole Local Plan and this is just one policy which can contribute to reducing obesity levels and supporting people in making healthy choices in Doncaster. Doncaster's Planning team have taken the opportunity to work alongside Doncaster's Public Health colleagues who have been involved in the development of the Local Plan. New opportunities to improve the health and well-being and health inequalities of our residents has resulted in the inclusion of a new aim, chapter and policies with a specific policy and evidence review on Hot Food Takeaways. Specific evidence has been published https://www.doncaster.gov.uk/services/planning/retail-and-leisure-study

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1 Introduction 1.1 Planware Ltd have considered Policy 25 - Food and Drink Uses with regard to the principles set out within the Framework. We fully support the policy’s aim of promoting healthier living and tackling obesity. However, the proposed policy approach is unsound and fails to provide an evidence-based way of achieving the policy’s objective. It has also been found unsound by several planning inspectors. It is too restrictive and prevents local planning authorities from pursuing more positive policy approaches. The London Borough of Waltham Forest has had such policy in place for over a decade and its application has proven ineffective in tackling obesity. 1.2 Within these broad points we have the following policy objections to Policy 25: A. The 400m exclusion zone is inconsistent with national planning policy. B. The policy is inconsistent, discriminatory and disproportionate. C. The 400m exclusion zone is not justified by any evidence. D. Examination of other plans have found similar policy approaches to be unsound. E. There needs to be some exploration into policies that are more positive, have a reputable evidence base and that comply with the Framework. F. Point C restricting over-concentration also fails to comply with the Framework. 1.3 In summary, McDonald’s consider there is no sound justification for a policy such as Policy 25, which imposes a blanket ban on restaurants that include an element of AS use within 400-metres from a secondary school, sixth form college, community centre or playground unless the opening hours are restricted until after 1700 on weekdays. The draft policy also includes an over-concentration restriction. Policy 25 should therefore be deleted from the policy if these two detrimental restrictions remain. 1.4 However, as stated in the opening paragraph, Planware Ltd supports the aim of promoting healthier living and tackling obesity. We acknowledge that planning can have a role in furthering these objectives. We would therefore welcome and support any studies between obesity and their relationship with development proposals, including examination of how new development can best support healthier lifestyles and tackling the obesity crisis. When a cogent evidence base has been assembled, this can then inform any appropriate policy response. This has still not emerged. 1.5 Given the lack of any clear agreement between experts on the indices of obesity or poor health, this evidence is a necessary part of this objection by way of background. This will all be highlighted in the below text. 2 Contribution of McDonald’s UK to the United Kingdom 2.1 This section of the objection sets out some background context relating to McDonald’s own business, its contribution to United Kingdom, and information on the nutritional value and healthy options of the food that it offers in its restaurants. This evidence is relevant to understanding the unjustified impacts of the 400m blanket ban and over-concentration (Point C) restriction proposed under Policy 25. Economic and Environmental Benefits 2.2 The first store in the United Kingdom was first opened in 1974 in Woolwich, London. The store is still opened and was interestingly the 3,000th store across the world. 2.3 With over 36,000 McDonald’s worldwide, it operates in over 100 countries and territories. Approximately 120,000 people are employed by McDonald’s UK, compared to just over 1 million employees worldwide. 2.4 McDonald’s business and its franchisees have become important members of communities in the United Kingdom: investing in skills and developing their employees, supporting local causes and getting kids into football. 2.5 Nationally, the company operates from over 1,300 restaurants in the UK. Over 80% of restaurants are operated as local businesses by franchisees, that’s around 1,100 franchised restaurants. 2.6 McDonald’s is one of few global businesses that continues to anchor itself in high streets and town centres across the United Kingdom. Not just serving the general public but creating jobs and seeking to improve the communities around them. 2.7 All of McDonald’s restaurants conduct litter picks covering an area of at least 100 metres around the site, at least three times a day, picking up all litter, not just McDonald’s packaging. 2.8 McDonald’s is a founding member of the anti-littering campaign, Love Where You Live. As part of this, our restaurants regularly organise local community litter picks. The campaign has grown and in 2017, 430 events took place across the UK with around 10,000 volunteers involved. Since the campaign started, 2,600 events have taken place with around 80,000 volunteers involved. 2.9 McDonald’s restaurants are operated sustainably. For example, their non-franchised restaurants use 100% renewable energy, combining wind and solar and use 100% LED lighting which means we use 50% less energy than fluorescent lighting. All used cooking oil is converted into biodiesel for use by McDonald’s delivery lorries. Their entire fleet of lorries runs on biodiesel, 40% of which comes from McDonald’s own business, its contribution to United Kingdom, and information on the nutritional value and healthy options of the food that it offers in its restaurants. This creates over 7,500 tonnes fewer CO2 emissions than ultra-sulphur diesel. 2.10 All new McDonald’s restaurants in the United Kingdom are fully accessible and they are working toward delivering this same standard for all existing restaurants. 2.11 Many of McDonald’s restaurants toilets are open to all members of the public. They are one of few night time premises that offer this service and, given the fact they are located in some of the busiest parts of the country, McDonald’s are helping to keep the United Kingdom clean. Nutritional Value of Food and Healthy Options 2.13 McDonald’s offers a wide range of different food at its restaurants. 2.14 Nutritional information is easy to access and made available online, and at the point of sale on advertising boards, as well as in tray inserts. Information is given on calorie content and key nutritional aspects such as salt, fat and sugar content. This enables an individual is able to identify and purchase food items and combinations that fit in with their individualised calorie or nutritional requirements. 2.15 The menu offer includes a range of lower calorie options, some of which are set out in the table below. 2.16 The restaurants now suggest meal bundles to assist customers in making informed, healthier choices. McDonald’s have suggested “favourites” meal bundles, across the breakfast and main menu that enable the choice of low-calorie options to be made even more easily. These 3-piece meal combinations will all be under 400kcal on the breakfast menu, and all under 600kcal on the main menu (with many options under 400kcal on the main menu also), and all individual items on these menu bundles with be either green (low) or amber (medium) on the Food Standards Agency traffic light system for food labelling. 2.17 Examples of low calorie (less than 400kcal) breakfast options (where no single item is red for FSA) include any combination of the following: - Egg & Cheese McMuffin / Egg & cheese snack wrap / bagel with Philadelphia / porridge; with fruit bag; and a medium black coffee, or espresso or regular tea or water. 2.18
Examples of low calorie (less than 600kcal) main menu options (where no single item is red for FSA) are included in the table below. Some 90% of our standard menu is under 500 calories. Main: - The Garlic Mayo Chicken One - grilled wrap Side Options: - Fruit Bag - Pineapple Stick - Carrot Sticks - Side Salad with Fajita Dressing Options: - Diet Drink - Water - Medium Black Coffee - Regular Tea Total Calories *varies depending on side & drink choice: - Between 379-390kcal Main: - The Sweet Chilli Chicken One - grilled wrap Side Options: - Fruit Bag - Pineapple Stick - Carrot Sticks - Side Salad with Fajita Dressing Options: - Diet Drink - Water - Regular Tea - Medium Black Coffee Total Calories *varies depending on side & drink choice: - Between 338-348kcal Main: - Grilled Chicken & Salad with Fajita Dressing Side Options: - Fruit Bag - Pineapple Stick - Carrot Sticks Drinks Options: - Diet Drink - Water - Regular Tea - Medium Black Coffee Total Calories *varies depending on side & drink choice: - 238-247kcal 2.19 Those specifically wanting a meal low in either fat, salt, or sugar, can tailor their choices accordingly. Any combination of menu items offered at McDonald’s can be eaten as part of a calorie controlled nutritionally balanced diet. Customers alternatively eat anything from the menu allowing for this within their overall daily, or weekly nutritional requirements. Quality of Ingredients and Cooking Methods 2.20 McDonald’s are always transparent about both their ingredients and their processes in an attempt to achieve maximum quality. McDonald’s chicken nuggets are made from 100% chicken breast meat, their burgers are made from whole cuts of British and Irish beef. Coffee is fair trade and milk is organic. McDonald’s want their customers to be assured about what they are consuming. The 'Good to Know' section on the McDonald’s website - https://www.mcdonalds.com/gb/en-gb/good-to-know/about-our-food.html - provides a range of information about the processes and the origin of their produce. Menu Improvement and Reformulation 2.21 McDonald’s is actively and continuously engaged in menu reformulation to give customers a range of healthier options. Louise Hickmott, Head of Nutrition, at McDonald’s UK, has provided a letter giving examples of the steps that have been taken in recent years. The information is summarised below. 2.22 In recent years McDonald’s has made great efforts to reduce fat, salt and sugar content across their menu. - 89% of their core food and drink menu now contains less than 500 kcal. - Supersize options were removed from their menu in 2004. - 72% of the Happy Meal menus are classified as not high in fat, salt or sugar according to the Government’s nutrient profile model. - Since October 2015, 50% of the options on the drinks fountain have been no added sugar (Diet Coke, Coke Zero and Sprite Z). - Recent years have seen the introduction of new items, offering more choice that has included porridge, salads, grilled chicken wraps, carrot sticks, fruit bags including apple and grape, pineapple sticks, and melon chunks, as well as orange juice, mineral water and organic semi-skimmed milk; - Customers can swap fries for fruit bags, carrot sticks or salad on the main menu, or the hashbrown for a fruit bag or carrot sticks on the breakfast menu, at no additional cost; - In 2014, McDonald’s introduced “Free Fruit Fridays” resulting in 3.7 million portions of fruit being handed out. Since then, discounted fruit is now available with every Happy Meal. Fat 2.23 A recent meta-analysis and systematic review of 72 studies (45 cohort studies and 27 controlled trials) demonstrated that with the exception of Trans Fatty Acids (TFA), which are associated with increased coronary disease risk, there was no evidence to suggest that saturated fat increases the risk of coronary disease, or that polyunsaturated fats have a cardio-protective effect, which is in contrast to current dietary recommendations (Chowdrey et al, 2014). 2.24 However, UK guidelines currently remain unchanged; men should consume no more than 30g of saturated fat per day, and women no more than 20g per day (NHS Choices, 2013). It should be remembered that all fats are calorie dense (9kcal/g) and that eating too much saturated fat will increase the likelihood of weight gain and therefore obesity, indirectly increasing the risk of coronary heart disease, among other co-morbidities. 2.25 What have McDonald’s done? - Reduced the saturated fat content of the cooking oil by 83%; - Signed up to the Trans Fats pledge as part of the Government’s “Responsibility Deal”; - The cooking oil has been formulated to form a blend of rapeseed and sunflower oils to reduce levels of TFA to the lowest possible level; - They have completely removed hydrogenated fats from the vegetable oils; - Reduced the total fat in the milkshakes by 32% per serving since 2010; - Organic semi-skimmed milk is used in tea/coffee beverages and in Happy Meal milk bottles, with lower saturated fat levels compared with full fat varieties. Sugar 2.26 Dietary carbohydrates include sugars, starches and fibre, and each has approximately 4kcals/g. 2.27 The Scientific Advisory Commission on Nutrition (SACN) currently recommends that approximately 50% of total dietary energy intake should be from carbohydrates (SACN Report, 2015). In 2015 SACN recommended that the dietary reference value for fibre intake in adults be increased to 30g/day (proportionally lower in children) and that the average intake of “free sugars” (what used to be referred to as non-milk extrinsic sugars) should not exceed 5% of total dietary energy, which was in keeping with the World Health Organisation (WHO) recommendations. 2.28 Current average intake of free sugars far exceeds current recommendations, and excess intake is associated with dental issues and excess calorie intake which can lead to weight gain and obesity. 2.29 Over the last 10 years McDonald’s reformulation work has resulted in 787 tonnes less sugar across their menu in 2017 versus 2007. What have McDonald’s done? - Reducing the sugar in our promotional buns, this removed 0.6 tonnes of sugar - Our Sweet Chilli Sauce has been reformulated to reduce sugar by 14% this equates to 155 tonnes of sugar removed - Our Festive Dip has removed 4 tonnes of sugar - Our famous McChicken Sandwich Sauce has reduced in sugar 45% - Our Tomato Ketchup has reduced in sugar by 20% which equates to 544 tonnes of sugar removed from the system - Our Chucky Salsa has reduced in sugar by 28% - Since 2016 we have reduced the sugar content of Fanta by 54% - The Toffee Syrup in our Toffee Latte has been reformulated to remove 20% of the sugar - We have reformulated our Frozen Strawberry Lemonade this has led to 8% sugar reduction per drink Salt 2.30 A number of health-related conditions are caused by, or exacerbated by, a high salt diet. The strongest evidence links high salt intake to hypertension, stroke and heart disease, although it is also linked with kidney disease, obesity and stomach cancer (Action on Salt website). 2.31 Salt is often added to food for either taste or as a preservative, and in small quantities it can be useful. Adults in the UK are advised not to exceed 6g of salt per day, but the average intake at a population level is consistently higher than this. 2.32 Salt does not directly lead to obesity; however, it does lead to increased thirst, and not everyone drinks water or calorie-free “diet” beverages. If our thirst increases and leads to increased consumption of calories from extra fluid intake, then this may lead to increased weight and obesity. 31% of fluid drunk by 4-18-year-old children is sugary soft drinks (He FJ et al, 2008), which has been shown to be related to childhood obesity (Ludwig DS et al, 2001). 2.33 What have McDonald’s done? - The salt content across the UK menu has been reduced by nearly 35% since 2005; - Customers can ask for their food to be “salt-free”; - The salt content by calories has been reduced by 17% since 2005 for McDonald’s and the Happy Meal menu contains 19% less salt than in 2006 - Chicken McNuggets contain 52% less salt than in 2003. 2.34 The process continues. McDonald’s have recently made the following changes to their menu - Making water the default drink in the Happy Meals; - Making it easier for people to understand the existence of a wide range of under 400 and 600 calorie meal options that are available. Third Party Opinions of McDonald’s 2.35 McDonald’s regularly receive supportive comments from independent third parties. 2.36 Professor Chris Elliott, of the Department for Environment, Food & Rural Affairs’ independent Elliott Review into the integrity and assurance of food supply networks: interim report, December 2013: “Each supply chain is unique, showing that there is no single approach to assuring supply chain integrity. The review has seen many examples of good industry practice that give cause for optimism. There is not space within this final report to reference all the good industry practices but those that have stood out include McDonald’s and Morrisons.” 2.37 Jamie Oliver, the TV chef, food writer and campaigner speaking in January 2016 at the Andre Simon Food & Drink Book Awards to the Press Association: “Everyone always liked to poke at McDonald’s. McDonald’s has been doing more than most and smallest sized businesses for the last 10 years. Fact. But no one wants to talk about it. And I don’t work for them. I’m just saying they’ve been doing it - 100% organic milk, free range eggs, looking at their British and Irish beef.” 2.38 Raymond Blanc, the TV chef and food writer, speaking in 2014, after having presented McDonald’s UK with the Sustainable Restaurant Association’s Sustainability Hero award: “I was amazed. All their eggs are free-range; all their pork is free-range; all their beef is free-range. [They show that] the fast-food business could change for the better. They’re supporting thousands of British farms and saving energy and waste
by doing so. "I was as excited as if you had told me there were 20 new three-star Michelin restaurants in London or Manchester." 2.39 Marco Pierre White, TV chef and food writer, speaking in 2007: "McDonald's offers better food than most restaurants and the general criticism of the company is very unfair. "Their eggs are free range and the beef is from Ireland, but you never hear about that. You have to look at whether restaurants offer value for money, and they offer excellent value." These comments below represent independent opinions: Supporting Active and Healthy Lifestyles among Employees and Local Communities 2.40 McDonald’s is focused on its people and is proud to have been recognised for being a great employer. 2.41 The judges specifically recognised our approach to Guaranteed Hours contracts. - The Times Top 100 Graduate Employers - the Times Top 100 Graduate Employers is the definitive annual guide to Britain’s most-sought-after employers of graduates. - Investors in People - Investors in People accreditation means we join a community of over 15,000 organisations across 75 countries worldwide and it is recognised as the sign of a great employer. - School leavers Top 100 Employers - McDonald's UK has been certified as one of Britain's most popular employers for school leavers in 2017, for the third consecutive year. An award voted for by 15-18 year olds in the UK. 2.41 In April 2017, McDonald's began to offer employees the choice between flexible or fixed contracts with minimum guaranteed hours. This followed trials in 23 restaurants across the country in a combination of company owned and franchised restaurants. All of McDonald's employees have been offered this choice and around 80% have selected to stay on flexible contracts. 2.42 Over the past 15 years, McDonald’s has been proud partners with the four UK football associations: The English Football Association; The Scottish Football Association; The Football Association of Wales; and The Irish Football Association. 2.43 This partnership has seen McDonald's support over one million players and volunteers. In London since 2014, more than 1,000 people have attended our Community Football Days and we have distributed 3,328 kits to accredited teams in the Capital. Of the 171 McDonald's restaurants within the M25, approximately 88 are twinned and actively supporting a local football club. This serves as an example of the company’s willingness to confront the obesity crisis with a multitude of different approaches. 2.44 We do this work because increasing standards will ultimately create a better experience for young footballers, leading to increased participation and retention of children and young people in sport. 2.45 McDonald's Community Football programme helps to increase participation at all levels. They remain absolutely committed to it and are in the final stages of planning their programme for future years. Marketing 2.45 As a business McDonald’s are committed to ensuring marketing will continue to be responsible and will be used as a positive influence to help our customers make more informed choices. 2.47 McDonald’s recognise that marketing has a part to play in influencing customers’ choices. They comply, and go beyond, the UK’s stringent regulations on marketing to children and use their own marketing to help families understand more about the range of food options the company offer. 2.48 McDonald’s never market products classified as high in fat, salt or sugar to children in any media channel, at any time of the day. They are committed to ensuring that their marketing is always responsible as well as informative, and that it reinforces positive food messages. 2.49 In addition, we go beyond the regulations in a lot of cases. For example, when advertising a Happy Meal, we only ever do so with items such as carrot sticks, a fruit bar, milk or water to ensure we are not marketing HFSS food to children. We have done this voluntarily since 2007. Summary 2.50 In the light of the above it is clear that McDonald’s restaurants offer the district considerable and substantial economic benefits, are supportive of active and healthy lifestyles, and enable customers to make informed, healthy choices from the wide-ranging menu options available. It is important that this is acknowledged, given the assumption in the draft Policy 25 that all A5 uses should be restricted within 400m of locations of secondary schools, sixth form colleges, community centres or playgrounds, and areas that are deemed over-concentrated. This based on the assumption that it is having major health impacts on children and people living in areas clustered with a high number of A5 uses. Given the policy aim - which McDonald’s supports - of promoting healthier lifestyles and tackling obesity, adequate parameters/thresholds need to be contained within such a policy. 2.51 We turn now to the main points of the objection. 3 The 400m Exclusion Zone is Inconsistent with National Policy Introduction 3.1 This section of the objection considers the proposed policy against national policy. The lack of evidence to support the policy is considered in the next section. 3.2 National policy contains no support for a policy approach containing a blanket ban or exclusion zone for A5 (or indeed any other) uses. Such an approach conflicts sharply with central planks of Government policy such as the need to plan positively to support economic development, and in particular the sequential approach that seeks to steer town centre uses - which include A5 uses - to town centres. Practical Impacts 3.4 The practical impact on an 400m exclusion zone of around secondary schools, sixth form colleges, communities or playgrounds unless the opening hours are restricted until 17:00 on weekdays is unsound. Although draft Policy 25 does allow A5 use within 400m of the listed educational facilities, it is felt that this in turn will create inactive daytime shopping frontages. 3.5 Retailers such as McDonald’s operate throughout the day, serving the wider community with Breakfast and Lunch. Such restrictions would apply be overly restrictive to such a business model. Whilst this wouldn’t affect a smaller takeaway which traditionally opens in the evening, this would have a detrimental impact on businesses such as McDonald’s. 3.6 McDonald’s employ large numbers of staff. Such a restriction would limit the number of staff that could be employed and the hours offered. 3.7 Consideration should be given to school restrictions on letting students leave at lunchtimes. This is a key consideration as a restriction would be unsound given students are not allowed out at lunchtimes. 3.8 To restrict the proximity of sixth form colleges is unjustified. Students attending such facilities are 17-18 years old and are considered young adults and old enough to make their own choices. In addition, students will be old enough to drive and such a restriction would have little to no impact, making its inclusion unsound and overly restrictive on land uses. 3.9 The Framework does not support the use of planning to limit people’s dietary choices. In addition to this, other A class uses can provide unhealthy products, therefore, there is limited justification for the policy to focus exclusively upon hot food takeaways (A5). 3.10 The local policy team do not appear to have fully assessed the potential impact of the policy. 2. It is suggested the policy is an unnecessary blanket ban against A5 uses located in areas where reasons for them to locate. This goes against national planning policy in that it contradicts paragraph 80 of the framework. Conflict with National Policy 3.11 Restricting both the concentration and the location of new A5 proposals (and the like) within London is not a positive approach to planning. The Framework “foreword” states that sustainable development is about positive growth, making economic; environmental; and social progress, for this and future generations. 3.12 The suggested restrictions within draft Policy 25, takes an ambiguous view of A5 uses in relation to the proximity of secondary schools, sixth form colleges, community centres or playgrounds. The policy would apply an over-generic approach to restrict development with little sound planning reasoning or planning justification. This is contrary to paragraph 11 of the Framework that advises authorities to positively seek opportunities to meet development needs of their area. 3.13 No map is provided to indicate the land use impacts and restrictions such an exclusion zone would have. By introducing such an opening time restriction would make any sites unsuitable and as such would push businesses such as McDonald's outside of these exclusion zones. Without a map it is impossible to assess the impacts of the proposed policy. 3.14 Thus, is consistent with paragraph 80-81 of the Framework. 3.15 Para 80 states: “Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.” Para 81 states: Planning policies should: “a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local
Industrial Strategies and other local policies for economic development and regeneration; b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances. 3.16 As explained later in this objection, there is a lack of evidence to demonstrate the link between fast food, school proximity and obesity. The need for evidence is emphasised in paragraph 3.1 of the Framework that states that each local plan should be based on adequate, up-to-date and relevant evidence. Neither the policy nor the supporting text addreses this point. Policy needs to be based on evidence. 3.17 The policy is likely to be very damaging to the district's economy due to the fact that it is restricting hot food takeaways to such an extreme level without any regard to the local area or the economy. 3.18 There is also conflict with the sequential test requirements, which has its own locational requirements. Paragraph 86 of the Framework is clear in its expectation that an up to date local plan will adopt the sequential approach, and that local authorities should "require" applications for main town centre uses to locate in town centres. The sequential approach would be seriously undermined by the approach proposed in the Calderdale Local Plan. 3.19 The Framework cannot be interpreted to provide generic restrictions on a particular use class. There is no basis for such a blanket approach in the Framework or Planning Practice Guidance. In fact, the Planning Practice Guidance emphasises that planning authorities should look at the specifics of a particular proposal and seek to promote opportunity rather than impose blanket restrictions on particular kinds of development. In the section on "Health and Wellbeing": 3.20 Paragraph: 002 (Reference ID: 53-002-20140306) states that in making plans local planning authorities should ensure that: "opportunities for healthy lifestyles have been considered (eg. planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity, and promotes access to healthier food, high quality open spaces, green infrastructure and opportunities for play, sport and recreation)." 3.21 Paragraph: 006 (Reference ID: 53-006-20170728) says that a range of criteria should be taken into account, including not just proximity to schools but also wider impacts. It does not support a blanket exclusion zone. Importantly, the criteria listed are introduced by the earlier text which states: "Local planning authorities can have a role in enabling a healthier environment by supporting opportunities for communities to access a wide range of healthier food production and consumption choices." 3.22 Paragraph: 004 (Reference ID: 53-004-20140306) advises that a Health Impact Assessment should be considered in planning decision making, and that the scope for planning conditions and a section 106 obligation to address issues should also be taken into account. 3.23 The above guidance serves to emphasise why it is important to consider particular proposals as a whole, rather than adopting a blunt approach that treats all proposals that include an A5 use as being the same. 3.24 The Policy is inconsistent, discriminatory and disproportionate; therefore, Point C and the 400-metre exclusion zone should be deleted from draft Policy 25. 3.25 The policy aims to address obesity and unhealthy eating but instead simply restricts new development that comprises an element of A5 use. Yet A1 retail outlets and A3 food and drink uses can also sell food that is high in calories, fat, salt and sugar, and low in fibre, fruit and vegetables, and hot food from an A3 unit can be delivered to a wide range of locations, including schools. This means that the policy takes an inconsistent approach towards new development that sells food and discriminates against operations with an A5 use. It also means that the policy has a disproportionate effect on operations with an A5 use. 3.26 The test of soundness requires that the policy approach is "justified", which in turn means that it should be the most appropriate strategy when considered against the reasonable alternatives and based on proportionate evidence (paragraph 35 of the Framework). 3.27 Given the objectives of the policy, it ought to apply equally to all relevant food retailers. 3.28 The table below shows the kind of high calorie, low nutritional value food that can be purchased from a typical A1 high street retailer at relatively low cost. It is contrasted with the kind of purchase that could be made at a McDonald's. The evidence provided at Appendix 1 confirms that 70% of purchases by students in the school fringe are purchased in non-A5 shop. (note 1 The School Fringe: What Pupils Buy and Eat From Shops Surrounding Secondary Schools, July 2008, Sarah Sinclair and Professor J T Winkler, Nutrition Policy Unit of London Metropolitan University.) Company: McDonalds Snack or meal: Apple and Grape fruit bag Salt (g): 0.0 Fat (g): 0.1 Calories (kcal): 46 Price (#): 49p Company: McDonalds Snack or meal: Garlic Mayo chicken wrap Salt (g): 1.3 Fat (g): 11.0 Calories (kcal): 345 Price (#): 2.99 Company: Greggs Snack or meal: Sausage Roll Salt (g): 1.6 Fat (g): 22.0 Calories (kcal): 317 Price (#): 90p Company: Greggs Snack or meal: Cheese and Onion bake Salt (g): 1.6 Fat (g): 30.0 Calories (kcal): 436 Price (#): 1.35 Company: Costa Coffee Snack or meal: Nutty flapjack Salt (g): 0.1 Fat (g): 23.2 Calories (kcal): 425 Price (#): 1.70 Company: Costa Coffee Snack or meal: Ham and Cheese panini Salt (g): 2.5 Fat (g): 13.5 Calories (kcal): 427 Price (#): 3.95 3.29 If the policy is to be based on Use Classes, then the proposed policy should place restrictions on other use classes in addition to class A5. In fact, by restricting A5 uses only, the policy would encourage food purchases at other locations. 3.30 Finally, it is important that for the majority of days in the year (weekends and school holidays combined) schools are not open at all. Research by Professor Peter Dolton of Royal Holloway College states that "At least 50% of the days in a year kids don't go to school if we count weekends and holidays and absence. They are only there for 6 hours and all but 1 are lessons. So only around 2-3% of the time can [children] get fast food at school." (note 2 Peter Dolton, Royal Holloway College, University of London & Centre for Economic Performance, London School of Economics, Childhood Obesity in the UK: Is Fast Food a Factor? http://www.made.org.uk/images/uploads/2_Prot_P_Dolton_presentation.ppt) 3.31 For the minority of the year when schools are open, it is important to recognise that many schools have rules preventing children from leaving the school grounds during the school day, and in any event proximity to schools has no conceivable relevance outside of the particular times when children are travelling to or from school in circumstances where their route takes them past the development proposal. 3.32 The policy's blanket approach fails to acknowledge that the opportunity for children to access A5 development as part of a school day is extremely limited. The complete ban is wholly disproportionate to the circumstances when the concern underlying the policy might arise. Only limited purchases of food are made at A5 uses on journeys to and from school. Further details are set out in Appendix 2. 4 The Policy is Not Justified because of a Lack of an Evidence Base 4.1 The test of soundness requires policy to be evidence based. There is no evidence of any causal link between provision of or access to food within 400m of schools and increases in obesity or poor health outcomes. In fact, the studies that have considered whether such a causal connection exists have found none. 4.2 Public Health England (PHE), which is part of the Department of Health and Social Care, expressly accept that the argument for the value of restricting the growth in fast food outlets is only "theoretical" based on the "unavoidable lack of evidence that can demonstrate a causal link between actions and outcomes." (note 3 Public Health England & LGA, Healthy people, healthy places briefing: Obesity and the environment: regulating the growth of fast food outlets, page 5, November 2013) 4.3 A systematic review of the existing evidence base by Oxford University (December 2013), funded by the NHS and the British Heart Foundation 'did not find strong evidence at this time to justify policies related to regulating the food environments around schools.' It instead highlighted the need to 'develop a higher quality evidence base'. (note 4 J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Unit of Population Health, University of Oxford, page 13, 11th December 2013. A systematic review of the influence of the retail food environment around schools on obesity-related outcomes.) 4.4 The range of US and UK studies used to support many beliefs about obesity, including the belief that the availability of fast food outlets increased obesity, was comprehensively reviewed in papers co-written by 19 leading scientists in the field of nutrition, public health, obesity and medicine. Their paper "Weighing the Evidence of Common Beliefs in Obesity Research" (published in the Critical Review of Food, Science and Nutrition (Crit Rev Food Sci Nutr. 2015 December 6; 55(14) 2014-2053) found that the current scientific evidence did not support the contention that the lack of fresh food outlets or the increased number of takeaway outlets caused increased obesity (see pp16-17 of the report). 4.5 The draft policy refers to the views of "a wide range of
health experts” but there appears to have been no critical assessment of what these views are based on and whether the underlying evidence supports those views or the proposed policy approach. It does not. 4.6 In this context, it is important to consider the evidence from Waltham Forest which introduced a school proximity policy in 2008 - about a decade ago. Over that period, the Public Health England data for the Borough shows that there has been no discernible impact on childhood obesity rates - with these actually worsening in recent years. The borough’s Health Profile for 2017 records childhood obesity (year 6) at 26.1% up from 20.3% in 2012, the year London hosted the Olympic Games. 4.7 While it is accepted that the causes of obesity are complex, it is clear that the exclusion zone policy had no discernible effect in Waltham Forest. It is clear that more research and investigation is needed before such a policy approach can be justified by evidence. 5 Similar Policies Have Been Found Unsound When Promoted in Other Plans 5.1 The lack of evidence between proximity of takeaways to schools and its impact on obesity has been confirmed in a number of planning decisions. 5.2 In South Ribble the Planning Inspectorate raised concerns about a similar 400m school proximity restriction on fast food, stating ‘the evidence base does not adequately justify the need for such a policy’, and due to the lack of information, it is impossible to ‘assess their likely impact on the town, district or local centres’. (note 5 Letter to South Ribble Borough Council, 29th April 2013, from Susan Heywood, Senior Housing & Planning Inspector, The Planning Inspectorate.) 5.3 Similarly, research by Brighton & Hove concluded that ‘the greatest influence over whether students choose to access unhealthy food is the policy of the individual schools regarding allowing students to leave school premises during the day’. (note 6 Brighton & Hove City Council & NHS Sussex, Hot-food takeaways near schools; An impact study on takeaways near secondary schools in Brighton and Hove, page 30, September 2011) 5.4 The recent Inspectors response to the London Borough of Croydon (January 2018) regarding a similar prohibition on A5 uses, (where a similar campaign to persuade takeaway proprietors to adopt healthy food options existed) confirmed that the councils own ‘healthy’ plans would be stymied by the proposed policy, as would purveyors of less healthy food. The policy failed to distinguish between healthy and unhealthy takeaway food, and “confounds its own efforts to improve healthiness of the food provided by takeaway outlets” and failed to “address the demand for the provision of convenience food”. The Inspector concluded that because the reasons for the policy do not withstand scrutiny, they must be regarded as unsound. 5.5 The inspector at Nottingham City Council stated "There is insufficient evidence to support the link between childhood obesity and the concentration or siting of A3, A4 and A5 uses within 400m of a secondary school to justify the criterion of policy LS1 that proposals for A3, A4 and A5 uses will not be supported outside established centres if they are located within 400m of a secondary school unless it can be clearly demonstrated that the proposal will not have a negative impact on health and well-being the criterion and justification should therefore be deleted/amended". 5.6 The inspector at Rotherham stated “Policy SP25 sets out various criteria against which proposals for hot food takeaways will be assessed. One of the criteria is designed to prevent hot food takeaways within 800 metres of a primary school, secondary school or college when the proposed site is outside a defined town, district or local centres. Having carefully considered the material before me and the discussion at the Hearing I do not consider there is sufficient local evidence to demonstrate a causal link between the proximity of hot food takeaways to schools and colleges and levels of childhood obesity. Although I accept that levels of childhood obesity need to be tackled by both local and national initiatives I do not consider there are sufficient grounds at the present time to include this particular aspect of land use policy in the RSPS". 5.7 In Guildford, the inspector stated “Finally, the submitted Plan contains a requirement common to Policy E7 Guildford town centre, E8 District Centres and E9 Local Centres and isolated retail units that resists proposals for new hot food takeaways within 500 metres of schools. However, the evidence indicates that childhood obesity in Guildford is lower than the average for England. Childhood obesity may be a product of a number of factors, not necessarily attributable to takeaway food; takeaways often sell salads as well as nutritious foods; not all kinds of takeaway food are bought by children; children have traditionally resorted to shops selling sweets and fizzy drinks, which would be untouched by the policy; and the policy would have no bearing on the many existing takeaways. In this context there is no evidence that the requirement would be effective in safeguarding improving childhood health. It would be an inappropriate interference in the market without any supporting evidence and would therefore be unsound”. 5.5 The proposed 400m exclusion zone clause in draft Policy 25 with its blanket prohibition of A5 uses, unless they do close up until after 17:00 on weekdays is simply unsound and is inconsistent with the Framework. 6 Alternative Approaches 6.1 Planware LTD considers there is no sound justification to refuse hot food takeaways within 400m of the educational facilities listed in the above text. The over-concentration (Point C) is also not in accordance with the Framework. Therefore, these two restrictions should be deleted from the policy. 6.2 Planware LTD would welcome and support proposals for a wider study of the causes of obesity and their relationship with development proposals, including examination of how new development can best support healthy lifestyles and the tackling of obesity. 6.3 When a cogent evidence base has been assembled, this can then inform an appropriate policy response. That time has not yet been reached. 7 Conclusion 7.1 McDonald’s supports the policy objective of promoting healthier lifestyles and tackling obesity. It does not consider that the proposed Policy 25 is a sound way of achieving those objectives. The underlying assumption in the policy is that all A5 uses (and any restaurants with an element of A5 use) are inherently harmful to health. In fact, this is not supported by evidence. McDonald’s own business is an example of a restaurant operation which includes A5 use but which offers healthy meal options, transparent nutritional information to allow healthy choices, and quality food and food preparation. The business itself supports healthy lifestyle styles through the support given to its staff and support given to football in the communities which the restaurants serve. 7.2 In addition, the policy fails to acknowledge the wider benefits that restaurants can have, including benefits relevant to community health and wellbeing. McDonald’s own business is an example of a restaurant operation that supports sustainable development through the use of renewable energy, the promotion of recycling, the use of energy and water saving devices. The economic benefits of its restaurants in supporting town centres and providing employment opportunities in training, are substantial, and important given that improved economic circumstances can support improved health. 7.3 The policy fails to acknowledge that food choices which are high in calories and low in nutritional value are made at premises trading with A1 and A3 consents and can be delivered from the latter. The policy makes no attempt to control these uses. 7.4 For the reasons given in this objection the proposed policy is very clearly inconsistent with the aspect of land use policy on positive planning, on supporting economic development and the needs of businesses, on supporting town centres, and on the sequential approach. There is no justification in national policy for a blanket exclusion zone based applied to A5 uses. The effect of the policy had it existed in the past would have been to exclude restaurants such as McDonald’s from major commercial and tourist areas. 7.5 For the reasons given in this objection the proposed policy lacks a credible evidence base, and similar policies have been found to be unsound by inspectors who have examined other plans. In the one London Borough that has had such a policy for about a decade (LB Waltham Forest), it has had no discernible effect on obesity levels, which have in fact increased. 1 Appendix 1 - Food in the School Fringe Tends to be Purchased in Non-A5 Properties 1. Research by Professor Jack Winkler (London Metropolitan University) into the ‘school fringe’ - found just 3/10 purchases by students in a 400m school fringe were made in A5 properties. (note 7 The School Fringe: What Pupils Buy and Eat From Shops Surrounding Secondary Schools, July 2008, Sarah Sinclair and Professor J T Winkler, Nutrition Policy Unit of London Metropolitan University) 2. 70% of purchases in the school fringe were made in non-fast food outlets, and the same research concluded ‘the most popular shop near Urban was the supermarket, with more visits than all takeaways put together’. 3. Professor Winkler’s findings are not an isolated case. A report by Public Health England and the LGA states that fast food school proximity restrictions do ‘not address sweets and other high-calorie food that children can buy in shops near schools.’ (note 8 Public Health England & LGA, Healthy people, healthy places briefing: Obesity and the environment: regulating the growth of fast food outlets, page 5, November 2013) 4. Research by Brighton and Hove found that ‘Newsagents were the most popular premises [in the school fringe], with more pupils visiting newsagents than any A5 premises’. (note 9 Brighton & Hove City
Council & NHS Sussex, Hot-food takeaways near schools; An impact study on takeaways near secondary schools in Brighton and Hove, page 28, September 2011) 5. Likewise, research for the Food Standards Agency on purchasing habits in Scotland found that 'Supermarkets were the place that children reported they most frequently bought food or drinks from at lunchtime'. (note 10 Jennie Macdiarmid et al. Food Standards Agency. Survey of Diet Among Children in Scotland (2010) - http://www.esds.ac.uk/doc/7200/mrdoc/pdf/7200_final_report_part_2.pdf) 6. Indeed, there are several more researchers who have found no evidence to support the hypothesis that less exposure to fast food, or better access to supermarkets are related to higher diet quality or lower BMI in children. (note 11 Forsyth, A., et al., Do adolescents who live or go to school near fast-food restaurants eat more frequently from fast-food restaurants? Health and Place., 2012. 18(6): p. 1261-9. note 12 An, R. and R. Sturm, School and residential neighborhood food environment and diet among California youth. American Journal of Preventative Medicine, 2012. 42(2): p. 129-35. note 13 Timperio, A.F., et al., Children's takeaway and fast-food intakes: associations with the neighbourhood food environment. Public Health Nutrition,, 2009. 12(10): p. 1960-4.) 2 Appendix 2 - Only a limited number of journeys to and from school involve a purchase at a food outlet. 1. This has been confirmed in research by the Children’s Food Trust, which found that only 8% of all journeys to and from school included a purchasing visit to a food outlet. (note 14 Children’s Food Trust - November 2011, page 1 http://www.childrensfoodtrust.org.uk/assets/research-reports/journey_to_school_final_findings.pdf) Table 3. Total number of journeys including a food outlet visit Number of journeys to school: 86 Journeys including a visit to a food outlet: 11 Journeys including a purchase from a food outlet: 8 Number of journeys from school: 87 Journeys including a visit to a food outlet: 6 Journeys including a purchase from a food outlet: 6 Total number of journeys: 173 Journeys including a visit to a food outlet: 17 Journeys including a purchase from a food outlet: 14 Percentage (%) of all journeys: Journeys including a visit to a food outlet: 10 Journeys including a purchase from a food outlet: 8 2. Of the food purchases made on school journeys, confectionary was the most popular item sold - which McDonald's does not offer on its menu. 3. Likewise, research by Ashelsha Datar concluded that children ‘may not purchase significant amounts of junk food in school’ - partly due to 'fewer discretionary resources to purchase them’. (note 15 Ashelsha Datar & Nancy Nicosia, Junk Food in Schools and Childhood Obesity, page 12, May 2013) 4. Indeed, even where purchases were made, 'children may not change their overall consumption of junk food because junk food purchased in school simply substitutes for junk food brought from home.’ 5. Similarly, research by Fleischhacker highlighted the need for future school-based studies to ‘gather information on whether or not the students attending the studied schools actually eat at the restaurants near their schools.’ (note 16 S Fleischhacker et al. A systematic review of fast food access studies, page 9, 17th December 2009) 6. This was also highlighted in the systematic review by Oxford University, which states ‘future work should also incorporate a child’s usual mode of travel to and from school into decisions about appropriate buffer distances.’ The review added that age should also be taken into consideration, as this can impact on travel time and the availability of pocket change. (note 17 J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13-14, 11th December 2013. A systematic review of the influence of the retail food environment around schools on obesity-related outcomes.)

Summary:

Fully support Policy’s 25 aim of promoting healthier living and tackling obesity. However the policy approach is unsound and fails to provide an evidence-based way of achieving the policy’s objective. The underlying assumption in the policy is that all A5 uses (and any restaurants with an element of A5 use) are inherently harmful to health. In addition, the policy fails to acknowledge the wider benefits that restaurants can have, including benefits relevant to community health and wellbeing. The policy fails to acknowledge that food choices high in calories and low in nutritional value are made at premises trading with A1 and A3 consents and the policy makes no attempt to control these uses.

Response:

Doncaster’s Local Plan aims to have a healthier thread throughout the whole Local Plan and this is just one policy which can contribute to reducing obesity levels and supporting people in making healthy choices in Doncaster. Doncaster’s Planning team have taken the opportunity to work alongside Doncaster’s Public Health colleagues who have been involved in the development of the Local Plan. New opportunities to improve the health and well-being and health inequalities of our residents has resulted in the inclusion of a new aim, chapter and policies with a specific policy and evidence review on Hot Food Takeaways. Specific evidence has been published https://www.doncaster.gov.uk/services/planning/retail-and-leisure-study
Comment Ref: C/Policy 22/0014/15/005  
Name: Environment Agency  
Organisation: Environment Agency  
Representing:  

Date: 04/10/2019  
Reason:  
Area: Chapter 9: Countryside  
Policy: Policy 26: Development in the Countryside  

Tests of Soundness:  

Comment:  
Again, no response has been made by the council to our previous concerns. However, given the council's reasoning for other policies, we accept that flood risk policies within the local plan will be applied.

Summary:  
Policy 26 - Development in the Countryside - no response to previous comments but accept wider local plan flood risk policies will be applied

Response:  
Note the concerns made previously that conversions of existing buildings/replacement dwellings in flood risk areas can be problematic and the issue of 'creating betterment'. Agree that other policies in the Local Plan would be relevant (Policy 58: Flood Risk Management) and the approach of the whole local plan has been to avoid duplication wherever possible as some of the responses have been critical of the length of the document already.
Comment:

It would be useful to remind those proposing schemes which would involve the re-use or conversion of a historic rural building that proposals would also need to accord with the relevant Policies for the historic environment. PROPOSED CHANGE Insert the following after Paragraph 9.7:-

"Proposals which would involve the conversion or re-use of a historic building, would also need to satisfy the relevant Policies in Chapter 12"

Summary:

explanatory text para 9.7 - useful to remind applicants for re-use or conversion of a historic rural building that proposals would also need to accord with the relevant policies for the historic environment

Response:

Noted, all policies in the Local Plan where relevant will need to be applied, which includes Chapter 11 policies on the historic environment, but for avoidance of doubt proposed change accepted as per the wording provided. Proposals which would involve the conversion or re-use of a historic building, would also need to satisfy the relevant policies in Chapter 11: The Historic Environment.
Chapter 9: Countryside

Unsound because the Plan is not positively prepared, ie to achieve any positive outcomes for the countryside. The majority of land by area in Doncaster Borough remains rural. Para 2.6 of the Plan notes "Much of the Borough is rural in nature and includes areas of attractive landscape and features, such as limestone gorges, woodlands, country parks and lowland moorland. Over two-thirds of the Borough is in agricultural use, mainly in the eastern parts. Green Belt covers the western half of the Borough." Chapter 9 does not offer a spatial strategy for Doncaster’s countryside, and occupies just 4 of the 386 pages of the Plan. It is wholly unfit for purpose. Chapter 9 restricts itself to defining ‘Countryside’ as a policy designation, distinct from ‘Green Belt’ or from other levels of the settlement hierarchy. Whilst it is necessary and welcome to have a policy (Policy 26) outlining the development management framework for development in non-Green Belt countryside, that policy does not, in itself, warrant a chapter of the Plan. What is missing here is any articulation of the range of types, characteristics and needs of the Borough’s small villages, farming communities and the landscapes they sit within. Many of these are isolated by lack of amenities, lack of public transport and dependence on private cars for transport, but are nevertheless an intrinsic part of the Borough’s character and of its future. By and large, it is immaterial to those communities and landscapes whether they fall within ‘Green Belt’ or ‘Countryside’ for policy purposes, except for the fact that within the Green Belt it is easier to protect against inappropriate development. Within neither policy designation is there any vision or policy for how they are to evolve. How will they be made fit for the low-carbon, low-car future that must inevitably happen if the UK’s legally-binding carbon targets are to be met? Or will these rural areas be excluded from that future through lack of planning? PROPOSED CHANGE We recommend: The Plan should be comprehensively restructured, so that the Borough’s rural areas are not crudely cut off from settlements and then further sub-divided into ‘Green Belt’ and ‘Countryside’. Instead, we recommend a sub-area structure for the Plan, whereby settlements and their surrounding countryside can be understood and planned for in synergy with each other. For example, we list below suggested sub-areas with identifiable characteristics (note that some of these (asterisked*) are currently defined within Doncaster Main Urban Area). This list is illustrative, not definitive, but is provided here to show that when groups of settlements are considered as sub-areas that also contain rural areas, landscapes and green infrastructure, it will be possible to plan for them in more interconnected ways. It is evident, for example, that some of these areas are affected differently by transport connectivity, flood risk and landscape character, and have different development needs and challenges. Brodsworth-Hickleton-Marr-Barnburgh-Harlington-High Melton Mexborough-Conisbrough-Denaby-Edlington-Wadsworth-Tickhill-Bawtry Rossington Hayfield-Finneying-Blaxton-Auckley-Branton-Branton-Cantley* Armithorpe-Edenthorpe*-Kirk Sandall*-Barnby Dun Dunsville-Dunscroft-Hatfield-Stainforth-Hatfield Woodhouse Thorne-Moorends Kirk Bramwith-Braithwaite-Fishlake-Sykehouse-Moss-Fenwick Askern-Campsall-Norton Carcroft-Skeellow-Adwick-Bentley* Scawthorpe*-Scawby*-Cusworth-Sprotbrough The Bradford Core Strategy Partial Review (Preferred Options) has an excellent sub-area approach which we suggest Doncaster looks to for good practice.
Response:
All policies in the Local Plan need to be read together (para 1.14 of the Plan’s introduction highlights this). The introduction to Chapter 9 is clear that the Plan’s strategic approach to Countryside is set out in Policy 2. Policy 2 adopts a settlement hierarchy to direct development to the more sustainable settlements. Some development is supported in the Borough’s smaller settlements, and subject to policy criteria in Part 5 A-E, in the Countryside if adjacent to a Development Limit of a settlement in levels 1-3 of the hierarchy, and in exceptional circumstances (as defined) in the Countryside adjacent to Defined Villages. This adopts an approach which is consistent with NPPF policy and which is positive towards supporting rural housing which together with Policy 26 adopts a sound measured approach to considering development proposals in the Countryside. Further detail is given in the Settlement Strategy Background Paper.

| CUSREF: | 02989 | Name: | Gladman Developments Limited |
| Date: | 30/09/2019 | Organisation: | Gladman Developments Limited |
| Comment Ref: | C/Policy 26/02989/1/011 |
| Attend Examination: | Not Stated |
| Area: | Chapter 9: Countryside |
| Policy: | Policy 26: Development in the Countryside |
| Tests of Soundness: | |
| Comment: | Policy 26 sets out a list of development types that are considered appropriate in the ‘Countryside’. Gladman have raised concerns regarding the use of development limits in response to Policy 2 and, further consider that this policy, in restricting development in the Countryside to a prescriptive list of development uses, could serve to restrict sustainable development opportunities from coming forward. We suggest that, in the event that the Council cannot demonstrate a deliverable 5-year housing land supply, or should evidence be available to suggest that any of the allocated sites are struggling to deliver at the rate within the anticipated timeframe, then it would be wholly appropriate for sustainable development opportunities on the edge of settlements, in the area defined as ‘Countryside’ to come forward without delay. We therefore consider that it is necessary that a further degree of flexibility be established in the policy. |
| Summary: | Policy 26 sets out a list of development types that are considered appropriate in the ‘Countryside’. Gladman have raised concerns regarding the use of development limits in response to Policy 2 and, further consider that this policy, in restricting development in the Countryside to a prescriptive list of development uses, could serve to restrict sustainable development opportunities from coming forward. We suggest that, in the event that the Council cannot demonstrate a deliverable 5-year housing land supply, or should evidence be available to suggest that any of the allocated sites are struggling to deliver at the rate within the anticipated timeframe, then it would be wholly appropriate for sustainable development opportunities on the edge of settlements, in the area defined as ‘Countryside’ to come forward without delay. We therefore consider that it is necessary that a further degree of flexibility be established in the policy. |
| Response: | Policy 26 should be read in conjunction with Policy 2. Policy 2 adopts a positive and flexible approach which (in Part 5) would allow for development on the edge of settlements in levels 1-3 of the Settlement Hierarchy where (part 5e) a five year borough-wide supply of housing land cannot be demonstrated. |
We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Area: Chapter 9: Countryside

Policy: Policy 26: Development in the Countryside

Tests of Soundness: Positively prepared

Comment:
This policy is overly restrictive and not in accordance with the NPPF. It is not positively prepared as it places restrictions on residential development outside of development limits defined in policy 2 is not consistent with national policy. This is discussed further above under policy 2.

Summary:
Policy 26 is overly restrictive and not in accordance with the NPPF. It is not positively prepared as it places restrictions on residential development outside of development limits defined in policy 2 is not consistent with national policy. This is discussed further under policy 2.

Response:
All policies in the Local Plan need to be read together (para 1.14 of the Plan’s introduction highlights this). The introduction to Chapter 9 is clear that the Plan’s strategic approach to Countryside is set out in Policy 2. Policy 2 adopts a settlement hierarchy to direct development to the more sustainable settlements. Some development is supported in the Borough’s smaller settlements, and subject to policy criteria in Part S A-E, in the Countryside if adjacent to a Development Limit of a settlement in levels 1-3 of the hierarchy, and in exceptional circumstances (as defined) in the Countryside adjacent to Defined Villages. This adopts an approach which is consistent with NPPF policy and which is positive towards supporting rural housing which together with Policy 26 adopts a sound measured approach to considering development proposals in the Countryside. Further detail is given in the Settlement Strategy Background Paper.
8.1 Peel has a number of comments on the LP’s other strategic and non-strategic policies as currently drafted. These are summarised below:

8.5 The draft Policy text (and Policies Map) needs to make clear that the allocated DSA sites have been removed from the Countryside. Peel requests that all of the Airport Masterplan’s demise is removed from the countryside. This includes non-development areas such as the proposed rail corridor (note 5 - To facilitate a potential rail station and associated connection of the East Coast Mainline (ECML) and Doncaster - Lincoln Line), Hurst Wood and Marr Flatts Plantation which are physically divorced from the wider open countryside. 8.6 As described in more detail in Section 9 of these representations, Peel requests that land at Gatehouse Lane is removed from the countryside.

Summary:
It should be made clear in the policy text and proposals map that DSA sites have been removed from the countryside. Peel requests that all of the Airport Masterplans demise is removed from the countryside, including the proposed rail corridor, Hurst Wood and Marr Flatts Plantation, as well as Gatehouse Lane Site 1010.

Response:
The Council, and local planning policy, broadly supports the published Growth Plan and is generally supportive of the aspirations included within it. Policy 7 ensures the Council has sufficient overall policy input to ensure that the Airport delivers sustainable and carefully planned growth. The Local Plan allocates land for residential and employment uses and designates the Airport Operational Area. However, it is not the role of the Local Plan to duplicate the draft Masterplan.
Comment:

We support Policy 26 in principle, however, it is proposed that criteria A of Part 1 is deleted as this criterion is not in conformity with the 2018 NPPF. The NPPF, states that "Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply? C) the development would re-use redundant or disused buildings and enhance its immediate setting". With regard to Green Belt, it goes on to say that "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are: c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building". It is therefore considered that criteria A of Part 1 of Policy 26 should be deleted to ensure the emerging Local Plan is in conformity with the revised NPPF when considering proposals that involve the conversion of buildings in the countryside.

Summary:

Support Policy 26 in principle. However, criteria A of Part 1 should be deleted as this is not in conformity with the 2018 NPPF. The NPPF, states that "Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply? C) the development would re-use redundant or disused buildings and enhance its immediate setting". With regard to Green Belt, it goes on to say that "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are: c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building". It is therefore considered that criteria A of Part 1 of Policy 26 should be deleted to ensure the emerging Local Plan is in conformity with the revised NPPF when considering proposals that involve the conversion of buildings in the countryside.

Response:

Policy 26 is in conformity with the NPPF. Policy is included to avoid development by re-use/conversion where it would be excessive effectively amounting to a completely new building. Supporting text in para 9.10 includes a guide to what is likely to considered acceptable in terms of volume increase of an original building. As such the policy is the local interpretation of national policy.
We support Policy 26 in principle, however, it is proposed that criteria A of Part 1 is deleted as this criterion is not in conformity with the 2018 NPPF. The NPPF, states that "Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply? C) the development would re-use redundant or disused buildings and enhance its immediate setting". With regard to Green Belt, it goes on to say that "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are... c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building". It is therefore considered that criteria A of Part 1 of Policy 26 should be deleted to ensure the emerging Local Plan is in conformity with the revised NPPF when considering proposals that involve the conversion of buildings in the countryside.

Support Policy 26 in principle. However, criteria A of Part 1 should be deleted as this is not in conformity with the 2018 NPPF. The NPPF, states that "Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply? C) the development would re-use redundant or disused buildings and enhance its immediate setting". With regard to Green Belt, it goes on to say that "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are... c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building". It is therefore considered that criteria A of Part 1 of Policy 26 should be deleted to ensure the emerging Local Plan is in conformity with the revised NPPF when considering proposals that involve the conversion of buildings in the countryside.

Policy 26 is in conformity with the NPPF. Policy is included to avoid development by re-use/ conversion where it would be excessive effectively amounting to a completely new building. Supporting text in para 9.10 includes a guide to what is likely to considered acceptable in terms of volume increase of an original building. As such the policy is the local interpretation of national policy.
We wish to discuss with the Inspector and Council our concerns regarding the Open Space allocation at Warmsworth. There is detailed evidence which will need to be discussed orally.

We support Policy 26 in principle, however, it is proposed that criteria A of Part 1 is deleted as this criterion is not in conformity with the 2018 NPPF. The NPPF, states that "Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply? C) the development would re-use redundant or disused buildings and enhance its immediate setting". With regard to Green Belt, it goes on to say that "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:.. c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building". It is therefore considered that criteria A of Part 1 of Policy 26 should be deleted to ensure the emerging Local Plan is in conformity with the revised NPPF when considering proposals that involve the conversion of buildings in the countryside.

Support Policy 26 in principle. However, criteria A of Part 1 should be deleted as this is not in conformity with the 2018 NPPF. The NPPF, states that "Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply? C) the development would re-use redundant or disused buildings and enhance its immediate setting". With regard to Green Belt, it goes on to say that "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:.. c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building". It is therefore considered that criteria A of Part 1 of Policy 26 should be deleted to ensure the emerging Local Plan is in conformity with the revised NPPF when considering proposals that involve the conversion of buildings in the countryside.

Policy 26 is in conformity with the NPPF. Policy is included to avoid development by re-use/ conversion where it would be excessive effectively amounting to a completely new building. Supporting text in para 9.10 includes a guide to what is likely to considered acceptable in terms of volume increase of an original building. As such the policy is the local interpretation of national policy.
We support Policy 26 in principle, however, it is proposed that criteria A of Part 1 is deleted as this criterion is not in conformity with the 2018 NPPF. The NPPF, states that "Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply? C) the development would re-use redundant or disused buildings and enhance its immediate setting". With regard to Green Belt, it goes on to say that "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are... c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building". It is therefore considered that criteria A of Part 1 of Policy 26 should be deleted to ensure the emerging Local Plan is in conformity with the revised NPPF when considering proposals that involve the conversion of buildings in the countryside.

Response:
Policy 26 is in conformity with the NPPF. Policy is included to avoid development by re-use/conversion where it would be excessive effectively amounting to a completely new building. Supporting text in para 9.10 includes a guide to what is likely to considered acceptable in terms of volume increase of an original building. As such the policy is the local interpretation of national policy.
Policy 26 (Development in the Countryside) seeks to restrict new dwellings in the countryside beyond what paragraph 79 of the NPPF envisages. The policy seeks to apply the restrictions in paragraph 79 which should only apply to isolated dwellings to any proposal for housing in the countryside. This approach directly contradicts national planning policy in the NPPF and Planning Practice Guidance. The NPPF approach towards the role of rural housing was previously set out in paragraphs 54 and 55 of the 2012 NPPF. This is now set out in paragraphs 77, 78 and 79 of the 2019 NPPF, however the overall approach towards rural housing has not been amended, therefore previous appeal and case law interpretations of paragraph 55 of the 2012 NPPF remain valid and relevant to the determination of conformity with national planning policy. Paragraph 78 of the 2019 NPPF states: "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby." In some respects this approach is more explicit than the former NPPF that villages, even small villages should be given an opportunity to grow and thrive. The Doncaster Local Plan seeks to resist residential development in the countryside generally. It goes well beyond resisting isolated dwellings in the countryside. Sites in settlements and groupings of development that may not be identified as a defined village can in no way can be considered to be isolated in our view. The Framework does not define "isolated", therefore Inspectors tend to rely on the everyday definition of the word as meaning lonely or remote or as the Courts have concluded "far away from people or places". The countryside is proposed to wash over settlements that are not identified as a defined village and groupings of development that are not visually or physically isolated, and are not functionally isolated relative to services and facilities. The High Court judgment in Braintree District Council v Secretary of State for Communities and Local Government & Ors [2017] handed down on 15th November 2017 regarding paragraph 55 of the 2012 NPPF and new isolated homes in the countryside. The High Court judgment considers that "isolated" should be given its ordinary objective meaning of "far away from other places, buildings or people; remote". Consequently any proposed new residential property within or on the edge of a settlement including settlements that are not identified as a defined village and groupings of development cannot be considered isolated in terms of paragraph 55 of the previous 2012 NPPF, new paragraph 79 of the 2019 NPPF. This judgement has been confirmed as being perfectly valid in the Court of Appeal. At this time the obiter of Lord Justice Lindblom in the Court of Appeal In Braintree District Council v Secretary of State for Communities & Local Government [2018] is highly relevant. In paragraph 32 of his judgement he states: "What constitutes a settlement for these purposes is also left undefined in the NPPF. The NPPF contains no definitions of a "community", a "settlement", or a "village". There is no specified minimum number of dwellings, or population. It is not said that a settlement or development boundary must have been fixed in an adopted or emerging local plan, or that only the land and buildings within that settlement or development boundary will constitute the settlement. In my view a settlement would not necessarily exclude a hamlet or a cluster of dwellings, without, for example, a shop or post office of its own, or a school or community hall or a public house nearby, or public transport within easy reach. Whether, in a particular case, a group of dwellings constitutes a settlement, or a "village", for the purposes of the policy will again be a matter of fact and planning judgment for the decision-maker. In the second sentence of paragraph 55 the policy acknowledges that development in one village may "support services" in another. It does not stipulate that, to be a "village", a settlement must have any "services" of its own, let alone "services" of any specified kind." The obiter of Lord Justice Lindblom is clear that in his view the NPPF does not require a grouping of development to be either within a defined settlement boundary or be designated as such in a development plan to fall to be considered to be a 'settlement'. In addition he is also clear that a grouping of development does not need to be any minimum size or have any services and facilities to be deemed to be a 'settlement' in planning terms. The obiter of Lord Justice Lindblom in paragraphs 30 and 31 of the Court of Appeal judgement also referred to "isolated" as meaning "?standing apart or alone, detached or separate from other things or persons; unconnected with anything else; solitary?" He then went on to clearly state: "In my view, in its particular context in paragraph 55 of the NPPF, the word "isolated" in the phrase "isolated homes in the countryside" simply connotes a dwelling that is physically separate or remote from a settlement. Whether a proposed new dwelling is, or is not, "isolated" in this sense will be a matter of fact and planning judgment for the decision-maker in the particular circumstances of the case in hand." The restrictive approach of Policies 2 and 26 is in our view clearly inconsistent with National Planning Policy in paragraphs 78 and 79 of the NPPF; the advice in Planning Practice Guidance; and case law established in both of the Braintree cases. Again the obiter of Lord Justice Lindblom in the Court of Appeal in Braintree District Council v Secretary of State for Communities & Local Government [2018] is highly relevant. In paragraph 29 of his judgement he states: "?the policy explicitly concerns the location of new housing development. The first sentence of paragraph 55 tells authorities where housing should be "located". The location is "where it will enhance or maintain the vitality of rural communities". The concept of the "vitality" of such a community is wide, and undefined. The example given in the second sentence of paragraph 55 - "development in one village" that "may support services in a village nearby" - does not limit the notion of "vitality" to a consideration of "services" alone. But it does show that the policy sees a possible benefit of developing housing in a rural settlement with no, or relatively few, services of its own. The third sentence of the paragraph enjoins authorities to avoid "new isolated homes in the countryside". This is a distinction between places. The contrast is explicitly and simply a geographical one. Taken in the context of the preceding two sentences, it simply differentiates between the development of housing within a settlement - or "village" - and new dwellings that would be "isolated" in the sense of being separate or remote from a settlement. Under the
The introduction to Chapter 9 is clear that the Plan's strategic approach to Countryside is set out in Policy 2. Policy 2 adopts a settlement hierarchy to direct development to the more sustainable settlements. Some development is supported in the Borough's smaller settlements, and subject to policy criteria in Part 5 A-E, in the Countryside if adjacent to a Development Limit of a settlement in levels 1-3 of the hierarchy, and in exceptional circumstances (as defined) in the Countryside adjacent to Defined Villages. This adopts an approach which is consistent with NPPF policy and which is positive towards supporting rural housing which together with Policy 26 adopts a sound measured approach to considering development proposals in the Countryside. Without such a policy approach there would be significant pressure for proposals for development on the edge of, or near to, settlements throughout the borough - which would be clearly unsustainable. This would be contrary to NPPF policy in para 170b that planning decisions should recognise the 'intrinsic character and beauty of the countryside?. To allow such development would lead to an un-planned gradual erosion of the character of the countryside and setting of settlements.
Policy 26 (Development in the Countryside) seeks to unduly restrict the size of replacement dwellings and extensions to dwellings in the countryside without explaining why a 40% increase threshold is appropriate. In relation to extensions to dwellings Parliament has not seen fit to consider it necessary to apply different permitted development rights to dwellings in the countryside to those in settlements. As such a dwelling in the countryside benefits from the standard generous permitted development rights. Dwellings in the countryside tend to be sited within larger plots than many urban dwellings. Cumulatively such permitted development rights potentially allow for a dwelling to be extended by more than 40%, for example a single storey dwelling could have an extension with a width no greater than half the width of the original dwelling house. This would be a 50% increase in itself in a single extension which then combined with the type of rear extension allowable could easily result in a cumulative scale of extension in some cases around a 100% increase. Consequently the Policy is seeking to impose an unduly restrictive approach on the scale of extensions where planning permission is required. In cases where planning permission is required therefore the Council is seeking to be restrictive than that which is likely to be permissible under permitted development rights. There is no evidence or rationale set out to explain why a 40% increase threshold is necessary in Doncaster. It is also an inflexible criteria which does not cater for the varied planning circumstances found in Doncaster. It is also inconsistent with the latter policy criteria on replacement dwellings where the 40% increase threshold only applies where it would have a significant impact on the character of the countryside. It is unclear why a more restrictive approach towards extending existing dwellings is justified compared to replacement dwellings. This could result in an unintended consequence of parties considering that it may be easier to seek a replacement dwelling rather than extending an existing dwelling. Making effective benefit use of existing dwelling stock, including through renovation and extension is an important contributor to sustainable development. The Local Plan includes no percentage increase threshold on extensions to dwellings in settlements, there is no rationale put forward as to why a different approach in the countryside is necessary or appropriate. The 40% threshold also applies to increases in size of outbuildings, for example this would prevent a household going from a single garage to a double garage which would be an unreasonable restriction in circumstances where planning permission is required. This could result in the unintended consequence of householders pursuing poor designs to stay within permitted development rights rather than have to apply for planning permission. For example looking at using a flat roof extension to a garage rather than using a well-designed pitched roof. In relation to replacement dwellings again the Policy refers to a 40% increase threshold where it would have a significant impact on the character of the countryside. As such there is no threshold for circumstances where a replacement dwelling would not have a significant impact on the character of the countryside. However paragraph 9.11 implies that the 40% threshold criteria applies in all cases. As such there is fundamental inconsistency in the Policy and its supporting text. Again there is no evidence or rationale set out to explain why a 40% increase threshold is necessary in Doncaster. It is also an inflexible criteria which does not cater for the varied planning circumstances found in Doncaster.

PROPOSED CHANGE Amend Policy 26 as follows: Part 2: Replacement of a Dwelling and Extensions to Existing Dwellings Proposals for the replacement of a dwelling in the Countryside will be supported provided that: A) the original building is permanent and is not the result of a temporary permission; B) the original building has not become derelict or previous residential use abandoned; C) replacement dwellings are positioned on a comparable footprint, and in close proximity, to the original building unless it can be demonstrated that the re-positioning would be significantly more beneficial (to, for example, the character and appearance of the site and locality). (LAST SENTENCE OF PART C TO DELETE - SHOWN AS STRIKETHROUGH ON REP BUT THIS CANNOT BE SHOWN) D) the proposal does not adversely affect neighbouring residential amenity; and E) it would not undermine the retention of any occupancy condition. Proposals to extend existing dwellings in the Countryside, or any other building within its curtilage, will be supported provided that Criteria A, B, D & E above are satisfied; and that: SENTENCE F TO DELETE - SHOWN AS STRIKETHROUGH ON REP BUT THIS CANNOT BE SHOWN G) would not have a visual impact prejudicial to the character of the building or the amenity of the countryside. Amend the supporting text to Policy 26 as follows: 9.8. Proposals to replace or extend dwellings in the Countryside will be subject to Part 2 of the Policy to assess the proposal 9.9 / 9.10 / 9.11 TO DELETE - SHOWN AS STRIKETHROUGH ON REP BUT THIS CANNOT BE SHOWN

Summary:

Policy 26 (Development in the Countryside) seeks to unduly restrict the size of replacement dwellings and extensions to dwellings in the countryside without explaining why a 40% increase threshold is appropriate. Permitted development rights to dwellings in the countryside have not been distinguished differently to those in settlements. Therefore a dwelling in the countryside benefits from the standard generous PD rights. As a consequence to Policy 26, where planning permission is required for development the council is seeking to be restrictive than that where planning permission is not normally required under PD. There is no evidence or rationale set out to explain why a 40% increase threshold is necessary in Doncaster. It is also an inflexible criteria which does not cater for the varied planning circumstances. It could result in an unintended consequence of parties considering that it may be easier to seek a replacement dwelling rather than extending an existing dwelling. The threshold also applies to increases in size of outbuildings, which would be unreasonable and could result as an unintended consequence of poor design to stay within PD rights.
Policy 26 is in conformity with the NPPF. Policy is included to avoid development by re-use/conversion where it would be excessive effectively amounting to a completely new building. Supporting text in para 9.10 includes a guide to what is likely to considered acceptable in terms of volume increase of an original building. As such the policy is the local interpretation of national policy.

Comment Ref: C/Policy 26/05014/1/005

Comment: Part 4: New Non-Residential Development in the Countryside UKOOG Response: The policy states: ‘Proposals for non-residential developments will be supported in the countryside provided that; A) The rural location of the enterprise is justifiable to support a prosperous rural economy in accordance with national policy in the NPPF; B) The location of the enterprise would not have a significant adverse effect on neighbouring uses or on highway safety; C) The development is of a size (including floor space) and scale commensurate with an existing use, or that reasonably required for a new use and with the rural character of the location; and D) The scale and design of the proposal would not have a significant adverse impact on the landscape; E) Proposals for the provision or expansion of the existing uses can demonstrate that the need for such development are not met by existing facilities in existing settlements’. This policy must reflect that minerals, including oil and gas, can only be worked where they are found, as clearly stated in the WMS 2018, and temporary in nature. It is our view, that the policy as currently drafted does not take account of the temporary nature, or that impacts can be avoided through good design or through mitigation to acceptable levels on a case by case basis, with sites being restored to their former, or an agreed improved, condition once the site is decommissioned.

Summary: Policy 26 part 4. As stated in the WMS 2018, this policy must reflect that minerals including oil and gas, can only be worked where they are found (the working of which is temporary). National policy (para 146) also identifies mineral extraction is not inappropriate in the greenbelt and para 203 reiterates minerals can only be worked where they are found.

Response: Comment noted. The local plan should be read as a whole. See minerals policies and paragraph 14.33, which cover temporary nature of mineral workings.
Whilst it is appreciated that this policy primarily relates to residential development, it does provide for new non-residential development in the countryside. Part 4 of the Policy should recognise that there are other types of development that could be acceptable, or could be made acceptable in countryside areas. The Plan should recognise that minerals can only be worked where they occur and are of a temporary nature. For the purposes of onshore oil and gas, this is clearly set out in the Written Ministerial Statement (WMS) of May 2018. Whilst supporting non-residential development outside development limits and within countryside areas, the policy does not take account of the temporary nature of mineral developments. Similarly it does not recognise that potential impacts can be avoided or mitigated for through good design to acceptable levels on a case by case basis. All mineral operations are temporary, but onshore oil and gas exploration and appraisal sites may be over a relatively very short time period with land being restored to its former use, or an agreed improved, condition once a site is decommissioned. In this respect, there should be stronger support for temporary developments in the countryside.

Summary:
Policy 26. Part 4 should recognise that other types of development are acceptable in the countryside as set out in ministerial statement May 2018. Should be stronger support for temporary development in the countryside

Response:
Comment noted. The local plan should be read as a whole. See paragraph 14.33 in the minerals chapter, which covers temporary nature of mineral workings.
Reason: To fully represent our clients land interest and respond to matters that may be raised at the hearing sessions.

Area: Chapter 9: Countryside
Policy: Policy 26: Development in the Countryside

Tests of Soundness: Positively prepared, Effective, Legally Compliant, Justified, Consistent with national

Comment:
Policy 26 (Development in the Countryside) is not sound as it has not been positively prepared and is not consistent with the NPPF. Paragraph 9.2 which supports Policy 26 confirms the approach within the emerging Local Plan is to categorise all land out with settlement boundaries as either Countryside or Green Belt however, Policy 26 sets more restrictive criteria for development within the Countryside. Whilst there is clearly a tension which needs to be addressed between Policy 2 and Policy 26 (as is outlined under our response to Policy 2 above) it is clear that this is a policy strategy of constraining development rather than directing sustainable development to meet need. The Countryside designation is misleading and implies a strong degree of protection, akin to that of the Green Belt which is not required. Whilst the NPPF identifies the need to recognise the intrinsic character and beauty of the countryside as part of the pursuit of sustainable development, it does not direct that all countryside should be protected for its own sake. The recent strong delivery in Doncaster shows market demand and demonstrates an imperative need for flexibility which Policy 26 (and by virtue of this, Policy 2) currently does not afford. We trust these comments will be taken into account in the review of the Local Plan prior to submission.

Summary:
Objects to Policy 26 (Development in the Countryside) as not sound as it has not been positively prepared and is not consistent with the NPPF. Para 9.2 confirms the approach is to categorise all land out with settlement boundaries as either Countryside or Green Belt however, Policy 26 sets more restrictive criteria for development within the Countryside. This is a policy strategy of constraining development rather than directing sustainable development to meet need. The Countryside designation is misleading and implies a strong degree of protection, akin to that of the Green Belt which is not required. NPPF identifies the need to recognise the intrinsic character and beauty of the countryside as part of the pursuit of sustainable development, it does not direct that all countryside should be protected for its own sake. The recent strong delivery in Doncaster shows market demand and demonstrates an imperative need for flexibility which Policy 26 (and by virtue of this, Policy 2) currently does not afford.

Response:
All policies in the Local Plan need to be read together (para 1.14 of the Plan’s introduction highlights this). The introduction to Chapter 9 is clear that the Plan’s strategic approach to Countryside is set out in Policy 2. Policy 2 adopts a settlement hierarchy to direct development to the more sustainable settlements. Some development is supported in the Borough’s smaller settlements, and subject to policy criteria in Part 5 A-E, in the Countryside if adjacent to a Development Limit of a settlement in levels 1-3 of the hierarchy, and in exceptional circumstances (as defined) in the Countryside adjacent to Defined Villages. This adopts an approach which is consistent with NPPF policy and which is positive towards supporting rural housing which together with Policy 26 adopts a sound measured approach to considering development proposals in the Countryside. Further detail is given in the Settlement Strategy Background Paper.
**Reason:** We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

**Area:** Chapter 9: Countryside

**Policy:** Policy 26: Development in the Countryside

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<th>Tests of Soundness</th>
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**Comment:** This policy is overly restrictive and not in accordance with the NPPF. It is not positively prepared as it places restrictions on residential development outside of development limits defined in policy 2 is not consistent with national policy. This is discussed further above under policy 2.

**Summary:** Policy 26 is overly restrictive and not in accordance with the NPPF. It is not positively prepared as it places restrictions on residential development outside of development limits defined in policy 2 is not consistent with national policy. This is discussed further under policy 2.

**Response:**

All policies in the Local Plan need to be read together (para 1.14 of the Plan’s introduction highlights this). The introduction to Chapter 9 is clear that the Plan’s strategic approach to Countryside is set out in Policy 2. Policy 2 adopts a settlement hierarchy to direct development to the more sustainable settlements. Some development is supported in the Borough’s smaller settlements, and subject to policy criteria in Part 5 A-E, in the Countryside if adjacent to a Development Limit of a settlement in levels 1-3 of the hierarchy, and in exceptional circumstances (as defined) in the Countryside adjacent to Defined Villages. This adopts an approach which is consistent with NPPF policy and which is positive towards supporting rural housing which together with Policy 26 adopts a sound measured approach to considering development proposals in the Countryside. Further detail is given in the Settlement Strategy Background Paper.
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Area: Chapter 9: Countryside

Policy: Policy 26: Development in the Countryside

Tests of Soundness: Positively prepared

Consistent with national

Comment:

This policy is overly restrictive and not in accordance with the NPPF. It is not positively prepared as it places restrictions on residential development outside of development limits defined in policy 2 is not consistent with national policy. This is discussed further above under policy 2.

Summary:

Policy 26 is overly restrictive and not in accordance with the NPPF. It is not positively prepared as it places restrictions on residential development outside of development limits defined in policy 2 is not consistent with national policy. This is discussed further under policy 2.

Response:

All policies in the Local Plan need to be read together (para 1.14 of the Plan’s introduction highlights this). The introduction to Chapter 9 is clear that the Plan’s strategic approach to Countryside is set out in Policy 2. Policy 2 adopts a settlement hierarchy to direct development to the more sustainable settlements. Some development is supported in the Borough’s smaller settlements, and subject to policy criteria in Part S A-E, in the Countryside if adjacent to a Development Limit of a settlement in levels 1-3 of the hierarchy, and in exceptional circumstances (as defined) in the Countryside adjacent to Defined Villages. This adopts an approach which is consistent with NPPF policy and which is positive towards supporting rural housing which together with Policy 26 adopts a sound measured approach to considering development proposals in the Countryside. Further detail is given in the Settlement Strategy Background Paper.
Policy 26 (Development in the Countryside) is not sound as it has not been positively prepared and is not consistent with the NPPF. Paragraph 9.2 which supports Policy 26 confirms the approach within the emerging Local Plan is to categorise all land out with settlement boundaries as either Countryside or Green Belt however, Policy 26 sets more restrictive criteria for development within the Countryside. Whilst there is clearly a tension which needs to be addressed between Policy 2 and Policy 26 (as is outlined under our response to Policy 2 above) it is clear that this is a policy strategy of constraining development rather than directing sustainable development to meet need. The Countryside designation is misleading and implies a strong degree of protection, akin to that of the Green Belt which is not required. Whilst the NPPF identifies the need to recognise the intrinsic character and beauty of the countryside as part of the pursuit of sustainable development, it does not direct that all countryside should be protected for its own sake. The recent strong delivery in Doncaster shows market demand and demonstrates an imperative need for flexibility which Policy 26 (and by virtue of this, Policy 2) currently does not afford.

Summary:
Policy 26 - Development in the Countryside. 1. This Policy is aimed at constraining development rather than direct sustainable development to meet need. 2. There is a need for flexiblity which this Policy does not afford.

Response:
All policies in the Local Plan need to be read together (para 1.14 of the Plan’s introduction highlights this). The introduction to Chapter 9 is clear that the Plan’s strategic approach to Countryside is set out in Policy 2. Policy 2 adopts a settlement hierarchy to direct development to the more sustainable settlements. Some development is supported in the Borough’s smaller settlements, and subject to policy criteria in Part 5 A-E, in the Countryside if adjacent to a Development Limit of a settlement in levels 1-3 of the hierarchy, and in exceptional circumstances (as defined) in the Countryside adjacent to Defined Villages. This adopts an approach which is consistent with NPPF policy and which is positive and flexible towards supporting rural housing which together with Policy 26 adopts a sound measured approach to considering development proposals in the Countryside. Further detail is given in the Settlement Strategy Background Paper.
6.1 This section reviews other draft policies in the emerging Local Plan which are relevant to major housing development. 6.2 Draft Policy 2 sets out that residential development will be supported in the Countryside if adjacent to a Development Limit of a settlement in Levels 1-3 and will meet a number of criteria. As drafted, Don Parkinson considers that the policy is unsound and not positively prepared or justified. It is considered that the Council should consider unallocated sites which may come forward during the plan period which are considered to be sustainable development. Part 5e is considered to be unduly onerous and is totally unjustified. As drafted it restricts any unallocated development which is found to be sustainable, the NPPF is clear that five year supply and proposed allocations should identify a minimum of housing. 6.3 Furthermore, it is considered that the Development Limits of Thorne should be amended to include the subject site (Sites 002,003, 004 and 005). 6.4 Draft Policy 26 sets out that planning permission for new dwellings within the Countryside will be granted for dwellings to meet the essential needs of agriculture, forestry, or other enterprise which justifies a rural location (which also meets a range of criteria). The policy does not take into account that some areas of Countryside identified on the policies map is located adjacent to Main Towns which are more urban in character than rural. The policy should be amended to support the delivery of unallocated housing sites which may come forward within such areas. 6.5 Don Parkinson considers that draft Policy 2 and 26 as drafted is unsound and not effective or justified. The Council should seek to amend the policies as discussed above.

Summary:
Policy 2: This Policy is unsound and not positively prepared or justified. The Council should consider unallocated sites which may come forward during the plan period which are considered to be sustainable development. Part 5e is unduly onerous and is totally unjustified. It currently restricts any unallocated development that is sustainable. The NPPF is clear that a five year supply and proposed allocations should identify a minimum of housing. The development limits of Thorne should be amended to include the subject site (Sites 002,003, 004 and 005). Policy 26: is unsound and not effective or justified. This policy does not take into account that some areas of Countryside identified on the policies map are located adjacent to Main Towns which are more urban in character than rural. The policy should be amended to support the delivery of unallocated housing sites which may come forward within such areas.

Response:
The introduction to Chapter 9 is clear that the Plan’s strategic approach to Countryside is set out in Policy 2. Policy 2 adopts a settlement hierarchy to direct development to the more sustainable settlements. Some development is supported in the Borough’s smaller settlements, and subject to policy criteria in Part 5 A-E, in the Countryside if adjacent to a Development Limit of a settlement in Levels 1-3 of the hierarchy, and in exceptional circumstances (as defined) in the Countryside adjacent to Defined Villages. This adopts an approach which is consistent with NPPF policy and which is positive towards supporting rural housing which together with Policy 26 adopts a sound measured approach to considering development proposals in the Countryside. Part 5E of Policy 2 allows for planned flexibility in those circumstances where there is a lack of a 5 year housing land supply - this maintains the primacy of the Development Plan but allows development adjacent to settlements in tiers 1-3 of the settlement hierarchy in the circumstances set out. Without such a policy approach there would be significant pressure for proposals for development on the edge of, or near to, settlements throughout the borough - which would be clearly unsustainable. This would be contrary to NPPF policy in para 170b that planning decisions should recognise the ‘intrinsic character and beauty of the countryside’. To allow such development would lead to an un-planned gradual erosion of the character of the countryside and setting of settlements.
6.1 This section reviews other draft policies in the emerging Local Plan which are relevant to major housing development. 6.2 Draft Policy 2 sets out that residential development will be supported in the Countryside if adjacent to a Development Limit of a settlement in levels 1-3 and will meet a number of criteria. As drafted, Don Parkinson considers that the policy is unsound and not positively prepared or justified. It is considered that the Council should consider unallocated sites which may come forward during the plan period which are considered to be sustainable development. Part 5e is considered to be unduly onerous and is totally unjustified. As drafted it restricts any unallocated development which is found to be sustainable, the NPPF is clear that five year supply and proposed allocations should identify a minimum of housing. 6.3 Furthermore, it is considered that the Development Limits of Thorne should be amended to include the subject site (Sites 002,003, 004 and 005). 6.4 Draft Policy 26 sets out that planning permission for new dwellings within the Countryside will be granted for dwellings to meet the essential needs of agriculture, forestry, or other enterprise which justifies a rural location (which also meets a range of criteria). The policy does not take into account that some areas of Countryside identified on the policies map are located adjacent to Main Towns which are more urban in character than rural. The policy should be amended to support the delivery of unallocated housing sites which may come forward within such areas. 6.5 Don Parkinson considers that draft Policy 2 and 26 as drafted is unsound and not effective or justified. The Council should seek to amend the policies as discussed above.

Summary:
Policy 2: This Policy is unsound and not positively prepared or justified. The Council should consider unallocated sites which may come forward during the plan period which are considered to be sustainable development. Part 5e is unduly onerous and is totally unjustified. It currently restricts any unallocated development that is sustainable. The NPPF is clear that a five year supply and proposed allocations should identify a minimum of housing. The development limits of Thorne should be amended to include the subject site (Sites 002,003, 004 and 005). Policy 26: is unsound and not effective or justified. This policy does not take into account that some areas of Countryside identified on the policies map are located adjacent to Main Towns which are more urban in character than rural. The policy should be amended to support the delivery of unallocated housing sites which may come forward within such areas.

Response:
The introduction to Chapter 9 is clear that the Plan’s strategic approach to Countryside is set out in Policy 2. Policy 2 adopts a settlement hierarchy to direct development to the more sustainable settlements. Some development is supported in the Borough’s smaller settlements, and subject to policy criteria in Part 5 A-E, in the Countryside if adjacent to a Development Limit of a settlement in levels 1-3 of the hierarchy, and in exceptional circumstances (as defined) in the Countryside adjacent to Defined Villages. This adopts an approach which is consistent with NPPF policy and which is positive towards supporting rural housing which together with Policy 26 adopts a sound measured approach to considering development proposals in the Countryside. Part 5E of Policy 2 allows for planned flexibility in those circumstances where there is a lack of a 5 year housing land supply - this maintains the primacy of the Development Plan but allows development adjacent to settlements in tiers 1-3 of the settlement hierarchy in the circumstances set out. Without such a policy approach there would be significant pressure for proposals for development on the edge of, or near to, settlements throughout the borough - which would be clearly unsustainable. This would be contrary to NPPF policy in para 170b that planning decisions should recognise the ‘intrinsic character and beauty of the countryside’. To allow such development would lead to an un-planned gradual erosion of the character of the countryside and setting of settlements.
Comment Ref: C/Policy 26/05296/1/010

Attend Examination: Attend Hearing

Reason: To fully represent our clients land interest and respond to matters that may be raised at the hearing sessions. Please refer to accompanying representation 'Doncaster Local Plan Representations to Draft Doncaster Local Plan - Publication Draft' (September 2019) on behalf of Don Parkinson Partnership (doc ref. 60752/01/JG/AK).

Area: Chapter 9: Countryside

Policy: Policy 26: Development in the Countryside

Tests of Soundness: Positively prepared  Justified  Effective  Consistent with national  Legally Compliant

Comment:

6.1 This section reviews other draft policies in the emerging Local Plan which are relevant to major housing development. 6.2 Draft Policy 2 sets out that residential development will be supported in the Countryside if adjacent to a Development Limit of a settlement in levels 1-3 and will meet a number of criteria. As drafted, Don Parkinson considers that the policy is unsound and not positively prepared or justified. It is considered that the Council should consider unallocated sites which may come forward during the plan period which are considered to be sustainable development. Part 5e is considered to be unduly onerous and is totally unjustified. As drafted it restricts any unallocated development which is found to be sustainable, the NPPF is clear that five year supply and proposed allocations should identify a minimum of housing. 6.3 Furthermore, it is considered that the Development Limits of Thorne should be amended to include the subject site (Sites 002,003, 004 and 005). 6.4 Draft Policy 26 sets out that planning permission for new dwellings within the Countryside will be granted for dwellings to meet the essential needs of agriculture, forestry, or other enterprise which justifies a rural location (which also meets a range of criteria). The policy does not take into account that some areas of Countryside identified on the policies map are located adjacent to Main Towns which are more urban in character than rural. The policy should be amended to support the delivery of unallocated housing sites which may come forward within such areas. 6.5 Don Parkinson considers that draft Policy 2 and 26 as drafted is unsound and not effective or justified. The Council should seek to amend the policies as discussed above.

Summary:

Policy 2: This Policy is unsound and not positively prepared or justified. The Council should consider unallocated sites which may come forward during the plan period which are considered to be sustainable development. Part 5e is unduly onerous and is totally unjustified. It currently restricts any unallocated development that is sustainable. The NPPF is clear that a five year supply and proposed allocations should identify a minimum of housing. The development limits of Thorne should be amended to include the subject site (Sites 002,003, 004 and 005). Policy 26: is unsound and not effective or justified. This policy does not take into account that some areas of Countryside identified on the policies map are located adjacent to Main Towns which are more urban in character than rural. The policy should be amended to support the delivery of unallocated housing sites which may come forward within such areas.

Response:

The introduction to Chapter 9 is clear that the Plan’s strategic approach to Countryside is set out in Policy 2. Policy 2 adopts a settlement hierarchy to direct development to the more sustainable settlements. Some development is supported in the Borough’s smaller settlements, and subject to policy criteria in Part 5 A-E, in the Countryside if adjacent to a Development Limit of a settlement in levels 1-3 of the hierarchy, and in exceptional circumstances (as defined) in the Countryside adjacent to Defined Villages. This adopts an approach which is consistent with NPPF policy and which is positive towards supporting rural housing which together with Policy 26 adopts a sound measured approach to considering development proposals in the Countryside. Part 5E of Policy 2 allows for planned flexibility in those circumstances where there is a lack of a 5 year housing land supply - this maintains the primacy of the Development Plan but allows development adjacent to settlements in tiers 1-3 of the settlement hierarchy in the circumstances set out. Without such a policy approach there would be significant pressure for proposals for development on the edge of, or near to, settlements throughout the borough - which would be clearly unsustainable. This would be contrary to NPPF policy in para 170b that planning decisions should recognise the ‘intrinsic character and beauty of the countryside’. To allow such development would lead to an un-planned gradual erosion of the character of the countryside and setting of settlements.
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Comment Ref: C/Policy 26/05297/1/010

Attend Examination: Attend Hearing

Reason: To fully represent our clients land interest and respond to matters that may be raised at the hearing sessions. Please refer to accompanying representation 'Doncaster Local Plan Representations to Draft Doncaster Local Plan - Publication Draft' (September 2019) on behalf of Don Parkinson Partnership (doc ref. 60752/01/JG/AK).

Area: Chapter 9: Countryside

Policy: Policy 26: Development in the Countryside

Tests of Soundness:
- Positively prepared
- Effective
- Legally Compliant
- Justified
- Consistent with national

Comment:

6.1 This section reviews other draft policies in the emerging Local Plan which are relevant to major housing development. 6.2 Draft Policy 2 sets out that residential development will be supported in the Countryside if adjacent to a Development Limit of a settlement in levels 1-3 and will meet a number of criteria. As drafted, Don Parkinson considers that the policy is unsound and not positively prepared or justified. It is considered that the Council should consider unallocated sites which may come forward during the plan period which are considered to be sustainable development. Part 5e is considered to be unduly onerous and is totally unjustified. As drafted it restricts any unallocated development which is found to be sustainable, the NPPF is clear that five year supply and proposed allocations should identify a minimum of housing. 6.3 Furthermore, it is considered that the Development Limits of Thorne should be amended to include the subject site (Sites 002,003, 004 and 005). 6.4 Draft Policy 26 sets out that planning permission for new dwellings within the Countryside will be granted for dwellings to meet the essential needs of agriculture, forestry, or other enterprise which justifies a rural location (which also meets a range of criteria). The policy does not take into account that some areas of Countryside identified on the policies map are located adjacent to Main Towns which are more urban in character than rural. The policy should be amended to support the delivery of unallocated housing sites which may come forward within such areas. 6.5 Don Parkinson considers that draft Policy 2 and 26 as drafted is unsound and not effective or justified. The Council should seek to amend the policies as discussed above.

Summary:

Policy 2: This Policy is unsound and not positively prepared or justified. The Council should consider unallocated sites which may come forward during the plan period which are considered to be sustainable development. Part 5e is unduly onerous and is totally unjustified. It currently restricts any unallocated development that is sustainable. The NPPF is clear that a five year supply and proposed allocations should identify a minimum of housing. The development limits of Thorne should be amended to include the subject site (Sites 002,003, 004 and 005). Policy 26: is unsound and not effective or justified. This policy does not take into account that some areas of Countryside identified on the policies map are located adjacent to Main Towns which are more urban in character than rural. The policy should be amended to support the delivery of unallocated housing sites which may come forward within such areas.

Response:

The introduction to Chapter 9 is clear that the Plan’s strategic approach to Countryside is set out in Policy 2. Policy 2 adopts a settlement hierarchy to direct development to the more sustainable settlements. Some development is supported in the Borough’s smaller settlements, and subject to policy criteria in Part 5 A-E, in the Countryside if adjacent to a Development Limit of a settlement in levels 1-3 of the hierarchy, and in exceptional circumstances (as defined) in the Countryside adjacent to Defined Villages. This adopts an approach which is consistent with NPPF policy and which is positive towards supporting rural housing which together with Policy 26 adopts a sound measured approach to considering development proposals in the Countryside. Part 5E of Policy 2 allows for planned flexibility in those circumstances where there is a lack of a 5 year housing land supply - this maintains the primacy of the Development Plan but allows development adjacent to settlements in tiers 1-3 of the settlement hierarchy in the circumstances set out. Without such a policy approach there would be significant pressure for proposals for development on the edge of, or near to, settlements throughout the borough - which would be clearly unsustainable. This would be contrary to NPPF policy in para 170b that planning decisions should recognise the 'intrinsic character and beauty of the countryside’. To allow such development would lead to an un-planned gradual erosion of the character of the countryside and setting of settlements.

Page 696
Comment:
We previously highlighted that the integrity of the riparian (bank-side) habitat is a key component of the whole river system and should be maintained as a general principle, and also suggested that a 10m buffer should be maintained from the water’s edge for all main rivers and streams to allow space for wildlife in an undisturbed area. There is no response in the consultation summary on this matter, however, we note that Policy 31, point A) 3 refers to provision of appropriate buffers around wildlife features. Any proposals adjacent to a main river may be subject to Environmental Permitting requirements therefore, developers will also need to comply with our requirements where permits are granted.

Summary:
Policy 27 - Green Infrastructure - previously suggested a 10m buffer to riverbanks should be maintained to support habitats and public access. No response to this provided but note Policy 31 A3 refers to provision of appropriate buffers around wildlife features

Response:
Agree that other policies in the Local Plan would be relevant (Policy 31: Valuing Biodiversity & Geodiversity) and the approach of the whole local plan has been to avoid duplication wherever possible as some of the responses have been critical of the length of the document already.
Many parts of the Green Infrastructure network either contribute to the setting and appreciation of the Borough's heritage assets or are heritage assets in their own right (such as the Historic Parks and Gardens). We support this Policy which will help to ensure the continued protection and enhancement of this network.

**Summary:**
'Sound'. Many parts of the Green Infrastructure network either contribute to the setting and appreciation of the Borough's heritage assets or are heritage assets in their own right (such as the Historic Parks and Gardens). We support this Policy which will help to ensure the continued protection and enhancement of this network.

**Response:**
Support welcomed
Comment Ref: C/Policy 27/0077/6/018

Name: Campaign To Protect Rural England South Yorkshire
Organisation: Campaign to Protect Rural England South Yorkshire
Representing: 

Attend Examination: Attend Hearing

Reason: To assist the Inspector by using our submitted representations to answer his/her questions, particularly in light of the evidence submitted by other representors and any other matters the Inspector may raise.

Area: Chapter 10: Green Infrastructure
Policy: Policy 27: Green Infrastructure

Tests of Soundness: Positively prepared
Consistent with national

Comment:

GI A) 4 asks development to consider tranquillity. This does not go far enough in interpreting NPPF 180a which requires 'development to mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development - and avoid noise giving rise to significant adverse impacts on health and the quality of life, and wildlife'. PROPOSED CHANGE The language of this policy needs amending to strengthen protection relating to tranquillity.

Summary:

GI A) 4 asks development to consider tranquillity. This does not go far enough in interpreting NPPF 180a which requires 'development to mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development - and avoid noise giving rise to significant adverse impacts on health and the quality of life, and wildlife'. Proposed change: The language of this policy needs amending to strengthen protection relating to tranquillity.

Response:

Comment Noted. No proposed change. With regard to policy 27 A.4. It is for the developer to (through a GI masterplan) to consider tranquillity. There is no additional government guidance for strengthening protection relating to tranquillity.
3.26 Policy 27 sets out that the Council will protect, maintain and enhance (and where possible, extend or create) Doncaster’s green infrastructure (GI), which includes features such as open spaces and biodiversity, through several principles. The principles include, but are not limited to, the following: A) Proposals will be supported which contribute toward green infrastructure and have regard to the latest GI audits and strategies. The green infrastructure should principally benefit the development and also connect to the wider network. Major development proposals of 30 family dwellings or more will be required to provide a GI masterplan demonstrating how the development: 1. contributes toward delivering identified opportunities, priorities and address deficiencies; 2. creates or enhances green corridors, including rights of way; 3. provides specific and dedicated spaces for wildlife to encourage a more robust and connected network of habitats; 4. considers tranquillity and provide for generous biodiversity rich open spaces; 5. provides well designed and accessible, sport, recreation and children’s play space and food growing opportunities; 6. avoids loss or damage or deterioration to green infrastructure assets; 7. defines and softens the edges of settlements to provide a high quality transition between urban and rural areas particularly at urban greenfield extensions; 8. meets the Council’s requirements in terms of type, detailed siting, size, shape and design; 9. helps people and wildlife adapt to the impacts of climate change by including naturalised forms of flood storage and / or incorporating additional tree planting within developments, and; 10. provides for long term protection and climate change resilience through smart developments, management and maintenance. 3.27 We object to the current wording of Policy 27 due to the lack of clarity as to the measures that are required and the viability of providing these measures. Recommendation 3.28 The Council should seek to quantify Policy 27 by setting out the specific nature of matters required to satisfy the policy, in order to ensure that the policy is effective and therefore sound. If it is not possible to do so, the policy should be deleted. Justification 3.29 Policy 27 is inadequately clear in respect of measures needed to ensure compliance.

Response:

Comment Noted. Proposed to delete wording ‘30 houses’ and replace with 1 hectare, to cover all types of development. The specific nature of requirements to be satisfied are clearly identified in the bullet points of the policy. Given each development proposal is different, the starting point for the specific GI requirements can be identified through pre-application talks. Green infrastructure should be considered at the outset and addressed as an integral part of any new development. The supporting text clarifies what is needed. Applicants should be providing development proposals that deliver good quality, sustainable schemes and green infrastructure is an essential part of this. NPPF paragraph 20 (d) identifies strategic policies should make sufficient provision for green infrastructure. Paragraph 91 (c) identifies the role of green infrastructure in the achieving healthy and inclusive safe places. Paragraph 150 identifies that development in vulnerable areas can be managed through suitable adaptation measures, including through the planning of green infrastructure. Paragraph 181 identifies the importance of GI in Air Quality Management Areas and Clean Air Zones.
Comment:
We strongly welcome the content of part B of this policy, which relates to proposals adjacent or near to waterways. The general principles identified could significantly assist in promoting future use of the waterway corridors for public use, including walking and cycling (which would promote healthy lifestyles) and could also help promote waterside based regeneration activities. The wording provides clarity as to how development next to waterways should be designed to maximise the benefits of their location. We welcome amendments to the wording in part B, which makes it more explicit that the aims of this policy should apply to all proposals adjacent or near to waterways, which should maximise the opportunities for the borough to promote the use of its waterside space.

Summary:
We strongly welcome the content of part B of this policy, which relates to proposals adjacent or near to waterways. The general principles identified could significantly assist in promoting future use of the waterway corridors for public use, including walking and cycling (which would promote healthy lifestyles) and could also help promote waterside based regeneration activities. The wording provides clarity as to how development next to waterways should be designed to maximise the benefits of their location. We welcome amendments to the wording in part B, which makes it more explicit that the aims of this policy should apply to all proposals adjacent or near to waterways, which should maximise the opportunities for the borough to promote the use of its waterside space.

Response:
Support noted.
2.35 Policy 27 sets out that the Council will protect, maintain and enhance (and where possible, extend or create) Doncaster’s green infrastructure (GI), which includes features such as open spaces and biodiversity, through several principles. The principles include, but are not limited to, the following: a) Proposals will be supported which contribute toward green infrastructure and have regard to the latest GI audits and strategies. The green infrastructure should principally benefit the development and also connect to the wide network. Major development proposals of 30 family dwellings or more will be required to provide a GI masterplan demonstrating how the development: 1. contributes toward delivering identified opportunities, priorities and address deficiencies; 2. creates or enhances green corridors, including rights of way; 3. provides specific and dedicated spaces for wildlife to encourage a more robust and connected network of habitats; 4. considers tranquillity and provide for generous biodiversity rich open spaces; 5. provides well designed and accessible, sport, recreation and children’s play space and food growing opportunities; 6. avoids loss or damage or deterioration to green infrastructure assets; 7. defines and softens the edges of settlements to provide a high quality transition between urban and rural areas particularly at urban greenfield extensions; 8. meets the Council's requirements in terms of type, detailed siting, size, shape and design; 9. helps people and wildlife adapt to the impacts of climate change by including naturalised forms of flood storage and / or incorporating additional tree planting within developments, and; 10. provides for long term protection and climate change resilience through smart developments, management and maintenance. 2.36 We object to the current wording of Policy 27 due to the lack of clarity as to the measures that are required and the viability of providing these measures. Recommendation 2.37 The Council should seek to quantify Policy 27 by setting out the specific nature of matters required to satisfy the policy, in order to ensure that the policy is effective and therefore sound. If it is not possible to do so, the policy should be deleted. Justification 2.38 Policy 27 is inadequately clear in respect of measures needed to ensure compliance.

**Response:**

Comment Noted. Proposed to delete wording '30 houses' and replace with 1 hectare, to cover all types of development. The specific nature of requirements to be satisfied are clearly identified in the bullet points of the policy. Given each development proposal is different, the starting point for the specific GI requirements can be identified through pre-application talks. Green infrastructure should be considered at the outset and addressed as an integral part of any new development. The supporting text clarifies what is needed. Applicants should be providing development proposals that deliver good quality, sustainable schemes and green infrastructure is an essential part of this. NPPF paragraph 20 (d) identifies strategic policies should make sufficient provision for green infrastructure. Paragraph 91 (c) identifies the role of green infrastructure in the achieving healthy and inclusive safe places. Paragraph 150 identifies that development in vulnerable areas can be managed through suitable adaptation measures, including through the planning of green infrastructure. Paragraph 181 identifies the importance of GI in Air Quality Management Areas and Clean Air Zones.
We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Area: Chapter 10: Green Infrastructure
Policy: Policy 27: Green Infrastructure

Tests of Soundness:
Justified

Comment:
This policy places overly restrictive requirements on developers which could affect the deliverability of sites across the Borough. The requirement of a green infrastructure masterplan for all residential development proposals comprising more than 30 homes is unnecessarily onerous. Flexibility should be added to the policy to ensure that a green infrastructure masterplan is only required where it is clearly and demonstrably necessary. As it stands, the policy is not justified and does not provide an appropriate strategy.

Summary:
Policy 27 places overly restrictive requirements on developers which could affect the deliverability of sites across the Borough. The requirement of a green infrastructure masterplan for all residential development proposals comprising more than 30 homes is unnecessarily onerous. Flexibility should be added to the policy to ensure that a green infrastructure masterplan is only required where it is clearly and demonstrably necessary. As it stands, the policy is not justified and does not provide an appropriate strategy.

Response:
Comment noted. Proposed to delete wording '30 houses' and replace with 1 hectare, to cover all types of development. NPPF paragraph 20 (d) identifies strategic policies should make sufficient provision for green infrastructure. Paragraph 91 (c) identifies the role of green infrastructure in the achieving healthy and inclusive safe places. Paragraph 150 identifies that development in vulnerable areas can be managed through suitable adaptation measures, including through the planning of green infrastructure. Paragraph 181 identifies the importance of GI in Air Quality Management Areas and Clean Air Zones.
### Comment Ref:
C/Policy 27/04955/1/009

### Attend Examination:
Attend Hearing

### Reason:

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<th>Tests of Soundness</th>
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<tr>
<td>Positively prepared</td>
<td>Policy 27 - Green and Blue Infrastructure 1. Supports objectives of policy. 2. Objects to having to provide a separate Green Infrastructure document. 3. Should be covered by Local Validation checklist. 4. Requirement for a Green infrastructure plan should be removed from the Policy. 5. Questions the need for a green infrastructure plan and what ultimately it will achieve. 6. Most developments will include a landscape masterplan and a biodiversity management plan therefore a separate document is not needed. 7. Provision is not in conformity with NPPF.</td>
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### Response:
Comment noted. Proposed to delete wording '30 houses' and replace with 1 hectare, to cover all types of development. NPPF paragraph 20 (d) identifies strategic policies should make sufficient provision for green infrastructure. Paragraph 91 (c) identifies the role of green infrastructure in the achieving healthy and inclusive safe places. Paragraph 150 identifies that development in vulnerable areas can be managed through suitable adaptation measures, including through the planning of green infrastructure. Paragraph 181 identifies the importance of GI in Air Quality Management Areas and Clean Air Zones. the provision of a green infrastructure masterplan is best placed to provide this information.
2.38 The policy requires development proposals to provide a green infrastructure masterplan, in order to demonstrate how proposals will retain and/or enhance, as well as create new green infrastructure. As highlighted through the previous consultation window, our Client agrees that a policy should be included within the plan regarding green infrastructure, however they object to the contents of the policy as currently worded. 2.39 The requirement for a specific document should be dealt with via the Council’s local validation checklist, rather than within a planning policy. As such, the requirement for the green infrastructure plan should be removed from the policy. 2.40 In addition to the above, our Client questions the need to a green infrastructure plan and what ultimately it will achieve. Most developments will include a landscape masterplan and a biodiversity management plan and it is contended that such documents will provide the Council with sufficient comfort that green infrastructure will be addressed through proposed developments. To request that this information is then drawn together into another separate document is unnecessary and overly onerous. The policy is not justified, effective or in accordance with national planning guidance and as such is unsound, failing to meet the tests of paragraph 35 of the Framework.

Summary:
Policy 27 - Green and Blue Infrastructure 1. Supports objectives of policy. 2. Objects to having to provide a separate Green Infrastructure document. 3. Should be covered by Local Validation checklist 4. Requirement for a Green infrastructure plan should be removed from the Policy. 5. Questions the need for a green infrastructure plan and what ultimately it will achieve. 6. Most developments will include a landscape masterplan and a biodiversity management plan therefore a separate document is not needed. 7. Provision is not in conformity with NPPF.

Response:
Comment noted. Proposed to delete wording '30 houses' and replace with 1 hectare, to cover all types of development. NPPF paragraph 20 (d) identifies strategic policies should make sufficient provision for green infrastructure. Paragraph 91 (c) identifies the role of green infrastructure in the achieving healthy and inclusive safe places. Paragraph 150 identifies that development in vulnerable areas can be managed through suitable adaptation measures, including through the planning of green infrastructure. Paragraph 181 identifies the importance of GI in Air Quality Management Areas and Clean Air Zones. the provision of a green infrastructure masterplan is best placed to provide this information.
A number of Doncaster’s green infrastructure assets are identified on the Policies Map linked to specific policies such as open space, local wildlife and geological sites, woodlands, tree and hedgerows. A hierarchy of Green Infrastructure corridors, identifying key nodes, assets and project areas, has been developed in conjunction with Natural England. These connect or are capable of connecting green spaces to improve green infrastructure and wildlife connectivity. Comments: The Site is directly adjacent to an LNR/SSSI and is on and/or adjacent to the Sandal Beat/ Loversall Green and Bawtry Forest Infrastructure Corridors. This has been totally ignored in the assessment in considering whether or not this Site is suitable for development. The Site should be identified on the Policies Map as a green infrastructure asset.

Response:
Comment noted. The site (350/407) is identified as a housing sites not green space or green infrastructure (GI). Housing sites have developer requirements which will provide GI assets as part of the proposal.
The impacts of climate change are far reaching, with one of the simplest solutions being the incorporation of additional tree planting within new developments to alleviate temperature fluctuations and improve flood storage capacity. The additional tree planting will contribute toward achieving a low carbon borough by aspiring toward a tree canopy cover of 20% from 12.2% in 2018. Comments: In the context of the Local Plan's policies on Green Infrastructure, it makes no logical sense to destroy the Site which has a large number of mature trees and younger trees on it and expect that this can be compensated for by "additional tree planting within new developments". Contrary to the comment in 10.12 that this is "the simplest solution" to the impact of climate change, the simplest solution is clearly not to develop greenfield sites (such as the Site) which support a population of existing trees and other diverse flora and fauna but to develop brownfield or other sites not supporting such habitats. Further, non-development of the site will assist in DMBC's aspiration to be a low carbon borough and help in achieving the 20% tree canopy target. Destruction of the Site will be detrimental and counter-productive to achievement of this aim.

Summary:
Site Ref 350/407 - Rosehill - In the context of the Local Plan's policies on Green Infrastructure, it makes no logical sense to destroy the Site which has a large number of mature trees and younger trees on it and expect that this can be compensated for by "additional tree planting within new developments". Contrary to the comment in 10.12 that this is "the simplest solution" to the impact of climate change, the simplest solution is clearly not to develop greenfield sites (such as the Site) which support a population of existing trees and other diverse flora and fauna but to develop brownfield or other sites not supporting such habitats. Further, non-development of the site will assist in DMBC's aspiration to be a low carbon borough and help in achieving the 20% tree canopy target. Destruction of the Site will be detrimental and counter-productive to achievement of this aim.

Response:
Comment noted. The site (350/407) is identified as a housing sites not green space or green infrastructure (GI).
National planning policy requires new development to protect, restore, maintain, create, enhance and extend green infrastructure and improve connectivity within the network. Development is also required to be sustainable and compensate for damage to the environment whilst expecting the natural environment to function as an integrated network of habitats. Comments: The proposed development of Site 350/407 Rosehill/ The Avenue, Cantley ("the Site") is not in accordance with National Planning Policy. The Site is adjacent to an LNR/SSSI and is on and/or adjacent to the Sandal Beat/ Loversall Green and Bawtry Forest Infrastructure Corridors. Development of this Site will destroy rather than "protect, restore, maintain, create, enhance and extend" the green infrastructure network and will have an adverse impact on connectivity within the network. Further, development on this Site will clearly not be sustainable as the destruction of the diverse and mature natural environment on this Site cannot be compensated for by creation of open spaces elsewhere, or within the proposed development of the Site. The damage to the environment caused by development of this Site is severe and irreparable, especially given the site's location. Generally, the Local Plan is proposing development on a number of sites which will cause irreparable damage to the natural environment and is not sustainable.

**Summary:**

The proposed development of site Ref 350/407 - Rosehill is not in accordance with National Planning Policy. The Site is adjacent to an LNR/SSSI and is on and/or adjacent to the Sandal Beat/ Loversall Green and Bawtry Forest Infrastructure Corridors. Development of this Site will destroy rather than "protect, restore, maintain, create, enhance and extend" the green infrastructure network and will have an adverse impact on connectivity within the network. Further, development on this Site will clearly not be sustainable as the destruction of the diverse and mature natural environment on this Site cannot be compensated for by creation of open spaces elsewhere, or within the proposed development of the Site. The damage to the environment caused by development of this Site is severe and irreparable, especially given the site's location. Generally, the Local Plan is proposing development on a number of sites which will cause irreparable damage to the natural environment and is not sustainable.

**Response:**

Comment noted. The site (350/407) is identified as a housing sites not green space or green infrastructure (GI). Housing sites have developer requirements which will provide GI assets as part of the proposal.
Comment Ref: /Policy 27 - Para 10.2/05059/1/002

Reason: I would be willing to appear at the Examination if that would assist the Independent Planning Inspector. Please also do let me know if you have any queries.

Area: Chapter 10: Green Infrastructure

Policy: Policy 27: Green Infrastructure

Tests of Soundness:

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<th>Justified</th>
<th>Consistent with national</th>
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Comment:

The Council will protect, maintain, enhance and, where possible, extend or create Doncaster’s green infrastructure (GI), including landscapes, ecological networks, natural environment, open spaces, public rights of way, geodiversity, biodiversity, navigable river and waterway assets, through the following principles: Comments: Contrary to Policy 27, development of the Site will not:

- Create, contribute towards or enhance green corridors, including rights of way;
- Provide specific and dedicated spaces for wildlife to encourage a more robust and connected network of habitats; considers tranquillity and provide for generous biodiversity rich open spaces; or
- Avoid loss or damage or deterioration to green infrastructure assets. See further details below.

Summary:

Allocation Ref 350/407 - Rosehill - contradicts with this policy

Response:

Comment noted. The site (350/407) is identified as a housing sites not green space or green infrastructure (GI). Housing sites have developer requirements which will provide GI assets as part of the proposal.
### Comment:

9.1. Avant Homes is concerned with some aspects of Part A of Policy 27, that require a green infrastructure masterplan on schemes that provide 30 family dwellings or more. Avant Homes consider that this is unnecessarily onerous for schemes at this scale and consider that the Policy 27 is unsound.

9.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy

9.3. Avant Homes is concerned with part A of the policy which requires a green infrastructure masterplan for schemes of over 30 family dwellings. Whilst Avant Homes understands the aims and objectives of the policy, Avant Homes consider that the requirement for a Green Infrastructure Masterplan on schemes of this scale is unnecessarily onerous. The requirement to provide a masterplan will add to cost and impact on timescales for delivery, potentially adding up to a year to the planning process.

9.4. Flexibility therefore needs to be incorporated into Policy 27 so that the policy encourages rather than requires the provision of a masterplan for schemes over 30 family dwellings or the threshold should be significantly increased.

9.5. The requirement is not justified, it is unnecessarily onerous and does not provide an appropriate strategy. The Plan is its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy.

9.6. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound.

9.7. However, we consider that with increased flexibility in Part A of the Policy the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan.

9.8. To overcome the objection and address soundness matters, the Council should:
- Amend Policy 27 to include flexibility and "encourage" rather than "require" a green infrastructure masterplan or review the threshold that the policy applies.

### Summary:

Policy 27 - Green Infrastructure. 1. Part A is unnecessarily onerous. 2. Should be amended to 'encourage' rather than 'require' a green Infrastructure Masterplan. 3. Or.. Review the threshold for the policy to apply.

### Response:

Comment noted. Proposed to delete wording '30 houses' and replace with 1 hectare, to cover all types of development. NPPF paragraph 20 (d) identifies strategic policies should make sufficient provision for green infrastructure. Paragraph 91 (c) identifies the role of green infrastructure in the achieving healthy and inclusive safe places. Paragraph 150 identifies that development in vulnerable areas can be managed through suitable adaptation measures, including through the planning of green infrastructure. Paragraph 181 identifies the importance of GI in Air Quality Management Areas and Clean Air Zones. The provision of a green infrastructure masterplan is best placed to provide this information.
Comment Ref: C/Policy 27/05216/1/009

Attend Examination: Attend Hearing

Reason:

Area: Chapter 10: Green Infrastructure

Policy: Policy 27: Green Infrastructure

Tests of Soundness: Positively prepared Effective Justified Consistent with national

Comment:

9.1. Metroland is concerned with some aspects of Part A of Policy 27, that require a green infrastructure masterplan on schemes that provide 30 family dwellings or more. Metroland consider that this is unnecessarily onerous for schemes at this scale and consider that the Policy 27 is unsound. Test of Soundness 9.2. Metroland considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 9.3. Metroland is concerned with part A of the policy which requires a green infrastructure masterplan for schemes of over 30 family dwellings. Whilst Metroland understands the aims and objectives of the policy, Metroland consider that the requirement for a Green Infrastructure Masterplan on schemes of this scale is unnecessarily onerous. The requirement to provide a masterplan will add to cost and impact on timescales for delivery, potentially adding up to a year to the planning process. . 9.4. Flexibility therefore needs to be incorporated into Policy 27 so that the policy encourages rather than requires the provision of a masterplan for schemes over 30 family dwellings or the threshold should be significantly increased. 9.5. The requirement is not justified, it is unnecessarily onerous and does not provide an appropriate strategy. The Plan is its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 9.6. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 9.7. However, we consider that with increased flexibility in Part A of the Policy the Local Plan can be found sound. Metroland will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 9.8. To overcome the objection and address soundness matters, the Council should: - Amend Policy 27 to include flexibility and "encourage" rather than "require" a green infrastructure masterplan or review the threshold that the policy applies.

Summary:

Policy 27 - Green Infrastructure. 1. Part A is unnecessarily onerous. 2. Should be amended to 'encourage' rather than 'require' a green Infrastructure Masterplan. 3. Or, Review the threshold for the policy to apply.

Response:

Comment noted. Proposed to delete wording '30 houses' and replace with 1 hectare, to cover all types of development. NPPF paragraph 20 (d) identifies strategic policies should make sufficient provision for green infrastructure. Paragraph 91 (c) identifies the role of green infrastructure in the achieving healthy and inclusive safe places. Paragraph 150 identifies that development in vulnerable areas can be managed through suitable adaptation measures, including through the planning of green infrastructure. Paragraph 181 identifies the importance of GI in Air Quality Management Areas and Clean Air Zones. the provision of a green infrastructure masterplan is best placed to provide this information.
We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

This policy places overly restrictive requirements on developers which could affect the deliverability of sites across the Borough. The requirement of a green infrastructure masterplan for all residential development proposals comprising more than 30 homes is unnecessarily onerous. Flexibility should be added to the policy to ensure that a green infrastructure masterplan is only required where it is clearly and demonstrably necessary. As it stands, the policy is not justified and does not provide an appropriate strategy.

Comment Noted. Proposed to delete wording '30 houses' and replace with 1 hectare, to cover all types of development. NPPF paragraph 20 (d) identifies strategic policies should make sufficient provision for green infrastructure. Paragraph 91 (c) identifies the role of green infrastructure in the achieving healthy and inclusive safe places. Paragraph 150 identifies that development in vulnerable areas can be managed through suitable adaptation measures, including through the planning of green infrastructure. Paragraph 181 identifies the importance of GI in Air Quality Management Areas and Clean Air Zones.
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Many of the Borough's Conservation Areas Appraisals identify open spaces which are considered to make an important contribution to their character. The loss of these areas, therefore, would result in harm to their historic character. This aspect ought to be reflected in the Policy.

**PROPOSED CHANGE** Policy 28, Criterion B insert an additional Criterion: "The space does not contribute to the character of a Conservation Area or the setting of a designated heritage asset"

**Response:**
Noted and agree, additional criteria proposed (Main Modification) as per the suggested wording provided and as follows: Policy 28 - Protecting Open Space & Non Designated Open Space - Criteria B - new part 6. The space does not contribute to the character of a Conservation Area or the setting of a designated heritage asset.
We have concerns in respect of a proposed Local Green Spaces as defined on the Proposals Map (Criteria D of Policy 28). We do not support the allocation of site "West Farm Fields between High Road and Low Road West, Warmsworth" (Site 162) as a Local Green Space. This site is solely owned by our client and is private land not subject to a public right of way. It is acknowledged that as part of the emerging Local Plan, the Council invited representations for the allocation of sites for a range of uses. Alongside uses such as housing and employment, the Council also received requests to allocate some sites as 'Local Green Spaces', as per the NPPF. We would like to take this opportunity to comment and refute the proposed allocation of our client's land at Warmsworth as a Local Green Space. Local Green Space is a specific kind of allocation which seeks to preserve areas of Green Space that local communities believe to be significant and if allocated, the land would be protected from future development, similar to that of Green Belt. This response is in respect of land identified as "West Farm Fields between High Road and Low Road West, Warmsworth" (HELAA Site 162) where the Council has assessed the land as being potentially suitable for such an allocation. (SEE EMAIL FOR Figure 11 Aerial Image of West Farm Fields between High Road and Low Road West, Warmsworth). It can be confirmed that our client is the landowner of this site and it is our understanding that this site was submitted as a potential Local Green Space by the Parish Council. The reasons for the potential allocation is: The proposed green space is an irregular area consisting of several fields between Warmsworth House to the east and bounded by the High Road and Low Road West. Warmsworth House (grade 2 listed) and its converted barns and West Farm and its outbuildings (including a grade 2 listed barn) dominate the western half of the conservation area. From the High Road there are views across the fields to the Warmsworth House group and to the West Farm group which are enhanced by its elevated position. The fields to the west of the conservation area and the buildings of West Farm serve as an important reminder of the rural past of the area thus contributing to the setting of these farm buildings. These provide a visual break between the conservation area and the modern developments to the north and west and an attractive entrance point to the conservation area. Further adding to the historic character of the conservation area are the limestone walls with half round copings that bound the fields. The fields therefore are an important component of the historic character of the conservation area. Development of the fields would compromise this character over the western half of the conservation area and might be considered substantial harm in the language of the NPPF. As explained above the fields adjacent to the farm contribute to the character of the conservation area by providing a clear distinction between the historic character of the conservation area and more modern suburban developments. They allow the farm buildings to be seen in an agricultural context i.e. open fields with stone boundaries adjacent to the farm and also contribute in a similar way to the setting of Warmsworth House and the adjacent converted barn buildings. One caveat to this is that the West Farm buildings are clearly no longer suitable for modern agricultural practices and to conserve the buildings (and the character of the conservation area) new uses will need to be found. As well as the listed barn these limestone/clay pantile buildings contribute to the character of the conservation area. I would not wish to rule out some enabling development on the margins of the fields adjacent to the farm buildings if it led to the long term conservation of these buildings. What the above justification fails to confirm is that the western half of the site is already identified open space in the Doncaster UDP with the rest of the site located within a Residential Policy Area which supports future residential development. Please see an extract below for reference (Figure 12). (SEE EMAIL FOR Figure 12 - Extract from the UPD) We do not dispute this current policy position, however, we strongly contest that the eastern half of the site should be allocated as a Local Green Space. Some of the justification for the proposed allocation of the site as a Local Green Space is due to the site being within the Conservation Area and adjacent to Grade II Listed buildings. Whilst works affecting Listed Buildings or structures and Conservation Areas are subject to additional planning controls under the Planning (Listed Buildings and Conservation Areas) Act 1990, it does not create a blanket ban on development in such areas. Sympathetic development within a Conservation Area can often be an enhancement to an area. Again, with Listed Buildings, well-placed and designed development can act as enhancement. It is therefore considered that this is not strong enough justification to preclude development on this land and for allocating it as a Local Green Space. Another reason for the proposed allocation is its historic past. Whilst there is a rural past, this is not considered significant enough to preclude development in what is currently identified as a residential policy area. It is considered that development could occur whilst still protecting the limestone walls that bound the fields. Also, with the western parcel being retained as open space, this would still provide a visual break in the Conservation Area whilst enabling the eastern half of the site to be used in an effective an efficient manner. Furthermore the trees to the north of the site would remain along the highways verge providing a green strip along High Road. Additionally, this land is in private ownership and is not therefore open to the public. The site is not subject to any Public Rights of Way (see Figure 13 below for reference). (SEE EMAIL FOR Figure 13 Extract from the Doncaster Council’s online Public Right of Way Walking Map) As set out in the justification for the proposal allocation, the Council states that it would not wish to rule out some enabling development on the margins of the fields adjacent to the farm buildings if it led to the long term conservation of these buildings: “the West Farm buildings are clearly no longer suitable for modern agricultural practices and to conserve the buildings (and the character of the conservation area) new uses will need to be found”. In this instance, the flexibility of the surrounding area will need to be maintained in order to develop a proposal which sits sensitively amid the Conservation Area and adjacent listed buildings and therefore allocating the land as a Local Green Space would hinder the future uses of the land and buildings which, could have a significant impact on the actual heritage assets in the area. Proposals could be prepared to be of appropriate scale and massing, and to not pose an adverse impact on the Conservation Area. It is considered that there are no
overriding heritage constraints, which should prohibit development on this site. As such, we strongly contest the allocation of the Local Green Space for the above reasons and therefore request that the land remains as it is currently identified in the UDP Proposals Map or identified as a housing site for a sensitively designed scheme. We therefore request that "West Farm Fields between High Road and Low Road West, Warmsworth" (Site 162) is deleted as a Local Green Space in the emerging Local Plan and either retains its current designations as part open space and part residential area or is wholly identified as a housing allocation.

Response:
Local Green Space can be on private land, although we would not accept certain arguments on private land unless there is sufficient evidence (e.g. saying the site is of recreational value). However, in the case of historical significance, lack of public access / private ownership / no Public Rights of Way is not necessarily a barrier to allocating a site as Local Green Space. Land does not have to be submitted by the landowner to be considered for this use. It is acknowledged that half the site is already open space as per the UDP, however the Local Plan is replacing this document and thus reconsidering the approach. As noted, the Local Green Space justification for this site does not rule out the margins of the fields being used as enabling development, but for the reasons stated in the Local Green Space document, it is deemed suitable to allocate this site for this reason. If an application were to come forward for such development, it would need to demonstrate "very special circumstances" in line with Green Belt policy, however being as it has already been noted by the Conservation Officer that this would be acceptable in principle, we are confident an appropriate application and justification for this marginal development could be made. This would thus not prevent the allocation of this land as Local Green Space. Arguments related to the ability of development to positively impact on a conservation area are general points and not site specific? the fact development could occur here does not necessarily outweigh the reasons for allocating the site as Local Green Space. Furthermore, the features that could be preserved by developing the site would unquestionably be better preserved by not developing it.
We wish to discuss with the Inspector and Council our concerns regarding the Open Space allocation at Warmsworth. There is detailed evidence which will need to be discussed orally.

Policy: Policy 28: Protecting Open Space & Non Designated Open Space

Tests of Soundness: Positively prepared Justified
Effective Consistent with national

Comment:

We have concerns in respect of a proposed Local Green Spaces as defined on the Proposals Map (Criteria D of Policy 28). We do not support the allocation of site "West Farm Fields between High Road and Low Road West, Warmsworth" (Site 162) as a Local Green Space. This site is solely owned by our client and is private land not subject to a public right of way. It is acknowledged that as part of the emerging Local Plan, the Council invited representations for the allocation of sites for a range of uses. Alongside uses such as housing and employment, the Council also received requests to allocate some sites as 'Local Green Spaces', as per the NPPF. We would like to take this opportunity to comment and refute the proposed allocation of our client's land at Warmsworth as a Local Green Space. Local Green Space is a specific kind of allocation which seeks to preserve areas of Green Space that local communities believe to be significant and if allocated, the land would be protected from future development, similar to that of Green Belt. This response is in respect of land identified as "West Farm Fields between High Road and Low Road West, Warmsworth" (HELAA Site 162) where the Council has assessed the land as being potentially suitable for such an allocation. (SEE EMAIL FOR Figure 11 Aerial Image of West Farm Fields between High Road and Low Road West, Warmsworth). It can be confirmed that our client is the landowner of this site and it is our understanding that this site was submitted as a potential Local Green Space by the Parish Council. The reasons for the potential allocation is: The proposed green space is an irregular area consisting of several fields between Warmsworth House to the east and bounded by the High Road and Low Road West. Warmsworth House (grade 2 listed) and its converted barns and West Farm and its outbuildings (including a grade 2 listed barn) dominate the western half of the conservation area. From the High Road there are views across the fields to the Warmsworth House group and to the West Farm group which are enhanced by its elevated position. The fields to the west of the conservation area and the buildings of West Farm serve as an important reminder of the rural past of the area thus contributing to the setting of these farm buildings. These provide a visual break between the conservation area and the modern developments to the north and west and an attractive entrance point to the conservation area. Further adding to the historic character of the conservation area are the limestone walls with half round copings that bound the fields. The fields therefore are an important component of the historic character of the conservation area. 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Whilst works affecting Listed Buildings or structures and Conservation Areas are subject to additional planning controls under the Planning (Listed Buildings and Conservation Areas) Act 1990, it does not create a blanket ban on development in such areas. Sympathetic development within a Conservation Area can often be an enhancement to an area. Again, with Listed Buildings, well-placed and designed development can act as enhancement. It is therefore considered that this is not strong enough justification to preclude development on this land and for allocating it as a Local Green Space. Another reason for the proposed allocation is its historic past. Whilst there is a rural past, this is not considered significant enough to preclude development in what is currently identified as a residential policy area. It is considered that development could occur whilst still protecting the limestone walls that bound the fields. 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(SEE EMAIL FOR Figure 13 Extract from the Doncaster Council’s online Public Right of Way Walking Map) As set out in the justification for the proposal allocation, the Council states that it would not wish to rule out some enabling development on the margins of the fields adjacent to the farm buildings if it led to the long term conservation of these buildings: “the West Farm buildings are clearly no longer suitable for modern agricultural practices and to conserve the buildings (and the character of the conservation area) new uses will need to be found”. In this instance, the flexibility of the surrounding area will need to be maintained in order to develop a proposal which sits sensitively amid the Conservation Area and adjacent listed buildings and therefore allocating the land as a Local Green Space would hinder the future uses of the land and buildings which, could have a significant impact on the actual heritage assets in the area. Proposals could be prepared to be of appropriate scale and massing, and to not pose an adverse impact on the Conservation Area. It is considered that there are no
overriding heritage constraints, which should prohibit development on this site. As such, we strongly contest the allocation of the Local Green Space for the above reasons and therefore request that the land remains as it is currently identified in the UDP Proposals Map or identified as a housing site for a sensitively designed scheme. We therefore request that "West Farm Fields between High Road and Low Road West, Warmsworth" (Site 162) is deleted as a Local Green Space in the emerging Local Plan and either retains its current designations as part open space and part residential area or is wholly identified as a housing allocation.

Summary:

Do not support the allocation of site "West Farm Fields between High Road and Low Road West, Warmsworth" (Site 215 referred to as 162 in representation) as a Local Green Space (Criteria D of Policy 28). We do not support the allocation of site "West Farm Fields between High Road and Low Road West, Warmsworth" (Site 162) as a Local Green Space. This site is solely owned by our client and is private land not subject to a public right of way. It is acknowledged that as part of the emerging Local Plan, the Council invited representations for the allocation of sites for a range of uses. Alongside uses such as housing and employment, the Council also received requests to allocate some sites as 'Local Green Spaces', as per the NPPF. We would like to take this opportunity to comment and refute the proposed allocation of our client's land at Warmsworth as a Local Green Space. 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I would not wish to rule out some enabling development on the margins of the fields adjacent to the farm buildings if it led to the long term conservation of these buildings. What the above justification fails to confirm is that the western half of the site is already identified open space in the Doncaster UDP with the rest of the site located within a Residential Policy Area which supports future residential development. Please see an extract below for reference (Figure 12). (SEE EMAIL FOR Figure 12 - Extract from the UDP) We do not dispute this current policy position, however, we strongly contest that the eastern half of the site should be allocated as a Local Green Space. Some of the justification for the proposed allocation of the site as a Local Green Space is due to the site being within the Conservation Area and adjacent to Grade II Listed buildings. Whilst works affecting Listed Buildings or structures and Conservation Areas are subject to additional planning controls under the Planning (Listed Buildings and Conservation Areas) Act 1990, it does not create a blanket ban on development in such areas. Sympathetic development within a Conservation Area can often be an enhancement to an area. Again, with Listed Buildings, well-placed and designed development can act as enhancement. It is therefore considered that this is not strong enough justification to preclude development on this land and for allocating it as a Local Green Space. Another reason for the proposed allocation is its historic past. Whilst there is a rural past, this is not considered significant enough to preclude development in what is currently identified as a residential policy area. It is considered that development could occur whilst still protecting the limestone walls that bound the fields. Also, with the western parcel being retained as open space, this would still provide a visual break in the Conservation Area whilst enabling the eastern half of the site to be used in an effective an efficient manner. Furthermore the trees to the north of the site would remain along the highways verge providing a green strip along High Road. Additionally, this land is in private ownership and is not therefore open to the public. The site is not subject to any Public Rights of Way (see Figure 13 below for reference). (SEE EMAIL FOR Figure 13 Extract from the Doncaster Council's online Public Right of Way Walking Map). As set out in the justification for the proposal allocation, the Council states that it would not wish to rule out some enabling development on the margins of the fields adjacent to the farm buildings if it led to the long term conservation of these buildings: "the West Farm buildings are clearly no longer suitable for modern agricultural practices and to conserve the buildings (and the character of the conservation area) new uses will need to be found". In this instance, the flexibility of the surrounding area will need to be maintained in order to develop a proposal which sits sensitively amid the Conservation Area and adjacent listed buildings and therefore allocating the land as a Local Green Space would hinder the future uses of the land and buildings which, could have a significant impact on the actual heritage assets in the area. Proposals could be prepared to be of appropriate scale and massing, and to not pose an adverse impact on the Conservation Area. It is considered that there are no overriding heritage constraints, which should prohibit development on this site. As such, we strongly contest the allocation of the Local Green Space for the above reasons and therefore request that the land remains as it is currently identified in the UDP Proposals Map or identified as a housing site for a sensitively designed scheme. We therefore request that "West Farm Fields between High Road and Low Road West, Warmsworth" (Site 162) is deleted as a Local Green Space in the emerging Local Plan and either retains its current designations as part open space and part residential area or is wholly identified as a housing allocation.
Response:

Local Green Space can be on private land, although we would not accept certain arguments on private land unless there is sufficient evidence (e.g. saying the site is of recreational value). However, in the case of historical significance, lack of public access / private ownership / no Public Rights of Way is not necessarily a barrier to allocating a site as Local Green Space. Land does not have to be submitted by the landowner to be considered for this use. It is acknowledged that half the site is already open space as per the UDP, however the Local Plan is replacing this document and thus reconsidering the approach. As noted, the Local Green Space justification for this site does not rule out the margins of the fields being used as enabling development, but for the reasons stated in the Local Green Space document, it is deemed suitable to allocate this site for this reason. If an application were to come forward for such development, it would need to demonstrate "very special circumstances" in line with Green Belt policy, however as it has already been noted by the Conservation Officer that this would be acceptable in principle, we are confident an appropriate application and justification for this marginal development could be made. This would thus not prevent the allocation of this land as Local Green Space. Arguments related to the ability of development to positively impact on a conservation area are general points and not site specific - the fact development could occur here does not necessarily outweigh the reasons for allocating the site as Local Green Space. Furthermore, the features that could be preserved by developing the site would unquestionably be better preserved by not developing it.
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Summary:
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Summary:

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Response:

Tests of Soundness:

Summary:

Response:

Comment noted. Policy 28 is not negatively worded. In line with paragraphs, 96 and 97 of the NPPF the policy protects open spaces and provides clarity on acceptable types of development in open space areas.
Tests of Soundness:

Comment:

2.41 Our Client would question the Council's negatively worded approach to the development of non-designated open space in part b) of the policy. This issue was raised at the previous consultation stage but our comments still stand: Effectively any parcel of land which is not protected in the Local Plan as open space would therefore be classed as non-designated open space. Clearly this is not the intention of the Revised Framework, to sterilise all open space, and as such we object to this element of the policy.

Summary:

Policy 28 Part (b) Negatively worded approach to the development of non-designated open space. Effectively any parcel of land which is not protected in the Local Plan as open space would therefore be classed as non-designated open space. Clearly this is not the intention of the Revised Framework, to sterilise all open space, and as such we object to this element of the policy.

Response:

Comment noted. Policy 28 is not negatively worded. In line with paragraphs, 96 and 97 of the NPPF the policy protects open spaces and provides clarity on what is acceptable in these areas.
Comment Ref: /Para 10.13/05059/1/006
Attend Examination: Attend Hearing
Reason: I would be willing to appear at the Examination if that would assist the Independent Planning Inspector. Please also do let me know if you have any queries.
Area: Chapter 10: Green Infrastructure
Policy: Policy 28: Protecting Open Space & Non Designated Open Space
Tests of Soundness: Justified  Consistent with national
Comment:
Open space is an important part of green infrastructure provision. Identifying and protecting accessible open spaces will contribute toward creating an environment where access to activities is made easier and public health improved. Our urban open spaces are important resources offering a range of uses, with a value to local communities over and above their existing or primary use. As well as recreation and community resource open spaces can act as buffers between the urban edge and the countryside and screening between incompatible uses and of unattractive development. Comments: The Site is currently a site of local community value as it is publicly accessible and is widely used by horse riders, joggers, bird watchers, walkers and residents for recreation. The Local Plan recognises that open space such as the Site is an important part of green infrastructure provision and given that the Site fulfils all the criteria of an Open space (e.g. a space of significant value to the local community, a buffer between the urban edge and the countryside - in this case, a LNR/SSSI, etc), it should have been designated as such in the Local Plan instead of being earmarked for development.
Summary:
Site Ref 350/407 - Rosehill - The Site is currently a site of local community value as it is publicly accessible and is widely used by horse riders, joggers, bird watchers, walkers and residents for recreation. The Local Plan recognises that open space such as the Site is an important part of green infrastructure provision and given that the Site fulfils all the criteria of an Open space (e.g. a space of significant value to the local community, a buffer between the urban edge and the countryside - in this case, a LNR/SSSI, etc), it should have been designated as such in the Local Plan instead of being earmarked for development.
Response:
Comment noted. The site (350/407) is identified as a housing sites not green space or green infrastructure (GI). Housing sites have developer requirements which will provide GI assets as part of the proposal.
Comment Ref: /Para 10.15/05059/1/007

Attend Examination: Attend Hearing

Reason: I would be willing to appear at the Examination if that would assist the Independent Planning Inspector. Please also do let me know if you have any queries.

Area: Chapter 10: Green Infrastructure

Policy: Policy 28: Protecting Open Space & Non Designated Open Space

Tests of Soundness:

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Comment:
The recreational quality of open space can be eroded by insensitive development or incremental loss of a site ?.. Ultimately the development has to result in an overall improvement to the site, be sensitive to the local situation, result in no significant loss of open space and provide significant benefits to the users. Comments: Development of the Site is clearly insensitive and will result in the total loss of an open space site contrary to paragraph 10.15 of the Local Plan. The recreational quality of the Site will be completely destroyed and lost by its development. Further, development will NOT result in any overall improvement to the Site or the local community, completely ignores the local community’s wishes and objections, and will result in significant loss of open space and provide no benefits whatsoever to the local community. As noted earlier and in previous objections, development of the Site will bring significant and irreparable loss of amenity to the existing local community by destroying a local Open Space. In addition, in this regard: - The existing road system will be unable to cope adequately with the thousands of extra vehicle movements; - The increase in population density due to development on the Site will destroy the quiet and tranquil nature of the surrounding neighbourhood; and - The open aspect of the neighbourhood will be destroyed by the development, changing its character forever.

Summary:
Site Ref 350/407 - Rosehill - Development of the Site is clearly insensitive and will result in the total loss of an open space site contrary to paragraph 10.15 of the Local Plan. The recreational quality of the Site will be completely destroyed and lost by its development. Further, development will NOT result in any overall improvement to the Site or the local community, completely ignores the local community’s wishes and objections, and will result in significant loss of open space and provide no benefits whatsoever to the local community. As noted earlier and in previous objections, development of the Site will bring significant and irreparable loss of amenity to the existing local community by destroying a local Open Space. In addition, in this regard: - The existing road system will be unable to cope adequately with the thousands of extra vehicle movements; - The increase in population density due to development on the Site will destroy the quiet and tranquil nature of the surrounding neighbourhood; and - The open aspect of the neighbourhood will be destroyed by the development, changing its character forever.

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Comment noted. The site (350/407) is identified as a housing sites not green space or green infrastructure (GI). Housing sites have developer requirements which will provide GI assets as part of the proposal.
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Comment:

In line with national planning policy there are a number of areas identified as 'local green space', identified by local communities as being important to them for a number of locally significant reasons including, proximity to the community, beauty, richness of wildlife, recreational value or adding to the local character of the area. These areas are also identified on the Policies Map. Comments: As noted earlier, the Site should have been identified as a local green space in line with national planning policy. The local community has identified - and uses - the Site as such but these objections have been ignored despite the Site being demonstrably important to them for the reasons set out in paragraph 10.17 of the Local Plan.

Summary:

Site Ref 350/407 - Rosehill - The Site should have been identified as a local green space in line with national planning policy. The local community has identified - and uses - the Site as such but these objections have been ignored despite the Site being demonstrably important to them for the reasons set out in paragraph 10.17 of the Local Plan.

Response:

Comment noted. The site (350/407) is identified as a housing sites not green space or green infrastructure (GI). Housing sites have developer requirements which will provide GI assets as part of the proposal.
Comment Ref: /Para 10.18/05059/1/010

Attend Examination: Attend Hearing

Reason: I would be willing to appear at the Examination if that would assist the Independent Planning Inspector. Please also do let me know if you have any queries.

Area: Chapter 10: Green Infrastructure

Policy: Policy 28: Protecting Open Space & Non Designated Open Space

Tests of Soundness:

Justified Consistent with national

Comment:

National Planning Policy states that 'existing open space, sports and recreational buildings and land, including playing fields, should not be built on, without prior consideration. Development proposals resulting in the permanent loss of the open space will be therefore be required to: - demonstrate the land provides no benefit to the community and the local community supports alternative proposals; - demonstrate through an independent assessment that the land or buildings are surplus to requirement; - ensure the need for and benefits of the development outweighs the loss; and - provide compensation for loss of facilities. Comment: Development of the Site will clearly result in the permanent loss of the open space and clearly breaches the criteria set out in paragraph 10.18 as follows: The land provides significant benefit to the community as noted earlier. The local community does not support the development and supports alternative proposals (i.e. designate as an Open Space and retain as a diverse and rich ecological environment). There are a large number of houses being built in Doncaster and a large number already built for sale. The development of a greenfield and ecological rich and diverse site should not be contemplated under the circumstances. There are no benefits of the development. The loss caused by the development of the Site will be considerable, far-reaching and detrimental to the local community both in terms of the loss of the Site and the loss of amenity caused by such a significant development and given the existing infrastructure of the adjacent development. There is no means by which adequate compensation can be provided for the irreparable loss of a significant open space used by the local community and which is a diverse and rich ecological environment.

Summary:

Site Ref 350/407 - Rosehill - Development of the Site will clearly result in the permanent loss of the open space and clearly breaches the criteria set out in paragraph 10.18 as follows. The land provides significant benefit to the community as noted earlier. The local community does not support the development and supports alternative proposals (i.e. designate as an Open Space and retain as a diverse and rich ecological environment). There are a large number of houses being built in Doncaster and a large number already built for sale. The development of a greenfield and ecological rich and diverse site should not be contemplated under the circumstances. There are no benefits of the development. The loss caused by the development of the Site will be considerable, far-reaching and detrimental to the local community both in terms of the loss of the Site and the loss of amenity caused by such a significant development and given the existing infrastructure of the adjacent development. There is no means by which adequate compensation can be provided for the irreparable loss of a significant open space used by the local community and which is a diverse and rich ecological environment.

Response:

Comment noted. The site (350/407) is identified as a housing sites not green space or green infrastructure (GI). Housing sites have developer requirements which will provide GI assets as part of the proposal. The Local Plan has to balance the needs of development and protection of natural assets.
The Council will resist any development proposals resulting in the permanent loss of open space, especially in deficient areas. However, we also acknowledge that not all open space is of value to the local community - in such cases community consultation will be carried out and an assessment will be required to identify whether the site is suitable for a different type of open space use in the first instance or a beneficial local community use in the second instance. Permanent loss of open space will require careful consideration as this can result in increased pressure on remaining facilities. Development of the Site is contrary to this paragraph which claims that the Council will resist development proposals which result in the permanent loss of open space - which this demonstrably will. Comment: No consultation has been carried out with the community, or assessment performed, to identify whether the Site "is suitable for a different type of open space use in the first instance or a beneficial local community use in the second instance."

Comment noted. The site (350/407) is identified as a housing sites not green space or green infrastructure (GI). Housing sites have developer requirements which will provide GI assets as part of the proposal.
Comment Ref: /Policy 28/05059/1/009

Attend Examination: Attend Hearing

Reason: I would be willing to appear at the Examination if that would assist the Independent Planning Inspector. Please also do let me know if you have any queries.

Area: Chapter 10: Green Infrastructure

Policy: Policy 28: Protecting Open Space & Non Designated Open Space

Tests of Soundness:

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Comment:
The Council will protect open spaces which provide important opportunities for formal and informal recreation as well as those which provide a social, cultural and ecological role. B) Within non-designated open space, development proposals will only be supported where: 1. casual playing space is unaffected; 2. buffers between incompatible uses are unaffected; 3. visual amenity is retained and enhanced; 4. nature conservation improvements are the key driver; and 5. green infrastructure connections are retained. C) Development proposals on ‘Local Green Space’, defined on the Policies Map, will be considered in accordance with national and local policy and guidance. D) Proposals involving the loss of open space policy areas, recreational buildings and non-designated open space, such as playing fields, will only be supported: 1. in accordance with national policy, and 2. where community support can be demonstrated through public consultation. Comments: Development of the Site is contrary to Policy 28 for the following reasons: The Site is an open space which provides informal recreation and fulfils a social and ecological role to the local community and the borough as a whole (due to its location next to an LNR/SSSI). Development of the Site does not protect it in any way. The Site should have been designated an Open Space. In any event, as a non-designated open space, clearly development of the Site will result in all five criteria for development in such areas being breached, and therefore under Policy 28, the development proposal cannot be supported. In particular, it is evident that contrary to Policy 28, development of the Site:

- Will completely destroy the present space of the Site which is used for recreational purposes by a wide variety of users;
- Will adversely impact buffers between the LNR/SSSI and other adjoining areas;
- Will not retain or enhance visual amenity;
- Does not have nature conservation improvements as a key driver; and
- Will not ensure green infrastructure connections are retained. The Site should have been designated a Local Green Space. No explanation has been provided by DMBC as to why this is not the case. Were the Site designated a Local Green Space, the Site would not be developed. The proposal to development the Site will result in the loss of open space. There has been vociferous and vigorous objections to the development of the Site by the local community and development of the site has no community support whatsoever. Development of the Site is therefore: - Not a proposal in accordance with national policy; and - Is not a proposal where there is any community support whatsoever and for which no support through public consultation has been, or will be able to be, demonstrated.

Summary:
Site Ref 350/407 - Rosehill - Development of the Site is contrary to Policy 28. The Site is an open space which provides informal recreation and fulfils a social and ecological role to the local community and the borough as a whole (due to its location next to an LNR/SSSI). Development of the Site does not protect it in any way. The Site should have been designated an Open Space. In any event, as a non-designated open space, clearly development of the Site will result in all five criteria for development in such areas being breached, and therefore under Policy 28, the development proposal cannot be supported. The Site should have been designated a Local Green Space. No explanation has been provided by DMBC as to why this is not the case. Were the Site designated a Local Green Space, the Site would not be developed. The proposal to development the Site will result in the loss of open space. There has been vociferous and vigorous objections to the development of the Site by the local community and development of the site has no community support whatsoever.

Response:
Comment noted. The site (350/407) is identified as a housing sites not green space or green infrastructure (GI). Housing sites have developer requirements which will provide GI assets as part of the proposal.
### Summary

Objection is made to this Policy and the allocation of the land at rear of Manor Farm Braithwell as open space. The land in question does not have any value for formal or informal recreation and it is not necessary for the land to be designated as open space. The land is currently part of a working farm and the designation will impede the economic use of the land as part of the land holding and inhibit its agricultural potential. The land remains allocated for housing in the UDP document as part of a larger site in Braithwell. There is no reason to delete the site from the development boundary and include it as an open space designation. The land is suitable for a small scale residential development that pays detailed attention to the Conservation Area context and which would provide for quality new homes in the settlement. Braithwell is a village which will support residential development within the development limit as recognised in the settlement hierarchy. Objection is made to the background documents that assess Local Green Space. The land is noted in the Community Profiles as being of local community value. As Site 1015 it is also noted in the Audit document which sets out that the site is valuable because it will restrict development in this part of the Conservation Area. Local greenspace should not be used as a backdoor way to prevent development taking place. The planning controls already in place over the land, which lies within the Conservation Area already protect the trees on the land, the setting of the nearby Listed buildings are also protected. There is no requirement for a further layer of planning control to protect the land and this is seen as a misuse of the allocation of open space. The plan as drafted is imprecise about the distinction between land allocated for open space purposes and land designated as local green space. There is no way from telling from the plan the purposes of the designation on the proposals map, which simply states open space. PROPOSED CHANGE: The plan should be modified to - Remove the open space designation from the proposals map.

### Tests of Soundness

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### Response

Agree that the map needs amending to differentiate between Local Green Space and Public Open Space. The Local Green Space methodology document makes no case for this site to be allocated due to its recreational value, and if it did so then the case would likely be refused as the site is privately owned and not publicly accessible? However it does make the case that the site has historical merit and therefore in such cases, public access is not necessary to allocate a site Local Green Space for this purpose. Unclear as why this allocation would impede the agricultural ability of the farm when it would help preserve the use? However the housing would be detrimental to the agricultural ability of the farm. The development limit is proposed to drawn to exclude this field and Braithwell has not been assessed as a sustainable settlement for growth, nor is it earmarked to receive any allocations. Housing would not be supported on this site. The designation is not being used as a backdoor way to prevent development, rather it is preserving the site for it's historical value, as set out in the NPPF.
Comment Ref: /Proposals Map Braithwell/05188/1/001

Attend Examination: Attend Hearing

Reason: We act for a number of major land owners in the Doncaster area, we have detailed knowledge of the sites and the planning history of the Borough. We have previously been involved with the Core Strategy Plan and with the Examination of the draft Sites and Policies DPD. Our knowledge of the various land parcels, ownerships, the strategic land position and site specific details, means that we have information to inform the debate regarding the overall housing requirement and the specific allocation of sites which will assist the examination.

Area: Chapter 10: Green Infrastructure

Policy: Policy 28: Protecting Open Space & Non Designated Open Space

Tests of Soundness: Positively prepared Effective Legally Compliant

Justified Consistent with national

Comment:

Objection is made to the Proposals Map as submitted. The Plan proposes the allocation of the land at the rear of Manor Farm to be allocated as public open space and to take it out of residential policy area as shown in the current UDP. PROPOSED CHANGE: The plan should be modified to - Amend the development boundary of Braithwell to include the site within it. - Remove the open space designation from the proposals map - Amend the green belt boundary to omit Manor Farm from the green belt

Summary:

Objection is made to the Policies Map which proposes the allocation of land to the rear of Manor Farm, Braithwell, as public open space and to take it out of residential policy area as shown in the current UDP. The plan should be modified to - Amend the development boundary of Braithwell to include the site within it. - Remove the open space designation from the Policies Map - Amend the Green Belt boundary to omit Manor Farm from the Green Belt.

Response:

It is not proposed to make the changes as requested by the Representation so therefore there is no need to amend the Policies Map (notwithstanding the need to clarify the difference between open spaces and sites of local green space value) - see response to Policy 28 Representation/objection.
It may be necessary to attend the relevant hearing session in order to answer any questions the Inspector may have regarding the previous, current and future use of this site within the plan period.

Policy: Policy 28: Protecting Open Space & Non Designated Open Space

Introduction: Peacock and Smith have been instructed to prepare this representation on behalf of Barnby Dun with Kirk Sandall Parish Council. This representation concerns a specific site off Sutton Road which is currently allocated as open space in the adopted UDP and continues to be allocated for Open Space, Sport and Recreation in the submission draft Local Plan despite the site not being used for this purpose since 2007. On this basis we consider that the submission draft Local Plan is unsound as it is not justified, effective or consistent with National Policy. This is explained in further detail under the subheadings below. A site location plan is submitted along site this representation at Appendix 1. (SEE EMAIL FOR Appendices) History and Context: The site, owned by Barnby Dun with Kirk Sandall Parish Council, was previously used as a playground up to the year 2007 and is currently allocated as open space on the UDP proposals map. During the Parish Council meeting on 15 August 2007 the decision was made to close the park. In September 2007 the Parish Council served an ‘indefinite closure’ notice on local residents, notifying them that the Sutton Road Park would be closed indefinitely. A copy of this notice is attached at Appendix 2. The notice was displayed at the entrance to the site and distributed to local residents. The Parish Council have not received any adverse feedback regarding the closure of the park. In September 2007 the existing gates to the park were chained shut and have remained so ever since. The main reason for closing the park was due to surface water flooding. The park is located entirely within flood zone 1. However, a layer of clay which is approximately 3 metres deep across the surface of the park results in poor drainage and causes surface water flooding. This caused a health and safety hazard to those using the park, especially children. Each time the park flooded it cost the Parish Council #900 or more, to reset the safety matting around the play equipment which was dislodged due to the surface water flooding. Even small amounts of rain caused the matting to float due to the poor site drainage. Originally it was the Parish Council’s intention to obtain grant funding to resolve the drainage issue and to replace the play equipment on the site. The Parish Council submitted a WREN funding bid in 2007 which was unsuccessful. The Parish Council has been unable to secure funding to resolve the drainage issues at the site to enable the park to be reopened. The secondary issue for closing the playground was due to anti-social behaviour which took place in the park when it was open and the difficulty experience by the Parish Council managing the site. Since it was closed the site has not been accessible to members of the public. However, a further amenity related issue has arisen; neighbouring houses have thrown rubbish over fences which has resulted in a fly tipping issue on the site. The Parish Council first explored the use of the site for housing in 2009 when they engaged with [Case Officer] at DMBC. More recently the Parish Council has further progressed this opportunity and appointed an architect to consider different residential options on the site. This use would generate enough monies to address the drainage issues on the site and allow for redevelopment. Despite not being used as a playground since September 2007 the site remains allocated as open space in the submission draft Local Plan, as shown in the extract pasted below. (SEE EMAIL FOR Figure. 1. Extract from submission draft plan proposals map) Soundness of the submission draft Local Plan in the context of site of Sutton Road: Lack of justification: There is no justification provided by the Council within the submission draft Local Plan or the evidence base to explain why the site has been retained as an allocation for open space when it has not functioned as such for 12 years. The site is identified as ‘informal’ open space (ref: 795) on the Community Profile Area Green Spaces map for Kirk Sandall. The Council’s report ‘Local Green Space Methodology and Sites’ (2019) considers the sites put forward for open space allocation as part of the call for sites process. However the assessment does not go as far as to re-assess existing allocations from the UDP. As such, the Council have not considered that the site no longer contributes to open space in an informal manner or otherwise. On this basis the retention of the site as an open space allocation is considered unjustified. Ineffectiveness: Open space Policies 27 and 28 are of relevance to sites allocated for open space within the submission draft plan. Policy 27: Green Infrastructure states that the Council will protect, maintain, enhance green infrastructure. The policy goes onto list a number of criteria which will contribute to achieving this. As the site has been closed for 12 years there is no public benefit in terms of play space. As explained above, there is no possibility of the site being reopened as a playground due to the lack of funding available to the Parish Council to rectify the drainage issues. There is also a residential amenity issue which has arisen from fly tipping by neighbouring properties on the vacant site. Fly tipping is causing the site to become unsightly and also has a detrimental impact on local wildlife. Policy 28: Protecting Open Space and Non Designated Open Space states that the Council will protect open spaces which provide important opportunities for formal and informal recreation as well as those which provide a social, cultural and ecological role. The policy also sets out a series of principles whereby development on open spaces will only be acceptable. The issue in relation to this site is that it has not been used for open space in 12 years therefore these criteria are not appropriate for assessing the site. Policy 28 goes onto state that "Proposals involving the loss of open space policy areas, recreational buildings and non designated open space, such as playing fields, will only be supported: 1. in accordance with national policy, and 2. where community support can be demonstrated through public consultation." It is considered that in relation to the site, the intentions of policies 27 and 28 are ineffective due to the fact that the site has been closed to the public for 12 years and there is no prospect of it reopening as a playground or area open space. No public opposition to the playground closing has been received by the Parish Council. Lack of consistency with National Policy: With regards National Policy, paragraph 97 of the NPPF states that "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly
outweigh the loss of the current or former use.

In this instance it has been clearly demonstrated that the site has remained closed and inaccessible to the public for 12 years since 2007. The information presented within this representation clearly shows that the open space, is surplus to requirements and has been for a significant amount of time. It is therefore considered that criteria a) of paragraph 97 of the NPPF has been satisfied. This in turn means that the continued allocation of this site within the submission draft Local Plan is not consistent with National planning Policy. Suitability of the site for future residential development within the Plan Period It is the Parish Council's intention to apply for planning permission for the residential development of this site and work has already commenced by the appointed architect who is currently considering different options for a proposed site layout. The site lies entirely within flood zone 1, however, as explained above the site is subject to surface water flooding. Residential development of the site would enable suitable drainage measures to be implemented to resolve this issue. The site is not within a conservation area, there are no listed buildings on site or scheduled monuments and there are no other known constraints which would prevent residential development from coming forward. Draft Policy SP2 sets out the settlement hierarchy for the district. Kirk Sandall is identified as being within the Main Urban Area of Doncaster. Draft Policy SP2 states that "Doncaster Main Urban Area provides services for the whole Borough and beyond. To strengthen this and to meet its growth objectives and regeneration needs, Doncaster Main Urban Area will be the main focus for development in the Borough, including housing." Located within the Main Urban Area, the site has excellent access to services and amenities within Kirk Sandall and Doncaster centre. The site has good access to public transport and is located approximately 0.5 miles from Kirk Sandall train station. There are bus stops located in close proximity to the site on Brecks Lane (approximately 53 meters from the site.) A local Co-op supermarket is also located within walking distance on Brecks Lane. Kirk Sandall junior school is approximately 11 minutes' walk from the site and a public playground and area of green open space is located approximately 10 minutes' walk away on Dentons Green Lane. Development of this site for housing would enable resolution of the existing drainage issues and presents an opportunity for infill development in a highly sustainable location. It would also resolve the current fly tipping issue on site and improve residential amenity for the neighbouring residents. Conclusions/Summary Despite not being used as a playground since September 2007 the site remains allocated as open space in the submission draft Local Plan. There is no justification provided by the Council within the submission draft Local Plan or the evidence base to explain why the site has been retained as an allocation for open space when it has not functioned as such for 12 years. Open space Policies 27 and 28 do not function as intended in relation to this specific site due to the fact it has not been in use since well before the start of the plan period. This site has not contributed to informal recreation in the district for a long time and reopening the park will not be possible due to the existing safety hazard and work required to address the surface water drainage issue. The site does not provide any social or cultural benefits to the community. Furthermore, it is considered that the continued allocation of this site for open space is not in accordance with National policy. Criteria a) of paragraph 97 of the NPPF has been satisfied. The site has not been used as open space for 12 years for health and safety reasons which clearly demonstrates the site is surplus to requirements. This is reinforced by the fact that the parish Council received no objections or negative feedback in response to the closure of the site in 2007. As the site has not been used as open space in 12 years, it is therefore considered unsound and wholly inappropriate for this site to be allocated as open space in the new Local Plan. As explained above, the site is in a sustainable location and presents an opportunity for small scale residential development. It is the Parish Council's intention to progress a planning application as soon as possible. We therefore request that open space allocation is removed and is either allocated for residential development or alternatively becomes 'white land' with no allocation. PROPOSED CHANGE Following on from the answer to question 6 above, we consider that the site off Sutton Road should be allocated as a small-scale housing site. The site is within the main urban area, in a residential neighbourhood with excellent access to services and amenities. The site represents a sustainable location for the delivery of housing.

Development of the site for housing would enable the existing drainage issue and fly tipping issue to be addressed which would improve residential amenity for the neighbouring properties. As explained under question 6 the site has not been used as open space since September 2007 and therefore it should not be allocated as open space in the new Local Plan. In this respect the submission draft Local Plan is unsound. If the Council is unwilling to allocate the site for housing at this stage, in order to make the plan sound, the open space allocation should be removed and the site should become white land to allow the Parish Council to submit a future planning application.

Summary:

Site at Sutton Road Barnby Dun - currently proposed for continued allocation as Open space. Objects to site be classified as Open space. Want site to be removed as an 'open space' allocation and re-allocated for residential use or alternatively 'white land'. Reasons: Not used as open space since 2007 when the playground/park was closed by the Parish Council. Site chained shut since. There is no prospect of the site re-opening as a playground or open space. There are no local objections to the site being closed. Site was closed because: 1. Flood risk - surface water flooding. Too costly to repair after each flooding. 2. PC has been unable to secure funding to permanently remediate the problem. 3. Anti-social behaviour. 4. Site is currently has a fly-tipping issue. Local Plan 1. Polices 27 & 28 are ineffective. There is no justification for the retention of the site. 2. LP is not consistent with the NPPF (para 97) 3. Site can be classified as 'surplus to requirements'. Residential use: 1. Site is suitable for residential use. 2. Residential use would generate money to remediate the flooding problem on the site.

Response:

Although this request has come forward late in the process, it is not felt that allocating this site for a purpose other than open space is justified in the Local Plan. There is a lack of evidence as to why the loss of the open space is justified or surplus to requirements, the Main Urban Area can provide ample land for housing, and the Kirk Sandall community profile area is deficient in open space suitable for children's play. That said, this could be pursued through the planning process should the applicants wish to continue promoting this site for an alternate use, and existing and emerging policy provides the means by which open space loss can be justified, should the relevant justification be provided.
Policy 29 is not considered to be sound as it is not justified or consistent with national policy for the following reasons: This policy looks for residential developments to provide open space to address local green space needs and deficiencies. Overall, the HBF is supportive of the drive towards incorporating additional green space within new communities. 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.

Summary:
Policy 29 is not considered to be sound as it is not justified or consistent with national policy. Overall, the HBF is supportive of the drive towards incorporating additional green space within new communities. 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.

Response:
Comment noted. The provision of a 10 to 15% commuted sum is reasonably related in scale and in kind to the development and is derived through consideration of spatially specific local open space provision. The green space audit (and subsequent updates) identifies open space provision by community. The figures of 10 and 15% are adapted from the Fields in Trust guidelines for open space requirements (see Fields in Trust 2.4Ha standard). NPPF paragraphs 8b and c identifies the social and environmental objectives of the NPPF. Including the need to provide open spaces that reflect current and future needs and support communities' health, social and cultural well-being. Paragraph 92a says we must plan positively for the provision of open space? and other local services to enhance the sustainability of communities and residential environments. Paragraph 96 states 'Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. The policy is required to make developments acceptable in planning terms as noted above. The green space audit (and subsequent updates) ensure that obligations are directly related to the development and reasonably related in scale and kind, therefore meeting with paragraph 56 of the NPPF. Green space provision also contributes to green infrastructure requirements in line with NPPF paragraph 20 (d) identifies strategic policies should make sufficient provision for green infrastructure. Paragraph 91 (c) identifies the role of green infrastructure in the achieving healthy and inclusive safe places.
Strata Homes welcome the revision to the requirement in Part A of the policy which previously required 56sqm of open space per family dwelling. The requirement has been slightly reduced and now seeks between 10 and 15% of the site to be open space on schemes over 20 dwellings. The explanatory text indicates that 15% is required where there is an existing deficiency in open space. Strata Homes still consider that coupled with national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. Part B of the policy requires that where sites are adjacent or close to a large open spaces as an alternative to on site open space, a commuted sum of 10 - 15% of the residential land value of the site should be provided. This is excessive, the commuted sum should be derived through consideration of specific local deficiencies in open space provision. The level of commuted sum could undermine the deliverability of the Plan and is not consistent with the principles of the Framework (paragraph 34). Nor is it consistent with the tests for planning obligations (paragraph 56 of the Framework), which seek to ensure that planning obligations are necessary to make the development acceptable, directly related to the development and fairly and reasonably related in scale and kind to the development. 10.5. Policy 29 states that greenspace is required on site and that schemes will only be supported where the required open space is provided. However, this is inconsistent with Policy 66 and 67 which states that contributions will be sought and that viability assessments will be considered on a site specific approach stating that “the Council will take a pragmatic and flexible approach to planning obligations”. 10.6. Flexibility therefore needs to be incorporated into Policy 29, in particular part A and B which reflects Policy 66 and 67. The Local Plan at present is internally inconsistent and could undermine the delivery of housing. 10.7. The Plan is its present form is not justified and is not consistent with national policy. It is considered that the Plan could fail to deliver sustainable development in accordance with the policies in the Framework. 10.8. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 10.9. However, we consider that with increased flexibility in line with policy 66 and 67 the Local Plan can be found sound. Strata Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 10.10. To overcome the objection and address soundness matters, the Council should: - Amend Policy 29 Parts A and B, and the associated explanatory text, specifically paragraphs 10.22 and 10.25, to include flexibility and encourage rather than require; and - Reduce the level of commuted sum required so that it is consistent with the requirements of the Framework.

Summary:
Strata Homes welcome the revision to the requirement in Part A of the policy which previously required 56sqm of open space per family dwelling. The requirement has been slightly reduced and now seeks between 10 and 15% of the site to be open space on schemes over 20 dwellings. The explanatory text indicates that 15% is required where there is an existing deficiency in open space. Strata Homes still consider that coupled with national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. Part B of the policy requires that where sites are adjacent or close to a large open spaces as an alternative to on site open space, a commuted sum of 10 - 15% of the residential land value of the site should be provided. This is excessive, the commuted sum should be derived through consideration of specific local deficiencies in open space provision. The level of commuted sum could undermine the deliverability of the Plan and is not consistent with the principles of the Framework (paragraph 34). Nor is it consistent with the tests for planning obligations (paragraph 56 of the Framework), which seek to ensure that planning obligations are necessary to make the development acceptable, directly related to the development and fairly and reasonably related in scale and kind to the development. Policy 29 states that greenspace is required on site and that schemes will only be supported where the required open space is provided. However, this is inconsistent with Policy 66 and 67 which states that contributions will be sought and that viability assessments will be considered on a site specific approach stating that “the Council will take a pragmatic and flexible approach to planning obligations”. Flexibility therefore needs to be incorporated into Policy 29, in particular part A and B which reflects Policy 66 and 67. The Local Plan at present is internally inconsistent and could undermine the delivery of housing.
The Local Plan should be read as a whole. Policy 29 is specific to open space and complements policy 66. The provision of a 10 to 15% commuted sum is reasonably related in scale and in kind to the development and is derived through consideration of spatially specific local open space provision. The green space audit (and subsequent updates) identifies open space provision by community. The figures of 10 and 15% are adapted from the Fields in Trust guidelines for open space requirements (see Fields in Trust 2.4Ha standard). NPPF paragraphs 8b and c identifies the social and environmental objectives of the NPPF. Including the need to provide open spaces that reflect current and future needs and support communities' health, social and cultural well-being. Paragraph 92a says we must plan positively for the provision of open space and other local services to enhance the sustainability of communities and residential environments. Paragraph 96 states ‘Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. The policy is required to make developments acceptable in planning terms as noted above. The green space audit (and subsequent updates) ensure that obligations are directly related to the development and reasonably related in scale and kind, therefore meeting with paragraph 56 of the NPPF.

In terms of Local Plan policy 67 (development viability), we should not be predetermining viability issues at the outset of an application and pass these on to other policies in the Local Plan given that the NPPF policy (as quoted above) requires authorities to consider a very wide variety of developer requirements and contributions to make a development acceptable in planning terms.

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Comment Ref: C/Policy 29/02989/1/012

Attend Examination: Not Stated

Reason:

Area: Chapter 10: Green Infrastructure

Policy: Policy 29: Open Space Provision in New Developments

Tests of Soundness:

Comment:

Policy 29 seeks to address local green space needs and deficiencies. In general, Gladman are supportive of the Council's aspiration to incorporate high quality green spaces within new communities. We are however concerned that the Policy, as currently drafted, expects that developers should address and 'make-up' for existing deficiencies in the provision of open green space. Gladman consider that it is appropriate for developers to provide only the facilities which become necessary directly as a result of the proposed development.

Summary:

Concerned expressed that Policy 29, as currently drafted, expects that developers should address and 'make-up' for existing deficiencies in the provision of open green space. Gladman consider that it is appropriate for developers to provide only the facilities which become necessary directly as a result of the proposed development.

Response:

The provision of a 10 to 15% commuted sum is reasonably related in scale and in kind to the development and is derived through consideration of spatially specific local open space provision. The green space audit (and subsequent updates) identifies open space provision by community. The figures of 10 and 15% are adapted from the Fields in Trust guidelines for open space requirements (see Fields in Trust 2.4Ha standard). NPPF paragraphs 8b and c identifies the social and environmental objectives of the NPPF. Including the need to provide open spaces that reflect current and future needs and support communities' health, social and cultural well-being. Paragraph 92a says we must plan positively for the provision of open space and other local services to enhance the sustainability of communities and residential environments. Paragraph 96 states 'Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. The policy is required to make developments acceptable in planning terms as noted above. The green space audit (and subsequent updates) ensure that obligations are directly related to the development and reasonably related in scale and kind, therefore meeting with paragraph 56 of the NPPF.
3.30 Policy 29 states the following with regard to open space provision: To address local green (open) space needs and deficiencies, development proposals: a) of 20 family dwellings or more will be supported which contribute 10% or 15% of the site as on-site open space to benefit the development itself - the nature and type of which will be determined by having regard to the Council's Green Space Audit and Playing Pitch Strategy. b) of 20 family dwellings or more, adjacent or close to a large open space (such as a public park or recreation area) alternatively may be asked to provide a commuted sum of 10% or 15% of the residential land value of the development site. c) of between 10 and 20 family dwellings will be supported which provide for a commuted sum of 10% or 15% of the residential land value of the development site to improve existing open spaces within the vicinity of the development. d) for retirement living schemes and / or aftercare facilities will be required to provide good quality on-site amenity spaces equating to 16sqm of open space per person. e) providing on-site open space will be required to provide for sustainable open space management and maintenance to be determined in discussion with the planning authority. 3.31 It is of note that Policy 29 reiterates extant UDP Policy RL4, which requires 10 - 15% on-site provision or a commuted sum in lieu of provision on-site dependent on-site specific circumstances (the number of dwellings proposed for example). The draft policy does not appear to be based on, or justified by, an up to date evidence base. 3.32 It is of note that the Council's Green Space Audit, which is referenced in Policy 29 and comprises part of the evidence base for the publication version of the Plan, is dated July 2013. This evidence is considered to be out of date. 3.33 It is also of note that the word "close" [to a large open space ?] in part 29(b) of the policy is not defined within the policy to enable those reading the policy to understand when the clause might be triggered. 3.34 It is also proposed to calculate the commuted sums based on residential land value, a figure which is unlikely to be agreed at the planning stage and will create an unacceptable circularity issue to the policy. In light of these points, we object to the current wording of Policy 29. 3.35 The general objective of Policy 29 is understood. However, the policy should be clear so that future developers understand what the open space requirements are. Recommendations 3.36 The Council's Green Space Audit should be updated and then periodically reviewed so that the information being relied upon is kept up to date. The threshold requirements should be set with reference to this evidence. 3.37 The word "close" [to a large open space ?] should be specifically defined within the policy itself or within a glossary to provide clarity for future applications. 3.38 All reference to calculating off-site contributions based on "residential land value" should be deleted from Policy 29. 3.39 The Council should base their commuted sum value for off-site open space provision on a justified calculation, which is secured through a CIL and / or S106 agreement (as appropriate) so that future developers understand what the costs will be. Justification 3.40 Policy 29 is inadequately clear, with references to an evidence base document that is out of date. It also seeks to calculate a commuted sum based on information that will not be agreed / disclosed at the planning application stage. 3.41 Further to the above, the supporting text for Policy 29 states that: "On larger applications the amount of open space to be provided should be broken down in to a minimum of 32% on-site open space suitable for children's play with the remainder taking the form of recreational sports fields, woodlands, nature conservation areas, allotments, or green infrastructure corridors, depending on the type of identified need in the area. Alternatively very large developments could consider open space provision such as a public park with integrated children’s play.” 3.42 We object to this policy as currently worded and it is of note that the “minimum 32%” requirement for larger applications is not referenced specifically in the policy itself. Recommendation 3.43 It is considered that, only if justified, the reference to a percentage split of typologies should be included within the policy itself, with the threshold pursuant 'larger applications' also defined. Justification 3.44 The supporting text as currently worded is inadequately clear, and no justification is provided for the "minimum 32%" requirement. The policy is therefore unsound.

Summary:

Object to Policy 29. This policy reiterates extant UDP Policy RL4, and is not based on or justified by up to date evidence. The Green Space Audit (2013) is considered out of date. The word “close” to a large open space is not defined and does not enable those reading to understand when the clause will be triggered. It also proposed to calculate the commuted sum based on residential land value, which is unlikely to be agreed at planning stage and create an unacceptable circularity issue in the policy. The general objective is understood, but the policy should be clear. The Green Space Audit should be updated and periodically reviewed so the information is up to date. Threshold requirements should be set within it. The word "close" should be specifically defined. All reference to calculating off site contributions based on residential land value should be deleted. The commuted sum value for off-site open space provision on a justified calculation, which is secured through a CIL and / or S106 agreement (as appropriate) so that future developers understand what the cost. Policy 29 is inadequately clear, based on out of date evidence, and based on information which will not be agreed / disclosed at application stage. Object to reference in the subtext to 32% being on site open space for children’s play as it is not referenced specifically in the policy itself. Only if justified should reference to a % split be included, and the threshold for "larger applications' needs to be defined. This is unclear and therefore unsound.
Response:

We acknowledge the date of the Green space audit and we are currently working on a review. The timescale of which will be determined in line with the Local Plan. The open spaces shown on the policies map are part of the first stage review. In terms of using the word 'close' in policy 29.B, the 2013 green space audit shows Fields in Trust walking distances and buffers, these will be used to determine closeness of a proposed development site to an open space. These distances will not change in a reviewed greenspace audit. The calculation of commuted sums is currently based on the residential land value of the site and has been used since the adoption of the 1998 UDP. It will not therefore provide an 'unacceptable circularity issue'. Securing the commuted sums is provided through S106 agreements, once a value has been determined. Policy text 10.22? The respondent has misunderstood the use of the '32%' in the supporting text. Fields in Trust identify the need and importance of children's play space and formal sports provision. This is to clarify how the developer should parcel up the open space to meet with Fields in Trust guidelines. Where a developer is required to provide a large open space bigger than a football field, this should include a children’s play area in the first instance (approximately 1/3 of the site (roughly 32%)). The remainder of the open space can be a recreational sports field, a woodland or nature conservation area, an allotment or green infrastructure corridor, depending on the type of identified need in the area. This is to ensure the 'Fields in Trust' guidelines are taken in to account.
Policy 29 states the following with regard to open space provision: To address local green (open) space needs and deficiencies, development proposals: a) of 20 family dwellings or more will be supported which contribute 10% or 15% of the site as on-site open space to benefit the development itself - the nature and type of which will be determined by having regard to the Council’s Green Space Audit and Playing Pitch Strategy. b) of 20 family dwellings or more, adjacent or close to a large open space (such as a public park or recreation area) alternatively may be asked to provide a commuted sum of 10% or 15% of the residential land value of the development site. c) of between 10 and 20 family dwellings will be supported which provide for a commuted sum of 10% or 15% of the residential land value of the development site to improve existing open spaces within the vicinity of the development. d) for retirement living schemes and / or aftercare facilities will be required to provide good quality on-site amenity spaces equating to 16sqm of open space per person. e) providing on-site open space will be required to provide for sustainable open space management and maintenance to be determined in discussion with the planning authority. 2.40 It is of note that Policy 29 reiterates extant UDP Policy RL4, which requires 10 - 15% on-site provision or a commuted sum in lieu of provision on-site dependent on-site specific circumstances (the number of dwellings proposed for example). The draft policy does not appear to be based on, or justified by, an up to date evidence base. 2.41 It is of note that the Council’s Green Space Audit, which is referenced in Policy 29 and comprises part of the evidence base for the publication version of the Plan, is dated July 2013. This evidence is considered to be out of date. 2.42 It is also of note that the word "close" [to a large open space ?] in part 29(b) of the policy is not defined within the policy to enable those reading the policy to understand when the clause might be triggered. 2.43 It is also proposed to calculate the commuted sums based on residential land value, a figure which is unlikely to be agreed at the planning stage and will create an unacceptable circularity issue to the policy. In light of these points, we object to the current wording of Policy 29. 2.44 The general objective of Policy 29 is understood. However, the policy should be clear so that future developers understand what the open space requirements are. Recommendations 2.45 The Council’s Green Space Audit should be updated and then periodically reviewed so that the information being relied upon is kept up to date. The threshold requirements should be set with reference to this evidence. 2.46 The word "close" [to a large open space ?] should be specifically defined within the policy itself or within a glossary to provide clarity for future applications. 2.47 All reference to calculating off-site contributions based on "residential land value" should be deleted from Policy 29. 2.48 The Council should base their commuted sum value for off-site open space provision on a justified calculation, which is secured through a CIL and / or S106 agreement (as appropriate) so that future developers understand what the costs will be. Justification 2.49 Policy 29 is inadequately clear, with references to an evidence base document that is out of date. It also seeks to calculate a commuted sum based on information that will not be agreed / disclosed at the planning application stage.

Summary:
Policy 29 - summary of policy text Policy 29 reiterates extant UDP Policy RL4, which requires 10 - 15% on-site provision or a commuted sum in lieu of provision on-site dependent on-site specific circumstances (the number of dwellings proposed for example). The draft policy does not appear to be based on, or justified by, an up to date evidence base. It is considered that the Council’s Green Space Audit, which is referenced in Policy 29 as part of the evidence base is out of date. The Green Space Audit should be updated and periodically reviewed so that the information being relied upon is kept up to date. The threshold requirements should be set with reference to this evidence. The word "close" [to a large open space ?] in part 29(b) of the policy is not defined to enable those reading the policy to understand when the clause might be triggered. ‘Close’ should be defined with the policy or within the glossary. It is proposed to calculate the commuted sums based on residential land value, a figure which is unlikely to be agreed at the planning stage and will create an unacceptable circularity issue to the policy. All reference to calculating off-site contributions based on “residential land value” should be deleted from Policy 29. The commuted sum value for off-site open space provision should be based on a justified calculation, which is secured through a CIL and / or S106 agreement (as appropriate) so that future developers understand what the costs will be. The general objective of Policy 29 is understood but we object to the current wording of Policy 29. It should be clear so that future developers understand what the open space requirements are.

Response:
We acknowledge the date of the Green space audit and we are currently working on a review. The timescale of which will be determined in line with the Local Plan. The open spaces shown on the policies map are part of the first stage review. In terms of using the word ‘close’ in policy 29.8, the 2013 green space audit shows Fields in Trust walking distances and buffers, these will be used to determine closeness of a proposed development site to an open space. These distances will not change in a reviewed greenspace audit. The calculation of commuted sums is currently based on the residential land value of the site and has been used since the adoption of the 1998 UDP. It will not therefore provide an ‘unacceptable circularity issue’. Securing the commuted sums is provided through S106 agreements, once a land value has been determined.
We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Tests of Soundness:

Policy 29: Open Space Provision in New Developments states that development proposals for 20 family dwellings or more will be supported where they provide between 10-15% of the site area to be provided as on-site open space and where such development is adjacent or close to a large open space may be asked to provide a commuted sum of 10% or 15% of the residential land value of the development site. Persimmon Homes agrees that public open space is required to form sustainable communities. However, there needs to be a clear and transparent method, provided by the Council, for calculating the percentage of public open space required on site. The Council’s proposals for a commuted sum as an alternative to on-site open space, which suggests a sum of 10-15% of the residential land value, is overly excessive and will threaten the deliverability of sites. Any commuted sum should be reasonably related in scale and in kind to the development and should be derived through consideration of specific deficiencies in local open space provision. This policy is not consistent with the NPPF or the legal tests for planning obligations, which are set out in the CIL Regulations and at paragraph 56 of the Framework. To address our objection, the policy should be revised to provide a clear and transparent method for calculating the quantum of on-site open space required, and the commuted sum payable for off-site provision should be reduced to ensure that it is consistent with national policy.

Response:

Comment noted, we also acknowledge that open space is required for sustainable communities. The provision of a 10 to 15% commuted sum is reasonably related in scale and in kind to the development and is derived through consideration of spatially specific local open space provision. The green space audit (and subsequent updates) identifies open space provision by community. The figures of 10 and 15% are adapted from the Fields in Trust guidelines for open space requirements (see Fields in Trust 2.4Ha standard). NPPF paragraphs 8b and c identifies the social and environmental objectives of the NPPF. Including the need to provide open spaces that reflect current and future needs and support communities' health, social and cultural well-being. Paragraph 92a says we must plan positively for the provision of open space and other local services to enhance the sustainability of communities and residential environments. Paragraph 96 states Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. The policy is required to make developments acceptable in planning terms as noted above. The green space audit (and subsequent updates) ensure that obligations are directly related to the development and reasonably related in scale and kind. Therefore meeting with paragraph 56 of the NPPF. Green space provision also contributes to green infrastructure requirements in line with NPPF paragraph 20 (d) identifies strategic policies should make sufficient provision for green infrastructure. Paragraph 91 (c) identifies the role of green infrastructure in the achieving healthy and inclusive safe places.
2.71 Policy 29 states the following with regard to open space provision: "To address local green (open) space needs and deficiencies, development proposals: a) of 20 family dwellings or more will be supported which contribute 10% or 15% of the site as on-site open space to benefit the development itself - the nature and type of which will be determined by having regard to the Council’s Green Space Audit and Playing Pitch Strategy. b) of 20 family dwellings or more, adjacent or close to a large open space (such as a public park or recreation area) alternatively may be asked to provide a commuted sum of 10% or 15% of the residential land value of the development site. c) of between 10 and 20 family dwellings will be supported which provide for a commuted sum of 10% or 15% of the residential land value of the development site to improve existing open spaces within the vicinity of the development. d) for retirement living schemes and / or aftercare facilities will be required to provide good quality on-site amenity spaces equating to 16sqm of open space per person. e) providing on-site open space will be required to provide for sustainable open space management and maintenance to be determined in discussion with the planning authority." 2.72 Policy 29 reiterates extant UDP Policy RL4, which requires 10 - 15% on-site provision or a commuted sum in lieu of provision on-site dependent on-site specific circumstances (the number of dwellings proposed for example). The draft Policy does not appear to be based on, or justified by, an up to date evidence base. 2.73 The Council's Green Space Audit, which is referenced in Policy 29 and comprises part of the evidence base for the publication version of the Plan, is dated July 2013. This evidence is considered to be out of date. 2.74 It is also of note that the word "close" [to a large open space ?] in part 29(b) of the policy is not defined within the policy, to enable those reading the policy to understand when the clause might be triggered. 2.75 The policy proposes the calculation of a commuted sum, in lieu of on-site POS provision, based on residential land value. This figure would not ordinarily be agreed or disclosed at the planning stage and will create an unacceptable circularity issue to the policy. In light of these points, we object to the current wording of Policy 29. 2.76 The general objective of Policy 29 is understood. However, the policy should be clear so that future developers understand what the open space requirements are. Recommendations 2.77 The Council’s Green Space Audit should be updated and then periodically reviewed so that the information being relied upon is kept up to date. The threshold requirements should be set with reference to this evidence. 2.78 The word "close" [to a large open space ?] should be specifically defined within the policy itself or within a glossary to provide clarity for future applications. 2.79 All reference to calculating off-site contributions based on "residential land value" should be deleted from Policy 29. 2.80 The Council should base their commuted sum value for off-site open space provision on a justified calculation, which is secured through a CIL and / or S106 agreement (as appropriate) so that future developers understand what the costs will be. Justification 2.81 Policy 29 is inadequately clear, with references to an evidence base document that is out of date. It also seeks to calculate a commuted sum based on information that will not be agreed / disclosed at the planning application stage.

Summary:
Policy 29. The Council's Green Space Audit should be updated and then periodically reviewed so that the information being relied upon is kept up to date. The threshold requirements should be set with reference to this evidence. The word "close" [to a large open space ?] should be specifically defined within the policy itself or within a glossary to provide clarity for future applications. All reference to calculating off-site contributions based on "residential land value" should be deleted from Policy 29. The Council should base their commuted sum value for off-site open space provision on a justified calculation, which is secured through a CIL and / or S106 agreement (as appropriate) so that future developers understand what the costs will be. Policy 29 is inadequately clear, with references to an evidence base document that is out of date. It also seeks to calculate a commuted sum based on information that will not be agreed / disclosed at the planning application stage.

Response:
We acknowledge the date of the Green space audit and we are currently working on a review. The timescale of which will be determined in line with the Local Plan. The open spaces shown on the policies map are part of the first stage review. In terms of using the word 'close' in policy 29.B, the 2013 green space audit shows Fields in Trust walking distances and buffers, these will be used to determine closeness of a proposed development site to an open space. These distances will not change in a reviewed greenspace audit. The calculation of commuted sums is currently based on the residential land value of the site and has been used since the adoption of the 1998 UDP. It will not therefore provide an 'unacceptable circularity issue'. Securing the commuted sums is provided through S106 agreements, once a value has been determined.
Amend Policy 29 Parts A and B, and the associated explanatory text, specifically
To overcome the
commuted sums
Attend Hearing
Open space Provision. 1. Level of Green space requirement could impact on deliverability. 2. Part B
Chapter 10: Green Infrastructure
Consistency with National Policy  Justification  10.3. H. Burtwistle & Son welcome the revision to the requirement in Part A of the policy which previously required $56$ per dwelling. The requirement has been slightly reduced and now seeks between 10 and 15% of the site to be open space on schemes over 20 dwellings. The explanatory text indicates that 15% is required where there is an existing deficiency in open space. H. Burtwistle & Son still consider that coupled with national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. 10.4. Part B of the policy requires that where sites are adjacent or close to a large open spaces as an alternative to on site open space, a commuted sum of 10 - 15% of the residential land value of the site should be provided. This is excessive, the commuted sum should be derived through consideration of specific local deficiencies in open space provision. The level of commuted sum could undermine the deliverability of the Plan and is not consistent with the principles of the Framework (paragraph 34). Nor is it consistent with the tests for planning obligations ( paragraph 56 of the Framework), which seek to ensure that planning obligations are necessary to make the development acceptable, directly related to the development and fairly and reasonably related in scale and kind to the development. 10.5. Policy 29 states that greenspace is required on site and that schemes will only be supported where the required open space is provided. However, this is inconsistent with Policy 66 and 67 which states that contributions will be sought and that viability assessments will be considered on a site specific approach stating that "the Council will take a pragmatic and flexible approach to planning obligations". 10.6. Flexibility therefore needs to be incorporated into Policy 29, in particular part A and B which reflects Policy 66 and 67. The Local Plan at present is internally inconsistent and could undermine the delivery of housing. 10.7. The Plan is its present form is not justified and is not consistent with national policy. It is considered that the Plan could fail to deliver sustainable development in accordance with the policies in the Framework. 10.8. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 10.9. However, we consider that with increased flexibility in line with policy 66 and 67 the Local Plan can be found sound. H. Burtwistle
& Son will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 10.10. To overcome the objection and address soundness matters, the Council should: - Amend Policy 29 Parts A and B, and the associated explanatory text, specifically paragraphs 10.22 and 10.25, to include flexibility and encourage rather than require; and - Reduce the level of commuted sum required so that it is consistent with the requirements of the Framework.

10.1. H. Burtwistle & Son is concerned that the level of new greenspace sought on sites will hinder the ability to deliver new housing efficiently and effectively, therefore consider that the Policy 29 is unsound. Test of Soundness 10.2. H. Burtwistle & Son considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy  Justification 10.3. H. Burtwistle & Son welcome the revision to the requirement in Part A of the policy which previously required $56$ per family dwelling. The requirement has been slightly reduced and now seeks between 10 and 15% of the site to be open space on schemes over 20 dwellings. The explanatory text indicates that 15% is required where there is an existing deficiency in open space. H. Burtwistle & Son still consider that coupled with national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. 10.4. Part B of the policy requires that where sites are adjacent or close to a large open spaces as an alternative to on site open space, a commuted sum of 10 - 15% of the residential land value of the site should be provided. This is excessive, the commuted sum should be derived through consideration of specific local deficiencies in open space provision. The level of commuted sum could undermine the deliverability of the Plan and is not consistent with the principles of the Framework (paragraph 34). Nor is it consistent with the tests for planning obligations ( paragraph 56 of the Framework), which seek to ensure that planning obligations are necessary to make the development acceptable, directly related to the development and fairly and reasonably related in scale and kind to the development. 10.5. Policy 29 states that greenspace is required on site and that schemes will only be supported where the required open space is provided. However, this is inconsistent with Policy 66 and 67 which states that contributions will be sought and that viability assessments will be considered on a site specific approach stating that "the Council will take a pragmatic and flexible approach to planning obligations". 10.6. Flexibility therefore needs to be incorporated into Policy 29, in particular part A and B which reflects Policy 66 and 67. The Local Plan at present is internally inconsistent and could undermine the delivery of housing. 10.7. The Plan is its present form is not justified and is not consistent with national policy. It is considered that the Plan could fail to deliver sustainable development in accordance with the policies in the Framework. 10.8. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 10.9. However, we consider that with increased flexibility in line with policy 66 and 67 the Local Plan can be found sound. H. Burtwistle
& Son will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 10.10. To overcome the objection and address soundness matters, the Council should: - Amend Policy 29 Parts A and B, and the associated explanatory text, specifically paragraphs 10.22 and 10.25, to include flexibility and encourage rather than require; and - Reduce the level of commuted sum required so that it is consistent with the requirements of the Framework.

Summary:
Policy 29 - Open space Provision. 1. Level of Green space requirement could impact on deliverability. 2. Part B - commuted sums -this is excessive, could undermine deliverability. 3. Policy not consistent with Policies 66 & 67 re open space requirements. 4. Flexibility need to accord with policies 66 & 67. 5. Amend Parts A & B (and para 10.22 & 10.25) to 'encourage' rather than 'require'.

Response:
Comment noted. The Local Plan should be read as a whole. Policy 29 is specific to open space and complements policy 66. The provision of a 10 to 15% commuted sum is reasonably related in scale and in kind to the development and is derived through consideration of spatially specific local open space provision. The green space audit (and subsequent updates) identifies open space provision by community. The figures of 10 and 15% are adopted from the Fields in Trust guidelines for open space requirements (see Fields in Trust 2.4Ha standard). NPPF paragraphs 8b and c identifies the social and environmental objectives of the NPPF. Including the need to provide open spaces that reflect current and future needs and support communities’ health, social and cultural well-being. Paragraph 92a says we must plan positively for the provision of open space and other local services to enhance the sustainability of communities and residential environments. Paragraph 96 states ‘Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. The policy is required to make developments acceptable in planning terms as noted above. The green space audit (and subsequent updates) ensure that obligations are directly related to the development and reasonably related in scale and kind, therefore meeting with paragraph 56 of the NPPF. In terms of Local Plan policy 67 (development viability), we should not be predetermining viability issues at the outset of an application and pass these on to other policies in the Local Plan. Given that the NPPF policy (as quoted above) requires authorities to consider a very wide variety of developer requirements and contributions to make a development acceptable in planning terms.
10.1. H. Burtwistle & Son is concerned that the level of new greenspace sought on sites will hinder the ability to deliver new housing efficiently and effectively, therefore consider that the Policy 29 is unsound. Test of Soundness 10.2. H. Burtwistle & Son considers that the Doncaster Local Plan - Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Pragmatic and Flexible X - Consistent with National Policy X - Justification

10.3. H. Burtwistle & Son welcome the revision to the requirement in Part A of the policy which previously required 56sqm of open space per family dwelling. The requirement has been slightly reduced and now seeks between 10 and 15% of the site to be open space on schemes over 20 dwellings. The explanatory text indicates that 15% is required where there is an existing deficiency in open space. H. Burtwistle & Son still consider that coupled with national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. 10.4. Part B of the policy requires that where sites are adjacent or close to a large open spaces as an alternative to on site open space, a commuted sum of 10 - 15% of the residential land value of the site should be provided. This is excessive, the commuted sum should be derived through consideration of specific local deficiencies in open space provision. The level of commuted sum could undermine the deliverability of the Plan and is not consistent with the principles of the Framework (paragraph 34). Nor is it consistent with the tests for planning obligations (paragraph 56 of the Framework), which seek to ensure that planning obligations are necessary to make the development acceptable, directly related to the development and fairly and reasonably related in scale and kind to the development. 10.5. Policy 29 states that greenspace is required on site and that schemes will only be supported where the required open space is provided. However, this is inconsistent with Policy 66 and 67 which states that contributions will be sought and that viability assessments will be considered on a site specific approach stating that "the Council will take a pragmatic and flexible approach to planning obligations". 10.6. Flexibility therefore needs to be incorporated into Policy 29, in particular part A and B which reflects Policy 66 and 67. The Local Plan at present is internally inconsistent and could undermine the delivery of housing. 10.7. The Plan is its current form is not justified and is not consistent with national policy. It is considered that the Plan could fail to deliver sustainable development in accordance with the policies in the Framework. 10.8. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 10.9. However, we consider that with increased flexibility in line with policy 66 and 67 the Local Plan can be found sound. H. Burtwistle & Son will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 10.10. To overcome the objection and address soundness matters, the Council should: - Amend Policy 29 Parts A and B, and the associated explanatory text, specifically paragraphs 10.22 and 10.25, to include flexibility and encourage rather than require; and - Reduce the level of commuted sum required so that it is consistent with the requirements of the Framework.

Summary:

Welcome the revision to the requirement in Part A of the policy which previously required 56sqm of open space per family dwelling. The requirement has been slightly reduced and now seeks between 10 and 15% of the site to be open space on schemes over 20 dwellings. The explanatory text indicates that 15% is required where there is an existing deficiency in open space. Still consider that coupled with national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. Part B of the policy requires that where sites are adjacent or close to a large open spaces as an alternative to on site open space, a commuted sum of 10 - 15% of the residential land value of the site should be provided. This is excessive, the commuted sum could undermine the deliverability of the Plan and is not consistent with the principles of the Framework (paragraph 34). Nor is it consistent with the tests for planning obligations (paragraph 56 of the Framework), which seek to ensure that planning obligations are necessary to make the development acceptable, directly related to the development and fairly and reasonably related in scale and kind to the development. Policy 29 states that greenspace is required on site and that schemes will only be supported where the required open space is provided. However, this is inconsistent with Policy 66 and 67 which states that contributions will be sought and that viability assessments will be considered on a site specific approach stating that "the Council will take a pragmatic and flexible approach to planning obligations". Flexibility therefore needs to be incorporated into Policy 29, in particular part A and B which reflects Policy 66 and 67. The Local Plan at present is internally inconsistent and could undermine the delivery of housing.
Response:
The provision of a 10 to 15% commuted sum is reasonably related in scale and in kind to the development and is derived through consideration of spatially specific local open space provision. The green space audit (and subsequent updates) identifies open space provision by community. The figures of 10 and 15% are adapted from the Fields in Trust guidelines for open space requirements (see Fields in Trust 2.4Ha standard). NPPF paragraphs 8b and c identifies the social and environmental objectives of the NPPF. Including the need to provide open spaces that reflect current and future needs and support communities' health, social and cultural well-being. Paragraph 92a says we must plan positively for the provision of open space and other local services to enhance the sustainability of communities and residential environments. Paragraph 96 states 'Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. The policy is required to make developments acceptable in planning terms as noted above. The green space audit (and subsequent updates) ensure that obligations are directly related to the development and reasonably related in scale and kind, therefore meeting with paragraph 56 of the NPPF. In terms of Local Plan policy 67 (development viability), we should not be predetermining viability issues at the outset of an application and pass these on to other policies in the Local Plan given that the NPPF policy (as quoted above) requires authorities to consider a very wide variety of developer requirements and contributions to make a development acceptable in planning terms.

Test of Soundness:

Previous comments remain relevant. Justification is required for 20+ family dwellings threshold and the threshold for commuted sum. Concerns remain about addressing open space deficiencies - developers should not be expected to deliver open space to make good existing open space deficiencies, but should provide a quantum of open space sufficient to meet the need generated by the proposed development. To do otherwise would fail the planning obligation test set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 'fairly and reasonably related in scale and kind to the development.' Further detail is required on the extent of development contributions, where they are required.

Summary:

Response:
The provision of a 10 to 15% commuted sum is reasonably related in scale and in kind to the development and is derived through consideration of spatially specific local open space provision. The green space audit (and subsequent updates) identifies open space provision by community. The figures of 10 and 15% are adapted from the Fields in Trust guidelines for open space requirements (see Fields in Trust 2.4Ha standard). NPPF paragraphs 8b and c identifies the social and environmental objectives of the NPPF. Including the need to provide open spaces that reflect current and future needs and support communities' health, social and cultural well-being. Paragraph 92a says we must plan positively for the provision of open space and other local services to enhance the sustainability of communities and residential environments. Paragraph 96 states 'Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. The policy is required to make developments acceptable in planning terms as noted above. The green space audit (and subsequent updates) ensure that obligations are directly related to the development and reasonably related in scale and kind, therefore meeting with paragraph 56 of the NPPF. 

C/Policy 29/04444/1/015

Name: Johnson Mowat

Date: 30/09/2019

Organisation: Johnson Mowat

Representing: The Strategic Land Group

Comment Ref: C/Policy 29/04444/1/015

Attend Examination: Attend Hearing

Reason: To allow participation in discussions regarding the settlement strategy, proposed housing requirement and distribution of development including site selection and allocations.

Area: Chapter 10: Green Infrastructure

Policy: Policy 29: Green Infrastructure

Tests of Soundness:

Comment: 2.74 Although the wording of this policy has changed slightly in relation to the requirements set as a percentage of the site rather than a quantum our previous comments remain relevant. Justification is required regarding the '20 family dwellings or more' threshold at which to provide a commuted sum of 10 - 15% of the residential land value. 2.75 Our concerns remain regarding the reference in the policy to addressing open space deficiencies. Developers should not be expected to deliver open space to make good existing open space deficiencies, but should provide a quantum of open space sufficient to meet the need generated by the proposed development. To do otherwise would fail the planning obligation test set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 'fairly and reasonably related in scale and kind to the development.' Further detail is required on the extent of development contributions, where they are required.
Comment Ref:  C/Policy 29/04706/1/008
Attend Examination:  Attend Hearing
Reason:  We wish to discuss with the Inspector and Council our concerns regarding the Open Space allocation at Warmsworth. There is detailed evidence which will need to be discussed orally.
Area:  Chapter 10: Green Infrastructure
Policy:  Policy 29: Open Space Provision in New Developments
Tests of Soundness:  Positively prepared  Effective
                          Justified  Consistent with national
Comment:
Whilst we agree that new development needs to provide open space within a proposal, we do question where the requirement to provide 56sqm of open space per family dwelling on a scheme over 20 units has derived? Development sites need to be used effectively and efficiently, and whilst we do not object to the inclusion of open space within a proposal, further detail would be welcomed on this matter; particularly when considering maintenance of such land. We therefore request justification with regard to the requirement for 56sqm of open space per family dwelling on a scheme over 20 units.
Summary:
Whilst agreeing that new development needs to provide open space within a proposal, question where the requirement to provide 56sqm of open space per family dwelling on a scheme over 20 units is derived? Development sites need to be used effectively and efficiently, and whilst we do not object to the inclusion of open space within a proposal, further detail would be welcomed on this matter; particularly when considering maintenance of such land. Request justification with regard to the requirement for 56sqm of open space per family dwelling on a scheme over 20 units.
Response:
Comment noted. Local Plan (publication version) policy 29 does not ask for 56sqm of open space per family dwelling.
We wish to discuss with the Inspector and Council our concerns regarding the Open Space allocation at Warmsworth. There is detailed evidence which will need to be discussed orally.

**Area:** Chapter 10: Green Infrastructure

**Policy:** Policy 29: Open Space Provision in New Developments

**Tests of Soundness:**
- Positively prepared
- Effective
- Justified
- Consistent with national

**Comment:**
Whilst agreeing that new development needs to provide open space within a proposal, question where the requirement to provide 56sqm of open space per family dwelling on a scheme over 20 units is derived? Development sites need to be used effectively and efficiently, and whilst we do not object to the inclusion of open space within a proposal, further detail would be welcomed on this matter; particularly when considering maintenance of such land. We therefore request justification with regard to the requirement for 56sqm of open space per family dwelling on a scheme over 20 units.

**Response:**
Comment noted. Local Plan (publication version) policy 29 does not ask for 56sqm of open space per family dwelling.
We wish to discuss with the Inspector and Council our concerns regarding the Open Space allocation at Warmsworth. There is detailed evidence which will need to be discussed orally. 

We agree that new development needs to provide open space within a proposal, we do question where the requirement to provide 56sqm of open space per family dwelling on a scheme over 20 units has derived? Development sites need to be used effectively and efficiently, and whilst we do not object to the inclusion of open space within a proposal, further detail would be welcomed on this matter; particularly when considering maintenance of such land. We therefore request justification with regard to the requirement for 56sqm of open space per family dwelling on a scheme over 20 units.

Summary:

Whilst agreeing that new development needs to provide open space within a proposal, question where the requirement to provide 56sqm of open space per family dwelling on a scheme over 20 units is derived? Development sites need to be used effectively and efficiently, and whilst we do not object to the inclusion of open space within a proposal, further detail would be welcomed on this matter; particularly when considering maintenance of such land. Request justification with regard to the requirement for 56sqm of open space per family dwelling on a scheme over 20 units.

Response:

Comment noted. Local Plan (publication version) policy 29 does not ask for 56sqm of open space per family dwelling.
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<tr>
<th>CUSREF: 04709</th>
<th>Name: Savills</th>
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<tr>
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<td>Organisation: Savills</td>
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<td>Representing: Warde-Aldam Estates</td>
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**Comment Ref:** C/Policy 29/04709/1/008  
**Attend Examination:** Attend Hearing  
**Reason:** We wish to discuss with the Inspector and Council our concerns regarding the Open Space allocation at Warmsworth. There is detailed evidence which will need to be discussed orally.  
**Area:** Chapter 10: Green Infrastructure  
**Policy:** Policy 29: Open Space Provision in New Developments  

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**Comment:**  
Whilst we agree that new development needs to provide open space within a proposal, we do question where the requirement to provide 56sqm of open space per family dwelling on a scheme over 20 units has derived? Development sites need to be used effectively and efficiently, and whilst we do not object to the inclusion of open space within a proposal, further detail would be welcomed on this matter; particularly when considering maintenance of such land. We therefore request justification with regard to the requirement for 56sqm of open space per family dwelling on a scheme over 20 units.  

**Summary:**  
Whilst agreeing that new development needs to provide open space within a proposal, question where the requirement to provide 56sqm of open space per family dwelling on a scheme over 20 units is derived? Development sites need to be used effectively and efficiently, and whilst we do not object to the inclusion of open space within a proposal, further detail would be welcomed on this matter; particularly when considering maintenance of such land. Request justification with regard to the requirement for 56sqm of open space per family dwelling on a scheme over 20 units.  

**Response:**  
Comment noted. Local Plan (publication version) policy 29 does not ask for 56sqm of open space per family dwelling.
Comment Ref: C/Policy 29/04960/1/009

Attend Examination: Attend Hearing

Reason: To allow participation in discussions regarding the proposed housing requirement and distribution of development including site selection and allocations.

Area: Chapter 10: Green Infrastructure

Policy: Policy 29: Open Space Provision in New Developments

Tests of Soundness:
- Positively prepared
- Effective
- Justified
- Consistent with national

Comment:

2.34 Although the wording of this policy has changed slightly in relation to the requirements set as a percentage of the site rather than a quantum our previous comments remain relevant. Justification is required regarding the '20 family dwellings or more' threshold at which to provide 10-15\% of the site as open space, and the 10 - 12 family dwelling threshold at which to provide a commuted sum of 10 - 15\% of the residential land value. 2.35 Our concerns remain regarding the reference in the policy to addressing open space deficiencies. Developers should not be expected to deliver open space to make good existing open space deficiencies, but should provide a quantum of open space sufficient to meet the need generated by the proposed development. To do otherwise would fail the planning obligation test set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 'fairly and reasonably related in scale and kind to the development.' Further detail is required on the extent of development contributions, where they are required.

Summary:

Previous comments remain relevant. Justification is required for 20+ family dwellings threshold and the threshold for commuted sum. Concerns remain about addressing open space deficiencies - developers should not be expected to deliver open space to make good existing deficiencies, but should provide an amount sufficient to meet need generated by the proposed development. To do otherwise would fail the planning obligations test and CIL requirements. Further detail is needed.

Response:

The provision of a 10 to 15\% commuted sum is reasonably related in scale and in kind to the development and is derived through consideration of spatially specific local open space provision. The green space audit (and subsequent updates) identifies open space provision by community. The figures of 10 and 15\% are adapted from the Fields in Trust guidelines for open space requirements (see Fields in Trust 2.4Ha standard). NPPF paragraphs 8b and c identifies the social and environmental objectives of the NPPF. Including the need to provide open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing. Paragraph 92a says we must plan positively for the provision of ? open space? and other local services to enhance the sustainability of communities and residential environments. Paragraph 96 states 'Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. The policy is required to make developments acceptable in planning terms as noted above. The green space audit (and subsequent updates) ensure that obligations are directly related to the development and reasonably related in scale and kind, therefore meeting with paragraph 56 of the NPPF.
Concerned that the level of greenspace sought will hinder the ability to deliver new housing effectively and efficiently - therefore Policy 29 is unsound. Welcome the revision to Part A which removes the 56sqm per dwelling requirement. With the new policy requirement, and coupled with other policy requirements such as space standards etc., there could be implications for housing scheme delivery and the ability to achieve the housing requirement. The requirement in part B for a commuted sum is excessive. This should be derived through consideration of specific local deficiencies in open space provision. The level of commuted sum could undermine the deliverability of the Plan and is not consistent with the principles of the Framework (paragraph 34). Nor is it consistent with the tests for planning obligations (paragraph 56 of the Framework), which seek to ensure that planning obligations are necessary to make the development acceptable, directly related to the development and fairly and reasonably related in scale and kind to the development. 10.5. Policy 29 states that greenspace is required on site and that schemes will only be supported where the required open space is provided. However, this is inconsistent with Policy 66 and 67 which states that contributions will be sought and that viability assessments will be considered on a site specific approach stating that “the Council will take a pragmatic and flexible approach to planning obligations”. 10.6. Flexibility therefore needs to be incorporated into Policy 29, in particular part A and B which reflects Policy 66 and 67. The Local Plan at present is internally inconsistent and could undermine the delivery of housing. 10.7. The Plan is its present form is not justified and is not consistent with national policy. It is considered that the Plan could fail to deliver sustainable development in accordance with the policies in the Framework. 10.8. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 10.9. However, we consider that with increased flexibility in line with policy 66 and 67 the Local Plan can be found sound. Framecourt Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 10.10. To overcome the objection and address soundness matters, the Council should: - Amend Policy 29 Parts A and B, and the associated explanatory text, specifically paragraphs 10.22 and 10.25, to include flexibility and encourage rather than require; and - Reduce the level of commuted sum required so that it is consistent with the requirements of the Framework.
In terms of Local Plan policy 67 (development viability), we should not be predetermining viability issues at the outset of an application and pass these on to other policies in the Local Plan given that the NPPF policy (as quoted above) requires authorities to consider a very wide variety of developer requirements and contributions to make a development acceptable in planning terms.
Avant Homes is concerned that the level of new greenspace sought on sites will hinder the ability to deliver new housing efficiently and effectively, therefore consider that the Policy 29 is unsound. Test of Soundness 10.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 10.3. Avant Homes welcome the revision to the requirement in Part A of the policy which previously required 56sqm of open space per family dwelling. The requirement has been slightly reduced and now seeks between 10 and 15% of the site to be open space on schemes over 20 dwellings. The explanatory text indicates that 15% is required where there is an existing deficiency in open space. Avant Homes still consider that coupled with national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. 10.4. Part B of the policy requires that where sites are adjacent or close to a large open spaces as an alternative to on site open space, a commuted sum of 10 - 15% of the residential land value of the site should be provided. This is excessive, the commuted sum should be derived through consideration of specific local deficiencies in open space provision. The level of commuted sum could undermine the deliverability of the Plan and is not consistent with the principles of the Framework (paragraph 34). Nor is it consistent with the tests for planning obligations (paragraph 56 of the Framework), which seek to ensure that planning obligations are necessary to make the development acceptable, directly related to the development and fairly and reasonably related in scale and kind to the development. 10.5. Policy 29 states that greenspace is required on site and that schemes will only be supported where the required open space is provided. However, this is inconsistent with Policy 66 and 67 which states that contributions will be sought and that viability assessments will be considered on a site specific approach stating that "the Council will take a pragmatic and flexible approach to planning obligations". 10.6. Flexibility therefore needs to be incorporated into Policy 29, in particular part A and B which reflects Policy 66 and 67. The Local Plan at present is internally inconsistent and could undermine the delivery of housing. 10.7. The Plan is its present form is not justified and is not consistent with national policy. It is considered that the Plan could fail to deliver sustainable development in accordance with the policies in the Framework. 10.8. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 10.9. However, we consider that with increased flexibility in line with policy 66 and 67 the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 10.10. To overcome the objection and address soundness matters, the Council should: - Amend Policy 29 Parts A and B, and the associated explanatory text, specifically paragraphs 10.22 and 10.25, to include flexibility and encourage rather than require; and - Reduce the level of commuted sum required so that it is consistent with the requirements of the Framework.

Summary:
Welcome the revisions to the requirement of Part A which previously required 56sqm of open space per dwelling. Consider that with other policy standard requirements, 10 - 15% could still have implications for housing schemes and delivery. The 10 - 15% commuted sum when adjacent to large open spaces (Part B) is excessive. The level of commuted sum is not consistent with para. 34 of the NPPF or tests for planning obligations (para. 56), which seek to ensure that obligations are necessary to make the development acceptable, directly related to the development and fairly and reasonably related in scale to the kind of development. Policy 29 states that schemes will only be supported when the required open space is provided, but this is inconsistent with policies 66 and 67 which state the council will take a pragmatic approach to obligations. Flexibility therefore needs to be incorporated into Policy 29, in particular part A and B which reflects Policy 66 and 67. The Local Plan at present is internally inconsistent and could undermine the delivery of housing. It is not justified and consistent with national policy and could fail to deliver sustainable development in accordance with the framework. The plan is not currently sound. Proposed change: Amend Policy 29 Parts A and B, and the associated explanatory text, specifically paragraphs 10.22 and 10.25, to include flexibility and encourage rather than require; and reduce the level of commuted sum required so that it is consistent with the requirements of the Framework.

Response:
Comment noted. The Local Plan should be read as a whole. Policy 29 is specific to open space and complements policy 66. The provision of a 10 to 15% commuted sum is reasonably related in scale and in kind to the development and is derived through consideration of spatially specific local open space provision. The green space audit (and subsequent updates) identifies open space provision by community. The figures of 10 and 15% are adapted from the Fields in Trust guidelines for open space requirements (see Fields in Trust 2.4Ha standard). NPPF paragraphs 8b and c identifies the social and environmental objectives of the NPPF. Including the need to provide open spaces that reflect current and future needs and support communities' health, social and cultural well-being. Paragraph 92a says we must plan positively for the provision of open space and other local services to enhance the sustainability of communities and residential environments. Paragraph 96 states "Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. The policy is required to make developments acceptable in planning terms as noted above. The green space audit (and subsequent updates) ensure that obligations are related to the development and reasonably related in scale and kind, therefore meeting with paragraph 56 of the NPPF. In terms of Local Plan policy 67 (development viability), we should not be predetermining viability issues at the outset of an application and pass

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10.1. Avant Homes is concerned that the level of new greenspace sought on sites will hinder the ability to deliver new housing efficiently and effectively, therefore consider that the Policy 29 is unsound. Test of Soundness 10.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistent with National Policy Justification 10.3. Avant Homes welcome the revision to the requirement in Part A of the policy which previously required 56sqm of open space per family dwelling. The requirement has been slightly reduced and now seeks between 10 and 15% of the site to be open space on schemes over 20 dwellings. The explanatory text indicates that 15% is required where there is an existing deficiency in open space. Avant Homes still consider that coupled with national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. 10.4. Part B of the policy requires that where sites are adjacent or close to a large open spaces as an alternative to on site open space, a commuted sum of 10 - 15% of the residential land value of the site should be provided. This is excessive, the commuted sum should be derived through consideration of specific local deficiencies in open space provision. The level of commuted sum could undermine the deliverability of the Plan and is not consistent with the principles of the Framework (paragraph 34). Nor is it consistent with the tests for planning obligations (paragraph 56 of the Framework), which seek to ensure that planning obligations are necessary to make the development acceptable, directly related to the development and fairly and reasonably related in scale and kind to the development. 10.5. Policy 29 states that greenspace is required on site and that schemes will only be supported where the required open space is provided. However, this is inconsistent with Policy 66 and 67 which states that contributions will be sought and that viability assessments will be considered on a site specific approach stating that “the Council will take pragmatic and flexible approach to planning obligations”. 10.6. Flexibility therefore needs to be incorporated into Policy 29, in particular part A and B which reflects Policy 66 and 67. The Local Plan at present is internally inconsistent and could undermine the delivery of housing. 10.7. The Plan is its present form is not justified and is not consistent with national policy. It is considered that the Plan could fail to deliver sustainable development in accordance with the policies in the Framework. 10.8. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 10.9. However, we consider that with increased flexibility in line with policy 66 and 67 the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 10.10. To overcome the objection and address soundness matters, the Council should: - Amend Policy 29 Parts A and B, and the associated explanatory text, specifically paragraphs 10.22 and 10.25, to include flexibility and encourage rather than require; and - Reduce the level of commuted sum required so that it is consistent with the requirements of the Framework.

Summary:

Welcome the revisions to the requirement of Part A which previously required 56sqm of open space per dwelling. Consider that with other policy standard requirements, 10 - 15% could still have implications for housing schemes and delivery. The 10 - 15% commuted sum when adjacent to large open spaces (Part B) is excessive. The level of commuted sum is not consistent with para. 34 of the NPPF or tests for planning obligations (para. 56), which seek to ensure that obligations are necessary to make the development acceptable, directly related to the development and fairly and reasonably related in scale to the kind of development. Policy 29 states that schemes will only be supported when the required open space is provided, but this is inconsistent with policies 66 and 67 which state the council will take a pragmatic approach to obligations. Flexibility therefore needs to be incorporated into Policy 29, in particular part A and B which reflects Policy 66 and 67. The Local Plan at present is internally inconsistent and could undermine the delivery of housing. It is not justified and consistent with national policy and could fail to deliver sustainable development in accordance with the framework. The plan is not currently sound. Proposed change: Amend Policy 29 Parts A and B, and the associated explanatory text, specifically paragraphs 10.22 and 10.25, to include flexibility and encourage rather than require; and reduce the level of commuted sum required so that it is consistent with the requirements of the Framework.

Response:

Comment noted. The Local Plan should be read as a whole. Policy 29 is specific to open space and complements policy 66. The provision of a 10 to 15% commuted sum is reasonably related in scale and in kind to the development and is derived through consideration of spatially specific local open space provision. The green space audit (and subsequent updates) identifies open space provision by community. The figures of 10 and 15% are adapted from the Fields in Trust guidelines for open space requirements (see Fields in Trust 2.4Ha standard). NPPF paragraphs 8b and c identifies the social and environmental objectives of the NPPF. Including the need to provide open spaces that reflect current and future needs and support communities’ health, social and cultural well-being. Paragraph 92a says we must plan positively for the provision of open space and other local services to enhance the sustainability of communities and residential environments. Paragraph 96 states ‘Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. The policy is required to make developments acceptable in planning terms as noted above. The green space audit (and subsequent updates) ensure that obligations are directly related to the development and reasonably related in scale and kind, therefore meeting with paragraph 56 of the NPPF. In terms of Local Plan policy 67 (development viability), we should not be predetermining viability issues at the outset of an application and pass
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10.1. Avant Homes is concerned that the level of new greenspace sought on sites will hinder the ability to deliver new housing efficiently and effectively, therefore consider that the Policy 29 is unsound. Test of Soundness 10.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistent with National Policy Justification 10.3. Avant Homes welcome the revision to the requirement in Part A of the policy which previously required 56sqm of open space per family dwelling. The requirement has been slightly reduced and now seeks between 10 and 15% of the site to be open space on schemes over 20 dwellings. The explanatory text indicates that 15% is required where there is an existing deficiency in open space. Avant Homes still consider that coupled with national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. 10.4. Part B of the policy requires that where sites are adjacent or close to a large open spaces as an alternative to on site open space, a commuted sum of 10 - 15% of the residential land value of the site should be provided. This is excessive, the commuted sum should be derived through consideration of specific local deficiencies in open space provision. The level of commuted sum could undermine the deliverability of the Plan and is not consistent with the principles of the Framework (paragraph 34). Nor is it consistent with the tests for planning obligations (paragraph 56 of the Framework), which seek to ensure that planning obligations are necessary to make the development acceptable, directly related to the development and fairly and reasonably related in scale to the kind of development. Policy 29 states that schemes will only be supported where the required open space is provided. However, this is inconsistent with Policy 66 and 67 which states that contributions will be sought and that viability assessments will be considered on a site specific approach stating that “the Council will take a pragmatic and flexible approach to planning obligations”. 10.5. Flexibility therefore needs to be incorporated into Policy 29, in particular part A and B which reflects Policy 66 and 67. The Local Plan at present is internally inconsistent and could undermine the delivery of housing. 10.7. The Plan is its present form is not justified and is not consistent with national policy. It is considered that the Plan could fail to deliver sustainable development in accordance with the policies in the Framework. 10.8. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 10.9. However, we consider that with increased flexibility in line with policy 66 and 67 the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 10.10. To overcome the objection and address soundness matters, the Council should: - Amend Policy 29 Parts A and B, and the associated explanatory text, specifically paragraphs 10.22 and 10.25, to include flexibility and encourage rather than require; and - Reduce the level of commuted sum required so that it is consistent with the requirements of the Framework.

Summary:
Welcome the revisions to he requirement of Part A which previously required 56sqm of open space per dwelling. Consider that with other policy standard requirements, 10 - 15% could still have implications for housing schemes and delivery. The 10 - 15% commuted sum when adjacent to large open spaces (Part B) is excessive. The level of commuted sum is not consistent with para. 34 of the NPPF or tests for planning obligations (para. 56), which seek to ensure that obligations are necessary to make the development acceptable, directly related to the development and fairly and reasonably related in scale to the kind of development. Policy 29 states that schemes will only be supported when the required open space is provided, but this is inconsistent with policies 66 and 67 which state the council will take a pragmatic approach to obligations. Flexibility therefore needs to be incorporated into Policy 29, in particular part A and B which reflects Policy 66 and 67. The Local Plan at present is internally inconsistent and could undermine the delivery of housing. It is not justified and consistent with national policy and could fail to deliver sustainable development in accordance with the framework. The plan is not currently sound. Proposed change: Amend Policy 29 Parts A and B, and the associated explanatory text, specifically paragraphs 10.22 and 10.25, to include flexibility and encourage rather than require; and reduce the level of commuted sum required so that it is consistent with the requirements of the Framework.

Response:
Comment noted. The Local Plan should be read as a whole. Policy 29 is specific to open space and complements policy 66. The provision of a 10 to 15% commuted sum is reasonably related in scale and in kind to the development and is derived through consideration of spatially specific local open space provision. The green space audit (and subsequent updates) identifies open space provision by community. The figures of 10 and 15% are adapted from the Fields in Trust guidelines for open space requirements (see Fields in Trust 2.4Ha standard). NPPF paragraphs 8b and c identifies the social and environmental objectives of the NPPF. Including the need to provide open spaces that reflect current and future needs and support communities’ health, social and cultural well-being. Paragraph 92a says we must plan positively for the provision of open space; and other local services to enhance the sustainability of communities and residential environments. Paragraph 96 states “Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. The policy is required to make developments acceptable in planning terms as noted above. The green space audit (and subsequent updates) ensure that obligations are directly related to the development and reasonably related in scale and kind, therefore meeting with paragraph 56 of the NPPF. In terms of Local Plan policy 67 (development viability), we should not be predetermining viability issues at the outset of an application and pass
10.1. Avant Homes is concerned that the level of new greenspace sought on sites will hinder the ability to deliver new housing sufficiently and effectively, therefore consider that the Policy 29 is unsound. Test of Soundness 10.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy  Justification 10.3. Avant Homes welcome the revision to the requirement in Part A of the policy which previously required 56sqm of open space per family dwelling. The requirement has been slightly reduced and now seeks between 10 and 15% of the site to be open space on schemes over 20 dwellings. The explanatory text indicates that 15% is required where there is an existing deficiency in open space. Avant Homes still consider that coupled with national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. 10.4. Part B of the policy requires that where sites are adjacent or close to a large open spaces as an alternative to on site open space, a commuted sum of 10 - 15% of the residual land value of the site should be provided. This is excessive, the commuted sum should be derived through consideration of specific local deficiencies in open space provision. The level of commuted sum could undermine the deliverability of the Plan and is not consistent with the principles of the Framework (paragraph 34). Nor is it consistent with the tests for planning obligations ( paragraph 56 of the Framework), which seek to ensure that planning obligations are necessary to make the development acceptable, directly related to the development and fairly and reasonably related in scale and kind to the development. 10.5. Policy 29 states that greenspace is required on site and that schemes will only be supported where the required open space is provided. However, this is inconsistent with Policy 66 and 67 which states that contributions will be sought and that viability assessments will be considered on a site specific approach stating that "the Council will take a pragmatic and flexible approach to planning obligations". 10.6. Flexibility therefore needs to be incorporated into Policy 29, in particular part A and B which reflects Policy 66 and 67. The Local Plan at present is internally inconsistent and could undermine the delivery of housing. 10.7. The Plan is its current form is not justified and is not consistent with national policy. It is considered that the Plan could fail to deliver sustainable development in accordance with the policies in the Framework. 10.8. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 10.9. However, we consider that with increased flexibility in line with policy 66 and 67 the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 10.10. To overcome the objection and address soundness matters, the Council should: - Amend Policy 29 Parts A and B, and the associated explanatory text, specifically paragraphs 10.22 and 10.25, to include flexibility and encourage rather than require; and - Reduce the level of commuted sum required so that it is consistent with the requirements of the Framework.

Summary: Policy 29 - Open space Provision. 1. Level of Green space requirement could impact on deliverability. 2. Part B - commuted sums -this is excessive, could undermine deliverability. 3. Policy not consistent with Policies 66 & 67 re open space requirements. 4. Flexibility need to accord with policies 66 & 67. 5. Amend Parts A & B (and para 10.22 & 10.25) to 'encourage' rather than 'require'.

Response: Comment noted. The Local Plan should be read as a whole. Policy 29 is specific to open space and complements policy 66. The provision of a 10 to 15% commuted sum is reasonably related in scale and in kind to the development and is derived through consideration of spatially specific local open space provision. The green space audit (and subsequent updates) identifies open space provision by community. The figures of 10 and 15% are adapted from the Fields in Trust guidelines for open space requirements (see Fields in Trust 2.4Ha standard). NPPF paragraphs 8b and c identifies the social and environmental objectives of the NPPF. Including the need to provide open spaces that reflect current and future needs and support communities' health, social and cultural well-being. Paragraph 92a says we must plan positively for the provision of open space and other local services to enhance the sustainability of communities and residential environments. Paragraph 96 states ‘Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. The policy is required to make developments acceptable in planning terms as noted above. The green space audit (and subsequent updates) ensure that obligations are directly related to the development and reasonably related in scale and kind, therefore meeting with paragraph 56 of the NPPF. In terms of Local Plan policy 67 (development viability), we should not be predetermining viability issues at the outset of an application and pass these on to other policies in the Local Plan given that the NPPF policy (as quoted above) requires authorities to consider a very wide variety of developer requirements and contributions to make a development acceptable in planning terms.
Policy 29: Open Space Provision in New Developments

Tests of Soundness:
- Positively prepared
- Justified
- Consistent with national

Comment:
10.1. Priority Space is concerned that the level of new greenspace sought on sites will hinder the ability to deliver new housing efficiently and effectively, therefore consider that the Policy 29 is unsound. Test of Soundness 10.2. Priority Space considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistent with National Policy Justification 10.3. Priority Space welcome the revision to the requirement in Part A of the policy which previously required 56sqm of open space per family dwelling. The requirement has been slightly reduced and now seeks between 10 and 15% of the site to be open space on schemes over 20 dwellings. The explanatory text indicates that 15% is required where there is an existing deficiency in open space. Priority Space still consider that coupled with national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. 10.4. Part B of the policy requires that where sites are adjacent or close to a large open spaces as an alternative to on site open space, a commuted sum of 10 - 15% of the residential land value of the site should be provided. This is excessive, the commuted sum should be derived through consideration of specific local deficiencies in open space provision. The level of commuted sum could undermine the deliverability of the Plan and is not consistent with the principles of the Framework (paragraph 34). Nor is it consistent with the tests for planning obligations (paragraph 56 of the Framework), which seek to ensure that planning obligations are necessary to make the development acceptable, directly related to the development and fairly and reasonably related in scale and kind to the development. 10.5. Policy 29 states that greenspace is required on site and that schemes will only be supported where the required open space is provided. However, this is inconsistent with Policy 66 and 67 which states that contributions will be sought and that viability assessments will be considered on a site specific approach stating that “the Council will take a pragmatic and flexible approach to planning obligations”. 10.6. Flexibility therefore needs to be incorporated into Policy 29, in particular part A and B which reflects Policy 66 and 67. The Local Plan at present is internally inconsistent and could undermine the delivery of housing. 10.7. The Plan is its present form is not justified and is not consistent with national policy. It is considered that the Plan could fail to deliver sustainable development in accordance with the policies in the Framework. 10.8. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 10.9. However, we consider that with increased flexibility in line with policy 66 and 67 the Local Plan can be found sound. Priority Space will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 10.10. To overcome the objection and address soundness matters, the Council should: - Amend Policy 29 Parts A and B, and the associated explanatory text, specifically paragraphs 10.22 and 10.25, to include flexibility and encourage rather than require; and - Reduce the level of commuted sum required so that it is consistent with the requirements of the Framework.

Summary:
Policy 29 - Open space Provision. 1. Level of Green space requirement could impact on deliverability. 2. Part B - commuted sums -this is excessive, could undermine deliverability. 3. Policy not consistent with Policies 66 & 67 re open space requirements. 4. Flexibility need to accord with policies 66 & 67. 5. Amend Parts A & B (and para 10.22 & 10.25) to 'encourage' rather than 'require'.

Response:
Comment noted. The Local Plan should be read as a whole. Policy 29 is specific to open space and complements policy 66. The provision of a 10 to 15% commuted sum is reasonably related in scale and in kind to the development and is derived through consideration of spatially specific local open space provision. The green space audit (and subsequent updates) identifies open space provision by community. The figures of 10 and 15% are adapted from the fields in Trust guidelines for open space requirements (see Fields in Trust 2.4Ha standard). NPPF paragraphs 8b and c identifies the social and environmental objectives of the NPPF. Including the need to provide open spaces that reflect current and future needs and support communities' health, social and cultural well-being. Paragraph 92a says we must plan positively for the provision of ? open space? and other local services to enhance the sustainability of communities and residential environments. Paragraph 96 states 'Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. The policy is required to make developments acceptable in planning terms as noted above. The green space audit (and subsequent updates) ensure that obligations are directly related to the development and reasonably related in scale and kind, therefore meeting with paragraph 56 of the NPPF. In terms of Local Plan policy 67 (development viability), we should not be predetermining viability issues at the outset of an application and pass these on to other policies in the Local Plan given that the NPPF policy (as quoted above) requires authorities to consider a very wide variety of developer requirements and contributions to make a development acceptable in planning terms.
10.1. Firsure is concerned that the level of new greenspace sought on sites will hinder the ability to deliver new housing efficiently and effectively, therefore consider that the Policy 29 is unsound. Test of Soundness 10.2. Firsure considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistent with National Policy Justification 10.3. Firsure welcome the revision to the requirement in Part A of the policy which previously required 56sqm of open space per family dwelling. The requirement has been slightly reduced and now seeks between 10 and 15% of the site to be open space on schemes over 20 dwellings. The explanatory text indicates that 15% is required where there is an existing deficiency in open space. Firsure still consider that coupled with national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. 10.4. Part B of the policy requires that where sites are adjacent or close to a large open spaces as an alternative to on site open space, a commuted sum of 10 - 15% of the residential land value of the site should be provided. This is excessive, the commuted sum should be derived through consideration of specific local deficiencies in open space provision. The level of commuted sum could undermine the deliverability of the Plan and is not consistent with the principles of the Framework (paragraph 34). Nor is it consistent with the tests for planning obligations (paragraph 56 of the Framework), which seek to ensure that planning obligations are necessary to make the development acceptable, directly related to the development and fairly and reasonably related in scale and kind to the development. 10.5. Policy 29 states that greenspace is required on site and that schemes will only be supported where the required open space is provided. However, this is inconsistent with Policy 66 and 67 which states that contributions will be sought and that viability assessments will be considered on a site specific approach stating that "the Council will take a pragmatic and flexible approach to planning obligations". 10.6. Flexibility therefore needs to be incorporated into Policy 29, in particular part A and B which reflects Policy 66 and 67. The Local Plan at present is internally inconsistent and could undermine the delivery of housing. 10.7. The Plan is its present form is not justified and is not consistent with national policy. It is considered that the Plan could fail to deliver sustainable development in accordance with the policies in the Framework. 10.8. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 10.9. However, we consider that with increased flexibility in line with policy 66 and 67 the Local Plan can be found sound. Firsure will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 10.10. To overcome the objection and address soundness matters, the Council should: - Amend Policy 29 Parts A and B, and the associated explanatory text, specifically paragraphs 10.22 and 10.25, to include flexibility and encourage rather than require; and - Reduce the level of commuted sum required so that it is consistent with the requirements of the Framework.

Summary:
Concerned that the level of new greenspace sought on sites will hinder the ability to deliver new housing efficiently and effectively ? therefore Policy 29 is unsound. Welcome the revision to the requirement in Part A of the policy which previously required 56sqm of open space per family dwelling. The requirement has been slightly reduced and now seeks between 10 and 15% of the site to be open space on schemes over 20 dwellings. The explanatory text indicates that 15% is required where there is an existing deficiency in open space. Still consider that coupled with national space standards, requirements on mix and other policy standards, there could be implications for potential housing schemes and their delivery and the ability to achieve the housing requirement. Part B of the policy requires that where sites are adjacent or close to a large open spaces as an alternative to on site open space, a commuted sum of 10 - 15% of the residential land value of the site should be provided. This is excessive, the commuted sum should be derived through consideration of specific local deficiencies in open space provision. The level of commuted sum could undermine the deliverability of the Plan and is not consistent with the principles of the Framework. Nor is it consistent with the tests for planning obligations (paragraph 56 of the Framework), which seek to ensure that planning obligations are necessary to make the development acceptable, directly related to the development and fairly and reasonably related in scale and kind to the development. Policy 29 states that greenspace is required on site and that schemes will only be supported where the required open space is provided. However, this is inconsistent with Policy 66 and 67 which states that contributions will be sought and that viability assessments will be considered on a site specific approach stating that "the Council will take a pragmatic and flexible approach to planning obligations". Flexibility therefore needs to be incorporated into Policy 29, in particular part A and B which reflects Policy 66 and 67. The Local Plan at present is internally inconsistent and could undermine the delivery of housing.
Comment noted. The Local Plan should be read as a whole. Policy 29 is specific to open space and complements policy 66. The provision of a 10 to 15% commuted sum is reasonably related in scale and in kind to the development and is derived through consideration of spatially specific local open space provision. The green space audit (and subsequent updates) identifies open space provision by community. The figures of 10 and 15% are adapted from the Fields in Trust guidelines for open space requirements (see Fields in Trust 2.4Ha standard). NPPF paragraphs 8b and c identifies the social and environmental objectives of the NPPF. Including the need to provide open spaces that reflect current and future needs and support communities’ health, social and cultural well-being. Paragraph 92a says we must plan positively for the provision of open space and other local services to enhance the sustainability of communities and residential environments. Paragraph 96 states ‘Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. The policy is required to make developments acceptable in planning terms as noted above. The green space audit (and subsequent updates) ensure that obligations are directly related to the development and reasonably related in scale and kind, therefore meeting with paragraph 56 of the NPPF. In terms of Local Plan policy 67 (development viability), we should not be predetermining viability issues at the outset of an application and pass these on to other policies in the Local Plan given that the NPPF policy (as quoted above) requires authorities to consider a very wide variety of developer requirements and contributions to make a development acceptable in planning terms.
10.4. Part B of the policy requires that where sites are adjacent or close to a large open spaces as an alternative to on site open space, a commuted sum of 10 - 15% of the residential land value of the site should be provided. This is excessive, the commuted sum should be derived through consideration of specific local deficiencies in open space provision. The level of commuted sum could undermine the deliverability of the Plan and is not consistent with the principles of the Framework (paragraph 34). Nor is it consistent with the tests for planning obligations (paragraph 56 of the Framework), which seek to ensure that planning obligations are necessary to make the development acceptable, directly related to the development and fairly and reasonably related in scale and kind to the development. 10.5. Policy 29 states that greenspace is required on site and that schemes will only be supported where the required open space is provided. However, this is inconsistent with Policy 66 and 67 which states that contributions will be sought and that viability assessments will be considered on a site specific approach stating that "the Council will take a pragmatic and flexible approach to planning obligations". 10.6. Flexibility therefore needs to be incorporated into Policy 29, in particular part A and B which reflects Policy 66 and 67. The Local Plan at present is internally inconsistent and could undermine the delivery of housing. 10.7. The Plan is its present form is not justified and is not consistent with national policy. It is considered that the Plan could fail to deliver sustainable development in accordance with the policies in the Framework. 10.8. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 10.9. However, we consider that with increased flexibility in line with policy 66 and 67 the Local Plan can be found sound. Metroland will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 10.10. To overcome the objection and address soundness matters, the Council should: - Amend Policy 29 Parts A and B, and the associated explanatory text, specifically paragraphs 10.22 and 10.25, to include flexibility and encourage rather than require; and - Reduce the level of commuted sum required so that it is consistent with the requirements of the Framework.

Summary:

Policy 29 - Open space Provision. 1. Level of Green space requirement could impact on deliverability. 2. Part B - commuted sums -this is excessive, could undermine deliverability. 3. Policy not consistent with Policies 66 & 67 re open space requirements. 4. Flexibility need to accord with policies 66 & 67. 5. Amend Parts A & B (and para 10.22 & 10.25) to 'encourage' rather than 'require'.

Response:

Comment noted. The Local Plan should be read as a whole. Policy 29 is specific to open space and complements policy 66. The provision of a 10 to 15% commuted sum is reasonably related in scale and in kind to the development and is derived through consideration of spatially specific local open space provision. The green space audit (and subsequent updates) identifies open space provision by community. The figures of 10 and 15% are adapted from the Fields in Trust guidelines for open space requirements (see Fields in Trust 2.4Ha standard). NPPF paragraphs 8b and c identifies the social and environmental objectives of the NPPF. Including the need to provide open spaces that reflect current and future needs and support communities' health, social and cultural well-being. Paragraph 92a says we must plan positively for the provision of open space and support communities' health, social and cultural well-being. Paragraph 96 states ‘Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. The policy is required to make developments acceptable in planning terms as noted above. The green space audit (and subsequent updates) ensure that obligations are directly related to the development and reasonably related in scale and kind, therefore meeting with paragraph 56 of the NPPF. In terms of Local Plan policy 67 (development viability), we should not be predetermining viability issues at the outset of an application and pass these on to other policies in the Local Plan given that the NPPF policy (as quoted above) requires authorities to consider a very wide variety of developer requirements and contributions to make a development acceptable in planning terms.
Policy 29: Open Space Provision in New Developments states that development proposals for 20 family dwellings or more will be supported where they provide between 10-15% of the site area to be provided as on-site open space and where such development is adjacent or close to a large open space may be asked to provide a commuted sum of 10% or 15% of the residential land value of the development site. Persimmon Homes agrees that public open space is required to form sustainable communities. However, there needs to be a clear and transparent method, provided by the Council, for calculating the percentage of public open space required on site. The Council's proposals for a commuted sum as an alternative to on-site open space, which suggests a sum of 10-15% of the residential land value, is overly excessive and will threaten the deliverability of sites. Any commuted sum should be reasonably related in scale and in kind to the development and should be derived through consideration of specific deficiencies in local open space provision. This policy is not consistent with the NPPF or the legal tests for planning obligations, which are set out in the CIL Regulations and at paragraph 56 of the Framework. To address our objection, the policy should be revised to provide a clear and transparent method for calculating the quantum of on-site open space required, and the commuted sum payable for off-site provision should be reduced to ensure that it is consistent with national policy.

Policy 29 should include a clear and transparent method for calculating the percentage of public open space required on site. The proposals for a commuted sum as an alternative to on-site open space, which suggests a sum of 10-15% of the residential land value, is overly excessive and will threaten the deliverability of sites. Any commuted sum should be reasonably related in scale and in kind to the development and should be derived through consideration of specific deficiencies in local open space provision. This policy is not consistent with the NPPF or the legal tests for planning obligations, which are set out in the CIL Regulations and at paragraph 56 of the Framework. To address our objection, the policy should be revised to provide a clear and transparent method for calculating the quantum of on-site open space required, and the commuted sum payable for off-site provision should be reduced to ensure that it is consistent with national policy.

Summary:

Policy 29 should include a clear and transparent method for calculating the percentage of public open space required on site. The proposals for a commuted sum as an alternative to on-site open space, which suggests a sum of 10-15% of the residential land value, is overly excessive and will threaten the deliverability of sites. Any commuted sum should be reasonably related in scale and in kind to the development and should be derived through consideration of specific deficiencies in local open space provision. This policy is not consistent with the NPPF or the legal tests for planning obligations, which are set out in the CIL Regulations and at paragraph 56 of the Framework. To address our objection, the policy should be revised to provide a clear and transparent method for calculating the quantum of on-site open space required, and the commuted sum payable for off-site provision should be reduced to ensure that it is consistent with national policy.

Response:

Comment noted, we also acknowledge that open space is required for sustainable communities. The provision of a 10 to 15% commuted sum is reasonably related in scale and in kind to the development and is derived through consideration of spatially specific local open space provision. The green space audit (and subsequent updates) identifies open space provision by community. The figures of 10 and 15% are adapted from the Fields in Trust guidelines for open space requirements (see Fields in Trust 2.4Ha standard). NPPF paragraphs 8b and c identifies the social and environmental objectives of the NPPF. Including the need to provide open spaces that reflect current and future needs and support communities' health, social and cultural well-being. Paragraph 92a says we must plan positively for the provision of open space and other local services to enhance the sustainability of communities and residential environments. Paragraph 96 states 'Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. The policy is required to make developments acceptable in planning terms as noted above. The green space audit (and subsequent updates) ensure that obligations are directly related to the development and reasonably related in scale and kind. Therefore meeting with paragraph 56 of the NPPF. Green space provision also contributes to green infrastructure requirements in line with NPPF paragraph 20 (d) identifies strategic policies should make sufficient provision for green infrastructure. Paragraph 91 (c) identifies the role of green infrastructure in the achieving healthy and inclusive safe places.
Policy 29: Open Space Provisions in New Developments states that development proposals for 20 family dwellings or more will be supported where they provide between 10-15% of the site area to be provided as on-site open space and where such development is adjacent or close to a large open space may be asked to provide a commuted sum of 10% or 15% of the residential land value of the development site. Persimmon Homes agrees that public open space is required to form sustainable communities. However, there needs to be a clear and transparent method, provided by the Council, for calculating the percentage of public open space required on site. The Council’s proposals for a commuted sum as an alternative to on-site open space, which suggests a sum of 10-15% of the residential land value, is overly excessive and will threaten the deliverability of sites. Any commuted sum should be reasonably related in scale and in kind to the development and should be derived through consideration of specific deficiencies in local open space provision. This policy is not consistent with the NPPF or the legal tests for planning obligations, which are set out in the CIL Regulations and at paragraph 56 of the Framework. To address our objection, the policy should be revised to provide a clear and transparent method for calculating the quantum of on-site open space required, and the commuted sum payable for off-site provision should be reduced to ensure that it is consistent with national policy.

**Summary:**
Policy 29 should include a clear and transparent method for calculating the percentage of public open space required on site. The proposals for a commuted sum as an alternative to on-site open space, which suggests a sum of 10-15% of the residential land value, is overly excessive and will threaten the deliverability of sites. Any commuted sum should be reasonably related in scale and in kind to the development and should be derived through consideration of specific deficiencies in local open space provision. This policy is not consistent with the NPPF or the legal tests for planning obligations, which are set out in the CIL Regulations and at paragraph 56 of the Framework.

**Response:**
Comment noted, we also acknowledge that open space is required for sustainable communities. The provision of a 10 to 15% commuted sum is reasonably related in scale and in kind to the development and is derived through consideration of spatially specific local open space provision. The green space audit (and subsequent updates) identifies open space provision by community. The figures of 10 and 15% are adapted from the Fields in Trust guidelines for open space requirements (see Fields in Trust 2.4Ha standard). NPPF paragraphs 8b and c identifies the social and environmental objectives of the NPPF. Including the need to provide open spaces that reflect current and future needs and support communities' health, social and cultural well-being. Paragraph 92a says we must plan positively for the provision of open space and other local services to enhance the sustainability of communities and residential environments. Paragraph 96 states 'Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. The policy is required to make developments acceptable in planning terms as noted above. The green space audit (and subsequent updates) ensure that obligations are directly related to the development and reasonably related in scale and kind. Therefore meeting with paragraph 56 of the NPPF. Green space provision also contributes to green infrastructure requirements in line with NPPF paragraph 20 (d) identifies strategic policies should make sufficient provision for green infrastructure. Paragraph 91 (c) identifies the role of green infrastructure in the achieving healthy and inclusive safe places.
Policy 29 sets out the requirements for the provision of open space in connection with large residential developments. This is to be provided on-site. However, there are instances where it is more effective for the provision of open space and recreational facilities to be provided off-site such as the diversion of funds towards the improvement of an existing local facility which will bring greater benefit to the local community. In such instances, a facility for developer contributions towards off-site provision or the improvement of existing off-site provision should be available.

Objection is made to the drafting of Policy 29 - Open Space Provision in New Developments to incorporate alternative provision or enhancement through the payment of developer contributions. As such the following amendments to Policy 29 are sought: "To address local green (open) space needs and deficiencies, development proposals: A) of 20 family dwellings or more will be supported which contribute 10% or 15% of the site as on-site open space to benefit the development itself - the nature and type of which will be determined by having regard to the Council’s Green Space Audit and Playing Pitch Strategy OR where the enhancement of local facilities will provide a greater benefit to the local community, a proportionate developer contribution towards this. Reason: in order to contribute to place-making and enhanced benefit of the local community.

Policy 29 - Open space Provision in New Development. Suggest that the policy is amended to allow for potential contributions towards 'off site' enhancement of local facilities to provide a greater benefit to the local community. The representation includes a suggested re-wording of the Policy

Response:
Comment noted no change proposed. Policy 29 part B covers the enhancement of local facilities adjacent to or close to a development proposal, where this will provide a greater benefit to the local community
2.50 Policy 29 states the following with regard to open space provision: To address local green (open) space needs and deficiencies, development proposals: a) of 20 family dwellings or more will be supported which contribute 10% or 15% of the site as on-site open space to benefit the development itself - the nature and type of which will be determined by having regard to the Council’s Green Space Audit and Playing Pitch Strategy. b) of 20 family dwellings or more, adjacent or close to a large open space (such as a public park or recreation area) alternatively may be asked to provide a commuted sum of 10% or 15% of the residential land value of the development site. c) of between 10 and 20 family dwellings will be supported which provide for a commuted sum of 10% or 15% of the residential land value of the development site to improve existing open spaces within the vicinity of the development. d) for retirement living schemes and / or aftercare facilities will be required to provide good quality on-site amenity spaces equating to 16sqm of open space per person. e) providing on-site open space will be required to provide for sustainable open space management and maintenance to be determined in discussion with the planning authority. 2.51 It is of note that Policy 29 reiterates extant UDP Policy RL4, which requires 10 - 15% on-site provision or a commuted sum in lieu of provision on-site dependent on site specific circumstances (the number of dwellings proposed for example). The draft policy does not appear to be based on, or justified by, an up to date evidence base. 2.52 It is of note that the ‘close’ [to a large open space ?] in part 29(b) of the policy is not defined within the policy to enable understanding when the clause might be triggered. 2.54 It is also proposed to calculate the commuted sums based on residential land value, a figure which is unlikely to be agreed at the planning stage and will create an unacceptable circularity issue to the policy. In light of these points, we object to the current wording of Policy 29. Recommendation 2.55 The Council’s Green Space Audit should be updated and then periodically reviewed so that the information being relied upon is kept up to date. The threshold requirements should be set with reference to this evidence. 2.56 The word “close” [to a large open space?] should be specifically defined within the policy itself or within a glossary to provide clarity for future applications. 2.57 All reference to calculating off-site contributions based on “residential land value” should be deleted from Policy 29. 2.58 The Council should base their commuted sum value for off-site open space provision on a justified calculation, which is secured through a CIL and / or S106 agreement (as appropriate) so that future developers understand what the costs will be. Justification 2.59 The general objective of Policy 29 is understood. However, the policy should be clear so that future developers understand what the open space requirements are. 2.60 Currently, Policy 29 is inadequately clear with references to an evidence base document that is out of date. It also seeks to calculate a commuted sum based on information that will not be agreed / disclosed at the planning application stage.

Summary:
Policy 29: Open Space Provision in New Developments 1. Green space audit which is evidence for this Policy is considered out of date (2013). 2. The word “close” [to a large open space?] in part 29(b) of the policy is not defined within the policy to enable understanding when the clause might be triggered. 3. The Council should base their commuted sum value for off-site open space provision on a justified calculation, which is secured through a CIL and / or S106 agreement (as appropriate) so that future developers understand what the costs will be. 4. Policy seeks to calculate a commuted sum based on information that will not be agreed / disclosed at the planning application stage. The general objective of Policy 29 is understood. However, the policy should be clear so that future developers understand what the open space requirements are.

Response:
We acknowledge the date of the Green space audit and we are currently working on a review. The timescale of which will be determined in line with the Local Plan. The open spaces shown on the policies map are part of the first stage review. In terms of using the word ‘close’ in policy 29.B, the 2013 green space audit shows Fields in Trust walking distances and buffers, these will be used to determine closeness of a proposed development site to an open space. These distances will not change in a reviewed greenspace audit. The calculation of commuted sums is currently based on the residential land value of the site and has been used since the adoption of the 1998 UDP. It will not therefore provide an ‘unacceptable circularity issue’. Securing the commuted sums is provided through S106 agreements, once a land value has been determined.
Tests of Soundness:

Comment:

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.

Summary:

Policy 29 Green space provision. o Supports incorporating additional green space within new communities. o 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. o May also impact on housing density.

Response:

Comment noted. The provision of a 10 to 15% commuted sum is reasonably related in scale and in kind to the development and is derived through consideration of spatially specific local open space provision. The green space audit (and subsequent updates) identifies open space provision by community. The figures of 10 and 15% are adapted from the Fields in Trust guidelines for open space requirements (see Fields in Trust 2.4Ha standard). NPPF paragraphs 8b and c identifies the social and environmental objectives of the NPPF. Including the need to provide open spaces that reflect current and future needs and support communities’ health, social and cultural well-being. Paragraph 92a says we must plan positively for the provision of open space and other local services to enhance the sustainability of communities and residential environments. Paragraph 96 states ‘Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. The policy is required to make developments acceptable in planning terms as noted above. The green space audit (and subsequent updates) ensure that obligations are directly related to the development and reasonably related in scale and kind, therefore meeting with paragraph 56 of the NPPF. Green space provision also contributes to green infrastructure requirements in line with NPPF paragraph 20 (d) identifies strategic policies should make sufficient provision for green infrastructure.
Key sites and/or habitats should not be seen in isolation from the networks that link them. Giving sites and networks two separate policies fails to make explicit the absolute link that must be made between them. Making our proposed changes to Policies 30 and 31 would encompass that holistic approach, meet the Lawton Review’s principles (quoted in para 5.27) of ‘bigger, better, more and joined’ habitats and of the Government’s 2018 25-year Environment Plan’s proposals for Nature Recovery Network, and the NPPF paras 170(d) and 174, which consistently puts habitats and networks together. Policy 31 is weak and does not comply with NPPF paras 175-176. PROPOSED CHANGE Policy 30 Ecological Networks should be part of Policy 31 Valuing Biodiversity and Geodiversity, creating one coherent policy. Delete Policy 30 and revise Policy 31 as follows.

Proposed change: Policy 30 should be part of Policy 31, creating a coherent, holistic policy. Giving sites and networks two separate policies fails to make explicit the absolute link that must be made between them.

Response:
Noted however it is not considered necessary to combine the policies. An additional sentence has been added to bullet point C to reiterate the importance of the ecological network with respect to SSSI’s. Some of the proposed changes duplicate the NPPF policy and advice is that Local Plans should not simply repeat the guidance in the NPPF.
We are encouraged to see the consideration and work towards Nature Recovery Networks and identification of biodiversity opportunity areas across Doncaster.

**Summary:**

We are encouraged to see the consideration and work towards Nature Recovery Networks and identification of biodiversity opportunity areas across Doncaster.

**Response:**

Support welcomed
3.45 Policy 30 states that: Proposals will only be supported which deliver a net gain for biodiversity and protect, create, maintain and enhance the Borough’s ecological networks by: a) being of an appropriate size, scale and type in relation to their location within and impact on the ecological network; b) maintaining, strengthening and bridging gaps in existing habitats networks; c) planting native species and creating new, or restoring existing, national and local priority habitats and / or species; and d) working with strategic partnerships to deliver conservation projects at a landscape scale where appropriate. 3.46 It is of note that there is no reference within the policy or the supporting text to possible mitigation measures or biodiversity offsetting calculations should a development proposal creates a biodiversity loss. In light of this, we object to the current wording of Policy 30. Recommendations 3.47 Policy 30 should refer to supplementary guidance (to be prepared) regarding possible mitigation measures and biodiversity offsetting calculations, so that the policy requirement is fully understood with reference to guidance in the Framework. Justification 3.48 Policy 30 is inadequately clear or effective as currently drafted.

Summary:
Object to Policy 30 - there is no reference within the policy or the supporting text to possible mitigation measures or biodiversity offsetting calculations should a development proposal creates a biodiversity loss. Policy 30 should refer to supplementary guidance (to be prepared) regarding possible mitigation measures and biodiversity offsetting calculations, so that the policy requirement is fully understood with reference to guidance in the Framework. As drafted it is inadequately clear.

Response:
Policy 31 provides more information about requirements for net gain, biodiversity offsetting calculations and the use of the mitigation hierarchy. All policies must be read in conjunction with one another. The impacts of an application on the ecological network would be considered in light of any proposed mitigation as they would be considered against all policies. It is intended to prepare further information supplementary to the Local Plan about the Council’s requirements for delivering net gain.
Policy 30 states that: Proposals will only be supported which deliver a net gain for biodiversity and protect, create, maintain and enhance the Borough's ecological networks by: a) being of an appropriate size, scale and type in relation to their location within and impact on the ecological network; b) maintaining, strengthening and bridging gaps in existing habitats networks; c) planting native species and creating new, or restoring existing, national and local priority habitats and / or species; and d) working with strategic partnerships to deliver conservation projects at a landscape scale where appropriate. 2.51 It is of note that there is no reference within the policy or the supporting text to possible mitigation measures or biodiversity offsetting calculations should a development proposal creates a biodiversity loss. In light of this, we object to the current wording of Policy 30. Recommendations 2.52 Policy 30 should refer to supplementary guidance (to be prepared) regarding possible mitigation measures and biodiversity offsetting calculations, so that the policy requirement is fully understood with reference to guidance in the Framework. Justification 2.53 Policy 30 is inadequately clear or effective as currently drafted.

Summary:
Policy 30 - summary of text There is no reference within the policy or supporting text to possible mitigation measures or biodiversity offsetting calculations should a development proposal create a biodiversity loss. We therefore we object to the current wording of Policy 30. Policy 30 should refer to supplementary guidance regarding possible mitigation measures and biodiversity offsetting calculations, so that the policy requirement is fully understood with reference to guidance in the Framework.

Response:
Policy 31 provides more information about requirements for net gain, biodiversity offsetting calculations and the use of the mitigation hierarchy. All policies must be read in conjunction with one another. The impacts of an application on the ecological network would be considered in light of any proposed mitigation as they would be considered against all policies. It is intended to prepare further information supplementary to the Local Plan about the Council's requirements for delivering net gain.
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It is recommended that more detail is provided on the application of net gain and how it will achieve a measurable net gain. The policy could do with some rewording to make it clear on what is expected for different development types. If the LPA propose to take a biodiversity net gain approach for all major development and proposals that are likely to result in a biodiversity effect, it needs to be clear on what criteria will be used to judge the need for measurable net gain, i.e. how will likely biodiversity effects be determined and if a developer mitigates effects through design of the proposal how will this be taken into account. Further detail in the supporting text relating to the mitigation hierarchy would be beneficial to ensure clarity that biodiversity net gain complements the hierarchy and all developments should seek to avoid impacts before considering mitigation and finally compensation. As outlined in Planning Practice biodiversity net gain does not override the protection for designated sites, protected or priority species and irreplaceable or priority habitats set out in the NPPF. The policy will need to ensure that habitat improvement will be a genuine additional benefit, and go further than measures already required to implement a compensation strategy. In summary, this plan could do with further detail on what actually underpins the policies in terms of evidence that is needed and be clearer as to what is required to achieve a 'measurable' net gain compared to general enhancement opportunities which will not be required to use the metric or provide ecological assessment.

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Response:  
Noted. Additional text has been added to the supporting text of the policy and it is intended to prepare further information supplementary to the Local Plan about the Council’s requirements for delivering net gain.
8.1 Peel has a number of comments on the LP’s other strategic and non-strategic policies as currently drafted. These are summarised below:

8.7 A policy amendment is suggested below to ensure consistency with the NPPF: "Proposals should deliver a net gain for biodiversity wherever possible and protect, create, maintain and enhance the borough’s ecological networks by: A) being of an appropriate size, scale, and type in relation to their location within and impact on the ecological network; B) maintaining, strengthening and bridging gaps in existing habitat networks; C) planting native species and creating new, or restoring existing, national and local priority habitats and/or species; and D) working with strategic partnerships to deliver conservation projects at a landscape scale where appropriate."

Response:
Disagree with proposed change. Net gain is a requirement of the NPPF not just in cases 'where possible'.
Comment Ref: C/Policy 30/05014/1/006
Attend Examination: Not Stated

Reason:
Area: Chapter 10: Green Infrastructure
Policy: Policy 30: Ecoloigcal Networks

Tests of Soundness:

Comment:
UKOOG Response: The policy states; ‘Proposals will only be supported which deliver a net gain for biodiversity and protect, create, maintain and enhance the Borough’s ecological networks by: A) being of an appropriate size, scale and type in relation to their location within and impact on the ecological network; B) maintaining, strengthening and bridging gaps in existing habitat networks; C) planting native species and creating new, or restoring existing, national and local priority habitats and/or species; and D) working with strategic partnerships to deliver conservation projects at a landscape scale where appropriate’. Onshore oil and gas sites are temporary in nature and do provide a good opportunity, post decommissioning, to be restored to an enhanced environmental condition that maximises habitat creation and an overall net gain in biodiversity, which should be considered at application stage. For exploration and appraisal developments, which may be in place for less than 2 years, long term biodiversity net gain, may not be achievable.

Summary:
Policy 30. Comment? Onshore oil and gas sites are temporary in nature and provide a good opportunity, post decommissioning, to be restored to an enhanced environmental condition that maximises habitat creation and an overall net gain in biodiversity. Long term biodiversity net gain may not be achievable at exploration and appraisal stages

Response:
Comment noted. See minerals policy and paragraph 14.33 which covers temporary nature of mineral workings. Applications will be dealt with on a case by case basis, using relevant policies in the Local Plan and national policy / guidance, whilst taking account of which stage the development proposal is at.
Comment Ref: /Para 10.36/05059/1/012

Attend Examination: Attend Hearing

Reason: I would be willing to appear at the Examination if that would assist the Independent Planning Inspector. Please also do let me know if you have any queries.

Area: Chapter 10: Green Infrastructure

Policy: Policy 30: Ecological Networks

Tests of Soundness: Justified Consistent with national

Comment:
The emphasis of nature conservation is shifting from protecting wildlife solely within discrete sites to establishing a network of core areas of habitat that are robustly linked together through habitat corridors resilient to environmental change and human pressure. An independent review of England’s wildlife sites and ecological network made five key recommendations: to improve management of existing wildlife sites; to increase the size of existing wildlife sites; to improve the connections between sites; to create new sites; and to reduce the pressure on wildlife by improving the wider environment. Comment: As noted earlier, this site is adjacent to/ is part of the habitat corridors noted in Figure 8 of the Local Plan and therefore should not be developed. The Local Plan breaches this paragraph as the Site could and should be used to fulfil all 5 criteria set out in the independent review given its location directly next to a LNR/SSSI and on a wildlife corridor.

Summary:
Site Ref 350/407 - Rosehill - This site is adjacent to/ is part of the habitat corridors noted in Figure 8 of the Local Plan and therefore should not be developed. The Local Plan breaches this paragraph as the Site could and should be used to fulfil all 5 criteria set out in the independent review given its location directly next to a LNR/SSSI and on a wildlife corridor.

Response:
Comment noted. The site (350/407) is identified as a housing sites not green infrastructure (GI). Housing sites have developer requirements which will provide GI assets as part of the proposal. Comments refer to a site proposed for development rather than the specifics of the policy.
IGas supports the intentions of the respective policies. Oil and gas development for the extraction of shale gas using hydraulic fracturing is prohibited from Sites of Special Scientific Interest (SSSI), Areas of Outstanding Natural Beauty (AONB) and National Parks; other onshore oil and gas development proposals should be considered on a case by case basis, which aligns with the NPPF, Planning Practice Guidance and the WMS 2018. It is important to recognise that mineral operations including onshore oil and gas sites are temporary in nature and provide a clear opportunity, post decommissioning, for sites to be restored to an enhanced environmental condition, for example; a site can be redeveloped to maximise habitat potential and improve biodiversity, which should be considered when assessing a planning application. It should also be recognised that onshore oil and gas developments for exploration and appraisal developments are very short in duration and small in footprint compared to aggregate mineral extraction operations which often occur over extended time periods and over much bigger areas. If onshore oil and gas operations extend into production, the land use footprint is still very small. Consequently, net gain may not be necessary or appropriate in all cases and particularly at the exploration and appraisal stages. This can be assessed on a case by case basis.

Summary:
Policy 30 and 31. Supports intentions of policies. But, should recognise the temporary nature of minerals and sites can be redeveloped to maximise habitats and biodiversity. Net gain may not be necessary or appropriate at hydrocarbon exploration and appraisal phases.

Response:
Comment noted. The local plan should be read as a whole. See paragraph 14.33, which covers temporary nature of mineral workings.
2.61 Policy 30 states that: Proposals will only be supported which deliver a net gain for biodiversity and protect, create, maintain and enhance the Borough’s ecological networks by: a) being of an appropriate size, scale and type in relation to their location within and impact on the ecological network; b) maintaining, strengthening and bridging gaps in existing habitats networks; c) planting native species and creating new, or restoring existing, national and local priority habitats and / or species; and d) working with strategic partnerships to deliver conservation projects at a landscape scale where appropriate. 2.62 It is of note that there is no reference within the policy or the supporting text to possible mitigation measures or biodiversity offsetting calculations should a development proposal creates a biodiversity loss. In light of this, we object to the current wording of Policy 30. Recommendations 2.63 Policy 30 should refer to supplementary guidance (to be prepared) regarding possible mitigation measures and biodiversity offsetting calculations, so that the policy requirement is fully understood with reference to guidance in the Framework. Justification 2.64 Policy 30 is inadequately clear or effective as currently drafted and could undermine the delivery of the Plan if the required contribution is not adequately considered within the Local Plan viability evidence.

Summary:
Policy 30: Ecological Networks  1. Is inadequately clear or effective as currently drafted and could undermine the delivery of the Plan if the required contribution is not adequately considered within the Local Plan viability evidence.  2. Should refer to supplementary guidance (to be prepared) regarding possible mitigation measures and biodiversity offsetting calculations, so that the policy requirement is fully understood with reference to guidance in the Framework.

Response:
Policy 31 provides more information about requirements for net gain, biodiversity offsetting calculations and the use of the mitigation hierarchy. All policies must be read in conjunction with one another. The impacts of an application on the ecological network would be considered in light of any proposed mitigation as they would be considered against all policies. It is intended to prepare further information supplementary to the Local Plan about the Council’s requirements for delivering net gain.
Areas of high biodiversity and geodiversity value must be protected and enhanced. Enhancement measures will include increasing the total area of valuable habitat in the Borough, and linking up existing areas of high value habitat such as ‘ecological stepping stone sites’, ‘wildlife corridors’ and ‘Nature Improvements Areas’ to create coherent and continuous ecological networks. Ecological networks and connectivity are vitally important in sustaining sites and addressing the impacts of climate change. The overall aim is to work in partnership to deliver conservation gain at a landscape scale. Proposals will only be supported which deliver a net gain for biodiversity and protect, create, maintain and enhance the Borough’s ecological networks and sites through the following principles: A) 1,2,4,5,6, unchanged A) 3. They protect restore and enhance and provide appropriate buffers around wildlife and geological features, and aim to link these to, and enhance, the wider ecological networks. Existing habitat networks will be maintained and strengthened, and gaps will be bridged to create a coherent network A) 7. When creating new, or restoring existing, national and local priority habitats and networks all planting will be of native species; B. Development proposals which may adversely affect the integrity of a site with one or more of the following international designations: i. Special Protection Areas (SPAs) ii. Special Areas of Conservation (SACs) iii. Ramsar site iv. Any potential Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or proposed Ramsar site v. Sites identified, or required, as compensatory measures for adverse effects on European sites, candidate Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites will not be permitted unless it has been demonstrated that there are no alternative solutions, there are imperative reasons of overriding public interest and that compensatory measures provide net gain to the habitats and species. The overall coherence of the network of the designations must be shown to be protected. C. In order to ensure development does not negatively impact on nightjar populations, proposals located within 3km of Thorne and Hatfield Moors Special Protection Area, that impact habitats that nightjars may use for feeding on, will only be supported where they deliver a net gain in nightjar foraging habitat. D. Development proposals which are likely to have an adverse impact on a Site of Special Scientific Interest (SSSI) will not normally be permitted. Where an adverse effect on the site’s notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest. E. Development proposals which are likely to have a significant adverse impact on a site with one or more of the following local or regional designations, habitats or species will not be permitted except where the reasons for or benefits of the proposed development outweigh the impact of the development: i. Local Nature Reserves ii. Sites of Biological Importance (SBI) or Local Wildlife Sites iii. Regionally Important Geological and Geomorphological Sites (RIGGS) iv. Designated and/or important wildlife corridors and stepping stones v. Nature Improvement Area vi. Habitats and species within the Doncaster Biodiversity Action Plan vii. National priority species and habitats (commonly known as ‘UK BAP priority habitats and species’) published for England under the requirements of Section 41 of the Natural Environment and Rural Communities Act 2006. F. All development (including conversions and that on brownfield and greenfield sites) must aim to positively contribute to the conservation and enhancement of biodiversity and geodiversity and should not negatively affect these interests. When appropriate, conditions will be put in place to make sure appropriate monitoring is undertaken and make sure mitigation, compensation and offsetting is effective. G. Development proposals that are likely to have a significant impact on a non-designated asset or a site valued by the local community identified in a Neighbourhood Plan or the Site Allocations and Development Policies documents will only be permitted where suitable mitigation and / or compensation is provided to address the adverse impacts of the proposed development, or where any residual harm following mitigation/compensation along with other harm, is clearly outweighed by the benefit of the development. Summary: Areas of high biodiversity and geodiversity value must be protected and enhanced. Enhancement measures will include increasing the total area of valuable habitat in the Borough, and linking up existing areas of high value habitat such as ‘ecological stepping stone sites’, ‘wildlife corridors’ and ‘Nature Improvements Areas’ to create coherent and continuous ecological networks. Ecological networks and connectivity are vitally important in sustaining sites and addressing the impacts of climate change. The overall aim is to work in partnership to deliver conservation gain at a landscape scale. Proposals will only be supported which deliver a net gain for biodiversity and protect, create, maintain and enhance the Borough’s ecological networks and sites through the following principles: A) 1,2,4,5,6, unchanged A) 3. They protect restore and enhance and provide appropriate buffers around wildlife and geological features, and aim to link these to, and enhance, the wider ecological networks. Existing habitat networks will be maintained and strengthened, and gaps will be bridged to create a coherent network A) 7. When creating new, or restoring existing, national and local priority habitats and networks all planting will be of native species; B. 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not negatively impact on nightjar populations, proposals located within 3km of Thorne and Hatfield Moors Special Protection Area, that impact habitats that nightjars may use for feeding on, will only be supported where they deliver a net gain in nightjar foraging habitat. D. Development proposals which are likely to have an adverse impact on a Site of Special Scientific Interest (SSSI) will not normally be permitted. Where an adverse effect on the site’s notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest. E. Development proposals which are likely to have a significant adverse impact on a site with one or more of the following local or regional designations, habitats or species will not be permitted except where the reasons for or benefits of the proposed development outweigh the impact of the development: i. Local Nature Reserves ii. Sites of Biological Importance (SBI) or Local Wildlife Sites iii. Regionally Important Geological and Geomorphological Sites (RIGGS) iv. Designated and/or important wildlife corridors and stepping stones v. Nature Improvement Area vi. Habitats and species within the Doncaster Biodiversity Action Plan vii. National priority species and habitats (commonly known as 'UK BAP priority habitats and species') published for England under the requirements of Section 41 of the Natural Environment and Rural Communities Act 2006. F. All development (including conversions and that on brownfield and greenfield sites) must aim to positively contribute to the conservation and enhancement of biodiversity and geodiversity and should not negatively affect these interests. When appropriate, conditions will be put in place to make sure appropriate monitoring is undertaken and make sure mitigation, compensation and offsetting is effective. G. Development proposals that are likely to have a significant impact on a non-designated asset or a site valued by the local community identified in a Neighbourhood Plan or the Site Allocations and Development Policies documents will only be permitted where suitable mitigation and / or compensation is provided to address the adverse impacts of the proposed development, or where any residual harm following mitigation/compensation along with other harm, is clearly outweighed by the benefit of the development.

Response:

Noted however it is not considered necessary to combine the policies. An additional sentence has been added to bullet point C to reiterate the importance of the ecological network with respect to SSSI’s. Some of the proposed changes duplicate the NPPF policy and advice is that Local Plans should not simply repeat the guidance in the NPPF.
Comment: Key sites and/or habitats should not be seen in isolation from the networks that link them. Giving sites and networks two separate policies fails to make explicit the absolute link that must be made between them. Making our proposed changes to Policies 30 and 31 would encompass that holistic approach, meet the Lawton Review’s principles (quoted in para 5.27) of ‘bigger, better, more and joined’ habitats and of the Government’s 2018 25-year Environment Plan’s proposals for Nature Recovery Network, and the NPPF paras 170(d) and 174, which consistently puts habitats and networks together. Policy 31 is weak and does not comply with NPPF paras 175-176. PROPOSED CHANGE Policy 30 Ecological Networks should be part of Policy 31 Valuing Biodiversity and Geodiversity, creating one coherent policy. Delete Policy 30 and revise Policy 31 as follows.

Summary: DELETE - REPEAT

Response: Noted however it is not considered necessary to combine the policies. An additional sentence has been added to bullet point C to reiterate the importance of the ecological network with respect to SSSI’s. Some of the proposed changes duplicate the NPPF policy and advice is that Local Plans should not simply repeat the guidance in the NPPF.
A2 We are encouraged to see the inclusion of 10% net gain for both designated and non-designated sites and the associated explanation in 10.40. We are also encouraged by the statement within 10.40 that 'surveys will be requested in line with British Standard' and are encouraged to see the request for buffers around local sites. However, we feel this is contradictory to Policy 7 which cannot achieve these basic targets under current circumstances.

Response:
Comment noted. See response to policy 7. The Local Plan is required to balance economic, environmental and social aspects of the NPPF.
Comment:
This comment is about bringing geoconservation into focus alongside bioconservation, and not a serious suggestion that the document is fundamentally unsound. SAGT made response to the Draft Local Plan in October 2018, specifically regarding Policies 31, 63 and 64. We note in the Local Plan Publication version published in August 2019 that the following underlined suggestion relating to Policy 31, section A, sub paragraphs A-1 and A-2 has not been included. (underline cannot be shown so shown as CAPITAL instead) ‘the mitigation hierarchy appears to apply just to biodiversity sites and we suggest that geological sites be specifically included. IN SITUATIONS WHERE PROPOSALS MAY CAUSE HARM TO A GEOLOGICAL SITE (WHICH OFTEN MEANS DESTRUCTION OF THE SITE), MIGHT IT BE POSSIBLE TO STIPULATE THAT SUCH A PROPOSAL WILL ONLY BE SUPPORTED IF A SCHEME TO RECORD SCIENTIFIC INFORMATION FROM THE SITE PRIOR TO ITS PERMANENT LOSS IS INCLUDED.’ However, we were pleased to note that the A-6 sub paragraph has been added: 'Where the permanent loss of a bioconservation or geoconservation site occurs, a proposal will be supported only if provision is made for the site to be recorded by a suitably qualified expert'. Our reasons for suggesting the above and wish for both to be included are based on our experience that it is particularly beneficial for sites that have been inaccessible for a long time, either because they are located on private land or they have become enveloped by creeping soil and dense vegetation. With very little effort on the part of a developer, geological outcrops can be quickly exposed and cleaned with an excavator, allowing geoscientists an opportunity to make a site visit and take photographs, measurements and samples.

Summary:
Policy 31 A-1 and A-2. Not added previous suggestion, which states? "In situations where proposals may cause harm to a geological site (which often means destruction of the site), might it be possible to stipulate that such a proposal will only be supported if a scheme to record scientific information from the site prior to its permanent loss is included." Pleased to see suggested amendment (at previous consultation stage) added to Policy 31 section A6

Response:
Comments noted. Policy 31 A6 covers the recording of a geological site at risk by permanent loss
### Tests of Soundness:

- [ ]
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### Comment:

It is recommended that more detail is provided on the application of net gain and how it will achieve a measurable net gain. The policy could do with some rewording to make it clear on what is expected for different development types. If the LPA propose to take a biodiversity net gain approach for all major development and proposals that are likely to result in a biodiversity effect, it needs to be clear on what criteria will be used to judge the need for measurable net gain, i.e. how will likely biodiversity effects be determined and if a developer mitigates effects through design of the proposal how will this be taken into account. Further detail in the supporting text relating to the mitigation hierarchy would be beneficial to ensure clarity that biodiversity net gain complements the hierarchy and all developments should seek to avoid impacts before considering mitigation and finally compensation. As outlined in Planning Practice biodiversity net gain does not override the protection for designated sites, protected or priority species and irreplaceable or priority habitats set out in the NPPF. The policy will need to ensure that habitat improvement will be a genuine additional benefit, and go further than measures already required to implement a compensation strategy.

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### Response:

Noted. Additional text has been added to the supporting text of the policy and it is intended to prepare further information supplementary to the Local Plan about the Council’s requirements for delivering net gain.
Comment Ref: C/Policy 31/04288/1/012

Name: Turley

CUSREF: 04288

Date: 30/09/2019
Organisation: Turley

Representing: Peel Land and Property Management Limited

Test of Soundness:

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Comment:

8.1 Peel has a number of comments on the LP’s other strategic and non-strategic policies as currently drafted. These are summarised below: 8.8 The draft policy states that proposals which may harm designated or non-designated sites or features of biodiversity interest will only be supported if (amongst other things) the proposals will deliver a 10% net gain for biodiversity. 8.9 The current NPPF requires local planning authorities to ‘pursue opportunities’ for securing measurable net gains for biodiversity. While the Spring Statement announced that the Government will be mandating net gains in the Environment Bill, detailed legislation will be required deliver 10% net gains in biodiversity. This legislation has still be developed and enacted - through the Environment Bill - and the Government has set a transition period of two years relating to biodiversity net gain requirements. This uncertainty needs to be recognised in policy and its explanation. 8.10 To be consistent with the NPPF, a policy amendment is required to provide flexibility in circumstances where a minimum 10% net gain in biodiversity cannot be achieved, or where addressing other ecological considerations (such as enhancing ecological connectivity by extending/improving movement corridors) means it is preferable not to achieve such a net gain.

Summary:

The current NPPF requires LPAs to ‘pursue opportunities’ for securing measurable net gains for biodiversity. The Spring Statement announced that the government will be mandating net gains in the Environment Bill, but detailed legislation will be required for 10% net gain. This has not been developed or enacted and the government has set a transition period of two years relating to biodiversity net gain requirements. This uncertainty should be recognised in policy and explanation. To be consistent with the NPPF, a policy amendment is required to provide flexibility in circumstances where a minimum 10% net gain in biodiversity cannot be achieved, or where addressing other ecological considerations means it is preferable not to achieve such gain.

Response:

Comments noted. The policy was drafted at a time when the direction of the government with respect to net gain the use of biodiversity metrics was clear. As it stands currently the NPPF requires development to deliver a net gain in biodiversity. The policy provides clarity for developers by specifying the use of the latest Defra Metric and for developments to deliver 10% net gain in biodiversity in order to satisfy the requirement in the NPPF for net gain. It is intended to prepare further information supplementary to the Local Plan about the Council’s requirements for delivering net gain.
Comment Ref: C/Policy 31/04371/1/002
Name: Mineral Products Association
Organisation: Mineral Products Association
Date: 26/09/2019
Representing:

| Test of Soundness: | Unsound - not stated |

Comment:
This policy as drafted fails to properly reflect NPPF (para 171) in that it does not properly distinguish between the hierarchy of international, national and locally designated sites in terms of development management. Policy needs redrafting to make it sound.

Summary:
Policy 31. Does not properly distinguish between the hierarchy of international, national and locally designated sites in terms of development and needs redrafting.

Response:
Comment noted. Disagree with the comment, policy 31 as drafted distinguishes between the different levels of protected site and applies appropriate DM criteria for each level.
UKOOG Response: Under the UK regulation oil and gas developments for the extraction of shale gas with the use of hydraulic fracturing is prohibited from Sites of Special Scientific Interest (SSSI), Areas of Outstanding Natural Beauty (AONB) and National Parks, other onshore oil and gas development proposals should be considered on a case by case basis, which aligns with the NPPF, Planning Practice Guidance and the WMS 2018.

Summary:
Policy 31. Comment? Hydraulic fracturing is prohibited from SSSI, AONB and national parks

Response:
Comment noted. Proposals will be considered on a case by case basis. The council's shale gas and hydraulic fracturing web page also shows information on the 2015 Infrastructure Act which includes listing the safeguards associated with the act.
I would be willing to appear at the Examination if that would assist the Independent Planning Inspector. Please also do let me know if you have any queries.

National planning policies and legislation protect international sites, such as Thorne and Hatfield Moors Special Area of Conservation and Special Protection Area, and Doncaster’s 15 Sites of Special Scientific Interest. Comment: Being directly adjacent to one of the SSSIs, the Site should be designated part of the LNR/SSSI to help protect and develop the ecological environment within Doncaster.

Response:

Noted. Comments refer to a site proposed for development rather than the specifics of the policy.
Tests of Soundness:

Comment:
IGas supports the intentions of the respective policies. Oil and gas development for the extraction of shale gas using hydraulic fracturing is prohibited from Sites of Special Scientific Interest (SSSI), Areas of Outstanding Natural Beauty (AONB) and National Parks; other onshore oil and gas development proposals should be considered on a case by case basis, which aligns with the NPPF, Planning Practice Guidance and the WMS 2018. It is important to recognise that mineral operations including onshore oil and gas sites are temporary in nature and provide a clear opportunity, post decommissioning, for sites to be restored to an enhanced environmental condition, for example; a site can be redeveloped to maximise habitat potential and improve biodiversity, which should be considered when assessing a planning application. It should also be recognised that onshore oil and gas developments for exploration and appraisal developments are very short in duration and small in footprint compared to aggregate mineral extraction operations which often occur over extended time periods and over much bigger areas. If onshore oil and gas operations extend into production, the land use footprint is still very small. Consequently, net gain may not be necessary or appropriate in all cases and particularly at the exploration and appraisal stages. This can be assessed on a case by case basis.

Summary:
Policy 30 and 31. Supports intentions of policies. But, should recognise the temporary nature of minerals and sites can be redeveloped to maximise habitats and biodiversity. Net gain may not be necessary or appropriate at hydrocarbon exploration and appraisal phases.

Response:
Comment noted. The local plan should be read as a whole. See Local Plan paragraph 14.33, which covers temporary nature of mineral workings.
Comment:

4.1 This section of the report provides comments on a limited number of wider thematic policies detailed within the Doncaster Local Plan 2015-2035: Publication Version (June 2019). Green Infrastructure 4.2 Policy 31 deals with the protection of designated sites and species. As drafted this policy is not considered to accord with national planning policy and other relevant environmental legislation. 4.3 In particular, the DEFRA biodiversity metric and associated requirement for a minimum net gain in biodiversity referred to in part A point 2 of this policy has not yet been incorporated into draft legislation, and it cannot be assumed that this will become law. Furthermore, relevant legislation could be subject to further changes. It is therefore necessary to ensure that the wording of policy 31 reflects whatever legal standard is ultimately adopted. 4.4 A number of amendments to Part A of this policy are therefore proposed in order to make the policy sound as set out below. A) Proposals which may harm designated Local Wildlife Sites, Local Geological Sites, Priority Habitats, Priority Species, protected species (as defined)* will only be supported where: 1. the mitigation hierarchy is applied so that firstly harm is avoided wherever possible, then appropriate mitigation is provided to lessen the impact of any unavoidable harm, and as a last resort compensation is delivered to offset any residual damage to biodiversity; 2. unless otherwise agreed, a biodiversity net gain calculation demonstrates that a proposal will deliver a net gain for biodiversity consistent with relevant legislative requirements; 3. where necessary they protect, restore, enhance and provide appropriate buffers around wildlife and geological features and aim to link these to the wider ecological network; 4. where necessary they produce and deliver appropriate long term management plans for local wildlife and geological sites as well as newly created or restored habitats; 5. they can demonstrate that the need for a proposal outweighs the value of any features to be lost; and 6. if the permanent loss of a geological site is unavoidable, then provision will be made for the site to first be recorded by a suitably qualified expert. * Protected species are defined at those listed under Schedule 5 and 8 of the Wildlife and Countryside Act 1981 and Schedule 2, 3 and 4 of the Conservation of Habitats And Species Regulations 2017. 4.5 As drafted, Part B of the policy does not correctly reflect the Habitats Regulations and should be amended to read as follows: B) Proposals which may impact Special Areas of Conservation, Special Protection Areas or RAMSAR Sites will only be supported where it can be demonstrated that there will be no likely significant effects or no adverse effects on the integrity of European sites. Where the integrity of a site is affected development will not be permitted unless there are alternative solutions and “imperative reasons of overriding public interest” (IROPI) and compensation measures are secured as defined under the Habitats Directives. 4.6 Part D of Policy 31 effectively duplicates the requirement to assess impacts on functionally linked land under the Habitats Regulations. As such this part of the policy is unnecessary and should be deleted. 4.7 Should this part of the policy be retained, as drafted it does not accurately reflect the Habitats Regulations and could be read as protecting all habitats (including hedgerows, scrub, grassland, ditches and ponds) irrespective of whether nightjar are present on sites within 3km of the special Protection Area (SPA). The policy and supporting text needs to make clear that such habitats are only protected if they are actually used by nightjar in order to be consistent with the Habitats Regulations. If this part of the policy is not deleted as suggested, the following amendments to the text are required: In order to ensure development does not negatively impact on nightjar populations, proposals located within 3km of Thorne and Hatfield Moors Special Protection Area that adversely impact habitats that nightjars use for feeding on, will only be supported where they deliver a net impact in nightjar foraging habitat. 4.8 Whilst minor, the above amendments are recommended in order to ensure that the policy is positively prepared, effective, justified and consistent with national planning policy and other relevant habitats legislation, and can therefore be considered sound.

Summary:

Comments on other policies within the Local Plan  Policy 31 - Green Infrastructure The policy does not accord with national policy or other relevant environmental legislation. The DEFRA biodiversity metric and associated requirement for a minimum net gain in biodiversity referred to in Part A point 2 has not yet been incorporated into draft legislation. Cannot assume that this will become law. Further legislation could be subject to further changes. Policy 31 should reflect whatever legal standard is ultimately adopted. The following amendments are proposed to Policy 31: 1. the mitigation hierarchy is applied so that firstly harm is avoided wherever possible, then appropriate mitigation is provided to lessen the impact of any unavoidable harm, and as a last resort compensation is delivered to offset any residual damage to biodiversity; 2. unless otherwise agreed, a biodiversity net gain calculation demonstrates that a proposal will deliver a net gain for biodiversity consistent with relevant legislative requirements; 3. where necessary they protect, restore, enhance and provide appropriate buffers around wildlife and geological features and aim to link these to the wider ecological network; 4. where necessary they produce and deliver appropriate long term management plans for local wildlife and geological sites as well as newly created or restored habitats; 5. they can demonstrate that the need for a proposal outweighs the value of any features to be lost; and 6. if the permanent loss of a geological site is unavoidable, then provision will be made for the site to first be recorded by a suitably qualified expert. * Protected species are defined at those listed under Schedule 5 and 8 of the Wildlife and Countryside Act 1981 and Schedule 2, 3 and 4 of the Conservation of Habitats And Species Regulations 2017. Part B of the policy does not correctly reflect the Habitats Regulations and should be amended as follows: B) Proposals which may impact Special Areas of Conservation, Special Protection Areas or RAMSAR Sites will only be supported where it can be demonstrated that there will be no likely significant effects or no
adverse effects on the integrity of European sites. Where the integrity of a site is affected development will not be permitted unless there are no alternative solutions and "imperative reasons of overriding public interest" (IROPI) and compensation measures are secured as defined under the Habitats Directives. Part D of the policy duplicates the requirement to assess impacts on functionally linked land under the Habitats Regulations. Part D is unnecessary and should be deleted. 4.7 Should this part of the policy be retained, as drafted it does not accurately reflect the Habitats Regulations and could be read as protecting all habitats (including hedgerows, scrub, grassland, ditches and ponds) irrespective of whether nightjar are present on sites within 3km of the Special Protection Area (SPA). The policy and supporting text needs to make clear that such habitats are only protected if they are actually used by nightjar in order to be consistent with the Habitats Regulations. If this part of the policy is not deleted as suggested, the following amendments to the text are required: In order to ensure development does not negatively impact on nightjar populations, proposals located within 3km of Thorne and Hatfield Moors Special Protection Area that adversely impact habitats that nightjars use for feeding on, will only be supported where they deliver a net gain in nightjar foraging habitat. 4.8 Whilst minor, the above amendments are recommended in order to ensure that the policy is positively prepared, effective, justified and consistent with national planning policy and other relevant habitats legislation, and can therefore be considered sound.

Response:

Comments noted. The policy was drafted at a time when the direction of the government with respect to net gain the use of biodiversity metrics was clear. As it stands currently the NPPF requires development to deliver a net gain in biodiversity. The policy provides clarity for developers by specifying the use of the latest Defra Metric and for developments to deliver 10% net gain in biodiversity in order to satisfy the requirement in the NPPF for net gain. Disagree that Point D should be deleted/amended. Surveys to demonstrate presence of nightjar on a site are extremely difficult to undertake in a manner that provides reliable evidence or presence/absence. Nightjar will use a variety of sites for foraging and surveys only provide a snapshot of usage in time. The NPPF requires development to deliver a net gain in biodiversity and by specifying the need to ensure that developments within 3km of Thorne and Hatfield Moors SPA deliver a net gain in habitats that nightjar will use for foraging we are ensuring that the interests of the SPA are protected.
**Comment Ref:** C/Policy 32/01747/2/004  
**Attend Examination:** Written Representation

**Reason:**

**Area:** Chapter 10: Green Infrastructure

**Policy:** Policy 32: Local Wildlife & Geological Sites

**Tests of Soundness:**

**Comment:**

We would like to commend Policy 32 for the consideration given to Local sites.

**Summary:**

commends Policy 32 for the consideration given to Local sites

**Response:**

Comment noted and thank you
A pleasant and attractive environment including woodlands, trees, shrubs and other green assets contributes to maintaining and improving the quality of life for people living and working in Doncaster and is significant in helping to attract new investment into the Borough. The evaluation of these existing assets is an important part of the design process for development proposals. Retaining positive green infrastructure assets wherever possible ensures the environment is not damaged and that these assets are available for the benefit of future generations. This is particularly important for woodlands, especially ancient woodlands which have an unbroken history of tree cover and are uniquely valuable and irreplaceable habitats, with no effective form of compensation for their loss or deterioration. Comment: Development of the Site will lead to destruction of a pleasant and attractive environment and positive infrastructure assets. The environment will be damaged and the impact will be irreparable and unable to be compensated for. The site is now a regenerating woodland and should be protected as being valuable an irreplaceable. As noted above, there is no effective form of compensation for the loss of the Site should it be developed.

Summary:
Site Ref 350/407 - Rosehill - Development of the Site will lead to destruction of a pleasant and attractive environment and positive infrastructure assets. The environment will be damaged and the impact will be irreparable and unable to be compensated for. The site is now a regenerating woodland and should be protected as being valuable an irreplaceable. There is no effective form of compensation for the loss of the Site should it be developed.

Response:
Comment noted. The site (350/407) is identified as a housing sites not green space or green infrastructure (GI). Housing sites have developer requirements which will provide GI assets as part of the proposal. Comments refer to a site proposed for development rather than the specifics of the policy.
Comment Ref: /Policy 33/05059/1/014

Attend Examination: Attend Hearing

Reason: I would be willing to appear at the Examination if that would assist the Independent Planning Inspector. Please also do let me know if you have any queries.

Area: Chapter 10: Green Infrastructure

Policy: Policy 33: Woodlands, Trees & Hedgerows

Tests of Soundness: Justified Consistent with national

Comment:

Proposals will be supported where it can be demonstrated that woodlands, trees and hedgerows have been adequately considered during the design process, so that a significant adverse impact upon public amenity or ecological interest has been avoided. There will be presumption against development that results in the loss or deterioration of ancient woodland and/or veteran trees. Proposals will need to include: A) the submission of survey information of woodland, trees and hedgerows, as appropriate, to a recognised professional and fit for purpose standard which is able to demonstrate evaluation of these features for realistic long-term retention, and how this has positively informed the design process; B) demonstration of how retained features are to be protected during development; C) an adequate landscape buffer (which excludes built development and residential gardens) adjacent to existing woodlands, wildlife sites and at settlement edges; D) sufficient provision of appropriate replacement planting where it is intended to remove trees and hedgerows; and E) avoidance of the loss or deterioration of woodland. Comment: As noted earlier, the site is a diverse natural environment including scrubland, mature and younger trees, flowers and grasses, and bounded in parts by hedgerows, and supports a diverse array of flora and fauna, many of which are under threat and have declining habitats in the Doncaster area. Development of the site will be contrary to Policy 33 as it will result in significant adverse impact upon public amenity and ecological interest. Development will be unable to provide an adequate landscape buffer. In particular, development of the Site will not be able to provide sufficient provision of appropriate replacement planting to compensate for the removal of trees and hedgerows. Development of the Site will result in the loss or deterioration of the regenerating woodland developing on the Site. Further development adjoining a woodland LNR/SSSI will inevitably create pressures on this area and lead in time to its loss or deterioration.

Summary:

Site Ref 350/407 - Rosehill - The site is a diverse natural environment including scrubland, mature and younger trees, flowers and grasses, and bounded in parts by hedgerows, and supports a diverse array of flora and fauna, many of which are under threat and have declining habitats in the Doncaster area. Development of the site will be contrary to Policy 33 as it will result in significant adverse impact upon public amenity and ecological interest. Development will be unable to provide an adequate landscape buffer. In particular, development of the Site will not be able to provide sufficient provision of appropriate replacement planting to compensate for the removal of trees and hedgerows. Development of the Site will result in the loss or deterioration of the regenerating woodland developing on the Site. Further development adjoining a woodland LNR/SSSI will inevitably create pressures on this area and lead in time to its loss or deterioration.

Response:

Comment noted. The site (350/407) is identified as a housing sites not green space or green infrastructure (GI). Housing sites have developer requirements which will provide GI assets as part of the proposal. Comments refer to a site proposed for development rather than the specifics of the policy. The assessment of the site for suitability as a housing site includes assessment criteria relating to trees and woodlands. Council officers will consult on planning applications and ensure any valuable assets are retained.
Comment Ref: C/Policy 34/0009/1/001
Name: East Riding Of Yorkshire Council
Date: 25/09/2019
Organisation: East Riding of Yorkshire Council
Representing: 

Comment Ref: C/Policy 34/0009/1/001
Attend Examination: Not Stated
Reason: 
Area: Chapter 10: Green Infrastructure
Policy: Policy 34: Landscape

Tests of Soundness:

Comment:
East riding welcomes the added reference to the Throne and Hatfield Moors to policy 34 in response to our earlier comments on the draft policies consultation.

Summary:
Policy 34. Welcomes reference to Thorne and Hatfield Moors.

Response:
Comment noted.
Comment:

Doncaster’s landscapes are an important element of its distinctive character and make an important contribution to the setting of its settlements. We support this Policy which will help to ensure that development proposals conserve and enhance the Borough’s landscapes.

Response:

Support welcomed
A substantial revision of this policy is required in order to give landscape the importance it requires as the setting for all development and to reflect the European Landscape Convention. At present the explanatory text focuses only on policy not the importance of landscape to people and place. Landscape is more than just scenery: it is the interaction between people and place; the bedrock upon which our society is built. Landscape gives meaning and value to the world around us, contributing to our sense of identity and quality of life. Landscape is both rural and urban, and includes both beautiful and everyday places, as well as those in need of restoration. Through it all ecosystem services are delivered. Landscape makes connections between people and places, and between society and its environment. Involving all of society in shaping and celebrating our landscape will address many challenges facing us today, including demographic and lifestyle changes, food and energy security, heritage and biodiversity conservation. The European Landscape Convention was the world’s first treaty to focus specifically on landscape and was ratified by the UK Government in 2007. Its commitments include integrating landscape into all relevant policies in spatial planning; identifying, assessing and monitoring landscapes, describing their character and analysing what contributes to, or detracts from, their quality and distinctiveness; involving all members of society in the protection, management and planning of landscapes: safeguarding their heritage value, enabling positive change and looking ahead to adapt and create the landscapes of the future.

The European Landscape Convention was the world’s first treaty to focus specifically on landscape and was ratified by the UK Government in 2007. Its commitments include integrating landscape into all relevant policies in spatial planning; identifying, assessing and monitoring landscapes, describing their character and analysing what contributes to, or detracts from, their quality and distinctiveness; involving all members of society in the protection, management and planning of landscapes: safeguarding their heritage value, enabling positive change and looking ahead to adapt and create the landscapes of the future. NPPF paras 20(d), 127(c), 141, 149, 151, 170 (a & b), 171, and 180(b) require stronger protection of landscape and tranquil areas than the current policy. REP PROPOSED CHANGE A substantial revision of policy 34: All development should conserve the landscape character and quality of the Borough and should where possible, enhance and effectively manage the historic, natural and man-made landscape features that contribute to local distinctiveness of both rural and urban landscapes. This will require a landscape scale approach to the proposed development, with associated policy requirements. 1. Understanding of the context, characteristics and significance of the development should be provided and informed by the Doncaster Landscape Character Assessment. 2. Development will be expected to: i. Incorporate appropriate landscaping which reflects the character of the area, including its historical, biodiversity and cultural character, and tranquillity through appropriate design and management; ii. Where appropriate, provide suitable and appropriate mitigation for the restoration of damaged landscape areas; iii. conserve the distinctive setting of, and relationship between, settlements and buildings and the landscape including important views; iv. Preserve and promote local distinctiveness and diversity; v. Avoid the loss of habitats of significant landscape importance and the pattern of woodland, forests, trees, field boundaries, vegetation and other features; where suitable mitigation measures are not achievable on site, then development should provide appropriate net biodiversity gain off site; vi. Protect and / or conserve the historical and ecological qualities of an area, and the special qualities of rivers, waterways, wetlands and their surroundings; and vii Protect the topography of the area including sensitive skylines, hillsides and geological features. viii Protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; ix Consider cumulative impacts on landscape and visual amenity; x Where development proposals would result in a significant impact on the Borough’s landscape, consider alternative site selection; the scale, massing, design, form, layout, orientation and / or operation of the development; and the incorporation of suitable mitigation measures. 3. Where development is considered to be acceptable in principle, measures will be sought to integrate it into the landscape character of the area by: i. Protecting, restoring and enhancing the character and appearance of the local area through suitable planting, landscape and / or woodland; ii. Making suitable provision for better public access to, and enjoyment of, local landscapes; Landscape works shall be appropriate to the scale of the development in accordance with Policy 49 (Landscaping of New Developments) and may require consideration at a landscape scale. The explanation below the policy also requires amending with the following paras before para 10.50: Landscape is more than just scenery: it is the interaction between people and place; the bedrock upon which our society is built. Landscape is both rural and urban, and includes both beautiful and everyday places, as well as those in need of restoration. Involving all of society in shaping and celebrating our landscape will address many challenges facing us today, including climate change, demographic and lifestyle changes, food and energy security, heritage and biodiversity conservation. The European Landscape Convention was the world’s first treaty to focus specifically on landscape and was ratified by the UK Government in 2007. Its commitments include integrating landscape into all relevant policies in spatial planning; identifying, assessing and monitoring landscapes, describing their character and analysing what contributes to, or detracts from, their quality and distinctiveness; involving all members of society in the protection, management and planning of landscapes: safeguarding their heritage value, enabling positive change and looking ahead to adapt and create the landscapes of the future.
Summary:
This policy should be substantially revised to give landscape the importance it requires as the setting for all development and to reflect the European Landscape Convention. The explanatory text focuses only on policy not the importance of landscape to people and place. Landscape is more than scenery - it is the interaction between people and place. NPPF paras 20(d), 127(c), 141, 149, 151, 170 (a & b), 171, and 180(b) require stronger protection of landscape and tranquil areas than the current policy. Proposed change: A substantial revision of policy 34: All development should conserve the landscape character and quality of the Borough and should where possible, enhance and effectively manage the historic, natural and man-made landscape features that contribute to local distinctiveness of both rural and urban landscapes. This will require a landscape scale approach to the proposed development, with associated policy requirements. 1. Understanding of the context, characteristics and significance of the development should be provided and informed by the Doncaster Landscape Character Assessment. 2. Development will be expected to: i. Incorporate appropriate landscaping which reflects the character of the area, including its historical, biodiversity and cultural character, and tranquility through appropriate design and management; ii. Where appropriate, provide suitable and appropriate mitigation for the restoration of damaged landscape areas; iii. conserve the distinctive setting of, and relationship between, settlements and buildings and the landscape including important views; iv. Preserve and promote local distinctiveness and diversity; v. Avoid the loss of habitats of significant landscape importance and the pattern of woodland, forests, trees, field boundaries, vegetation and other features; where suitable mitigation measures are not achievable on site, then development should provide appropriate net biodiversity gain off site; vi. Protect and / or conserve the historical and ecological qualities of an area, and the special qualities of rivers, waterways, wetlands and their surroundings; and vii Protect the topography of the area including sensitive skylines, hillsides and geological features. viii Protect tranquil areas which have remained relatively undisturbed by noise and are priced for their recreational and amenity value for this reason; ix Consider cumulative impacts on landscape and visual amenity; x Where development proposals would result in a significant impact on the Borough's landscape, consider alternative site selection; the scale, massing, design, form, layout, orientation and / or operation of the development; and the incorporation of suitable mitigation measures. 3. Where development is considered to be acceptable in principle, measures will be sought to integrate it into the landscape character of the area by: i. Protecting, restoring and enhancing the character and appearance of the local area through suitable plantings, landscape and / or woodland; ii. Making suitable provision for better public access to, and enjoyment of, local landscapes; Landscape works shall be appropriate to the scale of the development in accordance with Policy 49 (Landscaping of New Developments) and may require consideration at a landscape scale. The explanation below the policy also requires amending with the following paras before para 10.50: Landscape is more than just scenery: it is the interaction between people and place; the bedrock upon which our society is built. Landscape is both rural and urban, and includes both beautiful and everyday places, as well as those in need of restoration. Involving all of society in shaping and celebrating our landscape will address many challenges facing us today, including climate change, demographic and lifestyle changes, food and energy security, heritage and biodiversity conservation. The European Landscape Convention was the world's first treaty to focus specifically on landscape and was ratified by the UK Government in 2007. Its commitments include integrating landscape into all relevant policies in spatial planning; identifying, assessing and monitoring landscapes, describing their character and analysing what contributes to, or detracts from, their quality and distinctiveness; involving all members of society in the protection, management and planning of landscapes: safeguarding their heritage value, enabling positive change and looking ahead to adapt and create the landscapes of the future.

Response:
It is considered that the existing Policy is consistent with the NPPF references quoted by CPRE. One change to refer to cumulative impact is considered a helpful addition to the Policy paragraph preceding Part F. NPPF para 20d - is covered by opening para to Policy which refers to both conservation and enhancement. NPPF para 127c - Part A refers to landscape character and setting. NPPF para 141 - The Local Plan defers Green Belt policy to the NPPF. NPPF para 149 - climate change is referred to in the policy supporting text in para 10.54 first bullet point. NPPF para 151 - consideration of landscape impact of renewable and low carbon is included in Policy 59, Part B5. NPPF para 170a&b - 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. 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). Policy 34 applies to both Doncaster’s Countryside and Green Belt whereas NPPF Para 170b relates only to Countryside. NPPF para 171 - 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. This Policy can seek contributions to landscapes that operate at a catchment or landscape scale. Policy 49 (Landscaping of New Developments) also requires considerations of Green Infrastructure. NPPF para 180 - it is acknowledged a change to refer to cumulative impact would benefit the policy and this is suggested as a possible Proposed Modification. In terms of tranquillity .... criterion A of the Policy requires consideration of tranquility as does Criterion A4 of Policy 27 (Green Infrastructure). More generally the impact of noise pollution is addressed by Policy 55 / Appendix 11.
Comment: We continue to welcome the reference in part D) with regards to the special qualities of rivers, waterways and their surroundings; which has been carried forward from the Draft Local Plan. This should help ensure that development positively addresses the waterway network in Doncaster; and should make the Local Plan more effective in meeting the aims of Policy 27.

Summary: We continue to welcome the reference in part D) with regards to the special qualities of rivers, waterways and their surroundings; which has been carried forward from the Draft Local Plan. This should help ensure that development positively addresses the waterway network in Doncaster; and should make the Local Plan more effective in meeting the aims of Policy 27.

Response: Support noted.
Comment Ref: C/Policy 34/05014/1/008

Name: United Kingdom Onshore Oil And Gas

Organisation: United Kingdom Onshore Oil and Gas

Date: 30/09/2019

Reason: Tests of Soundness:

Summary: Policy 34. Comment? Oil and gas production sites are screened by trees or natural features. Restoration takes place in line with planning conditions taking account of landscape character.

Response: Comment noted. Screening and restoration conditions will determined using local policies.
Comment:

Onshore oil and gas developments have operated safely within sensitive environments for many years. It is important to recognise that minerals can only be worked where they occur. If necessary, exploration and appraisal sites can be temporarily screened and production sites could be screened by trees or other natural features and designed in a way to minimise any adverse impacts on the character and distinctiveness of the landscape. Once a site is decommissioned, the land can be restored in-line with planning conditions and any environment consenting requirements, taking full account of landscape character.

Summary:

Policy 34. Should recognise minerals can only be worked where they are found and mineral sites can be screened and restored in line with planning conditions which take note of landscape character.

Response:

Comment noted. The local plan should be read as a whole. With regard to planning applications appropriate conditions (such as those related to screening and landscape character) will be applied using the policies in the plan. Paragraph 14.33 also covers temporary nature of mineral workings.
We support the suite of non-Strategic Policies which amplify the Strategic Policy for the historic environment (Policy 35). These Policies cover areas about which either the NPPF is largely silent or are needed to address local circumstances of the Plan area. Taken as a whole, these Policies provide clear guidance about how decision makers should react to development proposals affecting the historic environment [NPPF Paragraph 16(d)]. In conjunction with the Core Strategy Policy 35, these Policies help to satisfy the requirement in Paragraph 185 of the NPPF that the Local Plan should set out a “positive strategy for the conservation and enjoyment of the historic environment”.

Response:
Support welcomed. Representation’s reference to ‘Core Strategy Policy 35’ should read ‘Local Plan Policy 35’
We support this Strategic Policy for the historic environment. We particularly endorse Criterion A which will help decision makers understand which elements of Doncaster’s historic environment are of especial importance to the distinct character of the Borough (and, as a result, which might warrant greater consideration in determining the appropriateness of development proposals) and will assist those preparing any subsequent Neighbourhood Plans. We also welcome the clearly-stated support for proposals which will improve accessibility and enjoyment of the key historic visitor sites within the plan area.

Summary: 'Sound'. We support this Strategic Policy for the historic environment. We particularly endorse Criterion A which will help decision makers understand which elements of Doncaster’s historic environment are of especial importance to the distinct character of the Borough (and, as a result, which might warrant greater consideration in determining the appropriateness of development proposals) and will assist those preparing any subsequent Neighbourhood Plans. We also welcome the clearly-stated support for proposals which will improve accessibility and enjoyment of the key historic visitor sites within the plan area.

Response: Support welcomed
We support this Policy which sets out clearly the information that will be required to support development proposals affecting Doncaster’s heritage assets. This will assist in the delivery of the Plan’s objectives regarding the protection and enhancement of the historic environment.

**Tests of Soundness:**

- [ ]
- [ ]
- [ ]

**Comment:**

We support this Policy which sets out clearly the information that will be required to support development proposals affecting Doncaster’s heritage assets. This will assist in the delivery of the Plan’s objectives regarding the protection and enhancement of the historic environment.

**Response:**

Support welcomed
Comment needs rewording to properly reflect NPPF (para 189) to make the policy sound as follows:

Proposals that affect known or potential heritage assets will require:

A) The provision of a heritage statement (or its equivalent) with a level of detail proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance that includes:

1. sufficient information to gain an understanding of the potential impact that the proposals will have on the significance of any heritage assets or historic environment likely to be affected; and
2. for heritage sites with archaeological interest, at least a desk-based assessment and, where appropriate, the results of a field evaluation.

B) In the exceptional circumstances where harm could be justified, detailed investigation and recording will be required to an agreed standard in advance of any alteration, demolition or groundwork to ensure that an understanding of the affected heritage asset is gained, and that knowledge is widely publicised.

Summary:

Policy 36. A) The provision of a heritage statement (or its equivalent) with a level of detail proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance that includes:

Response:

Comment noted. No proposed change. Appropriate wording contained within explanatory text. And local plan policy not required to repeat NPPF wording.
Comment: We support this Policy which sets out clearly the approach that will be taken to development proposals involving the alteration or extension to Doncaster's listed buildings. This will assist in the delivery of the Plan's objectives regarding the protection and enhancement of the historic environment.

Summary: 'Sound'. We support this Policy which sets out clearly the approach that will be taken to development proposals involving the alteration or extension to Doncaster's listed buildings. This will assist in the delivery of the Plan's objectives regarding the protection and enhancement of the historic environment.

Response: Support welcomed
Comment: We support this Policy which sets out clearly the approach that will be taken to development proposals likely to affect Doncaster’s Conservation Areas. This will assist in the delivery of the Plan’s objectives regarding the protection and enhancement of the historic environment.

Summary: 'Sound'. We support this Policy which sets out clearly the approach that will be taken to development proposals likely to affect Doncaster’s Conservation Areas. This will assist in the delivery of the Plan’s objectives regarding the protection and enhancement of the historic environment.

Response: Support welcomed
**Comment Ref:** C/Policy 38/04706/1/009  
**Name:** Savills  
** Organisation:** Savills  
**Representing:** Warde-Aldam Estates

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**Date:** 27/09/2019

**Reason:** We wish to discuss with the Inspector and Council our concerns regarding the Open Space allocation at Warmsworth. There is detailed evidence which will need to be discussed orally.

**Area:** Chapter 11: The Historic Environment

**Policy:** Policy 38: Conservation Areas

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**Comment:**

Whilst it is important to set out a positive strategy for the conservation and enhancement of the historic environment across the whole of the Borough, the historic environment should not preclude future development in appropriate villages. For example, conservation areas should not preclude development but, ensure that special care is taken when considering any future proposal / design, that the new development is built to a high standard and, where possible, seek to preserve and / or enhance the significance of the associated heritage asset. As long as it is acknowledged that the historic environment should not preclude future development we have no further comments to make in respect of Policy 38.

**Summary:**

Whilst it is important to set out a positive strategy for the conservation and enhancement of the historic environment across the whole of the Borough, it should be acknowledged that the historic environment should not preclude future development in appropriate villages. For example, conservation areas should not preclude development but, ensure that special care is taken when considering any future proposal / design, that the new development is built to a high standard and, where possible, seek to preserve and / or enhance the significance of the associated heritage asset.

**Response:**

Policy 38 on conservation areas does not state that new development is precluded but that proposals should take heritage significance into account and amplifies the NPPF by outlining the criteria by which such proposals would be assessed. Whether this precludes any development on a particular site or part of a conservation area would depend very much on the extent of harm to its heritage significance, how this is mitigated, and whether the extent of public benefits outweighs this harm (which is in line with the NPPF). The policy states that proposals that can be shown to enhance the character and appearance of a conservation area would be supported (with particular reference to local distinctiveness cross-referenced to policies 35 and 42).
Comment Ref: C/Policy 38/04707/1/009

Reason: We wish to discuss with the Inspector and Council our concerns regarding the Open Space allocation at Warmsworth. There is detailed evidence which will need to be discussed orally.

Area: Chapter 11: The Historic Environment

Policy: Policy 38: Conservation Areas

Tests of Soundness: Positively prepared
                Justified
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**Comment Ref:** C/Policy 38/04708/1/009  
**Attend Examination:** Attend Hearing  
**Reason:** We wish to discuss with the Inspector and Council our concerns regarding the Open Space allocation at Warmsworth. There is detailed evidence which will need to be discussed orally.  
**Area:** Chapter 11: The Historic Environment  
**Policy:** Policy 38: Conservation Areas

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**Comment:** We support this Policy which sets out clearly the approach that will be taken to development proposals likely to affect Doncaster’s Historic Parks and Gardens. This will assist in the delivery of the Plan’s objectives regarding the protection and enhancement of the historic environment. We particularly welcome the identification of Parks and Gardens of Local Interest and commend the approach and the detailed analysis which has gone into identifying the landscapes on the local list. This will help to ensure that these important elements of Doncaster’s character are appropriately conserved.

**Summary:** 'Sound'. We support this Policy which sets out clearly the approach that will be taken to development proposals likely to affect Doncaster’s Historic Parks and Gardens. This will assist in the delivery of the Plan’s objectives regarding the protection and enhancement of the historic environment. We particularly welcome the identification of Parks and Gardens of Local Interest and commend the approach and the detailed analysis which has gone into identifying the landscapes on the local list. This will help to ensure that these important elements of Doncaster’s character are appropriately conserved.

**Response:** Support welcomed
Designation of Local Historic Interest and the designations do not match historical connections. The evidence base and policy approach therefore need to be thoroughly reviewed. At Cusworth Hall the boundary of the Local Historic Interest expands beyond the Registered Park and Garden to land which is not associated with Cusworth Hall. It is clear from early historic Ordnance Survey maps and earlier cartographic sources that the proposed area of Local Historic Interest sits immediately outside the north eastern extent of the formal parkland of Cusworth Hall. Currently this area has a clear agricultural use with no formal historical connection to the parkland other than the western edge which follows the boundary of part of the Registered Historic Park and Garden. The area therefore has no Local Historic Interest other than a limited visual connection which can be managed through other policies in the plan. The area of Local Historic Interest should therefore be reviewed.

The Plan is its present form is not justified and is not consistent with national policy. It is considered that the Plan could fail to deliver sustainable development in accordance with the policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. However, we consider that with increased the suggested amendments to the extent of the Cusworth Hall parks and Gardens of Local Historic Interest the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change

To overcome the objection and address soundness matters, the Council should:
- Amend Cusworth Hall Local Historic Interest to remove the north eastern field.

The NPPF expects that local authorities set out a positive strategy for the conservation and enjoyment of the historic environment. As part of a positive strategy we have identified undesignated heritage assets such as parks and gardens of local historic interest (with a commitment to identify buildings and structures of local interest as well). The evidence base for this was then subject to public consultation. The representation does not appear to challenge the principle, that as part of plan making, the local authority has the right to identify undesignated heritage assets and support with policies for their protection. Rather, the representation refutes the identification of one particular site as having local historic interest as an extension of a national designation.
| CUSREF: 05209 | Name: Spawforths |
| Date: 30/09/2019 | Organisation: Spawforths |
| Representing: Avant Homes Ltd |

| Comment Ref: C/Policy 39/05209/1/012 |
| Attend Examination: Attend Hearing |

**Reason:**

**Area:** Chapter 11: The Historic Environment

**Policy:** Policy 39: Historic Parks & Gardens

**Tests of Soundness:**
- Positively prepared
- Effective
- Justified
- Consistent with national

**Comment:**

11.1. Avant Homes objects to Policy 39 and its accompanying evidence base. Test of Soundness 11.2. Avant Homes considers that the Local Plan is currently unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 11.3. Avant Homes is concerned with the designation of sites of Local Historic Interest and that the designations do not match the historical connections. The evidence base and the policy approach therefore need to be thoroughly reviewed. 11.4. At Cusworth Hall the boundary of the Local Historic Interest expands beyond the Registered Park and Garden to land which is not associated with Cusworth Hall. It is clear from early historic Ordnance Survey maps and earlier cartographic sources that the proposed area of Local Historic Interest sits immediately outside the north eastern extent of the formal parkland of Cusworth Hall. Currently this area has a clear agricultural use with no formal historical connection to the parkland other than the western edge which follows the boundary of part of the Registered Historic Park and Garden. 11.5. The area therefore has no Local Historic Interest other than a limited visual connection which can be managed through other policies in the plan. The area of Local Historic Interest should therefore be reviewed. 11.6. The Plan is its present form is not justified and is not consistent with national policy. It is considered that the Plan could fail to deliver sustainable development in accordance with the policies in the Framework. 11.7. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 11.8. However, we consider that with increased the suggested amendments to the extent of the Cusworth Hall parks and Gardens of Local Historic Interest the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 11.9. To overcome the objection and address soundness matters, the Council should: - Amend Cusworth Hall Local Historic Interest to remove the north eastern field.

**Summary:**

Designation of Local Historic Interest and the designations do not match historical connections. The evidence base and policy need to be thoroughly reviewed. At Cusworth Hall the boundary of the Local Historic Interest expands beyond the Registered Park and Garden to land which is not associated with Cusworth Hall. It is clear from early historic Ordnance Survey maps and earlier cartographic sources that the proposed area of Local Historic Interest sits immediately outside the north eastern extent of the formal parkland of Cusworth Hall. Currently this area has a clear agricultural use with no formal historical connection to the parkland other than the western edge which follows the boundary of part of the Registered Historic Park and Garden. The area therefore has no Local Historic Interest other than a limited visual connection which can be managed through other policies in the plan. The area of Local Historic Interest should therefore be reviewed. The plan is not justified and not consistent with national policy. The plan could fail to deliver sustainable development. Do not consider the Local Plan to be sound. Proposed change: Amend Cusworth Hall Local Historic Interest to remove the north eastern field.

**Response:**

The NPPF expects that local authorities set out a positive strategy for the conservation and enjoyment of the historic environment. As part of a positive strategy we have identified undesignated heritage assets such as parks and gardens of local historic interest (with a commitment to identify buildings and structures of local interest as well). The evidence base for this was then subject to public consultation. The representation does not appear to challenge the principle, that as part of plan making, the local authority has the right to identify undesignated heritage assets and support with policies for their protection. Rather, the representation refutes the identification of one particular site as having local historic interest as an extension of a national designation.
**Comment Ref:** C/Policy 39/05210/1/012

**Name:** Spawforths

**Organisation:** Spawforths

**Representing:** Avant Homes Ltd

**Reason:**

**Area:** Chapter 11: The Historic Environment

**Policy:** Policy 39: Historic Parks & Gardens

**Tests of Soundness:**

- Positively prepared
- Effective
- Justified
- Consistent with national

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**Summary:**

Designation of Local Historic Interest and the designations do not match historical connections. The evidence base and policy need to be thoroughly reviewed. At Cusworth Hall the boundary of the Local Historic Interest expands beyond the Registered Park and Garden to land which is not associated with Cusworth Hall. It is clear from early historic Ordnance Survey maps and earlier cartographic sources that the proposed area of Local Historic Interest sits immediately outside the north eastern extent of the formal parkland of Cusworth Hall. Currently this area has a clear agricultural use with no formal historical connection to the parkland other than the western edge which follows the boundary of part of the Registered Historic Park and Garden. The area therefore has no Local Historic Interest other than a limited visual connection which can be managed through other policies in the plan. The area of Local Historic Interest should therefore be reviewed. The plan is not justified and not consistent with national policy. The plan could fail to deliver sustainable development. Do not consider the Local Plan to be sound. Proposed change: Amend Cusworth Hall Local Historic Interest to remove the north eastern field.

**Response:**

The NPPF expects that local authorities set out a positive strategy for the conservation and enjoyment of the historic environment. As part of a positive strategy we have identified undesigned heritage assets such as parks and gardens of local historic interest (with a commitment to identify buildings and structures of local interest as well). The evidence base for this was then subject to public consultation. The representation does not appear to challenge the principle, that as part of plan making, the local authority has the right to identify undesigned heritage assets and support with policies for their protection. Rather, the representation refutes the identification of one particular site as having local historic interest as an extension of a national designation.
Policy 39 'Historic Parks and Gardens' sets out that development affecting Historic Parks and Gardens will be assessed against the following principles: a) Development proposals within, or affecting Doncaster’s nationally registered parks and gardens, and parks and gardens of local historic interest should preserve and, where appropriate, enhance the heritage significance of these parks and gardens. b) Proposals affecting a historic park of local or national significance should not result in harm to the built or landscape features or key views or vistas which contribute to the significance of the historic park or garden, or which might prejudice future restoration. c) Where proposals result in harm or substantial harm to the significance of a nationally designated historic park the proposal will be considered in relation to the extent of harm arising from the proposal, the relative significance of the historic park and garden, and any public benefits arising from the proposal. In the case of parks and gardens of local interest a balanced judgement will be taken weighing the scale of any harm against the significance of the park. DLP query the need of Policy 39 given the protection to Heritage Assets set out in the National Planning Policy Framework. In respect of the proposed Special Policy Area of Major Developed Site in the Green Belt, any future development proposals for the site will be sensitively designed in respect to the sites setting within High Melton Park and the High Melton Conservation Area. As part of any future planning application an assessment will be made of the developments impact on the significance of these heritage assets. Recommendation It is recommended that Policy 39 is removed from the Draft Local Plan.

Summary:
Policy 39 - Historic Parks and Gardens'. o This Policy should be removed. o Query the need for this policy given the protection of heritage assets in the NPPF.

Response:
The NPPF expects that local authorities set out a positive strategy for the conservation and enjoyment of the historic environment. As part of our positive strategy we have identified undesignated heritage assets such as parks and gardens of local historic interest (with a commitment to identify buildings and structures of local interest as well). The evidence base for this was then subject to public consultation. We are also proposing policies for their conservation. Policy 39 covers parks and gardens of both local and of national significance but (in line with the NPPF) differentiates how they are to be treated according to their heritage significance. It amplifies policy where the NPPF is silent and is part of our positive strategy so we see no reason to withdraw Policy 39. The study we undertook recommended that the parkland of High Melton Hall had sufficient heritage interest in its own right to be considered a historic park and garden of local interest. Its boundary is not contiguous with the boundary of the conservation area but it will make some contribution to its character and appearance as well as the setting of the listed High Melton Hall. Any future planning application would be expected to consider all aspects of heritage significance of which the character of the historic park and garden is one aspect. Green Belt designation is unrelated to these heritage designations and not all parks and gardens are within the Green Belt. We do not accept the argument that the whole of Policy 39 should be removed on the grounds of this element of the objection which appears to be site specific.
Comment: We support this Policy which sets out clearly the approach that will be taken to development proposals likely to affect the archaeology of the Borough. This will assist in the delivery of the Plan's objectives regarding the protection and enhancement of the historic environment.

Summary: 'Sound'. We support this Policy which sets out clearly the approach that will be taken to development proposals likely to affect the archaeology of the Borough. This will assist in the delivery of the Plan’s objectives regarding the protection and enhancement of the historic environment.

Response: Support welcomed
We support this Policy which sets out clearly the approach that will be taken to development proposals likely to affect buildings or structures of local interest. This will assist in the delivery of the Plan’s objectives regarding the protection and enhancement of the historic environment.
Comment:
Unsound because measures to incorporate low and zero-carbon design into buildings and places are not integrated or strategic. The urgent need to embrace zero carbon as a feature of all new developments is not reflected in this chapter. The references to it in Clause 11 of Policies 43 and 45, and Policy 47(B) sit in some isolation from each other, and are treated as development management policies, whereas the role of design and placemaking in addressing climate change should in fact be a major strategic feature of the Plan if it is to be achieved. Proposed change: Adding an overall 'design and placemaking for climate change response' strategic policy, which refers to policies 42, 43, 45, 46, 47 as implementation policies, but also includes the importance of other characteristics, such as walkability, street trees, densities and mix of uses, and public transport connectivity, as crucial aspects of design and placemaking.

Summary:
Unsound as measures to incorporate low and zero-carbon design into buildings and places are not integrated or strategic. The urgent need to embrace zero carbon as a feature of all new developments is not reflected here. The references to it in Clause 11 of Policies 43 and 45, and Policy 47(B) sit in some isolation from each other, and are treated as development management policies, whereas the role of design and place making in addressing climate change should in fact be a major strategic feature of the Plan if it is to be achieved. Proposed change: Adding an overall 'design and place making for climate change response' strategic policy, which refers to policies 42, 43, 45, 46, 47 as implementation policies, but also includes the importance of other characteristics, such as walkability, street trees, densities and mix of uses, and public transport connectivity, as crucial aspects of design and place making.

Response:
The place making aspects of climate change and low carbon design are a theme throughout the policies of the Local Plan and are picked up in numerous strategic and DM policies in addition to those that have been identified. It was considered this was a better way of covering such issues instead of having another standalone policy which would repeat topics covered under relevant other policies.
**Comment Ref:** S/Policy 42/0016/28/029  
**Attend Examination:** Not Stated  
**Name:** Historic England  
**Organisation:** Historic England  
**CUSREF:** 0016  
**Date:** 04/09/2019  
**Representing:** Historic England

### Tests of Soundness

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### Area

Chapter 12: Design & the Built Environment

### Policy

Policy 42: Character & Local Distinctiveness

### Reason

We support this Policy especially the requirement that development should reinforce the character of local landscapes and building traditions, be of a high quality design that contributes to local distinctiveness, respond positively to their context, setting and existing site features, and integrate visually and functionally with the immediate and surrounding area. We particularly welcome the requirement that proposals will need to demonstrate an understanding of the context, history, character and appearance of the site, neighbourhood and the wider area to inform the appropriate design approach. This will help to deliver the Plan’s Objectives regarding quality of place.

### Summary

'Sound'. We support this Policy especially the requirement that development should reinforce the character of local landscapes and building traditions, be of a high quality design that contributes to local distinctiveness, respond positively to their context, setting and existing site features, and integrate visually and functionally with the immediate and surrounding area. We particularly welcome the requirement that proposals will need to demonstrate an understanding of the context, history, character and appearance of the site, neighbourhood and the wider area to inform the appropriate design approach. This will help to deliver the Plan’s Objectives regarding quality of place.

### Response

Support welcomed
We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Persimmon Homes provides high-quality family housing products which are known to be popular in the local market. Our range of products includes a wide-variety of architectural features and local character can be responded to with the use of these house types and their positioning within and design of the overall layout of a scheme, including character areas. Part B of this policy seeks to impose strict requirements on national house builders to justify the use of house types which have been used before or to adapt house types to complement or re-interpret local character. This policy has not been justified and it does not provide an appropriate strategy. The requirement for major urban extensions, high profile and prominent developments to provide or make a contribution towards permanent public art is not compliant with national policy. Paragraph 56 of the Framework outlines the tests which planning obligations must meet and they must be necessary to make a development acceptable in planning terms and directly related to the development. Neither of these points apply to large residential development schemes.

Policy 42 attempts to encourage developers to propose homes which are suited to local character or develop new distinctive developments with strong identity suited to the local area. Persimmon's representation suggests they have products which are capable of being adapted to suit local character which is what the policy is trying to achieve. Part B is not considered to be a strict requirement, but reflects good practice in terms of contextual analysis and developing a design response suited to the local area. P.15 of the National Design Guide reflects this approach. NPPF para 127 c states Planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities). The LP objectives include seeking to ensure our towns, suburbs, villages and countryside benefit from high quality appropriate development that reinforces distinctive and vibrant places. Public art is considered an important element to achieve this. The Council has an emerging public art strategy, and policy 42 is designed to help implement these aspirations. Many of the sites identified in the policy are Council owned and the requirement will apply equally to public sector led developments. We are successfully incorporating public art into the design of a number of public and private developments with no significant adverse effect on development viability. NPPF para 125. States that plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. The policy aims to achieve this.
### Tests of Soundness

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### Comment:

2.42 Part b) of the policy states 'Where an applicant wishes to utilise standardised, or 'off the shelf' designs which have been used previously, unless these designs are rigorously justified under the requirements of part E of this policy, the designs must be adapted to complement or re-interpret local character, or make them more distinctive by developing an appropriate locally inspired new identity and appearance for the development ’ 2.43 Whilst the wording of part b) has changed slightly the restrictive still results in a negative presumption towards the use of major housebuilders standard house types. This is unfair and is not based on any evidence which justifies its inclusion within the policy; for these reasons our Client objects to this part of the policy. 2.44 It is however accepted that in some cases revisions may be required to the detailing of certain house types, however, the policy enables the Council free reign to request revisions to house types. 2.45 Our Client will also identify the most appropriately designed houses for each location to ensure that the character and appearance of the area is maintained and not adversely affected. Part b) of the policy is not effective, justified, positively planned or in accordance with national planning policy and is therefore unsound and should be deleted.

### Summary:

Policy 42 - Character and Local Distinctiveness  Part b)  1. Objects to this part of the Policy. 2. Has a negative presumption towards the use of standard house types. This is unfair and is not based on any evidence which justifies its inclusion within the policy  3. It is not sound and does not accord with national planning policy.

### Response:

Policy 42 attempts to encourage developers to propose homes which are suited to local character or develop new distinctive developments with strong identity suited to the local area. The representation suggests their clients have products which are capable of being adapted to suit local character which is what the policy is trying to achieve. Part B provides flexibility for the applicants to justify the use of a standard house type which have been used previously, but places the emphasis upon them to show this is the case with reference to the local area by undertaking a robust contextual analysis as is good practice urban design. Part B is not considered to be unfair or a strict requirement, but reflects good practice in terms of contextual analysis and developing a design response suited to the local area. P.15 of the National Design Guide reflects this approach. NPPF para 127 c states Planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities). NPPF para 125. States that plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. The policy aims to achieve this.
Comment: 2.42 Part b) of the policy states ‘Where an applicant wishes to utilise standardised, or ‘off the shelf’ designs which have been used previously, unless these designs are rigorously justified under the requirements of part E of this policy, the designs must be adapted to complement or re-interpret local character, or make them more distinctive by developing an appropriate locally inspired new identity and appearance for the development ’ 2.43 Whilst the wording of part b) has changed slightly the restrictive still results in a negative presumption towards the use of major housebuilders standard house types. This is unfair and is not based on any evidence which justifies its inclusion within the policy; for these reasons our Client objects to this part of the policy. 2.44 It is however accepted that in some cases revisions may be required to the detailing of certain house types, however, the policy enables the Council free reign to request revisions to house types. 2.45 Our Client will also identify the most appropriately designed houses for each location to ensure that the character and appearance of the area is maintained and not adversely affected. Part b) of the policy is not effective, justified, positively planned or in accordance with national planning policy and is therefore unsound and should be deleted.

Summary: Policy 42 - Character and Local Distinctiveness  Part b)  1. Objects to this part of the Policy. 2. Has a negative presumption towards the use of standard house types. This is unfair and is not based on any evidence which justifies its inclusion within the policy  3. It is not sound and does not accord with national policy.

Response: Policy 42 attempts to encourage developers to propose homes which are suited to local character or develop new distinctive developments with strong identity suited to the local area. The representation suggests their clients have products which are capable of being adapted to suit local character which is what the policy is trying to achieve. Part B provides flexibility for the applicants to justify the use of a standard house type which have been used previously, but places the emphasis upon them to show this is the case with reference to the local area by undertaking a robust contextual analysis as is good practice urban design. Part B is not considered to be unfair or a strict requirement, but reflects good practice in terms of contextual analysis and developing a design response suited to the local area. P.15 of the National Design Guide reflects this approach. NPPF para 127 c states Planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities). NPPF para 125. States that plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. The policy aims to achieve this.
1.1. Avant Homes is concerned with aspects of Policy 42 therefore consider that the Policy 42 unsound. Test of Soundness  
1.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about?  
X - Positively Prepared  
X - Effective  
X - Justified  
X - Consistency with National Policy  
Justification  
11.3. Avant Homes support the principles of Policy 42, however are concerned with aspects which require the adaptation of standard house types to complement or reinterpret the local character.  
11.4. This could impact on viability and therefore the deliverability of schemes. It is not clear how the whole plan viability has taken into account the requirement for high quality design. Avant Homes consider this requirement will inevitably lead to increases in professional fees and build costs, associated with use of high quality materials. Avant Homes consider additional sensitivity testing is required to consider the impacts this policy.  
11.5. The requirement is not justified and does not provide an appropriate strategy. The Plan is its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy.  
11.6. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound.  
11.7. However, we consider that with increased flexibility and review of the viability evidence the Local Plan can be found sound. The Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan.  
Proposed Change  
11.8. To overcome the objection and address soundness matters, the Council should: - Test the impact of the policy on viability, and revise the policy to reflect the findings.  

Summary:  
Policy 42 - Local Character and Distinctiveness.  
1. Could impact of deliverability and viability of schemes.  
2. Impact of policy should be tested on viability and revised to reflect the findings.  

Response:  
Support for the principles of policy 42 is noted. No robust evidence has been presented to the Council to support the assertions made in this representation in terms of negative impacts on viability and deliverability. The representation only raises 'concerns' suggests policy 42 'could' impact on viability. High quality design is clearly an objective of National Planning Policy (NPPF para 124) and should therefore be factored into any development appraisal. It is not considered the requirements of policy 42 will have significantly adverse impacts on development viability. It does not necessarily follow that policy 42 will require the use of high quality materials in every case. Whilst professional fees may increase slightly in some instances, as the design team may need to re-design external elevations to be more suited to local areas, these professional fees will be marginal overall and will not result in significant viability implications. If it were to be the case that this policy (alone or in combination with other requirements) was having a significant adverse impact on viability it would be considered under policy 67 with the applicants given the opportunity to demonstrate why this is the case.
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Comment Ref: C/Policy 42/05289/1/012

Attend Examination: Attend Hearing

Reason: We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Area: Chapter 12: Design & the Built Environment

Policy: Policy 42: Character & Local Distinctiveness

Tests of Soundness: Justified Consistent with national

Comment:

Persimmon Homes provides high-quality family housing products which are known to be popular in the local market. Our range of products includes a wide-variety of architectural features and local character can be responded to with the use of these house types and their positioning within and design of the overall layout of a scheme, including character areas. Part B of this policy seeks to impose strict requirements on national house builders to justify the use of house types which have been used before or to adapt house types to complement or re-interpret local character. This policy has not been justified and it does not provide an appropriate strategy. The requirement for major urban extensions, high profile and prominent developments to provide or make a contribution towards permanent public art is not compliant with national policy. Paragraph 56 of the Framework outlines the tests which planning obligations must meet and they must be necessary to make a development acceptable in planning terms and directly related to the development. Neither of these points apply to large residential development schemes.

Summary:

Part B of Policy 42 seeks to impose strict requirements on national house builders to justify the use of house types which have been used before or to adapt house types to complement or re-interpret local character. This policy has not been justified and it does not provide an appropriate strategy. The requirement for major urban extensions, high profile and prominent developments to provide or make a contribution towards permanent public art is not compliant with national policy. Paragraph 56 of the Framework outlines the tests which planning obligations must meet and they must be necessary to make a development acceptable in planning terms and directly related to the development. Neither of these points apply to large residential development schemes.

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Policy 42 attempts to encourage developers to propose homes which are suited to local character or develop new distinctive developments with strong identity suited to the local area. Persimmon’s representation suggests they have products which are capable of being adapted to suit local character which is what the policy is trying to achieve. Part B is not considered to be a strict requirement, but reflects good practice in terms of contextual analysis and developing a design response suited to the local area. P.15 of the National Design Guide reflects this approach. NPPF para 127 states Planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities). The LP objectives include seeking to ensure our towns, suburbs, villages and countryside benefit from high quality appropriate development that reinforces distinctive and vibrant places. Public art is considered an important element to achieve this. The Council has an emerging public art strategy, and policy 42 is designed to help implement these aspirations. Many of the sites identified in the policy are Council owned and the requirement will apply equally to public sector led developments. We are successfully incorporating public art into the design of a number of public and private developments with no significant adverse effect on development viability. NPPF para 125. States that plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. The policy aims to achieve this.
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Area: Chapter 12: Design & the Built Environment

Policy: Policy 42: Character & Local Distinctiveness

Tests of Soundness:

Justified Consistent with national

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**Comment Ref:** S/Policy 43/0016/28/030  
**Name:** Historic England  
**Organisation:** Historic England  
**Date:** 04/09/2019

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**Comment:**

We support this Policy. This will help to deliver the Plan’s Objectives regarding quality of place.

**Summary:**

'Sound'. We support this Policy. This will help to deliver the Plan’s Objectives regarding quality of place.

**Response:**

Support welcomed
Whilst Gladman recognise the importance of high-quality design, planning policies and the documents sitting behind them should not be overly prescriptive and need flexibility in order for schemes to respond to site specifics and the character of the local area. There will not be a 'one size fits all' solution in relation to design and sites should be considered on a site-by-site basis with consideration given to various design principles. Gladman therefore suggest that more flexibility is provided in the policy wording to ensure that a high quality and inclusive design is not compromised by aesthetic requirements alone. We consider that to do so could act to impact on the viability of proposed residential developments. We suggest that regard should be had to paragraph 126 of the Framework which states that: “To provide maximum clarity about design expectations at an early stage, plans or supplementary planning documents should use visual tools such as design guides and codes. These provide a framework for creating distinctive places, with a consistent and high quality standard of design. However their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified.”.

Response:
Agree. The policy sets out accepted objectives and principles of good urban design as a flexible framework in acknowledgement that policies should not be overly prescriptive. It is considered the policy is flexible enough whilst being clear in what it is trying to achieve. It does not solely focus on aesthetic considerations, many of the principles incorporate functional considerations such as safety, legibility, adaptability and integration. The policy also seeks to set out a process which reflects good practice. Part B specifically states this. In these respects the policy is considered flexible enough to cover different types of development and the wide ranging contexts found within the borough, it is in keeping with para 126 of the NPPF.
Name: Persimmon Homes (Yorkshire) Ltd
Organisation: Persimmon Homes (Yorkshire) Ltd

Comment Ref: C/Policy 43/03431/1/013
Attend Examination: Attend Hearing
Reason: We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Area: Chapter 12: Design & the Built Environment
Policy: Policy 43: Good Urban Design

Tests of Soundness:

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The requirement of this policy for proposals of 10 residential units or more to make use of the design review process should not be a requirement, but instead should be encouraged. A mandatory requirement for design review could adversely impact on site delivery and a flexible policy approach should be taken. As it stands, this policy is not effectively justified and does not provide an appropriate strategy. This policy should be modified to 'encourage' the use of design review rather than require it.

Summary:
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Response:
The policy does not make design review mandatory. The first para of policy 43 states that 'Proposals for new development will be expected to follow a best practice inclusive design process and where appropriate use established design tools to support good urban design'. It goes on to say this should make use of design review. It does not state that it must. Likewise para 12.10 states 'we encourage applicants to seek design advice and independent design review prior to submission of an application' and under the bullet points 'independent design review where appropriate'. 

Page 832
Tests of Soundness:

Comment:

2.46 Our Client is generally supportive of policies 43 and 45, which seek to ensure that high quality designs and development is brought forward. 2.47 However, the policies should include a caveat which states that the provisions within the policy are subject to viability.

Summary:

Policy 43 - Good Urban Design & Policy 45 - Residential Design  1. Generally supportive of Policy. 2. However, should include a caveat which states that the provisions within the policy are subject to viability.

Response:

Support noted. However it is not considered a viability caveat is required as any development proposal would also be assessed against policy 67. Para 1.14 is clear that all policies should be read together and that individual policies do not necessarily refer to other relevant policies. If it were to be the case that this design policy (alone or in combination with other requirements) was having a significant adverse impact on viability it would be considered under policy 67 with the applicants given the opportunity to demonstrate why this is the case.
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12.1. Avant Homes is concerned with aspects of Policy 42 therefore consider that the Policy 43 unsound. Test of Soundness 12.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 12.3. Avant Homes support the principles of Policy 43, however are concerned with aspects of the policy which expects the use of established design tools. For major applications of over 0.5 hectares or 10 or more residential units this, is stated "this should include making use of pre-application engagement with the Council and affected community, and utilising design review". 12.4. There are some internal inconsistencies within the policy and explanatory text. The explanatory text in paragraph 12.10 indicates that the use design advice and design review are encouraged. The policy should be revised to provide certainty for developers, applicants and the community. 12.5. A requirement for design review could impact on timescales and the deliverability of schemes. Avant Homes consider that the policy should be flexible and should "encourage" the use of design review rather than "expect" or "require", and reflect the wording within the explanatory text to provide greater clarity. 12.6. The requirement is not justified and does not provide an appropriate strategy. The Plan is its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 12.7. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 12.8. However, we consider that with increased flexibility the Local Plan can be found sound. The Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 12.9. To overcome the objection and address soundness matters, the Council should: - Modify the policy wording to reflect the explanatory text in paragraph 12.10 to provide greater consistency and clarity and "encourage" rather than expect the use of design review.

Summary:
Policy 43 - Good Urban Design. 1. Support principles of the policy. 2. A requirement for a Design Review could impact on timescales and the deliverability of schemes. 3. Policy should be more flexible to 'encourage' rather than 'expect' or 'require'. 4. Suggest Policy is re-worded to reflect explanatory text in para 12.0. 5. Requirement of a Design review is not justified.

Response:
The policy does not make design review mandatory. The first para of policy 43 states that 'Proposals for new development will be expected to follow a best practice inclusive design process and where appropriate use established design tools to support good urban design'. It goes on to say this should make use of design review. It does not state that it must. Likewise para 12.10 states 'we encourage applicants to seek design advice and independent design review prior to submission of an application' and under the bullet points 'independent design review where appropriate'.
| CUSREF: | 05216 |
| Name: | Spawforths |
| Date: | 30/09/2019 |
| Organisation: | Spawforths |
| Representing: | Metroland |

**Comment Ref:** C/Policy 43/05216/1/012

**Attend Examination:** Attend Hearing

**Reason:**

**Area:** Chapter 12: Design & the Built Environment

**Policy:** Policy 43: Good Urban Design

**Tests of Soundness:**
- Positively prepared
- Effective
- Justified
- Consistent with national

**Comment:**

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The requirement of Policy 43 for proposals of 10 residential units or more to make use of the design review process should not be a requirement, but instead should be encouraged. A mandatory requirement for design review could adversely impact on site delivery and a flexible policy approach should be taken. As it stands, this policy is not effectively justified and does not provide an appropriate strategy. This policy should be modified to 'encourage' the use of design review rather than require it.

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Tests of Soundness:

Comment:

We support this Policy especially the requirements that:- - There is to be an exceptional standard of design quality for buildings, spaces and environmental improvements at higher-profile gateway locations. - Important views, panoramas and vistas are to be protected and enhanced, particularly where these may be affected by a taller building. Developments should not create a crowding effect around, obstruct, or appear too close, dominant or high in relation to any significant heritage asset, particularly Doncaster Minster. - New development at the edge of a settlement should visually and physically integrate with the existing settlement, be sensitive to adjacent uses, should protect the character of the wider landscape and enhance views from sensitive locations such as heritage assets. This Policy will help to deliver the Plan's Objectives regarding quality of place.

Summary:

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Response:

Support welcomed
Policy 44 states that important views, panoramas and vistas are to be protected and enhanced. Gladman note that the Policy does not identify which views, panoramas and vistas are to be protected and enhanced. For the purposes of clarity and consistency in decision making, we consider it essential that potential views for protection and enhancement are clearly identified and set out. Gladman submit that new development can often be located appropriately without eroding the landscape and locally important views. Proposals can be sensitively designed to take into consideration the wider landscape features of a surrounding area to provide new vistas and views. In addition, as set out in case law, an important view that should be protected must have some form of additional quality that would ‘take it out of the ordinary’ rather than views which may not have any landscape significance and are based solely on community support. To be valued, a view would need to have some form of physical attribute, especially since opinions on landscape are highly subjective. Therefore, without the proportionate and robust evidence required by the PPG to demonstrate why these views and landscape areas are considered special, Gladman fail to see how Policy 44 meets the requirements set out in the Framework. Gladman therefore suggest this element of the policy is deleted as it does not provide clarity and support for a decision maker to apply the policy predictably and with confidence. It is therefore contrary to paragraph 16(d) of the Framework.

The explanatory text at 12.13 sets out the key strategic views. These are not identified as protected views. It is not considered that every view e.g. views in Conservation Areas need to be set out in the Local Plan when the importance of these are more clearly explained within Conservation area appraisals. Agree that development can often be located and designed without causing unacceptable harm and can be sensitively designed to take into consideration local issues and create new views. That is why the Local Plan policies advocate a contextual design approach in other LP policies and at 12.14. The policy wording under 44a and 12.13 allows for enhancement, not just protection for the sake of it, and in this sense allows scope for new development where it is sensitive to the characteristics of the key view.
We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

The important views outlined in Policy 44 B and expanded upon within the explanatory text (12.13) are not supported by proportionate evidence. The Landscape Character Assessment is outdated and cannot be relied upon to provide robust details of important views within the district. In addition no evidence is provided for the need for the strict requirements on edge of settlement locations. The policy is therefore not justified.

The views are not derived from the Landscape Character Assessment. The key views are not ‘protected views’ under policy 43. The policy wording under 44a, 44c and 12.13 allows for enhancement, not just protection for the sake of it, and in this sense allows scope for new development where it is sensitive to the characteristics of the key view. Development can often be located and designed without causing unacceptable harm and can be sensitively designed to take into consideration local issues and create new views. That is why the Local Plan policies advocate a contextual design approach in other LP policies and at 12.14. It is not considered that the design requirements for edge of settlement locations are strict. The policy reflects existing UDP policies and seeks to draw attention to a specific important design issue and set out key considerations. If the design process advocated under policies 42-43 are undertaken properly as is good practice (see National Design Guide) the contextual analysis will identify the most appropriate design response to the settlement edge.
**Reason:** We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

**Tests of Soundness:**

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**Summary:**

The important views outlined in Policy 44 B and expanded upon within the explanatory text (12.13) are not supported by proportionate evidence. The Landscape Character Assessment is outdated and cannot be relied upon to provide robust details of important views within the District. In addition no evidence is provided for the need for the strict requirements on edge of settlement locations. The policy is therefore not justified.

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**Comment Ref:** C/Policy 45/03431/1/015

**Name:** Persimmon Homes (Yorkshire) Ltd

**Date:** 26/09/2019

**Organisation:** Persimmon Homes (Yorkshire) Ltd

**Representing:**

**Comment Ref:**

**Attend Examination:** Attend Hearing

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**Area:** Chapter 12: Design & the Built Environment

**Policy:** Policy 45: Residential Design

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**Response:**

At this stage it is unclear as to whether the Space Standards Policy will be found sound. If it is, we are happy to delete the reference under policy 45. If it is not, then we would suggest it remains under policy 45 as a key design consideration for new homes.
Comment: 2.46 Our Client is generally supportive of policies 43 and 45, which seek to ensure that high quality designs and development is brought forward. 2.47 However, the policies should include a caveat which states that the provisions within the policy are subject to viability.

Summary: Policy 45 1. Generally supportive of Policy. 2. However, should include a caveat which states that the provisions within the policy are subject to viability.

Response: Support noted. However it is not considered a viability caveat is required as any development proposal would also be assessed against policy 67. Para 1.14 is clear that all policies should be read together and that individual policies do not necessarily refer to other relevant policies. If it were to be the case that this design policy (alone or in combination with other requirements) was having a significant adverse impact on viability it would be considered under policy 67 with the applicants given the opportunity to demonstrate why this is the case.
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Response:
Support noted. However it is not considered a viability caveat is required as any development proposal would also be assessed against policy 67. Para 1.14 is clear that all policies should be read together and that individual policies do not necessarily refer to other relevant policies. If it were to be the case that this design policy (alone or in combination with other requirements) was having a significant adverse impact on viability it would be considered under policy 67 with the applicants given the opportunity to demonstrate why this is the case.
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Area: Chapter 12: Design & the Built Environment

Policy: Policy 45: Residential Design

Tests of Soundness:

Comment:
This policy seeks a requirement for 'adequate internal living space'. It is unclear as to what constitutes adequate space, however, as the Council is seeking to introduce space standards it is requested that part B.5. is removed from this policy to avoid unnecessary duplication. Our comments on the Council's proposed introduction of space standards are set out below.

Summary:
Policy 45 Part B(5) seeks a requirement for 'adequate internal living space'. It is unclear as to what constitutes adequate space, however, as the Council is seeking to introduce space standards it is requested that part B.5. is removed from this policy to avoid unnecessary duplication.

Response:
At this stage it is unclear as to whether the Space Standards Policy will be found sound. If it is, we are happy to delete the reference under policy 45. If it is not, then we would suggest it remains under policy 45 as a key design consideration for new homes.
We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

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At this stage it is unclear as to whether the Space Standards Policy will be found sound. If it is, we are happy to delete the reference under policy 45. If it is not, then we would suggest it remains under policy 45 as a key design consideration for new homes.
Comment:
The majority of the Doncaster area is served by Yorkshire Water and Severn Trent Water. Anglian Water is the sewerage undertaker for part of Doncaster Borough only (parishes of Auckley, Austerfield, Blaxton and Finningley) within and close to Doncaster Sheffield Airport. We are also the water undertaker for part of Finningley Parish. The following comments are submitted on behalf of Anglian Water and relate to our company area only. Anglian Water in our previous comments had asked Doncaster Council to consider including a policy which requires the optional higher water efficiency standard for residential developments (110 litres per person, per day). To assist the preparation of Local Plans, Anglian Water and the Environment Agency have produced this joint advice note relating to optional water efficiency standard. We consider that there is sufficient evidence to demonstrate a need for the optional higher water efficiency standard in the Anglian Water company area. We also consider the adoption of this standard will not raise any financial viability issues for Local Plans or individual development proposals. PROPOSED CHANGE It is therefore proposed that the following wording or similar be added to Policy 46 ‘New housing proposals should meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day as set out in building regulations part G2’.

Summary:
Policy 46 should be amended to require the optional higher water efficiency standard for residential developments (110 litres per person, per day) by addition of the following wording or similar : ‘New housing proposals should meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day as set out in building regulations part G2’.

Response:
No substantive evidence has been found, or provided to the Council, demonstrating a need for the optional water standards in the Anglian Water area or within the wide Borough. Anglian Water only serves a small part of the Borough for sewerage on the south eastern extreme of the Borough boundary. Clean water is provided by Yorkshire Water and Severn Trent, neither of which have raised water availability as an issue and therefore this optional requirement has not been viability tested. The government commissioned Water stressed areas - final Classification, July 2013, Developed by the Environment Agency and Natural Resources Wales does highlight Anglian Water as having a higher propensity for water stress, but both other utility suppliers in the vast majority of the Doncaster area are identified as having moderate stress which is categorised as not serious.
To allow for greater discussion of the industry concerns and to address any points that arise during the examination.

Policy 46: Housing Design Standards

The Home Builders Federation

The evidence does not demonstrate this need. The Housing Design Standards Policy Evidence Paper (June 2019) surveyed 246 homes across 47 sites, to determine how many met the NDSS. It is not apparent if these sites had been submitted after the Government introduction of the NDSS, but it seems unlikely that it would have been in place at the time many of the applications were submitted. The Council indicate that through their research they have identified that a number of properties have not been built to the NDSS. They state that ‘201 out of the 246 plans assessed met the gross internal floor area based on their proposed number of bedrooms’ and that ‘plans were more likely to fail against the NDSS based on storage space or bedroom size, highlighting an internal design issue as opposed to dwelling plot size’. The Council also suggest that the NDSS would be beneficial in providing ventilation, reducing under-occupancy and over-crowding. However, the evidence provided is limited in terms of numbers of properties considered and the potential market comparisons made. It is not evident from the information provided what ‘need’ there actually is for properties built to the standards there is no evidence that these smaller properties are not selling, there is no evidence provided that customers are not satisfied with these properties or that these properties are not comparable to other properties available in the market area. The HBF consider that if the Government had just expected all properties to be built to NDSS they would have made these standards mandatory rather than optional. The HBF consider that standards can, in some instances, have a negative impact on viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The industry knows its customers and what they want, our members would not sell homes below the enhanced standard size if they did not appeal to the market. It should be noted that the HBF Annual Industry Customer Satisfaction Survey published March 2019 and completed by 60,955 new homeowners highlights that 90% of people who have bought a new home would do so again. It also highlights that 93% of homeowners are satisfied with the internal design and layout of their new home. This does not suggest that new homeowners have issues with the size of roofs provided or that there is a need for the NDSS to be introduced. Accessible and Adaptable Dwellings (M4(2)) Policy 46 looks for 65% of homes on developments of 10 or more (or over 0.5ha) to be at M4(2) standards, and for 5% to be provided at M4(3) standards. The HBF is generally supportive of providing homes that are suitable to meet the needs of those with limiting long term illnesses or disabilities. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. It must be remembered that all new homes will be built to Part M4(1). According to Part M of the Building Regulations meeting M4(1) will ensure reasonable provision for most people, including wheelchair users, to approach and enter the dwelling and to access habitable rooms and sanitary facilities on the entrance storey. As such these standards are likely to be suitable for the majority of people. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Doncaster which justifies the inclusion of optional higher standards for accessible / adaptable homes in its Local Plan policy. The Housing Design Standards Policy Evidence Paper (June 2019) identifies that 18.78% of the population of Doncaster was over 65 yrs in 2017 and that 24.83% will be by 2035. The HBF does not dispute the ageing population within Doncaster, however, it is not clear how this ageing population and potential future need reflects in the need for 65% of all new homes to be provided at M4(2) standards. If it had been the Government’s intention that generic statements identifying an ageing population justified adoption of the accessible & adaptable homes standards, then the logical solution would have been to incorporate the M4(2) as mandatory via the Building Regulations which the Government has not done. The optional higher M4(2) standard should only be introduced on a “need to have” rather than a “nice to have” basis. The evidence does not demonstrate this need. The Housing Design Standards Policy Evidence Paper (June 2019) also that older people and individuals with a long-term health problem or disability (LTHPD) would prefer to live in smaller, one or two bed-properties. It is not clear how this evidence has been considered in relation to the policy. 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 optional housing standards along with the cumulative requirements from other policies. If the Council can provide the appropriate evidence and...
this policy is to be included, then the HBF recommend that an appropriate transition period is included within the policy. The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances; and that policies for wheelchair accessible homes should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.

Summary:
Policy 46 is not considered to be sound as it is not justified or consistent with national policy. Nationally Described Space Standard. The Housing Design Standards Policy Evidence Paper (June 2019) surveyed 246 homes across 47 sites, to determine how many met the NDSS. It is not apparent if these sites had been submitted after the Government introduction of the NDSS, but it seems unlikely that it would have been in place at the time many of the applications were submitted. The Council indicate that through their research they have identified that a number of properties have not been built to the NDSS. They state that '201 out of the 246 plans assessed met the gross internal floor area based on their proposed number of bedrooms' and that 'plans were more likely to fail against the NDSS based on storage space or bedroom size, highlighting an internal design issue as opposed to dwelling plot size'. 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Response:
Due to non-applicability of the NDSS within Doncaster post the introduction of the optional standards, this point is considered irrelevant as the circumstances of development had not changed for the sites surveyed. The Council considers that the breadth of evidence presented in the evidence base paper highlights a strong need for the implementation of the NDSS within Doncaster. The standards are currently not required in Doncaster, as such consumers do not have a choice and can only buy what the market builds. The standards are currently not required in Doncaster, as such consumers do not have a choice and can only buy what the market builds even if this is substandard in certain regards. The implication of the NDSS will not significantly change the dwelling size of new builds in terms of number of bedrooms, it is the quality of each bedroom. With a set standard of decent bedroom sizes and adequate storage space, future home buyers, including those on lower incomes, may feel they do not need to buy a larger house with an increased number of bedrooms, thus offering them a cheaper, more affordable and quality option. For example they may only need to buy a good quality 2 bed property rather than a more expensive 3 bed with insufficient bedroom sizes and storage. The standards are currently not required in Doncaster, as such consumers do not have a choice and can only buy what the market builds even if this is substandard in certain regards. Whilst the Council acknowledges the results from the survey conducted by the HBF it questions the validity in relation to this argument and therefore relevance in relation to the implementation of the NDSS. It is reasonable and not unexpected to assume that the majority of new home owners would be satisfied with their product within a reasonable timeframe of completion and moving in. It is also not understood what specifically is referenced, if anything, in relation to room sizes, when the HBF refers to 'internal design and layout'- this could mean a lot of different things to different people. These surveys are primarily focused on the point of sale with questions regarding the condition of the home on move-in day, quality of finish and build defects, rather than focusing on the experience of living in the home. Support noted. The evidence base document applies the criteria in the NPPG. Whilst it is acknowledged that all homes are required to be built to M4(1) standard, and this may be suitable for certain households, the mandatory standard is not acceptable for the needs of an ever growing percentage of the population hence why the government have introduced higher accessibility standards. The
acknowledgment that M4(1) standards are not sufficient has been presented by the Housing Communities and Local Government Committee and the Women and Equalities Committee whom both set out recommendations that M4(2) should be transferred from optional to mandatory for all new dwellings. In their report, it was stated that making M4(2) mandatory was needed as the current M4(1) was evidently too low to meet the needs of the population. Generic statements where made are supported by evidence. Data presented on the ageing population in Doncaster is considered alongside the detailed further evidence set out within the evidence paper, as required by the NPPG. The ageing population data is considered against the context of all the other data the evidence base is presenting. The NPPG requires local authorities to consider the size needed to meet specifically evidenced needs. The evidence paper demonstrates the aspiration for smaller dwelling size properties for the ageing population and a preference to downsize, but also acknowledges that some households would prefer larger dwelling sizes. It is not the intention of the policy to determine the mix of dwelling sizes upon sites. The discussion within the evidence paper is to demonstrate the potential size needed as required by the NPPG. The evidence paper presents the findings from the two Council Viability studies that have fed into the development of the Local Plan. - The viability testing considers a number of different viability scenarios. This includes the 'base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost' developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in. It also presents the additional costs of the standards as presented in the Government’s impact assessment at the time which highlight a minimal increase in build costs. This is also considered alongside other societal benefits of the standards that were acknowledged in the Government’s impact assessment. The Council has also included in the policy the provision for applicants to robustly demonstrate, with appropriate evidence, that adhering to the standards is not viable. It is considered that if it was the Government’s intention to provide an appropriate transition period to accompany the adoption of the accessible and adaptable home standards, then the requirement for one would have been set out in the NPPF or NPPG as is the case with space standards. Policy 46 and the supporting text sets out the NPPG required further considerations that should be taken into account; Policy 46 C acknowledges that policies for wheelchair accessible homes should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling, as such the policy specifies the requirement of wheelchair adaptable dwellings only.
11.1. Strata Homes is concerned with Policy 46 and consider that the Policy 46 is unsound. Test of Soundness 11.2. Strata Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy. Justification 11.3. Strata Homes is concerned that part A of this policy is seeking to implement national space standards without the requisite justification and evidence. 11.4. This policy looks for development to meet national spaces standards as a minimum (for residential). The enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis. 11.5. PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas. 11.6. Need - evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. 11.7. Viability - the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. 11.8. Timing - there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'. 11.9. Strata Homes welcomes the provision of new evidence on Housing Design Standards Policy. Strata Homes consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The housebuilding industry knows its customers what type and size of housing is in demand. The use of Nationally Described Space Standards, can therefore impact on the delivery of affordable products, and can serve to stifle innovative design. 11.10. On NDSS Strata Homes would encourage the Council to recognise the larger land take such houses will require more land take. Therefore to deliver this would reduce the yield of sites and could have potential implications on the site yields identified by the Council on identified and allocated sites, ultimately resulting in the Council failing to meet their housing targets. 11.11. Strata Homes note that the viability assessment has applied an average house size which is stated to reflect NDSS, However Strata Homes note that the mix tested does not reflect the Policy 8 requirement. Further the viability demonstrates that site typologies in low value areas are unviable based on the base assumptions, and viability is worsened with addition of other planning requirements of the Local Plan, and in some circumstances some typologies in medium value areas were demonstrated to be unviable. The 23% affordable housing requirement has not been tested in combination with all the requirements of Policy 46, Strata Homes consider that there needs to be greater flexibility in Policy 46 with regards to the use of NDSS. 11.12. Strata Homes is also concerned that part B of this policy states that 65% of all new homes on housing developments of 10 or more units should be built to Part M4(2) of the Building Regulations i.e. accessible and adaptable dwellings. This is a significant increase in the requirement expressed in the earlier draft which required 30% of all housing to meet the standards of Building regulation requirement M4 (2). 11.13. Strata Homes is generally supportive of providing homes for older and disabled persons. However, if the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG. The SHMA, Economic Forecasts and Housing Needs Assessment and subsequent Housing Design Standards Policy Evidence paper unfortunately does not provide sufficient evidence and does not justify the Council's position identified in the policy. The Housing Needs Assessment 2019, whilst referred to in the background paper and Local Plan was not available at the time of writing. Strata Homes reserve the right to comment further when this is made available. 11.14. It is important that if the Council are seeking the higher optional standards that the evidence is forthcoming. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. 11.15. The Written Ministerial Statement dated 25th March 2015 stated that: 11.16. The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG. 11.17. NPPG states that where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations and should not impose any additional information requirements (for instance provision of furnished layouts) or seek to determine compliance with these requirements, which is the role of the Building Control Body. This is to ensure that all parties have the clarity and certainty of knowing which standards they have to deal with and can factor these into their plans. For developers, this ensures that the design and procurement complications that previously arose from a series of different standards in different areas are avoided. It was recognised that it was not appropriate to apply Category 2 or 3 standards to all new homes as not all people who buy or move in to new homes need or wish to have such provision. Category 2 and 3 standards were therefore made "optional" with the position being that the case for requiring such standards in future new homes should be made through the adoption of local plan policies that have properly assessed the level of requirement for these standards in the local area, also taking into account other relevant factors including the impact on project viability. 11.18. Strata Homes does not dispute the population is ageing. However, it is unclear
how this ageing population and potential future need reflects in the need for 65 percent of all new homes on sites of 10 or more dwellings to be provided at M4(2) standards. The optional higher M4(2) standard should only be introduced on a "need to have" rather than a "nice to have" basis. Although there is evidence of an ageing population having regard to the PPG this does not amount to the justification required for the Council to include the optional standard as specified in Policy 46. 11.19. The Councils housing Design Standards Policy Evidence Paper evidences the ageing population, indicating that the percentage of over 65's grows from 18.7% to 25%. Not all people over 65 will require a new home or adapted home. Indeed the paper recognises this in paragraph 2.53 where it states "not all of this demand will be met through new builds, and existing stock will play some part". The paper notes considers the level of people with Limiting Long Term Illnesses or Disabilities and expects just less than 40% of households will have a person with a long term health problem or disability, the majority of people with a long term health problem or disability are over 65 (60%). Thus there is not sufficient evidence to support a requirement of 65% based on evidence of need. 11.20. It is important that the Council recognises the viability implications of requiring all houses to meet these enhanced standards. The whole plan viability evidence notes that all typologies in low value areas are unviable before the consideration of the impact of M4(2) and M4(3) standards. The paper also notes that the application of M4(2) and M4(3) some typologies are unviable in medium value areas, when tested against a base assumption for affordable housing of 15% and not 23% as sought through Policy 8, Therefore, Strata Homes consider that this could result in stalled development where time is taken to debate viability issues. The Council must 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. Strata Homes would urge the Council to reduce the percentage requirements to ensure the deliverability of any policy. The policy must not be set at such a scale that will threaten development to be in line with the Framework and guidance established in PPG. 11.21. Strata Homes consider that the requirements in Policy 46 are not justified and does not provide an appropriate strategy. The Plan is its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 11.22. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 11.23. However, Strata Homes consider that with increased flexibility in Part A in relation to NDSS, and a reduction of the target in part B to reflect evidence on need the Local Plan can be found sound. Strata Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 11.24. To overcome the objection and address soundness matters, the Council should: - Remove or increase the flexibility in part A of the policy which refers to national space standards - Remove or significantly reduce the requirement in Part B of the policy which requires 65% of all new homes to be accessible and adaptable.

Summary:
Part A of Policy 46 is seeking to implement national space standards without the requisite justification and evidence. Strata Homes welcomes the provision of new evidence on Housing Design Standards Policy. Strata Homes consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The housebuilding industry knows its customers what type and size of housing is in demand. The use of Nationally Described Space Standards, can therefore impact on the delivery of affordable products, and can serve to stifle innovative design. On NDSS Strata Homes would encourage the Council to recognise the larger land take such houses will require more land take. Therefore to deliver this would reduce the yield of sites and could have potential implications on the site yields identified by the Council on identified and allocated sites, ultimately resulting in the Council failing to meet their housing targets. Strata Homes note that the viability assessment has applied an average house size which is stated to reflect NDSS, However Strata Homes note that the mix tested does not reflect the Policy 8 requirement. Further the viability demonstrates that site typologies in low value areas are unviable based on the base assumptions, and viability is worsened with addition of other planning requirements of the Local Plan, and in some circumstances some typologies in medium value areas were demonstrated to be unviable. The 23% affordable housing requirement has not been tested in combination with all the requirements of Policy 46, Strata Homes consider that there needs to be greater flexibility in Policy 46 with regards to the use of NDSS. Strata Homes is also concerned that part B of this policy states that 65% of all new homes on housing developments of 10 or more units should be built to Part M4(2) of the Building Regulations i.e. accessible and adaptable dwellings. This is a significant increase in the requirement expressed in the earlier draft which required 30% of all housing to meet the standards of Building regulation requirement M4 (2). Strata Homes is generally supportive of providing homes for older and disabled persons. However, the SHMA, Economic Forecasts and Housing Needs Assessment and subsequent Housing Design Standards Policy Evidence paper unfortunately does not provide sufficient evidence and does not justifiy the Council's position identified in the policy. The Housing Needs Assessment 2019, whilst referred to in the background paper and Local Plan was not available at the time of writing. Strata Homes reserve the right to comment further when this is made available. NPPG states that where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations and should not impose any additional information requirements (for instance provision of furnished layouts) or seek to determine compliance with these requirements, which is the role of the Building Control Body. This is to ensure that all parties have the clarity and certainty of knowing which standards they have to deal with and can factor these into their plans. For developers, this ensures that the design and procurement complications that previously arose from a series of different standards in different areas are avoided. It was recognised that it was not appropriate to apply Category 2 or 3 standards to all new homes as not all people who buy or move in to new homes need or wish to have such provision. Category 2 and 3 standards were therefore made "optional" with the position being that the case for requiring such standards in future new homes should be made through the adoption of local plan policies that have properly assessed the level of requirement for these standards in the local area, also taking into account other relevant factors including the impact on project viability. Strata Homes does not dispute the population is ageing. However, it is unclear how this ageing population and potential future need reflects in the need for 65 percent of all new homes on sites of 10 or more dwellings to be provided at M4(2) standards. The optional higher M4(2) standard should only be introduced on a "need to have" rather than a "nice to have" basis. Although there is evidence of an ageing population having regard to the PPG this does not amount to the justification required for the Council to include the optional standard as specified in Policy 46. The Councils housing Design Standards Policy Evidence Paper evidences the ageing population, indicating that the percentage of over 65's grows from 18.7% to 25%, Not all people over 65 will require a new home or adapted home. Indeed the paper recognises this in paragraph 2.53 where it states "not all of this demand will be met through new builds, and existing stock will play some part". The paper notes considers the level of people with Limiting Long Term Illnesses or Disabilities and expects just less than 40% of households will have a person with a long term health problem or disability, the majority of people with a long term health problem or disability are over 65 (60%). Thus there is not sufficient evidence to support a requirement of 65% based on evidence of need. It is important that the Council recognises the viability implications of requiring all houses to meet these enhanced standards. The whole plan viability evidence notes that all typologies in low value areas are unviable before the consideration of the impact of M4(2) and M4(3) standards, It also demonstrates that the application of M4(2) and M4(3) some typologies are unviable in medium value areas, when tested against a base assumption for affordable housing of 15% and not 23% as sought through Policy 8, Therefore, Strata Homes consider that this could result in
stalled development where time is taken to debate viability issues. The Council must 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. Strata Homes would urge the Council to reduce the percentage requirements to ensure the deliverability of any policy. The policy must not be set at such a scale that will threaten development to be in line with the Framework and guidance established in PPG. Strata Homes consider that with increased flexibility in Part A in relation to NDSS, and a reduction of the target in part B to reflect evidence on need the Local Plan can be found sound. To overcome the objection and address soundness matters, the Council should: - Remove or increase the flexibility in part A of the policy which refers to national space standards - Remove or significantly reduce the requirement in Part B of the policy which requires 65% of all new homes to be accessible and adaptable.

Response:

The Council has addressed these issues within the evidence paper, and in some of the more detailed responses below. The implication of the NDSS will not change the dwelling size of new builds in terms number of bedrooms, it is the quality of each bedroom. With a set standard of decent bedroom sizes and adequate storage space, future home buyers, including those on lower incomes, may feel they do not need to buy a larger house with an increased number of bedrooms, thus offering them a cheaper, more affordable and quality option. For example they may then only need to buy a good quality 2 bed property rather than a more expensive 3 bed with insufficient bedroom sizes and storage. The Council acknowledged this point about innovation in the drafting of Policy 46 and points to the allowance of a potential deviation from the NDSS through being robustly justified and offset through exceptional or innovative design, outlined within the Policy and explanatory text. The Council rejects the idea that the implementation of the NDSS would have a negative impact on the yield of sites, and consequently resulting in the Council failing to meet their housing targets. The Council has addressed the plot size of dwellings required to meet the standards compared to the survey sample in the evidence paper. - The viability testing (Pg 55) explains why it has taken an overall average dwelling size approach given the vast number of variable combinations/appraisals that would result otherwise e.g. different sizes are prescribed depending on number of bedrooms, number of persons and number of storeys. Policy 8 does not prescribe a set mix of housing, but states that sizes, types, price and tenure should address needs and market demand identified in the latest SHMA or other robust evidence. The viability testing considers a number of different viability scenarios. This includes the 'base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost' developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in. The Council acknowledges that the publication version includes a higher percentage requirement for Policy 46 B), however the figures presented during the informal consultation were not fixed and at the time the evidence base was still under preparation. This policy requirement has been developed using the evidence in the Housing Design Standards Evidence Base. The Council feels the evidence provided meets the requirements set out in the PPG for the implementation of the policy. The PPG sets out the evidence required for the standards the Council is implementing in Policy 46. For standards reflecting accessibility and adaptability, evidence is required to show the likely future need, size, location, type and quality of dwellings needed, evaluation of existing stock, how needs vary across tenures and viability impact. For standards impacting space, evidence is required to show need, viability and timing. The evidence paper uses a range of local and national data sources to demonstrate each of the required sections, as well as analyse the data holistically. The Housing Needs Survey 2019 is available online. The Council has robustly outlined why the policy has stated a requirement of 65% within the evidence paper. The evidence base, and policy percentage requirement, acknowledges that the existing stock will play some part with the emerging population demographic change. However, the existing stock can only play a limited part in the establishment of appropriate homes in Doncaster as outlined within the evidence paper. The Council has outlined why the policy has stated a requirement of 65% within the evidence paper. See response above in respect to the need to take a holistic look at the viability evidence base as opposed to just looking at a single test result. No robust evidence has been provided by the representor, or others with similar representations, to demonstrate viability is an issue. The evidence paper presents the findings from the two Council Local Plan Viability studies that have fed into the development of the Local Plan, which was informed by information from (and workshops with) the industry. The evidence paper also presents the additional costs of the standards as presented in the Government’s impact assessment at the time which highlight a minimal increase in build costs. This is also considered alongside other societal benefits of the standards that were acknowledged in the Government’s impact assessment. The Council has also included in the policy the provision for applicants to robustly demonstrate, with appropriate evidence, that adhering to the standards is not viable.
Policy 46 seeks that development meets national space standards as a minimum. Gladman would remind the Council these standards, introduced by Government, are intended to be optional and should only be a policy requirement where there is a clear need and they retain development viability. As such they were introduced on a ‘need to have’ rather than on a ‘nice to have’ basis. PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that ‘where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas: - Need - evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. - Viability - the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. - Timing - there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’. We consider it essential that the Council have robust and justifiable evidence to introduce any of the optional housing standards, based on the above criteria. Further we suggest that standards can, in some instances, have a negative impact upon viability, consumer choice and increase affordability issues.

Summary:
It is essential that the Council demonstrates that it has robust and justifiable evidence to introduce any of the optional housing standards, based on the criteria set out in PPG (ID 56-020). Standards can, in some instances, have a negative impact upon viability, consumer choice and increase affordability issues.

Response:
National policy in the NPPF and NPPG says LPA’s can bring in optional housing standards where a need can be demonstrated and this has been viability tested. The evidence paper sets out the need and viability has been considered under the whole plan viability testing.
3.49 Policy 46 states that:  

a) In order to ensure homes are large enough for the intended number of inhabitants, all new housing should meet the Nationally Described Space Standard as a minimum.  
b) In order to provide suitable and genuine housing choices for an ageing population and those with Limiting Long Term Illnesses or Disabilities, at least 65% of all new homes on housing developments of over 0.5 hectare or 10 or more units should meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’.  
c) In order to provide suitable and genuine housing choices for occupants with more specific needs, at least 5% of all new homes on housing developments of over 0.5 Hectare or 10 or more units should meet Building Regulations requirement M4(3) ‘wheelchair adaptable dwellings’.  

3.50 Policy 46 also sets out that the above standards (or any subsequent equivalents or improved national mandatory minimum requirements) should be met in all cases, and any deviation from the minimum space standards must be robustly justified and offset through exceptional or innovative design.  

3.51 We object to Policy 46.  

Recommendation 3.52 The matter of housing standards should be dealt with under national policy.

Summary:  
Object to Policy 46 - the matter of housing standards should be dealt with under national policy.

Response:  
Housing standards are dealt with under national policy. National policy in the NPPF and NPPG says LPA’s can bring in optional housing standards where a need can be demonstrated and this has been viability tested. The evidence paper sets out the need and viability has been considered under the whole plan viability testing.
### Tests of Soundness:

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<th>Positively prepared</th>
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### Comment:

Nationally Described Space Standards This policy requires residential development proposals to meet national space standards as a minimum. However, these enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and where they do not have an adverse impact on viability which might undermine the delivery of a plan. As such they can only be introduced on a ‘need to have’ rather than a ‘nice to have’ basis. The Council has produced an evidence based document entitled the 'Housing Design Standards Policy Local Plan Evidence Base' with the objective of justifying the policy. This aims to provide justification for the requirement of internal space standards and, as outlined by the PPG (ID56-020), this is broken down into three areas: need, viability, and timing. Need The evidence base highlights that on average new dwellings in the UK and in particular in the Yorkshire and Humber are significantly smaller than developments in Europe despite similar issues and restrictions. While this may indicate a wider issue it is not locally specific to the Council. As part of his study DMBC surveyed 246 homes across 47 sites to determine how many met the nationally described space standards (NDSS) of the area suggests that of current new dwellings and their floor plans only 23 out of 246 dwellings would meet the NDSS as proposed. It is not apparent if these sites had been submitted after the Government introduction of the NDSS, but it seems unlikely that it would have been in place at the time many of the applications were submitted. The Council indicate that through their research they have identified that a number of properties have not been built to the NDSS. They state that ‘201 out of the 246 plans assessed met the gross internal floor area based on their proposed number of bedrooms’ and that ‘plans were more likely to fail against the NDSS based on storage space or bedroom size, highlighting an internal design issue as opposed to dwelling plot size’. This is a small sample of only 246 dwellings and therefore provides insignificant evidence to base the policy upon. It also suggests that the majority of sites are meeting some of the standards and therefore the actual need within the Borough appears to be overestimated. The Council also suggest that the NDSS would be beneficial in providing ventilation, reducing under-occupancy and over-crowding. However, the evidence provided is limited in terms of numbers of properties considered and the potential market comparisons made. It is not evident from the information provided what ‘need’ there actually is for properties built to the standards there is no evidence that these smaller properties are not selling, there is no evidence provided that customers are not satisfied with these properties or that these properties are not comparable to other properties available in the market area. Viability It is stated that the impact on affordability would differ depending on how far the current design is divergent from the standard. The Council contend that the sample survey indicates that the vast majority of dwellings would only need internal design changes to meet the NDSS, and thus there would be little extra cost incurred by the developer or buyer. It is also stated that the benefit of increased storage space and bigger sized bedrooms could allow some households to buy a house with fewer bedrooms than they would have originally looked for. The council contends that the impact on affordability would be minimal. However, the introduction of the NDSS would significantly reduce customer choice. Persimmon Homes build family homes which includes a range of entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms, in order that customers can adequately house their families. This includes a range of products geared towards first-time buyers, first-time movers and young families. Arbitrarily increasing the size of all homes will result in an increase in build cost. Persimmon Homes builds in excess of 16,500 homes each year in around 375 prime locations and is proud to be one of the UK’s leading house builders, committed to the highest standards of design, construction and service. The industry understands customers and their needs and, accordingly, designed homes which appeal to the market. Timing It is suggested by the Council that as the Emerging Local Plan is still to go through an examination and that as consultation has been undertaken as part of the Local Plan process over a significant period of time that this has provided sufficient time to notify developers of the upcoming changes. The Local Plan policies have yet to be formally assessed by an inspector and may be subject to modifications during this process. Although developers may be aware of draft policies sufficient time post adoption should be allowed as a transitional period. In addition, changes to internal layout requirements may take developers some time to design. The proposal within the policy is that 100% of new dwellings should meet the standards. The policy stating that any deviation from the NDSS must be robustly justified, clearly evidenced and offset through exceptional and innovative design. This is overly restrictive and will force developers to provide onerous evidence. Persimmon Homes consider that this policy has not been prepared in a manner which is consistent with national policy and guidance and that it has not been positively prepared. The policy has not been effectively justified to provide a clear rationale for the imposition of the NDSS standards or for the quantum of 100% of new homes. The Council should, unless they can provide sufficient evidence, remove this policy. With regards to the quantum, the Council has not tested alternative options such as requiring a lower percentage of homes to meet the NDSS standard. The policy is therefore not based on an appropriate strategy and all options should be tested and subject to sustainability appraisal. Accessible and Adaptable Dwellings (M4(2)) Policy 46 seeks to require 65% of homes on developments of 10 or more (or over 0.5ha) to meet the M4(2) optional standard, and for 5% of homes to meet the M4(3) standard. While the provision of homes suitable for those with limiting long term illnesses or disabilities is supported, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. It must be remembered that all new homes will be built to part M4(1). According to Part M of
the Building Regulations meeting M4(1) will ensure reasonable provision for most people, including wheelchair users, to approach and enter the dwelling and to access habitable rooms and sanitary facilities on the entrance storey. As such these standards are likely to be suitable for the vast majority of people. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Doncaster which justifies the inclusion of optional higher standards for accessible / adaptable homes in its Local Plan policy. The Housing Design Standards Policy Evidence Paper (June 2019) identifies that 18.78% of the population of Doncaster was over 65 years in 2017 and that 24.83% will be by 2035. It is not clear how this ageing population and potential future need is reflected in or justifies the proposed requirement for 65% of all new homes to be provided at M4(2) standards. If it had been the Government’s intention that generic statements identifying an ageing population justified adoption of the accessible & adaptable homes standards, then the logical solution would have been to incorporate the M4(2) as mandatory via the Building Regulations which the Government has not done. The optional higher M4(2) standard should only be introduced on a "need to have" rather than a "nice to have" basis. The evidence does not demonstrate this need. The Whole Plan Viability Testing (2019) report outlines that the policy will result in viability issues for some sites. It shows that schemes in the low value areas are not viable and will not be able to support the optional housing standards along with the cumulative requirements of other policies. If the Council can provide the appropriate evidence and this policy is to be included, then it is recommended that an appropriate transition period is included within the policy. The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances; and that policies for wheelchair accessible homes should only be applied to affordable housing provided in certain tenures for example. The policy should therefore be removed, or requirement reduced significantly to reflect the evidence and viability concerns.

Summary:
The Council’s evidence base document ‘Housing Design Standards Policy Local Plan Evidence Base’ does not justify the policy. Policy 46 requires residential development to meet national space standards as a minimum. However, these enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and where they do not have an adverse impact on viability which might undermine the delivery of a plan. As such they can only be introduced on a ‘need to have’ rather than a ‘nice to have’ basis. Need There is a lack of Doncaster-specific evidence to demonstrate need and the sample size is too small to draw conclusions. Evidence used suggests that the majority of sites are meeting some of the standards and therefore the actual need within the Borough appears to be overestimated. Viability It is stated that the impact on affordability would differ depending on how far the current design is divergent from the standard. The Council contended that the sample survey indicates that the vast majority of dwellings would only need internal design changes to meet the NDSS, and thus there would be little extra cost incurred by the developer or buyer. It is also stated that the benefit of increased storage space and bigger sized bedrooms could allow some households to buy a house with fewer bedrooms than they would have originally looked for. The Council contends that the impact on affordability would be minimal. However, the introduction of the NDSS would significantly reduce customer choice. Persimmon Homes build family homes which includes a range of entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms, in order that customers can adequately house their families. This includes a range of products geared towards first-time buyers, first-time movers and young families. Arbitrarily increasing the size of all homes will result in an increase in build cost. Timing Although developers may be aware of draft policies sufficient time post adoption should be allowed as a transitional period. In addition, changes to internal layout requirements may take developers some time to design. Accessible and Adaptable Dwellings (M4(2)) PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Doncaster which justifies the inclusion of optional higher standards for accessible / adaptable homes in its Local Plan policy. The Housing Design Standards Policy Evidence Paper (June 2019) identifies that 18.78% of the population of Doncaster was over 65 years in 2017 and that 24.83% will be by 2035. It is not clear how this ageing population and potential future need is reflected in or justifies the proposed requirement for 65% of all new homes to be provided at M4(2) standards. If it had been the Government’s intention that generic statements identifying an ageing population justified adoption of the accessible & adaptable homes standards, then the logical solution would have been to incorporate the M4(2) as mandatory via the Building Regulations which the Government has not done. The Whole Plan Viability Testing (2019) report outlines that the policy will result in viability issues for some sites. It shows that schemes in the low value areas are not viable and will not be able to support the optional housing standards along with the cumulative requirements of other policies. If the Council can provide the appropriate evidence and this policy is to be included, then it is recommended that an appropriate transition period is included within the policy.

Response:
National policy in the NPPF and NPPG says LPA’s can bring in optional housing standards where a need can be demonstrated and this has been viability tested. The evidence paper sets out the need and viability has been considered under the whole plan viability testing. The Council considers that the breadth of evidence presented in the evidence base paper highlights a strong need for the implementation of the NDSS within Doncaster. The implication of the NDSS will not change the dwelling size of new builds in terms of number of bedrooms, it is the quality of each bedroom. With a set standard of decent bedroom sizes and adequate storage space, future home buyers, including those on lower incomes, may feel they do not need to buy a larger house with an increased number of bedrooms, thus offering them a cheaper, more affordable and quality option. For example they may then only need to buy a good quality 2 bed property rather than a more expensive 3 bed with insufficient bedroom sizes and storage. Generic statements where made are supported by evidence. Data presented on the ageing population in Doncaster is considered alongside the detailed further evidence set out within the evidence paper, as required by the NPPG. The ageing population data is considered against the context of all the other data the evidence base is presenting. The viability testing considers a number of different viability scenarios. This includes the 'base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost' developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in. No robust evidence has been provided by the representor, or others with similar representations, to demonstrate viability is an issue. The evidence paper presents the findings from the two Council Local Plan Viability studies that have fed into the development of the Local Plan, which was informed by information from (and workshops with) the industry. The evidence paper also presents the additional costs of the standards as presented in the Government’s impact assessment at the time which highlight a minimal increase in build costs. This is also considered alongside other societal benefits of the standards that were acknowledged in the Government’s impact assessment. The Council has
also included in the policy the provision for applicants to robustly demonstrate, with appropriate evidence, that adhering to the standards is not viable.
11.1. H. Burtwistle & Son is concerned with Policy 46 and consider that the Policy 46 is unsound. Test of Soundness 11.2. H. Burtwistle & Son considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 11.3. H. Burtwistle & Son is concerned that part A of this policy is seeking to implement national space standards without the requisite justification and evidence. 11.4. This policy looks for development to meet national spaces standards as a minimum (for residential). The enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis. 11.5. PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas. 11.6. Need - evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. 11.7. Viability - the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. 11.8. Timing - there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’. 11.9. H. Burtwistle & Son welcomes the provision of new evidence on Housing Design Standards Policy. H. Burtwistle & Son consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The housebuilding industry knows its customers what type and size of housing is in demand. The use of Nationally Described Space Standards, can therefore impact on the delivery of affordable products, and can serve to stifle innovative design. 11.10. On NDSS H. Burtwistle & Son would encourage the Council to recognise the larger land take such houses will require more land take. Therefore to deliver this would reduce the yield of sites and could have potential implications on the site yields identified by the Council on identified and allocated sites, ultimately resulting in the Council failing to meet their housing targets. 11.11. H. Burtwistle & Son note that the viability assessment has applied an average house size which is stated to reflect NDSS, However H. Burtwistle & Son note that the mix tested does not reflect the Policy 8 requirement. Further the viability demonstrates that site typologies in low value areas are unviable based on the base assumptions, and viability is worsened with addition of other planning requirements of the Local Plan, and in some circumstances some typologies in medium value areas were demonstrated to be unviable. The 23% affordable housing requirement has not been tested in combination with all the requirements of Policy 46, H. Burtwistle & Son consider that there needs to be greater flexibility in Policy 46 with regards to the use of NDSS. 11.12. H. Burtwistle & Son is also concerned that part B of this policy states that 65% of all new homes on housing developments of 10 or more units should be built to Part M4(2) of the Building Regulations i.e. accessible and adaptable dwellings. This is a significant increase in the requirement expressed in the earlier draft which required 30% of all housing to meet the standards of Building regulation requirement M4 (2). 11.13. H. Burtwistle & Son is generally supportive of providing homes for older and disabled persons. However, if the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG. The SHMA, Economic Forecasts and Housing Needs Assessment and subsequent Housing Design Standards Policy Evidence paper unfortunately does not provide sufficient evidence and does not justify the Council's position identified in the policy. The Housing Needs Assessment 2019, whilst referred to in the background paper and Local Plan was not available at the time of writing. H. Burtwistle & Son reserve the right to comment further when this is made available. 11.14. It is important that if the Council are seeking the higher optional standards that the evidence is forthcoming. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. 11.15. The Written Ministerial Statement dated 25th March 2015 stated that: 11.16. The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG. 11.17. NPPG states that where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations and should not impose any additional information requirements (for instance provision of furnished layouts) or seek to determine compliance with these requirements, which is the role of the Building Control Body. This is to ensure that all parties have the clarity and certainty of knowing which standards they have to deal with and can factor these into their plans. For developers, this ensures that the design and procurement complications that previously arose from a series of different standards in different areas are avoided. It was recognised that it was not appropriate to apply Category 2 or 3 standards to all new homes as not all people who buy or move in to new homes need or wish to have such provision. Category 2 and 3 standards were therefore made "optional" with the position being that the case for requiring such standards in future new homes should be made through the adoption of local plan policies that have properly assessed the level of requirement for these standards in the local area, also taking into account other relevant factors including the impact on
11.18. H. Burtwistle & Son does not dispute the population is ageing. However, it is unclear how this ageing population and potential future need reflects in the need for 65 percent of all new homes on sites of 10 or more dwellings to be provided at M4(2) standards. The optional higher M4(2) standard should only be introduced on a “need to have” rather than a “nice to have” basis. Although there is evidence of an ageing population having regard to the PPG this does not amount to the justification required for the Council to include the optional standard as specified in Policy 46. 11.19. The Councils housing Design Standards Policy Evidence Paper evidences the ageing population, indicating that the percentage of over 65’s grows from 18.7% to 25%. Not all people over 65 will require a new home or adapted home. Indeed the paper recognises this in paragraph 2.53 where it states “not all of this demand will be met through new builds, and existing stock will play some part”. The paper notes considers the level of people with Limiting Long Term Illnesses or Disabilities and expects just less than 40% of households will have a person with a long term health problem or disability, the majority of people with a long term health problem or disability are over 65 (60%). Thus there is not sufficient evidence to support a requirement of 65% based on evidence of need. 11.20. It is important that the Council recognises the viability implications of requiring all houses to meet these enhanced standards. The whole plan viability evidence notes that all typologies in low value areas are unviable before the consideration of the impact of M4(2) and M4(3) standards, It also demonstrates that the application of M4(2) and M4(3) some typologies are unviable in medium value areas, when tested against a base assumption for affordable housing of 15% and not 23% as sought through Policy 8, Therefore, H. Burtwistle & Son consider that this could result in stalled development where time is taken to debate viability issues. The Council must 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. H. Burtwistle & Son would urge the Council to reduce the percentage requirements to ensure the deliverability of any policy. The policy must not be set at such a scale that will threaten development to be in line with the Framework and guidance established in PPG. 11.21. H. Burtwistle & Son consider that the requirements in Policy 46 are not justified and does not provide an appropriate strategy. The Plan is its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 11.22. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 11.23. However, H. Burtwistle & Son consider that with increased flexibility in Part A in relation to NDSS, and a reduction of the target in part B to reflect evidence on need the Local Plan can be found sound. H. Burtwistle & Son will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 11.24. To overcome the objection and address soundness matters, the Council should: - Remove or increase the flexibility in part A of the policy which refers to national space standards - Remove or significantly reduce the requirement in Part B of the policy which requires 65% of all new homes to be accessible and adaptable.

Summary:

Policy 46 - Housing Design Standards. 1. Policy could impact on deliverability and viability. 2. Part A - national space Standards - no evidence to justify implementation. 3. Remove or increase flexibility 4. Part B - remove or reduce the requirement (65% of all new homes to be accessible/adaptable).

Response:

Refer to response for representation 02073 which raises similar issues.
H. Burtwistle & Son is concerned with Policy 46 and consider that the Policy 46 is unsound. Test of Soundness 11.2. H. Burtwistle & Son considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy. Justification 11.3. H. Burtwistle & Son is concerned that part A of this policy is seeking to implement national space standards without the requisite justification and evidence. 11.4. This policy looks for development to meet national spaces standards as a minimum (for residential). The enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis. 11.5. PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas. 11.6. Need - evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. 11.7. Viability - the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. 11.8. Timing - there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'. 11.9. H. Burtwistle & Son welcomes the provision of new evidence on Housing Design Standards Policy. H. Burtwistle & Son consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The housebuilding industry knows its customers what type and size of housing is in demand. The use of Nationally Described Space Standards, can therefore impact on the delivery of affordable products, and can serve to stifle innovative design. 11.10. On NDSS H. Burtwistle & Son would encourage the Council to recognise the larger land take such houses will require more land take. Therefore to deliver this would reduce the yield of sites and could have potential implications on the site yields identified by the Council on identified and allocated sites, ultimately resulting in the Council failing to meet their housing targets. 11.11. H. Burtwistle & Son note that the viability assessment has applied an average house size which is stated to reflect NDSS, However H. Burtwistle & Son note that the mix tested does not reflect the Policy 8 requirement. Further the viability demonstrates that site typologies in low value areas are unviable based on the base assumptions, and viability is worsened with addition of other planning requirements of the Local Plan, and in some circumstances some typologies in medium value areas were demonstrated to be unviable. The 23% affordable housing requirement has not been tested in combination with all the requirements of Policy 46. H. Burtwistle & Son consider that there needs to be greater flexibility in Policy 46 with regards to the use of NDSS. 11.12. H. Burtwistle & Son is also concerned that part B of this policy states that 65% of all new homes on housing developments of 10 or more units should be built to Part M4(2) of the Building Regulations i.e. accessible and adaptable dwellings. This is a significant increase in the requirement expressed in the earlier draft which required 30% of all housing to meet the standards of Building regulation requirement M4 (2). 11.13. H. Burtwistle & Son is generally supportive of providing homes for older and disabled persons. However, if the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG. The SHMA, Economic Forecasts and Housing Needs Assessment and subsequent Housing Design Standards Policy Evidence paper unfortunately does not provide sufficient evidence and does not justify the Council’s position identified in the policy. The Housing Needs Assessment 2019, whilst referred to in the background paper and Local Plan was not available at the time of writing. H. Burtwistle & Son reserve the right to comment further when this is made available. 11.14. It is important that if the Council are seeking the higher optional standards that the evidence is forthcoming. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. 11.15. The Written Ministerial Statement dated 25th March 2015 stated that: 11.16. The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG. 11.17. NPPG states that where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations and should not impose any additional information requirements (for instance provision of furnished layouts) or seek to determine compliance with these requirements, which is the role of the Building Control Body. This is to ensure that all parties have the clarity and certainty of knowing which standards they have to deal with and can factor these into their plans. For developers, this ensures that the design and procurement complications that previously arose from a series of different standards in different areas are avoided. It was recognised that it was not appropriate to apply Category 2 or 3 standards to all new homes as not all people who buy or move in to new homes need or wish to have such provision. Category 2 and 3 standards were therefore made "optional" with the position being that the case for requiring such standards in future new homes should be made through the adoption of local plan policies that have properly assessed the level of requirement for these standards in the local area, also taking into account other relevant factors including the impact on
project viability. 11.18. H. Burtwistle & Son does not dispute the population is ageing. However, it is unclear how this ageing population and potential future need reflects in the need for 65 percent of all new homes on sites of 10 or more dwellings to be provided at M4(2) standards. The optional higher M4(2) standard should only be introduced on a ”need to have” rather than a ”nice to have” basis. Although there is evidence of an ageing population having regard to the PPG this does not amount to the justification required for the Council to include the optional standard as specified in Policy 46. 11.19. The Councils housing Design Standards Policy Evidence Paper evidences the ageing population, indicating that the percentage of over 65’s grows from 18.7% to 25%. Not all people over 65 will require a new home or adapted home. Indeed the paper recognises this in paragraph 2.53 where it states ”not all of this demand will be met through new builds, and existing stock will play some part”. The paper notes considers the level of people with Limiting Long Term Illnesses or Disabilities and expects just less than 40% of households will have a person with a long term health problem or disability, the majority of people with a long term health problem or disability are over 65 (60%). Thus there is not sufficient evidence to support a requirement of 65% based on evidence of need. 11.20. It is important that the Council recognises the viability implications of requiring all houses to meet these enhanced standards. The whole plan viability evidence notes that all typologies in low value areas are unviable before the consideration of the impact of M4(2) and M4(3) standards, It also demonstrates that the application of M4(2) and M4(3) some typologies are unviable in medium value areas, when tested against a base assumption for affordable housing of 15% and not 23% as sought through Policy 8, Therefore, H. Burtwistle & Son consider that this could result in stalled development where time is taken to debate viability issues. The Council must 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. H. Burtwistle & Son will urge the Council to reduce the percentage requirements to ensure the deliverability of any policy. The policy must not be set at such a scale that will threaten development to be in line with the Framework and guidance established in PPG. 11.21. H. Burtwistle & Son consider that the requirements in Policy 46 are not justified and does not provide an appropriate strategy. The Plan is its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 11.22. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 11.23. However, H. Burtwistle & Son consider that with increased flexibility in Part A in relation to NDSS, and a reduction of the target in part B to reflect evidence on need the Local Plan can be found sound. H. Burtwistle & Son will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 11.24. To overcome the objection and address soundness matters, the Council should: - Remove or increase the flexibility in part A of the policy which refers to national space standards - Remove or significantly reduce the requirement in Part B of the policy which requires 65% of all new homes to be accessible and adaptable.

Summary:
Part A of Policy 46 is seeking to implement national space standards without the requisite justification and evidence. Welcome the provision of new evidence on Housing Design Standards Policy. Consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The housebuilding industry knows its customers what type and size of housing is in demand. The use of Nationally Described Space Standards, can therefore impact on the delivery of affordable products, and can serve to stifle innovative design. Concerned that part B of this policy states that 65% of all new homes on housing developments of 10 or more units should be built to Part M4(2) of the Building Regulations i.e. accessible and adaptable dwellings. This is a significant increase in the requirement expressed in the earlier draft which required 30% of all housing to meet the standards of Building regulation requirement M4 (2). Generally supportive of providing homes for older and disabled persons. However, the SHMA, Economic Forecasts and Housing Needs Assessment and subsequent Housing Design Standards Policy Evidence paper unfortunately does not provide sufficient evidence and does not justify the Council’s position identified in the policy. The Housing Needs Assessment 2019, whilst referred to in the background paper and Local Plan was not available at the time of writing. H Burtwistle & Son does not dispute the population is ageing. However, it is unclear how this ageing population and potential future need reflects in the need for 65 percent of all new homes on sites of 10 or more dwellings to be provided at M4(2) standards. The optional higher M4(2) standard should only be introduced on a ”need to have” rather than a ”nice to have” basis. Although there is evidence of an ageing population having regard to the PPG this does not amount to the justification required for the Council to include the optional standard as specified in Policy 46. The Councils housing Design Standards Policy Evidence Paper evidences the ageing population, indicating that the percentage of over 65’s grows from 18.7% to 25%. Not all people over 65 will require a new home or adapted home. Indeed the paper recognises this in paragraph 2.53 where it states ”not all of this demand will be met through new builds, and existing stock will play some part”. The paper notes considers the level of people with Limiting Long Term Illnesses or Disabilities and expects just less than 40% of households will have a person with a long term health problem or disability, the majority of people with a long term health problem or disability are over 65 (60%). Thus there is not sufficient evidence to support a requirement of 65% based on evidence of need. It is important that the Council recognises the viability implications of requiring all houses to meet these enhanced standards. The whole plan viability evidence notes that all typologies in low value areas are unviable before the consideration of the impact of M4(2) and M4(3) standards, It also demonstrates that the application of M4(2) and M4(3) some typologies are unviable in medium value areas, when tested against a base assumption for affordable housing of 15% and not 23% as sought through Policy 8, Therefore, consider that this could result in stalled development where time is taken to debate viability issues. The Council must 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. Urge the Council to reduce the percentage requirements to ensure the deliverability of any policy. The policy must not be set at such a scale that will threaten development to be in line with the Framework and guidance established in PPG. Consider that with increased flexibility in Part A in relation to NDSS, and a reduction of the target in part B to reflect evidence on need the Local Plan can be found sound. To overcome the objection and address soundness matters, the Council should: - Remove or increase the flexibility in part A of the policy which refers to national space standards - Remove or significantly reduce the requirement in Part B of the policy which requires 65% of all new homes to be accessible and adaptable.

Response:
Refer to response for representation 02073 which raises similar issues.
2.48 As currently drafted our Client objects to part a) of Policy 46, which states "in order to ensure homes are large enough for the intended number of inhabitants, all new housing should meet the Nationally Described Space Standard as a minimum". 2.49 It does not appear that the Council have provided any justification as to why there is a need for the Nationally Described Space Standards to be introduced into the borough, and without this information, they can not seek to impose the standards. The Planning Practice Guidance is clear (ID 56-020), that "where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies". As part of this process, the Council need to demonstrate the need for larger units, that the introduction of the policy would not impact adversely upon viability, and that a transitional period may be required. 2.50 It does not appear that the Council have considered any of these factors and as such, our Client has concerns regarding the introduction of this policy as there does not appear to be any evidence which underpins the request. The policy should therefore be deleted as it is unsound and does not meet the tests of paragraph 35 of the Framework.

Summary:
Policy 46 - Housing Design Standards 1. Object to part (a) of the Policy 2. No justification for Nationally Described Space Standards to be introduced 3. No justification of the 'need' as described in the National guidance. 4. Introduction may have an adverse impact on viability. 5. Policy should be removed - does not comply with NPPF.

Response:
National policy in the NPPF and NPPG says LPA's can bring in optional housing standards where a need can be demonstrated and this has been viability tested. The Housing Standards evidence paper sets out the need and viability has been considered under the whole plan viability testing. The Council considers that the breadth of evidence presented in the evidence base paper highlights a strong need for the implementation of the NDSS within Doncaster.
Comment:

2.48 As currently drafted our Client objects to part a) of Policy 46, which states "in order to ensure homes are large enough for the intended number of inhabitants, all new housing should meet the Nationally Described Space Standard as a minimum". 2.49 It does not appear that the Council have provided any justification as to why there is a need for the Nationally Described Space Standards to be introduced into the borough, and without this information, they can not seek to impose the standards. The Planning Practice Guidance is clear (ID 56-020), that "where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies". As part of this process, the Council need to demonstrate the need for larger units, that the introduction of the policy would not impact adversely upon viability, and that a transitional period may be required. 2.50 It does not appear that the Council have considered any of these factors and as such, our Client has concerns regarding the introduction of this policy as there does not appear to be any evidence which underpins the request. The policy should therefore be deleted as it is unsound and does not meet the tests of paragraph 35 of the Framework.

Summary:

Policy 46 - Housing Design Standards 1. Object to part (a) of the Policy 2. No justification for Nationally Described Space Standards to be introduced 3. No justification of the 'need' as described in the National guidance. 4. Introduction may have an adverse impact on viability. 5. Policy should be removed - does not comply with NPPF.

Response:

National policy in the NPPF and NPPG says LPA's can bring in optional housing standards where a need can be demonstrated and this has been viability tested. The Housing Standards evidence paper sets out the need and viability has been considered under the whole plan viability testing. The Council considers that the breadth of evidence presented in the evidence base paper highlights a strong need for the implementation of the NDSS within Doncaster.
Framecourt Homes is concerned that part A of this policy is seeking to implement national space standards without the requisite justification and evidence. This policy looks for development to meet national spaces standards as a minimum (for residential). The enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a ‘need to have’ rather than a ‘nice to have’ basis. PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that ‘where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas. Need - evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. Viability - the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. Timing - there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’. Framecourt Homes welcomes the provision of new evidence on Housing Design Standards Policy. Framecourt Homes consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The housebuilding industry knows its customers what type and size of housing is in demand. The use of Nationally Described Space Standards, can therefore impact on the delivery of affordable products, and can serve to stifle innovative development. On NDSS Framecourt Homes would encourage the Council to recognise the larger land take such houses will require more land take. Therefore to deliver this would reduce the yield of sites and could have potential implications on the site yields identified by the Council on identified and allocated sites, ultimately resulting in the Council failing to meet their housing targets. Framecourt Homes note that the viability assessment has applied an average house size which is stated to reflect NDSS. However Framecourt Homes note that the mix tested does not reflect the Policy 8 requirement. Further the viability demonstrates that site typologies in low value areas are unviable based on the base assumptions, and viability is worsened with addition of other planning requirements of the Local Plan, and in some circumstances some typologies in medium value areas were demonstrated to be unviable. The 23% affordable housing requirement has not been tested in combination with all the requirements of Policy 46, Framecourt Homes consider that there needs to be greater flexibility in Policy 46 with regards to the use of NDSS. Framecourt Homes is also concerned that part B of this policy states that 65% of all new homes on housing developments of 10 or more units should be built to Part M4(2) of the Building Regulations i.e. accessible and adaptable dwellings. This is a significant increase in the requirement expressed in the earlier draft which required 30% of all housing to meet the standards of Building regulation requirement M4 (2). Framecourt Homes is generally supportive of providing homes for older and disabled persons. However, if the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG. The SHMA, Economic Forecasts and Housing Needs Assessment and subsequent Housing Design Standards Policy Evidence paper unfortunately does not provide sufficient evidence and does not justify the Council’s position identified in the policy. The Housing Needs Assessment 2019, whilst referred to in the background paper and Local Plan was not available at the time of writing. Framecourt Homes reserve the right to comment further when this is made available. It is important that if the Council are seeking the higher optional standards that the evidence is forthcoming. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. The Written Ministerial Statement dated 25th March 2015 stated that: The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG. NPPG states that where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to requirement M4(2) and/or M4(3) of the optional requirements in the Building Regulations and should not impose any additional information requirements (for instance provision of furnished layouts) or seek to determine compliance with these requirements, which is the role of the Building Control Body. This is to ensure that all parties have the clarity and certainty of knowing which standards they have to deal with and can factor these into their plans. For developers, this ensures that the design and procurement complications that previously arose from a series of different standards in different areas are avoided. It was recognised that it was not appropriate to apply Category 2 or 3 standards to all new homes as not all people who buy or move in to new homes need or wish to have such provision. Category 2 and 3 standards were therefore made “optional” with the position being that the case for requiring such standards in future new homes should be made through the adoption of local plan policies that have properly assessed the level of requirement for these standards in the local area, also taking into account other relevant factors including the impact on...
project viability. 11.18. Framecourt Homes does not dispute the population is ageing. However, it is unclear how this ageing population and potential future need reflects in the need for 65 percent of all new homes on sites of 10 or more dwellings to be provided at M4(2) standards. The optional higher M4(2) standard should only be introduced on a "need to have" rather than a "nice to have" basis. Although there is evidence of an ageing population having regard to the PPG this does not amount to the justification required for the Council to include the optional standard as specified in Policy 46. 11.19. The Councils housing Design Standards Policy Evidence Paper evidences the ageing population, indicating that the percentage of over 65’s grows from 18.7% to 25%. Not all people over 65 will require a new home or adapted home. Indeed the paper recognises this in paragraph 2.53 where it states "not all of this demand will be met through new builds, and existing stock will play some part". The paper notes considers the level of people with Limiting Long Term Illnesses or Disabilities and expects just less than 40% of households will have a person with a long term health problem or disability, the majority of people with a long term health problem or disability are over 65 (60%). Thus there is not sufficient evidence to support a requirement of 65% based on evidence of need. 11.20. It is important that the Council recognises the viability implications of requiring all houses to meet these enhanced standards. The whole plan viability evidence notes that all typologies in low value areas are unavailable before the consideration of the impact of M4(2) and M4(3) standards, it also demonstrates that the application of M4(2) and M4(3) some typologies are unavailable in medium value areas, when tested against a base assumption for affordable housing of 15% and not 23% as sought through Policy 8. Therefore, Framecourt Homes consider that this could result in stalled development where time is taken to debate viability issues. The Council must 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. Framecourt Homes would urge the Council to reduce the percentage requirements to ensure the deliverability of any policy. The policy must not be set at such a scale that will threaten development to be in line with the Framework and guidance established in PPG. 11.21. Framecourt Homes consider that the requirements in Policy 46 are not justified and does not provide an appropriate strategy. The Plan is its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 11.22. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 11.23. However, Framecourt Homes consider that with increased flexibility in Part A in relation to NDSS, and a reduction of the target in part B to reflect evidence on need the Local Plan can be found sound. Framecourt Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 11.24. To overcome the objection and address soundness matters, the Council should: - Remove or increase the flexibility in part A of the policy which refers to national space standards - Remove or significantly reduce the requirement in Part B of the policy which requires 65% of all new homes to be accessible and adaptable.

Summary:
Consider Policy 46 to be unsound. Concerned Part A seeks to implement national space standards without the requisite justification and evidence. The policy looks to meet national standards as a minimum, when the government intended these to be optional and need to have, not nice to have. PPG states Local Authorities should look at need, viability and timing. Whilst the new evidence is welcome, in some instances it will have an impact on viability, increase affordability issues and reduce customer choice. Some entry level houses may not meet space standards but are required to ensure those on lower incomes. The housebuilding industry knows its customers and the demand. Space standards can impact on affordability and stifle innovative design. The Council must understand that these requirements will lead to a larger land take up being required. This in turn will impact on site yields and could lead to the Council failing to meet it’s housing targets. The viability assessment assesses the design standards, but does not reflect the mix stipulated in Policy 8. Furthermore, the viability demonstrates the site typologies in low value areas are unavailable based on the assumptions, and viability is worsened with the addition of other planning requirements of the Local Plan. 23% affordable housing has not been tested in combination with the requirements of Policy 46. There needs to be greater flexibility with regards to the space standards. Also concerned that 46 B states that 65% of all new homes on sites of 10+ units should be build to M4(2) building regulations. This is a significant increase on the requirement in the previous draft (30%). Generally support providing housing for older and disabled people, however if the Council wishes to adopt higher optional standards, they should do so using the criteria in the PPG. The SHMA, PBA report and Housing Design Standards Evidence paper does not provide sufficient evidence and does not justify the position of the policy. Reserve the right to comment on the Housing Needs Assessment 2019 when available. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. Category M4 2 or 3 standards are optional with the position being the case for requiring such standards in future new homes should be made through the adoption of Local Plan policies that have properly assessed the level of requirement for these standards in the local area, also taking into account things such as project viability. It is unclear how the ageing population translates into a need to have 65% of new homes on sites 10+ units to be M4(2) standard. This should only be where needed, not just because it would be desired. The ageing population in itself is not sufficient justification. Not all people will require a new or adapted home. The paper notes considers the level of people with Limiting Long Term Illnesses or Disabilities and expects just less than 40% of households will have a person with a long term health problem or disability, the majority of people with a long term health problem or disability are over 65 (60%). Thus there is not sufficient evidence to support a requirement of 65% based on evidence of need. The viability implications must be realised. In low value areas, all typologies are unavailable before M4(2) and (3) is considered, and the application of both is unviable for some typologies in medium value areas against the 15% requirement. This could result in stalled development where time is taken to discuss viability. It is unrealistic to negotiate every site on one by one basis due to base line policy requirements being too high, and this will risk future housing delivery. The 5% of requirements should be reduced to ensure policy deliverability. Policy 46 not justified or in accordance with the framework or national policy. To overcome the objection and address soundness matters, the Council should: - Remove or increase the flexibility in part A of the policy which refers to national space standards - Remove or significantly reduce the requirement in Part B of the policy which requires 65% of all new homes to be accessible and adaptable.

Response:
Refer to response for representation 02073 which raises similar issues.
Avant Homes is concerned with Policy 46 and consider that the Policy 46 is unsound. Test of Soundness

12.1. Avant Homes is concerned with Policy 46 and consider that the Policy 46 is unsound. Test of Soundness 12.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 12.3. Avant Homes is concerned that part A of this policy is seeking to implement national space standards without the requisite justification and evidence. 12.4. This policy looks for development to meet national spaces standards as a minimum (for residential). The enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a ‘need to have’ basis rather than a ‘nice to have’ basis. 12.5. PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that ‘where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas’. 12.6. Need - evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. 12.7. Viability - the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. 12.8. Timing - there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’. 12.9. Avant Homes welcomes the provision of new evidence on Housing Design Standards Policy. Avant Homes consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The housebuilding industry knows its customers what type and size of housing is in demand. The use of Nationally Described Space Standards, can therefore impact on the delivery of affordable products, and can serve to stifle innovative design. 12.10. On NDSS Avant Homes would encourage the Council to recognise the larger land take such houses will require more land take. Therefore to deliver this would reduce the yield of sites and could have potential implications on the site yields identified by the Council on identified and allocated sites, ultimately resulting in the Council failing to meet their housing targets. 12.11. Avant Homes note that the viability assessment has applied an average house size which is stated to reflect NDSS, However Avant Homes note that the mix tested does not reflect the Policy 8 requirement. Further the viability demonstrates that site typologies in low value areas are unviable based on the base assumptions, and viability is worsened with addition of other planning requirements of the Local Plan, and in some circumstances some typologies in medium value areas were demonstrated to be unviable. The 23% affordable housing requirement have not been tested in combination with all the requirements of Policy 46, Avant Homes consider that there needs to be greater flexibility in Policy 46 with regards to the use of NDSS. 12.12. Avant Homes is also concerned that part B of this policy states that 65% of all new homes on housing developments of 10 or more units should be build to Part M4(2) of the Building Regulations i.e. accessible and adaptable dwellings. This is a significant increase in the requirement expressed in the earlier draft which required 30% of all housing to meet the standards of Building regulation requirement M4 (2). 12.13. Avant Homes is generally supportive of providing homes for older and disabled persons. However, if the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG. The SHMA, Economic Forecasts and Housing Needs Assessment and subsequent Housing Design Standards Policy Evidence paper unfortunately does not provide sufficient evidence and does not justify the Council’s position identified in the policy. The Housing Needs Assessment 2019, whilst referred to in the background paper and Local Plan was not available at the time of writing. Avant Homes reserve the right to comment further when this is made available. 12.14. It is important that if the Council are seeking the higher optional standards that the evidence is forthcoming. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. 12.15. The Written Ministerial Statement dated 25th March 2015 stated that: 12.16. The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG. 12.17. NPPG states that where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations and should not impose any additional information requirements (for instance provision of furnished layouts) or seek to determine compliance with these requirements, which is the role of the Building Control Body. This is to ensure that all parties have the clarity and certainty of knowing which standards they have to deal with and can factor these into their plans. For developers, this ensures that the design and procurement complications that previously arose from a series of different standards in different areas is not so obvious. It was recognised that it was not appropriate to apply Category 2 or 3 standards to all new homes as not all people who buy or move in to new homes need or wish to have such provision. Category 2 and 3 standards were therefore made “optional” with the position being that the case for requiring such standards in future new homes should be made through the adoption of local plan policies that have properly assessed the level of requirement for these standards in the local area, also taking into account other relevant factors including the impact on project viability. 12.18. Avant Homes does not dispute the population is ageing. However, it is unclear
how this ageing population and potential future need reflects in the need for 65 percent of all new homes on sites of 10 or more dwellings to be provided at M4(2) standards. The optional higher M4(2) standard should only be introduced on a "need to have" rather than a "nice to have" basis. Although there is evidence of an ageing population having regard to the PPG this does not amount to the justification required for the Council to include the optional standard as specified in Policy 46. 12.19. The Councils housing Design Standards Policy Evidence Paper evidences the ageing population, indicating that the percentage of over 65's grows from 18.7% to 25%. Not all people over 65 will require a new home or adapted home. Indeed the paper recognises this in paragraph 2.53 where it states "not all of this demand will be met through new builds, and existing stock will play some part". The paper notes considers the level of people with Limiting Long Term Illnesses or Disabilities and expects just less than 40% of households will have a person with a long term health problem or disability, the majority of people with a long term health problem or disability are over 65 (60%). Thus there is not sufficient evidence to support a requirement of 65% based on evidence of need. 12.20.

It is important that the Council recognises the viability implications of requiring all houses to meet these strengthened standards. The whole plan viability evidence notes that all typologies in low value areas are unviable before the consideration of the impact of M4(2) and M4(3) standards. It also demonstrates that the application of M4(2) and M4(3) some typologies are unviable in medium value area areas, when tested against a base assumption for affordable housing of 15% and not 23% as sought through Policy 8. Therefore, Avant Homes consider that this could result in stalled development where time is taken to debate viability issues. The Council must 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. Avant Homes would urge the Council to reduce the percentage requirements to ensure the deliverability of any policy. The policy must not be set at such a scale that will threaten development to be in line with the Framework and guidance established in PPG. 12.21. Avant Homes consider that the requirements in Policy 46 are not justified and does not provide an appropriate strategy. The Plan is its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 12.22. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 12.23. However, Avant Homes consider that with increased flexibility in Part A in relation to NDSS, and a reduction of the target in part B to reflect evidence on need the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 12.24. To overcome the objection and address soundness matters, the Council should: - Remove or increase the flexibility in part A of the policy which refers to national space standards - Remove or significantly reduce the requirement in Part B of the policy which requires 65% of all new homes to be accessible and adaptable.

Summary:
Concerned that part A of this policy is seeking to implement national space standards without the requisite justification and evidence. The policy looks to make these a minimum. The enhanced standards are intended by the government to be optional and can only be introduced where there is a clear need and they retain development viability - a need to have basis, not 'nice to have'. PPG identifies the evidence required to introduce such a policy. It should be justified by taking into account need, viability and timing. Welcome the provision of new evidence on Housing Design Standards. Consider that in some instances they may impact on viability, increase affordability issues and reduce customer choice. Some may not be able to meet these and provide 2 - 4 bed entry level homes to ensure those on lower incomes can afford a property with the bedrooms they need. House builders know their customers and the housing in demand. Space standards can impact on delivery of affordably products and stifle innovative design. Encourage the Council to recognise the larger land take such houses will require more land take.

Delivery of this will reduce the yield of sites and could have potential implications on the yields identified on sites and ultimately a failure to meet housing targets. The mixed tested in the viability assessment do not reflect the Policy 8 requirement. Further the viability demonstrates that site typologies in low value areas are unviable based on the base assumptions, and viability is worsened with addition of other planning requirements of the Local Plan, and in some circumstances some typologies in medium value areas were demonstrated to be unviable. 23% affordable requirement not tested with requirements of Policy 46 and their needs to be greater flexibility. Concerned about the significant increase in the requirements of Part B that 56% of new homes on developments of 10+ units should be built to M4 (2) standards. I the council want to adopt higher optional standards they should apply PPG criteria. No evidence sufficiently justifies the Council's position. Reserve right to comment on Housing Needs Assessment when public. If seeking the higher optional standards, the evidence should be forthcoming. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. A ministerial statement 25/03/15 stated that these should only be required through any new local plan if the address a clearly evidenced need and where viability impacts have been considered. PPG states where a policy is adopted to provide enhanced accessibility / adaptability they should only do so by reference to M4(2) or M4(3). This ensures clarity which aids procurement. Not everyone needs M4(2) or (3) standard homes, which is why this is optional. Unclear how an ageing population and potential future needs reflect the need for 65% of all new homes 10+ units to be M4(2) standards. Ageing population is not amount to justification required for the optional standard pf Policy 46. Not all people over 65 need a new home or an adaptable home, as the standards paper recognises (2.53). Not enough evidence for the 65% requirement. The Council must recognise the viability implications. The whole plan viability evidence notes that all typologies in low value areas are unviable before the consideration of the impact of M4(2) and M4(3) standards. It also demonstrates that the application of M4(2) and M4(3) some typologies are unviable in medium value areas, when tested against a base assumption for affordable housing of 15% and not 23% as sought through Policy 8. This could result in stalled development where viability needs to be debated. Urge the percentage to be reduced. The policy must not be set at such a scale that will threaten development to be in line with the Framework and guidance established in PPG. Policy not justified or an appropriate strategy. Could fail to deliver sustainable development. The plan is unsound. Proposed change: remove or increase the flexibility in part A of the policy which refers to national space standards, and remove or significantly reduce the requirement in Part B of the policy which requires 65% of all new homes to be accessible and adaptable.

Response:
Refer to response for representation 02073 which raises similar issues.
Policy 46: Housing Design Standards

Chapter 12: Design & the Built Environment

Test of Soundness: Positively prepared

Consistent with national

12.1. Avant Homes is concerned with Policy 46 and consider that the Policy 46 is unsound. Test of Soundness 12.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistent with National Policy

Policy 46: Housing Design Standards

Justification 12.3. Avant Homes is concerned that part A of this policy is seeking to implement national space standards without the requisite justification and evidence. 12.4. This policy looks for development to meet national space standards as a minimum (for residential). The enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a ‘need to have’ rather than a ‘nice to have’ basis. 12.5. PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that ‘where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas. 12.6. Need - evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. 12.7. Viability - the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. 12.8. Timing - there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’. 12.9. Avant Homes welcomes the provision of new evidence on Housing Design Standards Policy. Avant Homes consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The housebuilding industry knows its customers what type and size of housing is in demand. The use of Nationally Described Space Standards, can therefore impact on the delivery of affordable products, and can serve to stifle innovative design. 12.10. On NDSS Avant Homes would encourage the Council to recognise the larger land take such houses will require more land take. Therefore to deliver this would reduce the yield of sites and could have potential implications on the site yields identified by the Council on identified and allocated sites, ultimately resulting in the Council failing to meet their housing targets. 12.11. Avant Homes note that the viability assessment has applied an average house size which is stated to reflect NDSS. However Avant Homes note that the mix tested does not reflect the Policy 8 requirement. Further the viability demonstrates that site typologies in low value areas are unviable based on the base assumptions, and viability is worsened with addition of other planning requirements of the Local Plan, and in some circumstances some typologies in medium value areas were demonstrated to be unviable. The 23% affordable housing requirement have not been tested in combination with all the requirements of Policy 46, Avant Homes consider that there needs to be greater flexibility in Policy 46 with regards to the use of NDSS. 12.12. Avant Homes is also concerned that part B of this policy states that 65% of all new homes on housing developments of 10 or more units should be built to Part M4(2) of the Building Regulations i.e. accessible and adaptable dwellings. This is a significant increase in the requirement expressed in the earlier draft which required 30% of all housing to meet the standards of Building regulation requirement M4 (2). 12.13. Avant Homes is generally supportive of providing homes for older and disabled persons. However, if the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG. The SHMA, Economic Forecasts and Housing Needs Assessment and subsequent Housing Design Standards Policy Evidence paper unfortunately does not provide sufficient evidence and does not justify the Council’s position identified in the policy. The Housing Needs Assessment 2019, whilst referred to in the background paper and Local Plan was not available at the time of writing. Avant Homes reserve the right to comment further when this is made available. 12.14. It is important that if the Council are seeking the higher optional standards that the evidence is forthcoming. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. 12.15. The Written Ministerial Statement dated 25th March 2015 stated that: 12.16. The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG. 12.17. NPPG states that where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations and should not impose any additional information requirements (for instance provision of furnished layouts) or seek to determine compliance with these requirements, which is the role of the Building Control Body. This is to ensure that all parties have the clarity and certainty of knowing which standards they have to deal with and can factor these into their plans. For developers, this ensures that the design and procurement implications that previously arose from a series of different standards in different areas are consistent. It was recognised that it was not appropriate to apply Category 2 or 3 standards to all new homes as not all people who buy or move in to new homes need or wish to have such provision. Category 2 and 3 standards were therefore made “optional” with the position being that the case for requiring such standards in future new homes should be made through the adoption of local plan policies that have properly assessed the level of requirement for these standards in the local area, also taking into account other relevant factors including the impact on project viability. 12.18. Avant Homes does not dispute the population is ageing. However, it is unclear
how this ageing population and potential future need reflects in the need for 65 percent of all new homes on sites of 10 or more dwellings to be provided at M4(2) standards. The optional higher M4(2) standard should only be introduced on a "need to have" rather than a "nice to have" basis. Although there is evidence of an ageing population having regard to the PPG this does not amount to the justification required for the Council to include the optional standard as specified in Policy 46. 12.19. The Councils housing Design Standards Policy Evidence Paper evidences the ageing population, indicating that the percentage of over 65’s grows from 18.7% to 25%, Not all people over 65 will require a new home or adapted home. Indeed the paper recognises this in paragraph 2.53 where it states "not all of this demand will be met through new builds, and existing stock will play some part". The paper notes considers the level of people with Limiting Long Term Illnesses or Disabilities and expects just less than 40% of households will have a person with a long term health problem or disability, the majority of people with a long term health problem or disability are over 65 (60%). Thus there is not sufficient evidence to support a requirement of 65% based on evidence of need. 12.20. It is important that the Council recognises the viability implications of requiring all houses to meet these enhanced standards. The whole plan viability evidence notes that all typologies in low value areas are unviable before the consideration of the impact of M4(2) and M4(3) standards, It also demonstrates that the application of M4(2) and M4(3) some typologies are unviable in medium value areas, when tested against a base assumption for affordable housing of 15% and not 23% as sought through Policy 8, Therefore, Avant Homes consider that this could result in stalled development where time is taken to debate viability issues. The Council must 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. Avant Homes would urge the Council to reduce the percentage requirements to ensure the deliverability of any policy. The policy must not be set at such a scale that will threaten development to be in line with the Framework and guidance established in PPG. 12.21. Avant Homes consider that the requirements in Policy 46 are not justified and does not provide an appropriate strategy. The Plan is its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 12.22. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 12.23. However, Avant Homes consider that with increased flexibility in Part A in relation to NDSS, and a reduction of the target in part B to reflect evidence on need the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 12.24. To overcome the objection and address soundness matters, the Council should: - Remove or increase the flexibility in part A of the policy which refers to national space standards - Remove or significantly reduce the requirement in Part B of the policy which requires 65% of all new homes to be accessible and adaptable.

Summary:

Concerned that part A of this policy is seeking to implement national space standards without the requisite justification and evidence. The policy looks to make these a minimum. The enhanced standards are intended by the government to be optional and can only be introduced where there is a clear need and they retain development viability - a 'need to have' basis, not 'nice to have'. PPG identifies the evidence required to introduce such a policy. It should be justified by taking into account need, viability and timing. Welcome the provision of new evidence on Housing Design Standards. Consider that in some instances they may impact on viability, increase affordability issues and reduce customer choice. Some may not be able to meet these and provide 2 - 4 bed entry level homes to ensure those on lower incomes can afford a property with the bedrooms they need. House builders know their customers and the housing in demand. Space standards can impact on delivery of affordably products and stifle innovative design. Encourage the Council to recognise the larger land take such houses will require more land take. Delivery of this will reduce the yield of sites and could have potential implications on the yields identified on sites and ultimately a failure to meet housing targets. The mix tested in the viability assessment do not reflect the Policy 8 requirement. Further the viability demonstrates that site typologies in low value areas are unviable based on the base assumptions, and viability is worsened with addition of other planning requirements of the Local Plan, and in some circumstances some typologies in medium value areas were demonstrated to be unviable. 23% affordable requirement not tested with requirements of Policy 46 and their needs to be greater flexibility. Concerned about the significant increase in new requirements of Part B that 56% of new homes on developments of 10+ units should be built to M4 (2) standards. I the council want to adopt higher optional standards they should apply PPG criteria. No evidence sufficiently justifies the Council's position. Reserve right to comment on Housing Needs Assessment when public. If seeking the higher optional standards, the evidence should be forthcoming. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. A ministerial statement 25/03/15 stated that these should only be required through any new local plan if the address a clearly evidenced need and where viability impacts have been considered. PPG states where a policy is adopted to provide enhanced accessibility / adaptability they should only do so by reference to M4(2) or M4(3). This ensures clarity which aids procurement. Not everyone needs M4(2) or (3) standard homes, which is why this is optional. Unclear how an ageing population and potential future need reflects the need for 65% of all new homes 10+ units to be M4(2) standards. Ageing population is not amount to justification required for the optional standard pf Policy 46. Not all people over 65 need a new home or an adaptable home, as the standards paper recognises (2.53). Not enough evidence for the 65% requirement. The Council must recognise the viability implications. The whole plan viability evidence notes that all typologies in low value areas are unviable before the consideration of the impact of M4(2) and M4(3) standards, It also demonstrates that the application of M4(2) and M4(3) some typologies are unviable in medium value areas, when tested against a base assumption for affordable housing of 15% and not 23% as sought through Policy 8. This could result in stalled development where viability needs to be debated. Urge the percentage to be reduced. The policy must not be set at such a scale that will threaten development to be in line with the Framework and guidance established in PPG. Policy not justified or an appropriate strategy. Could fail to deliver sustainable development. The plan is unsound. Proposed change: remove or increase the flexibility in part A of the policy which refers to national space standards, and remove or significantly reduce the requirement in Part B of the policy which requires 65% of all new homes to be accessible and adaptable.

Response:

Refer to response for representation 02073 which raises similar issues.
12.1. Avant Homes is concerned with Policy 46 and consider that the Policy 46 is unsound. Test of Soundness  12.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about?  X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification  12.3. Avant Homes is concerned that part A of this policy is seeking to implement national space standards without the requisite justification and evidence.  12.4. This policy looks for development to meet national space standards as a minimum (for residential). The enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis. 12.5. PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas. 12.6. Need - evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.  12.7. Viability - the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. 12.8. Timing - there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’.  12.9. Avant Homes welcomes the provision of new evidence on Housing Design Standards Policy. Avant Homes consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that some lower incomes can afford a property which has their required number of bedrooms. The housebuilding industry knows its customers what type and size of housing is in demand. The use of Nationally Described Space Standards, can therefore impact on the delivery of affordable products, and can serve to stifle innovative design. 12.10. On NDSS Avant Homes would encourage the Council to recognise the larger land take such houses will require more land take. Therefore to deliver this would reduce the yield of sites and could have potential implications on the site yields identified by the Council on identified and allocated sites, ultimately resulting in the Council failing to meet their housing targets. 12.11. Avant Homes note that the viability assessment has applied an average house size which is stated to reflect NDSS, However Avant Homes note that the mix tested does not reflect the Policy 8 requirement. Further the viability demonstrates that site typologies in low value areas are unviable based on the base assumptions, and viability is worsened with addition of other planning requirements of the Local Plan, and in some circumstances some typologies in medium value areas were demonstrated to be unviable. The 23% affordable housing requirement has not been tested in combination with all the requirements of Policy 46, Avant Homes consider that there needs to be greater flexibility in Policy 46 with regards to the use of NDSS.  12.12. Avant Homes is also concerned that part B of this policy states that 65% of all new homes on housing developments of 10 or more units should be built to Part M4(2) of the Building Regulations i.e. accessible and adaptable dwellings. This is a significant increase in the requirement expressed in the earlier draft which required 30% of all housing to meet the standards of Building regulation requirement M4 (2). 12.13. Avant Homes is generally supportive of providing homes for older and disabled persons. However, if the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG. The SHMA, Economic Forecasting and Housing Needs Assessment and subsequent Housing Design Standards Policy Evidence paper unfortunately does not provide sufficient evidence and does not justify the Council’s position identified in the policy. The Housing Needs Assessment 2019, whilst referred to in the background paper and Local Plan was not available at the time of writing. Avant Homes reserve the right to comment further when this is made available. 12.14. It is important that if the Council are seeking the higher optional standards that the evidence is forthcoming. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. 12.15. The Written Ministerial Statement dated 25th March 2015 stated that: 12.16. The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG. 12.17. NPPG states that where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations and should not impose any additional information requirements (for instance provision of furnished layouts) or seek to determine compliance with these requirements, which is the role of the Building Control Body. This is to ensure that all parties have the clarity and certainty of knowing which standards they have to deal with and can factor these into their plans. For developers, this ensures that the design and procurement complications that previously arose from a series of different standards in different areas are avoided. It was recognised that it was not appropriate to apply Category 2 or 3 standards to all new homes as not all people who buy or move in to new homes need or wish to have such provision. Category 2 and 3 standards were therefore made "optional" with the position being that the case for requiring such standards in future new homes should be made through the adoption of local plan policies that have properly assessed the level of requirement for these standards in the local area, also taking into account other relevant factors including the impact on project viability. 12.18. Avant Homes does not dispute the population is ageing. However, it is unclear
how this ageing population and potential future need reflects in the need for 65 percent of all new homes on sites of 10 or more dwellings to be provided at M4(2) standards. The optional higher M4(2) standard should only be introduced on a "need to have" rather than a "nice to have" basis. Although there is evidence of an ageing population having regard to the PPG this does not amount to the justification required for the Council to include the optional standard as specified in Policy 46. 12.19. The Councils housing Design Standards Policy Evidence Paper evidences the ageing population, indicating that the percentage of over 65's grows from 18.7% to 25%. Not all people over 65 will require a new home or adapted home. Indeed the paper recognises this in paragraph 2.53 where it states "not all of this demand will be met through new builds, and existing stock will play some part". The paper notes considers the level of people with Limiting Long Term Illnesses or Disabilities and expects just less than 40% of households will have a person with a long term health problem or disability, the majority of people with a long term health problem or disability are over 65 (60%). Thus there is not sufficient evidence to support a requirement of 65% based on evidence of need. 12.20. It is important that the Council recognises the viability implications of requiring all houses to meet these enhanced standards. The whole plan viability evidence notes that all typologies in low value areas are unviable before the consideration of the impact of M4(2) and M4(3) standards. It also demonstrates that the application of M4(2) and M4(3) some typologies are unviable in medium value areas, when tested against a base assumption for affordable housing of 15% and not 23% as sought through Policy 8, Therefore, Avant Homes consider that this could result in stalled development where time is taken to debate viability issues. The Council must 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. Avant Homes would urge the Council to reduce the percentage requirements to ensure the deliverability of any policy. The policy must not be set at such a scale that will threaten development to be in line with the Framework and guidance established in PPG. 12.21. Avant Homes consider that the requirements in Policy 46 are not justified and does not provide an appropriate strategy. The Plan is its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 12.22. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 12.23. However, Avant Homes consider that with increased flexibility in Part A in relation to NDSS, and a reduction of the target in part B to reflect evidence on need the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 12.24. To overcome the objection and address soundness matters, the Council should: - Remove or increase the flexibility in part A of the policy which refers to national space standards - Remove or significantly reduce the requirement in Part B of the policy which requires 65% of all new homes to be accessible and adaptable.

Summary:
Concerned that part A of this policy is seeking to implement national space standards without the requisite justification and evidence. The policy looks to make these a minimum. The enhanced standards are intended by the government to be optional and can only be introduced where there is a clear need and they retain development viability - a "need to have" basis, not 'nice to have'. PPG identifies the evidence required to introduce such a policy. It should be justified by taking into account need, viability and timing. Welcome the provision of new evidence on Housing Design Standards. Consider that in some instances they may impact on viability, increase affordability issues and reduce customer choice. Some may not be able to meet these and provide 2 - 4 bed entry level homes to ensure those on lower incomes can afford a property with the bedrooms they need. House builders know their customers and the housing in demand. Space standards can impact on delivery of affordably products and stifle innovative design. Encourage the Council to recognise the larger land take such houses will require more land take. Delivery of this will reduce the yield of sites and could have potential implications on the yields identified on sites and ultimately a failure to meet housing targets. The mix tested in the viability assessment do not reflect the Policy 8 requirement. Further the viability demonstrates that site typologies in low value areas are unviable based on the base assumptions, and viability is worsened with addition of other planning requirements of the Local Plan, and in some circumstances some typologies in medium value areas were demonstrated to be unviable. 23% affordable requirement not tested with requirements of Policy 46 and their needs to be greater flexibility. Concerned about the significant increase in the requirements of Part B that 56% of new homes on developments of 10+ units should be built to M4 (2) standards. I the council want to adopt higher optional standards they should apply PPG criteria. No evidence sufficiently justifies the Council's position. Reserve right to comment on Housing Needs Assessment when public. If seeking the higher optional standards, the evidence should be forthcoming. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. A ministerial statement 25/03/15 stated that these should only be required through any new local plan if the address a clearly evidenced need and where viability impacts have been considered. PPG states where a policy is adopted to provide enhanced accessibility / adaptability they should only do so by reference to M4(2) or M4(3). This ensures clarity which aids procurement. Not everyone needs M4(2) or (3) standard homes, which is why this is optional. Unclear how an ageing population and potential future needs reflect the need for 65% of all new homes 10+ units to be M4(2) standards. Ageing population is not amount to justification required for the optional standard pf Policy 46. Not all people over 65 need a new home or an adaptable home, as the standards paper recognises (2.53). Not enough evidence for the 65% requirement. The Council must recognise the viability implications. The whole plan viability evidence notes that all typologies in low value areas are unviable before the consideration of the impact of M4(2) and M4(3) standards. It also demonstrates that the application of M4(2) and M4(3) some typologies are unviable in medium value areas, when tested against a base assumption for affordable housing of 15% and not 23% as sought through Policy 8. This could result in stalled development where viability needs to be debated. Urge the percentage to be reduced. The policy must not be set at such a scale that will threaten development to be in line with the Framework and guidance established in PPG. Policy not justified or an appropriate strategy. Could fail to deliver sustainable development. The plan is unsound. Proposed change: remove or increase the flexibility in part A of the policy which refers to national space standards, and remove or significantly reduce the requirement in Part B of the policy which requires 65% of all new homes to be accessible and adaptable.

Response:
Refer to response for representation 02073 which raises similar issues.
13.1. Avant Homes is concerned with Policy 46 and consider that the Policy 46 is unsound. Test of Soundness 13.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Consistent with National Policy: Justification 13.3. Avant Homes is concerned that part A of this policy is seeking to implement national space standards without the requisite justification and evidence. 13.4. This policy looks for development to meet national standards as a minimum (for residential). The enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a ‘need to have’ rather than a ‘nice to have’ basis. 13.5. PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that ‘where a need for internal space standards is identified, local planning authorities should provide justification for requiringinternal space policies. Local planning authorities should take account of the following areas. 13.6. Need - evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. 13.7. Viability - the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. 13.8. Timing - there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’. 13.9. Avant Homes welcomes the provision of new evidence on Housing Design Standards Policy. Avant Homes consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The housebuilding industry knows its customers what type and size of housing is in demand. The use of Nationally Described Space Standards, can therefore impact on the delivery of affordable products, and can serve to stifle innovative design. 13.10. On NDSS Avant Homes would encourage the Council to recognise the larger land take such houses will require more land take. Therefore to deliver this would reduce the yield of sites and could have potential implications on the site yields identified by the Council on identified and allocated sites, ultimately resulting in the Council failing to meet their housing targets. 13.11. Avant Homes note that the viability assessment has applied an average house size which is stated to reflect NDSS, However Avant Homes note that the mix tested does not reflect the Policy 8 requirement. Further the viability demonstrates that site typologies in low value areas are unviable based on the base assumptions, and viability is worsened with addition of other planning requirements of the Local Plan, and in some circumstances some typologies in medium value areas were demonstrated to be unviable. The 23% affordable housing requirement have not been tested in combination with all the requirements of Policy 46, Avant Homes consider that there needs to be greater flexibility in Policy 46 with regards to the use of NDSS. 13.12. Avant Homes is also concerned that part B of this policy states that 65% of all new homes on housing developments of 10 or more units should be built to Part M4(2) of the Building Regulations i.e. accessible and adaptable dwellings. This is a significant increase in the requirement expressed in the earlier draft which required 30% of all housing to meet the standards of Building regulation requirement M4 (2). 13.13. Avant Homes is generally supportive of providing homes for older and disabled persons. However, if the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG. The SHMA, Economic Forecasts and Housing Needs Assessment and subsequent Housing Design Standards Policy Evidence paper unfortunately does not provide sufficient evidence and does not justify the Council’s position identified in the policy. The Housing Needs Assessment 2019, whilst referred to in the background paper and Local Plan was not available at the time of writing. Avant Homes reserve the right to comment further when this is made available. 13.14. It is important that if the Council are seeking the higher optional standards that the evidence is forthcoming. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. 13.15. The Written Ministerial Statement dated 25th March 2015 stated that: 13.16. The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG. 13.17. NPPG states that where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations and should not impose any additional information requirements (for instance provision of furnished layouts) or seek to determine compliance with these requirements, which is the role of the Building Control Body. This is to ensure that all parties have the clarity and certainty of knowing which standards they have to deal with and can factor these into their plans. For developers, this ensures that the design and procurement complications that previously arose from a series of different standards in different areas are avoided. It was recognised that it was not appropriate to apply Category 2 or 3 standards to all new homes as not all people who buy or move in to new homes need or wish to have such provision. Category 2 and 3 standards were therefore made “optional” with the position being that the case for requiring such standards in future new homes should be made through the adoption of local plan policies that have properly assessed the level of requirement for these standards in the local area, also taking into account other relevant factors including the impact on project viability. 13.18. Avant Homes does not dispute the population is ageing. However, it is unclear
how this ageing population and potential future need reflects in the need for 65 percent of all new homes on sites of 10 or more dwellings to be provided at M4(2) standards. The optional higher M4(2) standard should only be introduced on a "need to have" rather than a "nice to have" basis. Although there is evidence of an ageing population having regard to the PPG this does not amount to the justification required for the Council to include the optional standard as specified in Policy 46. 

13.19. The Councils housing Design Standards Policy Evidence Paper evidences the ageing population, indicating that the percentage of over 65’s grows from 18.7% to 25%. Not all people over 65 will require a new home or adapted home. Indeed the paper recognises this in paragraph 2.53 where it states "not all of this demand will be met through new builds, and existing stock will play some part". The paper notes considers the level of people with Limiting Long Term Illnesses or Disabilities and expects just less than 40% of households will have a person with a long term health problem or disability, the majority of people with a long term health problem or disability are over 65 (60%). Thus there is not sufficient evidence to support a requirement of 65% based on evidence of need. 

13.20. It is important that the Council recognises the viability implications of requiring all houses to meet these enhanced standards. The whole plan viability evidence notes that all typologies in low value areas are unviable before the consideration of the impact of M4(2) and M4(3) standards, It also demonstrates that the application of M4(2) and M4(3) some typologies are unviable in medium value areas, when tested against a base assumption for affordable housing of 15% and not 23% as sought through Policy 8. Therefore, Avant Homes consider that this could result in stalled development where time is taken to debate viability issues. The Council must 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. Avant Homes would urge the Council to reduce the percentage requirements to ensure the deliverability of any policy. The policy must not be set at such a scale that will threaten development to be in line with the Framework and guidance established in PPG. 

13.21. Avant Homes consider that the requirements in Policy 46 are not justified and does not provide an appropriate strategy. The Plan is its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 

13.22. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 

13.23. However, Avant Homes consider that with increased flexibility in Part A in relation to NDSS, and a reduction of the target in part B to reflect evidence on need the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 

13.24. To overcome the objection and address soundness matters, the Council should: - Remove or increase the flexibility in part A of the policy which refers to national space standards. - Remove or significantly reduce the requirement in part B of the policy which requires 65% of all new homes to be accessible and adaptable homes.

Summary:

Policy 46 - Housing Design Standards. 1. Policy could impact on deliverability and viability. 2. Part A - national space Standards - no evidence to justify implementation. 3. Remove or increase flexibility 4. Part B - remove or reduce the requirement (65% of all new homes to be accessible/adaptable).

Response:

Refer to response for representation 02073 which raises similar issues.
11.1. Priority Space is concerned with Policy 46 and consider that the Policy 46 is unsound. Test of Soundness 11.2. Priority Space considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy. Justification 11.3. Priority Space is concerned that part A of this policy is seeking to implement national space standards without the requisite justification and evidence. 11.4. This policy looks for development to meet national spaces standards as a minimum (for residential). The enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis. 11.5. PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas. 11.6. Need - evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. 11.7. Viability - the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. 11.8. Timing - there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'. 11.9. Priority Space welcomes the provision of new evidence on Housing Design Standards Policy. Priority Space consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The housebuilding industry knows its customers what type and size of housing is in demand. The use of Nationaly Described Space Standards, can therefore impact on the delivery of affordable products, and can serve to stifle innovative design. 11.10. On NDSS Priority Space would encourage the Council to recognise the larger land take such houses will require more land take. Therefore to deliver this would reduce the yield of sites and could have potential implications on the site yields identified by the Council on identified and allocated sites, ultimately resulting in the Council failing to meet their housing targets. 11.11. Priority Space note that the viability assessment has applied an average house size which is stated to reflect NDSS, However Priority Space note that the mix tested does not reflect the Policy 8 requirement. Further the viability demonstrates that site typologies in low value areas are unviable based on the base assumptions, and viability is worsened with addition of other planning requirements of the Local Plan, and in some circumstances some typologies in medium value areas were demonstrated to be unviable. The 23% affordable housing requirement has not been tested in combination with all the requirements of Policy 46, Priority Space consider that there needs to be greater flexibility in Policy 46 with regards to the use of NDSS. 11.12. Priority Space is also concerned that part B of this policy states that 65% of all new homes on housing developments of 10 or more units should be built to Part M4(2) of the Building Regulations i.e. accessible and adaptable dwellings. This is a significant increase in the requirement expected in the earlier draft which required 30% of all housing to meet the standards of Building regulation requirement M4 (2). 11.13. Priority Space is generally supportive of providing homes for older and disabled persons. However, if the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG. The SHMA, Economic Forecasts and Housing Needs Assessment and subsequent Housing Design Standards Policy Evidence paper unfortunately does not provide sufficient evidence and does not justify the Council’s position identified in the policy. The Housing Needs Assessment 2019, whilst referred to in the background paper and Local Plan was not available at the time of writing. Priority Space reserve the right to comment further when this is made available. 11.14. It is important that if the Council are seeking the higher optional standards that the evidence is forthcoming. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. 11.15. The Written Ministerial Statement dated 25th March 2015 stated that: 11.16. The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG. 11.17. NPPG states that where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations and should not impose any additional information requirements (for instance provision of furnished layouts) or seek to determine compliance with these requirements, which is the role of the Building Control Body. This is to ensure that all parties have the clarity and certainty of knowing which standards they have to deal with and can factor these into their plans. For developers, this ensures that the design and procurement complications that previously arose from a series of different standards in different areas are avoided. It was recognised that it was not appropriate to apply Category 2 or 3 standards to all new homes as not all people who buy or move in to new homes need or wish to have such provision. Category 2 and 3 standards were therefore made "optional" with the position being that the case for requiring such standards in future new homes should be made through the adoption of local plan policies that have properly assessed the level of requirement for these standards in the local area, also taking into account other relevant factors including the impact on project viability. 11.18. Priority Space does not dispute the population is ageing. However, it is unclear
how this ageing population and potential future need reflects in the need for 65 percent of all new homes on sites of 10 or more dwellings to be provided at M4(2) standards. The optional higher M4(2) standard should only be introduced on a "need to have" rather than a "nice to have" basis. Although there is evidence of an ageing population having regard to the PPG this does not amount to the justification required for the Council to include the optional standard as specified in Policy 46. 11.19. The Councils housing Design Standards Policy Evidence Paper evidences the ageing population, indicating that the percentage of over 65’s grows from 18.7% to 25%, Not all people over 65 will require a new home or adapted home. Indeed the paper recognises this in paragraph 2.53 where it states "not all of this demand will be met through new builds, and existing stock will play some part". The paper notes considers the level of people with Limiting Long Term Illnesses or Disabilities and expects just less than 40% of households will have a person with a long term health problem or disability, the majority of people with a long term health problem or disability are over 65 (60%). Thus there is not sufficient evidence to support a requirement of 65% based on evidence of need. 11.20. It is important that the Council recognises the viability implications of requiring all houses to meet these enhanced standards. The whole plan viability evidence notes that all typologies in low value areas are unviable before the consideration of the impact of M4(2) and M4(3) standards, It also demonstrates that the application of M4(2) and M4(3) some typologies are unviable in medium value areas, when tested against a base assumption for affordable housing of 15% and not 23% as sought through Policy 8. Therefore, Priority Space consider that this could result in stalled development where time is taken to debate viability issues. The Council must 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. Priority Space would urge the Council to reduce the percentage requirements to ensure the deliverability of any policy. The policy must not be set at such a scale that will threaten development to be in line with the Framework and guidance established in PPG. 11.21. Priority Space consider that the requirements in Policy 46 are not justified and does not provide an appropriate strategy. The Plan is its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 11.22. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 11.23. However, Priority Space consider that with increased flexibility in Part A in relation to NDSS, and a reduction of the target in part B to reflect evidence on need the Local Plan can be found sound. Priority Space will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 11.24. To overcome the objection and address soundness matters, the Council should: - Remove or increase the flexibility in part A of the policy which refers to national space standards - Remove or significantly reduce the requirement in Part B of the policy which requires 65% of all new homes to be accessible and adaptable.

Summary:

Policy 46 - Housing Design Standards. 1. Policy could impact on deliverability and viability. 2. Part A - national space Standards - no evidence to justify implementation. 3. Remove or increase flexibility. 4. Part B - remove or reduce the requirement (65% of all new homes to be accessible/adaptable).

Response:

Refer to response for representation 02073 which raises similar issues.
Firsure is concerned that part A of this policy is seeking to implement national space standards without the requisite justification and evidence. 11.4. This policy looks for development to meet national spaces standards as a minimum (for residential). The enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a ‘need to have’ rather than a ‘nice to have’ basis.

11.5. PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that ‘where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas. 11.6. Need - evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. 11.7. Viability - the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. 11.8. Timing - there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’.

11.9. Firsure welcomes the provision of new evidence on Housing Design Standards Policy. Firsure consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The housebuilding industry knows its customers what type and size of housing is in demand. The use of Nationally Described Space Standards, can therefore impact on the delivery of affordable products, and can serve to stifle innovative design. 11.10. On NDSS Firsure would encourage the Council to recognise the larger land take such houses will require more land take. Therefore to deliver this would reduce the yield of sites and could have potential implications on the site yields identified by the Council on identified and allocated sites, ultimately resulting in the Council failing to meet their housing targets. 11.11. Firsure note that the viability assessment has applied an average house size which is stated to reflect NDSS. However Firsure note that the mix tested does not reflect the Policy 8 requirement. Further the viability demonstrates that site typologies in low value areas are unviable based on the base assumptions, and viability is worsened with addition of other planning requirements of the Local Plan, and in some circumstances some typologies in medium value areas were demonstrated to be unviable. The 23% affordable housing requirement has not been tested in combination with all the requirements of Policy 46, Firsure consider that there needs to be greater flexibility in Policy 46 with regards to the use of NDSS. 11.12. Firsure is also concerned that part B of this policy states that 65% of all new homes on housing developments of 10 or more units should be built to Part M4(2) of the Building Regulations i.e. accessible and adaptable dwellings. This is a significant increase in the requirement expressed in the earlier draft which required 30% of all housing to meet the standards of Building regulation requirement M4(2). 11.13. Firsure is generally supportive of providing homes for older and disabled persons. However, if the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG. The SHMA, Economic Forecasts and Housing Needs Assessment and subsequent Housing Design Standards Policy Evidence paper unfortunately does not provide sufficient evidence and does not justify the Council's position identified in the policy. The Housing Needs Assessment 2019, whilst referred to in the background paper and Local Plan was not available at the time of writing. Firsure reserve the right to comment further when this is made available. 11.14. It is important that if the Council are seeking the higher optional standards that the evidence is forthcoming. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. 11.15. The Written Ministerial Statement dated 25th March 2015 stated that: 11.16. The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG. 11.17. NPPG states that where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations and should not impose any additional requirements (for instance provision of furnished layouts) or seek to determine compliance with these requirements, which is the role of the Building Control Body. This is to ensure that all parties have the clarity and certainty of knowing which standards they have to deal with and can factor these into their plans. For developers, this ensures that the design and procurement complications that previously arose from a series of different standards in different areas are avoided. It was recognised that it was not appropriate to apply Category 2 or 3 standards to all new homes as not all people who buy or move in to new homes need or wish to have such provision. Category 2 and 3 standards were therefore made "optional" with the position being that the case for requiring such standards in future new homes should be made through the adoption of local plan policies that have properly assessed the level of requirement for these standards in the local area, also taking into account other relevant factors including the impact on project viability. 11.18. Firsure does not dispute the population is ageing. However, it is unclear how this ageing population and potential future need reflects in the need for 65 percent of all new
homes on sites of 10 or more dwellings to be provided at M4(2) standards. The optional higher M4(2) standard should only be introduced on a "need to have" rather than a "nice to have" basis. Although there is evidence of an ageing population having regard to the PPG this does not amount to the justification required for the Council to include the optional standard as specified in Policy 46. 11.19. The Councils housing Design Standards Policy Evidence Paper evidences the ageing population, indicating that the percentage of over 65's grows from 18.7% to 25%, Not all people over 65 will require a new home or adapted home. Indeed the paper recognises this in paragraph 2.53 where it states "not all of this demand will be met through new builds, and existing stock will play some part". The paper notes considers the level of people with Limiting Long Term Illnesses or Disabilities and expects just less than 40% of households will have a person with a long term health problem or disability, the majority of people with a long term health problem or disability are over 65 (60%). Thus there is not sufficient evidence to support a requirement of 65% based on evidence of need. 11.20. It is important that the Council recognises the viability implications of requiring all houses to meet these enhanced standards. The whole plan viability evidence notes that all typologies in low value areas are unviable before the consideration of the impact of M4(2) and M4(3) standards. It also demonstrates that the application of M4(2) and M4(3) some typologies are unviable in medium value areas, when tested against a base assumption for affordable housing of 15% and not 23% as sought through Policy 8. Therefore, Firsure consider that this could result in stalled development where time is taken to debate viability issues. The Council must 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. Firsure would urge the Council to reduce the percentage requirements to ensure the deliverability of any policy. The policy must not be set at such a scale that will threaten development to be in line with the Framework and guidance established in PPG. 11.21. Firsure consider that the requirements in Policy 46 are not justified and does not provide an appropriate strategy. The Plan is its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 11.22. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 11.23. However, Firsure consider that with increased flexibility in Part A in relation to NDSS, and a reduction of the target in part B to reflect evidence on need the Local Plan can be found sound. Firsure must work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 11.24. To overcome the objection and address soundness matters, the Council should: - Remove or increase the flexibility in part A of the policy which refers to national space standards - Remove or significantly reduce the requirement in Part B of the policy which requires 65% of all new homes to be accessible and adaptable.

Summary:
Part A of Policy 46 is seeking to implement national space standards without the requisite justification and evidence. This policy looks for development to meet national spaces standards as a minimum (for residential). The enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis. Welcomes the provision of new evidence on Housing Design Standards Policy. Standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The housebuilding industry knows its customers what type and size of housing is in demand. The use of Nationally Described Space Standards, can therefore impact on the delivery of affordable products, and can serve to stifle innovative design. The Council should recognise the larger land take from such houses will require more land take. Therefore to deliver this would reduce the yield of sites and could have potential implications on the site yields identified by the Council on identified and allocated sites, ultimately resulting in the Council failing to meet their housing targets. The viability assessment has applied an average house size which is stated to reflect NDSS. However, the mix tested does not reflect the Policy 8 requirement. Further the viability demonstrates that site typologies in low value areas are unviable based on the base assumptions, and viability is worsened with addition of other planning requirements of the Local Plan, and in some circumstances some typologies in medium value areas were demonstrated to be unviable. The 23% affordable housing requirement has not been tested in combination with all the requirements of Policy 4. There needs to be greater flexibility in Policy 46 with regards to the use of NDSS. Also concerned that part B of this policy states that 65% of all new homes on housing developments of 10 or more units should be built to Part M4(2) of the Building Regulations i.e. accessible and adaptable dwellings. This is a significant increase in the requirement expressed in the earlier draft which required 30% of all housing to meet the standards of Building regulation requirement M4(2). If the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG. The SHMA, Economic Forecasts and Housing Needs Assessment and subsequent Housing Design Standards Policy Evidence paper unfortunately does not provide sufficient evidence and does not justify the Council's position identified in the policy. The Housing Needs Assessment 2019, whilst referred to in the background paper and Local Plan was not available at the time of writing. It is important to note that if the Council are seeking the higher optional standards that the evidence is forthcoming. Do not dispute the population is ageing. However, it is unclear how this ageing population and potential future need reflects in the need for 65 percent of all new homes on sites of 10 or more dwellings to be provided at M4(2) standards. The optional higher M4(2) standard should only be introduced on a "need to have" rather than a "nice to have" basis. Although there is evidence of an ageing population having regard to the PPG this does not amount to the justification required for the Council to include the optional standard as specified in Policy 46. The Councils housing Design Standards Policy Evidence Paper evidences the ageing population, indicating that the percentage of over 65's grows from 18.7% to 25%, Not all people over 65 will require a new home or adapted home. Indeed the paper recognises this in paragraph 2.53 where it states "not all of this demand will be met through new builds, and existing stock will play some part". The paper notes considers the level of people with Limiting Long Term Illnesses or Disabilities and expects just less than 40% of households will have a person with a long term health problem or disability, the majority of people with a long term health problem or disability are over 65 (60%). Thus there is not sufficient evidence to support a requirement of 65% based on evidence of need. It is important that the Council recognises the viability implications of requiring all houses to meet these enhanced standards. The whole plan viability evidence notes that all typologies in low value areas are unviable before the consideration of the impact of M4(2) and M4(3) standards. It also demonstrates that the application of M4(2) and M4(3) some typologies are unviable in medium value areas, when tested against a base assumption for affordable housing of 15% and not 23% as sought through Policy 8. This could result in stalled development where time is taken to debate viability issues. The Council must 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. The Council should reduce the percentage requirements to ensure the deliverability of any policy. The policy must not be set at such a scale that will threaten development to be in line with the Framework and guidance established in PPG. With increased flexibility in Part A in relation to NDSS, and a reduction of the target in part B to reflect evidence on need the Local Plan can be found sound.

Response:
Refer to response for representation 02073 which raises similar issues.
13.1. Metroland is concerned with Policy 46 and consider that the Policy 46 is unsound. Test of Soundness 13.2. Metroland considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy. Justification 13.3. Metroland is concerned that part A of this policy is seeking to implement national space standards without the requisite justification and evidence. 13.4. This policy looks for development to meet national spaces standards as a minimum (for residential). The enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a ‘need to have’ rather than a ‘nice to have’ basis. 13.5. PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that ‘where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas. 13.6. Need - evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. 13.7. Viability - the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. 13.8. Timing - there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’. 13.9. Metroland welcomes the provision of new evidence on Housing Design Standards Policy. Metroland consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The housebuilding industry knows its customers what type and size of housing is in demand. The use of Nationally Described Space Standards, can therefore impact on the delivery of affordable products, and can serve to stifle innovative design. As such Metroland consider that NDSS should only be applied to affordable housing and not to open market. 13.10. On NDSS Metroland would encourage the Council to recognise the larger land take such houses will require more land take. Therefore to deliver this would reduce the yield of sites and could have potential implications on the site yields identified by the Council on identified and allocated sites, ultimately resulting in the Council failing to meet their housing targets. 13.11. Metroland note that the viability assessment has applied an average house size which is stated to reflect NDSS, However Metroland note that the mix tested does not reflect the Policy 8 requirement. Further the viability demonstrates that site typologies in low value areas are unviable based on the base assumptions, and viability is worsened with addition of other planning requirements of the Local Plan, and in some circumstances some typologies in medium value areas were demonstrated to be unviable. The 23% affordable housing requirement has not been tested in combination with all the requirements of Policy 46, Metroland consider that there needs to be greater flexibility in Policy 46 with regards to the use of NDSS. 13.12. Metroland is also concerned that part B of this policy states that 65% of all new homes on housing developments of 10 or more units should be built to Part M4(2) of the Building Regulations i.e. accessible and adaptable dwellings. This is a significant increase in the requirement expressed in the earlier draft which required 30% of all housing to meet the standards of Building regulation requirement M4 (2). 13.13. Metroland is generally supportive of providing homes for older and disabled persons. However, if the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG. The SHMA, Economic Forecasts and Housing Needs Assessment and subsequent Housing Design Standards Policy Evidence paper unfortunately does not provide sufficient evidence and does not justify the Council’s position identified in the policy. The Housing Needs Assessment 2019, whilst referred to in the background paper and Local Plan was not available at the time of writing. Metroland reserve the right to comment further when this is made available. 13.14. It is important that if the Council are seeking the higher optional standards that the evidence is forthcoming. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. 13.15. The Written Ministerial Statement dated 25th March 2015 stated that: 13.16. The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG. 13.17. NPPG states that where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations and should not impose any additional information requirements (for instance provision of furnished layouts) or seek to determine compliance with these requirements, which is the role of the Building Control Body. This is to ensure that all parties have the clarity and certainty of knowing which standards they have to deal with and can factor these into their plans. For developers, this ensures that the design and procurement complications that previously arose from a series of different standards in different areas are avoided. It was recognised that it was not appropriate to apply Category 2 or 3 standards to all new homes as not all people who buy or move in to new homes need or wish to have such provision. Category 2 and 3 standards were therefore made "optional" with the position being that the case for requiring such standards in future new homes should be made through the adoption of local plan policies that have properly assessed the level of requirement for these standards in the local area, also taking into account other relevant factors including the impact on project viability. 13.18. Metroland
does not dispute the population is ageing. However, it is unclear how this ageing population and potential future need reflects in the need for 65 percent of all new homes on sites of 10 or more dwellings to be provided at M4(2) standards. The optional higher M4(2) standard should only be introduced on a “need to have” rather than a “nice to have” basis. Although there is evidence of an ageing population having regard to the PPG this does not amount to the justification required for the Council to include the optional standard as specified in Policy 46. 13.19. The Councils housing Design Standards Policy Evidence Paper evidences the ageing population, indicating that the percentage of over 65’s grows from 18.7% to 25%. Not all people over 65 will require a new home or adapted home. Indeed the paper recognises this in paragraph 2.53 where it states “not all of this demand will be met through new builds, and existing stock will play some part”. The paper notes considers the level of people with Limiting Long Term Illnesses or Disabilities and expects just less than 40% of households will have a person with a long term health problem or disability, the majority of people with a long term health problem or disability are over 65 (60%). Thus there is not sufficient evidence to support a requirement of 65% based on evidence of need. 13.20. It is important that the Council recognises the viability implications of requiring all houses to meet these enhanced standards. The whole plan viability evidence notes that all typologies in low value areas are unviable before the consideration of the impact of M4(2) and M4(3) standards. It also demonstrates that the application of M4(2) and M4(3) some typologies are unviable in medium value areas, when tested against a base assumption for affordable housing of 15% and not 23% as sought through Policy 8, Therefore, Metroland consider that this could result in stalled development where time is taken to debate viability issues. The Council must 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. Metroland would urge the Council to reduce the percentage requirements to ensure the deliverability of any policy. The policy must not be set at such a scale that will threaten development to be in line with the Framework and guidance established in PPG. 13.21. Metroland consider that the requirements in Policy 46 are not justified and does not provide an appropriate strategy. The Plan is its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 13.22. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. However, Metroland consider that with increased flexibility in Part A in relation to NDSS, and a reduction of the target in part B to reflect evidence on need the Local Plan can be found sound. Metroland will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 13.23. To overcome the objection and address soundness matters, the Council should: - Remove or increase the flexibility in part A of the policy which refers to national space standards. - Remove or significantly reduce the requirement in part B of the policy which requires 65% of all new homes to be accessible and adaptable homes.

Summary:
Policy 46 - Housing Design Standards: 1. Policy could impact on deliverability and viability. 2. Part A - national space Standards - no evidence to justify implementation. 3. Remove or increase flexibility. 4. Part B - remove or reduce the requirement (65% of all new homes to be accessible/adaptable).

Response:
Refer to response for representation 02073 which raises similar issues.
Policy 46 seeks to implement the Nationally Described Space Standards (NDSS) as a minimum for all new houses. It is important to recognise that the National Planning Policy Guidance (NPPG) suggest that authorities can chose to apply or dis-apply the NDSS in particular locations or for particular development types, such as BTR schemes (Note 1 - Paragraph: 011 Reference ID: 60-011-20180913). However, there is no recognition in the Policy that particular types of housing which have special circumstances, such as BTR, should not rigidly confirm to the NDSS. Part of BTR's popularity is the standard of living accommodation provided within apartments, in particular the fundamental characteristic of shared (communal) amenity space, rather than private amenity space within homes, to create a community feel within the development. BTR apartments are often far more efficiently laid out and, despite being smaller, and provide the standard of living space as a NDSS-compliant unit; through open plan living space, etc. This is recognised in the industry standard document, produced by the Urban Land Institute ("Build to Rent: A Best Practice Guide Second Edition"). Section 4.3 of the guidance recognises the specific layout and space requirements of BTR, and how these differ from traditional forms of housing, noting: 'Build to Rent requires a different approach to the design of the layout compared to traditional private housing? Viable Build to Rent developments will require more efficient design of the resident's private dwelling areas and associated circulation? However, this saved space on accommodation levels is redistributed to residents' shared internal and external amenities and facilities? The good practice principle is that residents should feel they are "renting the whole building" not just the private dwelling and this should be reflected in the design of the layout. This is not about less space but a redistribution to reflect the priorities of rental tenure.'

Furthermore, when compared to build-to-sell models, BTR has a much lower rate of return, which can create viability issues. Applying the same space standards to BTR in the same manner as traditional market products can place undeliverable demands on the design, in turn impacting on the deliverability of new homes in this sector. As set out under Draft Policy 8, DC should warrant BTR specific recognition and support within the DLP. Draft Policy 46 would therefore not be justified and not consistent with national planning policy guidance. The Policy should be amended to reflect that whilst the Council will pursue NDSS, this would be dis-applied in particular circumstances where it is not viable, and it can be proven to provide quality accommodation. The characterises of BTR should be referenced as a format where it may not be appropriate to apply NDSS.

CONCLUSION: However, in relation to the draft policies listed below, the DLP as currently drafted is not justified and unsound. To make the plan sound, the following amendments noted above are required. Policy: Policy 46 Topic: Housing Design Standards Requested Change: The Policy should be amended to reflect that a deviation to NDSS will be allowed, where the characteristics or circumstances of a development means it is appropriate to do so, specifically referencing BTR as a format where this is the case.

Summary:
Policy 46 (Housing Design Standards) should be amended to reflect that a deviation to Nationally Described Space Standards (NDSS) will be allowed, where the characteristics or circumstances of a development means it is appropriate to do so, specifically referencing Build to Rent as a format where this is the case. Part of BTR’s popularity is the standard of living accommodation provided within apartments, in particular the fundamental characteristic of shared (communal) amenity space, rather than private amenity space within homes, to create a community feel within the development. BTR apartments are often far more efficiently laid out and, despite being smaller, and provide the standard of living space as a NDSS-compliant unit; through open plan living space, etc. This is recognised in the industry standard document, produced by the Urban Land Institute ("Build to Rent: A Best Practice Guide Second Edition"). Section 4.3 of the guidance recognises the specific layout and space requirements of BTR, and how these differ from traditional forms of housing. Furthermore, when compared to build-to-sell models, BTR has a much lower rate of return, which can create viability issues. Applying the same space standards to BTR in the same manner as traditional market products can place undeliverable demands on the design, in turn impacting on the deliverability of new homes in this sector.

Response:
The Council acknowledged this point in the drafting of Policy 46 and points to the allowance of a potential deviation from the NDSS through being robustly justified and offset through exceptional or innovative design, as outlined within the Policy text and the explanatory text at 12.31. The Council has also included in the policy the provision for applicants to robustly demonstrate, with appropriate evidence, that adhering to the standards is not viable.
Nationally Described Space Standards  This policy requires residential development proposals to meet national space standards as a minimum. However, these enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and where they do not have an adverse impact on viability which might undermine the delivery of a plan. As such they can only be introduced on a 'need to have' rather than a 'nice to have' basis. The Council has produced an evidence based document entitled the 'Housing Design Standards Policy Local Plan Evidence Base' with the objective of justifying the policy. This aims to provide justification for the requirement of internal space standards and, as outlined by the PPG (ID56-020), this is broken down into three areas: need, viability, and timing. The evidence base highlights that on average new dwellings in the UK and in particular in the Yorkshire and Humber are significantly smaller than developments in Europe despite similar issues and restrictions. While this may indicate a wider issue it is not locally specific to the Council. As part of his study DMBC surveyed 246 homes across 47 sites to determine how many met the nationally described space standards (NDSS) of the area suggests that of current new dwellings and their floor plans only 23 out of 246 dwellings would meet the NDSS as proposed. It is not apparent if these sites had been submitted after the Government introduction of the NDSS, but it seems unlikely that it would have been in place at the time many of the applications were submitted. The Council indicate that through their research they have identified that a number of properties have not been built to the NDSS. They state that '201 out of the 246 plans assessed met the gross internal floor area based on their proposed number of bedrooms' and that 'plans were more likely to fail against the NDSS based on storage space or bedroom size, highlighting an internal design issue as opposed to dwelling plot size'. This is a small sample of only 246 dwellings and therefore provides insignificant evidence to base the policy upon. It also suggests that the majority of sites are meeting some of the standards and therefore the actual need within the Borough appears to be overestimated. The Council also suggest that the NDSS would be beneficial in providing ventilation, reducing under-occupancy and overcrowding. However, the evidence provided is limited in terms of numbers of properties considered and the potential market comparisons made. It is not evident from the information provided what 'need' there actually is for properties built to the standards there is no evidence that these smaller properties are not selling, there is no evidence provided that customers are not satisfied with these properties or that these properties are not comparable to other properties available in the market area. Viability  It is stated that the impact on affordability would differ depending on how far the current design is divergent from the standard. The Council contend that the sample survey indicates that the vast majority of dwellings would only need internal design changes to meet the NDSS, and thus there would be little extra cost incurred by the developer or buyer. It is also stated that the benefit of increased storage space and bigger sized bedrooms could allow some households to buy a house with fewer bedrooms than they would have originally looked for. The council contends that the impact on affordability would be minimal. However, the introduction of the NDSS would significantly reduce customer choice. Persimmon Homes build family homes which includes a range of entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms, in order that customers can adequately house their families. This includes a range of products geared towards first-time buyers, first-time movers and young families. Arbitrarily increasing the size of all homes will result in an increase in build cost. Persimmon Homes builds in excess of 16,500 homes each year in around 375 prime locations and is proud to be one of the UK's leading house builders, committed to the highest standards of design, construction and service. The industry understands customers and their needs and, accordingly, designed homes which appeal to the market.

Timing  It is suggested by the Council that as the Emerging Local Plan is still to go through an examination and that as consultation has been undertaken as part of the Local Plan process over a significant period of time that this has provided sufficient time to notify developers of the upcoming changes. The Local Plan policies have yet to be formally assessed by an inspector and may be subject to modifications during this process. Although developers may be aware of draft policies sufficient time post adoption should be allowed as a transitional period. In addition, changes to internal layout requirements may take developers some time to design. The proposal within the policy is that 100% of new dwellings should meet the standards. The policy wording states that any deviation from the NDSS must be robustly justified, clearly evidenced and offset through exceptional and innovative design. This is overly restrictive and will force developers to provide onerous evidence. Persimmon Homes consider that this policy has not been prepared in a manner which is consistent with national policy and guidance and that it has not been positively prepared. The policy has not been effectively justified to provide a clear rationale for the imposition of the NDSS standards or for the quantum of 100% of all new homes. The Council should, unless they can provide sufficient evidence, remove this policy. With regards to the quantum, the Council has not tested alternative options such as requiring a lower percentage of homes to meet the NDSS standard. The policy is therefore not based on an appropriate strategy and all options should be tested and subject to sustainability appraisal. Accessible and Adaptable Dwellings (M4(2))  Policy 46 seeks to require 65% of homes on developments of 10 or more (or over 0.5ha) to meet the M4(2) optional standard, and for 5% of homes to meet the M4(3) standard. While the provision of homes suitable for those with limiting long term illnesses or disabilities is supported, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. It must be remembered that all new homes will be built to part M4(1). According to Part M of
the Building Regulations meeting M4(1) will ensure reasonable provision for most people, including wheelchair users, to approach and enter the dwelling and to access habitable rooms and sanitary facilities on the entrance storey. As such these standards are likely to be suitable for the vast majority of people. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Doncaster which justifies the inclusion of optional higher standards for accessible / adaptable homes in its Local Plan policy. The Housing Design Standards Policy Evidence Paper (June 2019) identifies that 18.78% of the population of Doncaster was over 65 years in 2017 and that 24.83% will be by 2035. It is not clear how this ageing population and potential future need is reflected in or justifies the proposed requirement for 65% of all new homes to be provided at M4(2) standards. If it had been the Government’s intention that generic statements identifying an ageing population justified adoption of the accessible & adaptable homes standards, then the logical solution would have been to incorporate the M4(2) as mandatory via the Building Regulations which the Government has not done. The optional higher M4(2) standard should only be introduced on a "need to have" rather than a "nice to have" basis. The evidence does not demonstrate this need. The Whole Plan Viability Testing (2019) report outlines that the policy will result in viability issues for some sites. It shows that schemes in the low value areas are not viable and will not be able to support the optional housing standards along with the cumulative requirements of other policies. If the Council can provide the appropriate evidence and this policy is to be included, then it is recommended that an appropriate transition period is included within the policy. The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances; and that policies for wheelchair accessible homes should only be applied to affordable housing provided in certain tenures for example. The policy should therefore be removed, or requirement reduced significantly to reflect the evidence and viability concerns.

Summary:
The Council's evidence base document 'Housing Design Standards Policy Local Plan Evidence Base' does not justify the policy. Policy 46 requires residential development to meet national space standards as a minimum. However, these enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and where they do not have an adverse impact on viability which might undermine the delivery of a plan. As such they can only be introduced on a 'need to have' rather than a 'nice to have' basis. Need There is a lack of Doncaster-specific evidence to demonstrate need and the sample size is too small to draw conclusions. Evidence used suggests that the majority of sites are meeting some of the standards and therefore the actual need within the Borough appears to be overestimated. Viability It is stated that the impact on affordability would differ depending on how far the current design is divergent from the standard. The Council contend that the sample survey indicates that the vast majority of dwellings would only need internal design changes to meet the NDSS, and thus there would be little extra cost incurred by the developer or buyer. It is also stated that the benefit of increased storage space and bigger sized bedrooms could allow some households to buy a house with fewer bedrooms than they would have originally looked for. The Council contends that the impact on affordability would be minimal. However, the introduction of the NDSS would significantly reduce customer choice. Persimmon Homes build family homes which includes a range of entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms, in order that customers can adequately house their families. This includes a range of products geared towards first-time buyers, first-time movers and young families. Arbitrarily increasing the size of all homes will result in an increase in build cost. Timing Although developers may be aware of draft policies sufficient time post adoption should be allowed as a transitional period. In addition, changes to internal layout requirements may take developers some time to design. Accessible and Adaptable Dwellings (M4(2)) PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Doncaster which justifies the inclusion of optional higher standards for accessible / adaptable homes in its Local Plan policy. The Housing Design Standards Policy Evidence Paper (June 2019) identifies that 18.78% of the population of Doncaster was over 65 years in 2017 and that 24.83% will be by 2035. It is not clear how this ageing population and potential future need is reflected in or justifies the proposed requirement for 65% of all new homes to be provided at M4(2) standards. If it had been the Government’s intention that generic statements identifying an ageing population justified adoption of the accessible & adaptable homes standards, then the logical solution would have been to incorporate the M4(2) as mandatory via the Building Regulations which the Government has not done. The Whole Plan Viability Testing (2019) report outlines that the policy will result in viability issues for some sites. It shows that schemes in the low value areas are not viable and will not be able to support the optional housing standards along with the cumulative requirements of other policies. If the Council can provide the appropriate evidence and this policy is to be included, then it is recommended that an appropriate transition period is included within the policy.

Response:
Refer to response for representation 0129 which raises similar issues.
We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

**Area:** Chapter 12: Design & the Built Environment

**Policy:** Policy 46: Housing Design Standards

**Tests of Soundness:**
- Positively prepared
- Justified
- Consistent with national

**Comment:**
Nationally Described Space Standards This policy requires residential development proposals to meet national space standards as a minimum. However, these enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and where they do not have an adverse impact on viability which might undermine the delivery of a plan. As such they can only be introduced on a 'need to have' rather than a 'nice to have' basis. The Council has produced an evidence based document entitled the 'Housing Design Standards Policy Local Plan Evidence Base' with the objective of justifying the policy. This aims to provide justification for the requirement of internal space standards and, as outlined by the PPG (ID56-020), this is broken down into three areas: need, viability, and timing. 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Response:
Refer to response for representation 0129 which raises similar issues.
We support the requirement in Criterion A1 that proposals for Non-Residential, Commercial and Employment Developments should be sympathetic to local character in terms of their layout, siting, height, massing, form, scale, detailing, materials, landscaping or, where appropriate, their heritage significance. We also welcome the requirement that historic shop fronts are to be retained unless their loss can be justified. Doncaster has many examples of historic shop fronts. These make an important contribution to the character of the local area. These measures will help to deliver the Plan's Objectives regarding quality of place and the historic environment.

Response:
Support welcomed
Tests of Soundness:

Comment:
We continue to welcome the reference in part A) carried forward from the Draft Local Plan, which aims to maximise links access to Open Space, which would benefit the wellbeing of new (and existing) communities.

Summary:
We continue to welcome the reference in part A) carried forward from the Draft Local Plan, which aims to maximise links access to Open Space, which would benefit the wellbeing of new (and existing) communities.

Response:
Support noted.
Comment Ref: C/Policy 49/03431/1/017

Reason: We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Area: Chapter 12: Design & the Built Environment

Policy: Policy 49: Landscaping of New Developments

Tests of Soundness: Justified

Comment:

Bullet C within this policy requires 'generous tree, shrub and hedgerow planting', the explanatory text for this policy states that 1 tree per dwelling is required. No evidence is provided to support this requirement. This policy is therefore not justified.

Summary:

Policy 49 Part C requires 'generous tree, shrub and hedgerow planting'. The explanatory text states that 1 tree per dwelling is required. No evidence is provided to support this requirement. This policy is therefore not justified.

Response:

This is a clear objective and easily measurable target to deliver the environmental benefits of tree planting. It exactly reflects an existing requirement in the Council’s adopted DGAR SPD which has been in operation for a number of years without any significant adverse implications or viability issues. Persimmon have already adequately met this requirement on a number of sites in the Borough without disagreement with the Council.
Comment:

2.51 Our Client is generally supportive of this policy, it is in their interests to make their developments as visually attractive as possible. However, we would advise that the Policy is revised to add a caveat that the proposals within the policy are subject to viability.

Summary:

Policy 49 - Landscaping of New Development o Generally supportive of Policy but should be revised to assess impact on viability

Response:

Support noted. The policy requirements reflects existing requirements in the Council's adopted DGAR SPD which has been in operation for a number of years without any significant adverse implications or viability issues. it is not considered a viability caveat is required as any development proposal would also be assessed against policy 67. If it were to be the case that this design policy (alone or in combination with other requirements) was having a significant adverse impact on viability it would be considered under policy 67 with the applicants given the opportunity to demonstrate why this is the case.
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**Comment:**

2.51 Our Client is generally supportive of this policy, it is in their interests to make their developments as visually attractive as possible. However, we would advise that the Policy is revised to add a caveat that the proposals within the policy are subject to viability.

**Summary:**

Policy 49 - Landscaping of New Development o Generally supportive of Policy but should be revised to assess impact on viability

**Response:**

Support noted. The policy requirements reflects existing requirements in the Council's adopted DGAR SPD which has been in operation for a number of years without any significant adverse implications or viability issues. It is not considered a viability caveat is required as any development proposal would also be assessed against policy 67. If it were to be the case that this design policy (alone or in combination with other requirements) was having a significant adverse impact on viability it would be considered under policy 67 with the applicants given the opportunity to demonstrate why this is the case.
Comment Ref: C/Policy 49/05289/1/017

Attend Examination: Attend Hearing

Reason: We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Area: Chapter 12: Design & the Built Environment

Policy: Policy 49: Landscaping of New Developments

Tests of Soundness:

Justified

Comment:

Bullet C within this policy requires 'generous tree, shrub and hedgerow planting', the explanatory text for this policy states that 1 tree per dwelling is required. No evidence is provided to support this requirement. This policy is therefore not justified.

Summary:

Policy 49 Part C requires 'generous tree, shrub and hedgerow planting'. The explanatory text states that 1 tree per dwelling is required. No evidence is provided to support this requirement. This policy is therefore not justified.

Response:

This is a clear objective and easily measurable target to deliver the environmental benefits of tree planting. It exactly reflects an existing requirement in the Council’s adopted DGAR SPD which has been in operation for a number of years without any significant adverse implications or viability issues. Persimmon have already adequately met this requirement on a number of sites in the Borough without disagreement with the Council.
| CUSREF: | 05290 | Name: | Persimmon Homes |
| Date:   | 26/09/2019 | Organisation: | Persimmon Homes |

**Comment Ref:** C/Policy 49/05290/1/017  
**Attend Examination:** Attend Hearing  
**Reason:** We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

| Area: | Chapter 12: Design & the Built Environment |
| Policy: | Policy 49: Landscaping of New Developments |

**Tests of Soundness:**

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**Response:**

This is a clear objective and easily measurable target to deliver the environmental benefits of tree planting. It exactly reflects an existing requirement in the Council’s adopted DGAR SPD which has been in operation for a number of years without any significant adverse implications or viability issues. Persimmon have already adequately met this requirement on a number of sites in the Borough without disagreement with the Council.
Comment: We support this Policy especially the requirements that any advertisements should not harm the significance of a listed building, Conservation Area, or other designated heritage assets. This will help to deliver the Plan's Objectives regarding quality of place and the historic environment.

Summary: 'Sound'. We support this Policy especially the requirements that any advertisements should not harm the significance of a listed building, Conservation Area, or other designated heritage assets. This will help to deliver the Plan's Objectives regarding quality of place and the historic environment.

Response: Support welcomed.
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**Comment:**
No clarification is provided as to what is meant in this policy by 'healthcare infrastructure implications'. There is also no evidence provided as to why the borough has special local characteristics for such a requirement and it is therefore unjustified. Where the Council wishes to seek planning obligations, this should be based on evidence which demonstrates a clear need for the contribution, and that any such contributions meet the relevant tests.

**Summary:**
No clarification is provided as to what is meant in Policy 51 by 'healthcare infrastructure implications'. There is also no evidence provided as to why the borough has special local characteristics for such a requirement and it is therefore unjustified. Where the Council wishes to seek planning obligations, this should be based on evidence which demonstrates a clear need for the contribution, and that any such contributions meet the relevant tests.

**Response:**
Policy 66 sets out developer contributions, Policy 51 suggests that healthcare infrastructure implications of any relevant proposed development have been considered and addressed. This may include additional consultation with healthcare providers to ensure the proposed development will improve and promote strong, vibrant and healthy communities.
Test of Soundness:

Unsound - not stated

Comment:

2.52 Part f) of the policy states that "the developer will demonstrate they have undertaken, and responded to the findings of, a Health Impact Assessment (HIA) ". 2.53 The requirement for a HIA should be dealt with via the Council’s local validation check list and not through a specific planning policy. Our Client therefore objects to the policy on the basis that it is not effective or consistent with the Framework, and we would advise that it is deleted. 2.54 Our understanding is that the information that forms part of the HIA is often matters which are beyond the control of the applicant and relate to the choices of individuals who occupy developments. 2.55 Our Client is supportive of a strategic policy which seeks to improve the health and wellbeing of Doncaster residents, however, the policy, as written is unsound. It takes a broad brush approach and there appears to be no evidence which suggests that a HIA would be required for all schemes over 100 houses (as per the Screening Tool).

Summary:

Policy 51 - Health 1. Policy as written is un-sound. 2. Re need for a Health Impact Assessment (HIA) - Should be dealt with through the ‘validation checklist’ and not the Policy. 3. Often matters which are beyond the control of the applicant and relate to the choices of individuals who occupy developments. 4. Appears to be no evidence which suggests that a HIA would be required for all schemes over 100 houses (as per the Screening Tool).

Response:

Support noted. Doncaster’s local validation checklist does include a Health Impact Assessment to be submitted with planning applications when determined by the Planning Authority. They enable the decision making process to consider the ever increasing demand on planning authorities to create healthy places and promote healthy behaviours and environments and reduce health inequalities for people of the borough.

https://www.doncaster.gov.uk/services/health-wellbeing/health-impact-assessments-hias-for-planning-and-development
2.52 Part f) of the policy states that "the developer will demonstrate they have undertaken, and responded to the findings of, a Health Impact Assessment (HIA)". 2.53 The requirement for a HIA should be dealt with via the Council's local validation check list and not through a specific planning policy. Our Client therefore objects to the policy on the basis that it is not effective or consistent with the Framework, and we would advise that it is deleted. 2.54 Our understanding is that the information that forms part of the HIA is often matters which are beyond the control of the applicant and relate to the choices of individuals who occupy developments. 2.55 Our Client is supportive of a strategic policy which seeks to improve the health and wellbeing of Doncaster residents, however, the policy, as written is unsound. It takes a broad brush approach and there appears to be no evidence which suggests that a HIA would be required for all schemes over 100 houses (as per the Screening Tool).

Summary:
Policy 51 - Health  1. Policy as written is un-sound. 2. Re need for a Health Impact Assessment (HIA) - Should be dealt with through the 'validation checklist' and not the Policy. 3. Often matters which are beyond the control of the applicant and relate to the choices of individuals who occupy developments. 4. Appears to be no evidence which suggests that a HIA would be required for all schemes over 100 houses (as per the Screening Tool).

Response:
Support noted. Doncaster’s local validation checklist does include a Health Impact Assessment to be submitted with planning applications when determined by the Planning Authority. They enable the decision making process to consider the ever increasing demand on planning authorities to create healthy places and promote healthy behaviours and environments and reduce health inequalities for people of the borough.
https://www.doncaster.gov.uk/services/health-wellbeing/health-impact-assessments-hias-for-planning-and-development
Comment: UKOOG Response: Policy 51, F) states; ‘that proposals for development or change of use will be assessed against the Health Impact Assessment Screening Tool and, when determined if required, the developer will demonstrate they have undertaken, and responded to the findings of, a Health Impact Assessment (HIA).’ We would like to advise the council that where development is subject to EIA, Health impacts will be included in that process and a separate HIA should not be a separate requirement.

Summary: Policy 51. Comment? where development is subject to EIA, Health impacts will be included and a HIA should not be a separate requirement.

Response: Comment noted. No change proposed
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**Comment:**
Where development is subject to Environmental Impact Assessment (EIA), health impacts should be included in that process. It is considered a separate HIA should not be a requirement of development (F) and should only be required on a case by case basis.

**Summary:**
Where development is subject to Environmental Impact Assessment (EIA), health impacts should be included in that process. It is considered a separate HIA should not be a requirement of development (F) and should only be required on a case by case basis.

**Response:**
Comment noted. No proposed change. NPPF paragraph 91 states planning policies... should aim to achieve healthy, inclusive and safe places... enable and support healthy lifestyles.
We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Tests of Soundness:

Justified

Comment:

No clarification is provided as to what is meant in this policy by 'healthcare infrastructure implications'. There is also no evidence provided as to why the borough has special local characteristics for such a requirement and it is therefore unjustified. Where the Council wishes to seek planning obligations, this should be based on evidence which demonstrates a clear need for the contribution, and that any such contributions meet the relevant tests.

Summary:

No clarification is provided as to what is meant in Policy 51 by 'healthcare infrastructure implications'. There is also no evidence provided as to why the borough has special local characteristics for such a requirement and it is therefore unjustified. Where the Council wishes to seek planning obligations, this should be based on evidence which demonstrates a clear need for the contribution, and that any such contributions meet the relevant tests.

Response:

Policy 66 sets out developer contributions, Policy 51 suggests that healthcare infrastructure implications of any relevant proposed development have been considered and addressed. This may include additional consultation with healthcare providers to ensure the proposed development will improve and promote strong, vibrant and healthy communities.
Comment Ref: C/Policy 51/05290/1/018

Attend Examination: Attend Hearing

Reason: We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Area: Chapter 13: Health, Wellbeing & Our Communities

Policy: Policy 51: Health

Tests of Soundness: Justified

Comment:
No clarification is provided as to what is meant in this policy by 'healthcare infrastructure implications'. There is also no evidence provided as to why the borough has special local characteristics for such a requirement and it is therefore unjustified. Where the Council wishes to seek planning obligations, this should be based on evidence which demonstrates a clear need for the contribution, and that any such contributions meet the relevant tests.

Summary:
No clarification is provided as to what is meant in Policy 51 by 'healthcare infrastructure implications'. There is also no evidence provided as to why the borough has special local characteristics for such a requirement and it is therefore unjustified. Where the Council wishes to seek planning obligations, this should be based on evidence which demonstrates a clear need for the contribution, and that any such contributions meet the relevant tests.

Response:
Policy 66 sets out developer contributions, Policy 51 suggests that healthcare infrastructure implications of any relevant proposed development have been considered and addressed. This may include additional consultation with healthcare providers to ensure the proposed development will improve and promote strong, vibrant and healthy communities.
Comment:
We are supportive of this policy and consider the evidence requirements set out within paragraph 13.8 will protect valued facilities, consistent with paragraph 92 of the NPPF (2019). We welcome that paragraph 13.10 now makes clear the policy applies to theatres along with other cultural facilities which accords with community and cultural facilities being managed together within the NPPF.

Summary:
Support Policy 52 and consider evidence set out in 12.8 will protect valued facilities and is consistent with para. 92 of the NPPF. Welcome that paragraph 13.10 makes clear the policy applies to theatres alongside other cultural facilities which accords with the NPPF.

Response:
Support noted.
We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Comment:
There is no clear and transparent process for determining how and when on-site provision is required. The explanatory text states that in some cases that some individual or mixed-use proposals could be large enough to generate the need for new schools, this should provide clear guidance on what would trigger such a requirement. The site by site nature of the assessment gives uncertainty for developers. This could affect the deliverability of sites and affect the ability of the Borough to meet its housing need. The policy needs further revision to clarify to ensure that it is clear and transparent.

Response:
Policy 66 sets out developer contributions, Policy 53 considers new education facilities inline with NPPF (para 94) and PPG requirements.
Comment Ref: C/Policy 53/05289/1/019

Attend Examination: Attend Hearing

Reason: We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Area: Chapter 13: Health, Wellbeing & Our Communities

Policy: Policy 53: New Education Facilities

Tests of Soundness:

Comment:
There is no clear and transparent process for determining how and when on-site provision is required. The explanatory text states that in some cases that some individual or mixed-use proposals could be large enough to generate the need for new schools, this should provide clear guidance on what would trigger such a requirement. The site by site nature of the assessment uncertainty for developers. This could affect the deliverability of sites and affect the ability of the Borough to meet its housing need. The policy needs further revision to clarify to ensure that it is clear and transparent.

Summary:
There is no clear and transparent process for determining how and when on-site education provision is required. The explanatory text states that in some cases that some individual or mixed-use proposals could be large enough to generate the need for new schools. The Policy should provide clear guidance on what would trigger such a requirement. The site by site nature of the assessment gives uncertainty for developers. This could affect the deliverability of sites and affect the ability of the Borough to meet its housing need. The policy needs further revision to clarify to ensure that it is clear and transparent.

Response:
Policy 66 sets out developer contributions, Policy 53 considers new education facilities inline with NPPF (para 94) and PPG requirements.
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**Comment:**

There is no clear and transparent process for determining how and when on-site provision is required. The explanatory text states that in some cases that some individual or mixed-use proposals could be large enough to generate the need for new schools, this should provide clear guidance on what would trigger such a requirement. The site by site nature of the assessment uncertainty for developers. This could affect the deliverability of sites and affect the ability of the Borough to meet its housing need. The policy needs further revision to clarify to ensure that it is clear and transparent.

**Summary:**

There is no clear and transparent process for determining how and when on-site education provision is required. The explanatory text states that in some cases that some individual or mixed-use proposals could be large enough to generate the need for new schools. The Policy should provide clear guidance on what would trigger such a requirement. The site by site nature of the assessment gives uncertainty for developers. This could affect the deliverability of sites and affect the ability of the Borough to meet its housing need. The policy needs further revision to clarify to ensure that it is clear and transparent.

**Response:**

Policy 66 sets out developer contributions, Policy 53 considers new education facilities inline with NPPF (para 94) and PPG requirements.
Comment:

As there is no mention of our representation in the consultation summary, we do not know why our previous comments have not been included in this policy. It appears that our previous comments, recommending how this policy could be strengthened, have not been taken on board. The policy still does not make reference to Source Protection Zones, nor does it give detail on appropriate mitigation measures or sources of information on this (in particular signposting to the Humber River Basin Management Plan). Additionally, we do not feel that the policy is ambitious enough; it only states that “particular consideration will be given to any adverse effects on the quantity, quality and ecology features of water bodies and groundwater resources”. We recommend this policy should demonstrate a commitment against supporting development proposals which could adversely affect surface or ground waterbodies, and additionally demonstrate a commitment to support proposals which would maintain and ideally enhance waterbodies (quantity, quality and ecological features).

Summary:

Policy 55 - Pollution - no response to previous comments and the policy does not make reference to Source Protection Zones or appropriate mitigation. Additionally do not feel the policy is ambitious enough and expect a commitment to not supporting proposals which could adversely affect surface or ground waterbodies and support those that would maintain and ideally enhance waterbodies (quantity, quality and ecological features).

Response:

SPZ’s were being proposed to be dealt with via Policy 61: Protecting & Enhancing Doncaster’s Soil & Water Resource part E2 and explanatory text paras 14.28-14.30, but given the importance of this issue, and that there are numerous SPZ’s across the Borough, then in additional we now propose the following to address these concerns: Policy 55 - Pollution - Part D D) any adverse effects on the quantity, quality and ecology features of water bodies and groundwater resources, including contamination to Source Protection Zones. Explanatory text - para 13.22 (new para) 13.22 Groundwater is an important resource that we rely on every day and provides the majority of drinking water, sustains base flow and ecology in our rivers, and supports lakes and wetland ecosystems. Contamination in or on land can present unacceptable risks to human health and the wider environment, including to groundwater. Doncaster’s water supply depends on groundwater abstractions in the Principal aquifer which has high permeability and needs to be protected to avoid any kind of contamination. The protection is given by buffer zones around the source of drinking water called Source Protection Zones which are divided into 3 zones (inner, outer, and source catchment protection). The Environment Agency provides further guidance on what activities are possible in these zones - see also Policy 61. The Council’s view is that Policy 61 Part E covers matters in relation to not supporting proposals which could adversely affect surface or ground waterbodies etc.
We are encouraged to see the consideration of protected species within this policy. However we would be pleased to see a slight amendment of wording within E to state 'conservation of biodiversity and protected species'. We also feel there should be an additional explanation (13.22) to consider how lighting can be designed to minimise impacts to protected species and notable habitats. This should include consideration for the BCT Guidance note (due to be regularly updated from 2020 hence should reference the most recent version at time of application) and request for detailed lux contour plans (showing max lux levels not averages) to show how dark corridors will be retained on site with sufficient buffers and protection of sensitive habitats. The implementation of this measure is of particular importance due to the presence of Thorne and Hatfield Moors SPA within Doncaster, designated for the presence of European nightjar, Caprimulgus europaeus. Nightjars are a nocturnal species and as such one of the SPA conservation objectives is to minimise disturbance caused by human activity, including light.

Summary:
Policy 55 - YWT likes the consideration of protected species within the policy. Want an amendment to Policy 55. E) to change the word 'or to 'and' to say 'conservation of biodiversity and protected species'. Requesting additional explanation (13.22) to consider how lighting can be designed to minimise impacts to protected species and notable habitats, which should include consideration for the BCT Guidance note (due to be regularly updated from 2020). Request for 'lux' contour plans not averages to show dark corridors (particularly for Nightjar).

Response:
Recommended Policy 55 wording change to include 'and' and not 'or'. Additional paragraph included to explain Part E of Policy 55.
Comment: Additional wording is required to the first paragraph of the policy to reflect the NPPF para 182 which deal with the agent of change principle as follows; Proposed Changes (deletions in strikethrough; new text in bold) - These cannot be shown therefore deletions shown in brackets with X either sides (x deleted text x) and new text in CAPITAL) Development proposals that are likely to cause pollution, or be exposed to pollution, will only be permitted where it can be demonstrated that pollution can be avoided, or where mitigation measures (such as those incorporated into the design and layout of development) will minimise significantly harmful impacts to acceptable levels that protect health, environmental quality and amenity. When determining planning applications, THE AGENT OF CHANGE PRINCIPLE WILL BE APPLIED, AND particular consideration will be given to:

Summary:
Policy 55 Pollution Additional text in capitals. Development proposals that are likely to cause pollution, or be exposed to pollution, will only be permitted where it can be demonstrated that pollution can be avoided, or where mitigation measures (such as those incorporated into the design and layout of development) will minimise significantly harmful impacts to acceptable levels that protect health, environmental quality and amenity. When determining planning applications, THE AGENT OF CHANGE PRINCIPLE WILL BE APPLIED, AND particular consideration will be given to:

Response:
It is not considered necessary to repeat national policy in respect to the agent of change principle.
We are supportive of policy 55, in particular Bullet point D: "any adverse effects on the quality and ecology features of waterbodies and groundwater resources." As detailed above the protection of water resources will be vital to the provision of sustainable new development.

Summary:
Supports policy 55, in particular Bullet point D: "any adverse effects on the quality and ecology features of waterbodies and groundwater resources." The protection of water resources will be vital to the provision of sustainable new development.

Response:
Support noted.
Comment: UKOOG Response: Policy 55 states; ‘Development proposals that are likely to cause pollution, or be exposed to pollution, will only be permitted where it can be demonstrated that pollution can be avoided, or where mitigation measures (such as those incorporated into the design and layout of development) will minimise significantly harmful impacts to acceptable levels that protect health, environmental quality and amenity, when determining planning applications, particular consideration will be given to: A) an assessment of the risks to public health and the impact of cumulative effects and where necessary that the provision for mitigation against the total effects has been provided B) the presence of noise generating uses close to the site, and the potential noise likely to be generated by the proposed development. A Noise Assessment will be required to enable clear decision-making on any relevant planning application. C) the impact on national air quality; especially but not limited to Air Quality Management Areas, areas potentially close to the EU limit value, other sensitive areas and the aims and objectives of the Air Quality Action Plan. An Air Quality Assessment will be required to enable clear decision making on any relevant planning application. D) any adverse effects on the quantity, quality and ecology features of water bodies and groundwater resources. E) the impact of artificial lighting. Artificial lighting has the potential to cause unacceptable light pollution in the form of sky-glow, glare or intrusion onto other property and land. Development proposals should ensure that adequate and reasonable controls to protect dwellings and other sensitive property, the rural night-sky, observatories, road-users, and designated sites for conservation of biodiversity or protected species are included within the proposals.’

Emissions, alongside other potential environmental impacts associated with Oil and Gas developments are regulated by the EA through the Environmental Permitting Regulations, as stated in the evidence base for hydrocarbons. This includes the venting and flaring of methane and other gasses associated with exploration, appraisal and production. ‘Site Containment’ plans are also required by the EA to address any risks to surface or groundwater and the wider environment. This should be stated clearly in the policy and any justification text to avoid confusion. Planning authorities are directly engaged through the EIA process, where one is required. EIA requires an assessment of all potential environmental and health impacts associated with a proposed development. It considers all potential risks, any measures to avoid these risks and suitable mitigation to reduce any remaining potential consequences. An EIA typically includes an assessment of impacts relating to noise, ecology, transport, air quality, archaeology and water, in line with national guidance. The role of EIA should be clearly stated in the policy and justification text. Regarding noise impacts and lighting, Planning Practice Guidance is clear on how noise and other nuisance issues should be addressed and therefore this policy should clearly reference this guidance.

Response: Comment noted. Policy 55 is not just aimed at hydrocarbon development proposals. Where required Planning and Pollution Control will work with and liaise with the EA as required by NPPF / NPPG.
Comment Ref: C/Policy 55/05058/1/003

Attend Examination: Attend Hearing

Reason: The issue raised is complex and we have found it helpful when responding to other plans for the matter to be debated. This was done most recently at East Riding of Yorkshire in January 2019 where the Inspector was able to hear the points raised on each side of the argument and to understand that there was in fact little between the parties in terms of principle. In our submission this may not have been fully apparent in reviewing written submissions and this was confirmed by the conduct of the Hearing where the Inspector thanked the parties for their frankness, helpfulness and courtesy.

Area: Chapter 13: Health, Wellbeing & our Communities

Policy: Policy 55: Pollution

Tests of Soundness:

Comment:

Emissions and any potential environmental impacts associated with hydrocarbon developments are regulated by the Environment Agency (EA) through the Environmental Permitting Regulations, as stated in the evidence base for hydrocarbons. This includes the venting and flaring of methane and other gasses associated with exploration, appraisal and production. 'Site Containment' plans are also required by the EA to address any risks to surface or groundwater and the wider environment. This should be stated clearly in the policy and any justification text to avoid confusion. Planning authorities are directly engaged through the EIA process, where one is required. EIA requires an assessment of all potential environmental and health impacts associated with a proposed development. It considers all potential risks, any measures to avoid these risks and suitable mitigation to reduce any remaining potential consequences. An EIA typically includes such issues as noise, ecology, transport, air quality, archaeology and hydrology, in line with national guidance. The role of EIA should be clearly stated in the policy and justification text. Regarding noise impacts, Planning Practice Guidance is clear on how noise should be addressed and therefore this policy should clearly reference this guidance. Reference should be made to the overlapping roles of other regulators and the Local Plan policies should defer to these regulators.

Summary:

EA (through permitting) regulate environmental impacts. Should state in policy that venting and flaring is regulated by EA permitting regs. The role of EIA should be clearly stated in the policy and justification text. Reference should be made to the overlapping roles of other regulators and the Local Plan policies should defer to these regulators.

Response:

Policy 55 Pollution Comment noted. The Local Plan should be read as a whole. Policy 55 is not just aimed at hydrocarbon development proposals. Where required Planning and Pollution Control will work with and liaise with the EA when and where required as required by NPPF / NPPG. The role of regulators is covered in NPPG. (Paragraphs 014 and 110.) and not required to be repeated in policy. Propose a minor modification to Policy 65 to clarify when an EIA is required? 'If they meet the criteria as set out in the Town and Country Planning Act (EIA Regulations). This will be clarified through a screening or scoping request.'
The Policy is supported in principle. Emissions and any potential environmental impacts associated with oil and gas developments are regulated by the Environment Agency (EA) through their permitting regulations, as stated in the Councils Evidence Base for hydrocarbons. This includes the venting and flaring of methane and other gasses associated with exploration, appraisal and production. 'Site Containment' plans are also required by the EA to address any risks to surface or groundwater and the wider environment. It is considered their responsibilities should be set out in the policy or in the supporting justification to avoid confusion. EIA requires an assessment of all potential environmental and health impacts associated with a proposed development. It considers all potential risks, any measures to avoid these risks and suitable mitigation to reduce any remaining potential consequences. An EIA typically includes an assessment noise, ecology, transport, air quality, and archaeology and water issues, in line with national guidance. The role of EIA should be clearly stated in the policy and justification text. Planning Practice Guidance is clear on how noise should be addressed and therefore this policy or the supporting explanation should refer to such. IGas previously commented that this policy appears to address impacts on amenity rather than pollution and that the policy should recognise the role of other regulators, particularly for the purposes of onshore oil and gas as referred to above. For example, the EA or the Environmental Health Officer manages air quality; the EA protects ground water; and the Health and Safety Executive (HSE) is responsible for the administering borehole regulations. Issues such as noise can be appropriately mitigated or avoided in accordance with standards set out in Planning Practice Guidance and therefore should be better separated from a ‘Pollution’ policy. IGas notes there are no proposed changes to the Policy following initial consultation. Further, there is no acknowledgment or reference to the roles and responsibilities of other regulators in this Policy (or Policy 65) or their respective supporting explanations. It is considered the absence of such is at odds with national guidance. IGas would request the Council to carefully consider the wording of this policy to ensure the Plan is sound. Regarding noise impacts and lighting, Planning Practice Guidance is clear on how noise and other nuisance issues should be addressed and therefore this policy should clearly reference this guidance.

Policy 55 supported (in principle). Should identify EA role and responsibility in regulation to avoid confusion. The role of an EIA should be clearly stated in the policy and justification. The policy should recognise the role of other regulators particularly for onshore oil and gas (examples provided in representation). Policy should reference the NPPG on noise and other nuisances for guidance.

Comment noted. The role of regulators is covered in NPPG. (Paragraphs 014 and 110.) NPPF and NPPG not required to be duplicated in the Local Plan.
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Light pollution is only mentioned twice in the draft Plan. Whilst we agree that it is important that it is a consideration under the Planning proposals (Policy 55), a strategy to reduce the Borough’s overall light pollution should be a consideration of the Plan.

Response:
Comment noted. Considered Policy 55 meets NPPF and PPG requirements.
Comment:
Again there is no explanation of the council's position in relation to our previous representation, we therefore reiterate our previous comments. We would like the Council to include a requirement for developers to undertake a Preliminary Risk Assessment to be submitted along with any planning application for sites where any current or former uses may have led to land contamination, and offer the following suggested wording: Cont/d.. "should any proposed sites currently or previously have been subject to land-use(s) which have the potential to have caused contamination of the underlying soils and groundwater then any planning application must be supported by a Preliminary Risk Assessment to demonstrate that the risks posed to 'controlled waters' by any contamination are understood by the applicant and can be safely managed." We would also like to see the following comments included in the policy justification/ supporting text: It is recommend that developers consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed and refer to the contaminated land pages on GOV.UK for more information.

Summary:
Policy 56 - Contamination & Unstable Land - no response to previous comments and would like inclusion of requirement for developers to undertake a PRA where current/former uses may have led to land contamination - wording suggested.

Response:
Agree with the response and propose to include suggested wording verbatim as follows: Policy 56 - Part E (new criteria) E) should any proposed site, currently or previously, have been subject to land-use(s) which have the potential to have caused contamination of the underlying soils and groundwater then any planning application must be supported by a Preliminary Risk Assessment to demonstrate that the risks posed to 'controlled waters' by any contamination are understood by the applicant and can be safely managed. Explanatory text - para 13.23 (new para ref in light of change above) National planning policy states that any potentially contaminated or unstable land being assessed for development through the planning process should be dealt with at this stage ensuring that it poses no unacceptable risk to future occupiers or the wider environment. It is recommended that developers consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed and refer to the contaminated land pages on GOV.UK for more information.
| **Tests of Soundness** |  |  |  |  |

**Comment:**
The Coal Authority supports the inclusion of Policy 56: Contaminated and Unstable Land which requires applicants to demonstrate that they have considered the ground conditions and the land is suitable for its intended use

**Summary:**
supports the inclusion of Policy 56: Contaminated and Unstable Land

**Response:**
Comment noted
Tests of Soundness:

Comment:
We are supportive of policy 56, in particular Bullet point A: "demonstrating there is no significant harm, or risk of significant harm, to human health, or land, natural environmental, pollution of soil or any watercourse or groundwater," As detailed above the protection of water resources will be vital to the provision of sustainable new development.

Summary:
Support Policy 56, in particular Bullet point A: "demonstrating there is no significant harm, or risk of significant harm, to human health, or land, natural environmental, pollution of soil or any watercourse or groundwater," The protection of water resources will be vital to the provision of sustainable new development.

Response:
Support noted.
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**Comment:**

UKOOG Response: Policy 56 states; ‘Proposals will be required to mitigate contamination or land stability by: A) demonstrating there is no significant harm, or risk of significant harm, to human health, or land, natural environment, pollution of soil or any watercourse or ground water; B) ensuring necessary remedial action is undertaken to safeguard users or occupiers of the site or neighbouring land and protect the environment and any buildings or services from contamination during development and in the future; C) demonstrating that adverse ground conditions have been properly identified and safely treated; and; D) clearly demonstrating to the satisfaction of the Local Planning Authority, that the land is suitable for its proposed use’. Oil and Gas sites require a number of environmental permits from the EA before they can operate. These permits are only granted when it is proven that the methods (Best Available Techniques - BAT) being used at a particular site protect the environment from harm and potential contamination. All sites must be monitored for up to two years before site activities commence. This enables a baseline condition to be established, which forms the base environmental condition against which permits are then granted and operations subsequently measured. The results of operational monitoring collected during the life of the site are compared against this baseline to ensure there are no contamination issues. Therefore, it is our view that many of the issues presented in this policy are regulated by the EA, and this should be clearly stated in supporting justification text. Where a project is subject to an EIA all potential impacts on the environment and human health are routinely assessed and suitable avoidance or mitigation measures must be identified. This policy should state this and any justification text make it clear. Reference should also be made to PDR (Part K) for onshore oil and gas exploration sites, as these rights include for the identification of old mine workings which may have an impact on ground conditions and allow operators to gather evidence to inform their site selection and design.

**Summary:**

Policy 56. Comment. The issues presented in this policy are regulated by the EA, and this should be clearly stated in supporting justification text. The policy should state (and justification should clarify) ? Where a project is subject to an EIA all potential impacts on the environment and human health are routinely assessed and suitable avoidance or mitigation measures must be identified. Should refer to Permitted Development Right (Part K) 2015 (for old mine workings)

**Response:**

Policy 56 is not just aimed at hydrocarbon development proposals. Where required Planning and Pollution Control will work with and liaise with the EA when and where required as required by NPPF / NPPG The Local Plan is not required to repeat legislation, (including statutory instruments 596 part K), national policy or guidance. Coal Authority are a consultee, due to previous mining in Doncaster. The council also has the Coal Authority’s unstable land layer for reference and use in application decision making.
Oil and Gas sites require a number of environmental permits from the EA before they can operate. Permits are only issued when it has been demonstrated that the proposed methods to be used at a particular site protect the environment from harm and potential contamination using Best Available Techniques. All sites must be monitored for up to two years before site activities commence. This enables a baseline condition to be established against which permits are then issued and operations subsequently measured. The results of operational monitoring collected during the life of the site are compared against this baseline to ensure there are no contamination issues. Therefore, many of the criterion to this policy are regulated by the EA, and this should be clearly stated in the explanation.

**Summary:**

Policy 56 many criterion in the policy are regulated by the EA. This should be stated in the policy explanation.

**Response:**

Comment noted. The role of regulators is covered in NPPG. (Paragraphs 014 and 110.) NPPF and NPPG not required to be duplicated in the Local Plan.
We also believe there requires to be additional policies to specifically deal with the safeguarding of ancillary mineral development and transport infrastructure as required by NPPF para 204 (e) as follow: Railheads, rail links and wharves identified on the Policies Map, with a 250m buffer zone, will be safeguarded against development which would prevent or frustrate the use of the infrastructure for minerals or waste transport purposes, unless: i) The need for the alternative development outweighs the benefits of retaining the facility; and ii) Where the minerals or waste transport infrastructure is in active use on the land, a suitable alternative location can be provided for the displaced infrastructure; or iii) The infrastructure is not in use and there is no reasonable prospect of it being used for minerals or waste transport in the foreseeable future. Where development, other than exempt development as defined in the Safeguarding Exemption Criteria list, is proposed within an identified buffer zone the agent of change principle will be applied and permission will only be granted where adequate mitigation can, if necessary, be provided to reduce any impacts from the existing or proposed adjacent minerals or waste transport infrastructure uses to an acceptable level, and the benefits of the proposed use outweigh any safeguarding considerations. The suggested Safeguarding Exemption Criteria list is as follows; - Infilling in an otherwise built up frontage within a settlement - Householder applications within the curtilage of a property - Advertisement applications - Reserved matters applications - Applications for new or improved accesses - Minor extensions/alterations to existing uses/buildings which do not fundamentally change the scale and character of the use/building 'Temporary' development (for up to five years) - Agricultural buildings adjacent to existing farmsteads - 'Minor' works such as fences, bus shelters, gates, walls, accesses. - Amendments to current permissions (with no additional land take involved) - Changes of use - Applications for development on land which is already allocated in an adopted local plan where the plan took account of minerals and waste safeguarding requirements - Listed Building Consent and applications for planning permission for demolition in a conservation area - Applications for works on trees or removal of hedgerows - Prior notifications for telecommunications, forestry, agriculture and demolition - Redevelopment of previously developed land not increasing the footprint of the former development - Certificates of Lawfulness of Existing Use of Development and - Certificates of Lawfulness of Proposed Use or Development

Response:
No proposed additional policies. Minerals ancillary infrastructure (such as wharves) is protected through policy 62A.7 as required by NPPF para 204e. Applications pertaining to ancillary minerals infrastructure will be determined in line with NPPF / NPPG and relevant policies within the local plan. See also policy 13. D3 for wharf facilities and key waterways, which encourages improving the efficiency of freight transport by navigable waterways.
Tests of Soundness:

Comment:
We made a number of representations against the different policies for Mineral Sites relating to groundwater protection, which do not appear to have been addressed and are not detailed in the consultation statement. Groundwater, and particularly source protection zones, are particularly susceptible to adverse effects of mineral workings and restoration. We ask the council to provide their response to our previous representations.

Summary:
Minerals Developments General Comments - we made a number of comments against the minerals policies relating to groundwater protection which have not been accepted

Response:
Noted - it is considered that Policy 55 amendments as per the above provides a strong policy framework (noting that Policy 61 also relates to SPZs) for all development, including minerals, so our response to Policy 55 now should address these concerns as well as all policies in the plan where relevant will be applied.
Comment Ref: C/Climate Change/01880/6/001

Name: Mr John Hoare

Date: 26/09/2019

Organisation: 

Representing: 

Comment Ref: C/Climate Change/01880/6/001

Attend Examination: Not Stated

Reason: 

Area: Chapter 14: Climate Change, Mineral Resources & Energy

Policy: Minerals

Tests of Soundness: 

Comment:
In many respects this is an excellent plan but it fails to recognise that Climate Change, probably the most urgent issue of the age, requires attention across the board and that its mitigation requires action far beyond the types of drainage, floods and low carbon energy generation. Transport is increasingly the main producer of carbon emissions while other areas of the economy are seeing reductions. Nevertheless increases in transport infrastructure are supported. In particular the endorsement of Doncaster Sheffield Airport’s development proposals runs contrary to any policy to reduce the damage of climate change. This represents a serious contradiction at the heart of the Plan.

Summary:
Legally compliant - no comment Sound - no comment  The plan fails to recognise that climate change requires attention across all areas, not just flooding, drainage and low carbon energy generation. Transport is a high producer of carbon emissions but other areas of the economy are seeing reductions. Endorsing DSA is contrary to any policy to reduce the damage of climate change and is a 'serious contradiction' of the plan.

Response:
Comment noted. Local Plan paragraph 14.2 identifies how the plan will help Doncaster adapt to climate change
We also believe there requires to be additional policies to specifically deal with the safeguarding of ancillary mineral development and transport infrastructure as required by NPPF para 204(e) as follow: Minerals ancillary infrastructure sites identified on the Policies Map, with a 250m buffer zone, will be safeguarded against development which would prevent or frustrate the use of the site for minerals ancillary infrastructure purposes, unless: i) The need for the alternative development outweighs the benefits of retaining the site; and ii) Where minerals ancillary infrastructure is in active use on the land, a suitable alternative location can be provided for the displaced infrastructure; or iii) The site is not in use and there is no reasonable prospect of it being used for minerals ancillary infrastructure in the foreseeable future. Where development, other than exempt development as defined in the safeguarding exemption criteria list, is proposed within an identified buffer zone the agent of change principle will apply and permission will only be granted where adequate mitigation can, if necessary, be provided to reduce any impacts from the existing or proposed adjacent minerals ancillary infrastructure uses to an acceptable level, and the benefits of the proposed use outweigh any safeguarding considerations.

Response:
No proposed additional policies. Minerals ancillary infrastructure protected through policy 62A.7 as required by NPPF para 204e. Applications pertaining to ancillary minerals infrastructure will be determined in line with NPPF/NPPG and relevant policies within the local plan.
Marr Parish Council considered it vital to assess the value of minerals before any development takes place and that the impact on the environment, landscape, and local communities is fully understood. They agreed with DMBC that no homes should be developed near potential Mineral sites which may hamper or prevent extraction. They thought this was a sensible approach.

**Marr Parish considers that it is vital to assess the value of minerals before any development takes place and the impact on environment, landscape and local communities is fully understood. We agree with DMBC that no homes should be developed near potential Mineral sites which may hamper or prevent extraction. We think this is a sensible approach.**

**Summary:**

It is vital to assess the value of minerals before any development takes place and the impact on environment, landscape and local communities is fully understood. No homes should be developed near potential mineral sites which may hamper or prevent extraction.

**Response:**

Comment Noted
FCC supports the following statements in paragraphs 14.33, 14.53 and 14.54 in the Local Plan Publication Draft: “Minerals, such as sand and gravel, limestone and clay are essential to meeting society’s needs for economic growth and development” (para 14.33).

Response:
Support noted.
FCC supports the following statements in paragraphs 14.33, 14.53 and 14.54 in the Local Plan Publication Draft: "Minerals Safeguarding Areas are areas of known mineral resources that are considered to be of sufficient economic or conservation value to warrant protection beyond the plan period? Doncaster’s Mineral Safeguarding Areas have been developed using an agreed methodology which assesses the best available geological and mineral resource information against a variety of issues and constraints modified from our sustainability appraisal criteria" (para 14.53).

Summary:
FCC supports the following statements in paragraphs 14.33, 14.53 and 14.54 in the Local Plan Publication Draft: "Minerals Safeguarding Areas are areas of known mineral resources that are considered to be of sufficient economic or conservation value to warrant protection beyond the plan period? Doncaster’s Mineral Safeguarding Areas have been developed using an agreed methodology which assesses the best available geological and mineral resource information against a variety of issues and constraints modified from our sustainability appraisal criteria" (para 14.53).

Response:
Support noted.
FCC supports the following statements in paragraphs 14.33, 14.53 and 14.54 in the Local Plan Publication Draft: “Doncaster has considerable mineral resources within the Magnesium Limestone ridge - between Barnsdale Bar in the north and Stainton in the south?” (para 14.54).

Summary:
FCC supports the following statements in paragraphs 14.33, 14.53 and 14.54 in the Local Plan Publication Draft: “Doncaster has considerable mineral resources within the Magnesium Limestone ridge - between Barnsdale Bar in the north and Stainton in the south?” (para 14.54).

Response:
Support noted.
Comment:
The majority of the Doncaster area is served by Yorkshire Water and Severn Trent Water. Anglian Water is the sewerage undertaker for part of Doncaster Borough only (parishes of Auckley, Austerfield, Blaxton and Finningley) within and close to Doncaster Sheffield Airport. We are also the water undertaker for part of Finningley Parish. The following comments are submitted on behalf of Anglian Water and relate to our company area only. We note that a number of changes have been made to Policy 57 of the Local Plan to address comments made by Anglian Water as part of the previous consultation. Anglian Water is generally supportive of the wording as proposed but would ask that reference be made to detriment where it proposed to discharge surface water into the public sewerage network as a last resort. The proposed additional wording as set out below would ensure that Policy 57 is effective where a connection to the public sewerage network is required by ensuring the risk of flooding within the surface water sewerage network is considered at application stage. PROPOSED CHANGE It is therefore proposed that the following wording is added to Policy 57 (to follow Point E): "Where an existing surface water sewer is utilised there must be no detriment to the users of the existing sewer"

Summary:
Policy 57 should be amended to ensure that where a connection to the public sewerage network is required the risk of flooding within the surface water sewerage network is considered at application stage. The following should be added to follow Criterion E: 'Where an existing surface water sewer is utilised there must be no detriment to the users of the existing sewer'
We welcome the identification in part F) of the potential for drainage to our watercourses, and the requirement for prior approval of the navigation authority. The Trust do allow drainage into our network, where practical and where a necessary license and agreement can be made.

Response:
Support noted.
<table>
<thead>
<tr>
<th>Comment Ref:</th>
<th>C/Policy 57/03431/1/020</th>
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</thead>
<tbody>
<tr>
<td>Name:</td>
<td>Persimmon Homes (Yorkshire) Ltd</td>
</tr>
<tr>
<td>Organisation:</td>
<td>Persimmon Homes (Yorkshire) Ltd</td>
</tr>
<tr>
<td>Date:</td>
<td>26/09/2019</td>
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<tr>
<td>Reason:</td>
<td>We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.</td>
</tr>
<tr>
<td>Area:</td>
<td>Chapter 14: Climate Change, Mineral Resources &amp; Energy</td>
</tr>
<tr>
<td>Policy:</td>
<td>Policy 57: Drainage</td>
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<tr>
<td>Tests of Soundness:</td>
<td></td>
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</table>

**Comment:**

Part D of this policy seeks an outright prevention of new culverting of existing watercourses. In designing development proposals, we would always seek to avoid culverting, however, there are times when it may be necessary to culvert (for example, to achieve a safe access point). This policy should be re-worded to provide sufficient flexibility so that the impact of culverting can be judged on a case-by-case basis.

**Summary:**

Part D of Policy 57 seeks an outright prevention of new culverting of existing watercourses. In designing development proposals, we would always seek to avoid culverting. However, there are times when it may be necessary to culvert (for example, to achieve a safe access point). This policy should be re-worded to provide sufficient flexibility so that the impact of culverting can be judged on a case-by-case basis.

**Response:**

DMBC have an anti-culverting policy in order to avoid the challenging maintenance involved with culverts and to aid ease of inspection. The policy states the we aim to avoid new culverting therefore, however we would take any application on a case by case basis and, if culverting is the only practicable option, this would be permitted.
We are supportive of policy 57. It is essential that for the long term management of a sewerage system and development of a sustainable water cycle that surface water run off is controlled in an appropriate way, the utilisation of SuDS represent the most sustainable and adaptable approach. Where SuDS are implemented correctly, they can provide wider benefits through improved water quality, biodiversity and amenity. The implementation of SuDS can help to provide open and green space or corridors that help to provide a sense of place and setting for new development. Policy 57, continues on to highlight the use of the Drainage Hierarchy. Directing surface water to sustainable outfalls such as infiltration or watercourses, is preferable to connecting to the public sewerage system.

Supports Policy 57. It is essential that for the long term management of a sewerage system and development of a sustainable water cycle that surface water run off is controlled in an appropriate way, the utilisation of SuDS represent the most sustainable and adaptable approach. Where SuDS are implemented correctly, they can provide wider benefits through improved water quality, biodiversity and amenity. The implementation of SuDS can help to provide open and green space or corridors that help to provide a sense of place and setting for new development. Policy 57, continues on to highlight the use of the Drainage Hierarchy. Directing surface water to sustainable outfalls such as infiltration or watercourses, is preferable to connecting to the public sewerage system.

Response:
Support noted.
UKOOG Response: Site drainage for onshore oil and gas sites is required through permitting by the EA. This is achieved through a containment plan, which details any surface water management requirements for the site. Reference to the role of the EA in requiring such plans should be made in the justification text.

**Summary:**
Comment noted. Policy 57 relates to all development proposals not just oil and gas. The role of the EA is identified in PPG 012 (which also says the planning authority and other regulators are separate but complementary.

**Response:**
Comment noted. Policy 57 relates to all development proposals not just oil and gas. The role of the EA is identified in PPG 012 (which also says the planning authority and other regulators are separate but complementary.
Comment Ref:  C/Policy 57/05129/1/017
Attend Examination:  Not Stated
Reason:
Area:  Chapter 14: Climate Change, Mineral Resources & Energy
Policy:  Policy 57: Drainage

Tests of Soundness:

Comment:
Site drainage for onshore oil and gas sites is required through permitting by the EA. This is achieved through a containment plan, which details any surface water management requirements for the site. Reference to the role of the EA in requiring such plans should be made in the explanation.

Summary:
Policy 57. Site drainage for onshore oil and gas is permitted through EA. This should be identified in policy explanation

Response:
Comment noted. The role of regulators is covered in NPPG. (Paragraphs 014 and 110 for hydrocarbons.) NPPF and NPPG is not required to be duplicated in the Local Plan.
**Comment Ref:** C/Policy 57/05289/1/020  
**Attend Examination:** Attend Hearing  
**Reason:** We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

**Area:** Chapter 14: Climate Change, Mineral Resources & Energy  
**Policy:** Policy 57: Drainage

**Comment:**

Part D of this policy seeks an outright prevention of new culverting of existing watercourses. In designing development proposals, we would always seek to avoid culverting, however, there are times when it may be necessary to culvert (for example, to achieve a safe access point). This policy should be re-worded to provide sufficient flexibility so that the impact of culverting can be judged on a case-by-case basis.

**Summary:**

Part D of Policy 57 seeks an outright prevention of new culverting of existing watercourses. In designing development proposals, we would always seek to avoid culverting. However, there are times when it may be necessary to culvert (for example, to achieve a safe access point). This policy should be re-worded to provide sufficient flexibility so that the impact of culverting can be judged on a case-by-case basis.

**Response:**

DMBC have an anti-culverting policy in order to avoid the challenging maintenance involved with culverts and to aid ease of inspection. The policy states the we aim to avoid new culverting therefore, however we would take any application on a case by case basis and, if culverting is the only practicable option, this would be permitted.
Comment Ref: C/Policy 57/05290/1/020
Organisation: Persimmon Homes
Date: 26/09/2019

Attend Examination: Attend Hearing

Reason: We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Area: Chapter 14: Climate Change, Mineral Resources & Energy
Policy: Policy 57: Drainage

Tests of Soundness:

Comment:
Part D of this policy seeks an outright prevention of new culverting of existing watercourses. In designing development proposals, we would always seek to avoid culverting, however, there are times when it may be necessary to culvert (for example, to achieve a safe access point). This policy should be re-worded to provide sufficient flexibility so that the impact of culverting can be judged on a case-by-case basis.

Summary:
Part D of this policy seeks an outright prevention of new culverting of existing watercourses. In designing development proposals, we would always seek to avoid culverting, however, there are times when it may be necessary to culvert (for example, to achieve a safe access point). This policy should be re-worded to provide sufficient flexibility so that the impact of culverting can be judged on a case-by-case basis.

Response:
DMBC have an anti-culverting policy in order to avoid the challenging maintenance involved with culverts and to aid ease of inspection. The policy states the we aim to avoid new culverting therefore, however we would take any application on a case by case basis and, if culverting is the only practicable option, this would be permitted.
<table>
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<tr>
<th>Tests of Soundness:</th>
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<tbody>
<tr>
<td>Comment:</td>
<td>Although there is no reference in the consultation summary to our representation on this policy, we note that many of the points we raised have been taken into account. However, the following point has not been addressed and we welcome the council’s comments in response to it: &quot;Bullet point C) sets out requirements for the area of search for applying the sequential test for proposals outside of the Development Allocations. In relation to housing and B1 &amp; B2 use classes, the area of search appears to be limited to the same settlement. We are unclear as to why this is, and ask for clarification on why the area has been limited. If sufficient land has been allocated for local housing need, any windfall sites should be considered first against the district wide boundary unless DMBC can justify otherwise.&quot;</td>
</tr>
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<td>Summary:</td>
<td>Policy 58 - Flood Risk Management - previous comments on justification for applying the flood risk sequential test to individual settlements (Part c of the policy) as part of windfall development not justified</td>
</tr>
<tr>
<td>Response:</td>
<td>Para 9.4 of the Flood Risk Topic Paper referred to this part of the policy and directs to Appendix 2 of the Topic Paper for where the justification of this policy approach has been set out following the response made to the 2018 consultation that this is required.</td>
</tr>
</tbody>
</table>
"Proposals in flood zones 2 or 3a (or other significant sources of flood risk such as surface water flooding) outside of Development Allocations will need to identify whether there are any alternative and reasonably available sites, normally in the areas specified in the policy, that are sequentially preferable to satisfy the Sequential Test." As per our comments to Policy 58, development within flood zones, development in low-lying areas such flood zones can result in increased deterioration and ineffective sewerage systems, particularly where surface water sewers are designed to outfall to the watercourse, the lack of sufficient elevation to create the hydraulic pressure to flow out into the watercourse can result in flooding from the sewers.

Response:
Noted - this will need to be considered as part of any planning application from such proposals.
We are supportive of the principle to consider the risk of flooding when determining if a site is suitable for development. Development within flood plain, not only has the risk of flooding properties, or causing access issues, but it can also result in increased deterioration of underground assets such as sewers.

Response:
Support noted.
Comment Ref: C/Policy 58/05294/1/011

Attend Examination: Attend Hearing

Reason: To fully represent our clients land interest and respond to matters that may be raised at the hearing sessions. Please refer to accompanying representation 'Doncaster Local Plan Representations to Draft Doncaster Local Plan - Publication Draft' (September 2019) on behalf of Don Parkinson Partnership (doc ref. 60752/01/JG/AK).

Area: Chapter 14: Climate Change, Mineral Resources & Energy

Policy: Policy 58: Flood Risk Management

Tests of Soundness: Positively prepared Justified Legally Compliant Effective Consistent with national

Comment:

6.1 This section reviews other draft policies in the emerging Local Plan which are relevant to major housing development. 6.6 Draft Policy 58 sets out the approach the Council will take when considering development proposals within areas of flood risk. Don Parkinson supports the Council’s approach in respect of identifying areas of search when undertaking Sequential Tests. It is considered appropriate that the Council is seeking to confine areas of search within the same settlement.

Summary:

Policy 58 - policy is supported. It is appropriate that the Council is seeking to confine areas of search within the same settlement.

Response:

Noted and support welcomed
| CUSREF: | 05295 | Name: | Lichfields |
| Date: | 30/09/2019 | Organisation: | Lichfields |
| | | Representing: | Don Parkinson Partnership |
| Comment Ref: | C/Policy 58/05295/1/011 | | |
| Attend Examination: | Attend Hearing | | |
| Reason: | To fully represent our clients land interest and respond to matters that may be raised at the hearing sessions. Please refer to accompanying representation 'Doncaster Local Plan Representations to Draft Doncaster Local Plan - Publication Draft' (September 2019) on behalf of Don Parkinson Partnership (doc ref. 60752/01/JG/AK). | | |
| Area: | Chapter 14: Climate Change, Mineral Resources & Energy | | |
| Policy: | Policy 58: Flood Risk Management | | |
| Tests of Soundness: | Positively prepared | Effective | Legally Compliant |
| | Justified | Consistent with national | |
| Comment: | 6.1 This section reviews other draft policies in the emerging Local Plan which are relevant to major housing development. 6.6 Draft Policy 58 sets out the approach the Council will take when considering development proposals within areas of flood risk. Don Parkinson supports the Council’s approach in respect of identifying areas of search when undertaking Sequential Tests. It is considered appropriate that the Council is seeking to confine areas of search within the same settlement. | | |
| Summary: | Policy 58 - policy is supported. It is appropriate that the Council is seeking to confine areas of search within the same settlement. | | |
| Response: | Noted and support welcomed | | |
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Summary:
Policy 58 - policy is supported. It is appropriate that the Council is seeking to confine areas of search within the same settlement.

Response:
Noted and support welcomed
6.1 This section reviews other draft policies in the emerging Local Plan which are relevant to major housing development. 6.6 Draft Policy 58 sets out the approach the Council will take when considering development proposals within areas of flood risk. Don Parkinson supports the Council’s approach in respect of identifying areas of search when undertaking Sequential Tests. It is considered appropriate that the Council is seeking to confine areas of search within the same settlement.

Summary:
Policy 58 - policy is supported. It is appropriate that the Council is seeking to confine areas of search within the same settlement.

Response:
Noted and support welcomed
Comment Ref: C/Policy 59/0016/28/034
Name: Historic England
Date: 04/09/2019
Organisation: Historic England
Reason:
Attend Examination: Not Stated
Area: Chapter 14: Climate Change, Mineral Resources & Energy
Policy: Policy 59: Low Carbon & Renewable Energy

Tests of Soundness:

Comment:
Inappropriately-sited or poorly-designed low carbon and renewable energy developments can harm elements which contribute to the significance of heritage assets in their vicinity. Therefore, we support Criterion B5 of this Policy that, in all cases, low carbon and renewable energy proposals should have no significant adverse impacts, including cumulative impacts, on the built and natural environment (including landscape character, and historic assets). This will help to support the Plan's Objectives regarding the historic environment.

Summary:
'Sound'. Inappropriately-sited or poorly-designed low carbon and renewable energy developments can harm elements which contribute to the significance of heritage assets in their vicinity. Therefore, we support Criterion B5 of this Policy that, in all cases, low carbon and renewable energy proposals should have no significant adverse impacts, including cumulative impacts, on the built and natural environment (including landscape character, and historic assets). This will help to support the Plan's Objectives regarding the historic environment.

Response:
Support welcomed
Unsound because: - Not positively prepared to address national carbon reduction targets; no low carbon/renewable energy (RE) generation targets set - Not justified in relation to the available evidence, notably the Committee on Climate Change's report on meeting net carbon zero (May 2019) - Not effective: is unlikely to help deliver the radical carbon reductions necessary nor contribute sufficient low carbon energy, in part due to no targets/milestones being set; does not encourage or prioritise community energy schemes as a mechanism to address the concerns of affected local communities nor empower them to help shape their local energy response - Is not consistent with national targets (CCC five year carbon budgets) to radically reduce carbon emissions by 2035 The radical reductions in carbon emissions now required by the national policy to meet a net zero carbon target by 2050 will require the mass deployment of a wide range of low carbon solutions. In turn this will require the engaged consent of communities, enabled by participative decision-making and effective strategic spatial planning of renewable energy assets at local and supra-local levels. To allow planning to deliver net carbon zero as a priority (and the proportionate reductions within the plan period, contributing to the carbon budgets set by the CCC), the Borough must set measurable targets for low carbon energy production (including renewables), based on a landscape capacity-led approach. This has been done for wind, although no targets have been set, but would need to be more comprehensive, including biomass, solar, hydro and a range of other options, based on the natural resources of the Borough. It is unclear how proposals for large scale forestry (see A)1.) will meet the aspirations of this policy and this needs to be clarified. Paragraph 14.13 states 'In particular there is a significant opportunity for solar power schemes to be installed on the roofs of existing and planned large scale commercial and employment developments across the Borough'. Simple text encouragement to fit or retrofit onto commercial and employment developments is not sufficient - this must be mandated by complementary policies for new and existing developments within Policy 47: Design of Non-Residential, Commercial and Employment Developments (p.141). PROPOSED CHANGE Alter pre-ambles text: ‘We aim to increase the supply of low carbon and renewable energy generated in the Borough to at least xx GW installed capacity by 2035, to contribute to meeting the carbon reductions set out in national carbon budgets, and in accordance with the principles set out below.’ Add new policy criterion: A) 6. Community energy schemes where either local ownership (in part or whole) or significant community benefits are demonstrated. And amend: B) 1. are community owned (in part or whole) or have the engaged consent of communities and demonstrate how they will deliver environmental, social and economic benefits;

Summary:
Unsound as it: - is not positively prepared to address national carbon reduction targets; no low carbon / renewable energy generation targets set. - not justified in relation to the available evidence, especially the Committee on Climate Changes report on meeting net carbon zero by 2050. - is ineffective - unlikely to help deliver the radical carbon reductions needed or contribute enough to low energy. No targets / milestones have been set and it does not encourage or prioritise community engagement in community energy schemes - inconsistent with national targets (CCC five year carbon budgets) to radically reduce carbon emissions by 2035. Radical reductions in carbon emissions required by national policy will require a range of low carbon solutions and the engagement of communities and effective planning of renewable energy assets at local / supra local levels. To allow planning to deliver net carbon zero as a priority, and proportionate reductions in the plan period related to net zero carbon, the borough must set measurable targets for low carbon energy production, based on a landscape capacity approach. This has been done for wind, although no targets have been set, but would need to be more comprehensive, including biomass, solar, hydro and a range of other options, based on the natural resources of the Borough. It is unclear how proposals for large scale forestry (see A)1.) will meet the aspirations of this policy and this needs to be clarified. Text relating to solar panels (14.13) re: retrofitting solar is not sufficient, this must be mandated by complementary policies for new and existing developments within Policy 47: Design of Non-Residential, Commercial and Employment Developments (p.141). Proposed change: Alter pre-ambles text: ‘We aim to increase the supply of low carbon and renewable energy generated in the Borough to at least xx GW installed capacity by 2035, to contribute to meeting the carbon reductions set out in national carbon budgets, and in accordance with the principles set out below.’ Add new policy criterion: A) 6. Community energy schemes where either local ownership (in part or whole) or significant community benefits are demonstrated. And amend: B) 1. are community owned (in part or whole) or have the engaged consent of communities and demonstrate how they will deliver environmental, social and economic benefits;

Response:
As far as the Council is aware, there is no requirement for LPAs to set renewable energy generation targets in the Planning and Compulsory Purchase Act 2004 or the NPPF. The NPPG specifically says ‘Whilst local authorities should design their policies to maximise renewable and low carbon energy development, there is no quota which the Local Plan has to deliver’ (para 003). It is considered policies 59 and 60 alongside other Local Plan policies, provide a supportive framework. They provide a positive strategy for energy from renewable and low carbon energy sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily. Suitable areas for renewable and low carbon energy sources are identified on the policies map including areas of search for wind energy and heat opportunity areas. Policy 47 b has a requirement that all new major development developments must provide 10% of their energy from renewable sources and Large footprint buildings should ensure roofs are designed to accommodate the potential for solar panel arrays. The NPPF states at 152...
Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning. It is not therefore considered necessary to repeat this under the Local Plan policy. However it is acknowledged the policies could be reframed to better support community energy schemes. In this respect policy 59A could be amended to read: A) Proposals will be supported which give priority to: 1. Community energy schemes that are in full or part community ownership; 2. biomass and energy crop schemes especially to the north and south east of the main urban area, for example mixed woodland, single species short rotation forestry and large-scale forestry, outside of areas of high quality arable farmland; 3. heat or power generation from light, water, waste and other low carbon heat sources; 4. landfill and sewage gas energy generation schemes; 5. wind power projects which meet the criteria of Policy 60; and 6. micro-renewable energy technologies and decentralised heat and power systems within new development.

**Comment Ref:** C/Policy 59/03089/4/007

**Name:** Canal & River Trust

**Organisation:** Canal & River Trust

**Reason:**

**Area:** Chapter 14: Climate Change, Mineral Resources & Energy

**Policy:** Policy 59: Low Carbon & Renewable Energy

**Comment:**

We welcome the identification that heat or power generation can be sought from water within part A). The Trust does have agreements with landowners nationally to utilise our water for the use by water coursed heating systems. The water flowing through our waterways contains enough thermal energy to produce approximately 640 MW of energy. Our waterway network is included in the National Heat Map produced by the Department of Energy & Climate Change (now Department for Business, Energy & Industrial Strategy). It provides an overview of the opportunity that exists across the country. Identification of the many sources of renewable energy production could make it clearer to decision makers as to how the aims of paragraphs 148 and 151 of the National Planning Policy Framework can be met. This would make the Local Plan more effective.

**Summary:**

We welcome the identification that heat or power generation can be sought from water within part A). The Trust does have agreements with landowners nationally to utilise our water for the use by water coursed heating systems. The water flowing through our waterways contains enough thermal energy to produce approximately 640 MW of energy. Our waterway network is included in the National Heat Map produced by the Department of Energy & Climate Change (now Department for Business, Energy & Industrial Strategy). It provides an overview of the opportunity that exists across the country. Identification of the many sources of renewable energy production could make it clearer to decision makers as to how the aims of paragraphs 148 and 151 of the National Planning Policy Framework can be met. This would make the Local Plan more effective.

**Response:**

Support noted.
Comment:

In the Local Plan proposals, Doncaster describes how it will strive to be a leader in Renewable Energy. Marr Parish believes this to be an admiral objective & is still one that it would like to support, however, it has major concerns on how DMBC are to achieve this status. Scarring the Greenbelt Landscape with Wind Turbines Solar Panel Farms is an issue we strongly object to. If DMBC are to deliver this objective then perhaps compulsory Solar installations on all new builds could be the first step, followed by suitable large Roof Tops e.g: Industrial, Commercial & Agricultural buildings & large shed structures and a managed roll out of residential roof spaces. Thus utilising, existing, vast redundant acres of space. This would be fully aligned to the Borough’s Vision, Aims and Objectives. Until we maximise & exhaust the opportunities that currently exist, we cannot support any proposal to cover valuable Greenbelt or Agricultural Land.

Summary:

Support is given to the delivery of Renewable Energy. However, concern is expressed how this will be achieved is this is to mean delivery by wind turbines and solar panel farms on Green Belt land. Would prefer to see solar installations on all new builds, large roof tops, e.g: Industrial, Commercial & Agricultural buildings and large shed structures and a managed roll out of residential roof spaces.

Response:

Support and concerns noted. The wind energy policy 60 seeks to direct wind turbines to areas with the most capacity to accommodate them, including land outside the green belt. Policy 47 b has a requirement that all new major commercial developments must provide 10% of their energy from renewable sources and Large footprint buildings should ensure roofs are designed to accommodate the potential for solar panel arrays. The most efficient way of reducing residential energy use is through enhanced insulation / fabric efficiency which it is anticipated will be improved over coming years through the building regulation changes indicated by Government and green initiatives for existing homes such as was implemented previously through the green deal. Local Plan policy 59A5 supports and prioritises micro-renewable energy schemes.
Comment:
We previously highlighted that bullet point I) should include reference to other waterways in addition to canals. This has not been included in the publication draft version, and there is no explanation in the consultation summary.

Response:
Noted and agree, proposed to make minor amendment to policy text as follows: I) any proposed turbine would be setback from any highway boundary, railway line, canal or other waterway, public footpath or bridleway by a sufficient distance to be safe; and,
Comment:

Inappropriately-sited or poorly-designed wind energy developments can harm elements which contribute to the significance of heritage assets potentially at some distance from the development itself. We support Criterion E of this Policy that, in all cases, wind energy proposals should have no significant adverse impacts, including cumulative impacts, on the built and natural environment (including landscape character, and historic assets). This will help to support the Plan’s Objectives regarding the historic environment.

Summary:

'Sound'. Inappropriately-sited or poorly-designed wind energy developments can harm elements which contribute to the significance of heritage assets potentially at some distance from the development itself. We support Criterion E of this Policy that, in all cases, wind energy proposals should have no significant adverse impacts, including cumulative impacts, on the built and natural environment (including landscape character, and historic assets). This will help to support the Plan’s Objectives regarding the historic environment.

Response:

Support welcomed
Unsound because: - Not positively prepared to address national carbon reduction targets; no generation targets set - Not justified in relation to the available evidence, notably the Committee on Climate Change’s report on meeting net carbon zero (May 2019) - Not effective: is unlikely to help deliver the radical carbon reductions necessary or contribute sufficient low carbon energy, in part due to no targets/milestones being set; does not encourage or prioritise community energy schemes as a mechanism to address the concerns of affected local communities nor empower them to help shape their local energy response; the Plan does not highlight the full range of landscape capacity types (or spatial areas) over the whole borough - Is not consistent with national targets (carbon budgets) to radically reduce carbon emissions by 2035 We also query, and require clarification of, the meaning of ‘directed towards’ the respective landscape capacity areas in 60 A and B). Once applications are submitted, they will either be largely within or without the defined capacity areas. It is unclear what the burden on the scheme proposer is. Text at 14.19 refers readers to Figure 13. We believe it is also necessary to reproduce the full Landscape Capacity for Windpower plan (Figure 10 in the 2006 ECUS study; shown at Appendix A in the supporting document Wind Energy Development Policy: Local Plan Evidence Base (DMBC, July 2019) to ensure clarity regarding the borough wide sensitivity analysis. PROPOSED CHANGE Amend criterion: J) schemes are in full or part community ownership or have the engaged consent of communities and it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.

Summary:
Unsound as it: - is not positively prepared to address national carbon reduction targets; no low carbon / renewable energy generation targets set. - not justified in relation to the available evidence, especially the Committee on Climate Changes report on meeting net zero carbon by 2050. - is ineffective - unlikely to help deliver the radical carbon reductions needed or contribute enough to low energy. No targets / milestones have been set and it does not encourage or priorities community engagement in community energy schemes - inconsistent with national targets (CCC five year carbon budgets) to radically reduce carbon emissions by 2035. Clarification needed on the meaning of "directed towards" the respective landscape capacity areas in 60 A and B. Once applications are submitted, they will either be largely within or without the defined capacity areas. It is unclear what the burden on the scheme proposer is. Text at 14.19 refers readers to Figure 13. We believe it is also necessary to reproduce the full Landscape Capacity for Wind power plan (Figure 10 in the 2006 ECUS study; shown at Appendix A in the supporting document Wind Energy Development Policy: Local Plan Evidence Base (DMBC, July 2019) to ensure clarity regarding the borough wide sensitivity analysis. Proposed change: Amend criterion: J) schemes are in full or part community ownership or have the engaged consent of communities and it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.

Response:
As far as the Council is aware, there is no requirement for LPA’s to set renewable energy generation targets in the Planning and Compulsory Purchase Act 2004 or the NPPF. The NPPG specifically says ‘Whilst local authorities should design their policies to maximise renewable and low carbon energy development, there is no quota which the Local Plan has to deliver’ (para 003). It is considered policies 59 and 60 alongside other Local Plan policies, provide a supportive framework. They provide a positive strategy for energy from renewable and low carbon energy sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily. Suitable areas for renewable and low carbon energy sources are identified on the policies map including areas of search for wind energy and heat opportunity areas. Policy 60 A is very clear that medium to large-scale proposals are directed toward areas with the highest relative landscape capacity within the Area of Search for Wind Energy Developments as shown on the Policies Map. The NPPF states at 152 ‘Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning’. It is not therefore considered necessary to repeat this under the Local Plan policy. However it is acknowledged the policies could be reframed to better support community energy schemes. In this respect policy 59A could be amended to read: A) Proposals will be supported which give priority to: 1. Community energy schemes that are in full or part community ownership; 2. biomass and energy crop schemes especially to the north and south east of the main urban area, for example mixed woodland, single species short rotation forestry and large-scale forestry, outside of areas of high quality arable farmland;
Comment Ref: C/Policy 60 (i) and (jj)/01263/5/001
Name: Jill Samuels


Attend Examination: Attend Hearing

Reason: Because the local residents views have been ignored.

Area: Chapter 14: Climate Change, Mineral Resources & Energy
Policy: Policy 60: Wind Energy Developments

Tests of Soundness: Positively prepared Effective Legally Compliant

Justified Consistent with national

Comment:
As described in the Parish Council’s previous consultation submission. Other than the river Don floodbank the proposed area adjacent to Barnby Dun is very low lying with no woodland and is extremely close to the canal and village with its public rights of way and housing. The Parish Council suggested that any development should be sited to the west of the river Don floodbank and this submission has inadequately been addressed even though the Parish Council was asked to be fully engaged in the process. PROPOSED CHANGE Revising the proposed site boundary to the west of the river Don floodbank ensures that local residents have been fully engaged in the process and their views adequately addressed.

Summary:
Legally compliant - no Sound - no (not positively prepared, not effective) The Parish Council suggested that any development should be sited to the west of the river Don flood bank and this submission has inadequately been addressed even though the Parish Council was asked to be fully engaged in the process. Site boundary should be revised and residents have been ignored.

Response:
No evidence has been provided to demonstrate why this change would be needed and it is considered that the policy 60 criteria are robust enough to manage any negative impacts on local communities. It is clear the local community would prefer to see the area of search boundary further from the edge of the settlement to the west of the Don flood defences and this would need to be considered as part of the community engagement policy 60 requires.
Comment Ref: C/Policy 60/0198/2/003

Name: Network Rail
Organisation: Network Rail
Representing: 

Date: 30/09/2019

Reason: 

Area: Chapter 14: Climate Change, Mineral Resources & Energy
Policy: Policy 60: Wind Energy Developments

Tests of Soundness: 

Comment: 

Network Rail is supportive of the policies identified above: Policy 60 - is sound in that it provides adequate protection for rail infrastructure from wind development

Summary: 

Network Rail is supportive of Policy 60 - it is sound in that it provides adequate protection for rail infrastructure from wind development

Response: 

Support noted.
Tests of Soundness:

Comment:
The policy states locations where windfarms will be permitted and identifies an area of search in the map. (fig 13, p 163). There is no mention of where permission has already been granted for windfarms. Doncaster’s Infrastructure Strategy Annex 2019 states that planning permission has been granted for a windfarm at Clayton. The Local Plan is misleading by omission, because, if indeed planning permission has been granted, then the Local Plan should say so. However, it may be that the land is safeguarded because of the proposed HS2 Phase 2b route. If so, the Local Plan should state this is the case.

Summary:
The policy states locations where windfarms will be permitted and identifies an area of search in the map. (fig 13, p 163). There is no mention of where permission has already been granted for windfarms. Doncaster’s Infrastructure Strategy Annex 2019 states that planning permission has been granted for a windfarm at Clayton. The Local Plan is misleading by omission, because, if indeed planning permission has been granted, then the Local Plan should say so. However, it may be that the land is safeguarded because of the proposed HS2 Phase 2b route. If so, the Local Plan should state this is the case.

Response:
Don’t agree that the Local Plan needs to list existing permissions, but a clearer list in the Infrastructure Strategy would be useful. If the windfarm at Clayton is affected by the HS2 line, it is a statement of fact, but the Local Plan does not need to say this as it does not need to identify existing permissions but set out a future strategy and policy for wind energy.
Comment:

With regards to the proposed site for wind turbines that stretches from Stainforth to Bentley. These shouldn’t be situated so close to villages. Prevailing wind levels dictate suitable locations, but these should be kept far away from communities. With Barnby Dun in particular they should be located to the west of Thorpe Marsh. ‘A significant distance’ is unacceptable and should be defined in the Local Plan.

Summary:

The area of search for wind turbines/actual turbines themselves should not be located so close to villages and communities. Should be located to the west of Thorpe Marsh and need to define what is a ‘significant distance’.

Response:

It is not considered appropriate to set out specific stand-off distances within the policy as there may be instances when a proposal is acceptable below a stand-off distance depending on the size of the turbine and it’s proposed location- for example if there was an area of intervening woodland between a property and a moderate scale wind turbine. National Planning Policy Guidance states that Local planning authorities should not rule out otherwise acceptable renewable energy developments through inflexible rules on buffer zones or separation distances. Other than when dealing with set back distances for safety, distance of itself does not necessarily determine whether the impact of a proposal is unacceptable. Distance plays a part, but so does the local context including factors such as topography, the local environment and near-by land uses. No evidence has been provided to demonstrate why this change would be needed and it is considered that the policy 60 criteria are robust enough to manage any negative impacts on local communities. It is clear the local community would prefer to see the area of search boundary further from the edge of the settlement to the west of the Don flood defences and this would need to be considered as part of the community engagement policy 60 requires.
3.1. Policy 60 of the Doncaster Local Plan and the accompanying Background Policy Document on Wind Energy Development seek to establish the parameters for future wind energy development across the Borough. It indicates that Wind Energy Development will be permitted in areas with the highest relative landscape capacity within the Area of Search for Wind Energy Development, as shown on the Policy Map. The area of search was based on a landscape character assessment which predate the operation of a number of windfarm operations including at Tween Bridge, which form an integral component of the landscape. As a result existing wind farm operations have been omitted from the Council’s area of Search for wind energy development. The evidence to support Policy 60 and the background document in particular is out of date. EON therefore consider that the Policy 60 is unsound. Test of Soundness 3.2. EON considers that the Doncaster Local Plan 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 3.3. The Framework is clear that Plans should take a proactive approach to mitigating and adapting to climate change. Paragraph 151, states that to help increase the use and supply of renewable and low carbon energy and heat plans should: - Provide a positive strategy for energy from these sources, that maximizes the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts); - Consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and - Identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co locating potential heat customers and suppliers. 3.4. Critically, footnote 49 states that ‘A proposed wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan; and following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing’. 3.5. National Planning Practice Guidance (NPPG) reiterates the need to increase the amount of energy from renewable and low carbon technologies to make sure the UK has a secure energy supply, reduce greenhouse gas emissions to slow down climate change and stimulate investment in new jobs and businesses. Further, NPPG is clear that planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable. Paragraph 001 5-001-20140306. 3.6. NPPG provides guidance on the identification of suitable areas for renewable energy and states that local planning authorities should take into account the requirements of the technology, and critically the potential impacts on the local environment, including from cumulative impacts. 3.7. NPPG considers that it is important to set out the factors that will be taken into account when considering individual proposals. It states ‘In considering impacts, assessments can use tools to identify where impacts are likely to be acceptable. For example landscape character areas could form the basis for considering which technologies at which scale may be appropriate in different types of location’ Paragraph 005 5-005-20150618. 3.8. In summary, the Framework and NPPG emphasise the need for Local Plans to take a proactive approach to mitigating and adapting to climate change, the need to increase the use and supply of renewable and low carbon energy and heat, and help ensure that the UK has a secure energy supply. Within the current framework new wind energy development (one or more turbines) should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the plan. 3.9. Therefore, it is critical that any area of search that is identified within a Local Plan is based on up to date and robust evidence. Otherwise there is a risk of stifling development which could make a positive contribution to the Frameworks wider objectives. It could also hinder the achievement of the Doncaster Local Plan vision and objectives which comprise to reducing the dependency on fossil fuels the encouragement of a low carbon economy to combat climate change. 3.10. Policy 60 of the Doncaster Local Plan states that wind energy development will be permitted, for medium to large proposals, where they are directed towards areas with the highest relative landscape capacity within the Area of Search for Wind Energy Development, as shown on the Policies Map. The explanatory text in 14.18 notes that landscape character is important and that the Doncaster Landscape Character Assessment highlights potential areas of moderate landscape sensitivity, where wind power schemes may be more suitable. It highlights areas that would be sensitive to such development including the ‘internationally important Thorne and Hatfield Moors’. It goes on to state that the ‘Areas of Search for Wind Energy Development’ focuses on directing medium-scale to large -scale wind turbines to the less sensitive locations within the Don Flood Plain. 3.11. The Background Document - Wind Energy Development Policy Local Plan Evidence Base (July 2019) summarises the evidence base that underpins Policy 60. This comprises the Doncaster Renewable and Low Carbon Energy Study (2012) and the Doncaster Landscape Character Assessment (2006/7). The former clarified the technical potential including maximum theoretical potential for wind power and mapped constraints against this. The Landscape Character Assessment was used to refine the potential search area. The Landscape Character Assessment clearly underpins Policy 60 and the Policies Map. Critically, this evidence was prepared in advance of the operation of Tween Bridge which was approved following an Public Inquiry in 2007. The Landscape Character Assessment and the resultant area of search fails to acknowledge that existing turbines, including the 22 turbines at Tween Bridge, and those at other locations within the Borough that have become operational since 2006/7, form an integral part of the landscape. 3.12. In relation to Tween Bridge, the Landscape Character Assessment considered that wind power would be a new type of development in the character area. It noted that turbines may disrupt a highly valued and high quality relatively undeveloped landscape with relatively few man made influences, built elements or vertical elements. Further, it considered that wind development could be detrimental to the remote setting of Thorne Moors. This is contrary to the Inspectors conclusion following the public inquiry (2007) in which the Inspector concluded that there was no convincing case for refusal on the grounds of landscape and visual impact including cumulative impact.
Thus the evidence is not only out of date but its conclusions in relation to Tween Bridge area are clearly challengeable. 3.13. Additionally, the Landscape Character Assessment sets out parameters where the capacity for wind power was judged to be highest. They included: 1. Locations are away from large settlements where turbines would be too prominent for large numbers of viewers; 2. Where the landscape already has some disturbance from movement; and 3. Where there are already modern man made elements in the landscape. 3.14. The application of the criteria established within the landscape character assessment following the operation of Tween Bridge, would provide support for the inclusion of Tween Bridge and other appropriate existing wind energy operations within the area of search. Further it would seem to challenge the currently defined Area of Search which is adjacent to the main urban area of Doncaster. The evidence that underpins Policy 60, the Area of Search and the Background Document is not consistent with the requirements of national policy. The evidence is not up-to-date and cannot be considered to be adequate for the purpose of defining an Area of Search. 3.15. EON would like to emphasise that at Inquiry the Inspector also concluded that ‘For Tween Bridge I conclude that subject to appropriate conditions any effects on the nightjar or the integrity of the Thorne Moor SPA/SAC would not be so significant to justify withholding consent’. EON have commissioned further work in this respect when considering the potential for additional turbines at Tween Bridge. The Scoping Report for windfarm extension in the context of European nightjar movements, by University of York, concludes that additional Turbines at Tween Bridge are unlikely to impact on the breeding ground of nightjars. The findings of this report are summarised in section 4 and are attached in appendix 1. (SEE EMAIL FOR Appendix) 3.16. EON contend that the addition of a limited number of turbines to the existing operational wind farm at Tween Bridge could be successfully assimilated into the landscape without harm to environmental interests, including population of nightjars, or leading to unacceptable coalescence of areas dominated by wind energy. 3.17. EON consider that Doncaster Local Plan Policy 60 and the accompanying Background Policy Document on wind energy development is not justified since the Local Plan should be an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence (Paragraph 35). Furthermore, the Framework in paragraph 31 is explicit that Plans should be underpinned by relevant and up-to-date evidence that is adequate and proportionate (paragraph 31). The Plan in its present form is informed by outdated landscape information and could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 3.18. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 3.19. However, EON consider that with the inclusion of Tween Bridge within the Area of Search for Wind Energy Developments, the Local Plan can be found sound. EON will continue to work with the Council to develop appropriate modifications to the Local Plan Proposed Change 3.20. To overcome the objection and address soundness matters, the Council should: 1. Update the Landscape Character Assessment Capacity for wind power and the background document that underpins Policy 60. The landscape character assessment and the resultant area of search should reflect that existing windfarm turbines form an integral component of the landscape. The area of search shown on the Policies Map and Policy 60 should be amended to support the consideration of further wind energy development at Tween Bridge. 2. Tween Bridge should be included within the Council’s Area of Search for Wind Energy Development on the Policies Map.

Summary:
Policy 60 - wind Energy Development. 1. Policy is unsound. 2. Evidence in support of Policy is out of date. 3. It does not include ‘Areas of search’ for sites developed post ‘Landscape Character Assessment (LCA) (2007/7) 4. Critical that ‘Areas of search’ identified are based on up to date and robust evidence. 5. The landscape Character assessment (2006/7) that underpins the Policy is out of date. 6. The Tween Bridge site should be included as an area Of Search. 7. The evidence for Tween Bridge (LCA) is clearly challengeable as it was granted planning permission following a public enquiry (2007). 8. Future development could be assimilated successfully at Tween Bridge. Proposed changes: 1. Update Landscape Character Assessment. 2. Include Tween Bridge as an area of search on the Policies Map. Also included with the representation: 1. ‘Scoping report for the windfarm extension in the context of European Nightjar movement’ (University of York) 2. In a nutshell - little evidence of conflict between Nightjars and windfarm.

Response:
The comments are noted. The Area of Search is based, in part, on the council’s landscape evidence base and is considered to be justified and consistent with national policy. It is noted that the policy does not exclude such proposals from coming forward in other appropriate locations and subject to all other relevant policies in the plan.
EON commissioned a 'Scoping Report for Windfarm Extension in the Context of European nightjar (Caprimulgus europaeus) Movements' to inform the potential for further turbines at Tween Bridge. The report follows on from three years of GPS and radio-tracking on Thorne Moors, this has shown relatively little interaction of the foraging birds with the turbines. The tracking data from the last three breeding seasons shows the area where the new turbines are proposed is used infrequently. Overall nightjars do not make regular use of the arable area around Thorne Moor, particularly further than 400m from the edge of the moor. The report notes movement between Thorne and Crowle Moors, to the south east. Significantly, the analysis of data suggests that there has not been a decline in species since the construction and operation of the existing wind turbines, and notes a steady increasing trend over the last 13 years. The report concludes that the use of the proposed new turbine area by nightjars is low overall and the construction of turbines is unlikely to cause any problems to the breeding population of nightjars on Thorne Moor. The report does note that there is more regular use of the area between Thorne and Crowle Moors on the south eastern site, and recommends further work should for this area specifically. It should be noted that no such recommendations are made in respect of the land and turbines proposed to the west of the Moor the area considered within these representations. The full report is appended to these representation in Appendix 1. (SEE EMAIL FOR Appendix)

Summary:
EON commissioned a 'Scoping Report for Windfarm Extension in the Context of European nightjar (Caprimulgus europaeus) Movements' to inform the potential for further turbines at Tween Bridge. The report concludes that the use of the proposed new turbine area by nightjars is low overall and the construction of turbines is unlikely to cause any problems to the breeding population of nightjars on Thorne Moor. The full report is appended to the representation.

Response:
Scoping Report noted - see response to detailed reps set out elsewhere in this document.
We reiterate comments made previously, that although we are pleased to see the commitment not to support proposals which would have adverse effects on/lead to deterioration of water resources, the policy again does not seem ambitious enough. As previously stated, we would recommend also including a statement to the effect of "proposals would be supported which would make positive progress towards achieving "good" status or potential under the Water Framework Directive in the borough's surface and ground waterbodies".

**Summary:**
Policy 61 - Protecting & Enhancing Doncaster's Soil & Water Resources - reiterate previous comments that the policy is not ambitious enough and recommend wording in respect to supporting proposals that make positive progress towards achieving 'good' status or potential under Water Framework Directive

**Response:**
Noted and agree, proposed to make amendment to policy text part E as follows (Main Modification) with existing Part E becoming Part 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/or, 2. promote water efficiency measures which take account of current water availability (e.g. informed by Catchment Abstraction Management Strategies) and future demand.
Comment:

Although the Sustainability Appraisal previously indicated that issues around water availability and water efficiency had been considered in the development of the Local Plan, there are no explicit references to any of the following in the publication version of the Plan itself - "water availability", "water efficiency", "drought", "CAMS (Catchment Abstraction Management Strategies)". This is concerning and suggests that matters relating to water resources have not been fully addressed. We would certainly expect to see wording in at least one of the policies giving support to development proposals that promote water efficiency measures, and which take account of current water availability (e.g. using CAMS as an initial information resource) and future demand.

Summary:

General Water Resource Comments - although the SA previously indicated that issues around water availability and efficiency had been considered in the development of the plan, there are no explicit references in the plan itself in respect to water availability, water efficiency, drought or Catchment Abstraction Management Strategies which is concerning and suggests that water resource matters have not been fully addressed.

Response:

Noted - it is proposed to add an additional criteria to Policy 61 as set out above to comment reference 10 to address these concerns:
The majority of the Doncaster area is served by Yorkshire Water and Severn Trent Water. Anglian Water is the sewerage undertaker for part of Doncaster Borough only (parishes of Auckley, Austerfield, Blaxton and Finningley) within and close to Doncaster Sheffield Airport. We are also the water undertaker for part of Finningley Parish. The following comments are submitted on behalf of Anglian Water and relate to our company area only. Anglian Water had previously asked for reference to be added to the submission requirements for surface water and groundwater sources in Policy 61. We note that the supporting text has been included to refer to groundwater sources and how development proposals will only be acceptable where pollution risks can be mitigated as well as the requirements of the Water Framework Directive.

### Summary:
Anglian Water had previously asked for reference to be added to the submission requirements for surface water and groundwater sources in Policy 61. It is noted that the supporting text has been included to refer to groundwater sources and how development proposals will only be acceptable where pollution risks can be mitigated as well as the requirements of the Water Framework Directive.

### Response:
Comment noted. Surface water is also covered in policy 57 'Development sites must incorporate satisfactory measures for dealing with their drainage impacts to ensure waste water and surface water run-off are managed appropriately'. Section F of policy 57 identifies the appropriate networks for dealing with surface water runoff. Groundwater is also referenced in paragraph 14.28 of policy 61 explanatory text... 'The quality of groundwater is at risk from nitrate pollution, particularly within the vicinity of Thorne and Hatfield Moors. Doncaster has a number of source protection zones, including at Hatfield, Dunsforth, Edenthorpe, Cantley, Rossington, Bessacarr and Austerfield, where development might cause pollution or undermine ground water sources, such as wells and springs. In these areas, proposals will only be allowed where they can demonstrate that any pollution risks can be mitigated during its construction and operation.'
Comment: Unsound because: Not positively prepared in relation to identified need to store water (text at 14.32) but without related and specific proposals or policies - Not effective in fully integrating extensive forms of land-based energy generation schemes within the policy - Supporting text ('Explanation') at 14.25 does not cover likely energy generation-related proposals (e.g. ground-mounted solar schemes: 'solar farms') and we suggest that explicit reference to such forms of development will add useful clarity. Text at 14.32 identifies 'a need to store water within the landscape' for the purposes of irrigation and protection of wetland habitats but does not offer policies (e.g. as to appropriate scale of storage) or spatial plans to plan for these positively. PROPOSED CHANGE Amend text (third sentence) at 14.25 as follows: Proposals for other uses of agricultural land for purposes such as flood storage, biomass planting schemes (e.g. reed bed creation) and energy generation (e.g. solar power) will be supported where they avoid the loss of high quality agricultural land.

Summary:
Unsound as: Not positively prepared in relation to identified need to store water, but without specific related proposals / policies - Ineffective in fully integrating extensive forms of land-based energy generation schemes within the policy - Supporting text at 14.25 does not cover likely energy generation related proposals and reference should be specifically made. Text at 14.32 does not offer policies or spatial plans to plan positively for these. Proposed change: Amend text (third sentence) at 14.25 as follows: Proposals for other uses of agricultural land for purposes such as flood storage, biomass planting schemes (e.g. reed bed creation) and energy generation (e.g. solar power) will be supported where they avoid the loss of high quality agricultural land.

Response:
Comment Noted Paragraph 14.28 of the Local Plan acknowledges, Doncaster overlies two principal aquifers (Doncaster water storage areas): Sherwood Sandstone (from which drinking water is obtained) and the Magnesian Limestone (from which drinking water can be obtained). Sherwood Sandstone is the second most important source of ground water in the UK. However, ground water supplies within both aquifers are relatively low due to over abstraction. We acknowledge the aquifers replenish over time through percolating rainwater and the EA will generally refuse new abstraction licenses in these areas. NPPF does not make explicit reference to solar energy and uses the term 'renewables'. NPPG covers solar farms. these are classed as temporary development and conditions are required to ensure the land is restored to its previous use. NPPG paragraph 013 identifies the planning considerations that relate to large scale ground-mounted solar photovoltaic farms and NPPG is not required to be repeated in the Local Plan.
With respect to the issue of dealing with waste water from new developments, and the potential for an impact on the Humber Estuary, we note that you are still waiting for further information from Yorkshire Water and Anglian Water. The information that is ultimately provided will need to be incorporated into a future draft of the Habitat Regulations Report and any further assessment and/or necessary recommendations made at that point. This was raised in our response dated 30 January 2019 reference: 67266. It appears there are safeguards in the plan to outline that infrastructure needs to be in place to meet demand (Policy 57 requires developments to ensure they have an adequate means of foul sewage disposal). However if developers are unable to demonstrate this the application(s) will fail so there is no threat to the designated site. What this means for deliverability is for the LPA to outline and demonstrate. The safeguards provided in the plan ensure that waste water infrastructure should be in place to meet the demands of new development. This protects designated sites in terms of avoiding overcapacity and negative effects as a result. How this affects deliverability of housing sites is not something Natural England would comment on. Natural England endorses policy requirements in the NPPF in terms of ensuring sufficient infrastructure provision (para 20, NPPF), including infrastructure for waste water, to ensure policies in plans are deliverable and planning applications can progress.

Response:
The Council has attempted to engage with Yorkshire Water throughout the local plan process to date. For example, proposed site allocations have been sent in GIS format to assist with their own service planning and in order to allow them to assess the sites in terms of capacity of their utility network, in particular waste water treatment. Due to resource issues at Yorkshire Water, the organisation has made it clear that they are no longer resourced to be able to respond to development plans. The remainder of the Borough is served by Seven Trent Water (with Anglian Water serving a small inset around the Airport). Both of these utility providers have engaged with the local plan, for example see Representations made by both to the Regulation 19 plan. It should be noted that a number of upgrades to Yorkshire Water’s waste water treatment network were made in recent years and as the Representation notes, Policy 57 requires development to ensure adequate means of foul sewage disposal. Possible risks to delivery are noted, but as set out in response to Policy 3 and 6, there is a significant allocation above the requirement which provides flexibility should occasional sites not come forward as envisaged.
We are supportive of Policy 61: in particular Bullet point E: “Proposals will not be supported which would: 1. have an adverse impact on the ecological status or recreational value of rivers and other water bodies such as flood storage areas; 2. lead to the deterioration in the quality of surface and ground waters; and 3. lead to a reduction in groundwater levels (or reduced flows in watercourses).” The protection of water resources will be vital to providing potable water for future growth and development.

Support noted.
2.56 Part a) of the policy states that: "proposals on non-allocated sites that involve the loss of the best and most versatile agricultural land (grades 1, 2 and 3a) will only be supported where: - there is an overriding need for the proposal; - there are no other suitable alternative locations on lower quality agricultural land (or non-agricultural land) available; or - the land can be reinstated back to its previous state (where possible)." 2.57 Our Client objects to this policy as currently drafted as it does not align with national planning policy and is therefore unsound. The Revised NPPF at footnote 53 is clear that it is only where significant areas of best and most versatile agricultural land will be lost, that areas of poorer quality should be sought as an alternative. It is our understanding that planning appeals have found that significant development in this context is circa 20 hectares.

Summary:
Policy 61 - Protecting and Enhancing Doncaster's Soil and Water Resources 1. Re Part (a) of the Policy. 2. Does not conform to NPPF footnote 53. 3. Should be only where significant areas of best and most versatile agricultural land will be lost as per footnote 53 NPPF.

Response:
Comment noted. The word 'significant' does feature in policy 61 and is therefore NPPF compliant. The policy says? Proposals on non-allocated sites that involve the significant loss of the best and most versatile agricultural land (grades 1, 2 and 3a) will only be supported where: 1. there is an overriding need for the proposal; 2. there are no other suitable alternative locations on lower quality agricultural land (or non-agricultural land) available; or 3. the land can be reinstated back to its previous state (where possible).
Comment Ref: C/Policy 61/04956/1/017
Attend Examination: Attend Hearing
Reason:
Area: Chapter 14: Climate Change, Mineral Resources & Energy
Policy: Policy 61: Protecting & Enhancing Doncaster’s Soil & Water Resources
Tests of Soundness:

Consistent with national

Comment:

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Response:

Comment noted. The word 'significant' does feature in policy 61 and is therefore NPPF compliant. The policy says? Proposals on non-allocated sites that involve the significant loss of the best and most versatile agricultural land (grades 1, 2 and 3a) will only be supported where: 1. there is an overriding need for the proposal; 2. there are no other suitable alternative locations on lower quality agricultural land (or non-agricultural land) available; or 3. the land can be reinstated back to its previous state (where possible).
East Riding does not raise any objection to the wording of policies within the Publication Draft Doncaster Local Plan under the tests of soundness, but would like to raise the following comment relating to the locally sourced supply of sand and gravel in the supporting text to Policy 62: Providing for and Safeguarding Mineral Resources (Strategic Policy). It is noted that part A3 of Policy 62 on providing for minerals, requires landbanks of 7 and 10 years for sand and gravel and limestone respectively. Part A4 of this policy links the monitoring to an annual aggregate assessment. It is assumed that this monitoring would be through the Local Aggregate Assessment (LAA) as table 10 in the supporting text then references figures from the 2018 LAA including landbank figures. The Council agrees this wording of the policy is appropriate, however in order for the policy to be as effective as possible and positively act to meet aggregate needs, landbanks need to be appropriately monitored through the LAA. In our previous responses to the last two Doncaster LAAs, East Riding raised our concern about the method of landbank monitoring being used stating that: "There remains concern the Doncaster/Rotherham landbank figure is inflated by lower 10 year average sales figures over time. This is clearly shown in table 2 where in 2008 there was a land bank of 12.4 years with a reserve of 10.0Mt, but in 2017 there is a much higher land bank of 18.1 years but a lower reserve of 5.6Mt. This results in there being little imperative to allocate, encourage or permit additional supplies of sand and gravel to come forward within Doncaster/Rotherham by virtue of the area far exceeding a 7 year land bank. This approach to calculating the land bank may therefore perpetuate a less sustainable pattern of supply of importing sand and gravel aggregate from elsewhere, including from the East Riding, into Doncaster/Rotherham. A way of counteracting this would be to uplift the 10 year sand and gravel sales average and calculate the land bank based on this, rather than on purely the 10 year average. The West Yorkshire, North Yorkshire, and Humber LAAs all do this to some degree already and may provide examples of ways in which a similar approach could be taken forward in the Doncaster/Rotherham." Under National Planning Policy (NPPF) (para 207e), landbanks are principally used as an indicator of the security of aggregate minerals supply, and to indicate the additional provision that needs to be made for new aggregate extraction and alternative supplies in mineral plans. National Planning Practice Guidance (NPPG) Paragraph: 082 Reference ID: 27-082-20140306 states landbanks are an essential component of planning decision-making in establishing the basis of the level of provision of new aggregate allocations, revising the provision of aggregates in the area, and an indicator that applications should be permitted as a matter of importance should the landbank be low. Our understanding (as highlighted above) is that Doncaster bases its aggregate landbank calculation on a decreasing average of 10 years of sales figures, without the inclusion of any uplift for demand or other considerations of the overall reduction in the known amount of sand and gravel supply 'banked' in Doncaster. Our remaining concern is that this method will continue to artificially inflate the years of available land banks in Doncaster. This would not allow a low supply to be evidenced and then used as a trigger to consider the identification of other minerals supply in the way envisaged by the NPPF and NPPG. Specifically using the current calculation in your LAA, the aim of Para 207e of the NPPF would not be able to come into effect. Additionally, NPPG Paragraph: 080 Reference ID: 27-080-20140306, also envisages landbanks principally as a monitoring tool to provide a mineral planning authority with early warning of possible disruption to the provision of an adequate and steady supply of land-won aggregates in their particular area and as a trigger for review of aggregate provision. East Riding is concerned that these provisions in the NPPF and NPPG will be unable to come into effect as envisaged, therefore creating a risk that the insecurity of sand and gravel supply to the District is not highlighted and that additional provision or alternative supplies are not fully planned for. This then creates a knock-on risk for shortfalls in supply in Doncaster to create increases in supplying areas, such as the East Riding. This has the potential to require additional aggregates to be sourced within East Riding that are currently not planned for in our recently examined Joint Minerals Local Plan. This raises the additional issues over associated impacts on sustainability of increasing haulage miles and decreasing self-sufficiency in aggregate provision. In order to address this issue, East Riding advises that the Doncaster Council should factor in 'other relevant local information' into its demand forecast in the LAA that is used to calculate the landbank in line with Para 207a of the NPPF. It should also be noted that NPPG Paragraph: 064 (Reference ID: 27-064-20140306) also clearly states that LAAs must also consider other relevant local information in addition to the 10 year rolling average supply. This adjusted 'demand forecast' could then be used as the basis of a revised local provision figure in table 10 of Publication Draft Doncaster Plan. To reiterate, East Riding's does not make an objection to the Doncaster Local Plan under the tests of soundness and the Council agrees that sand and gravel reserves are declining in Doncaster and that it is not possible to allocate sites elsewhere, including from the East Riding, into Doncaster/Rotherham. However East Riding would like to advise that when this is the case, acknowledging this through a comprehensively calculated landbank would then allow the relevant national policy mechanisms to kick in. Options to increase provision of sand and gravel in the district, such as making further Local Plan allocations or seeking increased imports from neighbouring producing areas could then be explored to provide a solution. This would allow the overall cross boundary approach to minerals planning to work more transparently in line with the Managed Aggregate Supply System and allowing wider sub-regional aggregate supply chains to meet the appropriate demands of the development industry.
East Riding does not raise any objection to the wording of policies within the Publication Draft Doncaster Local Plan under the tests of soundness. The policy wording is appropriate, however in order for the policy to be as effective as possible and positively act to meet aggregate needs, land banks need to be appropriately monitored through the LAA. Doncaster council should factor in 'other information' into the demand forecast in the LAA, and uplift the 10 year sand and gravel sales average and calculate the land bank based on this, rather than on purely the 10 year average. The adjusted demand forecast could be used as a basis for a revised local provision figure. East Riding quote NPPF 207e and NPPG paragraphs 082 which say land banks are principally used as an indicator of the security of aggregate minerals supply and essential component of planning decision-making in establishing the basis of the level of provision of new aggregate allocations, East Riding’s does not make an objection to the Doncaster Local Plan under the tests of soundness and the Council agrees that sand and gravel reserves are declining in Doncaster and that it is not possible to allocate sites where there is little evidence of available resources. Acknowledging resource decline through a comprehensively calculated land bank would allow the relevant national policy mechanisms to kick in and increase provision of sand and gravel by allocating sites in the Local Plan or seeking imports from neighbouring authorities. The shortfall in Doncaster has potential to require additional aggregates to be sourced within East Riding that are currently not planned for in our recently examined Joint Minerals Local Plan.

Response:
The Local Plan and 2018 Local Aggregates Assessment (LAA) identifies a 5.6Mt reserve and land bank of 18.1 years for sand and gravel based on ten year average sales (which does include periods of low sales). The plan also acknowledges a short fall in sharp sand and gravel evidenced from previous annual surveys (see paragraph 14.47). Doncaster Council has identified other information in the Local Plan to identify ‘Local Provision’. The Local Plan evidence base includes information identifying the depletion of sharp sand and gravel resources. These documents include: o BGS - Mineral Resource Information in Support of National, Regional and Local Planning (South Yorkshire) (C/04/173N) (pre NPPF), and; o BGS - Yorkshire & Humber Region Sand and Gravel Resources and Environmental Assets - Phase One (CR/04/216N), Which states 'older river gravels that were the focus of extraction have now been depleted' o 2009 and 2014 (national) Aggregate Mineral Surveys; which identifies reserves and output o Yorkshire & Humber AWP Annual Aggregates Monitoring Reports; which clarifies the depletion of sharp sand and gravel resources. o Forecasting the Demand for Aggregates (evidence base paper); which identifies the 'Local Need' for South Yorkshire based on previous extraction and known housing delivery. Doncaster disagrees that the land bank has provided little imperative to encourage or permit additional supplies of sharp sand and gravel. The amount of available sharp sand and gravel and not the 'landbank' has been the principle driver for allocating sites since the adoption of the 2012 Core Strategy. This principle is retained in the Local Plan. See policy 65 A.5. Which states applications need to demonstrate at least 20% sharp sand and gravel. The 2019 LAA (ratified by the Y&H AWP in October 2019) shows land banks based on 10 year and 3 year averages. This 3 year average NPPG para 064) is used to identify short term trends and identifies that if extraction continues at the current rate the sand and gravel reserve will last only 9.8 years. In terms of ten year average sales or three year average sales for use in considering whether it might be appropriate to increase supply, this is only possible if resources are available. The Local Plan allocates all appropriate sand and gravel representations received. And goes further to allocate extensive areas of search to allow for the minerals industry to explore for any remaining resources in the area. Given that each LAA has been ratified by the Y&HAWP it should be acknowledged that the evidence base supporting the Local Plan is sound. Proposed amendment to the Local Plan include: Clarifying the level of provision, by amending the table 10 to show average sales for ten and three years, additional provision (local plan proposals) and additional years on the land bank. This will also lead to minor amendments to the explanatory text to clarify what Doncaster can supply during the plan period.
Doncaster has, for many years, been a source of building stone for buildings and structures both within the Borough but also the surrounding areas. Whilst the majority of these were within the Southern Magnesian Limestone Ridge, there are known to be other building stones and areas where stone has, in the past, been quarried within the Doncaster area. There is, for example, a historic building stone quarry within the Rotliegendes Group and several areas of sandstone were worked within both the Pennine Middle Coal Measures and the Pennine Upper Coal Measures. We welcome the recognition of this important mineral resource. However, the Policy makes no reference to how the plan will address this resource. PROPOSED CHANGE Policy 62, Criterion A add the following additional Criterion: “Enabling the reopening of historic sources of building stone where they are required to facilitate the conservation of a heritage asset”
Unsound because: - Is not consistent with national targets (carbon budgets) to radically reduce carbon emissions by 2035. Policy 62 (policy and supporting text/explanation) is not properly cognisant of the Government’s recently adopted/revised policy to meet a carbon net zero target by 2050 by overstating the need for oil and gas, which will not be consistent with future carbon budgets. The rationale for italicisation of part of explanatory text at 14.41 is unclear. We also suggest a change below to better reflect the reducing need for fossil fuels (imported or indigenous).

PROPOSED CHANGE
Amend text of 14.33, as follows: Minerals, such as sand and gravel, limestone and clay are essential to meeting society’s needs for economic growth and development. Others, such as gas and oil, are important in helping meet our needs for energy, although, as fossil fuels, they will need to be phased out to facilitate a rapid transition to a low carbon economy. Policy 62 to be amended as follows:

2. providing for sufficient industrial and energy minerals that balance both the economic and environmental benefits, taking into account the need to move to a low carbon economy;
Criterion B) 5. of Policy 62 needs re-writing/clarifying so that it is plainer that ‘permitted’ refers to permitted development (i.e. under GDO) unless it has some other meaning? Change last sentence of 14.41 to: Our approach to supporting the need for industrial and energy minerals will have regard to both the local economy and environment, including the need to phase out hydrocarbon use in line with national carbon budgets.

Response:
Comments noted. The minerals policies and supporting text conforms to the NPPF, NPPG, which identifies the short term need for hydrocarbons to contribute towards a long term low carbon economy. No changes proposed to paragraph 14.33. No change proposed to Policy 62 (including B5), which is clarified in supporting text 14.55 No change proposed to 14.41 your proposal is not compliant with NPPF.
**Comment Ref:** C/Policy 62/01223/12/002

**Name:** The Coal Authority

**Date:** 23/09/2019

**Organisation:** The Coal Authority

**Representing:** The Coal Authority

**Comment Ref:** C/Policy 62/01223/12/002

**Attend Examination:** Written Representation

**Reason:**

**Area:** Chapter 14: Climate Change, Mineral Resources & Energy

**Policy:** Policy 62: Providing for & Safeguarding Mineral Resources

**Tests of Soundness:**

**Comment:**

The Coal Authority supports the inclusion of Policy 62: Providing for and Safeguarding Minerals against which proposals for mineral extraction will be assessed.

**Summary:**

supports the inclusion of Policy 62: Providing for and Safeguarding Minerals

**Response:**

Comment noted
The policy needs to be consistent with the NPPF which requires Mineral Planning Authorities to ‘plan for a steady and adequate supply of minerals’. We suggest the policy is re-worded to ensure consistency with the NPPF. Proposed Changes (deletions in strikethrough; new text in bold) (THIS CANNOT BE SHOWN - DELETIONS REMOVED, NEW TEXT SHOWN AS CAPITAL) The extraction and production of aggregate, industrial, building stone and energy minerals that contribute to infrastructure and construction projects will be supported through the following principles:

A) The Council will aim to PLAN FOR A STEADY AND ADEQUATE SUPPLY OF minerals during the plan period by: 1. encouraging the use of suitable secondary and recycled material in the first instance, minimising the need for primary extraction; 2. PLAN FOR A STEADY AND ADEQUATE SUPPLY of industrial, and energy minerals that balance both the economic and environmental benefits: 3. contributing toward local provision by maintaining, a landbank of permitted reserves for at least seven years for sand and gravel and with Rotherham Council at least ten years for aggregate limestone; 4. monitoring and reviewing the permitted reserves of sand and gravel, and aggregate limestone and producing an annual aggregate assessment AND REVIEWING THE PLAN AT LEAST EVERY 5 YEARS. 5. requiring proposals for sand and gravel to demonstrate that the mineral resource includes at least 20% sharp sand and gravel; 6. identifying on the Proposals Map existing mineral sites, new mineral proposals (preferred areas), and ‘Areas of Search’; (see Table below) 7. identifying on the Proposals Map minerals supporting infrastructure to be safeguarded during and beyond the plan period (see Table below); and B) Proposals for non-mineral development within Mineral Safeguarding Areas AND PERMITTED MINERAL OPERATIONS, and the 250m buffer zone, OF THEIR BOUNDARY, WILL HAVE THE AGENT OF CHANGE PRINCIPLE APPLIED AND FURTHERMORE will be supported where it can be demonstrated that: 1. consideration has been given to the long-term economic value of the mineral AND A FULL GEOLOGICAL REPORT IDENTIFYING THE EXTENT AND QUALITY OF THE MINERAL FORMS PART OF ANY APPLICATION FOR NON-MINERAL DEVELOPMENT; 2. non-mineral development can take place without preventing the mineral resource from being extracted in the future TAKING INTO ACCOUNT THE AGENT OF CHANGE PRINCIPLE; 3. the proposal can feasibly incorporate the prior extraction of any minerals of economic value in an environmentally acceptable way; 4. the need for the development outweighs the need to safeguard the site for future; 5. the development is temporary in nature, OR IS CONSIDER AS EXEMPT DEVELOPMENT ON THE SAFEGUARDING CRITERIA LIST. The suggested Safeguarding Exemption Criteria list is as follows; - Infilling in an otherwise built up frontage within a settlement - Householder applications within the curtilage of a property - Advertisement applications - Reserved matters applications - Applications for new or improved accesses - Minor’ extensions/alterations to existing uses/buildings which do not fundamentally change the scale and character of the use/building ’Temporary’ development (for up to five years) - Agricultural buildings adjacent to existing farmsteads - ‘Minor’ works such as fences, bus shelters, gates, walls, accesses. - Amendments to current permissions (with no additional land take involved) - Changes of use - Applications for development on land which is already allocated in an adopted local plan where the plan took account of minerals and waste safeguarding requirements - Listed Building Consent and applications for planning permission for demolition in a conservation area - Applications for work on trees or removal of hedgerows - Prior notifications for telecommunications, forestry, agriculture and demolition - Redevelopment of previously developed land not increasing the footprint of the former development - Certificates of Lawfulness of Existing Use of Development and - Certificates of Lawfulness of Proposed Use or Development

Legally compliant - no comment Sound - no (not positively prepared) Policy 62. To be compliant with the NPPF policy wording changes are required? (deletions within asterisk *xxx*; new text in capitals)

A) The Council will aim to PLAN FOR A STEADY AND ADEQUATE SUPPLY OF *efficiently and sustainably sourced* minerals 1. no change 2. providing PLAN FOR A STEADY AND ADEQUATE SUPPLY OF *for sufficient* industrial, and energy minerals 3. contributing toward local provision by maintaining, where possible, a land bank of permitted reserves 4. monitoring and reviewing the permitted reserves of sand and gravel, and aggregate limestone and producing an annual aggregate assessment AND REVIEWING THE PLAN AT LEAST EVERY 5 YEARS. 5. no change 6. no change 7. no change

B) Proposals for non-mineral development within Mineral Safeguarding Areas AND PERMITTED MINERAL OPERATIONS, and the 250m buffer zone, OF THEIR BOUNDARY, WILL HAVE THE AGENT OF CHANGE PRINCIPLE APPLIED AND FURTHERMORE will be supported where it can be demonstrated that: 1. consideration has been given to the long-term economic value of the mineral AND A DULL GEOLOGICAL REPORT IDENTIFYING THE EXTENT AND QUALITY OF THE MINERAL FORMS PART OF ANY APPLICATION FOR NON-MINERAL DEVELOPMENT; 2. non-mineral development can take place without preventing the mineral resource from being extracted in the future taking into account the agent of change principle; 3. no change 4. no change 5. the development is *permitted, minor* or temporary in nature, OR IS CONSIDER AS EXEMPT DEVELOPMENT ON THE SAFEGUARDING CRITERIA LIST.
Response:

Part A) comment noted. No change proposed. Section 17 of the NPPF is entitled ‘facilitating the sustainable use of minerals’, which acknowledges the need for secure long term conservation as such there should be both a steady and adequate supply of minerals which should be efficiently and sustainably sourced. A.2) comment noted. No change proposed. covered in point A A.3) comment noted. No change proposed. flexibility may be needed in terms of the land bank due to sand and gravel resource depletion A.4) comment noted. No change proposed. no requirement to duplicate national policy  B.1) comment noted. No change proposed. see Local Plan paragraph 14.23, which identifies requirement for a geological report B.2) comment noted. No change proposed. Agent of change principle, and requirement for mineral survey information are in paragraph 14.55 B.5) comment noted. No change proposed. See Local Plan paragraph 14.55, which clarifies the policy requirement

CUSREF: 04288 Name: Turley
Date: 30/09/2019 Organisation: Turley
Representing: Peel Land and Property Management Limited

Comment Ref: C/Policy 62/04288/1/013
Attend Examination: Attend Hearing
Reason: In order to explain further the rationale behind the suggested changes and be given the opportunity to respond to any changes the Council propose to make and any further evidence that is presented.
Area: Chapter 14: Climate Change, Mineral Resources & Energy

Tests of Soundness:

Justified Consistent with national

Comment:

8.1 Peel has a number of comments on the LP’s other strategic and non-strategic policies as currently drafted. These are summarised below: 8.11 The draft policy and policies map appears to identify specific areas of the Borough which are existing and proposed mineral workings; ‘Areas of Search’ and areas which are safeguarded. It is not clear if the policy is the definitive position of mineral workings or safeguarding across the borough as it would appear, on this basis, that the Mineral Safeguarding Area which previously existed to the west of the airport has been removed. 8.12 For completeness, Peel request clear and categoric confirmation within the LP that any Mineral Safeguarding Area which has previously been identified within the Airport Masterplan’s demise is indeed removed, as appears to be the case; the plan and policies map should make this clear. The Airport and its masterplan area is the borough’s biggest economic asset and will deliver most economic potential and growth across the borough and SCR. It should not be unnecessarily constrained in its delivery.

Summary:
The policy and proposals may appears to identify specific areas of the borough which are existing minerals areas of search and areas which are safeguarded. It is not clear if the policy is the definitive position on mineral workings or safeguarding across the borough as it would appear the safeguarding area to the west of the airport has been removed. For completeness, clear and categoric confirmation within the LP that any mineral safeguarding area which was previously identified with the airport masterplan are is indeed removed and the plan / map should make this clear. The masterplan area and airport is the borough’s biggest economic asset and should not be unnecessarily constrained in its delivery.

Response:

Comment Noted. Policy 62 and the policies map identifies mineral sites, preferred areas, areas of search and safeguarding areas across the borough. The mineral safeguarding area for sand and gravel to the east of the borough has been retained and expanded, not removed. Paragraph 14.55 states that mineral safeguarding areas are identified under developed / sterilised areas to allow for prior extraction consideration should this be appropriate as part of a redevelopment / regeneration scheme.
The policy needs rewording to be consistent with the NPPF and therefore make it sound. Proposed Changes (deletions in strikethrough; new text in bold) - These cannot be shown therefore deletions shown in brackets with X either sides (x deleted text x) and new text in CAPITAL) The extraction and production of aggregate, industrial, building stone and energy minerals that contribute to infrastructure and construction projects will be supported through the following principles A) The Council will (X aim to X) plan for a steady AND adequate SUPPLY OF (X efficiently and sustainably sourced X) minerals during the plan period by: 1. encouraging the use of suitable secondary and recycled material in the first instance, minimising the need for primary extraction; 2. (X providing X) PLAN FOR A STEADY AND ADEQUATE SUPPLY OF (X for sufficient X) industrial, and energy minerals that balance both the economic and environmental benefits: 3. contributing toward local provision by maintaining, (X where possible X), a landbank of permitted reserves for at least seven years for sand and gravel and with Rotherham Council at least ten years for aggregate limestone; 4. monitoring and reviewing the permitted reserves of sand and gravel, and aggregate limestone and producing an annual aggregate assessment AND REVIEWING THE PLAN AS REQUIRED BUT IN ANY EVENT AT LEAST EVERY 5 YEARS. 5. requiring proposals for sand and gravel to demonstrate that the mineral resource includes at least 20% sharp sand and gravel; 6. identifying on the Proposals Map existing mineral sites, new mineral proposals (preferred areas), and ‘Areas of Search’; (see Table below) 7. identifying on the Proposals Map minerals supporting infrastructure to be safeguarded during and beyond the plan period (see Table below); and, B) Proposals for non-mineral development within Mineral Safeguarding Areas AND PERMITTED MINERAL OPERATIONS, and the 250m buffer zone, OF THEIR BOUNDARY, WILL HAVE THE AGENT OF CHANGE PRINCIPLE APPLIED AND FURTHERMORE will be supported where it can be demonstrated that: 1. consideration has been given to the long-term economic value of the mineral AND A FULL GEOLOGICAL REPORT IDENTIFYING THE EXTENT AND QUALITY OF THE MINERAL FORMS PART OF ANY APPLICATION FOR NON-MINERAL DEVELOPMENT; 2. non-mineral development can take place without preventing the mineral resource from being extracted in the future TAKING INTO ACCOUNT THE AGENT OF CHANGE PRINCIPLE; 3. the proposal can feasibly incorporate the prior extraction of any minerals of economic value in an environmentally acceptable way; 4. the need for the development outweighs the need to safeguard the site for future; 5. the development is (X permitted, minor or X) temporary in nature, OR IS CONSIDER AS EXEMPT DEVELOPMENT ON THE SAFEGUARDING CRITERIA LIST. The suggested Safeguarding Exemption Criteria list is as follows; - Infilling in an otherwise built up frontage within a settlement - Householder applications within the curtilage of a property - Advertisement applications - Reserved matters applications - Applications for new or improved accesses - Minor’ extensions/alterations to existing uses/buildings which do not fundamentally change the scale and character of the use/building ‘Temporary’ development (for up to five years) - Agricultural buildings adjacent to existing farmsteads - ‘Minor’ works such as fences, bus shelters, gates, walls, accesses. - Amendments to current permissions (with no additional land take involved) - Changes of use - Applications for development on land which is already allocated in an adopted local plan where the plan took account of minerals and waste safeguarding requirements - Listed Building Consent and applications for planning permission for demolition in a conservation area - Applications for work on trees or removal of hedgerows - Prior notifications for telecommunications, forestry, agriculture and demolition - Redevelopment of previously developed land not increasing the footprint of the former development - Certificates of Lawfulness of Existing Use of Development and - Certificates of Lawfulness of Proposed Use or Development

Summary:
Proposed Changes (deletions in strikethrough; new text in bold) - These cannot be shown therefore deletions shown in brackets with X either sides (x deleted text x) and new text in CAPITAL) Policy 62 A) The Council will aim to plan for a steady AND adequate SUPPLY OF (X efficiently and sustainably sourced X) minerals during the plan period by: 2. (x providing x) PLAN FOR A STEADY AND ADEQUATE SUPPLY OF for sufficient industrial, and energy minerals that balance both the economic and environmental benefits: 3. contributing toward local provision by maintaining, where possible, a land bank of permitted reserves for at least seven years for sand and gravel and with Rotherham Council at least ten years for aggregate limestone; 4. monitoring and reviewing the permitted reserves of sand and gravel, and aggregate limestone and producing an annual aggregate assessment AND REVIEWING THE PLAN AS REQUIRED BUT IN ANY EVENT AT LEAST EVERY 5 YEARS. B) Proposals for non-mineral development within Mineral Safeguarding Areas AND PERMITTED MINERAL OPERATIONS, and the 250m buffer zone, OF THEIR BOUNDARY, WILL HAVE THE AGENT OF CHANGE PRINCIPLE APPLIED AND FURTHERMORE will be supported where it can be demonstrated that: 1. consideration has been given to the long-term economic value of the mineral AND A FULL GEOLOGICAL REPORT IDENTIFYING THE EXTENT AND QUALITY OF THE MINERAL FORMS PART OF ANY APPLICATION FOR NON-MINERAL DEVELOPMENT; 2. non-mineral development can take place without preventing the mineral resource from being extracted in the future TAKING INTO ACCOUNT THE AGENT OF CHANGE PRINCIPLE; 5. the development is (x permitted, minor or x) temporary in nature, OR IS CONSIDER AS EXEMPT DEVELOPMENT ON THE SAFEGUARDING CRITERIA LIST.

Response:
Comment noted. The policy is worded in a way that provides flexibility, addresses sustainability, and meets with the NPPF requirements of being positively prepared. Not required to repeat NPPF with regard to plan review period. Agent of change wording in explanatory text 14.55. Plan should be read as a whole
Comment: The Planning service team has looked at Policies relation to Minerals and Waste and have the following comments. Support the policy, the mineral safeguarding area which adjoins the North Yorkshire County Council boundary matches the North Yorkshire County Council safeguarded area. The reference to 'Agent of Change' in paragraph 14.55 is also supported.


Response: Comment Noted
FCC also supports Policy 62 'Providing for and Safeguarding Mineral Resources' particularly the following statements, "The extraction and production of aggregate, industrial, building stone and energy minerals that contribute to infrastructure and construction projects will be supported. 7. Identifying on the Policies Map minerals and ancillary minerals infrastructure to be safeguarded from non-mineral development during and beyond the plan period". This is considered to be in line with paragraph 203 of the NPPF which states that "It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs?" and paragraph 204 "Planning policies should c) safeguard mineral resources by defining Mineral Safeguarding Area; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided?". As such, the Local Plan Publication Draft is considered to be consistent with national policy. Under the submission Policies Map and as illustrated on Table 15 in the Local Plan Publication Draft, FCC's Barnsdale Bar landholding is located within a Minerals Safeguarding Area. FCC support this allocation and are currently investigating the potential to extend the existing Barnsdale Bar Quarry to the south between Woodfield Road and Long Lane.

**Summary:**

FCC also supports Policy 62 'Providing for and Safeguarding Mineral Resources' particularly the following statements, "The extraction and production of aggregate, industrial, building stone and energy minerals that contribute to infrastructure and construction projects will be supported. 7. Identifying on the Policies Map minerals and ancillary minerals infrastructure to be safeguarded from non-mineral development during and beyond the plan period". This is considered to be in line with paragraph 203 of the NPPF which states that "It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs?" and paragraph 204 "Planning policies should c) safeguard mineral resources by defining Mineral Safeguarding Area; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided?". As such, the Local Plan Publication Draft is considered to be consistent with national policy. Under the submission Policies Map and as illustrated on Table 15 in the Local Plan Publication Draft, FCC's Barnsdale Bar landholding is located within a Minerals Safeguarding Area. FCC support this allocation and are currently investigating the potential to extend the existing Barnsdale Bar Quarry to the south between Woodfield Road and Long Lane.

**Response:**

Support noted.
It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods the country needs. Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation. Paragraph 205 - "When determining planning applications, great weight should be given to the benefits of mineral extraction, including to the economy. In considering proposals for mineral extraction, minerals planning authorities should:

a) as far as is practical, provide for the maintenance of landbanks of non-energy minerals from outside National Parks, the Broads, Areas of Outstanding Natural Beauty and World Heritage Sites, scheduled monuments and conservation areas; b) ensure that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety, and take into account the cumulative effect of
multiple impacts from individual sites and/or from a number of sites in a locality; c) ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source, and establish appropriate noise limits for extraction in proximity to noise sensitive properties; d) not grant planning permission for peat extraction from new or extended sites; e) provide for restoration and aftercare at the earliest opportunity, to be carried out to high environmental standards, through the application of appropriate conditions. Bonds or other financial guarantees to underpin planning conditions should only be sought in exceptional circumstances; f) consider how to meet any demand for small-scale extraction of building stone at, or close to, relic quarries needed for the repair of heritage assets, taking account of the need to protect designated sites; and g) recognise the small-scale nature and impact of building and roofing stone quarries, and the need for a flexible approach to the duration of planning permissions reflecting the intermittent or low rate of working at many sites. The proposals are considered compliant with the existing Doncaster Core Strategy 2011-2028 - Policy CS20: Minerals and the following proposed policies set out in the emerging new Local Plan 2015-2035: - Policy 62: Providing for and Safeguarding Mineral Resources (Strategic Policy); - Policy 63: Mineral Development Proposals, Borrow Pits and Incidental Extraction and - Policy 64: Reclamation of Mineral Sites (Restoration and Aftercare). The Proposed Development fulfils a number of strategic objectives including sustaining sand and gravel mineral production, retaining jobs and supporting wider economic development, which ultimately support and complement the objectives of the emerging Doncaster Local Plan. The proposals are unlikely to result in any adverse environmental effects that would be a constraint to development, with any planning application supported by an Environmental Statement and EIA technical assessments. As such the proposals are considered broadly positive, to which significant weight should be afforded. Overall, we support and commend the allocation of Grange Farm as a preferred minerals site. The Local Planning Authority can also be assured that detailed proposals and an Environmental Impact Assessment is being progressed to bring forward the Site as quickly as possible, accounting for scarcity of concreting aggregate resources, under the current extant planning policy position. As such, it is not only considered Sound to allocate provision of mineral from the Site, it is also practical and Effective. i.e. the proposals have operator commitment, are currently being detailed up and would be considered deliverable over the early years of the plan period. We would however request the Council to consider accounting for and recognising the existence of the Ninescores Farm IDO (registered planning permission) through its LAA process in support of the emerging Local Plan, for which it is intended to bring forward and regularise the Ninescores permission as a composite part of the Grange Farm mineral planning proposals on the basis of maximising the valuable resources at the Site, particularly in respect of sharp sand and concreting aggregates. This will be further justified on sustainable minerals recovery. Also enclosed are the following documents: - CE - Doc 1 - Doncaster Local Plan - Local Plan evidence Base - Assessing Mineral Site Representations - Land at Grange Farm Representation - CE - Doc 2 - Mineral Sites Map - Site Reference - 1011 (SEE EMAIL FOR Appendices)

Summary:

Legally Compliant - Yes Sound - Yes The emerging Doncaster Local Plan 2015-2035 supports the inclusion of Land at Grange Farm, as a proposed new mineral allocation Site - Reference 1011. Site offers approximately 1.55 million tonnes of sand and gravel mineral reserve North Lincs Property Holdings (our client) want to include land at Ninescores Farm, Finningley, Doncaster, DN93DY (land adjacent site to Grange Farm) (site extension) Ninescores Farm, has an Interim Development Order (IDO) providing approximately 400,000 to 600,000 tonnes of additional sand and gravel reserve. The composite application proposal, will enable mineral reserves to be blended on Site, ensuring that the locally and regionally scarce mineral reserves found at the Site, (i.e. the sharp sand / concreting aggregates) Grange Farm area 40ha and Ninescores Farm 24ha The proposal will contribute an estimated reserve 2.1Mt The representation highlights the Core Strategy, Emerging Local Plan and 2018 LAA. ‘Historic returns have confirmed that only a small proportion of the remaining permitted reserve in Doncaster is however suitable for use as concreting aggregate’ Proposal complies with NPPF paragraphs 203 and 205. Proposal compliant with Core Strategy CS20 and emerging Local Plan Policies 62, 63, 64. The Proposed Development fulfils a number of strategic objectives including sustaining sand and gravel mineral production, retaining jobs and supporting wider economic development, which ultimately support and complement the objectives of the emerging Doncaster Local Plan. Overall, we support and commend the allocation of Grange Farm as a preferred minerals site.

Response:

Comment noted. The site is allocated in the Local Plan as there is a need for sharp sand and gravel in Doncaster. Comment noted. The additional site NineScores Farm has been identified as a late site addition, which require SAIing Comment noted. If the proposal comes forward as application before submission of the Local Plan the application will be assessed using the Core Strategy and UDP policies.
Comment:
That which relates to Stainton Quarry. The Town Council support the Plan and not to include provision for any extension of the Quarry activity for wider limestone mineral extraction in the areas that Breedon’s would like to develop. The Town Council support the comment on there being sufficient landbanked mineral supplies for the next 25 years and do not want to see any further extension beyond that which is regulated by the existing permission or any encroachment further towards Edlington/Old Edlington.

Summary:
Supports the plan as legally compliant and ‘sound’. In respect to Stainton Quarry, the Town Council supports the Plan’s decision not to include provision for any extension of the Quarry activity for wider limestone mineral extraction. The Town Council support the comment on there being sufficient land banked mineral supplies for the next 25 years and do not want to see any further extension beyond that which is regulated by the existing permission or any encroachment further towards Edlington/Old Edlington.

Response:
Support welcomed. Representation’s reference to pages 20 and 22 are references to the Minerals Site Selection Methodology Report (May 2018) rather than the Local Plan document.
MARSHALLS ACKNOWLEDGE AND SUPPORT DMBCS PROPOSED ALLOCATION OF ITS STAINTON MINERALS PROCESSING AND CONCRETE PRODUCT WORKS AS SAFEGUARDED ANCILLARY MINERALS INFRASTRUCTURE WITHIN THE DRAFT PLAN.

Supports the continued allocation of the Maltby/Stainton site (ref 006 Holme Hall Quarry) as a 'Safeguarded Ancillary Minerals Infrastructure' site, as per Local Plan Table 14.
The Coal Authority supports the inclusion of Policy 63: Minerals Development Proposals, Borrow Pits and Incidental Extraction which sets out criteria again which proposals will be considered.

Summary:
supports the inclusion of Policy 63: Minerals Development Proposals, Borrow Pits and Incidental Extraction

Response:
Comment noted
Comment Ref: C/Policy 63/01747/2/002

Name: Sheffield Area Geology Trust

Organisation: Sheffield Area Geology Trust

Representing:

Comment Ref: C/Policy 63/01747/2/002

Attend Examination: Written Representation

Reason:

Area: Chapter 14: Climate Change, Mineral Resources & Energy

Policy: Policy 63: Minerals Development Proposals, Borrow Pits & Incidental Extraction

Tests of Soundness: Unsound - not stated

In addition, in October 2018 we submitted the following suggestion with regard to policy 63. 'We suggest the inclusion of another requirement which encourages a developer to permit temporary access to excavations in superficial and bedrock geology for the purpose of recording geological data, some of which may be rarely-seen, by suitably qualified experts.' We note that our suggestion, sadly has not been adopted in the Local Plan Publication version (August 2019). We can not stress enough the value of having access to such sites in recording features of the underlying geology and would like it to be included for this reason.

Summary:

Policy 63. Not added previous suggestion? "We suggest the inclusion of another requirement which encourages a developer to permit temporary access to excavations in superficial and bedrock geology for the purpose of recording geological data, some of which may be rarely-seen, by suitably qualified experts."

Response:

Comment noted. Covered by policy 31. A6
Comment:
The policy needs expanding to make it effective as follows; Proposed Changes (deletions in strikethrough; new text in bold) - These cannot be shown therefore deletions shown in brackets with X either sides (x deleted text x) and new text in CAPITAL) Proposals for mineral development including aggregate extraction (in preferred areas and areas of search), underground mining and hydrocarbon exploration, appraisal and development (including production) will be supported where all potential impacts are addressed and appropriately mitigated in accordance with policies in the Local Plan, national policy and guidance. Incidental mineral extraction and borrow pits will be supported where: A) the use of reclaimed, recycled or waste material has been considered and is not practical or suitable; B) the proposal is short term and provides a clear amenity, environmental or local economic benefit; and C) (x the borrow pit is situated next to and used only for the project it is intended to supply X) SAND AND GRAVEL BORROW PITS WILL ONLY BE CONSIDERED WHERE IT IS DEMONSTRATED THAT: 1. GEOGRAPHICALLY THEY ARE WELL RELATED TO THE PROJECT THEY WILL SERVE 2. THE QUANTITY AND TIMESCALE FOR THE SUPPLY OF SAND AND GRAVEL MAY NOT POSE PROBLEMS OF SUPPLY FROM EXISTING QUARRIES, OR PREJUDICE THE STEADY SUPPLY OF CONSTRUCTION MATERIAL FOR THE LOCAL MARKET 3. AN UNACCEPTABLE LEVEL OF MINERAL TRAFFIC, AND / OR MOVEMENTS OF UNSUITABLE MATERIAL ARISING FROM THE SCHEME, WILL BE REMOVED FROM THE PUBLIC HIGHWAY AND / OR FROM PASSING THROUGH LOCAL COMMUNITIES 4. THE SITE WILL BE RESTORED WITHIN THE SAME TIMESCALE AS THE PROJECT TO WHICH IT RELATES, AND THAT RESTORATION CAN BE ACHIEVED TO AN APPROVED SCHEME IN THE EVENT THAT IT IS ONLY PART WORKED 5. THERE WILL BE NO IMPORTATION OF MATERIALS OTHER THAN FROM THE PROJECT ITSELF UNLESS REQUIRED TO ACHIEVE BENEFICIAL RESTORATION AS SET OUT IN AN APPROVED SCHEME. D) PROPOSALS FOR DEVELOPMENT INVOLVING THE INCIDENTAL EXTRACTION AND OFF SITE REMOVAL OF MINERAL, WILL ONLY BE PERMITTED WHERE IT CAN BE DEMONSTRATED: 1. THERE IS A PROVEN NEED FOR THE PROPOSAL 2. THAT ANY MINERAL EXTRACTED WILL BE USED IN A SUSTAINABLE MANNER 3. WHERE THE PROPOSAL RELATES TO A RESERVOIR, THE DESIGN MINIMISES ITS SURFACE AREA BY MAXIMISING ITS DEPTH 4. THE MINIMUM AMOUNT OF MINERAL IS TO BE EXTRACTED CONSISTENT WITH THE PURPOSE OF THE DEVELOPMENT 5. THE PHASING AND DURATION OF DEVELOPMENT PROPOSED ADEQUATELY REFLECTS THE IMPORTANCE OF THE EARLY DELIVERY OF WATER RESOURCES OR OTHER APPROVED DEVELOPMENT THE DETERMINATION OF PLANNING APPLICATIONS WILL HAVE REGARD TO THE OBJECTIVES AND POLICIES IN THIS PLAN.

Summary:
Policy 63 proposed (x deletions x) and additions (in capitals) C) (x the borrow pit is situated next to and used only for the project it is intended to supply x) SAND AND GRAVEL BORROW PITS WILL ONLY BE CONSIDERED WHERE IT IS DEMONSTRATED THAT: 1. GEOGRAPHICALLY THEY ARE WELL RELATED TO THE PROJECT THEY WILL SERVE 2. THE QUANTITY AND TIMESCALE FOR THE SUPPLY OF SAND AND GRAVEL MAY NOT POSE PROBLEMS OF SUPPLY FROM EXISTING QUARRIES, OR PREJUDICE THE STEADY SUPPLY OF CONSTRUCTION MATERIAL FOR THE LOCAL MARKET 3. AN UNACCEPTABLE LEVEL OF MINERAL TRAFFIC, AND / OR MOVEMENTS OF UNSUITABLE MATERIAL ARISING FROM THE SCHEME, WILL BE REMOVED FROM THE PUBLIC HIGHWAY AND / OR FROM PASSING THROUGH LOCAL COMMUNITIES 4. THE SITE WILL BE RESTORED WITHIN THE SAME TIMESCALE AS THE PROJECT TO WHICH IT RELATES, AND THAT RESTORATION CAN BE ACHIEVED TO AN APPROVED SCHEME IN THE EVENT THAT IT IS ONLY PART WORKED 5. THERE WILL BE NO IMPORTATION OF MATERIALS OTHER THAN FROM THE PROJECT ITSELF UNLESS REQUIRED TO ACHIEVE BENEFICIAL RESTORATION AS SET OUT IN AN APPROVED SCHEME. D) PROPOSALS FOR DEVELOPMENT INVOLVING THE INCIDENTAL EXTRACTION AND OFF SITE REMOVAL OF MINERAL, WILL ONLY BE PERMITTED WHERE IT CAN BE DEMONSTRATED: 1. THERE IS A PROVEN NEED FOR THE PROPOSAL 2. THAT ANY MINERAL EXTRACTED WILL BE USED IN A SUSTAINABLE MANNER 3. WHERE THE PROPOSAL RELATES TO A RESERVOIR, THE DESIGN MINIMISES ITS SURFACE AREA BY MAXIMISING ITS DEPTH 4. THE MINIMUM AMOUNT OF MINERAL IS TO BE EXTRACTED CONSISTENT WITH THE PURPOSE OF THE DEVELOPMENT 5. THE PHASING AND DURATION OF DEVELOPMENT PROPOSED ADEQUATELY REFLECTS THE IMPORTANCE OF THE EARLY DELIVERY OF WATER RESOURCES OR OTHER APPROVED DEVELOPMENT THE DETERMINATION OF PLANNING APPLICATIONS WILL HAVE REGARD TO THE OBJECTIVES AND POLICIES IN THIS PLAN.

Response:
Policy 63. Comments noted. No proposed changes. MPA suggested borrow pit policy additions to restrictive and not positively prepared?. Example suggestion "BORROW PITS WILL ONLY BE CONSIDERED?" Applications will be addressed on their merits in line with policy 63 and relevant policies in the Local Plan.
Comment Ref: C/Policy 63/05170/1/004
Name: North Yorkshire County Council
Organisation: North Yorkshire County Council
Representing: 
Comment Ref: C/Policy 63/05170/1/004
Attend Examination: Not Stated
Reason: 
Area: Chapter 14: Climate Change, Mineral Resources & Energy
Policy: Policy 63: Minerals Development Proposals, Borrow Pits & Incidental Extraction
Tests of Soundness: 
Comment: The Planning service team has looked at Policies relation to Minerals and Waste and have the following comments. Support the policy.
Response: Comment Noted
The Coal Authority supports Policy 64: Reclamation of Mineral Sites which requires restoration and aftercare of minerals sites which provide benefits that enhance the quality of the land.

Supports inclusion of Policy 64: Reclamation of Mineral Sites.

Comment noted
Tests of Soundness: Unsound - not stated

Comment:
In relation to policy 64 in October 2018 we submitted: 'we suggest that it will be advantageous to include another requirement in sub-paragraph B which encourages the permanent conservation of geological assets and the retention, where possible, of pre-existing or newly-created geological exposures and features for future study by the scientific community and appreciation the public'. We were pleased to note the inclusion of this statement in the Local Plan Publication version (August 2019)

Summary:
Policy 64. Pleased to see suggested inclusion (from previous consultation stage) added to sub-paragraph B

Response:
Comment noted.
Tests of Soundness:

Comment:
UKOOG Response: Onshore oil and gas sites are temporary, and the land is restored to it's former or an agreed improved use once the wells have been decommissioned. Once a site is restored an operator cannot relinquish its environmental permits until the EA are satisfied that there are no-longer any risks to the environment. This can take up to 5 years. An operator will agree restoration and aftercare conditions with the planning authority inline with the requirements of the EA and HSE (well decommissioning) where relevant.

Summary:
Policy 64. Onshore oil and gas sites are temporary. Operator will agree restoration and aftercare conditions with the planning authority in line with the requirements of the EA and HSE.

Response:
Comment noted.
Onshore oil and gas sites are temporary, and the land is restored to its former or an agreed improved use once the wells have been decommissioned. Once a site is restored an operator cannot relinquish its environmental permits until the EA are satisfied that there are no longer any risks to the environment. This can take up to 5 years. An operator will agree restoration and aftercare conditions with the planning authority in line with the requirements of the EA and HSE (well decommissioning) where relevant.

**Summary:**

Onshore oil and gas sites are temporary, and the land is restored to its former or an agreed improved use once the wells have been decommissioned. Once a site is restored an operator cannot relinquish its environmental permits until the EA are satisfied that there are no longer any risks to the environment. This can take up to 5 years. An operator will agree restoration and aftercare conditions with the planning authority in line with the requirements of the EA and HSE (well decommissioning) where relevant.

**Response:**

Comment noted. Policy 64 pertains to all mineral sites not just hydrocarbons. The Planning Authority will work with other regulatory bodies when and where appropriate.
Comment: Like all mineral sites, onshore oil and gas sites are temporary, and on completion of development, the land is restored to its former or an agreed improved use once the wells have been decommissioned. Once a site is restored an operator cannot relinquish its environmental permits until the EA are satisfied that there are no-longer any risks to the environment. This can take up to 5 years. An operator will agree restoration and aftercare conditions with the planning authority in line with the requirements of the EA and HSE (well decommissioning) where relevant.

Summary:
Policy 64. For hydrocarbons, operators will agree restoration and aftercare conditions with planning authority in line with EA and HSE well decommissioning requirements.

Response:
Comment noted
**Comment Ref:** C/Policy 64/05170/1/005

**Name:** North Yorkshire County Council

**Organisation:** North Yorkshire County Council

**Date:** 08/10/2019

**Representing:**

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**Comment:**

The Planning service team has looked at Policies relation to Minerals and Waste and have the following comments. Support the policy

**Summary:**


**Response:**

Comment Noted
Tests of Soundness:

Comment:

This policy has been significantly altered and shortened compared to the previous version. Our comments have not been taken into account and there is no explanation in the consultation summary. However, we note that paragraph 14.73 makes reference to working with all the relevant key regulators. The Environment Agency is one of the member organisations which forms the Shale Environmental Regulator Group (SERG). SERG is committed to helping Mineral Planning Authorities to understand and have confidence in the role and decisions of regulators.

Summary:

Policy 65 - Providing for Energy Minerals - the policy has been significantly altered since the last consultation and cannot see reference to comments made previously although note reference to working with all relevant key regulators which would include the EA

Response:

Noted - the Policy has been significantly amended as a result of the last consultation. There is no political support for unconventional hydrocarbon extraction and as such applications will be determined in line with national policy and guidance.
Unsound because: - Is not justified: it fails to take properly into account local constraints to development; - Is not effective: without suitable constraint-related policy criteria, there is a substantial risk that development will be inconsistent with the proper protection of rural areas of the Borough; Oil and gas exploration and production (especially for unconventional hydrocarbons, including use of hydraulic fracturing) have a related but different set of impacts from other minerals (aggregates and industrial minerals) and these need to be addressed by specific policies if such development is to be properly controlled and mitigated. We are unclear as to why 'conventional and unconventional hydrocarbons (text in first sentence of 14.72) is italicised. Suggest change to plain (Roman) text. PROPOSED CHANGE Remove current Policy 65 in its entirety and substitute the below: Policy 65 Proposals for exploration and appraisal of hydrocarbons Proposals for exploration and appraisal of onshore oil and gas will be permitted where they meet all of the following criteria:  a. well sites and associated facilities are located in the least sensitive areas from which the target reservoir can be accessed;  b. any adverse impacts can be avoided or mitigated to the satisfaction of the Mineral Planning Authority, with safeguards to protect highway, environmental and amenity interests put in place as necessary;  c. it can be demonstrated that there would be no adverse impact on the underlying integrity of the geological structure or on groundwater or surface water regimes;  d. an indication of the extent of the reservoir and the extent of the area of search within the reservoir is provided;  e. exploration and appraisal operations are for an agreed, temporary length of time;  f. well sites and associated facilities are restored at the earliest practicable opportunity if oil and gas is not found in economically viable volumes, or they are developed within an agreed time frame. Policy 66 Proposals for production of hydrocarbons Proposals for the production of hydrocarbons will be considered against the following criteria:  a. Exploration and appraisal operations are for an agreed, temporary length of time.  b. Extraction, processing, dispatch and transport facilities are sited, designed and operated to minimise environmental and amenity impacts and provide proportionate environmental enhancements.  c. Any adverse impacts, both individual and cumulative can be avoided or mitigated to the satisfaction of the Mineral Planning Authority.  d. Existing facilities are used for the development of any additional fields discovered unless the applicant satisfies the Mineral Planning Authority that this would not be feasible and any adverse impacts can be mitigated.  e. Where a proposal uses existing production facilities, the integrity of the existing infrastructure can be demonstrated, having regard to local environmental factors.  f. Developments for hydrocarbon production will be required to use pipelines. Where it can be demonstrated that this is not feasible, economically and/or environmentally, rail or road transport will be considered. Where road transportation is the only feasible option, it should be demonstrated that this would not give rise to unacceptable impacts on the environment or highway safety.  g. The well site and all associated facilities are restored at the earliest practicable opportunity following the final cessation of hydrocarbon production.  h. Where a proposal demonstrates that it will have a net zero impact on climate change. Amend Explanation text as follows: 14.70. In line with national guidance 'Petroleum Exploration and Development Licences' and permitted hydrocarbon sites will be are shown on the Policies Map for information. Applications for the exploration, appraisal and development (including production) of on-shore gas and oil in licenced areas will be determined in line with National Policy, Guidance and Policies 65 and 66 above. Add to explanatory text, insert at (new) 14.73 and retain current 14.73 text as 14.77 and renumber remaining text 14.78, (Peat and other minerals)14.79 and 14.80 : 14.73 If economic concentrations of hydrocarbons are found, the operator may seek to develop the field commercially. Small fields may be exploited using the existing exploration and appraisal wells where oil/gas can be stored on site, with tankers transporting the hydrocarbon off site. However, larger fields may require additional wellhead sites linked by pipelines. 14.74 Directional drilling, whereby a number of wells are drilled from a single location, may be used to minimise the number of sites required to exploit the field. Directional drilling is considered preferable to the creation of additional well sites. Above ground facilities including, potentially, a gathering station to provide a central facility to prepare the hydrocarbons for export, transport links, pipelines and offices may be required. Impacts similar to industrial development may be experienced, with pollution prevention being a potential long-term issue. 14.75 As there is likely to be some flexibility as to the location of extraction and processing facilities, they should be located to minimise adverse effects on landscape, nature conservation interests, residential amenity, historic environment and best and most versatile agricultural land. 14.76 Consideration will need to be given to the use of tree screens and appropriately managed areas around well sites or facilities in order to reduce visual impact. Additionally, where areas are sensitive ecologically, opportunities for habitat management should be explored.

Summary:

Unsound as: - Unjustified and does not take properly into account local development constraints - Ineffective without constraint related criteria, there is risk development will be inconsistent with proper protection of rural areas in the borough. Oil and gas have different impact to other minerals and need to be separately addressed in specific policies, if development is to be controlled and mitigated properly. Unclear why 'conventional and unconventional hydrocarbons (text in first sentence of 14.72) is italicised. Suggest normal text. Proposed change: Remove current Policy 65 in its entirety and substitute the below: Policy 65 Proposals for exploration and appraisal of hydrocarbons Proposals for exploration and appraisal of onshore oil and gas will be permitted where they meet all of the following criteria:  a. well sites and associated facilities are located in the least sensitive areas from which the target reservoir can be accessed;  b. any adverse impacts can be avoided or mitigated to the satisfaction of the Mineral Planning Authority, with safeguards to protect highway, environmental and amenity interests put in place as necessary;  c. it can be demonstrated that there would be no adverse impact on the underlying integrity of the geological structure or on
d. an indication of the extent of the reservoir and the extent of the area of search within the reservoir is provided; e. exploration and appraisal operations are for an agreed, temporary length of time; f. well sites and associated facilities are restored at the earliest practicable opportunity if oil and gas is not found in economically viable volumes, or they are developed within an agreed time frame. Policy 66 Proposals for production of hydrocarbons Proposals for the production of hydrocarbons will be considered against the following criteria: a. Exploration and appraisal operations are for an agreed, temporary length of time. b. Extraction, processing, dispatch and transport facilities are sited, designed and operated to minimise environmental and amenity impacts and provide proportionate environmental enhancements. c. Any adverse impacts, both individual and cumulative can be avoided or mitigated to the satisfaction of the Mineral Planning Authority. d. Existing facilities are used for the development of any additional fields discovered unless the applicant satisfies the Mineral Planning Authority that this would not be feasible and any adverse impacts can be mitigated. e. Where a proposal uses existing production facilities, the integrity of the existing infrastructure can be demonstrated, having regard to local environmental factors. f. Developments for hydrocarbon production will be required to use pipelines. Where it can be demonstrated that this is not feasible, economically and/or environmentally, rail or road transport will be considered. Where road transportation is the only feasible option, it should be demonstrated that this would not give rise to unacceptable impacts on the environment or highway safety. g. The well site and all associated facilities are restored at the earliest practicable opportunity following the final cessation of hydrocarbon production. h. Where a proposal demonstrates that it will have a net zero impact on climate change. Amend Explanation text as follows: 14.70. In line with national guidance 'Petroleum Exploration and Development Licences' and permitted hydrocarbon sites will be are shown on the Policies Map for information. Applications for the exploration, appraisal and development (including production) of on-shore gas and oil in licenced areas will be determined in line with National Policy, Guidance and Policies 65 and 66 above. Add to explanatory text, insert at (new) 14.73 and retain current 14.73 text as 14.77 and renumber remaining text 14.78, (Peat and other minerals)14.79 and 14.80 : 14.73 If economic concentrations of hydrocarbons are found, the operator may seek to develop the field commercially. Small fields may be exploited using the existing exploration and appraisal wells where oil/gas can be stored on site, with tankers transporting the hydrocarbon off site. However, larger fields may require additional wellhead sites linked by pipelines. 14.74 Directional drilling, whereby a number of wells are drilled from a single location, may be used to minimise the number of sites required to exploit the field. Directional drilling is considered preferable to the creation of additional well sites. Above ground facilities including, potentially, a gathering station to provide a central facility to prepare the hydrocarbons for export, transport links, pipelines and offices may be required. Impacts similar to industrial development may be experienced, with pollution prevention being a potential long-term issue. 14.75 As there is likely to be some flexibility as to the location of extraction and processing facilities, they should be located to minimise adverse effects on landscape, nature conservation interests, residential amenity, historic environment and best and most versatile agricultural land. 14.76 Consideration will need to be given to the use of tree screens and appropriately managed areas around well sites or facilities in order to reduce visual impact. Additionally, where areas are sensitive ecologically, opportunities for habitat management should be explored.

Response:
Comments noted. No proposed change to policy 65 or additional policy and text changes. The Policy has been significantly amended as a result of the previous informal consultation in 2018. There is no political support for hydrocarbon extraction and as such applications will be determined in line with the positively prepared national policy and guidance as identified by the policy.
The Coal Authority supports the inclusion of Policy 65: Providing for Energy Minerals which states that PEDL areas will be identified on the Policies Maps. We are also pleased to see that this policy notes that applications which come forward will be considered in line with National and relevant Local Policies.
C/Policy 65/05014/1/014
Chapter 14: Climate Change, Mineral Resources & Energy

Policy 65: Providing for Energy Minerals

Tests of Soundness:

Comment:

UKOOG Response: Policy 65 states; ‘Petroleum Exploration and Development Licence’ (PEDL) areas and hydrocarbon sites are identified on the Policies Map for information. Applications for the exploration, appraisal and development (including production) of on-shore gas and oil in licenced areas will be determined in line with National Policy, Guidance and relevant policies within the Local Plan. And provides explanatory text as follows; 14.70. In line with national guidance ‘Petroleum Exploration and Development Licences’ and permitted hydrocarbon sites will be shown on the Policies Map for information. 14.71. The Government awards PEDLs to operators to give exclusive access to operators to ‘search, bore for and get’ oil and gas resources which are owned by the Crown. The award of the licence is to help ensure maximum use of a natural resource. Operators are still required to get landowner consent, planning permission and other regulatory consents as necessary. The online ‘Onshore Oil and Gas Activity’ interactive map provides information on licence references, ownership, start date, status, size, and licence end date. 14.72. National planning policy states that both conventional and unconventional hydrocarbons (gas and oil) are minerals of national and local importance and that Minerals Plans (i.e. the Local Plan) should include policies for their extraction. This includes applications for both conventional and unconventional hydrocarbons. Applications for hydrocarbon exploration, appraisal or production, will only be acceptable in areas where the Oil and Gas Authority have issued a petroleum licence under the Petroleum Act 1998 (a Petroleum Licence). Hydrocarbon applications will be determined in line with national policy, planning practice guidelines and relevant policies in this plan. Applicants are encouraged to engage with the planning authority and local community at the earliest opportunity to ensure all potential impacts are addressed and mitigated at each separate planning application stage. Applications which include (or may include) proposals for hydraulic fracturing will also be required to produce an Environmental Impact Assessment (EIA). Proposals which may damage the integrity of Thorne Moor SAC, Hatfield Moor SAC or Thorne and Hatfield Moors SPA will not be supported in line with Policy 31. 14.73. When determining applications the Council will consult and work with all the relevant key regulators and organisations. 14.74. Applications for underground gas storage and carbon storage will also be considered against national policy and guidance, and relevant policies within the Local Plan. Peat and other minerals 14.75. Peat is an economically important mineral resource and Thorne and Hatfield Moors are the largest lowland peat resources in the country. These deposits, however, occur within internationally designated conservation areas where, in line with national guidance, peat extraction (other than as part of on-site restoration) will not be supported. However, where peat is found in areas outside the moors, such as the land to the north of the West Moor link road at junction 4 of the M18, pre-development extraction may be considered as part of a development, re-development / regeneration project. 14.76. Applications for the extraction of other minerals (for example, coal and clay) will be considered on their merits in line with national policy, guidance, relevant policies within this Plan and the need for the mineral. ’ We are supportive of the changes made in Policy 65 and within the supporting text, which recognises the need to align with national policy and guidance (and references 'NPPG Paragraph: 106 Reference ID: 27-106-20140306. Paragraph: 107 Reference ID: 27-107-20140306 - National Planning Policy Framework paragraphs 209 to 211’), we are also pleased to see the inclusion of a policies map that identifies the location of granted PEDLs and permitted hydrocarbon sites, as outlined in explanation section 14.70 and 14.71. In our view it would be beneficial to expand the explanation text in 14.73 to cover the role of the other regulators, such that there is clarity on the issues that each regulator addresses outside of the planning system. This would ensure that any confusion over the role of the other regulators is avoided. With respect to the specific wording of Policy 65, in our view there would be benefit in expanding the policy text covering the 3 distinct phases of hydrocarbon development; Exploration, Appraisal and Production. It is important that the criteria established elsewhere in the local plan can be applied proportionately against the relevant development stage, as the planning issues associated with each stage are significantly varied, both in terms of scale and duration. Furthermore, we believe the term ‘determined’ should be replaced with ‘supported’, where a proposed development is in line with National Policy, Guidance and meets the relevant policies within the Local Plan’. We note that there are no specific policies covering, or references made to, other energy minerals, such as coal or mine methane, except for a short statement on paragraph 14.76. In our view policy 65 should include text on Mine Methane and Coal, such that these important energy minerals are sufficiently addressed.

Summary:

Policy 65. Supportive of change to policy 65. Wording should be changed further. The word ‘determined’ should be replaced with the word ‘supported’. The policy text covering the 3 distinct phases of hydrocarbon development; Exploration, Appraisal and Production should be expanded. Note no references made to other energy minerals, such as coal or mine methane, except for a short statement on paragraph 14.76

Reason:

Area: Chapter 14: Climate Change, Mineral Resources & Energy

Response:

Policy 65. Comment noted. No change proposed to policy or explanatory text. It is not politically acceptable to use the word ‘support’ in the policy. Applications will be determined fairly and proportionally by development management officers in line with local policies, national policy and guidance. Phases of extraction covered in NPPG ? The role of regulators is covered in NPPG paragraph 110.
The issue raised is complex and we have found it helpful when responding to other plans for the matter to be debated. This was done most recently at East Riding of Yorkshire in January 2019 where the Inspector was able to hear the points raised on each side of the argument and to understand that there was in fact little between the parties in terms of principle. In our submission this may not have been fully apparent in reviewing written submissions and this was confirmed by the conduct of the Hearing where the Inspector thanked the parties for their frankness, helpfulness and courtesy.

**Tests of Soundness:**

Background Regulation 18 of the Development Plan Regulations requires the local planning authority to collect evidence and to identify key issues.

Unconventional gas is one such key issue. National Planning Policy Framework (NPPF) states that each planning authority should ensure that their local plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics of the area. That evidence is required to be tightly focused on supporting and justifying particular policies in the Local Plan. The UK Government’s energy policies seek to encourage the use of natural resources indigenous to the UK as part of achieving self-sufficiency in energy production and increasing security of energy and gas supplies. This covers a range of onshore hydrocarbons that include inter alia; shale, coal bed methane and oil. The Local Plan requires a policy to cover all the hydrocarbons that are potentially found in the area licenced by the Government under the Petroleum Exploration & Licence (PEDL) regime and could be extracted over the plan period. Onshore hydrocarbons are important to the UK because they are a potential long-term source of indigenous natural gas. These untapped energy resources have the potential to meet the UK’s need for a secure and diverse energy supply. The Local Plan needs to recognise that there are a range of sources of this resource and policy should cover all onshore hydrocarbons, and recognise that the planning and other regulatory process provide sufficient safeguards to enable the LDP to contain a positive statement of support for the process, in line with the support given in NPPF. Therefore, the Local Plan should address the full range of onshore hydrocarbon extraction including: - Conventional onshore oil and gas development. - Extraction of petroleum or hydrocarbon oils and gases by drilling and pumping. - Capture of methane that has accumulated in mines. - Coal bed methane and gas derived from shale reservoirs. Onshore hydrocarbon exploration and development is incremental in nature with a phased approach to exploration, appraisal and production. The initial exploration phases, if successful, determine the strategy for the development of the PEDL area. With CBM, testing the ability of a coal seam to produce commercial volumes of gas cannot be achieved with the use of one borehole. Typically a number of boreholes will be drilled across a known isolated slab of coal within a Licence Area. These wells will then be pumped as a collective to have a uniform drainage effect on the coal. Commercial production will be determined by the volume of gas being produced when the volume of water that is being produced has reached a plateau. If the initial Pilot Test is successful additional wells are added to the initial appraisal cluster in order to scale up the production and commercialisation of an area. Each well bore is expected to have a useful production life of up to 25 years. Shale gas also requires a number of boreholes across the Licence area. These boreholes will be tested and, if commercial production is determined to be achievable, additional wells may be added to the initial cluster. Each shale wellbore is expected to have a useful production life of up to 25 years. Similar principles apply to exploration of the other onshore hydrocarbon resources identified above. In every case there is strong regulation outside the planning process. Planning provides significant controls to monitor the land use implications. Having regard to these safeguards there is no reason for the Local Plan not to contain a positive statement of support through policy and its supporting text. Support within the Local Plan and future associated documents is therefore essential to enable long term onshore hydrocarbon development strategy to realise these nationally valuable resources.

Suggested Policy Approach We set out below draft supporting text and policy that we would like to see incorporated into the Local Plan. It notes that the main concerns are with the environment and residential amenity but as there are other policies dealing with such impacts, each containing assessment criteria, Policy 65 of the plan does not need to list these considerations in its policy. The supporting text should provide background and justification, which links to the National Planning Policy Framework and other Government policies, and the PEDLs are mapped and safeguarded. The suggested approach is informed by the Written Ministerial Statements (WMS) of May 2018 and May 2019 and the revised NPPF. (a) Written Ministerial Statements The WMS of May 2018 and May 2019 are material consideration and should be given great weight as a statement of national policy, especially given that the announcement is so recent. The WMS of May 2018 confirms its status by noting that This Statement is a material consideration in decision-taking, alongside relevant policies of the existing National Planning Policy Framework (2012), in particular those on mineral planning (including conventional and unconventional hydrocarbons). The statement is also clear that Shale gas development is of national importance. The Government expects Mineral Planning Authorities to give great weight to the benefits of mineral extraction, including to the economy. This includes shale gas exploration and extraction. It therefore directly applies to the draft Local Plan minerals policies and confirms the importance to the country of undertaking the activity proposed by the development. It is Government’s view that there are potentially substantial benefits from the safe and sustainable exploration and development of our onshore shale gas resources. The Statement notes that This joint statement should be considered in planning decisions and plan-making in England. This confirms that Government considers there are potentially benefits arising from shale exploration. Again, we would expect that draft Plan will give great weight to this strategic factor. WMS also states that The UK must have safe, secure and affordable supplies of energy with carbon emissions levels that are consistent with the carbon budgets defined in our Climate Change Act and our international obligations. We believe that gas has a key part to play in meeting these objectives both currently and in the future. It also observes that Gas still makes up around a third of our current energy usage and every scenario proposed by the Committee on Climate Change setting out how the UK could meet its legally-binding 2050 emissions reduction target includes demand for natural gas. Furthermore it states that The UK must have safe secure and
affordable supplies of energy" and estimates that we could be importing up to 72% of our gas by 2030. This confirms that unconventional hydrocarbons does not conflict with climate change objectives, and that it is necessary to continue to explore and ultimately extract gas in the UK in order to provide a local and secure source of gas. On this basis, Government believe[s] that it is right to utilise our domestic gas resources to the maximum extent and exploring further the potential for onshore gas production from shale rock formations in the UK, where it is economically efficient, and where environment impacts are robustly regulated. INEOS considers that unconventional hydrocarbons have a material benefit in the form of information to help assess the future potential for shale gas extraction in this area of the country, and that it accords with the requirement to assess environmental effects robustly. The WMS notes that a new shale gas exploration and production sector could provide a new economic driver and that the sector could create a "new model" of the most environmentally robust onshore shale gas sector. Without developments progressing, these opportunities will not be realised. It also sets out proposals to consult on whether certain unconventional hydrocarbons development should in fact be considered to be permitted development. This indicates that Government's view is that this type of development is not likely to have significant enough effects to warrant express planning control. The Secretary of State on 23rd May 2019 reiterated support for the onshore oil and gas industry in planning terms: On the 6th of March 2019, Mr Justice Dove handed down his judgment in the case of Stephenson vs SoS MHCLG [2019] EWHC 519 (Admin). In accordance with the terms of the Court Order, paragraph 209(a) of the National Planning Policy Framework has been quashed. For the avoidance of doubt the remainder of the National Planning Policy Framework policy and, in particular, Chapter 17 on 'Facilitating the Sustainable Use of Minerals' remain unchanged and extant. For the purposes of the National Planning Policy Framework, hydrocarbon development (including unconventional oil and gas) are considered to be a mineral resource. Specific policy on the planning considerations associated with their development is set out at paragraphs 203-205 and the remainder of 209 of the National Planning Policy Framework. In particular, paragraph 204(a) of the National Planning Policy Framework states that planning policies should "provide for the extraction of mineral resources of local and national importance" with paragraph 205 stating that "[w]hen determining planning applications, great weight should be given to the benefits of mineral extraction, including to the economy". In addition, the Written Ministerial Statements of 16th September 2015 on 'Shale Gas and Oil Policy' and 17th May 2018 on 'Planning and Energy Policy' also remain unchanged and extant. The Written Ministerial Statements sit alongside the National Planning Policy Framework. Planning Practice Guidance is also unaffected by the ruling. This suite of policies and guidance remain material considerations in planning decision making and decision taking for hydrocarbon development and they should be afforded appropriate weighting as determined by the decision maker. We remain committed to the safe and sustainable exploration and development of our onshore shale gas resources. In summary, the text of the Local Plan should take account of the following points made in the two recent WMS, which show consistency in Government policy approach and should then be reflected in the drafting of policy: - Shale gas development is of national importance. The Government expects Mineral Planning Authorities to give great weight to the benefits of mineral extraction, including to the economy. This includes shale gas exploration and extraction. - Mineral Plans should reflect that minerals resources can only be worked where they are found and applications must be assessed on a site by site basis and having regard to their context. Plans should not set restrictions or thresholds across their plan area that limit shale development without proper justification. - The Government expects mineral planning authorities to recognise the fact that Parliament has set out in statute the relevant definitions of hydrocarbon, natural gas and associated hydraulic fracturing. In addition, these matters are described in Planning Practice Guidance, which Plans must have due regard to. - Consistent with this Planning Practice Guidance, policies should avoid undue sterilisation of mineral resources (including shale gas). (b) Publication of new NPPF Paragraph 209, as originally published, stated that mineral planning authorities should: a) recognise the benefits of on-shore oil and gas development, including unconventional hydrocarbons, for the security of energy supplies and supporting the transition to a low-carbon economy; and put in place policies to facilitate their exploration and extraction; b) when planning for on-shore oil and gas development, clearly distinguish between, and plan positively for, the three phases of development (exploration, appraisal and production), whilst ensuring appropriate monitoring and site restoration is provided for; Subsequently the High Court quashed paragraph 209(a) of the NPPF due to a lack of proper consultation. However the rest of the NPPF and in particular the parts that are supportive of development of this type are unaffected. Given the nature of the Judicial Review challenge, it was a flaw in the consultation process that was carried out rather than any express or implied admission on the part of the UK Government that its position as set out in para 209 (a) was wrong, that led to the revision. As the most recent WMS of 23rd May 2019 pointed out, the remainder of the previous supportive suite of WMS5s and the remainder of para 209 which urges mineral planning authorities to plan "positively" for each of the stages of onshore unconventional oil and gas development, remain in place. Suggested Revisions to Policy 65 Whilst INEOS supports the positive approach to hydrocarbons of the draft Local Plan we believe that changes should be made. Having regard to practice elsewhere, we believe that there should be a single policy dealing with hydrocarbons. This should be simple and positively worded and recognise that the policy is supported by other policies in the Local Plan, which provide the details for necessary assessment of impacts. INEOS' suggested revised policy is as follows: Oil and Gas Development Exploration 1. Proposals for hydrocarbon exploration will be supported provided they do not give rise to any unacceptable impacts on the environment and residential amenity. Appraisal 2. Where hydrocarbons are discovered, proposals to appraise, drill and test the resource will be permitted provided that they are consistent with an overall scheme for the appraisal and delineation of the resource and do not give rise to any significant unacceptable impacts on the environment and residential amenity. Extraction 3. Proposals for the extraction of hydrocarbons will be supported provided they are consistent with an overall scheme for enabling the full development of the resource and do not give rise to significant unacceptable impacts on the environment and residential amenity. 4. Where proposals for hydrocarbon development coincide with areas containing other underground mineral resources evidence must be provided to demonstrate that their potential for future exploitation will not be unreasonably affected. Restoration 5. All applications for hydrocarbon development will be accompanied with details of how the site will be restored once the development is no longer required. This suggested policy is positively worded. It notes that the main concerns are with two matters: the site and residual amenity but as there is already policy dealing with such impacts, each containing assessment criteria, the hydrocarbon development policy of the plan does not need to list these considerations in its policy. The supporting text should provide background and justification, which links to the National Planning Policy Framework and other Government policies, and the PEDLs are mapped and safeguarded. This approach to policy wording will ensure that the policy is in accordance with Government Guidance, in particular the WMS of May 2018 and May 2019 and NPPF. In support of this policy approach, we suggest that the following supporting text should also be included within the Local Plan: The UK Government's energy policies seek to encourage the use of natural resources indigenous to the UK as part of achieving self-sufficiency in energy production and increasing security of energy and gas supplies. On-shore hydrocarbon extraction is comprehensively regulated. The Department of Energy and Climate Change has awarded a Petroleum, Exploration and Development Licence (PEDL) for an area within the Council’s area. Onshore hydrocarbons provide an opportunity to extract a nationally important natural energy resource without the environmental impact normally associated with minerals extraction. The extraction of CBM and shale gas will be incremental and involve more than one exploration and production site. Due to advanced drilling techniques, these sites can be up to 1km apart. Exploration and development rights granted through a PEDL create land use rights across the licence area, subject to obtaining necessary site specific consents. Safeguarding is important because rights create a land use consideration that may be a material factor in assessing other land use proposals in the area. It is a potential land use consideration that others using the planning service need to take into account. The PEDL licence does not create automatic development rights and the effects may not apply equally across
Summary:

the Local Plan should address the full range of onshore hydrocarbon extraction including:
- Conventional onshore oil and gas development.
- Extraction of petroleum or hydrocarbon oils and gases by drilling and pumping.
- Capture of methane that has accumulated in mines.
- Coal bed methane and gas derived from shale reservoirs.

Suggested Revisions to Policy 65

Whilst INEOS supports the positive approach to hydrocarbons of the draft Local Plan we believe that changes should be made. Having regard to practice elsewhere, we believe that there should be a single policy dealing with hydrocarbons. This should be simple and positively worded and recognise that the policy is supported by other policies in the Local Plan, which provide the details for necessary assessment of impacts. INEOS' suggested revised policy is as follows:

Oil and Gas Development

Exploration 1. Proposals for hydrocarbon exploration will be supported provided they do not give rise to any unacceptable impacts on the environment and residential amenity.

Appraisal 2. Where hydrocarbons are discovered, proposals to appraise, drill and test the resource will be permitted provided that they are consistent with an overall scheme for the appraisal and delineation of the resource and do not give rise to any significant unacceptable impacts on the environment and residential amenity.

Extraction 3. Proposals for the extraction of hydrocarbons will be supported provided they are consistent with an overall scheme for enabling the full development of the resource and do not give rise to significant unacceptable impacts on the environment and residential amenity.

4. Where proposals for hydrocarbon development coincide with areas containing other underground mineral resources evidence must be provided to demonstrate that their potential for future exploitation will not be unreasonably affected.

Restoration 5. All applications for hydrocarbon development will be accompanied with details of how the site will be restored once the development is no longer required.

Response:

Policy 65 Local Plan is not required to repeat national policy or guidance. NPPG paragraphs 091 to 131 comprehensively covers the requirements for shale gas and hydrocarbons and should not be repeated in the Local Plan. Paragraph 106 identifies what the Local Plans should include.

Petroleum Licence Areas on their policies maps and criteria-based policies. This has been done. The local plan should be read as a whole and contains criteria based policies against which applications can be determined. As an example policies in the chapters on green infrastructure, historic environment and health and wellbeing will be used to determine applications. As will national policy and guidance. The relevant criteria based policies can be used at different stages of an application process.
Comment:
We are supportive of the changes made since the draft of Policy 65 including changes to the supporting text, which recognises the need to align with national policy and guidance, namely NPPF Paragraphs 209 - 211, and PPG Paragraphs 106 and 107. We are also pleased to see the inclusion of a policies map that identifies the location of granted PEDLs and permitted hydrocarbon sites, as outlined in explanation sections 14.70 and 14.71. It would be beneficial to expand the explanation text in 14.73 to cover the role of the other regulators, such that there is clarity on the issues that each regulator addresses outside of the planning system. This would help to minimise any confusion regarding the role of other regulators. With respect to the specific wording of Policy 65, there would be benefit in expanding the policy text to include the 3 distinct phases of hydrocarbon development (Exploration, Appraisal, and Production) to ensure consistency with NPPF Paragraph 209 (b). It is important that the other policies (and their associated criteria) of the local plan are able to be applied proportionately against the relevant hydrocarbon development stage, as the planning considerations associated with each stage tend to vary significantly, both in terms of scale and duration. The final part of paragraph 2 of Policy 65 should be amended, primarily to replace the word ‘determined’ with ‘supported’ so that it reads "Applications for the exploration, appraisal and production of onshore gas and oil in licenced areas will be supported, where a proposed development is in line with National Policy, Guidance and relevant policies within the Local Plan."

Summary:
pleased at inclusion of a policies map that identifying granted PEDLs and permitted hydrocarbon sites in paragraphs 14.70 and 14.71. beneficial to expand the explanation text in 14.73 to cover the role of the other regulators. benefit in expanding the policy text to include the 3 distinct phases of hydrocarbon development (Exploration, Appraisal, and Production) to ensure consistency with NPPF Paragraph 209 (b). Want other policies in the Local Plan applied proportionally. Amend Policy 65 to replace the word ‘determined’ with ‘supported’

Response:
pleased at inclusion of a policies map that identifying granted PEDLs and permitted hydrocarbon sites in paragraphs 14.70 and 14.71 - Comment noted. beneficial to expand the explanation text in 14.73 to cover the role of the other regulators - The Local Plan is not required to repeat national policy and guidance. Regulators are identified in NPPG paragraphs 014, with 110 and 111 specifically relating to hydrocarbons benefit in expanding the policy text to include the 3 distinct phases of hydrocarbon development (Exploration, Appraisal, and Production) to ensure consistency with NPPF Paragraph 209 (b) - The Local Plan is not required to repeat national policy and guidance. See NPPG paragraphs 092 to 103.  Want other policies in the Local Plan applied proportionally. The Local Plan is a planning tool to be applied fairly and proportionally by development management officers Amend Policy 65 to replace the word ‘determined’ with ‘supported’ - There is no political support for unconventional hydrocarbon extraction in Doncaster and as such applications will be determined fairly and proportionally by development management officers in line with national policy and guidance.
There are hydrocarbon energy minerals other than gas and oil, such as coal. Given the policy is specific to hydrocarbons, the policy may benefit from being titled as such, particularly given the emerging technology in coal gasification and the presence of deep coal deposits in the Plan area referred to in Paragraph 14.34 and identified and referred to as shallow coal deposits on Figure 14 - Minerals Resources Key Diagram; this would be consistent with the authority’s ‘Hydrocarbon Evidence Base Update’ document (August 2018) and similar policies in other mineral planning authority plans which provide for hydrocarbon reserves. It is noted that there are no mineral policies, general or otherwise, against which proposals relating to the winning and working of coal in whatever guise could be assessed and no reference to such, other than its presence, is referred to in any of the supporting text to the policies. This is considered to be a short coming of the Plan which you may wish to address. IGas welcomes the proposed changes to Policy 65. IGas is pleased to see the inclusion of PEDLs and permitted hydrocarbon sites on the Maps policy as referred to in the first part of the policy in accordance with Government guidance. However, the second part of the policy now simply requires applications for the exploration, appraisal and development (including production) of on-shore gas and oil in licenced areas to be determined in line with National Policy, Guidance and relevant policies within the Local Plan. It is not clear which National Policy or guidance is being referred to. If, as assumed, it refers to the National Planning Policy Framework (note 2 - 2https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf) and Planning Practice Guidance - Minerals (note 3 - https://www.gov.uk/guidance/minerals), perhaps these should be specified. The NPPF is quite clear that local planning authorities must clearly distinguish between, and plan positively for the three phases of development (exploration, appraisal and production) whilst ensuring appropriate monitoring and site restoration is provided for. Policy 65 in its current form fails to do this. If the Policy is to be retained in its current form, IGas is of the view that the term ‘determined’ should be replaced with ‘supported’. The supporting explanation to the Policy acknowledges that national planning policy requires mineral local plans should include policies for mineral extraction and that applications for hydrocarbons will be determined in line with national policy, planning practice guidance and relevant policies of the local plan. However, the Plan does not support the principle of hydrocarbon development, identify the different stages of hydrocarbon exploration, appraisal and production or include criterion against which proposals will be assessed; consequently it is considered that the Plan falls short of the requirements of the NPPF and the Councils oil and gas ‘Hydrocarbon Evidence Base Update’ document (August 2019) (see below). The supporting explanation requires applications which include or may include hydraulic fracturing to be the subject of an EIA. This was not a requirement of the earlier draft Policy and it is questionable whether it should be a requirement at all. The need for an EIA is set out in the Town and Country Planning (Environmental Impact Assessment Regulations) 2017 (the Regulations) (Note 4 - http://www.legislation.gov.uk/uksi/2017/571/schedule/1/made). Proposals for hydrocarbon exploration and appraisal do not fall within Schedule 1 of the Regulations. Production may fall within Schedule 1 subject to the specific thresholds being met or exceeded. Proposals for hydrocarbon exploration and appraisal may fall within Schedule 2 of the Regulations subject to the exceedance of the specified thresholds and criteria. This would be determined by the nature and scale of a proposed development and which could be the subject of a screening and or scoping request. It is therefore considered inappropriate for the supporting explanation to require applications which include (or may include) proposals for hydraulic fracturing to be required to produce an EIA, particularly in the absence of any reference to such in the policy. Irrespective, the industry has committed to undertake site specific EIAs, and for shale sites, Environmental Risk Assessments below). The supporting explanation requires applications which include or may include hydraulic fracturing to be the subject of an EIA. This was not a requirement of the earlier draft Policy and it is questionable whether it should be a requirement at all. The need for an EIA is set out in the Town and Country Planning (Environmental Impact Assessment Regulations) 2017 (the Regulations) (Note 4 - http://www.legislation.gov.uk/uksi/2017/571/schedule/1/made). Proposals for hydrocarbon exploration and appraisal do not fall within Schedule 1 of the Regulations. Production may fall within Schedule 1 subject to the specific thresholds being met or exceeded. Proposals for hydrocarbon exploration and appraisal may fall within Schedule 2 of the Regulations subject to the exceedance of the specified thresholds and criteria. This would be determined by the nature and scale of a proposed development and which could be the subject of a screening and or scoping request. It is therefore considered inappropriate for the supporting explanation to require applications which include (or may include) proposals for hydraulic fracturing to be required to produce an EIA, particularly in the absence of any reference to such in the policy. Irrespective, the industry has committed to undertake site specific EIAs, and for shale sites, Environmental Risk Assessments, in consultation with local communities and the statutory consultees. Where there is a proposal to stimulate the flow of hydrocarbons through the use of high-volume hydraulic fracturing, there is a commitment to carry out an EIA irrespective of the requirements of the EIA Regulations (Note 5 - http://www.ukoog.org.uk/regulation/environment). However, it is considered inappropriate for this to be a requirement of the Plan and would invite the Council to carefully consider whether the inclusion of such makes the plan sound.

Summary:

Policy 65. There are hydrocarbon energy minerals other than gas and oil, such as coal. No mineral policies for coal. Presence referred to in supporting text. This should be addressed. Pleased to see inclusion of PEDLs, but second part of the Policy requires applications for the exploration, appraisal and development (including production) of on-shore gas and oil in licenced areas to be determined in line with National Policy, Guidance and relevant policies within the Local Plan. Policy 65 is not positively prepared, does not distinguish between and plan positively for three phases of development (exploration, appraisal and production) and does not refer to all hydrocarbons. If policy retained in current form the term 'determined' should be replaced with 'supported'. The Plan does not support the principle of hydrocarbon development, identify the different stages of hydrocarbon exploration, appraisal and production or include criterion against which proposals will be assessed. does not reflect EIA regulations and does not reflect roles of regulators. Proposals for hydrocarbon exploration and appraisal do not fall into schedule 1 of the regulations. Production may fall in to schedule 1 subject to thresholds being met or exceeded. EIA requirement determined by a screening scoping request. (Industry is committed to undertake site specific EIAs)
Policy 65 comment noted. No changes proposed to policy 65. The Local Plan is not required to repeat national policy and guidance. See NPPG paragraphs 092 to 103. It is not politically acceptable to use the word ‘support’ in the policy 65. A policy is provided (as required), which defers directly to national policy and guidance, which is positive in nature.

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<td>Comment:</td>
<td>The ‘hydrocarbon evidence base’ document 2018, states, ‘Policies will be developed in the Local Plan which will comply with the national policy, guidance and legislation; this statement was supported. It is noted the evidence base has been updated (June 2019). Unfortunately the Council's August 2018 evidence base appears to have been removed from your website. It is assumed there has been little, if any, changes other than those to the Summary/Conclusion. The previous commitment appears to have changed, now referring to the revised policy which ‘directs applicants to the national policy, guidance and legislation, and relevant policies within the Local Plan’. This appears to be in conflict with earlier parts of the evidence base which sets out the national policy and legislation (Section 2) and which requires: 2.1 The National Planning Policy Framework (NPPF) sets out the minerals planning policy for oil, gas and coal exploration and extraction. Mineral Planning Authorities are required to: when planning for on-shore oil and gas development, clearly distinguish between, and plan positively for the three phases of development (exploration, appraisal and production), whilst ensuring appropriate monitoring and site restoration is provided for ensure appropriate monitoring and restoration is provided for. 2.2 ?? criteria-based policies for each of the exploration, appraisal and production phases of hydrocarbon extraction should set clear guidance and criteria. And Section 3: 3.3 When updating the Local Plan the Planning Authority is required to identify Petroleum Exploration &amp; Development Licences (PEDL) and existing hydrocarbon extraction sites on the Local Plan policies map, and provide for criteria based policies for each phase of hydrocarbon extraction. There similarly appears to be some discrepancy between the revised summary and conclusion and the Policy. Whilst the summary ‘directs’ applicants Policy states ‘Applications for the exploration, appraisal and development (including production) of on-shore gas and oil in licenced areas will be determined in line with National Policy, Guidance and relevant policies within the Local Plan’ i.e., it is the policy and guidance against which an application will be assessed, not against which an applicant must prepare an application. Irrespective of any minor change to the wording that could address this, it is considered that the evidence base, as updated, has still not been used to fully inform draft Policy 65 for the reasons set out above. IGas previously suggested it may assist to look at policies and supporting explanations that have been through examination, found sound and subsequently adopted. Given the above, this suggestion is maintained. As stated in previous representations, it would be helpful to set out the roles of other regulating bodies, as outlined in section 3 of the Hydrocarbon Evidence Base as updated in either the policy or supporting explanation so it is clear what the role of the planning authority is in the context of surface development for onshore oil and gas; this would accord with national planning guidance and assist in making the plan sound.</td>
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Summary:
Policy 65 Hydrocarbon Evidence Base update. Evidence base states policies will be developed in the local plan that comply with national policy guidance and legislation, but previous policy commitment has changed.

Response:
Comment noted. It is not politically acceptable to use the word ‘support’ in the policy. The policy defers directly to national policy and guidance, which is positive in nature. Applications will be determined using criteria based policies in the local plan and national policy and guidance as required. PEDLs are shown as required.
Comment:
The Planning service team has looked at Policies relation to Minerals and Waste and have the following comments. The policy is acceptable in principle, but notice it has changed significantly since the informal consultation on Draft policies and sites and now only relies on national policy and regulations without the local focus of the previous draft policy.

Summary:

Response:
Comment Noted.
<table>
<thead>
<tr>
<th>Tests of Soundness:</th>
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**Comment:**

While much of the Local Plan appears to meet most of the requirements of 'soundness', in so far as the JRP can judge on the evidence provided, it can only be effective if there are robust monitoring and enforcement measures.

**Summary:**

While much of the Local Plan appears to meet most of the requirements of 'soundness', in so far as the JRP can judge on the evidence provided, it can only be effective if there are robust monitoring and enforcement measures.

**Response:**

Noted and agree - Chapter 15 and the associated Appendix sets out extensive monitoring indicators to ensure the plan is working as envisaged. Planning Enforcement is also a function of the council but not directly related to the local plan.
Strata Homes is concerned with aspects of Policy 66. The Framework is, however, clear that the derivation of developer contributions must not only take account of need but also viability. Paragraph 34 of the Framework (2019) established 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. Appendices 3-10 of the Viability Report show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support provision of 15% affordable housing. In some circumstances some site typologies in the medium value areas would also be unviable. The whole plan viability report concluded that generally schemes in high and medium value areas were demonstrated to be viable. However, it should be noted that this did not consider the cumulative/in combination impact of all of the policy requirements and assessed other Plan requirements against the delivery of 15% affordable housing and not 23% affordable housing as sought by Policy 8. 12.5. Strata Homes is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. 12.6. 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. 12.7. Strata Homes are concerned that the policy requirements of the Plan are not justified and are not consistent with the Framework. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. Proposed Change 12.9. To overcome the objection and address soundness matters, the Council should: - Review and update the viability assessment and modify the policy requirements to reflect the findings and representations contained herein.

Summary:

Strata Homes is concerned with aspects of Policy 66. Strata Homes is supportive of the need for developer contributions. The Framework is, however, clear that the derivation of developer contributions must not only take account of need but also viability. Appendices 3-10 of the Viability Report show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support provision of 15% affordable housing. In some circumstances some site typologies in the medium value areas would also be unviable. The whole plan viability report concluded that generally schemes in high and medium value areas were demonstrated to be viable. However, it should be noted that this did not consider the cumulative/in combination impact of all of the policy requirements and assessed other Plan requirements against the delivery of 15% affordable housing and not 23% affordable housing as sought by Policy 8. Strata Homes is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. 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. To overcome the objection and address soundness matters, the Council should: - Review and update the viability assessment and modify the policy requirements to reflect the findings and representations contained herein.

Response:

The viability testing considers a number of different viability scenarios. This includes the `base? appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific `low-cost? developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in.
3.53 Policy 66 states the following regarding developer contributions: It is important that new proposals are planned in step with the necessary supporting infrastructure, and can make appropriate contributions towards new infrastructure as required, in order to deliver sustainable development. However, developments should not be subject to such a scale of developer contributions or policy requirements that development viability is put at risk. To help ensure this balance is achieved, proposals will be expected to accord with the following: a) Where necessary, directly related to the development, and fair and reasonable in scale and kind, developer contributions will be sought to mitigate the impacts of development through: 1. direct provision on site (e.g. for on-site affordable housing, education facilities, biodiversity net gain, open space, or sustainable drainage schemes); 2. provision off site, to ensure the development can be delivered in line with other policy objectives, and to a safe and satisfactory standard (such as off-site affordable housing, education facilities, biodiversity net gain, flood mitigation, or highways improvements); and 3. contributions towards softer interventions to ensure the benefits of the development are maximised by local communities (such as skills and training programmes including local labour agreements). b) Where infrastructure is to be provided either on or off site, provision for its long-term maintenance will be required (which may include its adoption either by the Council or a third party, subject to the provision of appropriate maintenance funding from the developer). c) To address developer requirements as a whole, where development proposals on a large composite or naturally defined area are sub divided into multiple applications (or phases) over time, planning applications which form part of a more substantial proposed development, on the same or adjoining land will be treated as one application for the whole development. 3.54 We object to the current wording of Policy 66. Recommendation 3.55 The specific developer contribution requirements need to be defined either in policy, a supplementary planning document or a CIL document for clarity and to ensure deliverability and soundness of the plan. Justification 3.56 Policy 66 is inadequately clear and ineffective, and therefore unsound.
2.54 Policy 66 states the following regarding developer contributions: It is important that new proposals are planned in step with the necessary supporting infrastructure, and can make appropriate contributions towards new infrastructure as required, in order to deliver sustainable development. However, developments should not be subject to such a scale of developer contributions or policy requirements that development viability is put at risk. To help ensure this balance is achieved, proposals will be expected to accord with the following: a) Where necessary, directly related to the development, and fair and reasonable in scale and kind, developer contributions will be sought to mitigate the impacts of development through: 1. direct provision on site (e.g. for on-site affordable housing, education facilities, biodiversity net gain, open space, or sustainable drainage schemes); 2. provision off site, to ensure the development can be delivered in line with other policy objectives, and to a safe and satisfactory standard (such as off-site affordable housing, education facilities, biodiversity net gain, flood mitigation, or highways improvements); and 3. contributions towards softer interventions to ensure the benefits of the development are maximised by local communities (such as skills and training programmes including local labour agreements). b) Where infrastructure is to be provided either on or off site, provision for its long-term maintenance will be required (which may include its adoption either by the Council or a third party, subject to the provision of appropriate maintenance funding from the developer). c) To address developer requirements as a whole, where development proposals on a large composite or naturally defined area are sub divided into multiple applications (or phases) over time, planning applications which form part of a more substantial proposed development, on the same or adjoining land will be treated as one application for the whole development. 2.55 We object to the current wording of Policy 66. Recommendation 2.56 The specific developer contribution requirements need to be defined either in policy, a supplementary planning document or a CIL document for clarity and to ensure deliverability and soundness of the plan. Justification 2.57 Policy 66 is inadequately clear and ineffective, and therefore unsound.
**Reason:** We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

**Area:** Chapter 15: Implementation & Monitoring

**Policy:** Policy 66: Developer Contributions

**Comment:**

Part C of this policy requires clarification to ensure that where the Council is considering an application for part of a site, that part of the site will not face planning obligations over and above what is necessary, proportionate and reasonably related in scale and in kind to that part of the site.

**Summary:**

Part C of Policy 66 requires clarification to ensure that where the Council is considering an application for part of a site, that part of the site will not face planning obligations over and above what is necessary, proportionate and reasonably related in scale and in kind to that part of the site.

**Response:**

Part A of the policy makes clear that any contributions must be fair and reasonable in scale and kind.
Comment:

2.86 Policy 66 states the following regarding developer contributions: "It is important that new proposals are planned in step with the necessary supporting infrastructure, and can make appropriate contributions towards new infrastructure as required, in order to deliver sustainable development. However, developments should not be subject to such a scale of developer contributions or policy requirements that development viability is put at risk. To help ensure this balance is achieved, proposals will be expected to accord with the following: a) Where necessary, directly related to the development, and fair and reasonable in scale and kind, developer contributions will be sought to mitigate the impacts of development through: 1. direct provision on site (e.g. for on-site affordable housing, education facilities, biodiversity net gain, open space, or sustainable drainage schemes); 2. provision off site, to ensure the development can be delivered in line with other policy objectives, and to a safe and satisfactory standard (such as off-site affordable housing, education facilities, biodiversity net gain, flood mitigation, or highways improvements); and 3. contributions towards softer interventions to ensure the benefits of the development are maximised by local communities (such as skills and training programmes including local labour agreements). b) Where infrastructure is to be provided either on or off site, provision for its long-term maintenance will be required (which may include its adoption either by the Council or a third party, subject to the provision of appropriate maintenance funding from the developer). c) To address developer requirements as a whole, where development proposals on a large composite or naturally defined area are subdivided into multiple applications (or phases) over time, planning applications which form part of a more substantial proposed development, on the same or adjoining land will be treated as one application for the whole development." 2.87 We object to the current wording of Policy 66. Recommendation 2.88 The specific developer contribution requirements need to be defined either in policy, a supplementary planning document or a CIL document for clarity and to ensure deliverability and soundness of the plan. Justification 2.89 Policy 66 is inadequately clear and ineffective, and therefore unsound.

Summary:

Policy 66. specific developer contributions need to be defined either in policy, a supplementary planning document or a CIL document for clarity and to ensure deliverability and soundness of the plan. Policy 66 is inadequately clear and ineffective, and therefore unsound.

Response:

Further details of contributions are set out in other Local Plan policies, for example Policy 29 sets out the detail of open space in new developments. Should the Council look to introduce CIL in the future then this process itself will have to make clear what is covered by CIL and what will still be negotiated via S106 as set out in the explanatory text to the policy at para 15.4
### Comment Ref:
C/Policy 66/03506/1/012

### Name:
Spawforth Associates

### Organisation:
Spawforth Associates

### Representing:
Mr Paul Burtwistle

### Attend Examination:
Attend Hearing

### Area:
Chapter 15: Implementation & Monitoring

### Policy:
Policy 66: Developer Contributions

<table>
<thead>
<tr>
<th>Tests of Soundness</th>
<th>Positively prepared</th>
<th>Effective</th>
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### Comment:

12.1. H. Burtwistle & Son is concerned with aspects of Policy 66. Test of Soundness 12.2. H. Burtwistle & Son considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy

Justification 12.3. H. Burtwistle & Son is supportive of the need for developer contributions. The Framework is, however, clear that the derivation of developer contributions must not only take account of need but also viability. Paragraph 34 of the Framework (2019) established 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. 12.4. Appendices 3-10 of the Viability Report show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support provision of 15% affordable housing. In some circumstances some site typologies in the medium value areas would also be unviable. The whole plan viability report concluded that generally schemes in high and medium value areas were demonstrated to be viable. However, it should be noted that this did not consider the cumulative/in combination impact of all of the policy requirements and assessed other Plan requirements against the delivery of 15% affordable housing and not 23% affordable housing as sought by Policy 8. 12.5. H. Burtwistle & Son is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. 12.6. 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. 12.7. H. Burtwistle & Son are concerned that the policy requirements of the Plan are not justified and are not consistent with the Framework. 12.8. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. Proposed Change 12.9. To overcome the objection and address soundness matters, the Council should: - Review and update the viability assessment and modify the policy requirements to reflect the findings and representations contained herein.

### Summary:

Policy 66 - Developer Contributions. 1. Should not impact on viability. 2. Need for viability assessment of schemes on a regular basis could undermine deliverability. 3. Review and update viability assessment and then modify policy requirements accordingly.

### Response:

The viability testing considers a number of different viability scenarios. This includes the 'base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost' developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in.
Summary:
Concerned with aspects of Policy 66. Concerned that with all the policy requirements the High Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. 12.6. 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. 12.7. H. Burtwistle & Son are concerned that the policy requirements of the Plan are not justified and are not consistent with the Framework. 12.8. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. Proposed Change 12.9. To overcome the objection and address soundness matters, the Council should: - Review and update the viability assessment and modify the policy requirements to reflect the findings and representations contained herein.

Response:
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Earlier iterations of this policy identified that developer contributions will be sought for off-site highway works to mitigate the impacts of the development and that pooled contributions for schemes (necessitated through the cumulative impact of a number of developments) would be collected. However, point D) has now been removed in the Local Plan Publication Version which allowed for pooled contributions to be taken from multiple developments. **PROPOSED CHANGE** Further discussions will need to be held between Highways England and Doncaster Council, as should the cumulative impact assessment reveal that significant improvements will be required at the SRN, there needs to be mechanisms put in place where these could be contributed to by multiple developers.

**Summary:**

The Local Plan has removed a part of earlier iterations which allowed for pooled contributions from multiple developers. Proposed change: should the cumulative impact assessment reveal that significant improvements will be required at the SRN, mechanisms need to be in place that could be contributed to by multiple developers. Further discussion between Highways England and DMBC will need to be held.

**Response:**

Noted - there is ongoing work with Highways England looking at the cumulative effects of Local Plan growth as part of the modelling and will feed into the Infrastructure Delivery Plan.
12.1. Framecourt Homes is concerned with aspects of Policy 66. Test of Soundness 12.2. Framecourt Homes considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy

Justification 12.3. Framecourt Homes is supportive of the need for developer contributions. The Framework is, however, clear that the derivation of developer contributions must not only account of need but also viability. Paragraph 34 of the Framework (2019) established 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. 12.4. Appendices 3-10 of the Viability Report show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support provision of 15% affordable housing. In some circumstances some site typologies in the medium value areas would also be unviable. The whole plan viability report concluded that generally schemes in high and medium value areas were demonstrated to be viable. However, it should be noted that this did not consider the cumulative/in combination impact of all of the policy requirements and assessed other Plan requirements against the delivery of 15% affordable housing and not 23% affordable housing as sought by Policy 8. 12.5. Framecourt Homes is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. 12.6. The Council should be mindful that it is unrealistic to negotiate every site on a one by one basis because the base-line aspersion 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. 12.7. Framecourt Homes are concerned that the policy requirements of the Plan are not justified and are not consistent with the Framework. 12.8. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. Proposed Change 12.9. To overcome the objection and address soundness matters, the Council should: - Review and update the viability assessment and modify the policy requirements to reflect the findings and representations contained herein.

Summary:

Concerned with aspects of Policy 66. Consider that the plan is unsound. Support the need for developer contributions, but the framework is clear that these should account for viability as well as need. There should not be such a burden as would threaten deliverability. Appendices 3 - 10 show a number of viability issues for a number of sites. Schemes in low value areas may not be able to support 15% affordable housing, and in some cases typologies in medium areas are also unviable. Although higher value areas are viable, this did not consider cumulative / in combination impact of all the policy requirements and assessed this against 15% and not 23% requirement as sought by Policy 8. Concerned that the policy requirements will undermine housing delivery through a need for viability assessments of schemes on a regular basis. A significant proportion of sites will not be able to achieve affordable housing due to viability matters. The government are keen to avoid a situation of numerous viability assessments being submitted. This could impact the delivery of housing targets. Site negotiations should be should be occasional rather than routine. The policy is unjustified and not consistent with the framework. To overcome the objection and address soundness matters, the Council should: - Review and update the viability assessment and modify the policy requirements to reflect the findings and representations contained herein.

Response:

The viability testing considers a number of different viability scenarios. This includes the 'base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost' developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in.
13.1. Avant Homes is concerned with aspects of Policy 66. Test of Soundness 13.2. Avant Homes considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification

13.3. Avant Homes is supportive of the need for developer contributions. The Framework is, however, clear that the derivation of developer contributions must not only take account of need but also viability. Paragraph 34 of the Framework (2019) established 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. 13.4. Appendices 3-10 of the Viability Report show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support provision of 15% affordable housing. In some circumstances some site typologies in the medium value areas would also be unviable. The whole plan viability report concluded that generally schemes in high and medium value areas were demonstrated to be viable. However, it should be noted that this did not consider the cumulative/in combination impact of all of the policy requirements and assessed other Plan requirements against the delivery of 15% affordable housing and not 23% affordable housing as sought by Policy 8. 13.5. Avant Homes is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. 13.6. 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. 13.7. Avant Homes are concerned that the policy requirements of the Plan are not justified and are not consistent with the Framework. 13.8. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. Proposed Change 13.9. To overcome the objection and address soundness matters, the Council should: - Review and update the viability assessment and modify the policy requirements to reflect the findings and representations contained herein.

Summary: Supportive of need for developer contributions. Appendices 3 - 10 of the viability report show viability issues for a number of sites. It shows that the schemes in the low value areas were not able to support provision of 15% affordable housing. In some circumstances some site typologies in the medium value areas would also be unviable. The whole plan viability report concluded that generally schemes in high and medium value areas were demonstrated to be viable. However, it should be noted that this did not consider the cumulative/in combination impact of all of the policy requirements and assessed other Plan requirements against the delivery of 15% affordable housing and not 23% affordable housing as sought by Policy 8. Concerned that policy requirements could undermine the delivery of sites through viability assessments being regularly needed. The viability assessment shows a proportion of sites will not be able to achieve affordable housing due to viability matters. Council should be aware of the impact that viability assessments and subsequent obligation negotiations can have on development delivery, which could impact on the delivery of housing. The Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. Be mindful it is unrealistic to negotiate every site on a one by one basis because the base line policy aspiration is set too high. Negotiations should be occasional rather than routine. Policy requirements are not justified or consistent with the framework. Plan is not sound. Proposed changes: review and update the viability assessment and modify the policy requirements to reflect the findings and representations contained herein.

Response: The viability testing considers a number of different viability scenarios. This includes the 'base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost' developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in.
Tests of Soundness: Positively prepared Effective Justified Consistent with national

Comment:
13.1. Avant Homes is concerned with aspects of Policy 66. Test of Soundness 13.2. Avant Homes considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification

13.3. Avant Homes is supportive of the need for developer contributions. The Framework is, however, clear that the derivation of developer contributions must not only take account of need but also viability. Paragraph 34 of the Framework (2019) established 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. 13.4. Appendices 3-10 of the Viability Report show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support provision of 15% affordable housing. In some circumstances some site typologies in the medium value areas would also be unviable. The whole plan viability report concluded that generally schemes in high and medium value areas were demonstrated to be viable. However, it should be noted that this did not consider the cumulative/in combination impact of all of the policy requirements and assessed other Plan requirements against the delivery of 15% affordable housing and not 23% affordable housing as sought by Policy 8. 13.5. Avant Homes is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. 13.6. 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. 13.7. Avant Homes are concerned that the policy requirements of the Plan are not justified and are not consistent with the Framework. 13.8. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. Proposed Change 13.9. To overcome the objection and address soundness matters, the Council should: - Review and update the viability assessment and modify the policy requirements to reflect the findings and representations contained herein.

Summary:
Supportive of need for developer contributions. Appendices 3 - 10 of the viability report show viability issues for a number of sites. It shows that the schemes in the low value areas were not able to support provision of 15% affordable housing. In some circumstances some site typologies in the medium value areas would also be unviable. The whole plan viability report concluded that generally schemes in high and medium value areas were demonstrated to be viable. However, it should be noted that this did not consider the cumulative/in combination impact of all of the policy requirements and assessed other Plan requirements against the delivery of 15% affordable housing and not 23% affordable housing as sought by Policy 8. Concerned that policy requirements could undermine the delivery of sites through viability assessments being regularly needed. The viability assessment shows a proportion of sites will not be able to achieve affordable housing due to viability matters. Council should be aware of the impact that viability assessments and subsequent obligation negotiations can have on development delivery, which could impact on the delivery of housing. The Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. Be mindful it is unrealistic to negotiate every site on a one by one basis because the base line policy aspiration is set too high. Negotiations should be occasional rather than routine. Policy requirements are not justified or consistent with the framework. Plan is not sound. Proposed changes: review and update the viability assessment and modify the policy requirements to reflect the findings and representations contained herein.

Response:
The viability testing considers a number of different viability scenarios. This includes the 'base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost' developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in.
### Test of Soundness

13.1. Avant Homes is concerned with aspects of Policy 66. Test of Soundness 13.2. Avant Homes considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification

13.3. Avant Homes is supportive of the need for developer contributions. The Framework is, however, clear that the derivation of developer contributions must not only take account of need but also viability. Paragraph 34 of the Framework (2019) established 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. 13.4. Appendices 3-10 of the Viability Report show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support provision of 15% affordable housing. In some circumstances some site typologies in the medium value areas would also be unviable. The whole plan viability report concluded that generally schemes in high and medium value areas were demonstrated to be viable. However, it should be noted that this did not consider the cumulative/in combination impact of all of the policy requirements and assessed other Plan requirements against the delivery of 15% affordable housing and not 23% affordable housing as sought by Policy 8. 13.5. Avant Homes is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. 13.6. 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. 13.7. Avant Homes are concerned that the policy requirements of the Plan are not justified and are not consistent with the Framework. 13.8. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. Proposed Change 13.9. To overcome the objection and address soundness matters, the Council should: - Review and update the viability assessment and modify the policy requirements to reflect the findings and representations contained herein.

### Summary

Supportive of need for developer contributions. Appendices 3 - 10 of the viability report show viability issues for a number of sites. It shows that the schemes in the low value areas were not able to support provision of 15% affordable housing. In some circumstances some site typologies in the medium value areas would also be unviable. The whole plan viability report concluded that generally schemes in high and medium value areas were demonstrated to be viable. However, it should be noted that this did not consider the cumulative/in combination impact of all of the policy requirements and assessed other Plan requirements against the delivery of 15% affordable housing and not 23% affordable housing as sought by Policy 8. Concerned that policy requirements could undermine the delivery of sites through viability assessments being regularly needed. The viability assessment shows a proportion of sites will not be able to achieve affordable housing due to viability matters. Council should be aware of the impact that viability assessments and subsequent obligation negotiations can have on development delivery, which could impact on the delivery of housing. The Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. Be mindful it is unrealistic to negotiate every site on a one by one basis because the base line policy aspiration is set too high. Negotiations should be occasional rather than routine. Policy requirements are not justified or consistent with the framework. Plan is not sound. Proposed changes: review and update the viability assessment and modify the policy requirements to reflect the findings and representations contained herein.

### Response

The viability testing considers a number of different viability scenarios. This includes the 'base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost' developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in.
14.1. Avant Homes is concerned with aspects of Policy 66. Test of Soundness  14.2. Avant Homes considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy  Justification 14.3. Avant Homes is supportive of the need for developer contributions. The Framework is, however, clear that the derivation of developer contributions must not only take account of need but also viability. Paragraph 34 of the Framework (2019) established 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.  14.4. Appendices 3-10 of the Viability Report show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support provision of 15% affordable housing. In some circumstances some site typologies in the medium value areas would also be unviable. The whole plan viability report concluded that generally schemes in high and medium value areas were demonstrated to be viable. However, it should be noted that this did not consider the cumulative/in combination impact of all of the policy requirements and assessed other Plan requirements against the delivery of 15% affordable housing and not 23% affordable housing as sought by Policy 8.  14.5. Avant Homes is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. 14.6. 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.  14.7. Avant Homes are concerned that the policy requirements of the Plan are not justified and are not consistent with the Framework.  14.8. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. Proposed Change  14.9. To overcome the objection and address soundness matters, the Council should: - Review the viability assessment and modify policy requirements to reflect the findings and representations contained herein.

Summary:
Policy 66 - Developer Contributions. 1. Should not impact on viability. 2. Need for viability assessment of schemes on a regular basis could undermine deliverability. 3. Review and update viability assessment and then modify policy requirements accordingly.

Response:
The viability testing considers a number of different viability scenarios. This includes the ‘base’ appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific ‘low-cost’ developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in.
12.1. Priority Space is concerned with aspects of Policy 66. Test of Soundness 12.2. Priority Space considers that the Local Plan is unsound. Which test of soundness are comments about? X Positively Prepared X Effective X Justified X Consistency with National Policy Justification 12.3. Priority Space is supportive of the need for developer contributions. The Framework is, however, clear that the derivation of developer contributions must not only take account of need but also viability. Paragraph 34 of the Framework (2019) established 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. 12.4. Appendices 3-10 of the Viability Report show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support provision of 15% affordable housing. In some circumstances some site typologies in the medium value areas would also be unviable. The whole plan viability report concluded that generally schemes in high and medium value areas were demonstrated to be viable. However, it should be noted that this did not consider the cumulative/in combination impact of all of the policy requirements and assessed other Plan requirements against the delivery of 15% affordable housing and not 23% affordable housing as sought by Policy 8. 12.5. Priority Space is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. 12.6. 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. 12.7. Priority Space are concerned that the policy requirements of the Plan are not justified and are not consistent with the Framework. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. Proposed Change 12.9. To overcome the objection and address soundness matters, the Council should: Review and update the viability assessment and modify the policy requirements to reflect the findings and representations contained herein.

Summary:
Policy 66 - Developer Contributions. 1. Should not impact on viability. 2. Need for viability assessment of schemes on a regular basis could undermine deliverability. 3. Review and update viability assessment and then modify policy requirements accordingly.

Response:
The viability testing considers a number of different viability scenarios. This includes the 'base' appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific 'low-cost' developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in.
Policy 66: Developer Contributions

Review and update the viability assessment and modify the policy requirements to reflect the findings and representations contained herein.

Firsure is concerned that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification

12.1. Firsure is concerned with aspects of Policy 66. Test of Soundness 12.2. Firsure considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification

12.3. Firsure is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable.

12.4. Appendices 3-10 of the Viability Report show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support provision of 15% affordable housing. In some circumstances some site typologies in the medium value areas would also be unviable. The whole plan viability report concluded that generally schemes in high and medium value areas were demonstrated to be viable. However, it should be noted that this did not consider the cumulative/in combination impact of all of the policy requirements and assessed other Plan requirements against the delivery of 15% affordable housing and not 23% affordable housing as sought by Policy 8.

12.5. Firsure is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable.

12.6. 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.

12.7. Firsure are concerned that the policy requirements of the Plan are not justified and are not consistent with the Framework. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. Proposed Change

12.8. In some circumstances, the Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable.

12.9. To overcome the objection and address soundness matters, the Council should: Review and update the viability assessment and modify the policy requirements to reflect the findings and representations contained herein.

Summary:

Concerned with aspects of Policy 66. The Framework is clear that the derivation of developer contributions must not only take account of need but also viability. Paragraph 34 of the Framework (2019) established 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. Appendices 3-10 of the Viability Report show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support provision of 15% affordable housing. In some circumstances some site typologies in the medium value areas would also be unviable. The whole plan viability report concluded that generally schemes in high and medium value areas were demonstrated to be viable. However, it should be noted that this did not consider the cumulative/in combination impact of all of the policy requirements and assessed other Plan requirements against the delivery of 15% affordable housing and not 23% affordable housing as sought by Policy 8.

Concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable.

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.

The Council should review and update the viability assessment and modify the policy requirements to reflect the findings and representations contained herein.

Response:

The viability testing considers a number of different viability scenarios. This includes the ‘base’ appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific ‘low-cost’ developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in.
14.1. Metroland is concerned with aspects of Policy 66. Test of Soundness 14.2. Metroland considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy  Justification 14.3. Metroland is supportive of the need for developer contributions. The Framework is, however, clear that the derivation of developer contributions must not only take account of need but also viability. Paragraph 34 of the Framework (2019) established 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. 14.4. Appendices 3-10 of the Viability Report show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support provision of 15% affordable housing. In some circumstances some site typologies in the medium value areas would also be unviable. The whole plan viability report concluded that generally schemes in high and medium value areas were demonstrated to be viable. However, it should be noted that this did not consider the cumulative/in combination impact of all the policy requirements and assessed other Plan requirements against the delivery of 15% affordable housing and not 23% affordable housing as sought by Policy 8. 14.5. Metroland is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. 14.6. 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. 14.7. Metroland are concerned that the policy requirements of the Plan are not justified and are not consistent with the Framework. 14.8. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. Proposed Change 14.9. To overcome the objection and address soundness matters, the Council should: - Review the viability assessment and modify policy requirements to reflect the findings and representations contained herein.

Summary:
Policy 66 - Developer Contributions. 1. Should not impact on viability. 2. Need for viability assessment of schemes on a regular basis could undermine deliverability. 3. Review and update viability assessment and then modify policy requirements accordingly.

Response:
The viability testing considers a number of different viability scenarios. This includes the ‘base? appraisals, plus 11 different sensitivity tests. For example, one test considers a higher density rate of 40 dwellings per net Ha (Sensitivity Test 3 Pg 112), with the results showing that all medium value areas return a viable outcome. Also, there is a specific ‘low-cost? developer model (Sensitivity Test 10 Pg 119) where all urban extension schemes in low value areas return a viable outcome. There are therefore scenarios where schemes in both low and medium areas return viable outcomes. In forming conclusions rather than considering the results of one test instead a holistic approach has been adopted where all the different scenarios have been factored in.
We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Comment:
Part C of this policy requires clarification to ensure that where the Council is considering an application for part of a site, that part of the site will not face planning obligations over and above what is necessary, proportionate and reasonably related in scale and in kind to that part of the site.

Summary:
Part C of Policy 66 requires clarification to ensure that where the Council is considering an application for part of a site, that part of the site will not face planning obligations over and above what is necessary, proportionate and reasonably related in scale and in kind to that part of the site.

Response:
Part A of the policy makes clear that any contributions must be fair and reasonable in scale and kind.
Comment:

Part C of this policy requires clarification to ensure that where the Council is considering an application for part of a site, that part of the site will not face planning obligations over and above what is necessary, proportionate and reasonably related in scale and in kind to that part of the site.

Summary:

Part C of Policy 66 requires clarification to ensure that where the Council is considering an application for part of a site, that part of the site will not face planning obligations over and above what is necessary, proportionate and reasonably related in scale and in kind to that part of the site.

Response:

Part A of the policy makes clear that any contributions must be fair and reasonable in scale and kind.
Comment:

2.65 Policy 66 states the following regarding developer contributions: It is important that new proposals are planned in step with the necessary supporting infrastructure, and can make appropriate contributions towards new infrastructure as required, in order to deliver sustainable development. However, developments should not be subject to such a scale of developer contributions or policy requirements that development viability is put at risk. To help ensure this balance is achieved, proposals will be expected to accord with the following: a) Where necessary, directly related to the development, and fair and reasonable in scale and kind, developer contributions will be sought to mitigate the impacts of development through: 1. direct provision on site (e.g. for on-site affordable housing, education facilities, biodiversity net gain, open space, or sustainable drainage schemes); 2. provision off site, to ensure the development can be delivered in line with other policy objectives, and to a safe and satisfactory standard (such as off-site affordable housing, education facilities, biodiversity net gain, flood mitigation, or highways improvements); and 3. contributions towards softer interventions to ensure the benefits of the development are maximised by local communities (such as skills and training programmes including local labour agreements). b) Where infrastructure is to be provided either on or off site, provision for its long-term maintenance will be required (which may include its adoption either by the Council or a third party, subject to the provision of appropriate maintenance funding from the developer). c) To address developer requirements as a whole, where development proposals on a large composite or naturally defined area are sub divided into multiple applications (or phases) over time, planning applications which form part of a more substantial proposed development, on the same or adjoining land will be treated as one application for the whole development. 2.66 We object to the current wording of Policy 66, as it is not considered to be justified by appropriate evidence.

Recommendation 2.67 The specific developer contribution requirements need to be defined either in policy, a supplementary planning document or a CIL document for clarity and to ensure deliverability and soundness of the plan. Justification 2.68 DLP Planning reserves the right to comment further on the viability testing of the Local Plan as this will be impacted by further amendments proposed by the Council in order to ensure soundness of the Plan.

Summary:

Policy 66: Developer Contributions o the specific developer contribution requirements need to be defined either in policy, a supplementary planning document or a CIL document for clarity and to ensure deliverability and soundness of the plan.

Response:

Further details of contributions are set out in other Local Plan policies, for example Policy 29 sets out the detail of open space in new developments. Should the Council look to introduce CIL in the future then this process itself will have to make clear what is covered by CIL and what will still be negotiated via S106 as set out in the explanatory text to the policy at para 15.4
Policy 67 is not considered to be sound as it is not consistent with national policy for the following reasons: The HBF considers that 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, the HBF have significant concerns around the implementation of this policy and how frequently it will be used. 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. The HBF considers that this policy causes unnecessary uncertainty and additional risk for developers, and that such disincentivising of developers could become an impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long time periods.

Summary:
Policy 67 is not considered to be sound as it is not consistent with national policy. The HBF considers that 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, the HBF have significant concerns around the implementation of this policy and how frequently it will be used. 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. The HBF considers that this policy causes unnecessary uncertainty and additional risk for developers, and that such disincentivising of developers could become an impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long time periods.

Response:
In line with the revisions to national policy and guidance, the Council’s view is that the need for appraisals at application stage should be exceptional rather than the norm with an up-to-date local plan and policies tested for whole plan viability upfront. However, where genuine circumstances warrant an appraisal as part of an application then it is considered only best practice to allow for a future review, especially for very large developments that may build out over several years during which market conditions may change. It is also considered that this policy could apply to circumstances where economic conditions change for the worse, as was the case post 2008 when a number of applications started to be accompanied with a viability appraisal and seeking reduced/deferred/future consideration of planning obligations in the interests of development viability and delivery.
13.1. Strata Homes is concerned with aspects of Policy 67. Test of Soundness 13.2. Strata Homes considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification

13.3. Strata Homes is supportive of the need for developer contributions. The Framework is, however, clear that the derivation of developer contributions must not only take account of need but also viability. Paragraph 34 of the Framework (2018) established 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. 13.4. Appendices 3-10 of the Viability Report (2019) show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support 15% affordable housing, prior to consideration of other policy requirements. In some circumstances schemes in the medium value areas would also struggle to provide the 15 percent required by this policy, when other policy requirements were considered. It should be noted that the Policy B requirement for affordable housing is 23% for high and medium value areas.

13.5. Strata Homes is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. 13.6. 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. 13.7. Furthermore, Strata Homes considers that there may be some circumstances where this policy and the use of trigger points in Part B can be utilised to bring forward the delivery of homes. However, Strata Homes have significant concerns around the implementation of this policy and how frequently it will be used. The use of trigger points could add further burdens to any developer who will need to reproduce viability assessments.

13.8. Strata Homes are concerned that the whole plan viability does not fully consider the in combination impacts of the Plan requirements. It is also considered that Part B does not provide sufficient certainty. Strata Homes considers that the Plan is not justified and are not consistent with the Framework. 13.9. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 13.10. Strata Homes consider that with increased flexibility in the Plan requirements and review of the viability assessment the Plan can be made sound. Strata Homes will continue to work with the Council to develop appropriate modifications. Proposed Change 13.11. To overcome the objection and address soundness matters, the Council should: - Review and update the viability assessment. - Provide clarity on Part B or remove.

Summary:
09 October 2019 11:10 Strata Homes is concerned with aspects of Policy 67. Strata Homes is supportive of the need for developer contributions. The NPPF is, however, clear that the derivation of developer contributions must not only take account of need but also viability. Appendices 3-10 of the Viability Report (2019) show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support 15% affordable housing, prior to consideration of other policy requirements. In some circumstances schemes in the medium value areas would also struggle to provide the 15 percent required by this policy, when other policy requirements were considered. It should be noted that the Policy B requirement for affordable housing is 23% for high and medium value areas. Strata Homes is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. 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. Furthermore, Strata Homes considers that there may be some circumstances where this policy and the use of trigger points in Part B can be utilised to bring forward the delivery of homes. However, Strata Homes have significant concerns around the implementation of this policy and how frequently it will be used. 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. Strata Homes considers that this policy causes unnecessary uncertainty and additional risk for developers, and therefore the policy could become an impediment to the development process and
compromise the deliverability of large sites particularly those phased and implemented over long time periods. Strata Homes are concerned that the whole plan viability does not fully consider the in combination impacts of the Plan requirements. It is also considered that Part B does not provide sufficient certainty. Strata Homes considers that the Plan is not justified and are not consistent with the Framework. Strata Homes consider that with increased flexibility in the Plan requirements and review of the viability assessment the Plan can be made sound. To overcome the objection and address soundness matters, the Council should: - Review and update the viability assessment. - Provide clarity on Part B or remove.

Response:
See response to Policy 8 and/or 66 in respect to the viability testing evidence base. In respect to Part b of Policy 67, in line with the revisions to national policy and guidance, the Council's view is that the need for appraisals at application stage should be exceptional rather than the norm with an up-to-date local plan and policies tested for whole plan viability upfront. However, where genuine circumstances warrant an appraisal as part of an application then it is considered only best practice to allow for a future review, especially for very large developments that may build out over several years during which market conditions may change. It is also considered that this policy could apply to circumstances where economic conditions change for the worse, as was the case post 2008 when a number of applications started to be accompanied with a viability appraisal and seeking reduced/deferred/future consideration of planning obligations in the interests of development viability and delivery.

CUSREF: 03259  Name: JVH Town Planning Consultants
Date: 30/09/2019  Organisation: JVH Town Planning Consultants
Representing: Mr G.B. Turnbull

Comment Ref: /Policy 67/03259/3/009

Attend Examination: Attend Hearing

Area: Chapter 15: Implementation & Monitoring

Policy: Policy 67: Development Viability

Tests of Soundness: Positively prepared  Justified
Effective  Consistent with national
Legally Compliant

Comment:
Objection is made to this Policy as drafted, the requirement for 23% affordable homes in the higher value areas in the District is not justified by the evidence. It is noted in para 6.9 that the overall requirement for 209 units per annum, which is 23% of the annual housing target [believed to be the upper end of the range] does not take account of what has been committed through applications and is therefore an unreliable figure. The Plan should include a robust figure, and needs to include text that makes it clear that the affordable housing has to be viable. Viability testing on sites at this stage will be unreliable until a full suite of technical documents have assessed the site development costs and infrastructure requirements. The Plan should therefore reflect affordable housing requirements as aspirational but subject to detailed site viability. PROPOSED CHANGE 8. Amend the developer guidelines to be flexible and justified. As explained in detail above.

Summary:
Objects to policy - 23% affordable housing requirement is not justified by the evidence. 209 units/annum affordable does not take account of permissions so is an unreliable figure. The Plan should include a robust figure and the text make clear that affordable housing has to be viable. Testing sites at this stage will be unreliable until full technical studies have assessed development costs and infrastructure requirements. Should therefore reflect affordable housing requirements are aspirational but subject to detailed site viability. Proposed change - amend the developer guidelines to be flexible and justified.

Response:
See response to Policy 8 and/or 66 in respect to the viability testing evidence base.
**Reason:** We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

**Tests of Soundness:**

<table>
<thead>
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<td>It is considered that 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. 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. We consider that this policy causes unnecessary uncertainty and additional risk for developers, and that such disincentiving of developers could become an impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long time periods.</td>
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Policy 67: Development Viability

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<td>Chapter 15: Implementation &amp; Monitoring</td>
<td>Positively prepared</td>
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<td>Justified</td>
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13.1. H. Burtwistle & Son is concerned with aspects of Policy 67. Test of Soundness 13.2. H. Burtwistle & Son considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy

Comment:

13.1. H. Burtwistle & Son is concerned with aspects of Policy 67. Test of Soundness 13.2. H. Burtwistle & Son considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy

Justification 13.3. H. Burtwistle & Son is supportive of the need for developer contributions. The Framework is, however, clear that the derivation of developer contributions must not only take account of need but also viability. Paragraph 34 of the Framework (2018) established 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. 13.4. Appendices 3-10 of the Viability Report (2019) show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support 15% affordable housing, prior to consideration of other policy requirements. In some circumstances schemes in the medium value areas would also struggle to provide the 15 percent required by this policy, when other policy requirements were considered. It should be noted that the Policy 8 requirement for affordable housing is 23% for high and medium value areas. 13.5. H. Burtwistle & Son is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. 13.6. 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. 13.7. Furthermore, H. Burtwistle & Son considers that there may be some circumstances where this policy and the use of trigger points in Part B can be utilised to bring forward the delivery of homes. However, H. Burtwistle & Son have significant concerns around the implementation of this policy and how frequently it will be used. 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. H. Burtwistle & Son considers that this policy causes unnecessary uncertainty and additional risk for developers, and therefore the policy could become an impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long time periods. 13.8. H. Burtwistle & Son are concerned that the whole plan viability does not fully consider the in combination impacts of the Plan requirements. It is also considered that Part B does not provide sufficient certainty. H. Burtwistle & Son considers that the Plan is not justified and are not consistent with the Framework. 13.9. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 13.10. H. Burtwistle & Son consider that with increased flexibility in the Plan requirements and review of the viability assessment the Plan can be made sound. H. Burtwistle & Son will continue to work with the Council to develop appropriate modifications. Proposed Change 13.11. To overcome the objection and address soundness matters, the Council should: - Review and update the viability assessment. - Provide clarity on Part B or remove.

Summary:

Policy 67 - Development Viability. 1. Policy is an impediment to development and compromises deliverability. 2. Viability assessment should be reviewed and updated. 3. Provide clarity in Part B or remove trigger points - they are a burden on development.

Response:

See response to Policy 8 and/or 66 in respect to the viability testing evidence base. In respect to Part b of Policy 67, in line with the revisions to national policy and guidance, the Council's view is that the need for appraisals at application stage should be exceptional rather than the norm with an up-to-date local plan and policies tested for whole plan viability upfront. However, where genuine circumstances warrant an appraisal as part of an application then it is considered only best practice to allow for a future review, especially for very large developments that may build out over several years during which market conditions may change. It is also considered that this policy could apply to circumstances where economic conditions change for the worse, as was the case post 2008 when a number of applications started to be accompanied with a viability appraisal and seeking reduced/deferred/future consideration of planning obligations in the interests of development viability and delivery.
13.1. H. Burtwistle & Son is concerned with aspects of Policy 67. Test of Soundness 13.2. H. Burtwistle & Son considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 13.3. H. Burtwistle & Son is supportive of the need for developer contributions. The Framework is, however, clear that the derivation of developer contributions must not only take account of need but also viability. Paragraph 34 of the Framework (2018) established 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. 13.4. Appendices 3-10 of the Viability Report (2019) show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support 15% affordable housing, prior to consideration of other policy requirements. In some circumstances schemes in the medium value areas would also struggle to provide the 15 percent required by this policy, when other policy requirements were considered. It should be noted that the Policy 8 requirement for affordable housing is 23% for high and medium value areas. 13.5. H. Burtwistle & Son is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. 13.6. 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. 13.7. Furthermore, H. Burtwistle & Son considers that there may be some circumstances where this policy and the use of trigger points in Part B can be utilised to bring forward the delivery of homes. However, H. Burtwistle & Son have significant concerns around the implementation of this policy and how frequently it will be used. 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. H. Burtwistle & Son considers that this policy causes unnecessary uncertainty and additional risk for developers, and therefore the policy could become an impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long time periods. 13.8. H. Burtwistle & Son are concerned that the whole plan viability does not fully consider the in combination impacts of the Plan requirements. It is also considered that Part B does not provide sufficient certainty. H. Burtwistle & Son considers that the Plan is not justified and are not consistent with the Framework. 13.9. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 13.10. H. Burtwistle & Son consider that with increased flexibility in the Plan requirements and review of the viability assessment the Plan can be made sound. H. Burtwistle & Son will continue to work with the Council to develop appropriate modifications. Proposed Change 13.11. To overcome the objection and address soundness matters, the Council should: - Review and update the viability assessment. - Provide clarity on Part B or remove.

Summary:
Concerned with aspects of Policy 67. Concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. Concerned that the whole plan viability does not fully consider the in combination impacts of the Plan requirements. It is also considered that Part B does not provide sufficient certainty. Consider that with increased flexibility in the Plan requirements and review of the viability assessment the Plan can be made sound. To overcome the objection and address soundness matters, the Council should: - Review and update the viability assessment. - Provide clarity on Part B or remove.

Response:
See response to Policy 8 and/or 66 in respect to the viability testing evidence base. In respect to Part b of Policy 67, in line with the revisions to national policy and guidance, the Council's view is that the need for appraisals at application stage should be exceptional rather than the norm with an up-to-date local plan and policies tested for whole plan viability upfront. However, where genuine circumstances warrant an appraisal as part of an application then it is considered only best practice to allow for a future review, especially for very large developments that may build out over several years during which market conditions may change. It is also considered that this policy could apply to circumstances where economic conditions change for the worse, as was the case post 2008 when a number of applications started to be accompanied with a viability appraisal and seeking reduced/deferred/future consideration of planning obligations in the interests of development viability and delivery.
Tests of Soundness:

Comment:

2.76 Whilst we continue to welcome the pragmatic and flexible approach towards planning obligations as stated in this policy, our concerns remain regarding Part B of the Policy. As written Part B may result in the re-assessment of an agreed lower level of contribution once development commences. This will introduce unnecessary uncertainty to developers. Further information is required regarding when such re-assessment may be considered to be appropriate, and what constitutes 'suitable trigger point(s)'.

Summary:
Welcome the pragmatic and flexible approach to planning obligations, but concerns remain about Part B. As written, this may result in a re-assessment of the agreed lower level of contribution once development commences. This will introduce unnecessary uncertainty to developers. Further info required as to when such a re-assessment may be considered appropriate and what constitutes 'suitable trigger points'.

Response:
In respect to Part b of Policy 67, in line with the revisions to national policy and guidance, the Council's view is that the need for appraisals at application stage should be exceptional rather than the norm with an up-to-date local plan and policies tested for whole plan viability upfront. However, where genuine circumstances warrant an appraisal as part of an application then it is considered only best practice to allow for a future review, especially for very large developments that may build out over several years during which market conditions may change. It is also considered that this policy could apply to circumstances where economic conditions change for the worse, as was the case post 2008 when a number of applications started to be accompanied with a viability appraisal and seeking reduced/deferred/future consideration of planning obligations in the interests of development viability and delivery.
2.36 Whilst we continue to welcome the pragmatic and flexible approach towards planning obligations as stated in this policy, our concerns remain regarding Part B of the Policy. As written Part B may result in the re-assessment of an agreed lower level of contribution once development commences. This will introduce unnecessary uncertainty to developers. Further information is required regarding when such re-assessment may be considered to be appropriate, and what constitutes 'suitable trigger point(s)'.

Summary:
Welcome the pragmatic and flexible approach to planning obligations, but concerns remain about Part B. As written, this may result in a re-assessment of the agreed lower level of contribution once development commences. This will introduce unnecessary uncertainty to developers. Further info required as to when such a re-assessment may be considered appropriate and what constitutes 'suitable trigger points'.

Response:
In respect to Part b of Policy 67, in line with the revisions to national policy and guidance, the Council's view is that the need for appraisals at application stage should be exceptional rather than the norm with an up-to-date local plan and policies tested for whole plan viability upfront. However, where genuine circumstances warranted an appraisal as part of an application then it is considered best practice to allow for a future review, especially for very large developments that may build out over several years during which market conditions may change. It is also considered that this policy could apply to circumstances where economic conditions change for the worse, as was the case post 2008 when a number of applications started to be accompanied with a viability appraisal and seeking reduced/deferred/future consideration of planning obligations in the interests of development viability and delivery.
13.1. Framecourt Homes is concerned with aspects of Policy 67. Test of Soundness 13.2. Framecourt Homes considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 13.3. Framecourt Homes is supportive of the need for developer contributions. The Framework is, however, clear that the derivation of developer contributions must not only take account of need but also viability. Paragraph 34 of the Framework (2018) established 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. 13.4. Appendices 3-10 of the Viability Report (2019) show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support 15% affordable housing, prior to consideration of other policy requirements. In some circumstances schemes in the medium value areas would also struggle to provide the 15 percent required by this policy, when other policy requirements were considered. It should be noted that the Policy B requirement for affordable housing is 23% for high and medium value areas. 13.5. Framecourt Homes is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. 13.6. 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. 13.7. Furthermore, Framecourt Homes considers that there may be some circumstances where this policy and the use of trigger points in Part B can be utilised to bring forward the delivery of homes. However, Framecourt Homes have significant concerns around the implementation of this policy and how frequently it will be used. 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. Framecourt Homes considers that this policy causes unnecessary uncertainty and additional risk for developers, and therefore the policy could become an impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long time periods. 13.8. Framecourt Homes are concerned that the whole plan viability does not fully consider the in combination impacts of the Plan requirements. It is also considered that Part B does not provide sufficient certainty. Framecourt Homes considers that the Plan is not justified and are not consistent with the Framework. 13.9. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 13.10. Framecourt Homes consider that with increased flexibility in the Plan requirements and review of the viability assessment the Plan can be made sound. Framecourt Homes will continue to work with the Council to develop appropriate modifications. Proposed Change 13.11. To overcome the objection and address soundness matters, the Council should: - Review and update the viability assessment. - Provide clarity on Part B or remove.

Summary:
Supportive of the need for developer contributions, but these must take account of need and viability. Para 34 establishes the importance of viability to ensure development should not be burdened with obligations which might threaten deliverability. Some areas cannot deliver 15% affordable housing prior to consideration of any other policy requirements. Some medium areas would also struggle to provide this when other policy requirements are considered, even though the requirement is 23% in high and medium value areas. Concerned that this could undermine delivery through the need for regular viability assessments.

Response:
See response to Policy 8 and/or 66 in respect to the viability testing evidence base. In respect to Part b of Policy 67, in line with the revisions to national policy and guidance, the Council's view is that the need for appraisals at application stage should be exceptional rather than the norm with an up-to-date local plan and policies tested for whole plan viability upfront. However, where genuine circumstances warrant an appraisal as part of an application then it is considered only best practice to allow for a future review, especially for very large developments that may build out over several years during which market conditions may change. It is also considered that this policy could apply to circumstances where economic conditions change for the worse, as was the case post 2008 when a number of applications started to be accompanied with a viability appraisal and seeking reduced/deferred/future consideration of planning obligations in the interests of development viability and delivery.
We act for a number of major land owners in the Doncaster area, we have detailed knowledge of the sites and the planning history of the Borough. We have previously been involved with the Core Strategy Plan and with the Examination of the draft Sites and Policies DPD. Our knowledge of the various land parcels, ownerships, the strategic land position and site specific details, means that we have information to inform the debate regarding the overall housing requirement and the specific allocation of sites which will assist the examination.

The Plan should include a robust figure and needs to include text that makes it clear that the affordable housing has to be viable. Viability testing on sites at this stage will be unreliable until a full suite of technical documents have assessed the site development costs and infrastructure requirements. The Plan should therefore reflect affordable housing requirements as aspirational but subject to detailed site viability.

**PROPOSED CHANGE**

7. Provide a robust figure for affordable housing. As explained in detail above.

**Summary:**

Objects to policy - 23% affordable housing requirement is not justified by the evidence. 209 units/annum affordable does not take account of permissions so is an unreliable figure. The Plan should include a robust figure and the text make clear that affordable housing has to be viable. Testing sites at this stage will be unreliable until full technical studies have assessed development costs and infrastructure requirements. Should therefore reflect affordable housing requirements are aspirational but subject to detailed site viability.

**Response:**

See response to Policy 8 and/or 66 in respect to the viability testing evidence base.
Policy 67: Development Viability

Tests of Soundness:
- Positively prepared
- Consistent with national
- Justified
- Effective

Comment:

14.1. Avant Homes is concerned with aspects of Policy 67. Test of Soundness 14.2. Avant Homes considers that the Local Plan is unsound.
Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification

14.3. Avant Homes is supportive of the need for developer contributions. The Framework is, however, clear that the derivation of developer contributions must not only take account of need but also viability. Paragraph 34 of the Framework (2018) established 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. 14.4. Appendices 3-10 of the Viability Report (2019) show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support 15% affordable housing, prior to consideration of other policy requirements. In some circumstances schemes in the medium value areas would also struggle to provide the 15 percent required by this policy, when other policy requirements were considered. It should be noted that the Policy B requirement for affordable housing is 23% for high and medium value areas.

14.5. Avant Homes is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. 14.6. 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.

14.7. Furthermore, Avant Homes considers that there may be some circumstances where this policy and the use of trigger points in Part B can be utilised to bring forward the delivery of homes. However, Avant Homes have significant concerns around the implementation of this policy and how frequently it will be used. 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. Avant Homes considers that this policy causes unnecessary uncertainty and additional risk for developers, and therefore the policy could become an impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long time periods. 14.8. Avant Homes are concerned that the whole plan viability does not fully consider the in combination impacts of the Plan requirements. It is also considered that Part B does not provide sufficient certainty. Avant Homes considers that the Plan is not justified and are not consistent with the Framework. 14.9. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 14.10. Avant Homes consider that with increased flexibility in the Plan requirements and review of the viability assessment the Plan can be made sound. Avant Homes will continue to work with the Council to develop appropriate modifications. Proposed Change 14.11. To overcome the objection and address soundness matters, the Council should: - Review and update the viability assessment. - Provide clarity on Part B or remove.

Summary:
Supportive of developer contributions, however the framework is clear that the derivation of developer contributions should take account of need but also viability. Paragraph 34 of the Framework (2018) established 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. Appendices 3-10 of the Viability report show real issues for some sites, such as scheme in low value areas being unable to support 15% affordable housing prior to consideration of other policy requirements. Some medium value area sites would also struggle when other considerations are factored in.

Concerned that with all other policy requirements this could undermine the delivery of housing through the need for regular viability assessments. Must be aware that viability assessments and subsequent obligation negotiation can have impacts on delivery. It is unrealistic to negotiate on a one by one site basis because the obligations are too high. Negotiations should be occasional, not routine. Concern that there may be some circumstances where the policy and use of trigger points in part B can be utilised to bring forward the delivery of homes. Have significant concerns about the implementation of the policy and how often it will be used. Trigger points create further burden for developers. The policy created unnecessary uncertainty and additional risk for developers, and therefore impede development process and compromise the delivery of large sites and those phased over time. Concerned that the whole plan viability does not fully consider the in combination impacts of the Plan requirements. It is also considered that Part B does not provide sufficient certainty. Avant Homes considers that the Plan is not justified and are not consistent with the Framework. Do not consider the plan sound. Proposed change: review and update the viability assessment and provide clarity on Part B or remove.
See response to Policy 8 and/or 66 in respect to the viability testing evidence base. In respect to Part b of Policy 67, in line with the revisions to national policy and guidance, the Council's view is that the need for appraisals at application stage should be exceptional rather than the norm with an up-to-date local plan and policies tested for whole plan viability upfront. However, where genuine circumstances warrant an appraisal as part of an application then it is considered only best practice to allow for a future review, especially for very large developments that may build out over several years during which market conditions may change. It is also considered that this policy could apply to circumstances where economic conditions change for the worse, as was the case post 2008 when a number of applications started to be accompanied with a viability appraisal and seeking reduced/deferred/future consideration of planning obligations in the interests of development viability and delivery.
14.1. Avant Homes is concerned with aspects of Policy 67. Test of Soundness 14.2. Avant Homes considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 14.3. Avant Homes is supportive of the need for developer contributions. The Framework is, however, clear that the derivation of developer contributions must not only take account of need but also viability. Paragraph 34 of the Framework (2018) established 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. 14.4. Appendices 3-10 of the Viability Report (2019) show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support 15% affordable housing, prior to consideration of other policy requirements. In some circumstances schemes in the medium value areas would also struggle to provide the 15 percent required by this policy, when other policy requirements were considered. It should be noted that the Policy B requirement for affordable housing is 23% for high and medium value areas. 14.5. Avant Homes is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the schemes identified and allocated are deliverable. 14.6. 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. 14.7. Furthermore, Avant Homes considers that there may be some circumstances where this policy and the use of trigger points in Part B can be utilised to bring forward the delivery of homes. However, Avant Homes have significant concerns around the implementation of this policy and how frequently it will be used. 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. Avant Homes considers that this policy causes unnecessary uncertainty and additional risk for developers, and therefore the policy could become an impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long time periods. 14.8. Avant Homes are concerned that the whole plan viability does not fully consider the in combination impacts of the Plan requirements. It is also considered that Part B does not provide sufficient certainty. Avant Homes considers that the Plan is not justified and are not consistent with the Framework. 14.9. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 14.10. Avant Homes consider that with increased flexibility in the Plan requirements and review of the viability assessment the Plan can be made sound. Avant Homes will continue to work with the Council to develop appropriate modifications. Proposed Change 14.11. To overcome the objection and address soundness matters, the Council should: - Review and update the viability assessment. - Provide clarity on Part B or remove.

Summary:
Supportive of developer contributions, however the framework is clear that the derivation of developer contributions should take account of need but also viability. Paragraph 34 of the Framework (2018) established 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. Appendices 3 - 10 of the Viability report show real issues for some sites, such as scheme in low value areas being unable to support 15% affordable housing prior to consideration of other policy requirements. Some medium value area sites would also struggle when other considerations are factored in. Concerned that with all other policy requirements this could undermine the delivery of housing through the need for regular viability assessments. Must be aware that viability assessments and subsequent obligation negotiation can have impacts on delivery. It is unrealistic to negotiate on a one by one site basis because the obligations are too high. Negotiations should be occasional, not routine. Concern that there may be some circumstances where the policy and use of trigger points in part B can be utilised to bring forward the delivery of homes. Have significant concerns about the implementation of the policy and how often it will be used. Trigger points create further burden for developers. The policy created unnecessary uncertainty and additional risk for developers, and therefore impede development process and compromise the delivery of large sites and those phased over time. Concerned that the whole plan viability does not fully consider the in combination impacts of the Plan requirements. It is also considered that Part B does not provide sufficient certainty. Avant Homes considers that the Plan is not justified and are not consistent with the Framework. Do not consider the plan sound. Proposed change: review and update the viability assessment and provide clarity on Part B or remove.
See response to Policy 8 and/or 66 in respect to the viability testing evidence base. In respect to Part b of Policy 67, in line with the revisions to national policy and guidance, the Council's view is that the need for appraisals at application stage should be exceptional rather than the norm with an up-to-date local plan and policies tested for whole plan viability upfront. However, where genuine circumstances warrant an appraisal as part of an application then it is considered only best practice to allow for a future review, especially for very large developments that may build out over several years during which market conditions may change. It is also considered that this policy could apply to circumstances where economic conditions change for the worse, as was the case post 2008 when a number of applications started to be accompanied with a viability appraisal and seeking reduced/deferred/future consideration of planning obligations in the interests of development viability and delivery.
Policy 67: Development Viability

Attend Hearing

Consistency with National Policy

Summary:

Supportive of developer contributions, however the framework is clear that the derivation of developer contributions should take account of need but also viability. Paragraph 34 of the Framework (2018) established 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. Appendices 3-10 of the Viability Report (2019) show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support 15% affordable housing, prior to consideration of other policy requirements. In some circumstances schemes in the medium value areas would also struggle to provide the 15 percent required by this policy, when other policy requirements were considered. It should be noted that the Policy B requirement for affordable housing is 23% for high and medium value areas.

Avant Homes is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable.

Furthermore, Avant Homes considers that there may be some circumstances where this policy and the use of trigger points in Part B can be utilised to bring forward the delivery of homes. However, Avant Homes have significant concerns around the implementation of this policy and how frequently it will be used. 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.

Avant Homes considers that this policy causes unnecessary uncertainty and additional risk for developers, and therefore the policy could become an impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long time periods.

Avant Homes are concerned that the whole plan viability does not fully consider the in combination impacts of the Plan requirements. It is also considered that Part B does not provide sufficient certainty. Avant Homes considers that the Plan is not justified and are not consistent with the Framework.

Concerned with all other policy requirements this could undermine the delivery of housing through the need for regular viability assessments. Must be aware that viability assessments and subsequent obligation negotiation can have impacts on delivery. It is unrealistic to negotiate on a one by one site basis because the obligations are too high. Negotiations should be occasional, not routine. Concern that there may be some circumstances where the policy and use of trigger points in part B can be utilised to bring forward the delivery of homes. Have significant concerns about the implementation of the policy and how often it will be used. Trigger points create further burden for developers.

The policy created unnecessary uncertainty and additional risk for developers, and therefore impede development process and compromise the delivery of large sites and those phased over time.

Concerned that the whole plan viability does not fully consider the in combination impacts of the Plan requirements. It is also considered that Part B does not provide sufficient certainty. Avant Homes considers that the Plan is not justified and are not consistent with the Framework. Do not consider the plan sound. Proposed change: review and update the viability assessment and provide clarity on Part B or remove.

Tests of Soundness:

- Positively prepared
- Effective
- Justified
- Consistent with national

Comment:

14.1. Avant Homes is concerned with aspects of Policy 67. Test of Soundness 14.2. Avant Homes considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy

Justification

Policy 67: Development Viability

Area: Chapter 15: Implementation & Monitoring

Reason:

Comment Ref: C/Policy 67/05210/1/015

Consistent with national

Effective

Justified

Positively prepared

Proposed Change
See response to Policy 8 and/or 66 in respect to the viability testing evidence base. In respect to Part b of Policy 67, in line with the revisions to national policy and guidance, the Council's view is that the need for appraisals at application stage should be exceptional rather than the norm with an up-to-date local plan and policies tested for whole plan viability upfront. However, where genuine circumstances warrant an appraisal as part of an application then it is considered only best practice to allow for a future review, especially for very large developments that may build out over several years during which market conditions may change. It is also considered that this policy could apply to circumstances where economic conditions change for the worse, as was the case post 2008 when a number of applications started to be accompanied with a viability appraisal and seeking reduced/deferred/future consideration of planning obligations in the interests of development viability and delivery.
15.1. Avant Homes is concerned with aspects of Policy 67. Test of Soundness 15.2. Avant Homes considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification

15.3. Avant Homes is supportive of the need for developer contributions. The Framework is, however, clear that the derivation of developer contributions must not only take account of need but also viability. Paragraph 34 of the Framework (2018) established 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. 15.4. Appendices 3-10 of the Viability Report (2019) show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support 15% affordable housing, prior to consideration of other policy requirements. In some circumstances schemes in the medium value areas would also struggle to provide the 15 percent required by this policy, when other policy requirements were considered. It should be noted that the Policy B requirement for affordable housing is 23% for high and medium value areas. 15.5. Avant Homes is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of obligations. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. 15.6. 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. 15.7. Furthermore, Avant Homes considers that there may be some circumstances where this policy and the use of trigger points in Part B can be utilised to bring forward the delivery of homes. However, Avant Homes have significant concerns around the implementation of this policy and how frequently it will be used. 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. Avant Homes considers that this policy causes unnecessary uncertainty and additional risk for developers, and therefore the policy could become an impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long time periods. 15.8. Avant Homes are concerned that the whole plan viability does not fully consider the in combination impacts of the Plan requirements. It is also considered that Part B does not provide sufficient certainty. Avant Homes considers that the Plan is not justified and are not consistent with the Framework. 15.9. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 15.10. Avant Homes consider that with increased flexibility in the Plan requirements and review of the viability assessment the Plan can be made sound. Avant Homes will continue to work with the Council to develop appropriate modifications. Proposed Change 15.11. To overcome the objection and address soundness matters, the Council should: - Review and update the viability assessment. - Provide clarity on Part B or remove Part B.

Summary:
Policy 67 - Development Viability. 1. Policy is an impediment to development and compromises deliverability. 2. Viability assessment should be reviewed and updated. 3. Provide clarity in Part B or remove trigger points - they are a burden on development.

Response:
See response to Policy 8 and/or 66 in respect to the viability testing evidence base. In respect to Part b of Policy 67, in line with the revisions to national policy and guidance, the Council's view is that the need for appraisals at application stage should be exceptional rather than the norm with an up-to-date local plan and policies tested for whole plan viability upfront. However, where genuine circumstances warrant an appraisal as part of an application then it is considered only best practice to allow for a future review, especially for very large developments that may build out over several years during which market conditions may change. It is also considered that this policy could apply to circumstances where economic conditions change for the worse, as was the case post 2008 when a number of applications started to be accompanied with a viability appraisal and seeking reduced/deferred/future consideration of planning obligations in the interests of development viability and delivery.
13.1. Priority Space is concerned with aspects of Policy 67. Test of Soundness 13.2. Priority Space considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy

Justification

13.3. Priority Space is supportive of the need for developer contributions. The Framework is, however, clear that the derivation of developer contributions must not only take account of need but also viability. Paragraph 34 of the Framework (2018) established 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. 13.4. Appendixes 3-10 of the Viability Report (2019) show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support 15% affordable housing, prior to consideration of other policy requirements. In some circumstances schemes in the medium value areas would also struggle to provide the 15 percent required by this policy, when other policy requirements were considered. It should be noted that the Policy B requirement for affordable housing is 23% for high and medium value areas.

13.5. Priority Space is concerned that with all the policy requirements the Local Plan details could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the site identified and allocated are deliverable. 13.6. 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.

13.7. Furthermore, Priority Space considers that there may be some circumstances where this policy and the use of trigger points in Part B can be utilised to bring forward the delivery of homes. However, Priority Space have significant concerns around the implementation of this policy and how frequently it will be used. 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. Priority Space considers that this policy causes unnecessary uncertainty and additional risk for developers, and therefore the policy could become an impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long time periods. 13.8. Priority Space are concerned that the whole plan viability does not fully consider the in combination impacts of the Plan requirements. It is also considered that Part B does not provide sufficient certainty. Priority Space considers that the Plan is not justified and are not consistent with the Framework. 13.9. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 13.10. Priority Space consider that with increased flexibility in the Plan requirements and review of the viability assessment the Plan can be made sound. Priority Space will continue to work with the Council to develop appropriate modifications. Proposed Change 13.11. To overcome the objection and address soundness matters, the Council should: - Review and update the viability assessment. - Provide clarity on Part B or remove.

Summary:

Policy 67 - Development Viability. 1. Policy is an impediment to development and compromises deliverability. 2. Viability assessment should be reviewed and updated. 3. Provide clarity in Part B or remove trigger points - they are a burden on development. Includes as an Appendix (1): Regeneris Report - Review of Objectively Assessed Housing need.

Response:

See response to Policy 8 and/or 66 in respect to the viability testing evidence base. In respect to Part b of Policy 67, in line with the revisions to national policy and guidance, the Council’s view is that the need for appraisals at application stage should be exceptional rather than the norm with an up-to-date local plan and policies tested for whole plan viability upfront. However, where genuine circumstances warrant an appraisal as part of an application then it is considered only best practice to allow for a future review, especially for very large developments that may build out over several years during which market conditions may change. It is also considered that this policy could apply to circumstances where economic conditions change for the worse, as was the case post 2008 when a number of applications started to be accompanied with a viability appraisal and seeking reduced/deferred/future consideration of planning obligations in the interests of development viability and delivery.
Tests of Soundness: Positively prepared Effective Justified Consistent with national

Comment:

13.1. Firsure is concerned with aspects of Policy 67. Test of Soundness 13.2. Firsure considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 13.3. Firsure is supportive of the need for developer contributions. The Framework is, however, clear that the derivation of developer contributions must not only take account of need but also viability. Paragraph 34 of the Framework (2018) established 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. 13.4. Appendices 3-10 of the Viability Report (2019) show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support 15% affordable housing, prior to consideration of other policy requirements. In some circumstances schemes in the medium value areas would also struggle to provide the 15 percent required by this policy, when other policy requirements were considered. It should be noted that the Policy 8 requirement for affordable housing is 23% for high and medium value areas. 13.5. Firsure is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. 13.6. 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. 13.7. Furthermore, Firsure considers that there may be some circumstances where this policy and the use of trigger points in Part B can be utilised to bring forward the delivery of homes. However, Firsure have significant concerns around the implementation of this policy and how frequently it will be used. 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. Firsure considers that this policy causes unnecessary uncertainty and additional risk for developers, and therefore the policy could become an impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long time periods. 13.8. Firsure are concerned that the whole plan viability does not fully consider the in combination impacts of the Plan requirements. It is also considered that Part B does not provide sufficient certainty. Firsure considers that the Plan is not justified and are not consistent with the Framework. 13.9. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 13.10. Firsure consider that with increased flexibility in the Plan requirements and review of the viability assessment the Plan can be made sound. Firsure will continue to work with the Council to develop appropriate modifications. Proposed Change 13.11. To overcome the objection and address soundness matters, the Council should: - Review and update the viability assessment. - Provide clarity on Part B or remove.

Summary:

Concerned with aspects of Policy 67. The Framework is clear that the derivation of developer contributions must not only take account of need but also viability. Paragraph 34 of the Framework (2018) established 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. Appendices 3-10 of the Viability Report (2019) show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support 15% affordable housing, prior to consideration of other policy requirements. In some circumstances schemes in the medium value areas would also struggle to provide the 15 percent required by this policy, when other policy requirements were considered. It should be noted that the Policy 8 requirement for affordable housing is 23% for high and medium value areas. Concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. 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. There may be some circumstances where this policy and the use of trigger points in Part B can be utilised to bring forward the delivery of homes. Have significant concerns around the implementation of this policy and how frequently it will be used. 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 therefore the policy could become an impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long

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Concerned that the whole plan viability does not fully consider the in combination impacts of the Plan requirements. It is also considered that Part B does not provide sufficient certainty. With increased flexibility in the Plan requirements and review of the viability assessment the Plan can be made sound. The Council should:
- Review and update the viability assessment.
- Provide clarity on Part B or remove.

**Response:**

See response to Policy 8 and/or 66 in respect to the viability testing evidence base. In respect to Part b of Policy 67, in line with the revisions to national policy and guidance, the Council's view is that the need for appraisals at application stage should be exceptional rather than the norm with an up-to-date local plan and policies tested for whole plan viability upfront. However, where genuine circumstances warrant an appraisal as part of an application then it is considered only best practice to allow for a future review, especially for very large developments that may build out over several years during which market conditions may change. It is also considered that this policy could apply to circumstances where economic conditions change for the worse, as was the case post 2008 when a number of applications started to be accompanied with a viability appraisal and seeking reduced/deferred/future consideration of planning obligations in the interests of development viability and delivery.
Tests of Soundness: Positively prepared Effective Justified Consistent with national

Comment:

15.1. Metroland is concerned with aspects of Policy 67. Test of Soundness. 15.2. Metroland considers that the Local Plan is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification

15.3. Metroland is supportive of the need for developer contributions. The Framework is, however, clear that the derivation of developer contributions must not only take account of need but also viability. Paragraph 34 of the Framework (2018) established 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. 15.4. Appendices 3-10 of the Viability Report (2019) show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support 15% affordable housing, prior to consideration of other policy requirements. In some circumstances schemes in the medium value areas would also struggle to provide the 15% required by this policy, when other policy requirements were considered. It should be noted that the Policy B requirement for affordable housing is 23% for high and medium value areas.

15.5. Metroland is concerned that with all the policy requirements the Local Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The viability assessment shows that a significant proportion of sites will not be able to achieve affordable housing due to viability matters. The Government is keen to avoid such a situation where viability assessments are being submitted regularly to vary planning policy obligations. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing target. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable. 15.6. 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.

15.7. Furthermore, Metroland considers that there may be some circumstances where this policy and the use of trigger points in Part B can be utilised to bring forward the delivery of homes. However, Metroland have significant concerns around the implementation of this policy and how frequently it will be used. 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. Metroland considers that this policy causes unnecessary uncertainty and additional risk for developers, and therefore the policy could become an impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long time periods. 15.8. Metroland are concerned that the whole plan viability does not fully consider the in combination impacts of the Plan requirements. It is also considered that Part B does not provide sufficient certainty. Metroland considers that the Plan is not justified and are not consistent with the Framework.

15.9. In these circumstances, we do not consider the Doncaster Local Plan, in its current form, to be sound. 15.10. Metroland consider that with increased flexibility in the Plan requirements and review of the viability assessment the Plan can be made sound. Metroland will continue to work with the Council to develop appropriate modifications. Proposed Change 15.11. To overcome the objection and address soundness matters, the Council should: - Review and update the viability assessment. - Provide clarity on Part B or remove Part B.

Summary:

Policy 67 - Development Viability. 1. Policy is an impediment to development and compromises deliverability. 2. Viability assessment should be reviewed and updated. 3. Provide clarity in Part B or remove trigger points - they are a burden on development.

Response:

See response to Policy 8 and/or 66 in respect to the viability testing evidence base. In respect to Part b of Policy 67, in line with the revisions to national policy and guidance, the Council’s view is that the need for appraisals at application stage should be exceptional rather than the norm with an up-to-date local plan and policies tested for whole plan viability upfront. However, where genuine circumstances warrant an appraisal as part of an application then it is considered only best practice to allow for a future review, especially for very large developments that may build out over several years during which market conditions may change. It is also considered that this policy could apply to circumstances where economic conditions change for the worse, as was the case post 2008 when a number of applications started to be accompanied with a viability appraisal and seeking reduced/deferred/future consideration of planning obligations in the interests of development viability and delivery.
Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

**Comment:**

It is considered that 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. 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. We consider that this policy causes unnecessary uncertainty and additional risk for developers, and that such disincentivising of developers could become an impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long time periods.

**Summary:**

It is considered that 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. 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. We consider that this policy causes unnecessary uncertainty and additional risk for developers, and that such disincentivising of developers could become an impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long time periods.

**Response:**

In respect to Part b of Policy 67, in line with the revisions to national policy and guidance, the Council’s view is that the need for appraisals at application stage should be exceptional rather than the norm with an up-to-date local plan and policies tested for whole plan viability upfront. However, where genuine circumstances warrant an appraisal as part of an application then it is considered only best practice to allow for a future review, especially for very large developments that may build out over several years during which market conditions may change. It is also considered that this policy could apply to circumstances where economic conditions change for the worse, as was the case post 2008 when a number of applications started to be accompanied with a viability appraisal and seeking reduced/deferred/future consideration of planning obligations in the interests of development viability and delivery.
We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Tests of Soundness:

Comment:
It is considered that 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. 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. We consider that this policy causes unnecessary uncertainty and additional risk for developers, and that such disincentivising of developers could become an impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long time periods.

Summary:
It is considered that 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. 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. We consider that this policy causes unnecessary uncertainty and additional risk for developers, and that such disincentivising of developers could become an impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long time periods.

Response:
In respect to Part b of Policy 67, in line with the revisions to national policy and guidance, the Council’s view is that the need for appraisals at application stage should be exceptional rather than the norm with an up-to-date local plan and policies tested for whole plan viability upfront. However, where genuine circumstances warrant an appraisal as part of an application then it is considered best practice to allow for a future review, especially for very large developments that may build out over several years during which market conditions may change. It is also considered that this policy could apply to circumstances where economic conditions change for the worse, as was the case post 2008 when a number of applications started to be accompanied with a viability appraisal and seeking reduced/deferred/future consideration of planning obligations in the interests of development viability and delivery.
Comment Ref: C/Policy 67/05319/1/018

Attend Examination: Attend Hearing

Reason: The matters raised in our representation go to the heart of the Local Plan. It is considered that attendance at the relevant hearing sessions will allow further comment to be made where appropriate.

Area: Chapter 15: Implementation & Monitoring

Policy: Policy 67: Development Viability

Comment:

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.

Summary:

Policy 67 Trigger Points. 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.

Response:

See response to Policy 8 and/or 66 in respect to the viability testing evidence base. In respect to Part b of Policy 67, in line with the revisions to national policy and guidance, the Council’s view is that the need for appraisals at application stage should be exceptional rather than the norm with an up-to-date local plan and policies tested for whole plan viability upfront. However, where genuine circumstances warrant an appraisal as part of an application then it is considered only best practice to allow for a future review, especially for very large developments that may build out over several years during which market conditions may change. It is also considered that this policy could apply to circumstances where economic conditions change for the worse, as was the case post 2008 when a number of applications started to be accompanied with a viability appraisal and seeking reduced/deferred/future consideration of planning obligations in the interests of development viability and delivery.
Limited infilling or the partial or complete re-development of the site for housing would deliver 12 or more family dwellings would deliver 15% of the land as open space or a commuted sum in lieu of open space (if not designed in). The Site can be considered as limited infill in the villages of Arksey and Stockbridge. The railway line to the west provides a defined boundary as a physical feature that is recognisable and as such provides a very likely permanent feature that will ensure that the village of Arksey will not merge to Stockbridge and Bentley. The railway line and the former Arksey and Stockbridge Station, which served the villages of Arksey and Stockbridge. The railway line to the west of the site now forms part of the East Coast Main Line and that there is a permanent brick structure remaining on site. (SEE EMAIL FOR Aerial Photo) The site backs on to Arksey Cemetery and is bound by mature trees. There is a single point of vehicular access onto Station Road with pedestrian access from Station Road, through the site to the cemetery. The formal public right of way does not cross the site, however, the pedestrian access from the cemetery through the site is regularly used and maintained by the land owner. (SEE EMAIL FOR PROW Route) A 4-mile walk starts at Arksey Church and takes a circular route around the village and surrounding countryside including Arksey Ings, a designated local wildlife site, to the northern boundary. Station Road benefits from street lighting, a 30mph speed restriction and there is a bus stop directly outside of the site. The Site  The site is 0.39Ha in size and currently used as grazing land and brownfield land in that it was associated with the railway line and the former Arksey and Stockbridge Station, which served the villages of Arksey and Stockbridge. The railway line to the west of the site now forms part of the East Coast Main Line and that there is a permanent brick structure remaining on site. (SEE EMAIL FOR Aerial Photo) The site backs on to Arksey Cemetery and is bound by mature trees. There is a single point of vehicular access onto Station Road with pedestrian access from Station Road, through the site to the cemetery. The formal public right of way does not cross the site, however, the pedestrian access from the cemetery through the site is regularly used and maintained by the land owner. (SEE EMAIL FOR PROW Route) A 4-mile walk starts at Arksey Church and takes a circular route around the village and surrounding countryside including Arksey Ings, a designated local wildlife site, to the northern boundary. Station Road benefits from street lighting, a 30mph speed restriction and there is a bus stop directly outside of the site. The Site is within close proximity to the level crossing. Site Allocation and Planning Policy The site is currently defined as Green Belt within the Adopted Doncaster Unitary Development Plan 1998. The site is outside of the Conservation Area. (SEE EMAIL FOR UDP Extract) Core Strategy The Core Strategy defines Arksey as a Larger Defined Village within the Settlement Hierarchy whereby defined villages will be conserved and enhanced. Quality infill will be permitted. Existing village boundaries will be amended only if necessary to establish defensible boundaries and, within the Green Belt, where there are exceptional circumstances. Emerging Local Plan The settlement hierarchy defines Arksey as a ‘Defined Village’, defined villages are identified as suitable for limited development in ‘appropriate’ locations within defined village development limits. NPPF 2018 The NPPF states that the Local Planning Authority should have regard to the construction of new buildings as inappropriate development in the Green Belt except: - Limited infilling in villages; - Limited infilling or the partial or complete re-development of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: o Not have a greater impact on the openness of the existing development; or o Not cause substantial harm to the openness of the Green Belt, where development would re-use previously developed land and contribute towards meeting an affordable housing need within the area of the local planning authority. Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Flood Risk Parts of the site to the east and west lie within Flood Zone 1, a low risk of flooding. The centre of the site lies within Flood Zone 2, a medium probability of flooding. The Environment Agency classifies residential development as 'more vulnerable' and as such as part of the site is located within Flood Zone 2 a flood risk assessment is required. The land owner is committed to commissioning a site-specific flood risk assessment for the site, if required. (SEE EMAIL FOR Flood Map) The site is close to Bentley, which is defined as part of the Doncaster Main Urban area, however, most of Bentley is affected by a high risk of flood (Flood Zone 3) and as such housing delivery in this particular area will be challenging as the Council’s approach to discount all Flood Zone 3 sites as part of the Local Plan. Sustainability and Access to Services The site is: - around 1 mile from Bentley Train Station - around 3.5 miles from Doncaster - in easy access to the A1 motorway - within close proximity to Arksey Primary School - close to tea rooms, public house, shops and other local facilities - within easy reach of countryside walks and opportunities for health and wellbeing. Material Planning Considerations In promoting the site for residential development, the following points support the inclusion of the land within the development limit of Arksey. - The railway line to the west provides a defined boundary as a physical feature that is recognisable and as such provides a very likely permanent feature that will ensure that the village of Arksey will not merge to Stockbridge and Bentley. - It is not necessary to keep the land permanently open in that it does not serve any useful purpose in meeting in relation to keeping a check of unrestricted sprawl or safeguarding the countryside from encroachment as this provided by the existing cemetery to the south east of the site. - The site can be considered as limited infill in the defined village of Arksey and will complete the linear settlement along Station Road characterised by the development opposite the site to the north west. The development of the site will provide a natural completion to the village with the development limit formed by the railway line. - The land is brownfield and serves no useful purpose as open space or Green Belt purpose, the designation of the land as housing or mixed use will potentially deliver regeneration and housing benefits to village of Arksey, which is close to Bentley, one of the most deprived areas of Doncaster. - Development of the site for housing would deliver 12-14 Residential Units (compliant with the South Yorkshire Residential Design Guide). - 10 or more family dwellings would deliver 15% of the land as open space or a commuted sum in lieu of open space (if not designed in) which would enhance the current open space provision in Arksey or the local area. The community profile area of Bentley is deficient in informal play space, formal play space and public parks. - Residential development would deliver Council Tax benefits to the Borough. - The site is within a sustainable location. Availability The land is available within 0-5 years as the land is within one ownership and the private land owner has committed to initial feasibility studies in relation to the site. Achievability The site is not being actively marketed, the land owner/developer will directly progress the delivery of the site. It will be possible to deliver the site as a whole, within one phase and will contribute toward the SME developer offer. Abnormal Costs In terms of bringing the site forward there are no known abnormal costs above and
beyond the normal development management considerations. The material considerations and required surveys are as follows: - Tree and Ecology Surveys - The site is constrained by trees albeit these are on the boundary of the site many of which could be retained as part of the development. The frontage trees along Station Road are of amenity value and provide an attractive entrance to the village. Surveys have been commissioned in respect of the condition of the trees and any potential habitats. - Highway Access and Transportation - The site has the benefit of a vehicular access; however, further assessment will be required in terms of access and highway layout. Station Road is a busy road with vehicles backing from the level crossing however, potential alternative access could be taken from the cemetery road subject to further negotiation. - Flooding - The site is located within flood zones 1 and 2. There are very few pockets of low flood risk areas in the locality. A site-specific flood risk assessment would identify mitigation measures to be incorporate into the site layout and design. - Contaminated Land - There is no known contaminated land associated with the site however a Phase 1 Assessment would outline any potential risks that may need to be mitigated. - Noise - The site is close to the railway line and as such noise impact can be mitigated through construction techniques and noise attenuation buffer along the railway boundary. - The site is close to existing utilities infrastructure in terms of drainage, electricity, mains gas and communications. Exceptional Circumstances - The use of the land for housing would not impact on openness and as such there will be no harm on the Greenbelt or visual impact on the countryside beyond the cemetery. - The railway line acts as a permanent feature in preventing urban sprawl. - The development of the site would not represent encroachment into the countryside. - The development of the site would not affect the setting and special character of the historic village. - The use of the land for housing is sustainable development in that it would meet the economic, social and environmental objectives as set out above. - The inclusion of the land within the settlement of Arksey will provide a small permanent structure in preventing urban sprawl. - The development of the site would not affect the setting and special character of the historic village. - The use of the land for housing is sustainable development in that it would meet the economic, social and environmental objectives as set out above. - The inclusion of the land within the settlement of Arksey will provide a small permanent structure in preventing urban sprawl. Exceptional Circumstances - The use of the land for housing would not impact on openness and as such there will be no harm on the Greenbelt or visual impact on the countryside beyond the cemetery. - The railway line acts as a permanent feature in preventing urban sprawl. - The development of the site would not represent encroachment into the countryside. - The development of the site would not affect the setting and special character of the historic village. - The use of the land for housing is sustainable development in that it would meet the economic, social and environmental objectives as set out above. - The inclusion of the land within the settlement of Arksey will provide a small permanent structure in preventing urban sprawl. - The development of the site would not affect the setting and special character of the historic village. - The use of the land for housing is sustainable development in that it would meet the economic, social and environmental objectives as set out above. - The inclusion of the land within the settlement of Arksey will provide a small permanent structure in preventing urban sprawl. - The development of the site would not represent encroachment into the countryside. - The development of the site would not affect the setting and special character of the historic village.

Response:

The Local Plan is not seeking to allocate any land in Arksey as this is not deemed to be one of the sustainable locations for growth in the Borough. Additionally, the site is in both Green Belt and partially in flood zone 2, the latter not being land the Local Plan will allocate on, and the former requiring exceptional circumstances.

Summary:

Site South of Station Road Arksey. 1. Proposing site for allocation for residential use. 2. Not previously put forward. 3. Site is Greenbelt. 4. Includes data/information to support proposed use and allocation.

Response:

The Local Plan is not seeking to allocate any land in Arksey as this is not deemed to be one of the sustainable locations for growth in the Borough. Additionally, the site is in both Green Belt and partially in flood zone 2, the latter not being land the Local Plan will allocate on, and the former requiring exceptional circumstances.
These representations should be read in conjunction with our previous representations submitted by Johnson Mowat, on our behalf, in relation to site 829 (HELAA) for the land to the north of Arksey Common Lane, Arksey. We continue to strongly object to the publication version of the Plan and do not consider that there is any justification provided why Defined Villages are not included in the distribution of Doncaster’s housing requirement. The publication version of the Plan continues to define Arksey as one of 40 Defined Villages where there is no proposed housing growth, aside from windfall opportunities. The publication version states that all of these villages have poorer service provision than the 18 settlements identified for housing growth. We continue to maintain that Arksey is inappropriately defined as a 'Defined Village', given its particular credentials and location abutting Bentley and thereby the Main Urban Area of Doncaster. Arksey is therefore considered to function in a manner which is distinctly different from the other Defined Villages and is the only Defined Village that is very well linked to the Main Urban Area. The Main Urban Area settlement maps include Arksey as part of the Bentley settlement, and the Bentley Ward includes Arksey, further demonstrating the close functional relationship of the settlements. Arksey is therefore a sustainably located settlement, yet on the basis of its designation as a Defined Village alone, it is identified for no growth in the form of land allocated for development. The main developed areas of Arksey and Bentley lie within a quarter of a mile of one another and are effectively connected by development including industrial/warehouse, caravan site, and railway in between the two areas. PROPOSED CHANGE We continue to maintain that an adjustment to the settlement boundaries and categorisations is required to appropriately reflect the location and function of Arksey within the settlement hierarchy. This would be best achieved by the re-designation of the main urban area boundary and list of settlements incorporated to include Arksey given its location abutting Bentley. This would accurately reflect the locational and functional relationship of the settlements and the sustainability resulting from its proximity to Doncaster itself. In this case it would then be appropriate to consider land in and around the existing village to be allocated for housing development. Without the changes suggested above, we object to the distribution of housing proposed which directs no growth to such locations, we consider that growth in these locations is necessary to provide flexibility and choice in the housing offer. Policy 2 Spatial Strategy and Settlement Hierarchy (Strategic Policy) and Policy 3 Level and Distribution of Growth (Strategic Policy) should be amended to reflect this. The policy supporting text recognises that there may be opportunities to deliver sustainable proposals beyond the development limits of defined villages in the countryside to enhance or maintain the vitality of these rural communities. We consider that the Local Plan should allocate these sites, recognising the need to maintain the vitality of these communities. Site 829 represents one of these opportunities. Site 829, land north of Arksey Common Lane is presented in two parts as it is able to be developed in two phases, as indicated on the site location plan (attached). Part 1 of the site extends to approximately 5.25 ha with potential for development of c.105 dwellings. Part 2 extends to c.4 ha and could accommodate c.100 dwellings which could be allocated or safeguarded in the Local Plan for delivery towards the end of the plan period. Site 829 is considered to be a suitable, available and deliverable site for housing development in Arksey, a sustainably located settlement, which offers the potential for phased development of up to c.205 dwellings over the plan period. The allocation of Site 829 would provide for a mix of dwellings within the plan period, including affordable housing and public open space.

Summary:
Re Site 829 - land North of Arksey Common lane. o Site is classified as ‘Remaining sites at Defined Villages not considered capable of contributing towards Local Plan spatial strategy’ (Table A2.2 Local Plan) 1. Object to defined villages not being part of the housing distribution. 2. Arksey is inappropriately defined as a ‘defined village’. 3. Is distinctly different in function to other defined villages - it is well linked to the Main Urban Area (MUA). 4. Arksey is sustainably located settlement. 5. MUA boundary should be adjusted to include Arksey. 6. Policy 2 (spatial strategy and settlement hierarchy) and Policy 3 (level and distribution of growth) should be amended to reflect this. 7. Site 829 is considered ‘suitable’, ‘available’ and ‘deliverable’.

Response:
The Local Plan strategy is a result of consultation. The distribution has been derived from the results of the settlement audit. Arksey was not deemed sustainable or enough in its own right to warrant housing being allocated towards it, not is it part of the Main Urban Area, and is clearly physically separate. The Housing Topic Paper explains this, and sites are assessed in the Site Selection Methodology. Policy 2 and 3 do provide opportunities for some development to come forward within or adjacent to settlements in the countryside. It should be noted the site is in flood zone 3, where the Local Plan will not be allocating any sites.
We write on behalf of our client Bellway Homes to provide Doncaster Council (the Council) with further information in respect of the deliverability of their land interest at Doncaster Road, Branton which we would like to put forward as a housing land allocation within the emerging Doncaster Local Plan. We object to the site being rejected as a potential housing allocation within the Publication Draft Local Plan. It is our considered opinion that the site can deliver a comprehensive development of market and affordable housing alongside a number of community benefits to meet the needs and aspirations of the local area over the plan period. The development proposals are situated in a suitable and highly sustainable location in respect of existing settlement form and there are no technical or environmental (built and natural) constraints that would preclude the development of the site. As the previous version of the Local Plan didn’t propose to deliver any new homes to Branton, in our letter dated 26th October 2018 we raised concerns that the Council’s proposed approach would only result in the need for people to move away from the Village to seek a home to meet their housing needs. It would have the opposite impact that national planning guidance requires in respect of enhancing or maintaining the vitality of the Village. Accordingly, we have undertaken an independent assessment of the Village’s current and future housing needs in order to ascertain what is needed to ensure the sustainable growth of the settlement. The Housing Market Needs Assessment prepared by Huw Jones Consulting (July 2019) is enclosed and a summary of the key conclusions raised are provided within this letter. Our development proposals for the site have been revised to take into account the conclusions of the independent Housing Needs Assessment work. The proposals can deliver a residential development of at least 100 new homes, alongside a number of community benefits. This letter re-iterates the site’s planning, sustainability and deliverability criteria and is again supported by the following technical work: - Concept Masterplan 100 Homes - Pegasus Group - Concept Masterplan Approx. 200 Homes - Pegasus Group - Promotional Report - Pegasus Group - Transport Appraisal - White Young Green - Flood Risk & Drainage Review - White Young Green - Technical Ecology Report - Rachel Hacking Ecology (SEE EMAIL FOR Technical Reports) The Concept Masterplan and Promotional Report have been updated to present both the new proposed 100 home development option at the site and the previously proposed 200 home development option. Both of which can deliver the independently identified housing needs of the Village. The above submitted technical reports were prepared in respect of the previously proposed development of 200 homes at the site. Each of which confirmed that there were no constraints to the delivery of the site and indeed that the site could deliver a number of community facilities and environmental enhancements. The newly proposed option of delivering 100 homes at the site would still importantly deliver the same level of benefits as previously proposed. Whist we want to work alongside the Council to ensure the delivery of a sound Local Plan for Doncaster, we are concerned that unless changes are made to the Publication Draft Local Plan prior to its submission to the Secretary of State, it will not be in a position where it can be found sound in respect of the guidance provided in Paragraph 35 of the NPPF 2019

Summary:

The Representation is on behalf of Bellway Homes and objects to their site at Branton (Ref: 1018) not being allocated which can deliver market and affordable housing alongside other community benefits. The site is suitable and in a highly sustainable location with no constraints. Previously objected to Branton not being a settlement identified for allocations and will result in people having to leave the Village to seek their housing needs in homes elsewhere rather than enhancing or maintaining the vitality of the village in line with NPPF. Provides an assessment of the settlement’s housing needs (Report by Huw Jones Consulting July 2019). Development proposals have been revised to reflect this study with a scheme that can deliver at least 100 dwellings alongside community benefits. Provides the following technical reports: - Concept Masterplan 100 Homes - Pegasus Group - Concept Masterplan Approx. 200 Homes - Pegasus Group - Promotional Report - Pegasus Group - Transport Appraisal - White Young Green - Flood Risk & Drainage Review - White Young Green - Technical Ecology Report - Rachel Hacking Ecology The Concept Masterplan and Promotional Report have been updated to present both the new proposed 100 home development option at the site and the previously proposed 200 home development option. Both of which can deliver the independently identified housing needs of the Village. Concerned that unless changes are made to the Publication Draft Local Plan prior to its submission to the Secretary of State, it will not be in a position where it can be found sound in respect of the guidance provided in Paragraph 35 of the NPPF 2019

Response:

As explained in the Housing Topic Paper, Branton has not been identified as a settlement for housing to be allocated to. However, Policy 2 and 3 indicate that some development could come forward here subject to the caveats set out. Branton is close to larger settlements (including the Main Urban Area) where housing is being allocated, and so local needs can be met relatively close by in more sustainable settlements. The Settlement Audit assessed the service provision in Branton and found it not to be on the levels of settlements where housing is being allocated. The Site Selection Methodology explains the reasons sites have been included or excluded.
The site is located to the east of Branton, to the east of Doncaster Road and Whiphill Top Lane. The site currently consists of agricultural fields with landscape features located along the site’s northern, western and eastern boundaries. The site is bound to the north and west by existing residential development, to the south and east by Doncaster Road and open fields to the east. The site is currently designated within the Open Countryside and an Area of Special Landscape Value within the Doncaster Unitary Development Plan. It is important to state at this point that the size of any proposed development at the site can be commensurate with the number of homes required to meet the housing and community infrastructure needs of Branton. The topography of the site is relatively flat, meaning that in visual terms it is more closely related to the existing residential area of Branton when viewed from the south and the approach from Auckley. The site is located predominantly within Flood Risk Zone 1. There are areas of Flood Risk Zone 2 & Flood Risk Zone 3 on the site’s eastern and southern boundary, but any proposal would be designed to ensure that there would be no residential dwellings located in this area of the site. Vehicular, pedestrian and cycle access to the site can be taken from Doncaster Road and Whiphill Top Lane. The site is located within a sustainable location, within walking and cycling distance to a number of facilities and services located within Branton. The site is also within walking distance of a number of bus stops located along Doncaster Road. The site is located such that prospective residents will be provided with attractive opportunities for travel by sustainable modes. The Concept Masterplan enclosed with this letter identifies that the development of the site provides the opportunity to deliver the following: - A size, layout and configuration capable of supporting a sustainable housing scheme of at least 100 homes providing the ability to meet a range of housing needs including affordable housing. - The size of development at the site can be commensurate with the number of homes required to meet the housing and community infrastructure needs of Branton. - The site’s size can ensure the delivery of substantial benefits to the local area, benefits which a collection of smaller sites may not be able to match. - The opportunity to strengthen the eastern and southern boundaries of the site to deliver a more logical defensible boundary for the wider open countryside and protection from coalescence with Auckley in perpetuity. - The opportunity to deliver biodiversity enhancements through the provision of swales and surface water attenuation ponds within the development proposals. - The opportunity to deliver biodiversity enhancements through the provision of large areas of greenspace within the development proposals, particularly within the southern parcel of the site. - The opportunity to create a new community park along the entire eastern boundary, which will include a play area, community orchard and allotment to be used by the neighbouring residents. - The creation of a community centre to serve the neighbouring and surrounding local residents where they can gather for group activities, social support, public information, and other purposes. - Delivery of vehicular access from Doncaster Road. - The retention and enhancement of existing landscaping located on the site’s boundaries. - The creation of strong pedestrian and cycle links throughout the site and the existing/adjoining residential areas of Branton. - In terms of design, potential housing fronting onto Doncaster Road and Milton Road would be designed to enable the existing character of the Village to be maintained. The homes located along the northern/western boundaries of the site will be orientated to maximise views out of the site. (SEE EMAIL FOR Concept Masterplan) On account of the above, the proposed development of the site could achieve a high standard of design that protects and enhances the local area’s setting and character. It will also deliver significant community benefits to the Village. Finally, it would also ensure that there are no issues in respect of coalescence with Auckley. The enclosed nature of the site means that the openness of the wider open countryside would remain, and a new permanent boundary would be readily provided through an enhancement to the site’s existing landscape boundaries. Overall, we believe that the site can be considered a logical extension to the settlement area of Branton, with the site having the potential to be designed in a manner which will enable it to be largely enclosed on all sides.

Summary:
Provides a description of the site (agricultural fields) and current designation (Countryside Policy Area) and topography being flat so little visual impact. Predominantly FRZ1 and areas of FRZ2/3 will be avoided from built development. Access can be taken from Doncaster Road and Whiphill Top Lane. The site is suitably located for services including public transport. Provides a concept masterplan. The proposed development of the site could achieve a high standard of design that protects and enhances the local area’s setting and character. It will also deliver significant community benefits to the Village. Finally, it would also ensure that there are no issues in respect of coalescence with Auckley. The enclosed nature of the site means that the openness of the wider open countryside would remain, and a new permanent boundary would be readily provided through an enhancement to the site’s existing landscape boundaries.

Response:
Noted. The Local Plan is not seeking to allocate any sites in Branton, as set out in the Housing Topic Paper.
Based on the justification provided above it is considered that Bellway Homes' Doncaster Road, Branton development proposals will create a sustainable, high quality and accessible development which will provide significant social and economic benefits to Branton and the wider Doncaster area. It is our considered opinion that the site can deliver a comprehensive development of market and affordable housing alongside a number of community benefits to meet the needs and aspirations of the local area over the plan period. The development proposals are situated in a suitable and highly sustainable location in respect of existing settlement form and there are no technical or environmental (built and natural) constraints that would preclude the development of the site. The submitted technical reports confirm this to be the case. The proposed development of the site could achieve a high standard of design that protects and enhances the local area's setting and character. It would also ensure that there are no issues in respect of coalescence with Auckley. The site can be considered a logical extension to the settlement area of Branton, with the site having the potential to be designed in a manner which will enable it to be largely enclosed on all sides. Bellway Homes proposals represent a truly deliverable residential development site on account of it being suitable, available and achievable for residential development now. Branton should be defined as a "Service Town & Village" within the next version of the Doncaster Local Plan and accordingly, our client’s proposed development site at Doncaster Road, Branton should be included as a proposed housing allocation. The independent Housing Market Needs Assessment enclosed with this letter identifies that there is very strong evidence for new housing allocations to be identified in the Branton in the emerging Local Plan that can provide additional affordable housing options in the village and create a housing mix capable of sustaining the viability and vibrancy of the village into the future. Without additional new housing options in the village, it will be extremely difficult to attract new households, especially actual or potential families, to the village and remain in the village rather than have to move elsewhere to meet their housing needs, requirements and aspirations. There could also be difficulties in enabling older households needing to move to smaller properties in the village to do so, running the risk of further 'silting up' the housing chain in the area and frustrating necessary movement within the village. This in turn could threaten the viability of local facilities and amenities. Our development proposals for the site have been revised to take into account the conclusions of the independent Housing Market Needs Assessment work. The proposals seek to deliver at least 100 new homes, alongside a number of community benefits. If the Council's approach remains unchanged then the housing needs of the Village will not be met before 2035. Resulting in a negative impact on the vitality of the Village, including its services and facilities, contrary to the guidance presented in Paragraph 78 of the NPPF. Whilst we want to work alongside the Council to ensure the delivery of a sound Local Plan for the District, we are concerned that unless changes are made to the Publication Draft Local Plan prior to its submission to the Secretary of State, it will not be in a position where it can be found sound. In light of the guidance provided in Paragraph 35 of the NPPF 2019, we consider the following: - The Local Plan is not objectively assessed development and infrastructure requirements of Doncaster; - The Local Plan is not justifiable as there is compelling evidence available that it does not present an appropriate strategy for Doncaster, when considered against the reasonable alternatives, based on proportionate evidence; - The Local Plan is not effective as the evidenced and identified housing needs of Doncaster’s most sustainable Villages will not be met, resulting in the full objectively assessed housing needs of Doncaster not being met; & - The Local Plan is not consistent with national policy on account of the combined impact of the above factors when considered together. It will not deliver the sustainable development of Doncaster in the plan period. When each of the above points are considered holistically there is a compelling case for the release of additional land as housing allocations within future versions of the Local Plan in order to meet the District’s full objectively assessed housing needs. On account of the above we object to our client’s Doncaster Road, Branton site being rejected as a potential housing allocation within the Publication Draft Local Plan.

Summary:

Based on the justification provided it is considered that Bellway Homes' Doncaster Road, Branton development proposals will create a sustainable, high quality and accessible development which will provide significant social and economic benefits to Branton and the wider Doncaster area. The site can deliver a comprehensive development of market and affordable housing alongside a number of community benefits to meet the needs and aspirations of the local area over the plan period. The development proposals are situated in a suitable and highly sustainable location in respect of existing settlement form and there are no technical or environmental (built and natural) constraints that would preclude the development of the site. The submitted technical reports confirm this to be the case. There is a compelling case for the release of additional land as housing allocations within future versions of the Local Plan in order to meet the District’s full objectively assessed housing needs. On account of the above we object to our client’s Doncaster Road, Branton site being rejected as a potential housing allocation within the Publication Draft Local Plan.

Response: Site promotion noted, however as explained in the Housing Topic Paper and previous comments, no sites are being allocated in Branton, and the Borough can comfortably meet its housing requirement without releasing land here.
Tests of Soundness:

Comment:

Rachel Hacking Ecology have been commissioned by Bellway Homes Limited to provide a technical note regarding ecological constraints and opportunities associated with the development of the site. The technical note is enclosed with these representations. (SEE EMAIL FOR Ecology Technical Note) The note identifies that the habitats on the site are species-poor. The arable land offers limited ecological value. The mature trees and hedgerows are the most ecologically valuable habitats and these can be retained or easily mitigated for if lost. No rare or locally uncommon plant species or habitats exist on site. Great Crested Newt, [protected species] and bats are not considered to be a constraint on development, although it is recommended that the trees are checked for potential bat roosting habitat as part of a future planning application. Nesting birds can be mitigated for by avoiding disturbance to nesting sites within the bird nesting season or undertaking a bird nest check first. There is opportunity to bring significant biodiversity gain to the site and the locality by incorporating the following landscape features, some of which can be seen on the Concept Masterplan: - - Species-rich, native hedgerows along open boundaries, including plugging of any gaps within existing hedgerows. - Planting of native tree species on field boundaries. - Creation of wildflower grassland. - Provision of new ponds. The eastern edge of the allocation site extends into grazing marsh habitat, good examples of which are UK Priority Habitat. During the site visit, this was noted to be species-poor. It is recommended that the eastern part of the residential site provides good quality marshy habitat, such as wetland wildflower meadows. It is noted that attenuation ponds are designed into the eastern part of the site and these can be enhanced for wildlife with the provision of native, species-rich marginal planting. The eastern boundary of the site would, therefore, include a buffer habitat zone, to protect the remaining adjacent priority habitat and watercourses. The Concept Masterplan for the development proposals identifies that each of the proposed recommendations can be delivered to provide ecological and biodiversity enhancements to the area. (SEE EMAIL FOR Concept Masterplan) Future development should be undertaken with the implementation of a Construction Environmental Management Plan (CEMP), which will protect adjacent and retained habitats, and which will include, for example, a sensitive lighting scheme. The conclusions and recommendations provided within he submitted Ecology Technical Note confirm that there are no ecological issues that would preclude the development of the site for residential use.

Summary:

Rachel Hacking Ecology have been commissioned by Bellway Homes Limited to provide a technical note regarding ecological constraints and opportunities associated with the development of the site. The technical note is enclosed with these representations. The note identifies that the habitats on the site are species-poor. There is opportunity to bring significant biodiversity gain to the site and the locality. The Concept Masterplan for the development proposals identifies that each of the proposed recommendations can be delivered to provide ecological and biodiversity enhancements to the area. Future development should be undertaken with the implementation of a Construction Environmental Management Plan which will protect adjacent and retained habitats, and which will include, for example, a sensitive lighting scheme. The conclusions and recommendations provided within he submitted Ecology Technical Note confirm that there are no ecological issues that would preclude the development of the site for residential use.

Response:

Noted. The Local Plan is not seeking to allocate any sites in Branton, as set out in the Housing Topic Paper.
WYG have undertaken a High Level Flood Risk and Drainage Assessment of the proposed allocation site. The enclosed report identifies the following conclusions in respect of the potential development of the site:

- A review of all existing flood risks and consideration of how the site can be drained has confirmed that subject to complying with the relevant design guidance and policies and undertaking the identified further investigations, there are no identified flood risk and drainage constraints which would prevent the proposed development being allocated within the Local Plan;
- The Site is greenfield in flood risk terms. The Site levels fall from west to the north and east. The Site is bounded by an ordinary watercourse known as Common Drain to the east and by Old Mill Dike approximately 70m to the south east;
- The Site is shown on the EA Statutory Flood Maps for Planning as being predominantly within Flood Zone 1, partly in Flood Zone 2 and partly in Flood Zone 3. A review of the site contours suggests that the existing Flood 2 and possibly Flood Zone 3 area are suspect, and that site-specific hydraulic modelling is likely to reduce the extent of the flood zones within the site;
- A review of the existing flood risk has identified that the majority of the Site it is at low risk of fluvial, pluvial, surface water, groundwater, sewer and overland flow flooding. The northern and eastern parts of the site are shown as being at risk of flooding from the adjacent ordinary watercourses;
- The proposed development components are classified as 'More Vulnerable' in accordance with Table 2 of the PPG (Flood Risk & Coastal Change). Hence, according to Table 3 of the PPG, development within the FZ 1 part of the Site is considered acceptable in flood risk terms and not required to pass the Sequential and Exception Tests;
- The existing total greenfield Qbar discharge rate has been assessed as being 1.46 l/s per hectare; - If infiltration proves to be unfeasible, surface water runoff from the proposed development site can be discharged to the existing watercourses;
- In developing any future SUDS systems, it will be necessary to undertake a full site investigation study including permeability testing in accordance with BRE Digest 365 guidelines and ground water monitoring; - It is proposed to provide attenuation by means of a SUDS management train including possible options such as permeable paving, rain water butts, swales and detention basins located within the natural low points and any future masterplan should allow for the provision of such basins and means of access to maintain them; and - It is proposed to incorporate a fully compliant SUDS drainage design where deliverable and viable to drain the surface water runoff from the site and a more detailed assessment will be provided to support any future outline or detailed planning application. (SEE EMAIL FOR Flood Risk and Drainage Assessment) Further to the above, the enclosed report identifies the following recommendations should be taken account of in the proposed development of the site:
- A Flood Risk & Drainage Assessment will be required to support any future planning application.
- A full review and liaison with Severn Trent Water should be undertaken to assess the feasibility and viability of the off-site foul water drainage connection points. - The future surface discharge rate shall be restricted to the equivalent pre-development greenfield Qbar rate or any other rate agreed with either Doncaster MBC LFA or Severn Trent Water. - The final site layout and surface water drainage design including the required attenuation shall incorporate above ground SuDS system as much as practicable. Each of the identified recommendations will be fully taken into account in the progression of any future planning application at the site. The submitted Concept Masterplan has already taken into account the delivery of SuDS systems. Accordingly, there are no flood risk or drainage issues that would preclude the development of the site.

Summary:

WYG have undertaken a High Level Flood Risk and Drainage Assessment of the site. The enclosed report identifies the following conclusions in respect of the potential development of the site. Each of the identified recommendations will be fully taken into account in the progression of any future planning application at the site. The submitted Concept Masterplan has already taken into account the delivery of SuDS systems. Accordingly, there are no flood risk or drainage issues that would preclude the development of the site.

Response:

Noted. The Local Plan is not seeking to allocate any sites in Branton, as set out in the Housing Topic Paper.
White Young Green (WYG) have undertaken a transport appraisal to support the proposal for a residential development of up to 200 homes at the site. Whilst a second development option of at least 100 homes is now being proposed, the findings of the WYG work does of course confirm that a development of 100 homes would also not have an adverse impact on the local highway network. (SEE EMAIL FOR the Transport Appraisal) The appraisal confirms that a suitable and safe access to the site can be provided on to the B1396 Doncaster Road. The layout of the proposed junction is shown on drawing number A111155/21/T5/SK 001 Rev P1, which is enclosed within the document. The junction layout drawing shows a 5.5m wide carriageway with a 2.0m footway along each side and 6m kerb radii at the access junction. The junction also includes a priority ghost island arrangement which has been designed to meet the standard in the DfT’s DMRB TD 42/95. The proposed access junction falls within the 30mph section of Doncaster Road and, based on posted speed limits, the guidance recommends a 2.4m set back from the give-way line as the x-distance and a 43m distance along the y axis. However, given that the speed limit changes to 40 mph in close proximity to the junction, an extended y-distance of 63m to the left of the junction has been incorporated into the design. The appraisal identifies that it may be appropriate to extend the 30mph speed limit beyond the extents of the proposed site access junction. The available visibility from the proposed access is well in excess of that required by the Manual for Streets extending to 153m to the right and 153m to the left. In respect of accessibility, the appraisal confirms the position presented above, that Branton is a sustainable location for residential development, that the site is accessible within a reasonable walk or short cycle ride to the services and facilities available within the Village, and that there are public transport options available for journeys further afield to locations such as Doncaster With regards to Traffic Impacts, the appraisal identifies that the proposed development proposal is predicted to generate relatively small numbers of pedestrians, cyclists and public transport trips. Improvements beyond providing connections to the external networks are unlikely to be needed. The numbers of additional vehicles would trigger a Full Transport Assessment for planning, and it is expected the local road network would be able to accommodate the extra traffic. The enclosed appraisal concludes that the development site satisfies the key issues considered in this appraisal and is therefore considered suitable, in transportation terms, for residential development.

Summary:
White Young Green have undertaken a transport appraisal to support the proposal for a residential development of up to 200 homes at the site. Whilst a second development option of at least 100 homes is now being proposed, the findings of the WYG work does of course confirm that a development of 100 homes would also not have an adverse impact on the local highway network. The appraisal confirms that a suitable and safe access to the site can be provided on to the B1396 Doncaster Road. In respect of accessibility, the appraisal confirms that Branton is a sustainable location for residential development, that the site is accessible within a reasonable walk or short cycle ride to the services and facilities available within the Village, and that there are public transport options available for journeys further afield to locations such as Doncaster

Response:
Noted. The Local Plan is not seeking to allocate any sites in Branton, as set out in the Housing Topic Paper.
In accordance with the definition provided within Annex 2 of the revised National Planning Policy Framework, we believe that the site can be considered as a Deliverable residential development site on account of:-  

**Suitability** The site is located in a suitable location for residential development now. As identified above, a sustainable development can be delivered at the site with pedestrian and cycle access to existing services, facilities and public transport. A suitable access can be provided from existing highways and there are no technical constraints which would preclude the development of the site for residential use.  

**Availability** The site is available for development now. The site is available for residential development as there are no legal or ownership constraints as Bellway Homes have an interest in the site and by virtue of this and previous submissions are expressing an intention to develop the site for residential use.  

**Achievability** A viable housing development can be delivered on the site within the next 5 years. Bellway Homes are seeking to develop the site for residential use. Prior to the progression of development sites they undertake a thorough marketing and economic viability assessment for each site, including an assessment of any site specific abnormal costs. The site is considered to be achievable for residential development now as there is a realistic prospect that the site can deliver new homes within the next 5 years.  

**Deliverability Conclusion** The site can be considered a deliverable residential development site and its release would deliver significant economic and social benefits in the form of: - Construction Investment to the area; - Creation of direct & indirect employment opportunities; - A mix of homes to deliver identified housing needs; - Social infrastructure investment to the area through S106 contributions; - Increased expenditure from residents to the area; and - Council Tax payments & New Homes Bonus payments which will help to sustain Council services.

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**Response:**

Noted. The Local Plan is not seeking to allocate any sites in Branton, as set out in the Housing Topic Paper.
1.1 These representations have been prepared in response to the Doncaster Local Plan Publication Version Consultation. 1.2 These representations are made on behalf of the Frickley and Warmsworth Estate who have landholdings in and adjacent to Clayton. 1.3 This statement seeks to provide comment on the Publication Version of the Local Plan and support the Council in preparing a sound document.

Summary:
Reps are provided on behalf of Frickley & Warmsworth Estate in respect to their landholdings at Clayton.

Response:
Noted
2.23 This policy sets out the basic approach to the identification and release of sites in the later parts of the Plan. In paragraph 4.44 it states that the new urban edge allocations have of necessity required land previously designated in the UDP as Green Belt or Countryside; and resulted therefore in amendments to town and village development boundaries to create new defensible boundaries. 2.24 This process however has not been undertaken in an appropriate manner as it has omitted sites which clearly represent reasonable alternatives to the selected allocations. As such the assessment of the impact on the Green Belt of these proposed allocations dealt with collectively under Policy 6 then individually in Tables H1, H2 and H3 which are set out in detail in Chapter 16 has not been undertaken on a sound basis. 2.25 The approach to the assessment is described in detail in Appendix 1 of this objection. Our objection to the selected housing and mixed use allocations which are to be removed from the Green Belt is that the assessment of the impact of removing these sites from the Green Belt and their subsequent development is unsound. This based on the fact that the approach assessed sites in an inappropriate manner which failed to take into account the nature and impact of the sites being considered for release. 2.26 In the case of Brodsworth Quarry the impact of the Green Belt was assessed as part of a much larger site of some 481 hectares which did not share the same Green Belt characteristics as the Quarry itself. If the redevelopment of the Quarry only was to be assessed then the impact of the Green Belt would be considerably different. This is illustrated by our assessment of the Green Belt function of the Brodsworth Quarry site in Appendix 1. Recommendation 2.27 The Local Plan should be updated to reflect the housing requirement of 1,073 dwellings per annum for the plan period to 2035. 2.28 Brodsworth Quarry should be removed from the Green Belt and identified as a location for mixed use development. Justification 2.29 For the reasons set out above and within the appended SPRU report, it is correct to accommodate growth based on meeting requirements under the full assessment of jobs-led growth (1,073 dpa) for the full plan period to 2035 and for a new allocation to be made at Brodsworth Quarry to assist in meeting this requirement in the most sustainable way.

Summary:

Summary of Policy 3 including saying that new urban edge allocations are either Green Belt or Countryside thus creating new defensible boundaries to towns and villages. However this process had not been undertaken in an appropriate manner as it omits reasonable alternatives. The assessment of the impact on the Green Belt (under Policy 6 and then in Tables H1, H2 and H3) has not been undertaken on a sound basis. Our objection is that the assessment of the housing and mixed use allocations which are to be removed from the Green Belt is unsound. The approach has assessed sites in a manner which fails to take account the nature and impact of the sites being allocated. Regarding Brodsworth Quarry, the impact on the Green Belt was assessed as part of a much larger site of some 481 ha which do not share the same Green Belt characteristics as the Quarry. If the Quarry was assessed on its own then the impact on the Green Belt would be considerably different. The Local Plan should be updated to reflect the housing requirement of 1,073 dwellings per annum for the plan period to 2035. Brodsworth Quarry should be removed from the Green Belt and identified as a location for mixed use development. The supporting appendix provides a more detailed assessment of Brodsworth Quarry against the five Green Belt purposes. Purpose 1: To check the unrestricted sprawl of large built-up areas - The removal of this site from the Green Belt for residential purposes would result in a minor extension of the built up part of the settlement, but it would not undermine the area. The remaining land surrounding the site will still perform this function as the scale of this release and its well defined visual boundaries would not result in unrestricted sprawl. Part of the site is contiguous to Highfields, and is in close proximity to the Adwick and Woodlands settlement - it is considered reasonable to score the site as 2 again purpose 1. Purpose 2: To prevent neighbouring towns from merging into one another - The site, Brodsworth Community Woodland and Highfields Country Park separate Highfields and Woodlands. There is significant tree coverage. The remainder of the general area has a very limited role in preventing neighbouring towns from merging. Some additional development away from the road which would not risk merging settlements. The allocation of this site for development would involve a rounding off within the settlement edge. It is considered reasonable to score the site as 1 against this sub-criteria of purpose 2. Purpose 3: To assist in safeguarding the countryside from encroachment - There is established vegetation around the perimeter of the site that provides a degree of physical separation from the wider landscape. Additional landscape buffers can be provided to ensure development does not undermine the Green Belt. The removal of this site from the Green Belt for residential development would not detract from the character of the town or undermine the environmental value of the landscape. It is considered fair to score the site as 2 (moderate to low). Purpose 4: To preserve the setting and special character of historic towns - There are no views to the historic core of Doncaster from the Green Belt area associated with this site. The assessment of the specific site is therefore 1. Purpose 5: Approach to defining the extent to which Green Belt 'assists in urban regeneration, by encouraging the recycling of derelict and other urban land' - The Stage 1 Review report lists a number of regeneration priority areas, which includes Adwick le Street / Woodlands which is directly north of the site beyond the tree belt. As the tree belt is not within the site's red line boundary, it is considered that the site is located in close proximity to the regeneration priority area (Adwick le Street / Woodlands) but the Green Belt designation of this site itself is not fundamental to the delivery of urban regeneration priority area projects. It is considered reasonable to score the site as a 1.
The Green Belt Review has assessed sites on a consistent basis using a methodology agreed with other local authorities. Site 184 was not assessed within this as there is no housing allocation in Brodsworth and therefore no need to assess Green Belt that would not be released in any eventuality. This is based on the Settlement Hierarchy which was the result of consultation on the spatial strategy.

The site is proposed to be located within the Green Belt and outside of the settlement boundary for Marr. Following approval of the application reference 17/02585/FULM and 17/02586/LBCM, the settlement framework boundary of Marr should be updated to reflect the approved scheme and remove land as shown in plan (Page 1 of letter) from the Green Belt. This is in order to provide a new defensible boundaries to the Green Belt.

Response:
There is no notable change on the ground that warrant the removal of this site from the Green Belt, despite the extant permission. There are no exceptional circumstances at this time to amend the Green Belt boundary here.
The site is located to the north of Stainton, off Limekiln Lane and is circa 0.8 hectares in size. The land is a greenfield site currently used for agriculture and is generally flat in topography albeit slightly undulates from the north-western corner to the south-eastern corner of the site. Existing residential development is located to the South and West of the site with an agricultural steading located to the East and agricultural land located to the North. The land is under a single private ownership and whilst subject to a tenancy, the tenancy can be terminated for development purposes and therefore the development potential is available immediately. There are trees and hedgerows located along the boundary of the site but this would not be a constraint to development. The existing trees and hedgerows could be easily accommodated within a future residential development scheme. (See EMAIL FOR Figure 6 Aerial Photograph of the site and its surroundings) Access would be off Limekiln Lane which runs along the sites southern boundary and is within a 30mph speed limit zone. There are no existing footpath located within or near the site and the site is not subject to any scheduled ancient monument’s or heritage assets. The site is located within Flood Zone 1 although there is higher risk associated with Ruddle Dike to the south of the site. See Figure 14 below for extracts from the Flood Risk Map for the area. (See EMAIL FOR Figure 7 Extract from the Governments Flood Risk Map - From Rivers and Sea) In conclusion, there are no known physical or technical restrictions to bringing the site forward for development. The only constraint to bringing the site forward for development in the short term is that the site is currently designated as Green Belt. Notwithstanding this, the site is considered a suitable to accommodate future housing development to meet the objectively assessment housing need for the Borough over the next 17 years. The site does not comply with all of the five purposes of the Green Belt as outlined at paragraph 134 of the NPPF. We therefore respectfully request that this site (Land to North of Limekiln Lane, Stainton - HLEAA Reference 358) is deleted from the Green Belt and identified as a housing allocation in the next draft of the Local Plan. Based on a 75% developable area, it is considered that the site could accommodate circa 10-20 new dwellings. In conclusion, we request that Land to North of Limekiln Lane, Stainton be deleted from the Green belt and included within the defined village boundary for Stainton, so that it can accommodate suitable residential development, as part of the Doncaster Local Plan going forward. A site location plan is provided in Appendix A. The Sandbeck Estate welcome discussions with the Council should they want to include some or all of the site within the defined village boundary for Stainton. A proposed redefined village boundary for Stainton is also provided in Appendix B to include land at Manor Farm and land North of Limekiln Lane for residential development. There are a number of settlements located in close proximity to Stainton which are listed below: - Maltby (3.2km South West); - Tickhill (5.1km East); - Bramley (8.2km West) Proposed residential development at Stainton complies with the NPPF, at paragraph 78, which states that "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby." It is considered that the residential development of these sites will comply with paragraph 78 of the NPPF whilst helping to meet the OAN for the Borough. (See EMAIL FOR Appendices)

Summary:
Site 358 ("Land north of Limekiln Lane, Stainton ") should be allocated for housing. It is identified as a deliverable / developable sites in the HELAA and therefore has no physical or technical reasons as to why it could not come forward for residential development (the only constraint being that the land lies within Green Belt). The only constraint in the short term is that the site is currently designated as Green Belt. The site does not comply with all of the five purposes of the Green Belt as outlined at paragraph 134 of the NPPF. There are a number of settlements located in close proximity to Stainton (Maltby; Tickhill; and Bramley). Proposed residential development at Stainton would comply with NPPF, paragraph 78, which states that "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby." It is considered that the residential development of these sites will comply with paragraph 78 of the NPPF whilst helping to meet the OAN for the Borough.

Response:
The site is Green Belt and not in a location where the Local Plan will seek to make housing allocations, as set out in the Housing Topic Paper. In order to satisfy the requirements of para. 78, Policy 2 and 3 do provide opportunities for development to come forward in rural locations subject to caveats, however in Green Belt locations such as this national policy will apply.
The Site is located to the south of Stainton, off Scotch Spring Lane and is circa 1.5 hectares in size. The land is a greenfield site currently used for agriculture and is generally flat in topography. Existing residential development is located to the North and East of the site with agricultural land located to the South and playing fields to the West. The land is under a single private ownership and whilst subject to a tenancy, the tenancy can be terminated for development purposes and therefore the development potential is available immediately. There are trees and hedgerows located along the boundary of the site but this would not be a constraint to development. The existing trees and hedgerows could be easily accommodated within a future residential development scheme. (SEE EMAIL FOR Figure 3 Aerial Photograph of the site and its surroundings)

Access would be off Scotch Spring Lane rather than School Lane. Scotch Spring Lane runs along the sites western boundary. There are no existing footpath located within or near the site and the site is not subject to any scheduled ancient monument’s or heritage assets. The site is located within Flood Zone 1. See Figure 11 and 12 below for extracts from the Flood Risk Map for the area. (SEE EMAIL FOR: Figure 4 Extract from the Governments Flood Risk Map - From Rivers and Sea Figure 5 Extract from the Governments Flood Risk Map - From Surface Water Flooding) In conclusion, there are no known physical or technical restrictions to bringing the site forward for development. The only constraint to bringing the site forward for development in the short term is that the site is currently designated as Green Belt. Notwithstanding this, the site is considered a suitable to accommodate future housing development to meet the objectively assessment housing need for the Borough over the next 17 years. The site does not comply with all of the five purposes of the Green Belt as outlined at paragraph 134 of the NPPF. We therefore respectfully request that this site (Land at Manor Farm, Stainton HLEAA Reference 359) is deleted from the Green Belt and identified as a housing allocation in the next draft of the Local Plan. Based on a 75% developable area, it is considered that the site could accommodate circa 30-35 new dwellings. In addition to being deleted from the Green belt it is considered that the site is also included within the defined village boundary for Stainton, so that it can accommodate suitable residential development, as part of the Doncaster Local Plan going forward. A site location plan is provided in Appendix A. The Sandbeck Estate welcome discussions with the Council should they want to include some or all of the site within the defined village boundary for Stainton. (SEE EMAIL FOR Appendix)
Tests of Soundness:

Comment:

(This rep is for this this site only - see other reps for other two sites) 6.34. Avant Homes objects that no housing allocations are identified in Wadworth and that HELAA Site 871 has not been considered. Wadworth is a large village with services and facilities located close to the southern edge of Doncaster. The settlement can therefore accommodate some new housing and should also be positioned further up the settlement hierarchy. Furthermore, opportunities for growth at Tickhill from the Site Options currently considered appear limited with sites rejected due to site constraints. Tickhill and Wadworth are in relative close proximity and have good linkages and therefore the settlements work together. Wadworth is also well related to Doncaster Main Urban Area and the Main Urban Area is accessible via a range of sustainable transport modes. Notwithstanding that there should be allocations in smaller settlements which serve a wide hinterland. Particularly where this will enhance or maintain or enhance the vitality of rural communities. Paragraph 78 of the Framework indicates that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Avant Homes therefore proposes that their site at Wadworth Hill, Wadworth (HELAA Site 871) be allocated for housing. 6.35. Avant Homes considers the proposed housing allocation is available, suitable and achievable and is therefore in accordance with the Framework a deliverable site able to come forward in the short term. 6.36. The deliverability and benefits of the Wadworth Hill, Wadworth site are contained within the attached advocacy report and delivery statement submitted alongside these representations. (SEE EMAIL FOR document) Proposed Change 6.37. To overcome the objection and address soundness matters, the Council should: - Allocate: o HELAA Site (871): Wadworth Hill, Wadworth

Summary:

Object to the fact that no housing is proposed in Wadworth and that site 871 has not been considered. Wadworth is a large village with services and facilities located close to the southern edge of Doncaster. It can accommodate new housing and should be further up the hierarchy. It could also offset the lack of sites in nearby Tickhill (close proximity and good links). Wadworth is also well related to the main urban area and accessible via a variety of nodes. Notwithstanding this, there should be allocations in smaller settlement to serve the rural hinterland, particularly where they will enhance or maintain the vitality of rural communities (para. 78 NPPF). The site is available, suitable and achievable and therefore in accordance with the framework and can come forward in the short term. To overcome the objection and address soundness matters, the council should allocate site 871. Advocacy document attached.

Response:

Wadworth has a small population compared to other larger settlements and also does not score especially well in the Settlement Audit. It is not appropriate to allocate this village for housing, as set out previously in the Settlement Strategy and as also shown in the Housing Topic Paper. A range of more sustainable villages are being allocated, however, and Policy 2 allows infill within Green Belt village such as this, whilst national Green Belt policy applies outside of the village.
6.1. Avant Homes objects to Policy 6 and the proposed distribution of housing and that the following sites are not proposed allocations: - Site 494: Green Lane, Scawthorpe - HELAA Site 1036: Melton Road, Newton - HELAA Site (871): Wadworth Hill, Wadworth 6.2. These sites are summarised below and technical information and advocacy reports will be submitted shortly. Test of Soundness 6.3. Avant Homes considers that the Local Plan is currently unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy  Justification 6.4. Avant Homes is concerned that the Local Plan is not producing sufficient homes across the Borough. Further to comments in relation to Policy 3 Avant Homes recommends that further sites are identified to meet and exceed the requirement but also to provide a sufficient buffer to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the Framework requirements for the plan to be positively prepared and flexible. 6.5. Avant Homes is concerned that the proposed distribution of new homes does not reflect the spatial strategy, but importantly does not address the focus for economic and housing growth across the Sheffield City Region and Yorkshire and Humber as a whole. 6.6. The proposed distribution against the Council's own targets shows a deficiency and a significant under provision in: - Doncaster - Adwick - Conisborough - Denaby - Mexborough - Thorne - Moorends - Sprotbrough - Tickhill - Bawtry 6.7. Avant Homes, as explained in response to Policy 2 and the spatial strategy considers that the spatial strategy is incorrect, that it does not provide for the growth of the Borough and does not reflect the role, function and location of the settlements. 6.8. Avant Homes, as explained in response to Policy 2 and 3, considers that there needs to be further provision of housing and a slightly amended approach to the spatial strategy, which focusses growth towards Doncaster. There should be further growth of Rossington to address regeneration and the provision of new infrastructure. There should be growth in Thorne-Moorends, and a regeneration focus in Carcroft-Skellow which should elevate the status of the settlement commensurate to its role and function. New housing should be provided in Tickhill to address the current under provision. Wadworth should accommodate some new housing to reflect its role and function and provision should also be made in the villages to address the rural economy. 6.9. Avant Homes is particularly concerned that there is an under provision of housing in Doncaster, which the spatial distribution, established in policy 2, suggests should be accommodating at least 50% of new homes. This would equate to 9200 Homes based on the requirement of 18400. The total permissions and allocations in Doncaster equate to 7441 homes (not accounting for completions). This is significantly short of that requirement for Doncaster, further the main urban area is identified as the focus for economic and housing growth and should be accommodating more housing. 6.10. Further Avant Homes are concerned about the deliverability of a number of allocations within the main urban areas. These include but are not limited to the following sites: 6.11. Further Avant Homes object to the allocation of site 838, which whilst benefiting from an extant permission the Residential Land Availability Report 2018 indicates that there are no completions on site and the site is not currently being developed. Further the council have been unable to produce any further deliverability information to support its inclusion within the Doncaster 5 Year Deliverable Housing Land Supply Statement. As a minimum the forecast contribution to the local plan should be reduced. 6.12. Avant Homes object to the allocation of site 843. Avant Homes consider that the delivery rates for this site are unrealistic based on performance at the site. The Residential Land Availability Report states that completions for the last year amounted to 39 dwellings. The local plan is suggesting a delivery rate of 70 dwellings per year. This is significantly over what has been achieved at this site or indeed other sites in Doncaster according to data in the residential land availability report. 6.13. Avant Homes consider that the delivery rates for this site are unrealistic. The Local Plan indicates that this is an outline permission. There are significant constraints, it is a brownfield site that is entirely within Flood Zone 3. However the Local Plan is assuming a delivery rate of 56 dwellings per annum in the first five years and 64 dwellings per annum in year 6-10. This is overly optimistic, and not consistent with the planning status, constraints and likely viability issues associated with site. 6.14. Based on the above it is clear that the deliverability and delivery rates of some of the sites in Doncaster ought to be reviewed to ensure that they reflect the site specific circumstances. Further allocations are required in Doncaster to ensure that the Plans strategy can be delivered. 6.15. As indicated in response to Policy 2 Avant Home are also concerned that the Plan does not provide sufficient support for development in Defined Villages. Avant Homes consider that in line with the provision of the Framework, paragraph 78, which is clear that to promote sustainable development in rural areas, 'Housing should be located where it will enhance or maintain the vitality of rural communities. Planning Policies should identify opportunities for villages to grow and thrive, especially where this will support local services'. 6.16. Furthermore, there does not appear to be any safeguarded sites identified within the Local Plan This is concerning given Policy 6 states that the Plan will designated Reserve Development Sites, yet those identified are not considered to be deliverable within the Plan Period due to significant constraints relating to flood risk and HS 2 Safeguarding, thus could not be relied on to maintain the supply of housing should other sites fail to deliver in the Plan period. As indicated in response to Policy 3 Avant Homes suggest that safeguarded sites be proposed, to provide additional flexibility in accordance with national guidance. 6.17. Avant homes consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 6.18. However, Avant Homes consider that with the proposed allocations and the deletion or adjustment in anticipated delivery within the plan period of sites 838, 843, and 984 that the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 6.19. To overcome the objection and address soundness matters, the Council should 6.20. Avant Homes consider that the following sites should be deleted or the yield within the plan period
Object to policy 6 and the proposed distribution of housing, and that the following sites are not allocated: - Site 494: Green Lane, Scawthorpe - HELAA Site 1036: Melton Road, Newton - HELAA Site (871): Wadworth Hill, Wadworth

The Local Plan is not producing sufficient homes for the borough. Further to comments on Policy 3, further sites should be identified to meet and exceed the requirement and provide a suitable buffer to deal with any under delivery which is likely to occur from some sites. This ensures the plan is positively prepared and flexible. The distribution does not reflect the spatial strategy, but importantly does not address the focus for economic growth in the SCR and Yorkshire and the Humber as a whole. There is a deficiency and under provision in Doncaster; Adwick; Conisbrough - Denaby; Mexborough; Thorne - Moorends; Sprotbrough; Tickhill and; Bawtry. The plan does not provide for the growth of the borough and does not reflect the role, function and location of settlements. Further housing is needed and an amended approach to the spatial strategy too. There should be further growth of Rossington to address regeneration and provide new infrastructure, as well as growth in Thorne - Moorends, and regeneration focus in Carcroft - Skellow should elevate the settlement to a Main Town. New housing should be provided in Tickhill as there is under provision here. Wadworth should accommodate some housing to reflect its role and function and provision should be made in the villages to address the rural economy. 9,200 new homes should be in the urban area according to Policy 2 and a total of 18,400 homes over the plan period. The total is 7,441 which is significantly short of this requirement. The urban area is identified as a focus for economic and housing growth and should accommodate more housing. There is also concern about deliverability in this location. Object to the allocation of 838 as the RLA indicates no completions and the site is not currently being developed. There is no information to support it in the 5 year supply statement. As a minimum the forecast contribution should be reduced. Object to the allocation of site 843 as the delivery rates for the site are unrealistic. Completions 17/18 were only 39, but 70 per annum is suggested - over what has been achieved on this and other sites. Object to the allocation of 984 as the delivery rates are unrealistic and the site is brownfield in flood zone 3 but assumes 56dpa in the first 5 years and 64dpa thereafter. Likely to be viability issues also. Further allocations are therefore required and delivery rates reviewed. There is not sufficient support for defined villages, opportunities should be identified for housing in these, especially when it will support local services in accordance with NPPF para. 78. There should also be safeguarded land identified. The policy is not justified or consistent with the framework and the Local Plan is therefore not sound - however with the proposed deletion or delivery adjustment for sites 838, 843 and 984, the plan can be found sound. Proposed change: delete or reduce the yield of 838, 843 and 984 and allocate 494, 1036 and 871.

Response:

As set out in the Housing Topic Paper, a buffer of additional sites is unnecessary as the housing calculations do not factor in a number of additional sources of supply, such as windfalls, small sites of 1 - 4 units, housing delivering beyond the plan period and the prospect of additional housing at the airport (amongst other sources). These thus create a buffer. Aside from Mexborough, the Main Urban Area and all the Main Towns mentioned are only short against the top of their ranges. As the Housing Topic Paper explains, not all of these settlements need to meet the top of their range, as long as the overall number balances out at approx. 90% of housing in these two areas, which it does. In Bawtry and Sprotbrough the shortfall against the target is relatively small and in Tickhill there are no other suitable sites. Policy 2 and 3 allow for some potential development in the defined villages, but no allocations are to be made in the Defined Villages. However, overall the borough is delivering enough housing across the plan period, and shortfalls are made up for in other areas. There is focus on the Main Urban Area, with over 50% of housing being delivered here between 2018 - 33. The Housing Topic Paper and Site Selection Methodology justify the approach to housing distribution and assess why sites have been omitted or included. Figures are related to allocations and not the total plan period supply, and in this case the Main Urban Area is delivering above 50% of the boroughs total allocations. The Council demonstrate three years of completions 2015 - 18 and supply for the final two years 2033 - 35. Matters of build outs and any relevant delivery amendments are covered in the Site Selection Methodology.
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**Comment:**

We welcome the requirement to retain views of the Grade II Listed Church of St Peter over this site from Cedar Road.

**Summary:**

'Sound'. We welcome the requirement to retain views of the Grade II Listed Church of St Peter over this site from Cedar Road.

**Response:**

Support welcomed
Comment:

Description 6.1 Cropmarks recorded within Site 436 and surrounding areas by the Historic England Magnesian Limestone Aerial Photographic Mapping Project are shown on Figure 3. These record a probable Iron Age to Roman settlement enclosure, trackway and fragmentary field boundaries within the northern field of Site 436 to the south of the Roman Ridge Roman Road. The trackway appears to extend southwards into the middle field. 6.2 Given the extensive nature of the Iron Age to Roman cropmark landscapes recorded elsewhere across the Magnesian Limestone, there is potential that similar remains could be present throughout Site 436, including underlying the medieval village earthworks and possibly westwards into Scawsby Leys. However, evaluation undertaken in advance of the new development on land adjacent to Emley Drive, immediately adjacent to the south side of the Roman Ridge and the north-east corner of the site (Plate 9), did not identify any archaeological remains (ArcHeritage Archaeological Scoping Assessment Event ESY 525). This suggests that, as indicated by the cropmark evidence, density will be variable. 6.3 Modern cultivation will have caused some truncation of sub-surface deposits but, as stated within the Archaeological Scoping Assessment (ArcHeritage 2017), the potential for survival of buried archaeology below the plough zone is likely to be moderate to high. Settlement, burial and industrial remains are likely to be considered of regional importance, whilst most sections of trackways and field boundaries would probably be of local importance. Potential impact 6.4 Development within the north and middle fields will impact on the below ground archaeological remains relating to this Iron Age to Roman landscape and result in their damage or destruction. Mitigation 6.5 It is considered that the presence of the cropmarks in Site 436 should not represent an absolute constraint on development. As can be seen from Figure 3, similar cropmark features have been recorded across much of the Magnesian Limestone and, as with many similar sites on the Magnesian Limestone, this impact could be effectively dealt with through a staged programme of archaeological investigation. 6.6 This would comprise a pre-determination evaluation (geophysical survey and possible trial trenching) to determine the density, nature and significance of remains (NPPF, para. 189). The results of this work would be taken into account during development design to enable the opportunity to design out sensitive or significant impacts where feasible, and to agree a programme of investigation in advance of, or during, development where impact is unavoidable. If appropriate, these proposals could be set out in a Heritage Design Brief submitted as part of a planning application and secured through condition. 6.7 This approach would be in compliance with NPPF paras 189, 197, 199, 54.

Summary:
See overall rep summary 01937/8/008

Response:
See response to comment ref 01937/8/008
1.1 Doncaster Council is consulting on an emerging Local Plan. This report has been prepared in support of a submission by Lichfields, on behalf of Theakston Estates, that requests Doncaster Council to reconsider their position in relation to Site 436 Land at Scawsby Lane (Map 10) and allocate the site for residential development. Archaeological constraints related to both designated and non-designated sites have been cited as being one of the key considerations for not allocating the site. 1.2 A detailed assessment of the archaeological constraints relating to this site is set out in the sustainability appraisal report Archaeology Scoping Study of Site Allocations for Doncaster Local Plan, Appendix Part 6 (ArcHeritage 2017). This appraisal has identified Site 436 as having a major archaeological constraint on allocation due to potential for impact on the following three sites: - Roman Ridge Roman Road, a Scheduled Monument (ID 1003672; SMR 03039/01); - earthwork remains of Scawsby deserted medieval village (DMV) (SMR 00452/01); and - cropmark features relating to a probable Iron Age to Roman enclosure, trackway and field system (SMR 04935). 1.3 Northern Archaeological Associates Ltd (NAA) has been engaged to review the evidence base for rejection on archaeological grounds and to advise Lichfields whether it would be possible to effectively mitigate the archaeological impacts of developing the site, such that any harm can be avoided or reduced to less than substantial. As part of this review, a site visit was undertaken on 11 October 2018. 1.4 This report sets out the results of the review findings and recommendations for potential mitigation. The Council is requested to take these into account when balancing the impact on both designated and non-designated archaeology sites against the public benefit of residential development (NPPF para. 196 and 197; MHCLG 2018).

Summary:
Representations by Lichfields on behalf of Theakston Estates and Site Ref 436 - Scawsby Lane requesting DMBC reconsiders its position and allocates the site for housing. Archaeology report has been prepared to support the site submitted by Theakston Estates by Northern Archaeological Associates to review the evidence for rejection and advise the applicant on any mitigation possibilities. It is requested the Council take the findings of this report into account.

Response:
Request noted. The Council has carefully considered site options in this location, including this site and other adjacent sites, but is not proposing to allocate any.
Comment:

3.1 Allocation Site 436 lies on the north side of the busy Barnsley Road and to the east of Scawsby Lane. It comprises three fields each with different archaeological constraints (Figs 2 and 3): North and middle fields: under arable cultivation - Roman Ridge Roman Road (ID 1003672). The Roman road is demarcated by the bridleway that runs along the northern boundary of Site 436. This section of the road is designated as a Scheduled Monument; therefore, impact on setting and potential for physical impact on the road or associated remains will be a significant consideration. - Cropmarks record enclosure, trackway and field boundaries (SMR 04935). These are indicative of Iron Age to Roman settlement and agricultural remains being present throughout both the north and middle fields. These remains are unscheduled and according to the Archaeological Scoping Assessment, are of local to regional importance, depending on nature and state of survival. South field: under pasture - This field contains the earthwork remains of Scawsby deserted medieval village (SMR 00452/01), which may have historic associations with the 17th-century Grade II listed Scawsby Hall on the south side of Barnsley Road. 3.2 Scawsby Leys is a large arable field (blue boundary) to the west of Scawsby Lane and opposite Allocation Site 436. If Site 436 were to be developed, it is proposed that this area could provide an area of Community Parkland. There are no recorded archaeological constraints, but the area has potential for unrecorded Iron Age to Roman remains, and possibly medieval remains associated with Scawsby DMV.

Summary:
See overall rep summary 01937/8/008

Response:
See response to comment ref 01937/8/008
2.1 The legal and main planning context relevant to the allocation of this site for residential development within the emerging Local Plan comprise: - the Ancient Monument and Archaeological Areas Act 1979; and - the National Planning Policy Framework (NPPF) (MHCLG 2018). Ancient Monument and Archaeological Areas Act 1979. 2.2 The Ancient Monument and Archaeological Areas Act 1979 sets out the statutory regime for the protection of scheduled monuments. Once a monument is scheduled, any works to it, and flooding and tipping operations that might affect it, require scheduled monument consent from the Secretary of State. 2.3 The Act makes no provision to protect the setting of a scheduled monument. National Planning Policy Framework (NPPF). 2.4 The NPPF sets out the Government’s planning policies for England and how these are expected to be applied. At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development (para. 11). Achieving sustainable development means that the planning system has three overarching objectives (economic, social and environmental). These objectives are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives) (para. 8). The environmental objective is to contribute to protecting and enhancing our natural, built and historic environment (para. 8c). 2.5 Paragraph 9 states that the three objectives should be delivered through the preparation and implementation of plans and the application of the policies in the NPPF; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances in account, to reflect the character, needs and opportunities of each area. 2.6 The preparation and review of all Plan policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals (para. 31). 2.7 Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options that reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be considered (or, where this is not possible, compensatory measures should be considered). 2.8 Paragraph 54 states that local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. 2.9 Policy 12 addresses the importance of good design of new structures and features in relation to the pre-existing environment. Paragraph 127 requires that any development be ‘sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change’. 2.10 Policy 16: Conserving and enhancing the historic environment sets out the framework for local planning authorities to make informed decisions on developments that affect heritage assets. Paragraphs 184-202 set out the information requirements and policy principles in relation to heritage assets. The following are of particular relevance to consideration of the allocation of Site 436. 2.11 Paragraph 185 states that Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk at time through neglect, decay or other threats. This strategy should take into account: a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation; b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; c) the desirability of new development making a positive contribution to local character and distinctiveness; and d) opportunities to draw on the contribution made by the historic environment to the character of a place. 2.12 Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset), taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal (para. 190). 2.13 Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation (para. 189). 2.14 When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance (para. 193). 2.15 Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification (para. 194). Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; and b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, Grade I and II* listed buildings, Grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional. 2.16 Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss (para. 195). 2.17 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use (para. 196). 2.18 The effect of an application on the significance of a non-designated heritage asset should be taken into account in
determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset (para. 197). 2.19 Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted (para. 199). 2.20 Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably (para. 200).

Summary:
Report submitted on the archaeological impact of Site 436. This report explains that: - Residential development will impact on Roman Ridge (scheduled monument); Scawsby deserted medieval village (non-designated site of regional importance), and; the probable remains of iron age to roman enclosure, trackway and field system (non designated cropmark features of probable regional or local importance). - The physical impact on Roman Ridge can be avoided through sufficient buffers of undeveloped land along the entire length of the monument within Site 436. - Development may cause some harm to the setting of the Roman Road through housing, need for access roads and reduction of rural setting, but this would be less than substantial harm to the significance of the monument. It is acknowledged that development would provide opportunities for the public to better engage with and access the monument - The degree of harm could be reduced to offset by: 1 - incorporation of a sufficient buffer of undeveloped land alongside the edge of the monument both to avoid any physical impact on the monument and to protect its immediate setting. It is suggested that a minimum 10m corridor may be sufficient and would be consistent with the development to the south; 2 - reinforcement of hedgerow planting along the Roman Ridge corridor to create a continuous enclosed route and thus restrict views of the new built environment from the bridleway; 3 - through incorporation of the Roman road as a key feature into areas of open space, and the creation of new access routes both onto the bridleway and alongside the monument, development would offer opportunities to embrace the monument by using it to help shape design, contribute towards creating a sense of place and to reinforce its role as a significant route way and boundary within the landscape; and 4 - improving public access to the monument and incorporating the new links with other heritage assets within the vicinity would help better reveal the significance of these assets and offer opportunities for improved public engagement, awareness and understanding. - With such mitigation the degree of harm would be less than substantial in terms of the NPPF and harm should be weighed against public benefits of embracing this monument as a key feature within the design and improving access too it. - The remains of Scawsby deserted medieval village can be retained as green space with links to other heritage assets in the vicinity to constitute a positive public benefit. - Impact on any non-designated sub-surface Iron Age to Roman remains or medieval settlement remains within the two arable fields and Scawsby Leys, can be satisfactorily mitigated through a staged programme of archaeological investigation, recording and publication and secured through condition. The results of such investigations would contribute to an improved understanding of settlement and landscape development over the last 2,000 years, and thus be of public benefit in terms of making a positive contribution to the developing research framework for South Yorkshire Archaeology. Overall it is considered that the development would cause less than substantial harm to the three heritage assets affected by the allocation, and that it offers the potential to deliver significant public benefits by better revealing their significance. With appropriate design and mitigation, development would be able to meet the requirements of statutory duty and comply with NPPF, paras 127, 193, 196, 197, 199 and 200.

Response:
Please see response in the SA Addendum published alongside Submission.
Description 4.1 The Roman Ridge Roman Road runs along the northern boundary of Site 436 and is currently used as a bridleway. The road formed part of the major military route from Lincoln (Lindum) to York (Eboracum) via Doncaster (Danum) and Castleford (Lagenium) and is detailed in the Antonine itinerary. 4.2 This affected section is therefore a single, relatively short section of a much larger monument with variability of survival and several different scheduled sections along its route. The extent of the Scheduled Monument, of which this section forms a part, is shown on Figure 2. It is approximately 2.5km in length and runs south from Highfields across Green Lane to the southern edge of Broad Axe field. The potential continuation of the route south-east towards Doncaster is shown on Figure 2 (Site 1165931). 4.3 Development within Site 436 has potential to impact on a 465m section of the 1.2km length of Roman Road that runs south from Green Lane to Broad Axe field. This section is a well-defined ‘green lane’ and is used as a bridleway, although there is no signage to indicate its Roman origins. 4.4 In landscape terms, the Roman Ridge forms a significant containment feature (Enplan 2016) and will have formed a key boundary and communication route through the area for at least the last 1600 years. Form 4.5 Throughout the length of the section south from Green Lane, the Roman road survives as a very distinct agger (embankment) 1-2m in height and approximately 10m in width (Plate 1). The bridleway runs along the top of the agger and is demarcated by a central tarmac strip with rough grass verge to either side that is bordered by a mixed shrub and tree hedgerow, which forms a vegetative lined corridor (Plate 2). (SEE EMAIL FOR Plate 1: Vulcan Court bridleway access point, showing height of agger. Plate 2: view north-west along the top of the Roman Ridge bridleway from Vulcan Court access point.) 4.6 For the majority of its length alongside Site 436, the upper part of the agger embankment is covered by trees or shrubs, while the lower slope is under grass, forming a distinct sharp edge between the Roman road and the ploughed field (Plates 3 and 4). (SEE EMAIL FOR Plate 3: view south-east along the boundary between the Scheduled Monument and Site 436. Plate 4: view north-west along the boundary between the Scheduled Monument and Site 436.) 4.7 South-east from Site 436, the Roman Ridge runs alongside modern housing estates? Layden Drive and Vulcan Court?and school grounds. The agger continues throughout this section and the vegetation covers the majority of the embankment slopes. Along the Layden Drive section, the southwestern edge of the agger borders a fence that encloses rear gardens (Plate 5). Through the Vulcan Court section, it borders public open space (Plate 6), which then transitions into school playing fields (Fig. 5). (SEE EMAIL FOR Plate 5: Layden Drive. View north along the line of the Roman Ridge where buffer zone has been enclosed into rear garden areas. Plate 6: Vulcan Court development. View south along the line of the Roman Ridge with open views and access.) 4.8 There is agricultural land alongside the north-east side of the road corridor with views of Scawthorpe settlement in the background (Fig. 2). 4.9 There does not appear to be any visible signs of flanking roadside ditches, although they could survive below-ground and be infilled either as a result of ploughing or vegetative growth. Character and setting 4.10 This scheduled section of Roman road is well-preserved and forms a key feature within the landscape. It retains its intended use as a communication route and its consequential role as a significant boundary feature. 4.11 The main character of the section of Roman road running south from Green Lane is that of a raised, straight-sectioned, vegetative embankment running across the landscape. When walking along the top of the agger, its character is that of an enclosed ‘green lane’ corridor, with the eye contained by the hedgerows and carried along the tarmac bridleway. The tarmac strip gives a slightly modern, rather than historic, feel to the route, although it makes the lane very accessible. 4.12 This hedge-lined corridor prevents or limits views of both the surrounding agricultural land and the built environment, including the adjacent housing estates at the southeast end of the bridleway (Plates 7, 8 and 9) and of the bungalow at its junction with Green Lane (Plate 10). It helps create a sense of rural character and enclosure, which contributes to the setting of the Roman Ridge and the creation of a tranquil context for users of the bridleway. (SEE EMAIL FOR Plate 7: view north along Roman Road, with houses along Layden Drive on the left. Plate 8: view south along Roman Ridge, with Vulcan Court to the right. Plate 9: view north along Roman Ridge, with new development off Emley Drive on the left and Site 436 beyond. Plate 10: view south along the Roman Ridge at its junction with Green Lane. The modern bungalow is shielded from view along the road corridor by a combination of hedgerow and trees.) 4.13 There are several intermittent sections of missing or low hedgerow on both sides of the Roman Ridge corridor, examples of which are shown on Plates 11 and 12. These mainly occur beyond the built-up areas. Where they occur along the boundary with Site 436, they have resulted in opening up elevated views across the north and middle fields of Site 436, south-west towards Scawby Hall, Tudor Cottage and other built development along the Barnsley Road corridor. Along the north-east boundary, these breaks allow views across agricultural land to the built development at Scawthorpe. These are, however, dynamic open views that quickly close again as walkers progress along the bridleway and hedgerow height and density are restored. (SEE EMAIL FOR Plate 11: view west from the Roman Ridge across Site 436 towards Tudor Cottage and Scawsby Hall. Plate 12: panoramic view south along Roman Ridge, with Site 436 on the right.) 4.14 Whilst these intermittent open views contribute to the sense of walking out from a built environment into the countryside and thus reinforce the rural setting of the monument and enjoyment of the walk along the Roman Ridge, they are not critical to how the heritage asset its experienced and our understanding and appreciation of its significance. Physical Impact 4.15 Development within Site 436 should have no physical impact on the Scheduled Monument. The scheduled area is tightly contained and appears to broadly reflect the agger corridor (Fig. 2). Within Site 436, the bottom edge of the agger slope is clearly defined by the grass strip, which slopes down to the ploughed edge of the field (Plates 3 and 4). Geophysical survey would determine if there are any associated features extending beyond the scheduled area that should be avoided, such as flanking side ditches. Impact on Setting 4.16 Development would occupy agricultural land immediately adjacent to the scheduled Roman road and will alter the setting of this section of monument from a rural landscape character to a built environment. This change in contextual setting of the monument will potentially...
affect its prominence in the landscape and, in visual terms, potentially reduce its role as a significant landscape boundary and containment feature. 4.17 As there is no public access across Site 436, the effects of this impact would mainly be apparent for users of the bridleway and in distant views of the monument from Scawsby Lane and Barnsley Road. 4.18 This extension of existing built environment alongside the Roman Ridge corridor would mean that users would lose that sense of emerging out from built environment into rural countryside. This would have less of an impact on those sections of the route where dense hedgerows contain views out across the landscape. It would, however, result in a change in view along those intermittent sections of the Roman Ridge with missing or low hedgerows. 4.19 The way in which we experience an asset in its setting is also influenced by other environmental factors, such as noise from other land uses in the vicinity, and therefore the proximity of new development to the monument will be a consideration. Potential mitigation 4.20 A scheduled monument is considered by the NPPF to be a heritage asset of the highest significance (para. 194b). When considering the impact of a proposed development on the significance of a designated heritage asset, the NPPF requires the local authority to give great weight to the asset’s conservation, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance (para 193). The more important the asset, the greater the weight should be, and any harm should require clear and convincing justification (para. 194). 4.21 The degree of harm to the setting of the monument and people’s enjoyment of the bridleway along the Roman Ridge depends on the extent to which the effects of this change in contextual setting could be reduced through design and mitigation. 4.22 Measures to consider that could help reduce the effects of this change include: - Geophysical survey along the corridor adjacent to the monument to determine whether there is any sub-surface archaeological remains which should be protected from development. If appropriate, trial trenching may also be required to fully determine the nature, extent and significance of survey anomalies (NPPF para. 189). - Reinforce planting along those sections of the Roman Ridge along the boundary with Site 436 where hedgerows are either missing or low. This would help contain views to along the line of the Roman Road, which would be in keeping with the overall character of the monument along this section of road (Scheduled Monument Consent would be required). - Build in a buffer zone along the length of the Roman Ridge, within which no development would take place. The width of this zone would need some consideration but at a minimum it should be 10m from the edge of the scheduled area as shown on Figures 4 and 5. This would be similar to the stand-off width between the Roman Ridge and the housing at the south-east end of the scheduled area. This buffer zone would ensure that there are no physical impacts on the scheduled monument and help retain a green context for the immediate setting of the monument and its prominence as a key feature within the landscape. - Incorporating this buffer zone into accessible public space would enable access along the south-west edge of the Roman Ridge and better appreciation of the monument, than incorporating it into rear gardens (Plates 5 and 6). This would provide a new public benefit, as along this section, the monument is not currently publicly accessible, other than along the bridleway and it is difficult to fully appreciate the form and height of the agger embankment from this angle. - Consider incorporating a new pedestrian access point onto the Roman Ridge bridleway from within the development and look at how this access point could be incorporated into an attractive and accessible open public space. - Consider how a new access point onto the Roman Ridge bridleway could be incorporated into a new footpath network linking Scawsby DMV, the new Community Parkland, Scawsby Mill public house and Scawsby Hall Nurseries (see section on Scawsby DMV below). - Consider alignment of roads and properties within vicinity of Roman Ridge and how they relate to the monument. Significance of impact 4.23 Any physical impact to the scheduled Roman road can be avoided through a combination of evaluation and the incorporation of a buffer zone along the edge of the monument. 4.24 It is acknowledged that the development would cause some harm to the setting of the Roman road through the development of housing, the need for access roads and reduction of its rural setting. 4.25 Development would also have the potential to deliver some positive benefits by improving public access to the monument and new links to the Roman road and other heritage assets within the vicinity, and thus would provide an opportunity to better reveal the significance of both the Road road and these other assets (NPPF, para 200). 4.26 By use of appropriate design and mitigation (10m buffer zone, landscaping, sensitive design layout, open public space and links), it is considered that the degree of harm to the significance of the monument would be less than substantial in terms of the NPPF. 4.27 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, the NPPF states that this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use (para. 196).

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7.1 Scawsby Leys is a large, open field to the west of Scawsby Lane and is under arable cultivation (Plate 19). (SEE EMAIL FOR Plate 19: panoramic view of Scawsby Leys taken from southern end of Scawsby Lane.) 7.2 Although there are no recorded cropmarks within Scawsby Leys, given the density of Iron Age to Roman settlement across the Magnesian Limestone, there is likely to be concern that the area has the potential for unrecorded remains of this period (Figure 2). 7.3 There is also potential that remains associated with Scawsby deserted medieval village could extend into the south-eastern corner of the site. There are, however, no visible survival of any earthworks on LiDAR imagery, so if remains do extend into this area, they are likely to have been subject to plough damage. 7.4 If development of this area as Community Parkland will result in ground disturbance below the depth of existing plough zone through landscaping, drainage, tree planting, infrastructure, etc., then it is likely that pre-determination evaluation through geophysical survey, and possibly trial trenching, would be required. As with the arable fields to the east of Scawsby Lane, the aim will be to better determine potential impact and appropriate mitigation through design or investigation. 7.5 If Iron Age to Roman remains or medieval village remains are present within this field, they are likely to be of regional or local importance depending on their state of preservation and whether or not they are settlement related. In a worst-case scenario, impact could be effectively mitigated through a combination of avoidance of impact and archaeological investigation. The potential for the presence of archaeology should therefore not constitute an absolute constraint on development of this area as Community Parkland. 7.6 There are no other recorded archaeological constraints associated with Scawsby Leys.
Description 5.1 The southern field is under pasture and contains the earthwork remains of the deserted medieval village (DMV) of Scawsby. LiDAR imagery indicates that these remains are likely to be a combination of crofts and tofts, road and ridge and furrow (Fig. 6). From ground level, the earthworks are visible within the field as a slightly undulating landscape but are not particularly well defined (Plate 13). (SEE EMAIL FOR Plate 13: view west from Ryedale Walk across the eastern extent of the DMV earthworks in the southern pasture field.) 5.2 The area has not been cultivated in recent years and the earthworks suggest that below-ground preservation of archaeological remains is likely to be high. According to the Archaeological Scoping Assessment Report, the site is considered of regional importance (ArcHeritage 2017). 5.3 LiDAR imagery suggests that the associated remains are likely to extend north into the middle arable field, possibly west into the south-east corner of Scawsby Leys, and to the south of Barnsley Road. Remains in these arable fields will have been truncated by ploughing and are unlikely to be as well preserved as those in the southern pasture field. 5.4 The field is set in a slight dell below the level of Barnsley Road. It is contained by mature hedgerow along its northern boundary with the middle arable field and along its southern boundary with Barnsley Road as far as Tudor Cottage, where it changes to stone wall. To the east, a green metal fence separates the field from Ryedale Walk public footpath and the 20th-century housing estate beyond (Plate 14). Along its western boundary, the field is bounded by buildings and Scawsby Lane. Scawsby Leys, the area proposed for Community Parkland, lies immediately opposite on the west side of Scawsby Lane. (SEE EMAIL FOR Plate 14: View north along eastern boundary of southern pasture field with Ryedale Walk and modern housing to the east) 5.5 Tudor Cottage, a Grade II listed building, is inset into the field towards the western end (Plate 15). Scawsby Mill and the 17th-century Grade II listed Scawsby Hall, lie on the south side of Barnsley Road and opposite the western end of the field (Fig. 2; Plate 16). (SEE EMAIL FOR Plate 15: panoramic view east along Barnsley Road, with Tudor Cottage and southern pasture field on the left and Scawsby Mill and Scawsby Hall on the right. Plate 16: panoramic view east along Barnsley Road, with Scawsby Hall and Scawsby Mill on south side of road.) Recommended mitigation 5.6 Given the reasonable survival of the DMV earthworks and the high potential for wellpreserved below ground remains, it is recommended that the southern field as shown on Figures 4 and 5 should be excluded from development and retained as an area of green open space within any development proposals. 5.7 Any ground disturbance (landscaping, tree planting, drainage, infrastructure, etc.) that would cause damage to below ground archaeological remains should be avoided where possible. Where limited, localised ground disturbance is unavoidable, then a programme of evaluation (geophysical survey and, if appropriate, trial trenching) should be undertaken. This should aim to ensure that impact on the most significant remains is avoided and to provide the basis for agreeing an appropriate programme of investigation to mitigate any harm or loss to the medieval remains (NPPF, paras. 189 and 199). 5.8 The area offers opportunities to create an attractive green corridor along the northern edge of the Barnsley Road corridor. Pedestrian access through this corridor could create a link between the existing footpath network through the 20th-century housing estate to the east (Plate 17) and the proposed community parkland at Scawsby Leys, as well as footpath links to Scawsby Mill public house and Scawsby Hall Nurseries to the south of Barnsley Road; there is an existing gateway from the field on to Barnsley Road just west of Tudor Cottage (Plate 18). It would also offer opportunities to link into paths through the new development to the north and onto the Roman Ridge bridleway. This would improve permeability and access along this busy road corridor zone and create new opportunities for connectivity into existing public footpaths and links between the various heritage assets within this area. (SEE EMAIL FOR Plate 17: views east and west showing parts of footpath network through 20th-century housing estate lying to east (top) and the DMV earthworks beyond metal fence to the west (bottom). Plate 18: existing gateway from the southern field onto Barnsley Road.) 5.9 The DMV earthworks are unlikely to meet criteria for scheduling. Therefore, there would be a strong argument that, by designating the area as green space, development of Site 436 would offer the potential beneficial impact of providing for the long-term protection of these remains from ploughing. It could also contribute to protecting and enhancing the setting of the listed buildings to the south. 5.10 Further beneficial impacts could be achieved through improving public awareness and understanding of the heritage assets within this area. This would partly be achieved through any improved physical connectivity between Scawsby DMV, Scawsby Hall, Scawsby Mill, Tudor Cottage and the Roman Ridge Roman Road. It could be further enhanced by building in some level of community involvement during the investigations of the Iron Age to Roman remains within fields to the north and dissemination of information about the heritage assets within the area through a combination of on-site interpretation boards, footpath leaflets, parish website, community talks on heritage work being undertaken in support of the development, visits to local schools, etc. (NPPF, para. 200).

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8.1 Residential development of land to the east of Scawsby Lane will impact on: - Roman Ridge Roman Road, a Scheduled Monument; - Scawsby deserted medieval village earthworks, a non-designated site of regional importance; and - the probable remains of Iron Age to Roman enclosure, trackway and fieldsystem, which are non-designated cropmark features of probable regional or local importance. 8.2 Physical impact on the Roman Road can be avoided through use of a sufficient buffer of undeveloped land along the entire length of the monument within Site 436. 8.3 It is acknowledged that the development would cause some harm to the setting of the Roman road through the development of housing, the need for access roads and reduction of its rural setting but that this would constitute less than substantial harm to the significance of the monument. It is also considered that development would offer opportunities for public benefit through enabling improved public engagement with, and access to, the monument. 8.4 It is considered that the degree of harm to the setting of the Roman road could be reduced and offset by adoption of the following types of mitigation: - incorporation of a sufficient buffer of undeveloped land alongside the edge of the monument both to avoid any physical impact on the monument and to protect its immediate setting. It is suggested that a minimum 10m corridor may be sufficient and would be consistent with the development to the south; - reinforcement of hedgerow planting along the Roman Ridge corridor to create a continuous enclosed route and thus restrict views of the new built environment from the bridleway; - through incorporation of the Roman road as a key feature into areas of open space, and the creation of new access routes both onto the bridleway and alongside the monument, development would offer opportunities to embrace the monument by using it to help shape design, contribute towards creating a sense of place and to reinforce its role as a significant routeway and boundary within the landscape; and - improving public access to the monument and incorporating new links with other heritage assets within the vicinity would help better reveal the significance of these assets and offer opportunities for improved public engagement, awareness and understanding. 8.5 Taking into account the proposed mitigation it is considered that the degree of harm to the significance of the monument would be less than substantial in terms of the NPPF and that this harm should be weighed against the public benefits that would arise as a result of embracing the monument as a key feature within the development design and improving public access. 8.6 It is considered that retention of the earthwork remains of Scawsby deserted medieval village as green open space with links to other heritage assets in the vicinity would constitute a positive public benefit. 8.7 Impact on any non-designated subsurface Iron Age to Roman remains or medieval settlement remains within the two arable fields and Scawsby Leys, can be satisfactorily mitigated through a staged programme of archaeological investigation, recording and publication and secured through condition. The results of such investigations would contribute to an improved understanding of settlement and landscape development over the last 2,000 years, and thus be of public benefit in terms of making a positive contribution to the developing research framework for South Yorkshire Archaeology. 8.8 Overall it is considered that development would cause less than substantial harm to the three heritage assets affected by the allocation and that it offers potential for significant public benefit in terms of opportunities to better reveal their significance. With appropriate design and mitigation, development would be able to meet the requirements of statutory duty and comply with NPPF, paras 127, 193, 196, 197, 199 and 200.

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6.1. Strata Homes object to Policy 6 and the proposed distribution and that the site at Broad Axe, Scawthorpe, Doncaster site (Site 234) is not allocated. 6.2. This site is summarised below and detailed representations including an Advocacy Report and Masterplan Framework have previously been submitted in support of this site demonstrating its deliverability. A delivery statement has been prepared and will be submitted shortly. This work has in part led to identification of the site as an allocation in the draft Local Plan. Test of Soundness 6.3. Strata Homes considers that the Local Plan is currently unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 6.4. Strata Homes is concerned that the Local Plan is not producing sufficient homes across the Borough. Further to comments in relation to Policy 3 Strata Homes recommends that further sites are identified to meet and exceed the requirement but also to provide a sufficient buffer to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the Framework requirements for the plan to be positively prepared and flexible. 6.5. Strata Homes is concerned that the proposed distribution of new homes does not reflect the spatial strategy, but importantly does not address the focus for economic and housing growth across the Sheffield City Region and Yorkshire and Humber as a whole. 6.6. The proposed distribution against the Council’s own targets shows a deficiency and a significant under provision in: - Doncaster - Adwick - Conisbrough - Denaby - Mexborough - Thorne - Moorside - Sprotbrough - Tickhill - Bawtry 6.7. Strata Homes, as explained in response to Policy 2 and the spatial strategy considers that the spatial strategy is incorrect, that it does not provide for the growth of the Borough and does not reflect the role, function and location of the settlements. 6.8. Strata Homes, as explained in response to Policy 2 and 3, considers that there needs to be further provision of housing and a slightly amended approach to the spatial strategy, which focuses growth towards Doncaster. There should be further growth of Rossington to address regeneration and the provision of new infrastructure. There should be growth in Thorne-Moorside, and a regeneration focus in Carcroft-Skefflow which should elevate the status of the settlement commensurate to its role and function. New housing should be provided in Tickhill to address the current under provision. Wadworth should accommodate some new housing to reflect its role and function and provision should also be made in villages to address the rural economy. 6.9. Strata Homes is particularly concerned that there is an under provision of housing in Doncaster, which the spatial distribution, established in policy 2, suggests should be accommodating at least 50% of new homes. This would equate to 9200 Homes based on the requirement of 18,400. The total permissions and allocations in Doncaster equate to 7,441 homes (not accounting for completions). This is significantly short of that requirement for Doncaster, further the main urban area is identified as the focus for economic and housing growth and should be accommodating more housing. 6.10. Further Strata Homes are concerned about the deliverability of a number of allocations within the main urban areas. These include but are not limited to the following sites: 6.11. Strata Homes object to the allocation of site 838, which whilst benefiting from an extant permission the Residential Land Availability Report 2018 indicates that there are no completions on site and the site is not currently being developed. Further the council have been unable to produce any further deliverability information to support its inclusion within the Doncaster 5 Year Deliverable Housing Land Supply Statement. As a minimum the forecast contribution to the local plan should be reduced. 6.12. Strata Homes object to the allocation of site 843. Strata Homes consider that the delivery rates for this site are unrealistic based on performance at the site. The Residential Land Availability Report states that completions for the last year amounted to 39 dwellings. The local plan is suggesting a delivery rate of 70 dwellings per year. This is significantly over what has been achieved at this site or indeed other sites in Doncaster according to data in the residential land availability report. 6.13. Strata Homes object to the allocation of Site 984. Strata Homes consider that the delivery rates for this site are unrealistic. The Local Plan indicates that this is an outline permission. There are significant constraints, it is a brownfield site that is entirely within Flood Zone 3. However, the Local Plan is assuming a delivery rate of 56 dwellings per annum in the first five years and 64 dwellings per annum in year 6-10. This is overly optimistic, and not consistent with the planning status, constraints and likely viability issues associated with site. 6.14. Based on the above it is clear that the deliverability and delivery rates of some of the sites in Doncaster ought to be reviewed to ensure that they reflect the site specific circumstances. Further allocations are required in Doncaster to ensure that the Plans strategy can be delivered. 6.15. As indicated in response to Policy 2 Strata Homes are also concerned that the Plan does not provide sufficient support for development in Defined Villages. Strata Homes consider that in line with the provision of the Framework, paragraph 78, which is clear that to promote sustainable development in rural areas, ‘Housing should be located where it will enhance or maintain the vitality of rural communities. Planning Policies should identify opportunities for villages to grow and thrive, especially where this will support local services’. 6.16. Furthermore, there does not appear to be any safeguarded sites identified within the Local Plan. This is concerning given Policy 6 states that the Plan will designated Reserve Development Sites, yet those identified are not considered to be developable within the Plan Period due to significant constraints relating to flood risk and HS 2 Safeguarding, thus could not be relied on to maintain the supply of housing should other sites fail to deliver in the Plan period. As indicated in response to Policy 3 Strata Homes suggest, that safeguarded sites be proposed, to provide additional flexibility in accordance with national guidance. 6.17. Strata Homes consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 6.18. However, Strata Homes consider that with the proposed allocations and the deletion or adjustment in anticipated delivery within the plan period of sites 838, 843, and 984 that the Local Plan can be found sound. Strata Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 6.19. To overcome the objection and address
soundness matters, the Council should: 6.20. Delete or reduce the expected yield of the following allocations: - Site 838 - Site 843 - Site 984 6.21. To address the identified deficiencies in the Plan the following sites should be allocated: - Site 234: Broad Axe, Scawthorpe, MUA 6.22. A short summary of this site is in the following sub-section and a Delivery Statement and Masterplan will be submitted shortly which explains in detail the site's deliverability. Strata Homes Object to their site at Broad Axe, Scawthorpe not being allocated for housing. 6.23. The Council previously identified the site as a proposed housing allocation and concluded that the site is required to meet the housing needs of Doncaster and is a sustainable site to meet the housing growth of the area. This reflects the Council's earlier conclusions that the site is a sustainable and appropriate site to meet the housing needs of the Borough. The Council have now indicated that the site is no longer required as there have been two significant permissions in the settlement which have reduced the need to rely on urban extensions in order to meet the authority's housing needs. However as identified above, Strata Homes maintain that there are insufficient housing allocations in Doncaster MUA to meet the spatial strategy set out in Policy 2, and that of those allocated there are significant concerns regarding deliverability and the rates of delivery. Thus more sites are required. The Council have noted objections on the grounds of loss of Green Belt, but also note that site performs similarly in the Sustainability Appraisal and Green Belt review to other allocated sites. 6.24. Strata Homes maintains that the proposed housing site at Broad Axe is available, suitable and achievable and is therefore in accordance with the Framework a deliverable site able to come forward in the short term. 6.25. The deliverability and benefits of the Broad Axe, Scawthorpe site is as follows: Overview of Proposals. 6.26. The site is located on the edge of Scawthorpe with established residential areas on three sides. The allocation is being promoted in an area that is already well served and has easy access to a full range of services and facilities located within Scawthorpe/ Skawbs/ Bentley Rise, as well as in Doncaster itself. The site lies adjacent to the A638 York Road. The site is approximately 21.21ha gross and could accommodate in the region of 550 new homes. Availability. 6.27. The land is being promoted by Strata Homes Ltd who control the land. The site is therefore available in accordance with the Framework and the National Planning Practice Guidance (PPG). 6.28. The proposed development can make an efficient and attractive use of the land. The site represents an excellent opportunity for future housing and associated development. This site allows housing to be delivered within an appropriate and sustainable location within Doncaster. Suitability 6.29. The site is located in a highly sustainable location and has residential development to the south, east and west, as well as the Don Valley Academy on the opposite side of the A638. The site is within easy walking distance to shops (Aldi/Tesco Express) to the south and schools and leisure facilities in the vicinity. The Danum Retail Park is just under a mile to the south-east and beyond that facilities within Doncaster Town Centre, a short bus ride away. 6.30. The site is well served by buses with stops on the site frontage on the A638, providing opportunities for sustainable travel to work in Doncaster and beyond with access to Doncaster Railway Station. Bentley Railway station is just under a mile to the east. 6.31. The development will provide additional quality development that will benefit the Doncaster and wider district with economic, environmental and social benefits. It is therefore considered that the development is suitable. Green Belt 6.32. It is evident from the site location plans and analysis within the Masterplan Framework and the Council's own site assessment, that development of the site would neither detract from the purposes nor function of the Green Belt in this location. The Council's own site assessment summary notes that in relation to Green Belt it performs the same as other allocated sites. 6.33. As set out within the Framework, the 'fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.' 6.34. In summary, the allocation of this site for subsequent residential development will: - Strengthen the Green Belt boundary in this location by 'rounding off' the urban area with the strong defensible boundary; - It will neither encroach in to the open countryside, affect openness nor set a precedence for further incursions in the open countryside; - Its development would not have any significant impact on the openness of the wider Green Belt to the north of the site. 6.35. In terms of the Framework and Green Belt purposes, the site does not achieve any of the five purposes for including land in the Green Belt and its development would create a logical rounding off of the urban area. This means that: - The site at present does not check unrestricted sprawl of large built-up areas, - It does not prevent neighbouring towns from merging - It does not assist in safeguarding the countryside from encroachment. - The current site does not preserve the setting or special character of a historic town - The site does not assist in urban regeneration 6.36. In terms of the use of land in the Green Belt, the site does not fulfil any of the objectives set out in the Framework. The site is currently in agricultural use and as such does not provide any opportunities for access to the open countryside or for outdoor sport or recreation. As identified through the technical assessments that have been undertaken (within the Masterplan Framework) the site does not have any particular landscape benefit or secure any significant natural conservation interests. 6.37. The site is predominantly Grade 3b agricultural land and hence does not constitute the best and most versatile farm land. Therefore it does not serve any productive beneficial purpose. In addition, the site does not have any role in improving damaged and derelict buildings or structures worthy of retention. 6.38. The Framework states that Green Belt boundaries should be drawn so as not to include land which it is unnecessary to keep permanently open. 6.39. The Broad Axe site does not stop the coalescence of neighbouring towns, encroach on the countryside nor affect the setting and special character of an historic town and as such serves no Green Belt purpose. Therefore, a change in the Green Belt boundary, particularly given the housing need, would be appropriate and would not undermine its principle purpose. 6.40. The new Green Belt boundary, as identified in the Masterplan Framework, has been designed to respect both the topography of the site and the wider landscape and will define and enclose the urban area with a strong and defensible boundary, with the land beyond being retained within Green Belt. An existing hedge line runs along the north western boundary of the site, and is a defensible boundary over the coming plan period and beyond. 6.41. It is clear from the evidence above and the consideration of the site in the context of national and local policy, the removal of this site from the Green Belt at this time would be inappropriate and would not undermine any of the key objectives and aims of Green Belt policy. Sustainability. 6.42. The site is clearly a highly sustainable site, well connected to the main urban area and one which the Council itself has considered to be one of the most sustainable housing sites adjoining the main urban area. 6.43. It is evident from that the site, and the proposed development would clearly constitute sustainable development which would afford a strong presumption in favour of allocation and future development, in accordance with the Framework and the development plan. Achievable. 6.44. The technical work undertaken to date in respect of highways, ecology, flood risk and drainage, heritage and agricultural land has influenced the indicative masterplan. It has also shown that there are no known constraints, that could not be suitably mitigated, that would prevent this site coming forward within the plan period. As such, the development of the site, as shown within the indicative masterplan, is considered achievable. 6.45. The indicative masterplan shows how a mix of housing can be accommodated within the site, alongside Public Open Space, landscaping and drainage features. The scheme would be attractive to the market and meet the need and demand for housing in the area. 6.46. The highway work confirms the suitability of the site access and highway network to accommodate the proposed development. The highway work has concluded that the development proposals are acceptable and can be supported from a transport perspective. 6.47. The site is not in an area at risk of flooding. The drainage work has identified a drainage strategy for the site. It has confirmed the attenuation required on site and demonstrated the suitability of the area identified on the masterplan for this purpose. 6.48. Ecological survey work has confirmed there are no ecological constraints to the development of the site and recommended how habitats can be enhanced and created. 6.49. The heritage assessment has not identified any insurmountable constraints and the agricultural land classification report has shown the site as grade 3b and is therefore not best and most versatile land. Deliverability. The site at Broad Axe, Scawthorpe provides a development opportunity that is available, suitable and achievable and therefore it is considered that the site is deliverable, in accordance with national planning policy and guidance. It is promoted by Strata Homes Ltd and is deliverable within the plan period. Effective Use of Land. 6.50. Although the site is greenfield, the proposed scheme will utilise
and enhance existing infrastructure. Whilst not previously developed it is currently under-utilised. The site is easily accessible and the proposed main access is off The A638 York Road. The scheme is therefore making an efficient and effective use of land and infrastructure. Delivering a Flexible Supply of Housing. 6.51. The Framework requires Local Planning Authorities to meet their full objectively assessed housing need. Strata Homes considers that the site at Broad Axe, Scawthorpe is deliverable in the short term and will reinforce the housing supply and address the Borough’s housing needs in the early periods of the Local Plan. Development of the site is backed by a major housebuilder and is fully capable of being delivered in the next 5 years. A Positive Response to the Key Objectives of the Framework 6.52. The Framework sets out that the Governments key housing policy goal of significantly boosting the supply of housing and proactively driving and supporting sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs. The Framework explains that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as extensions to towns, and creating mixed and sustainable communities with good access to jobs, key services and infrastructure. Sites should also make effective use of land and existing infrastructure. 6.53. In relation to the Framework: - The proposal responds positively towards national guidance. - The site is appropriate for accommodating housing growth, being an expansion (rounding off) of an existing settlement with existing built up areas on three sites. - The proposed site is accessible to existing local community facilities, infrastructure and services, including public transport. - The site has been assessed as being available, suitable and achievable for development. Benefits of Broad Axe, Scawthorpe 6.54. The development of the site would provide significant economic, social and environmental benefits. The site would provide housing that would meet the needs of the Doncaster housing market. Therefore this site provides a unique opportunity in a sustainable location and without compromising the Green Belt function and purpose. 6.55. In accordance with the Framework this representation has shown that: - The site is suitable for housing and can deliver circa 550 new homes. - The proposal will deliver high quality housing. - The proposal will deliver affordable housing. - The proposal can provide a good mix of housing commensurate to the demand and need in the area. - The scheme uses land efficiently and effectively. - The proposal is in line with planning for housing objectives. - The site is within a sustainable location situated in close proximity to facilities and services and also to bus stops for local bus routes. - The proposal will deliver public open space. - The scheme represents an opportunity to achieve gains for biodiversity through environmental and ecological enhancement. - The scheme will create direct and indirect job opportunities both during and after construction. 6.56. The proposal is an appropriate site to provide for the housing needs of Doncaster in the short term. Confirmation of the allocation will contribute positively to a balanced housing supply in the Borough in sustainable locations. The site can deliver a full range and mix of housing as part of a sustainable community. Development of the site would deliver affordable housing. Doncaster needs to have a robust housing trajectory with a sufficient supply of deliverable sites. The site at Broad Axe, Scawthorpe will assist with this delivery in the short term. The site is situated within a prime location suitable for residential development and as such would facilitate the development of land in an effective and efficient manner. Development of the site would not harm or undermine the area's wider policy objectives, but seeks to reinforce the need to develop sites within sustainable locations as a priority. 6.57. The site is available, suitable and achievable and therefore deliverable in accordance with the Framework. Proposed Change 6.58. To overcome the objection and address soundness matters, the Council should: 6.59. Strata Homes consider that the following sites should be deleted or the yield within the plan period should be significantly reduced: - Site 838 - Site 843 - Site 984. 6.60. To address the identified deficiencies in the Plan Strata Homes therefore suggest that the following sites be allocated: - Site 234: Broad Axe, Scawthorpe, MUA

Summary:
Strata Homes object to Policy 6 and the proposed distribution and that the site at Broad Axe, Scawthorpe, Doncaster site (Site 234) is not allocated. Strata Homes is concerned that the Local Plan is not producing sufficient homes across the Borough. The proposed distribution of new homes does not reflect the strategic policy and does not address the focus for economic and housing growth across the Sheffield City Region and Yorkshire and Humber as a whole. The proposed distribution against the Council's own targets shows a deficiency and a significant under provision in - Doncaster; - Adwick; - Conisbrough - Denaby; - Mexborough; - Thorne - Moorends; - Sprotborough; - Tickhill; and - Bawtry The spatial strategy considers that the spatial strategy is incorrect, does not provide for the growth of the Borough and does not reflect the role, function and location of the settlements. As explained in response to Policy 2 and 3, there needs to be further provision of housing and a slightly amended approach to the spatial strategy, which focuses growth towards Doncaster. Strata Homes consider that with the proposed allocations and the deletion or adjustment in anticipated delivery within the plan period of sites 838, 843, and 984 that the Local Plan can be found sound. Strata Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. To address the identified deficiencies in the Plan Site 234: Broad Axe, Scawthorpe, MUA, should be allocated: The Council previously identified the site as a proposed housing allocation and concluded that the site is required to meet the housing needs of Doncaster and is a sustainable site to meet the housing growth of the area. This reflects the Councils earlier conclusions that the site is a sustainable and appropriate site to meet the housing needs of the Borough. The Council have now indicated that the site is no longer required as there have been two significant permissions in the settlement which have reduced the need to rely on urban extensions in order to meet the authority's housing needs. However, Strata Homes maintain that there are insufficient housing allocations in Doncaster MUA to meet the spatial strategy set out in Policy 2, and that of those allocated there are significant concerns regarding deliverability and the rates of delivery. Thus more sites are required. The Council have noted objections on the grounds of loss of Green Belt, but also note that site performs similarly in the Sustainability Appraisal and Green Belt review to other allocated sites. The proposed housing site at Broad Axe is available, suitable and achievable and is therefore in accordance with the Framework a deliverable site able to come forward in the short term. Availability: the land is being promoted by Strata Homes Ltd who control the land. Suitability: the site is located in a highly sustainable location and has residential development to the south, east and west, as well as the DonValley Academy on the opposite side of the A638. The site is within easy walking distance to shops (Aldi/ Tesco Express) to the south and schools and leisure facilities in the vicinity. The Danum Retail Park is just under a mile to the south-east and beyond that facilities within Doncaster Town Centre, a short bus ride away. The site is well served by buses with stops on the site frontage on the A638, providing opportunities for sustainable travel to work in Doncaster and beyond with access to Doncaster Railway Station. Bentley Railway station is just under a mile to the east. The development will provide additional quality development that will benefit the Doncaster and wider district with economic, environmental and social benefits. It is therefore considered that the development is suitable. Green Belt: development of the site would neither detract from the purposes nor function of the Green Belt in this location. The Councils own site assessment summary notes that in relation to Green Belt it performs the same as other allocated sites. The allocation of this site for subsequent residential development will:- Strengthen the Green Belt boundary in this location by ‘rounding off’ the urban area with the strong defensible boundary; - neither encroach into the open countryside, affect openness nor set a precedent for further incursions in the open countryside; - not have any significant impact on the openness of the wider Green Belt to the north of the site. Sustainability: the site is a highly sustainable site, well connected to the main urban area and one which the Council itself has considered to be one of the most sustainable housing sites adjoining the main urban area. Achievable: technical work undertaken to date in respect of highways, ecology, flood risk and drainage, heritage and agricultural land has influenced the indicative masterplan. It has also shown that there are no known constraints, that could not be suitably mitigated, that would prevent this site coming forward within the plan period. As such, the development of the site, as shown within the indicative masterplan, is
The site provides a development opportunity that is available, suitable and achievable and therefore it is considered that the site is deliverable. Effective Use of Land: Although the site is greenfield, the proposed scheme will utilise and enhance existing infrastructure. And is currently under-utilised. The site is easily accessible. Delivering a Flexible Supply of Housing: the site is deliverable in the short term and will reinforce the housing supply and address the Borough's housing needs in the early periods of the Local Plan. - The site is suitable for housing and can deliver circa 550 new homes. - The proposal will deliver high quality housing. - The proposal will deliver affordable housing. - The proposal can provide a good mix of housing commensurate to the demand and need in the area. - The scheme uses land efficiently and effectively. - The proposal is in line with planning for housing objectives. - The site is within a sustainable location situated in close proximity to facilities and services and also to bus stops for local bus routes. - The proposal will deliver public open space. - The scheme represents an opportunity to achieve gains for biodiversity through environmental and ecological enhancement. - The scheme will create direct and indirect job opportunities both during and after construction.

Aside from Mexborough, the Main Urban Area and all the Main Towns mentioned are only short against the top of their ranges. As the Housing Topic Paper explains, not all of these settlements need to meet the top of their range, as long as the overall number balances out at approx. 90% of housing in these two areas, which it does. In Bawtry and Sprotbrough the shortfall against the target is relatively small and in Tickhill there are no other suitable sites. However, overall the borough is delivering enough housing across the plan period, and shortfalls are made up for in other areas. There is focus on the Main Urban Area, with over 50% of housing being delivered here between 2018 - 33. Broad Axe is a Green Belt site which scored moderately in the Green Belt Review - however the need to use Green Belt land in the Main Urban Area has been tempered by permissions granted at Hungerhill and Mere Lane, elsewhere in the Main Urban Area for a combined total of over 1,100 houses. Please see Site Selection Methodology and Green Belt Review / Topic Paper for more info.

Response:

Broad Axe Field Site 234  With the omission of Broad Axe Field from the list of proposed housing development sites. We believe the Local Plan is sound. Broad Axe Field is A) Green Belt and 'exceptional circumstances' under Green Belt Policy have not been triggered. B) Located adjacent a Scheduled Monument, and is therefore allocated rights to preserve its 'Setting' C) Is good quality agricultural land. D) In the Green Belt Review it is recognised the site avoids the merging of adjacent communities, acting as a Green Wedge.

Summary:
As site 234 (Broad Axe) is omitted from the list of proposed housing sites, we believe the Local Plan is sound. Broad Axe is Green Belt and there are no exceptional circumstances; adjacent to a scheduled monument and therefore allocated rights to preserve its setting; good quality agricultural land, and; acknowledged in the Green Belt review as avoiding merging the adjacent communities, being a 'green wedge'.

Response:
Comments noted and support for plan soundness welcomed.
**Comment Ref:** C/Site 438/03160/5/002  
**Date:** 26/09/2019  
**Name:** Mr Paul Whiting  
**Organisation:**  
**Reason:** Written Representation  
**Attend Examination:**  
**Area:** Chapter 16: Spatial Proposals  
**Policy:** Doncaster Main Urban Area  
**Tests of Soundness:**  

### Comment:

Waterfront Site 438  The omission of any housing allocation in the Local Plan from site 438, is a serious simplification and misinterpretation of the Sequential Flood Risk Test. This site is vital for the strategic vision of the regeneration of the town centre. To leave this area in a rundown neglected state and lay the Greenbelt open to development is wrong. Appropriately designed housing and development needs to be directed to the area under the Exception Test. The Environment Agency saw no unmanageable risk in the development of this site with appropriate design. It should be possible to show the wider sustainable benefits from this site outweigh the flood risk.

### Summary:

The omission of site 438 (Waterfront) is a simplification & misinterpretation of the Sequential Flood Risk Test. The site is vital for the strategic vision of the town centre’s regeneration. It is rundown and neglected and leaving it as such whilst the Green Belt is developed is wrong. Appropriately designed housing could be directed here under the Exception Test. The Environment Agency saw no unmanageable risk in the development of this site with appropriate design. It should be possible to show wider sustainable benefits outweigh flood risk.

### Response:

No land is being allocated in flood zones. The site is noted as a Reserve Development site, where, subject to constraints being overcome, development would be appropriate - however these do not count towards any allocations totals or targets - as set out in the Housing Topic Paper.
Comment: The interactive policies map indicates that the site lies outside the proposed development boundary for Doncaster Urban Area. The allocation of the site an extension to the existing built form of the settlement means that the site will be part of the urban area and the development boundary of the urban area should be amended to include the allocated site. The proposal map needs amending on this basis. PROPOSED CHANGE 8. Amend the policies map to reflect the urban area boundary. As explained in detail above.

Summary:
Objects to Policies Map not includng site allocation (ref 164/430) within the development limits of the Doncaster Main Urban Area. Proposed change - amend Policies Map accordingly.

Response:
Development limits have been identified in line with the methodology which has been subject to previous consultation and was clear that greenfield allocations will sit outside of the settlement where identified on the edge of a town/village but will be incorporated through future reeviw of the plan when permission has been implemented and full details are known in respect to layout etc.
Comment Ref: C/Policy H6/03453/1/003

Attend Examination: Attend Hearing

Reason: We act for a number of major land owners in the Doncaster area, we have detailed knowledge of the sites and the planning history of the Borough. We have previously been involved with the Core Strategy Plan and with the Examination of the draft Sites and Policies DPD. Our knowledge of the various land parcels, ownerships, the strategic land position and site specific details, means that we have information to inform the debate regarding the overall housing requirement and the specific allocation of sites which will assist the examination.

Area: Chapter 16: Spatial Proposals

Policy: Doncaster Main Urban Area

Tests of Soundness: Positively prepared  Justified  Effective  Consistent with national  Legally Compliant

Comment:

Support is made in principle for the allocation of site 164 and 430 Land East of Warning Tongue Lane Doncaster. The site area is noted as 11.06 hectares with an indicative capacity of 275 dwellings. Objection is made to Table 5 of the Plan that sets out the housing requirement. The text indicates that the requirement is variable between the bottom and top of the requirement range, but the table sets out the requirement at the top of the range. It is therefore unclear. The Plan should allocate sites and plan for the top of the range figure, and allocate sufficient land to meet the remaining requirements for the 17 years of the Plan. The table as drafted allocates land for 15 years rather than 17 years and appears to under allocate the residual requirement which is 15,000 new homes. The supply figures in the table do not reconcile with the figures at paragraph 16.21. Some of this issue relates to the fact that sites with planning permission are also allocated. Allocating sites with permission is confusing the plan and sites with permission do not need to be specifically allocated. The Plan should be clear about what the contribution of the sites with Planning Permission is and how this number is discounted, and what are the new allocations. The Plan is imprecise as drafted.

PROPOSED CHANGE 4. Provide a table and plan in the text clearly indicating allocations. As explained in detail above.

Summary:

Support is made in principle for the allocation of site 164 and 430 but objects to Table 5 that sets out the housing requirement. The text indicates that the requirement is variable between the bottom and top of the range, but the table sets out the requirement at the top of the range. It is therefore unclear. The Plan should allocate sites and plan for the top of the range figure, and allocate sufficient land to meet the remaining requirements for the 17 years of the Plan. The table as drafted allocates land for 15 years rather than 17 years and appears to under allocate the residual requirement which is 15,000 new homes. The supply figures in the table do not reconcile with the figures at paragraph 16.21. Some of this issue relates to the fact that sites with planning permission are also allocated. Allocating sites with permission is confusing the plan and sites with permission do not need to be specifically allocated. The Plan should be clear about what the contribution of the sites with Planning Permission is and how this number is discounted, and what are the new allocations. Proposed change - Provide a table and plan in the text clearly indicating allocations.

Response:

Believe the table sets out the position clearly. Table 5 does not correlate with para. 16.21 as the former is a borough wide total and the latter is only related to the Main Urban Area. If every settlement delivered at the top of the range there would be an oversupply of housing. They are designed to allow some areas to deliver more or less based on local circumstances and site availability, whilst ensuring that overall the borough meets its housing targets. This has been achieved. The plan delivers enough housing to meet it’s 20 year requirement, and can show how it will deliver enough housing for the 15 year period 2018 - 33 and the remaining 2 years, as well as demonstrate supply via completions for the years 2015 - 18. Chapter 16 and the Housing Topic Paper show the sites which are permissions, and those which are non-permissioned allocations.
We wish to discuss with the Inspector and Council our concerns regarding the Open Space allocation at Warmsworth. There is detailed evidence which will need to be discussed orally.

We note that the Council has identified several sites proposed for housing allocations in accordance with Policy 3. However, it is considered that there are other more suitable sites, in more sustainable locations, to meet the housing needs of the Borough. Our clients own land at Warmsworth and, it is considered that their land provides logical and sensible sites to be allocated for residential development. As such, the Warde-Aldam Estates supports the future development of three sites within their ownership. The sites are known as follows: - "Mill Lane, Warmsworth" - HELAA Housing Site Reference 213 - "Common Lane, Warmsworth" - HELAA Housing Site Reference 212 & 214 - "West Farm Fields between High Road and Low Road West, Warmsworth" - HELAA Housing Site Reference 162": The three sites are set out in Figure 1 below. (SEE EMAIL FOR Figure 1 Plan of Three Sites) THIS REP IS ABOUT SITE 215 (referred to here as 162) - FOR THE OTHER SITES SEE REPS 04707 / 04708 / 04709

SITE 215 (referred to in representation as 162) including land at "West Farm Fields between High Road and Low Road West, Warmsworth" should be allocated for housing. Justification is given elsewhere in representation regarding specific local plan policies and designations.

The Site Selection Methodology, Green Belt Review and Topic Paper, and Local Green Space Methodology and Sites report all cover reasons why these sites have not been allocated for housing. 162 is a proposed Local Green Space allocation, as discussed more in the Local Green Space Methodology and Sites document.
The Site (Site Reference 162 in the HELAA), is located north of Low Road West and south of High Road (the A630). It is irregular in shape and is located in the centre of Warmsworth which is located within the Doncaster Main Urban Area. The site is circa 1.0 hectares in size and is surrounded by existing residential development, a hotel and restaurant. The land is currently used for agriculture and is generally flat in topography with a few old underused agricultural buildings located within the site boundary. The land is under a single private ownership. There are trees located along the northern boundary of the site but this would not be a constraint to development. The existing trees could be easily accommodated within a development scheme. Furthermore, site is located within Flood Zone 1 and is therefore not prone to flooding (see Figure 9 below for reference). (SEE EMAIL FOR Figure 8 Aerial Image of West Farm Fields between High Road and Low Road West, Warmsworth And Figure 9 Extract from the Governments Flood Risk Map - From Rivers and Sea) It can be confirmed that when viewing the existing Policies Map for the Doncaster Unitary Development Plan (UDP), part of the site (0.6 hectares) is located within the Residential Policy Area. The western half of the site is also identified as ‘open space’ (0.4 hectares). Whilst the entire site is located within the Warmsworth Conservation Area. Please see an extract from the UDP Policies Map below (Figure 10) for reference. (SEE EMAIL FOR Figure 10 Extract from the UDP Policies Map) Within the Council’s designated residential area, development which would result in unacceptable loss of residential accommodation or, land potentially suitable for housing purposes, will require appropriate justification if it is not to be developed for residential use (saved UDP Policy PH10). We support this current position. There are no constraints to bringing this eastern part of this site forward for development in the short term. This site is considered a well contain site within the Main Urban Area capable of accommodating future housing development to meet the objectively assessed housing need for the Borough over the Plan period. We therefore respectfully request that this site either 1) remains as existing (as currently set out in the UDP) in that the eastern part of the land remains within the Residential Policy Area, with the western parcel providing the open space for the area, or 2) is wholly allocated for residential development. It is considered that the site could accommodate circa 10-20 new dwellings over the Plan period. Please see our comments below in Section 4 for further detail regarding Local Green Space allocations. We therefore consider that the three aforementioned sites should be allocated for residential development during the Plan period to help meet the housing needs over the Plan period. Providing the right type of housing in the right places is essential to ensure that sustainable communities continue to thrive. We support, in principle, the need for all new housing developments to provide an appropriate mix of dwelling types and sizes, taking account of existing imbalances in the housing stock, site characteristics, viability and market considerations, and, the opportunity to facilitate self-build or custom build schemes. However, each site needs to be considered on a site by site basis, based on its individual merits. Furthermore, the Council cannot place too much reliance on existing commitments as the effect of non-delivery of some developments will have a significant effect on the housing land supply position. We therefore considered that the proposed housing allocations are reassessed and that our client’s land (as set out in Section 3 below) is considered favourably as future residential development sites to meet the housing needs of the Borough in the Main Urban Area. Finally, to protect the future development opportunities post plan period, it is considered that an alternative option is to safeguard land to ensure that the revisions to the Green Belt boundary are long lasting and do not require further amendments post plan period (e.g. future-proof the revised boundaries - identifying land for development beyond the Plan period). Paragraph 139 of the NPPF states that when defining Green Belt boundaries, plans should "where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period". We therefore support the proposal to safeguard land at Warmsworth for future development in accordance with the NPPF.
Response:
The site is proposed to be allocated as Local Green Space and the justification for this is set out in the 'Local Green Space - Methodology and Sites' document. The Main Urban Area can meet its housing requirements without allocating this site. Safeguarding land relates to sites between the green belt and urban area and the Green Belt, and as such this site is not appropriate for this designation (nor is the Local Plan seeking to safeguard land).

CUSREF: 04707
Date: 27/09/2019
Name: Savills
Organisation: Savills
Representing: Warde-Aldam Estates

Comment Ref: C/Policy 6/04707/1/003
Attend Examination: Attend Hearing
Reason: We wish to discuss with the Inspector and Council our concerns regarding the Open Space allocation at Warmsworth. There is detailed evidence which will need to be discussed orally.

Area: Chapter 16: Spatial Proposals
Policy: Doncaster Main Urban Area

Tests of Soundness:
- Positively prepared
- Effective
- Justified
- Consistent with national

Comment:
We note that the Council has identified several sites proposed for housing allocations in accordance with Policy 3. However, it is considered that there are other more suitable sites, in more sustainable locations, to meet the housing needs of the Borough. Our clients own land at Warmsworth and, it is considered that their land provides logical and sensible sites to be allocated for residential development. As such, the Warde-Aldam Estates supports the future development of three sites within their ownership. The sites are known as follows: - "Mill Lane, Warmsworth" - HELAA Housing Site Reference 213 - "Common Lane, Warmsworth" - HELAA Housing Site Reference 212 & 214 - "West Farm Fields between High Road and Low Road West, Warmsworth" - HELAA Housing Site Reference 162". The three sites are set out in Figure 1 below. (SEE EMAIL FOR Figure 1 Plan of Three Sites) THIS REP IS ABOUT SITE 213 - FOR THE OTHER SITES SEE REPS 04706 / 04708 / 04709

Summary:
Site 213 including land at "West Farm Fields between High Road and Low Road West, Warmsworth" should be allocated for housing. Justification is given elsewhere in representation regarding specific local plan policies and designations.

Response:
The Site Selection Methodology, Green Belt Review and Topic Paper, and Local Green Space Methodology and Sites report all cover reasons why these sites have not been allocated for housing. Site 213 is Green Belt. Site 213 has a moderately weak case for release in the Green Belt Review. Therefore it is felt that there are no exceptional circumstances or need to release this site.
Tests of Soundness:

Comment:

Land at Mill Lane at Warmsworth (Site Reference 213 in the HELAA), was identified as a Deliverable/Developable Site in the HELAA (although it does not have planning permission). (SEE EMAIL FOR Figure 2 Aerial Image of Land at Mill Lane) The Site would provide an urban expansion in the Doncaster Main Urban Area. The site is circa 40 hectares in size and is adjacent to existing residential development, the River Don and is split in two along the easterly part of the site by the A1(M). Please see Figure 1 above for reference. The land is currently used for agriculture and is generally flat in topography. The site is under a single private ownership and whilst subject to a tenancy, the tenancy is short term and therefore the development potential is available immediately. There are trees and hedgerows located along the boundary of the site but this would not be a constraint to development. Access is available off Mill Lane. The site is located within Flood Zone 2, (although it is acknowledged that the most northerly part of the land is within Flood Zones 2 and 3, however, it is not proposed that this northern part of the land would be subject to development). See Figure 3 below for an extract from the Flood Risk Map for the area. (SEE EMAIL FOR Figure 3 Extract from the Governments Flood Risk Map - From Rivers and Sea) Furthermore the site is not subject to surface water flooding. See Figure 4 below for an extract from the Surface Water Flood Risk Map for the area. (SEE EMAIL FOR Figure 4 Extract from the Governments Flood Risk Map - From Surface Water) There are existing footpaths located to the north and south of the site and these would be proposed to be retained as part of any future scheme, and the site is not subject to any scheduled ancient monument’s or heritage assets. In conclusion, there are no known physical or technical restrictions to bringing the site forward for development. The only constraint to bringing the site forward for development in the short term is that the site is currently designated as Green Belt. Notwithstanding this, the site is considered a well contain site within the Main Urban Area to accommodate future housing development to meet the objectively assessment housing need for the Borough over the next 17 years.

Furthermore, due to the sites location and uses bounding the site, it is not considered that the site conforms with the five purposes of the Green Belt as set out in the NPPF. In accordance with paragraph 134 of the NPPF, the Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The site does not achieve any of these and the site, as set out in the HELAA is a suitable site for future residential development. We therefore respectfully request that this site (Land at Mill Lane, Warmsworth - HELAA Site 213) is identified as a housing allocation in the next draft of the Local Plan. Based on a 75% developable area, it is considered that the site could accommodate circa 850 new dwellings.

Summary:

Site 213 (Land at Mill Lane, Warmsworth), should be allocated for housing. The Site would provide an urban expansion in the Doncaster Main Urban Area. There are no known physical or technical restrictions to bringing the site forward for development. The only constraint to bringing the site forward for development in the short term is that the site is currently designated as Green Belt. Notwithstanding this, due to the sites location and uses bounding the site, it is not considered that the site conforms with the five purposes of the Green Belt as set out in the NPPF.

Response:

The site is a large urban extension that would bring the Main Urban Area very close to the south of Sprotbrough. The Green Belt Review assesses that the site has a ‘Moderately Weak’ case for inclusion in further site selection work and the Green Belt Topic Paper clarifies why their are no exceptional circumstances for releasing this site from the Green Belt.
We wish to discuss with the Inspector and Council our concerns regarding the Open Space allocation at Warmsworth. There is detailed evidence which will need to be discussed orally.

Tests of Soundness:
- Positively prepared
- Justified
- Effective
- Consistent with national

Summary:
Site 214 including land at "Common Lane, Warmsworth" should be allocated for housing. Justification is given elsewhere in representation regarding specific local plan policies and designations.

Response:
The Site Selection Methodology, Green Belt Review and Topic Paper, and Local Green Space Methodology and Sites report all cover reasons why these sites have not been allocated for housing. 214 is Green Belt. Whilst having a moderate case for removal from the Green Belt, the site performs less strongly in the Sustainability Appraisal than other sites in this area which are proposed for release from the Green Belt, and therefore it is felt that there are no exceptional circumstances or need to release this site.
We wish to discuss with the Inspector and Council our concerns regarding the Open Space allocation at Warmsworth. There is detailed evidence which will need to be discussed orally.

Tests of Soundness:

Comment:

Land at Common Lane, Warmsworth (Site References 212 & 214 in the HELAA), was also identified as a Deliverable/Developable Site (although it does not have planning permission). (SEE EMAIL FOR Figure 5 Aerial image of site at Common Lane, Warmsworth) HELAA Sites 212 & 214 combined would provide an urban expansion in the Doncaster Main Urban Area. The sites together are circa 42 hectares in size and are located adjacent to existing residential development, sports grounds and a cemetery. The land is currently used for agriculture and is generally flat in topography. The land is under a single private ownership and whilst subject to a tenancy, the tenancy is short term and therefore the development potential is available immediately. There are trees and hedgerows located along the boundary of the site and also along field boundaries throughout the site but this would not be a constraint to development. The existing trees and hedgerows could be easily accommodated within a future residential development scheme. Access is available off Common Lane, Lords Head Lane and Broomhouse Lane. Whilst part of site is adjacent to sewage works (which would reduce the developable area of an overall scheme), it would not preclude future development. As part of any future planning application, an odour study can be provided if required. The site is mainly located within Flood Zone 1, (although it is acknowledged that some of the land near Warmsworth Beck is within Flood Zones 2). Notwithstanding this, it is not proposed that the area of land subject to Flood Zone 2, would be subject to sensitive development. See Figure 6 and 7 below for extracts from the Flood Risk Map for the area. (SEE EMAIL FOR Figure 6 Extract from the Governments Flood Risk Map - From Rivers and Sea And Figure 7 Extract from the Governments Flood Risk Map - From Surface Water Flooding) The Site is not subject to any scheduled ancient monument’s or heritage assets. As such, there are no known technical or physical restrictions to bringing the site forward for residential development. The only constraint to bringing these sites forward for development in the short term is that the site is currently designated as Green Belt. Notwithstanding this, the site is considered to be a well contain site within the Main Urban Area to accommodate future housing development to meet the objectively assessment housing need for the Borough over the next 17 years. As set out at paragraph 3.18 above, is it considered that due to its location and the way that the Main Urban Area is defined as the contiguous built-up area of Doncaster comprising a number of distinct but connected districts that the site does not conform with the five purposes of the Green Belt as set out in the 2018 NPPF. We therefore respectfully request that this site is identified as a housing allocation in the next draft of the Local Plan. Based on a 75% developable area, and taking into consideration the sewage works, it is considered that the site could accommodate circa 800 new dwellings over the Plan period.

Summary:

Site 214 (Land at Common Lane, Warmsworth) should be allocated for housing. There are no known technical or physical restrictions to bringing the site forward for residential development. The only constraint to bringing these sites forward for development in the short term is that the site is currently designated as Green Belt. Notwithstanding this, the site is considered to be a well contain site within the Main Urban Area to accommodate future housing development to meet the objectively assessment housing need for the Borough over the next 17 years. It is considered that due to its location and the way that the Main Urban Area is defined as the contiguous built-up area of Doncaster comprising a number of distinct but connected districts that the site does not conform with the five purposes of the Green Belt as set out in the 2018 NPPF.

Response:

Although it scores moderately in the Green Belt review, it scores less well than other urban area sites in the Sustainability Appraisal and sufficient allocations can be made without needing to include this site. There are no exceptional circumstances which justify releasing this site from the Green Belt.
We wish to discuss with the Inspector and Council our concerns regarding the Open Space allocation at Warmsworth. There is detailed evidence which will need to be discussed orally.

We note that the Council has identified several sites proposed for housing allocations in accordance with Policy 3. However, it is considered that there are other more suitable sites, in more sustainable locations, to meet the housing needs of the Borough. Our clients own land at Warmsworth and, it is considered that their land provides logical and sensible sites to be allocated for residential development. As such, the Warde-Aldam Estates supports the future development of three sites within their ownership. The sites are known as follows: - "Mill Lane, Warmsworth" - HELAA Housing Site Reference 213 - "Common Lane, Warmsworth" - HELAA Housing Site Reference 212 & 214 - "West Farm Fields between High Road and Low Road West, Warmsworth" - HELAA Housing Site Reference 162": The three sites are set out in Figure 1 below. (SEE EMAIL FOR Figure 1 Plan of Three Sites) THIS REP IS ABOUT SITE 212 - FOR THE OTHER SITES SEE REPS 04706 / 04707 / 04708)

Site 212 including land at "Common Lane, Warmsworth" should be allocated for housing. Justification is given elsewhere in representation regarding specific local plan policies and designations.

The Site Selection Methodology, Green Belt Review and Topic Paper, and Local Green Space Methodology and Sites report all cover reasons why these sites have not been allocated for housing. 212, 213 and 214 area all Green Belt. Site 212 is within Flood Zone 2/3 and therefore inappropriate to allocate.
We wish to discuss with the Inspector and Council our concerns regarding the Open Space allocation at Warmsworth. There is detailed evidence which will need to be discussed orally.

Site 212 (Land at Common Lane, Warmsworth) should be allocated for housing. There are no known technical or physical restrictions to bringing the site forward for residential development. The only constraint to bringing these sites forward for development in the short term is that the site is currently designated as Green Belt. Notwithstanding this, the site is considered to be a well contain site within the Main Urban Area to accommodate future housing development to meet the objectively assessment housing need for the Borough over the next 17 years. As set out at paragraph 3.18 above, it is considered that due to its location and the way that the Main Urban Area is defined as the contiguous built-up area of Doncaster comprising a number of distinct but connected districts that the site does not conform with the five purposes of the Green Belt as set out in the 2018 NPPF. We therefore respectfully request that this site is identified as a housing allocation in the next draft of the Local Plan. Based on a 75% developable area, and taking into consideration the sewage works, it is considered that the site could accommodate circa 800 new dwellings over the Plan period.

Summary:
Site 212 (Land at Common Lane, Warmsworth) should be allocated for housing. There are no known technical or physical restrictions to bringing the site forward for residential development. The only constraint to bringing these sites forward for development in the short term is that the site is currently designated as Green Belt. Notwithstanding this, the site is considered to be a well contain site within the Main Urban Area to accommodate future housing development to meet the objectively assessment housing need for the Borough over the next 17 years. As set out at paragraph 3.18 above, it is considered that due to its location and the way that the Main Urban Area is defined as the contiguous built-up area of Doncaster comprising a number of distinct but connected districts that the site does not conform with the five purposes of the Green Belt as set out in the 2018 NPPF.

Response:
The site is both Green Belt and partially within the flood zone, and so it is constrained. As set out in the Green Belt Topic Paper, there are no exceptional circumstances for releasing this site from the Green Belt, and the borough can meet its housing requirement without allocating this site. See Site Selection Methodology for more information.
The Site Ref 164/430, Site Name: Land east of Warning Tongue Lane. As a resident in the area opposite the proposed development, I am obviously concerned by the environmental and increased traffic impact that will be generated by a further 275 dwellings on Warning Tongue Lane. Warning Tongue lane is already a heavily trafficked road and since the opening of the Wildlife Park the increase in traffic and traffic speed raises safety issues. I have witnessed some very dangerous incidents that could have ended in tragedy. The automatic speed warning devices, two in all seem to have little effect on vehicle speed. However, as a retired automotive engineer who represented my former employer on the issue of vehicle emissions, I am concerned that a development on the east side of Warning Tongue Lane where the land slopes down toward the M18 motorway and is effectively a valley is a catchment area for a concentration of Nitrous Oxide (NOx) fumes emitted by motorway traffic. This is a major health issue which now attracts concerns worldwide. These emissions reportedly account for 30,000 premature deaths in the UK alone. In my opinion building homes in this location will be placing residents in harm’s way, Doncaster Council and its councillors and officers will do well to understand what a political “hot potato” vehicle emissions and their effects and consequences are. I fully understand the need to increase housing stock but to build dwellings next to a motorway given the likely health issues to those who will live there will not be acceptable. I intend to make my local councillor aware of my concerns so the issue can be raised at political level.

Summary:
Re site ref 164/430 - Land East of Warning Tongue Lane (Allocated housing site) 1. Building in this location will place residents in harm’s way. 2. Combination of site topography and proximity of M18 Motorway will result in a build-up of Nitrous Oxide (NOx) 3. Increased traffic as a result of site development will cause safety issues.

Response:
The impact on the road network has been assessed through transport modelling work. Developer Requirements cover the matters that need to be done when bringing this site forward through once adopted, and include design advice which seeks to lessen the visual impact and mirror the layout opposite. More detailed matters can be refined through the planning process.
Tests of Soundness:

Justified & Consistent with national

Comment:

OBEJCTION TO THE INCLUSION OF SITES 350/407: ROSE HILL, CANTLEY/ THE AVENUE, CANTLEY ("the Site") AS BEING SUITABLE FOR DEVELOPMENT In the Guidance Notes, "soundness" is described as meaning "whether or not [the Plan] is 'fit for purpose' and 'showing good judgement'. It continues that this is to be judged against the National Planning Policy Framework's four 'tests of soundness'. Two of these tests are as follows: - "Justified - the Plan should be based on evidence, and be an appropriate strategy for the Borough when considered against other reasonable alternatives. - "Consistent with national policy - the plan should enable sustainable development and be consistent with the Government's National Planning Policy Framework (NPPF)." In a number of key respects with regard to the approach taken generally and specifically in respect of Sites 350/407: Rose Hill, Cantley/ The Avenue, Cantley ("the Site"), the Plan fails under these two tests. As background, the Site is a diverse natural environment including scrubland, mature and younger trees, flowers and grasses, and bounded in parts by hedgerows, and supports a diverse array of flora and fauna, many of which are under threat and have declining habitats in the Doncaster area. Adjoining as it does existing woodland (Sandal Beat Wood which is a Local Nature Reserve and a SSSI), the Site should be considered a (dense) urban-regenerating woodland and a Local Wildlife Site, and part of the Local Nature Reserve and SSSI, and as such the Sustainability Appraisal for this site should have identified significant negative effects for development of this site. In summary, the proposal to build 168 houses on the Site should be reversed and the site re-designated as unsuitable for development for the following reasons: - The development of the Site is not justified as the development is not based on the evidence which demonstrates that as explained in detail below, development of the Site is contrary to the policies and objectives set out in Section 10, Green Infrastructure of the Local Plan. Under the Local Plan, the Site should have been designated as an Open Space, part of a Green Infrastructure corridor and/or included within the directly adjacent LNR/SSI. In this regard, the evidence shows that development of the Site will: - Have an adverse effect on the residential amenity of the local residents and community; - Result in an unacceptably high density / over-development of the site; - Have a detrimental visual impact of the development and effect on the character of the neighbourhood; - Have an adverse impact on highway safety with a lack of ability of the existing road system to cope with additional development; - Have an adverse impact on the existing infrastructure (e.g. drainage, etc) with no ability for it to be improved; and - Cause significant adverse environmental impact and loss of biodiversity. The Local Plan recognises this as it is stated on page 282, Appendix 2 of the Local Plan that "the site has biodiversity value and forms part of a wider network of connected and biodiverse greenspaces". The Site is in fact part of, or directly adjacent to, the Sandal Beat/ Loversall Green Infrastructure Corridor and the Bawtry Forest Green Infrastructure Corridor which the Local Plan identifies as part of its Green Infrastructure assets. The Site should therefore be identified on the Policies Map as a green infrastructure asset. The development of the Site is not consistent with national policy as development of the Site is not sustainable (involving the total destruction of a diverse and rich open space used by the community and valued for its proximity to the community, beauty, tranquillity, the richness of wildlife, recreational value and the significant impact it adds to the local character of the area) as development of the Site cannot be compensated for elsewhere, or within any development of the Site. Specifically, development of the site is contrary to DMBC's objectives and policies set out in Chapter 10, namely "to maintain, protect, enhance and extend all assets in the green infrastructure network in Doncaster" and in particular: Policy 27 - Green Infrastructure: "The Council will protect, maintain, enhance and, where possible, extend or create Doncaster's green infrastructure". Contrary to Policy 27, development of the Site will not: - Create, contribute towards or enhance green corridors, including rights of way; - Provide specific and dedicated spaces for wildlife to encourage a more robust and connected network of habitats; considers tranquility and provide for generous biodiversity rich open spaces; or - Avoid loss or damage or deterioration to green infrastructure assets. Policy 28 - Protecting Open Space and Non Designated Open Space: "The Council will protect open spaces which provide important opportunities for formal and informal recreation as well as those which provide a social, cultural and ecological role". Contrary to Policy 28, development of the Site: - Does not have nature conservation improvements as a key driver; - Will not ensure green infrastructure connections are retained; and - Is not a proposal in accordance with national policy; and - Is not a proposal where there is any community support whatsoever and for which no support through public consultation has been, or will be, demonstrated. Policy 30: Ecological Networks (Strategic Policy): "Proposals will only be supported which deliver a net gain for biodiversity and protect, create, maintain and enhance the Borough's ecological networks." Development of the Site will in fact result in a net loss of biodiversity and will not protect, enhance or maintain the ecological network. Further, development of the Site is contrary to DMBC's vision set out in the Local Plan on pp15–16 which states, inter alia: - [Doncaster will be] be a place where nature flourishes and wildlife can move easily across the Borough, through a network of well-connected green infrastructure; - [We will] protect and enhance our green infrastructure especially our areas of green space for sport, recreation, play and nature. - [We will] protect and enhance biodiversity and geodiversity and provide opportunities for people to access and appreciate wildlife and nature. The Site is totally unsuitable for development and should be retained as a greenfield open space to continue to add to the pleasant environment for the local community and a rich biodiversity environment for wildlife, and for future generations to enjoy (see below and the response to Q7 below). Description of the Site (Site 350/407 Rosehill/ The Avenue, Cantley) The Site is a diverse natural environment including scrubland, mature and younger trees, flowers and grasses, and which is bounded in parts by hedgerows and trees and elsewhere by other vegetation, and supports a diverse array of flora and fauna, many of which are under threat and have declining habitats in the Doncaster area. Adjoining as it does existing woodland (Sandal Beat Wood which is a Local Nature Reserve and a SSSI), the Site should be considered a (dense) urban-regenerating woodland and a Local Wildlife Site,
and part of the Local Nature Reserve and SSSI, and as such the Sustainability Appraisal for this site should have identified significant negative effects for development of this site. Further, the Site should have been identified in the Green Space Audit as being a site of local community value as it is publicly accessible and is widely used by horse riders, joggers, bird watchers, walkers and residents for recreation. In this regard, the green space is in direct proximity to the community it serves and is demonstrably special to the local community (as evidenced by the petitions and local activism mobilised to protect the Site). The Site has been identified by the local community (which has vociferously objected to development of this site) as a local green space being significant for a number of reasons including prominence to the community, beauty, tranquility, the richness of its wildlife, recreational value and the significant impact it adds to the local character of the area. The site should therefore have been given a UDP Open Space Policy Area designation in the Local Plan. Further being directly adjacent to the Sandal Beat LNR/SSSI, the site is on (or should be regarded as being part of) the Sandal Beat/ Loversall Green Infrastructure Corridor and the Bawtry Forest Green Infrastructure Corridor and should on this basis alone, not be developed as it forms an important part of the green infrastructure and the ecological networks and diversity in Doncaster. In this regard, it should be noted that the Local Plan recognises this as it is stated on page 282, Appendix 2 of the Local Plan that "the site has biodiversity value and forms part of a wider network of connected and biodiverse greenspaces".

The Site should be designated as an Open Space, part of a Green Infrastructure corridor and/or included within the directly adjacent LNR/SSSI. Evidence shows development will have adverse impacts on: residential amenity; unacceptable high density/over development; detrimental visual impact on character of the neighbourhood; highway safety concerns; lack of drainage infrastructure; environmental impacts and loss of biodiversity. The allocation is not consistent with national policy as development does not enable sustainable development. On the contrary, development of the Site will totally destroy a valuable biodiverse habitat, local green infrastructure asset and corridor, and open space. There is no mechanism by which the destruction of the Site and the habitat loss can be compensated for, or a biodiversity net gain be achieved. The following changes should therefore be made to the Local Plan: - The Site should be designated as an Open Space, part of a Green Infrastructure corridor and/or included within the directly adjacent LNR/SSSI. - The Site should be identified on the Policies Map as a green infrastructure asset. - The Doncaster 5-Year Deliverable Housing Land Supply Statement should be amended to remove the Site as land suitable for, or earmarked for, development. - The Doncaster Local Plan (and any and all other documents associated with the plan) should be amended to remove the Site as land suitable for, or earmarked for, development. - The Doncaster Local Plan (and any and all other documents associated with the plan) should be amended to protect the Site as a local community asset and for it to remain as an Open Space.

Summary:

Objects to housing site allocation Ref 350/407 - Rosehill, Cantley. The plan fails the 2 soundness tests in respect to being justified and consistent with national policy. The Sa should have identified significant negative effects for the site in respect to biodiversity as the site should be considered as a dense urban-regenerating woodland and a Local Wildlife Site, and part of the Local Nature Reserve and SSSI. Development of the site is contrary to the Green Infrastructure policies in Chapter 10 of the Local Plan itself. Should be designated as open space and part of a Green Infrastructure corridor and or included in the adjacent LNR/SSSI. Evidence shows development will have adverse impacts on: residential amenity; unacceptable high density/over development; detrimental visual impact on character of the neighbourhood; highway safety concerns; lack of drainage infrastructure; environmental impacts and loss of biodiversity. The allocation is not consistent with national policy and is not sustainable. The site is contrary to the Local plan policies 27, 28, and 30. The site is also incapable of supporting the volume of dwellings proposed for a variety of reasons being bounded on the eastern/ south-eastern side by a railway line, by the LNR/SSSI of Sandal Beat Wood on the northern side, and Doncaster racecourse on the western side. There is therefore no access possible to the site other than via two small access roads from the existing south-westerly development. Any dwellings built on the site would not therefore be accessible except through the small road network which currently exists and which is inadequate to service the combined existing and proposed further development and provide safe and adequate access to/from Bawtry Road. This road network is unable to be changed due to its layout and development of the Site will therefore result in unacceptable and unreasonable traffic problems for residents as noted by the Local Plan itself: "the concentration of outbound traffic at peak times is likely to result in excessive queuing on Rose Hill and potential unacceptable queuing and delays for motorists." Further, due to the access issues referred to above and the scale of development proposed, development of the Site will involve significant and severe disruption and disturbance to the amenity of the local residents for a long period of time (according to table H2(A), a period of 10 years) and is totally unacceptable and inappropriate. The tranquility and quiet environment of the existing development will be destroyed by development of the Site. Such development over a long period of time will also undoubtedly have a significant adverse impact on the adjoining LNR/SSSI and the green infrastructure corridor which runs through/ adjacent to the Site.

DMBC has acknowledged that the site was "previously unavailable for development" and is, it seems to the local community, only now proposed for development because DMBC, the owner of the site, has decided to sell it as a means of generating funds. A site should only be developed if it is appropriate to do so rather than, for example, to generate funds for DMBC. The significant negative effects of development on this site would, absent DMBC’s ownership of the site and desire to generate funds, have resulted in the Site being identified as unsuitable for development. PROPOSED CHANGE As set out in the answer to Q6 with regard to Sites 350/407: Rose Hill, Cantley/ The Avenue, Cantley ("the Site"). - Allocation of the Site for development is not justified as this fails to take into account the evidence which shows that development is contrary to a number of policies set out in the Local Plan. Development of such a greenfield site which serves as a rich and diverse habitat and is directly adjacent to an LNR/SSSI and is part of directly adjacent to a green infrastructure corridor. Further, the Site is a valued community asset, and development of the Site is inappropriate given the local infrastructure and significant detrimental impact on the local community and the existing neighbouring development which would occur. Development of the Site is not an appropriate strategy when considered against other reasonable alternatives. - Allocation of the Site for development is not consistent with national policy as development does not enable sustainable development. On the contrary, development of the Site will totally destroy a valuable biodiverse habitat, local green infrastructure asset and corridor, and open space. There is no mechanism by which the destruction of the Site and the habitat loss can be compensated for, or a biodiversity net gain be achieved. The following changes should therefore be made to the Local Plan: - The Site should be designated as an Open Space, part of a Green Infrastructure corridor and/or included within the directly adjacent LNR/SSSI. - The Site should be identified on the Policies Map as a green infrastructure asset. - The Doncaster 5-Year Deliverable Housing Land Supply Statement should be amended to remove the Site as land suitable for, or earmarked for, development. - The Doncaster Local Plan (and any and all other documents associated with the plan) should be amended to remove the Site as land suitable for, or earmarked for, development. - The Doncaster Local Plan (and any and all other documents associated with the plan) should be amended to protect the Site as a local community asset and for it to remain as an Open Space.
Response:
The site is being disposed of by Doncaster Council for housing development and has been marketed accordingly. The Developer requirements show the matters that must be addressed in delivering this site, and it has also been subject to a development brief which discussed matters in detail, when the site was marketed. The site has long been earmarked for development and is an urban site in an attractive location. It is available, deliverable and developable. It does not function now as a public open space, even if accessible to the public and used recreationally at present, nor is it earmarked for this use in future by the Council as landowner.

Comment Ref: C/Policy 6 - Site 494/05208/1/007
Name: Spawforths
CUSREF: 05208
Date: 30/09/2019
Organisation: Spawforths
Representing: Avant Homes Ltd

Reason:
Area: Chapter 16: Spatial Proposals
Policy: Doncaster Main Urban Area

Tests of Soundness:

Comment:
(This rep is for this this site only - see other reps for other two sites) 6.23. Avant Homes objects that Site 494 at Green Lane, Scawthorpe site is not allocated and should be identified as a housing site. Avant Homes object that the Council conclude that the site performs the same as other proposed housing allocations but that this site is not needed as "sufficient allocations are now identified". 6.24. Avant Homes is particularly concerned that there is an under provision of housing in Doncaster, which the spatial distribution suggests should be accommodating at least 50% of new homes. Doncaster is currently short of that requirement, and as indicated above Avant Homes consider that the yield of a number of sites within Doncaster Main Urban Area have been significantly over estimated. Doncaster is the focus for economic and housing growth and should be accommodating more housing. This need cannot be met in other settlements. 6.25. The site at Green Lane, Scawthorpe is located on the western edge of Doncaster close to major employment opportunities along the A1(M). The site is therefore in a sustainable and appropriate location for housing growth. New housing should be located on the western side of Doncaster to ensure Doncaster maximises the economic growth potential of these major inward investors. 6.26. The Green Lane, Scawthorpe site should therefore be allocated to deliver housing in the short term. A robust Green Belt boundary can be created utilising Green Lane and the Roman Road along the western boundary. This is a distinctive and long term urban boundary. To the south of the site is the proposed Broad Axe Field housing allocation (Site 234) 6.27. The site can be accessed through Green Lane and the adjacent Broad Axe Field housing allocation. 6.28. Avant Homes considers the proposed site is available, suitable and achievable and is therefore in accordance with the Framework a deliverable site able to come forward in the short term.

Technical studies are ongoing but initial assessments demonstrate the site's deliverability. 6.29. The deliverability and benefits of the Green Lane, Scawthorpe site are contained in the attached Advocacy Report: (SEE EMAIL FOR document) Proposed Change 6.37. To overcome the objection and address soundness matters, the Council should: - Allocate: o Site 494: Green Lane, Scawthorpe, Doncaster

Summary:
Site 494 should be allocated. Object that the council conclude that the site performs the same as others but is not needed as "sufficient allocations are now identified". There is an under provision of housing in Doncaster which should have 50% of new homes. There is currently an under supply and the yields have been significantly over - estimated. The needs cannot be met in other settlements. 494 is located close to employment opportunities along the A1(M). It is therefore sustainable and an appropriate location for housing growth. New housing should be located on the western side of Doncaster to ensure Doncaster maximises the economic growth potential of these major inward investors. 494 can deliver housing in the short term, and a robust Green Belt boundary can be created utilising Green Lane and Roman Ridge. To the south is the proposed allocation 234. The site can be accessed through Green Lane and the adjacent site 234. The site is available, suitable and achievable and therefore in accordance with the framework. Technical studies are ongoing but initial assessments demonstrate the sites deliverability.

Proposed change: 494 should be allocated

Response:
The Main Urban Area will provide more than 50% of the total allocated 15 year supply in the borough. Densities and build out rates were agreed with stakeholders early in the process. The Housing Topic Paper explores this further.
6.1. Avant Homes objects to Policy 6 and the proposed distribution of housing and that the following sites are not proposed allocations: Site 494: Green Lane, Scawthorpe - HELAA Site 1036: Melton Road, Newton - HELAA Site (871): Wadworth Hill, Wadworth. These sites are summarised below and technical information and advocacy reports will be submitted shortly. Test of Soundness 6.3. Avant Homes considers that the Local Plan is currently unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy. 6.4. Avant Homes is concerned that the Local Plan is not producing sufficient homes across the Borough. Further to comments in relation to Policy 3 Avant Homes recommends that further sites are identified to meet and exceed the requirement but also to provide a sufficient buffer to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the Framework requirements for the plan to be positively prepared and flexible. 6.5. Avant Homes is concerned that the proposed distribution of new homes does not reflect the spatial strategy, but importantly does not address the focus for economic and housing growth across the Sheffield City Region and Yorkshire and Humber as a whole. 6.6. The proposed distribution against the Council’s own targets shows a deficiency and a significant under-provision in: Doncaster - Adwick, Conisbrough - Denaby, Mexborough, Thorne, Moorends, Sprotbrough, Tickhill - Bawtry. 6.7. Avant Homes, as explained in response to Policy 2 and the spatial strategy considers that the spatial strategy is incorrect, that it does not provide for the growth of the Borough and does not reflect the role, function and location of the settlements. 6.8. Avant Homes, as explained in response to Policy 2 and 3, considers that there needs to be further provision of housing and a slightly amended approach to the spatial strategy, which focuses growth towards Doncaster. There should be further growth of Rossington to address regeneration and the provision of new infrastructure. There should be growth in Thorne-Moorends, and a regeneration focus in Carcroft-Skellow which should elevate the status of the settlement commensurate to its role and function. New housing should be provided in Tickhill to address the current under provision. Wadworth should accommodate some new housing to reflect its role and function and provision should also be made in the villages to address the rural economy. 6.9. Avant Homes is particularly concerned that there is an under-provision of housing in Doncaster, which the spatial distribution, established in policy 2, suggests should be accommodating at least 50% of new homes. This would equate to 9200 homes based on the requirement of 18400. The total permissions and allocations in Doncaster equate to 7441 homes (not accounting for completions). This is significantly short of the requirement for Doncaster, further the main urban area is identified as the focus for economic and housing growth and should be accommodating more housing. 6.10. Further Avant Homes are concerned about the deliverability of a number of allocations within the main urban areas. These include but are not limited to the following sites: Site 838, 843, 984. There are no completions on site and the site is not currently being developed. Further the council have been unable to produce any further deliverability information to support its inclusion within the Doncaster 5 Year Deliverable Housing Land Supply Statement. As a minimum the forecast contribution to the local plan should be reduced. 6.12. Avant Homes object to the allocation of site 843. Avant Homes consider that the delivery rates for this site are unrealistic based on performance at the site. The Residential Land Availability Report states that completions for the last year amounted to 39 dwellings. The local plan is suggesting a delivery rate of 70 dwellings per year. This is significantly short of what has been achieved at this site or indeed other sites in Doncaster according to data in the residential land availability report. 6.13. Avant Homes object to the allocation of Site 984. Avant Homes consider that the delivery rates for this site are unrealistic. The Local Plan indicates that this is an outline permission. There are significant constraints, it is a brownfield site that is entirely within Flood Zone 3. However the Local Plan is assuming a delivery rate of 56 dwellings per annum in the first five years and 64 dwellings per annum in year 6-10. This is overly optimistic, and not consistent with the planning status, constraints and likely viability issues associated with site. 6.14. Based on the above it is clear that the deliverability and delivery rates of some of the sites in Doncaster ought to be reviewed to ensure that they reflect the site specific circumstances. Further allocations are required in Doncaster to ensure that the Plans strategy can be delivered. 6.15. As indicated in response to Policy 2 Avant Homes are also concerned that the Plan does not provide sufficient support for development in Defined Villages. Avant Homes consider that in line with the provision of the Framework, paragraph 78, which is clear that to promote sustainable development in rural areas, ‘Housing should be located where it will enhance or maintain the vitality of rural communities. Planning Policies should identify opportunities for villages to grow and thrive, especially where this will support local services’. 6.16. Furthermore, there does not appear to be any safeguarded sites identified within the Local Plan. This is concerning given Policy 6 states that the Plan will designated Reserve Development Sites, yet those identified are not considered to be deliverable within the Plan Period due to significant constraints relating to flood risk and HS 2 Safeguarding, thus could not be relied on to maintain the supply of housing should other sites fail to deliver in the Plan period. As indicated in response to Policy 3 Avant Homes suggest, that safeguarded sites be proposed, to provide additional flexibility in accordance with national guidance. 6.17. Avant Homes consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 6.18. However, Avant Homes consider that with the proposed allocations and the deletion or adjustment in anticipated delivery within the plan period of sites 838, 843, and 984 that the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 6.19. To overcome the objection and address soundness matters, the Council should 6.20. Avant Homes consider that the following sites should be deleted or the yield within the plan period...
Summary:
Object to policy 6 and the proposed distribution of housing, and that the following sites are not allocated:  
- Site 494: Green Lane, Scawthorpe - HELAA Site 1036: Melton Road, Newton  
- HELAA Site (871): Wadworth Hill, Wadworth  
The Local Plan is not producing sufficient homes for the borough. Further to comments on Policy 3, further sites should be identified to meet and exceed the requirement and provide a suitable buffer to deal with any under delivery which is likely to occur from some sites. This ensures the plan is positively prepared and flexible. The distribution does not reflect the spatial strategy, but importantly does not address the focus for economic growth in the SCR and Yorkshire and the Humber as a whole. There is a deficiency and under provision in Doncaster; Adwick; Conisbrough - Denaby; Mexborough; Thorne - Moorends; Sprotbrough; Tickhill and; Bawtry. The plan does not provide for the growth of the borough and does not reflect the role, function and location of settlements.
Further housing is needed and an amended approach to the spatial strategy too. There should be further growth of Rossington to address regeneration and provide new infrastructure, as well as growth in Thorne - Moorends, and regeneration focus in Carcroft - Skellow should elevate the settlement to a Main Town. New housing should be provided in Tickhill as there is under provision here. Wadworth should accommodate some housing to reflect its role and function and provision should be made in the villages to address the rural economy. 9,200 new homes should be in the urban area according to Policy 2 and a total of 18,400 homes over the plan period. The total is 7,441 which is significantly short of this requirement. The urban area is identified as a focus for economic and housing growth and should accommodate more housing. There is also concern about deliverability in this location. Object to the allocation of 838 as the RLA indicates no completions and the site is not currently being developed. There is no information to support it in the 5 year supply statement. As a minimum the forecast contribution should be reduced. Object to the allocation of site 843 as the delivery rates for the site are unrealistic. Completions 17/18 were only 39, but 70 per annum is suggested - over what has been achieved on this and other sites. Object to the allocation of 984 as the delivery rates are unrealistic and the site is brownfield in flood zone 3 but assumes 56dpa in the first 5 years and 64dpa thereafter. Likely to be viability issues also. Further allocations are therefore required and delivery rates reviewed. There is not sufficient support for defined villages, opportunities should be identified for housing in these, especially when it will support local services in accordance with NPPF para. 78. There should also be safeguarded land identified. The policy is not justified or consistent with the framework and the Local Plan is therefore not sound - however with the proposed deletion or delivery adjustment for sites 838, 843 and 984, the plan can be found sound. Proposed change: delete or reduce the yield of 838, 843 and 984 and allocate 494, 1036 and 871.

Response:
As set out in the Housing Topic Paper, a buffer of additional sites is unnecessary as the housing calculations do not factor in a number of additional sources of supply, such as windfalls, small sites of 1 - 4 units, housing delivering beyond the plan period and the prospect of additional housing at the airport (amongst other sources). These thus create a buffer. Aside from Mexborough, the Main Urban Area and all the Main Towns mentioned are only short against the top of their ranges. As the Housing Topic Paper explains, not all of these settlements need to meet the top of their range, as long as the overall number balances out at approx. 90% of housing in these two areas, which it does. In Bawtry and Sprotbrough the shortfall against the target is relatively small and in Tickhill there are no other suitable sites. Policy 2 and 3 allow for some potential development in the defined villages, but no allocations are to be made in the Defined Villages. However, overall the borough is delivering enough housing across the plan period, and shortfalls are made up for in other areas. There is focus on the Main Urban Area, with over 50% of housing being delivered here between 2018 - 33. The Housing Topic Paper and Site Selection Methodology justify the approach to housing distribution and assess why sites have been omitted or included. Figures are related to allocations and not the total plan period supply, and in this case the Main Urban Area is delivering above 50% of the boroughs total allocations. The Council demonstrate three years of completions 2015 - 18 and supply for the final two years 2033 - 35. Matters of build outs and any relevant delivery amendments are covered in the Site Selection Methodology.
Melton Road, Newton (site 1036) is a proposed housing allocation. Technical studies are ongoing but initial assessments demonstrate the site’s deliverability. The site is available, suitable and achievable and able to come forward in the short term. To overcome the objection and address soundness issues, the Council should:

- Allocate:  
  o New Site: Melton Road, Newton, Doncaster

Summary:

Melton Road, Newton (site 1036) is a proposed housing allocation. Technical studies are ongoing but initial assessments demonstrate deliverability. The site is available, suitable and achievable and able to come forward in the short term. To overcome the objection and address soundness issues, the site should be allocated. Advocacy document provided.

Response:

Site 1036 is a large Green Belt site which scores moderately weakly in the Green Belt Review and is also adjacent to Cusworth Hall. It’s inclusion would impact the Green Belt and the setting of Cusworth Hall, and it is not deemed that there are exceptional circumstances to release this site from the Green Belt, nor is the site required to help meet the housing requirement for the Main Urban Area.
6.1. Avant Homes objects to Policy 6 and the proposed distribution of housing and that the following sites are not proposed allocations: - Site 494: Green Lane, Scawthorpe - HELAA Site 1036: Melton Road, Newton - HELAA Site (871): Wadworth Hill, Wadworth. These sites are summarised below and technical information and advocacy reports will be submitted shortly. Test of Soundness 6.3. Avant Homes considers that the Local Plan is currently unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 6.4. Avant Homes is concerned that the Local Plan is not producing sufficient homes across the Borough. Further to comments in relation to Policy 3 Avant Homes recommends that further sites are identified to meet and exceed the requirement but also to provide a sufficient buffer to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the Framework requirements for the plan to be positively prepared and flexible. 6.5. Avant Homes is concerned that the proposed distribution of new homes does not reflect the spatial strategy, but importantly does not address the focus for economic and housing growth across the Sheffield City Region and Yorkshire and Humber as a whole. The proposed distribution against the Council’s own targets shows a deficiency and a significant under provision in: - Doncaster - Adwick - Conisbrough - Denaby - Mexborough - Thorne - Moorend - Sprotbrough - Tickhill - Bawtry. 6.7. Avant Homes, as explained in response to Policy 2 and the spatial strategy considers that the spatial strategy is incorrect, that it does not provide for the growth of the Borough and does not reflect the role, function and location of the settlements. Avant Homes, as explained in response to Policy 2 and 3, considers that there needs to be further provision of housing and a slightly amended approach to the spatial strategy, which focusses growth towards Doncaster. There should be further growth of Rossington to address regeneration and the provision of new infrastructure. There should be growth in Thorne-Moorends, and a regeneration focus in Carcroft-Skellow which should elevate the status of the settlement commensurate to its role and function. New housing should be provided in Tickhill to address the current under provision. Wadworth should accommodate some new housing to reflect its role and function and provision should also be made in the villages to address the rural economy. 6.9. Avant Homes is particularly concerned that there is an under provision of housing in Doncaster, which the spatial distribution, established in policy 2, suggests should be accommodating at least 50% of new homes. This would equate to 9200 homes based on the requirement of 18400. The total permissions and allocations in Doncaster equate to 7441 homes (not accounting for completions). This is significantly short of the requirement for Doncaster, further the main urban area is identified as the focus for economic and housing growth and should be accommodating more housing. 6.10. Further Avant Homes are concerned about the deliverability of a number of allocations within the main urban areas. These include but are not limited to the following sites: 6.11. Further Avant Homes object to the allocation of site S83, which whilst benefiting from an extant permission the Residential Land Availability Report 2018 indicates that there are no completions on site and the site is not currently being developed. Further the council have been unable to produce any further deliverability information to support its inclusion within the Doncaster 5 Year Deliverable Housing Land Supply Statement. As a minimum the forecast contribution to the local plan should be reduced. 6.12. Avant Homes object to the allocation of site S84. Avant Homes consider that the delivery rates for this site are unrealistic based on performance at the site. The Residential Land Availability Report states that completions for the last year amounted to 39 dwellings. The local plan is suggesting a delivery rate of 70 dwellings per year. This is significantly over what has been achieved at this site or indeed other sites in Doncaster according to data in the residential land availability report. 6.13. Avant Homes object to the allocation of Site S94. Avant Homes consider that the delivery rates for this site are unrealistic. The Local Plan indicates that this is an outline permission. There are significant constraints, it is a brownfield site that is entirely within Flood Zone 3. However the Local Plan is assuming a delivery rate of 56 dwellings per annum in the first five years and 64 dwellings per annum in year 6-10. This is overly optimistic, and not consistent with the planning status, constraints and likely viability issues associated with site. 6.14. Based on the above it is clear that the deliverability and delivery rates of some of the sites in Doncaster ought to be reviewed to ensure that they reflect the site specific circumstances. Further allocations are required in Doncaster to ensure that the Plans strategy can be delivered. 6.15. As indicated in response to Policy 2 Avant Home are also concerned that the Plan does not provide sufficient support for development in Defined Villages. Avant Homes consider that in line with the provision of the Framework, paragraph 78, which is clear that to promote sustainable development in rural areas, ‘Housing should be located where it will enhance or maintain the vitality of rural communities. Planning Policies should identify opportunities for villages to grow and thrive, especially where this will support local services’. 6.16. Furthermore, there does not appear to be any safeguarded sites identified within the Local Plan This is concerning given Policy 6 states that the Plan will designated Reserve Development Sites, yet those identified are not considered to be deliverable within the Plan Period due to significant constraints relating to flood risk and HS 2 Safeguarding, thus could not be relied on to maintain the supply of housing should other sites fail to deliver in the Plan period. As indicated in response to Policy 3 Avant Homes suggest, that safeguarded sites be proposed, to provide additional flexibility in accordance with national guidance. 6.17. Avant homes consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 6.18. However, Avant Homes consider that with the proposed allocations and the deletion or adjustment in anticipated delivery within the plan period of sites S83, S84, and S94 that the Local Plan can be found sound. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 6.19. To overcome the objection and address soundness matters, the Council should 6.20. Avant Homes consider that the following sites should be deleted or the yield within the plan period...
Summary:

Object to policy 6 and the proposed distribution of housing, and that the following sites are not allocated: - Site 494: Green Lane, Scawthorpe - HELAA Site 1036: Melton Road, Newton - HELAA Site 871: Wadworth Hill, Wadworth  The Local Plan is not producing sufficient homes for the borough. Further to comments on Policy 3, further sites should be identified to meet and exceed the requirement and provide a suitable buffer to deal with any under delivery which is likely to occur from some sites. This ensures the plan is positively prepared and flexible. The distribution does not reflect the spatial strategy, but importantly does not address the focus for economic growth in the SCR and Yorkshire and the Humber as a whole. There is a deficiency and under provision in Doncaster; Adwick; Conisbrough - Denaby; Mexborough; Thorne - Moorends; Sprotbrough; Tickhill and; Bawtry. The plan does not provide for the growth of the borough and does not reflect the role, function and location of settlements. Further housing is needed and an amended approach to the spatial strategy too. There should be further growth of Rossington to address regeneration and provide new infrastructure, as well as growth in Thorne - Moorends, and regeneration focus in Carcroft - Skellow should elevate the settlement to a Main Town. New housing should be provided in Tickhill as there is under provision here. Wadworth should accommodate some housing to reflect its role and function and provision should be made in the villages to address the rural economy.  9,200 new homes should be in the urban area according to Policy 2 and a total of 18,400 homes over the plan period. The total is 7,441 which is significantly short of this requirement. The urban area is identified as a focus for economic and housing growth and should accommodate more housing. There is also concern about deliverability in this location. Object to the allocation of 838 as the RLA indicates no completions and the site is not currently being developed. There is no information to support it in the 5 year supply statement. As a minimum the forecast contribution should be reduced. Object to the allocation of site 843 as the delivery rates for the site are unrealistic. Completions 17/18 were only 39, but 70 per annum is suggested - over what has been achieved on this and other sites. Object to the allocation of 984 as the delivery rates are unrealistic and the site is brownfield in flood zone 3 but assumes 56dpa in the first 5 years and 64dpa thereafter. Likely to be viability issues also. Further allocations are therefore required and delivery rates reviewed. There is not sufficient support for defined villages, opportunities should be identified for housing in these, especially when it will support local services in accordance with NPPF para. 78. There should also be safeguarded land identified. The policy is not justified or consistent with the framework and the Local Plan is therefore not sound - however with the proposed deletion or delivery adjustment for sites 838, 843 and 984, the plan can be found sound. Proposed change: delete or reduce the yield of 838, 843 and 984 and allocate 494, 1036 and 871.

Response:

As set out in the Housing Topic Paper, a buffer of additional sites is unnecessary as the housing calculations do not factor in a number of additional sources of supply, such as windfalls, small sites of 1 - 4 units, housing delivering beyond the plan period and the prospect of additional housing at the airport (amongst other sources). These thus create a buffer. Aside from Mexborough, the Main Urban Area and all the Main Towns mentioned are only short against the top of their ranges. As the Housing Topic Paper explains, not all of these settlements need to meet the top of their range, as long as the overall number balances out at approx. 90% of housing in these two areas, which it does. In Bawtry and Sprotbrough the shortfall against the target is relatively small and in Tickhill there are no other suitable sites. Policy 2 and 3 allow for some potential development in the defined villages, but no allocations are to be made in the Defined Villages. However, overall the borough is delivering enough housing across the plan period, and shortfalls are made up for in other areas. There is focus on the Main Urban Area, with over 50% of housing being delivered here between 2018 - 33. The Housing Topic Paper and Site Selection Methodology justify the approach to housing distribution and assess why sites have been omitted or included. Figures are related to allocations and not the total plan period supply, and in this case the Main Urban Area is delivering above 50% of the boroughs total allocations. The Council demonstrate three years of completions 2015 - 18 and supply for the final two years 2033 - 35. Matters of build outs and any relevant delivery amendments are covered in the Site Selection Methodology.
16.1. Metroland is supportive of Policy 6 and its allocation of the Alverley Lane, Balby, Doncaster site (site 115). However Metroland are concerned about the justification for some of the site specific requirements set out within Appendix 2 Development Requirements Site 115. Metroland therefore consider that the Development Requirements are unsound. Test of Soundness 16.2. Metroland considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 16.3. Metroland supports the allocation of the Alverley Lane, Balby and its identification as a proposed housing site. An Advocacy Report and illustrative masterplan is attached to these representations which demonstrates the site's deliverability. An overview of the proposals is provided in Section 17. 16.4. The proposal is an appropriate site to provide for the housing needs of Doncaster in the short term. The allocation of the site would confirm its potential to help continue the provision of a balanced housing supply in the Borough in sustainable locations. The site can deliver a full range and mix of housing and a sustainable community. Development of the site would deliver housing and affordable housing. Doncaster needs to have a robust housing trajectory and the site at Alverley Lane, Balby would assist with this delivery in the short term. The site is situated within a prime location suitable for residential development and as such would facilitate the development of land in a more effective and efficient manner. Development of the site would not harm or undermine the areas wider policy objectives, but seeks to reinforce the need to develop sites within sustainable locations as a priority. 16.5. The site is available, suitable and achievable and therefore deliverable in accordance with the Framework. 16.6. Metroland are concerned that the Development Requirements established in appendix 2 of the Local Plan are not sufficiently effective or justified. There is a requirement to for a set back from the southern boundary. The extent of the setback is unclear and could potentially impact on the site capacity and deliverability. It is not clear what density or net to gross ratio has been assumed by the council when calculating the capacity of the site. However it is clear that it is lower than the gross to net ratio and or density that form the viability assumptions in the whole plan viability report. Thus there may be a requirement for site specific viability testing. 16.7. Further Metroland are concerned that the sites locations is now considered to be in a Medium to high value area. It was previously identified as being within a low value area. There is therefore a requirement for 23% affordable housing. The adjacent area is identified within a medium value area. The viability report considers average sales values of #2,100 per sq.m. for medium value areas, and #2,350 per sq.m. in high value area. Metroland are concerned that the identification of the site within a medium -high value area does not reflect the sales values expected to be achieved at site 115. 16.8. Metroland is concerned that with all the policy requirements the local plan details, and limited refinement of value areas that this could undermine the delivery of housing through increased need for viability assessments, and the associated impact on delivery through extended negotiations. The Council should review the baseline aspirations of individual policies and the policies in combination to ensure that they are not too high and ensure that the requirements are well tested. 16.9. Metroland consider that the requirements in their current form are not fully justified or effective. The plan in its current form could fail to deliver sustainable development in accordance with the policies in the framework. 16.10. In these circumstances, Metroland do not consider the Doncaster Local Plan, in its current form, to be sound. 16.11. However, Metroland consider that with increased clarity, and justification for the development requirements and a review viability evidence and subsequent review of the sites capacity, the Local Plan can be found sound. The Metroland will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 16.12. To overcome the objection and address soundness matters, the Council should: 16.13. Review the development requirements, site capacity and whole plan viability to provide greater clarity and justification for the site requirements.

Summary:
Site 115 (allocated site) supports allocation of site. Appendix 2 - Developer Requirements 1. Site 115 - concerned re justification of requirements: 2. Set back & affordable housing level. 3. All impact on deliverability. 4. Suggest review of requirements and justification. Affordable Housing: Concerned that site is identified as being in a Medium to High value Area (23% affordable hsg) where it was previously a 'low value area'.

Response:
Support for allocation of the site is welcomed. The developer requirements are considered justified and set out some key principles to help guide successful planning applications in due course. See response to Policy 8 in respect to the viability testing evidence base.
4.1. Metroland is supportive of Policy 6 and its allocation of the Alverley Lane, Balby; MUA site (Site 115). Test of Soundness 4.2. Metroland considers that the Doncaster Local Plan - Publication Version 2015-2035 is sound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 4.3. Metroland supports the allocation of their site at Alverley Lane, Balby; MUA and its identification as a proposed housing site. Technical studies are ongoing but initial assessments demonstrate the site’s deliverability. 4.4. Metroland considers the proposed housing allocation is available, suitable and achievable and is therefore in accordance with the Framework a deliverable site able to come forward in the short term. 4.5. The deliverability and benefits of the Alverley Lane, Balby; MUA are set out in Section 18 and summarised below. 4.6. The proposal is an appropriate site to provide for the housing needs of Doncaster in the short term. The allocation of the site would confirm its potential to help continue the provision of a balanced housing supply in the Borough in sustainable locations. The site can deliver a full range and mix of housing and a sustainable community. Development of the site would deliver housing and affordable housing. Doncaster needs to have a robust housing trajectory and the site at Alverley Lane, Balby would assist with this delivery in the short term. The site is situated within a prime location suitable for residential development and as such would facilitate the development of land in a more effective and efficient manner. Development of the site would not harm or undermine the areas wider policy objectives, but seeks to reinforce the need to develop sites within sustainable locations as a priority. 4.7. Metroland would reiterate that Doncaster have recognised that some greenbelt land will need to be released in order to meet its housing needs. As indicated in the Advocacy previously submitted the land at Alverley Lane, Balby does not perform any of the five green belt functions, as set out in the Framework (paragraph 134), and its release from the greenbelt can be justified. 4.8. The submitted Advocacy document also summarised the technical work that had been undertaken. This concludes that a safe and suitable access can be made and confirms the highways networks ability to accommodate the proposed development. With regards to flooding and drainage the site is in Flood Zone 1 and is not in an area at risk from flooding. The drainage work identified a drainage strategy for the site. It confirmed attenuation was required on site and that the proposed location was suitable. The ecological survey confirmed that there are no ecological constraints and that the site is of low ecological value. Development of the site offers the opportunity to enhance the ecological value through new planting. Further there are no known infrastructure capacity issues that would preclude the development of this site. 4.9. The proposed allocation policy should therefore be flexible to reflect this evidence base and ensure delivery of the scheme. The site is available, suitable and achievable and therefore deliverable in accordance with the Framework. 4.10. Metroland supports the allocation of Site 115 consider that the Policy 6 is Sound in this regard. Proposed Change No Change

Summary:
Policy 6 - Housing Allocations. Supports site 115 Alverley lane Balby as a proposed allocation (includes detailed advocacy report).

Response:
Support welcomed
17.1. Metroland have previously submitted an Advocacy Report and illustrative masterplan to support the allocation of the Land at Alverley Lane, Balby. This submission is reiterated here to support of Housing Site 115. Justification 17.2. Metroland supports the allocation of the Alverley Lane, Balby site. An Advocacy Report and illustrative masterplan has been previously submitted and is re-attached to these representations. The Advocacy Report demonstrates the site’s deliverability. 17.3. Metroland considers the proposed housing allocation is available, suitable and achievable and therefore in accordance with the Framework. It is a deliverable site that is able to come forward in the short term. 17.4. The deliverability and benefits of the Alverley Lane, Balby is as follows: Overview of proposals 17.5. The site is located on the edge of an established residential area and benefits from easy access to the full range of services and facilities located within Balby, Doncaster. The site lies adjacent to the Edlington/Deanne Valley Railway Embankment Local Wildlife Site. The site is approximately 6.5ha gross and could accommodate in the region of 220 new homes. (SEE EMAIL FOR Plan of Site) Deliverability 17.6. The site at Alverley Lane provides a development opportunity that is available, suitable and achievable and therefore it is considered that the site is deliverable, in accordance with national planning policy and guidance. It is promoted by Metroland Ltd with interest in development from Persimmon Homes and Ongo Homes and is deliverable within the plan period. Availability 17.7. The land is being promoted by Metroland Ltd as landowner. The site is therefore available in accordance with the Framework and the National Planning Practice Guidance (PPG). 17.8. The proposed development can make an efficient and attractive use of the land. The site represents an excellent opportunity for future housing and development. This site allows housing to be delivered within an appropriate and sustainable location within Doncaster. Suitability 17.9. The site is located in a highly sustainable location and has residential development to the north, east and west. The site is within easy walking distance to Springwell Lane Local Centre with a range of facilities provided there as well as greater facilities within Doncaster Town Centre, a short bus ride away. There are a large number of primary and secondary schools in the vicinity of the site. 17.10. The site is well served by buses providing opportunities for sustainable travel to work in Doncaster and beyond with access to Doncaster Railway Station. 17.11. The development will provide additional quality development that will benefit the Doncaster and wider district with economic, environmental and social benefits. It is therefore considered that the development is suitable. Green Belt 17.12. The housing needs of Doncaster are putting severe pressure on the local authority to review the Green Belt. To meet the housing requirement Doncaster Council recognises that some Green Belt land will need to be released for new housing land. 17.13. Alverley Lane, Balby demonstrably fails to perform any of the five Green Belt functions set out in the Framework and is therefore currently subject to an unjustified and out of date Green Belt status. This therefore provides an opportunity for a logical and justified release from the Green Belt which will not only offer a highly a sustainable site for housing delivery to meet identified need but also enforce a defensible and more permanent Green Belt boundary for the future beyond the Plan period. 17.14. In the Borough of Doncaster approximately 46% of the area is designated as Green Belt. This is the western part of the Borough which forms part of the South Yorkshire Green Belt surrounding urban areas. 17.15. The Framework considers that Green Belt boundaries can change "in exceptional circumstances" as part of a Local Plan review. Such a circumstance exists through the significant need to provide housing in Doncaster. To meet the housing need and economic growth aspirations the Council has stated it will need to revise the Green Belt boundaries for the emerging Local Plan and beyond to provide the new boundaries with some permanence. 17.16. The site does not currently perform any of the five Green Belt functions as identified within Paragraph 134 of the Framework: 1. To check the unrestricted sprawl of large built-up areas 17.17. Due to the Site’s specific context it does not in itself perform the objective of checking unrestricted sprawl. The southern boundary of the site is in the form of a continuous raised railway line with established tree belt which is significant in mass and scale and forms an impenetrable physical boundary to development of the urban area. It is therefore this feature that fulfils the objective for checking unrestricted sprawl and by default removes the onus of this function from the site itself. 2. To prevent neighbouring towns merging into one another: 17.18. There is a 2 kilometre distance between Balby and the next nearest village to the south and as such the site is not performing as a prevention of two towns merging into one another. As part of the recent Green Belt review the Council has stated "given the strength of the proposed boundary" (the railway line to the south) the site has no role in preventing neighbouring towns from merging. 3. To assist in safeguarding the countryside from encroachment: 17.19. The site is greenfield but is not considered ‘countryside’. The site is an agricultural field nestled in between suburban housing and a railway line forming a significant physical barrier distinctly separating the site both physically and visually from the countryside to the south. The development of this site could not therefore be considered an encroachment into the countryside or affect the openness of the Green Belt. 4. To preserve the setting and special character of historic towns: 17.20. Balby is not classified as a historic town nor acknowledged as having a special character or setting typically associated with a historic town and so the site does not therefore perform this function. 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. 17.21. The site is located by the Council’s own definition as being in the Main Urban Area which is intended to accommodate the majority of the Borough’s development. The site is considered to form part of the ‘urban land’ considered in the context of the currently adopted Local Plan. The sites inclusion in the Green Belt actually restricts the availability of suitable urban land such as this site to deliver housing in turn putting more pressure on sites located in the countryside. There has to be a balance between green and brown field urban land owing to the deliverability issues often experienced on brownfield / redevelopment sites. 17.22. It is therefore concluded that the Site does not currently perform any of the five Green Belt functions and is therefore considered a justified release to deliver much needed private and affordable housing. 17.23. Not only is the site considered to be a justified release from the Green Belt but in doing so will have a strengthening
effect on the Green Belt boundary ensuring its permanence and defensibility into the future beyond the plan period. The Council has recently concluded that the existing boundary is considered to be irregular and inconsistent with the existing built form and that if the site were to be allocated then: 17.24. "The newly formed defined boundary would be a densely vegetated dismantled railway corridor to the south of the site and is considered to be strongly defined, recognisable and likely to be permanent. The resultant Green Belt boundary would result in a rounding of the existing built form and concluded as being a strong and defensible boundary". 17.25. Alverley Lane, Balby is a site which can demonstrate failure to perform all of the five Green Belt functions and as such is a justified release from greenbelt that will provide both an excellent opportunity to meet housing need but also strengthen the Green Belt boundary into the future Achievable 17.26. A range of technical work has been undertaken and further survey work is ongoing. From the initial assessments there are no technical issues that would prevent development or are insurmountable. The site is therefore considered to be achievable and therefore deliverable in accordance with national guidance. The technical assessments are summarised within the accompanying Advocacy Report and are available and can be submitted upon request. 17.27. The indicative masterplan shows how a mix of housing can be accommodated within the site, alongside connectivity, landscaping and drainage features. The site has interest from Persimmon Homes and Ongo Homes (Registered Provider). Efficient Use of Land 17.28. Although the site is greenfield, the proposed scheme will utilise and enhance existing infrastructure. Although the site is not previously developed it is currently under-utilised. The site is easily accessible and the proposed main access is off Alverley Lane. The scheme is therefore making an efficient and effective use of land and infrastructure. Delivering a Flexible Supply of Housing 17.29. The Framework requires Local Planning Authorities to meet their full objectively assessed housing need. Metroland considers that the site at Alverley Lane, Balby is deliverable in the short term and will reinforce the housing supply and address the Borough's housing needs in the early periods of the Local Plan. The site is fully capable of being delivered in the next 5 years and there is interest from housebuilders for the site. A Positive Response to the Key Objectives of the Framework 17.30. Framework sets out that the Governments key housing policy goal of boosting significantly the supply of housing and proactively driving and supporting sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs. The Framework explains that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as extensions to towns, and creating mixed and sustainable communities with good access to jobs, key services and infrastructure. Sites should also make effective use of land and existing infrastructure. 17.31. In relation to the Framework: - The proposal responds positively towards national guidance. - The site is appropriate for accommodating housing growth, being an expansion of an existing settlement. - The proposed site is accessible to existing local community facilities, infrastructure and services, including public transport. - The site has been assessed and is available, suitable and achievable for development. Benefits 17.32. The development of the site would provide significant benefits. The site would provide housing that would meet the needs of the Doncaster housing market. Therefore this site provides a unique opportunity in a sustainable location and without compromising the Green Belt function and purpose. 17.33. In accordance with the Framework this representation has shown that: - The site is suitable for housing and can deliver circa 220 new homes. - The proposal will deliver high quality housing. - The proposal will deliver affordable housing. - The proposal can provide a good mix of housing commensurate to the demand and need in the area. - The scheme uses land efficiently and effectively. - The proposal is in line with planning for housing objectives. - The site is within a sustainable location situated in close proximity to facilities and services and also to bus stops for local bus routes. - The proposal will deliver public open space. - The scheme represents an opportunity to achieve gains for biodiversity through environmental and ecological enhancement. - The scheme will create direct and indirect job opportunities both during and after construction. 17.34. The proposal is an appropriate site to provide for the housing needs of Doncaster in the short term. The allocation of the site would confirm its potential to help continue the provision of a balanced housing supply in the Borough in sustainable locations. The site can deliver a full range and mix of housing and a sustainable community. Development of the site would deliver housing and affordable housing. Doncaster needs to have a robust housing trajectory and the site at Alverley Lane, Balby would assist with this delivery in the short term. The site is situated within a prime location suitable for residential development and as such would facilitate the development of land in a more effective and efficient manner. Development of the site would not harm or undermine the areas wider policy objectives, but seeks to reinforce the need to develop sites within sustainable locations as a priority. 17.35. The proposed allocation policy should therefore be flexible to reflect this evidence base and ensure delivery of the scheme. The site is available, suitable and achievable and therefore deliverable in accordance with the Framework.

Summary:
Support Policy 6 and the allocation of Site 115. The site is suitable and could help provide for housing need in the borough. It can deliver a range of housing and a sustainable community. Can deliver in the short term to aid a robust trajectory. Concerned about some of the site specific requirements in the developer requirements, including the requirement to set development back from the southern boundary - which is unspecific and could harm the yield. It is not clear how the density has been calculated - it is lower than the gross o net assumptions in viability testing. Uncertainty means there may be a requirement to undertake further testing. Also concerned that the site is in a medium - high value area, whereas it was previously low value. There is now a 23% affordable housing requirement. This does not reflect the sales values expected on this site. Policy requirements and the value areas could undermine delivery and increase the need for viability assessments and negotiations. The baseline requirements should be considered holistically to ensure they are workable. Currently unsound and could fail to deliver sustainable development in line with the framework. Needs increased clarity and further viability work, site capacity work and reviewed developer requirements.

Response:
Support for allocation of the site is welcomed. The developer requirements are considered justified and set out some key principles to help guide successful planning applications in due course. See response to Policy 8 in respect to the viability testing evidence base.
This Local Plan Representation has been prepared by DLP Planning Ltd on behalf of Avant Homes in response to the publication of the Doncaster Local Plan (Regulation 19) for consultation. This representation relates to the 'Former Wheatley Hills Middle School, Leger Way' (site ref: 432 & 391). This representation should be read alongside the formal response form that has also been completed and submitted in relation to the site.

**Site and Context**
The site comprises of land at the Former Wheatley Hill School, to the east of Leger Way, Doncaster and is approximately 5.4 ha in size. The site was formerly occupied by the Wheatley Hills Middle School, which closed in 1997 and has since been demolished, the remaining portion of the site was formerly used as school playing fields. The site is bound by Leger Way to the west, Wheatley Golf Course to the south and east, and business and industrial units surrounding Shaw Wood Way to the north / north west of the site. The site is flat, and is located within Flood Zone 1. The site is currently subject to a live full planning application for the development of 143 dwellings, this application is currently under consideration and due to be determined shortly.

**Proposed allocation**
The site is proposed to be allocated for housing under site reference 432 and 391 'Former Wheatley Hills Middle School, Leger Way'. Policy 6 'Housing allocations' sets out that Housing Allocations will help to deliver the Spatial Strategy, meet the needs for housing and support sustainable communities the Council have suggested an indicative capacity of 134 houses for this proposed allocation. The allocation of this site under policy 6 of the Publication Local Plan is supported, and the delivery of this site for housing is considered to be essential to delivering the spatial strategy for the Borough. Policy 3 'Level and Distribution of Growth', sets out that the Local Plan’s strategic aim is to facilitate the delivery of 18,400 homes in the period of 2015 - 2035 (920 annum), with sufficient land allocated to deliver 15 years’ supply of housing. To meet the Local Plan’s Spatial Strategy and Settlement Hierarchy, at least 50% of the Borough’s Total Housing will be located within the Doncaster Main Urban Area, which equates to at least 6,805 - 7,315 dwellings. The site is proposed to be located within the development boundary for Doncaster and is therefore included within the Doncaster Main Urban Area, this approach is supported. However, the site is identified in Table H2 (a) of the Local Plan to be able to accommodate at least 134 dwellings, we object to the indicated capacity of 134 on the grounds that there is an application currently lodged for 143 dwellings with Doncaster MBC. It is requested that this figure in Table H2 (a) is amended to accord with the proposed number of units and that capacity figures are reviewed elsewhere in the Local Plan area. The allocation of this site for housing meets the objective of paragraph 117 of the NPPF, which sets out that strategic policies should make use of previously developed land as much as possible.

**Summary**
An application for residential development on the site is currently under consideration by Doncaster MBC and pending decision. The site is proposed to be allocated for residential development under reference 432 & 981, with an indicative capacity for 134 dwellings. The delivery of this site will make the efficient use of previously developed land which is located within the Doncaster Main Urban Area and will make a notable contribution to housing supply in the Borough thereby supporting the spatial strategy for the plan period. The allocation of this site for residential development and this principle is supported, however, we object to the suggestion that the site can deliver 134 dwellings over the plan period and request that the indicative figure is increased to 143 units.

**Response**
The difference between the allocation capacity (137 units) and the pending planning application (143 units - 19/01170/FULM) is just 6 dwellings. The planning application was submitted in May 2019 after the Local Plan had commenced through the DMBC internal approvals process for decision to publish under Regulation 19. Policy 6 makes clear that capacities are indicative and that higher density schemes will be supported, for example where they lead to a more appropriate design solution.
We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Area: Chapter 16: Spatial Proposals

Policy: Doncaster Main Urban Area

Tests of Soundness:

Comment:

This site represents a sustainable, deliverable site which accords with the strategic aspirations of the plan. A Site Delivery Document (SDD) was previously submitted to the Council which outlines how the site contributes to achieving the three over-arching objectives of sustainability as set out at paragraph 8 of the Framework. The SDD has been re-submitted as part of these representations for consideration. (SEE EMAIL FOR Document) This site meets the three tests required to be considered a deliverable site. It is in the control of Persimmon Homes, the UK’s largest house builder and is immediately available and achievable for residential development. The site is suitable for development with no insurmountable technical constraints present. A section of the site is covered by Flood Zone 3. The implications and response to this are outlined in detail below. Site and Location For context, the site comprises two parcels of agricultural land extending to an area of 24.5 ha. The site has the capacity to accommodate at least 300 homes with the potential for over 400. It is located adjacent to existing residential areas on the edge of Kirk Sandall. Kirk Sandall is a sustainable settlement benefiting from excellent public transport links including regular train and bus services. It is well connected to the road network. Armthorpe Lane forms the eastern boundary of the site. Brecks Lane intersects the site (approximately two thirds of the way down) and provides a suitable access point to both parcels. There are numerous opportunities to provide pedestrian and cycle connections into Kirk Sandall from the western boundary of the site. A more detailed appraisal of the site is included in the SDD. Being located on the east side of the settlement of Kirk Sandall within the Doncaster Urban Area, the area of the Borough identified as being the most sustainable location for growth and the location that is intended to accommodate the highest number of houses in the plan period. It is well served by the shops and services (including schools, medical surgeries and bus and rail links) within Kirk Sandall itself. The Council's reason for exclusion This site is identified in the HELAA and has been assessed against the Council’s selection methodology but was rejected on the basis that the site fails to meet the flood risk sequential test. However, this assessment was a high level assessment which automatically ruled the site out because part of the site was located in Flood Zone 3. The assessment failed to consider if the sequential test could be met within the site and still provide a deliverable site which could meet all other policy objectives. By applying a blunt assessment methodology, the site has been discounted without further consideration of the wider sustainability credentials of the site. The sequential test can be met within the site. Flood Zone 3 covers parts of the northern section of the site and this area of the site is not proposed for residential development. A comprehensive masterplan has been developed for the site, which shows this area as public open space. This area provides opportunities for the incorporation of sustainable urban drainage systems (SUDS). It also allows for sufficient space to provide a buffer between Kirk Sandall and the nearby settlement of Barnby Dun, therefore avoiding coalescence of the two settlements. The appended SDD demonstrates how this could be accommodated without prejudicing a sustainable, comprehensive development being brought. National Designations As set out in the HELAA assessment, part of the site is located within Flood Zone 3 and is considered to fail the sequential test. The Framework requires; “All plans should apply a sequential, risk-based approach to the location of development - taking into account the current and future impacts of climate change - so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by: a) applying the sequential test and then, if necessary, the exception test as set out below; b) safeguarding land from development that is required, or likely to be required, for current or future flood management; c) using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.” This process is augmented by advice within PPG which rightly promotes development in Flood Zone 1 as being sequentially preferable following the cascades set out in diagram 2. Neither the Framework nor PPG expressly prohibit the allocation of any site where any part of a site is within Flood Zone 3. The site at Kirk Sandall meets the sequential test as development would take place within the 75% of the site which falls within flood zone 1, it would be avoided within the 25% of the site which falls within flood zone 3. It is also worth noting that almost all of the other sites that have been rejected on this basis have a much larger proportion of their area in Flood Zone 3 or have other technical or policy constraints affecting their suitability (such as Green Belt). Armthorpe Lane has no such issues. The site selection process has failed to account for the fact that the vast majority of the land at Armthorpe Lane is located within Flood Zone 1 and that to exclude the small element of Flood Zone 3 on the site from accommodating residential (or any other inappropriate development) remains in accordance with both national policy and the strategic objective of the draft Local Plan. Local Designations The site is defined within the Local Plan policies map as being countryside due to it being beyond the defined development limit. It is in Persimmon Homes' opinion illogical for the boundary of the settlement to be drawn in this location. It is considered that Armthorpe Lane (forming the eastern boundary of the site) forms a more logical and permanent fixed boundary that will safeguard the countryside from encroachment. It is illogical for the site to be classified as countryside simply because it is outside a set boundary. The site adjoins the Doncaster Main Urban Area which is, by definition, the most urbanised part of the Borough, it should not therefore be classified as countryside and should be allocated within the Local Plan. The nearest settlement to which it could coalesce is Barnby Dun to the north, although the area of Flood Zone 3 is located in the northern portion of the site and would remain open in any event and providing a more definitive, established permanent open space buffer preventing coalescence. The site is farmed so doesn't...
provide any opportunities for outdoor sport and recreation (although informal amenity facilities could be provided as part of a development scheme) and non-renewable resources and rural communities would not be affected. Moreover, the allocation of this site would assist in directing development towards urban areas. Technical Matters An assessment of all of the key technical matters is included within the SDD and underpinned by up to date and site specific assessments. Matters of flood risk aside, there are no technical issues that prevent the site’s allocation. The site benefits from a number of potential access points without the need for new junctions to be introduced on the Armthorpe Lane itself with the opportunity for secondary pedestrian connections through to the existing properties to the west, allowing additional development to tie in coherently with the existing settlement. There are no areas of ecological sensitivity, is not contaminated and can be suitably drained. There are two large electricity lines running north-south through the site and these can either be accommodated within the design (as shown on our masterplan within the SDD) or relocated underground. Conclusions This site is sustainably located in the part of the Borough that the plan envisages will accommodate the highest level of growth. It is constrained only by a Flood Zone that is located on a portion of the site that is not necessary for sustainable development of the site and even creates an opportunity for more structured open space to prevent coalescence with Barnby Dun. The site is owned outright by Persimmon Homes and as such it is available and deliverable immediately. Further, it is noted that a number of the proposed allocations include sites that are less sustainably located, accommodating more significant flooding issues (such as in Barnby Dun) and have a track record of failed delivery (such as with the former Bombardier site in Hexthorpe). It is difficult to conclude how, in light of the above, how such locations can be considered more sustainable and deliverable than the site proposed here. In light of the above, it is respectfully requested that the site is allocated.

Summary:

Site 116 represents a sustainable, deliverable site which accords with the strategic aspirations of the plan. A Site Delivery Document (SDD) was previously submitted to the Council and has been re-submitted as part of these representations for consideration. This site is in the control of Persimmon Homes, is suitable for development with no insurmountable technical constraints present. A section of the site is covered by Flood Zone 3. Being located on the east side of the settlement of Kirk Sandall within the Doncaster Urban Area, the area of the Borough identified as being the most sustainable location for growth and the location that is intended to accommodate the highest number of houses in the plan period. It is well served by the shops and services (including schools, medical surgeries and bus and rail links) within Kirk Sandall itself. This site is identified in the HELAA and has been assessed against the Council’s selection methodology but was rejected on the basis that the site fails to meet the flood risk sequential test. However, this assessment was a high level assessment which automatically ruled the site out because part of the site was located in Flood Zone 3. The assessment failed to consider if the sequential test could be met within the site and still provide a deliverable site which could meet all other policy objectives. By applying a blunt assessment methodology, the site has been discounted without further consideration of the wider sustainability credentials of the site. The sequential test can be met within the site as development would take place within the 75% of the site which falls within flood zone 1. It is also worth noting that almost all of the other sites that have been rejected on this basis have a much larger proportion of their area in Flood Zone 3 or have other technical or policy constraints affecting their suitability (such as Green Belt). Armthorpe Lane has no such issues. The site is defined within the Local Plan policies map as being countryside due to it being beyond the defined development limit. It is in Persimmon Home’s opinion illogical for the boundary of the settlement to be drawn in this location. It is considered that Armthorpe Lane (forming the eastern boundary of the site) forms a more logical and permanent fixed boundary that will safeguard the countryside from encroachment. Matters of flood risk aside, there are no technical issues that prevent the site’s allocation. It is noted that a number of the proposed allocations include sites that are less sustainably located, accommodating more significant flooding issues (such as in Barnby Dun) and have a track record of failed delivery (such as with the former Bombardier site in Hexthorpe). It is difficult to conclude how, in light of the above, how such locations can be considered more sustainable and deliverable than the site proposed here.

Response:

It is noted that the flood risk issue has been negated by a submitted masterplan avoiding land in the flood zone. There are however very large overhead pylons that cross the site north to south. The masterplan avoids development beneath them with buffering/open space/landscaping. These constraints significantly reduce the potential capacity of the site from the estimated average of 646 dwellings. The Council still has concerns in respect to accessibility issues with taking access from Brecks Lane. No footways presently and Brecks plantation will constrain provision in the form of offsite highway works. Therefore does not necessarily conform with NPPF 108/110. Unable to determine whether visibility requirements for new accesses would meet requirements in accordance with 85th percentile wet weather speeds.
We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Persimmon Homes supports the proposed allocation of the land to the east of Warning Tongue Lane. The site is available, suitable and achievable for development. It is under the control of Persimmon Homes and situated in a popular market area. The Site is demonstrably suitable for residential development. There are no technical constraints which would prevent develop of the site which cannot be satisfactorily mitigated. The Site is located entirely in Flood Zone 1 and the vast majority of the site is identified as being at very low risk of flooding from surface water. There are no known infrastructure capacity issues which would preclude the development of the site and which cannot be satisfactorily addressed. The Site is located in a sustainable location directly adjacent to existing residential areas and located close to a wide-range of local services and amenities. As a site which is available, suitable and achievable, the site therefore meets the test in the NPPF to be considered a deliverable site which can be brought forward for development in the short-term. In order to provide a sufficient buffer of sites and reflect the comments regarding the scale of housing need above, the Council will need to identify additional sites which are available, suitable and achievable for residential development. Persimmon Homes is in control of two sites which both satisfy all three tests. These are located at Armthorpe Lane, Kirk Sandall and at Cemetery Road, Hatfield Woodhouse. The merits of both sites are described and it is respectfully requested that both sites are allocated. Site 116: Armthorpe Lane, Kirk Sandall The site is sustainably located in the part of the Borough that the plan envisages will accommodate the highest level of growth. It is constrained only by a Flood Zone that is located in a portion of the site that is not necessary for the sustainable development of the site and even creates an opportunity for more structured open space to prevent coalescence with Barnby Dun. The site is owned by Persimmon Homes and as such it is available and deliverable immediately. Further, it is noted that a number of the proposed allocations include sites that are less sustainably located, accommodating more significant flooding issues (such as Bawtry Dun) and have a track record of failed delivery (such as Bombardier site in Hexthorpe). It is difficult to conclude how, in light of the above, how such locations can be considered more sustainable and deliverable than the site proposed here. Site 119: Cemetery Road, Hatfield Woodhouse This site represents a deliverable site because it is available, suitable and achievable for development. However, it has been excluded as an allocation due to the positioning of Hatfield Woodhouse in the settlement hierarchy. The settlement hierarchy identifies Hatfield Woodhouse as a Defined Village. Hatfield Woodhouse is located less than a kilometre from the centre of Hatfield which is judged to be a sustainable location for growth. Within the settlement profile evidence document the Council concludes that Hatfield Woodhouse is closely related to the settlements of ‘Dunsrot, Dunsville, Hatfield and Stainforth’ and ‘Thorne and Moorends’ both of which have an excellent provision of services that can be easily accessed. These areas are identified as main towns and are expected to accommodate around 40% of new housing growth. As Hatfield Woodhouse is closely related to the settlements it would provide an excellent location for additional land to be allocated within a sustainable location to support the strategy of growth across the Borough. The site is located in Flood Zone 1 and is identified as being at very low risk of flooding from surface water sources. Furthermore, there are no known technical constraints which would prevent the development of the site.

Persimmon Homes supports the proposed allocation of the land (Sites 164/430) to the east of Warning Tongue Lane. The site is available, suitable and achievable for development. It is under the control of Persimmon Homes and situated in a popular market area. The Site is demonstrably suitable for residential development. There are no technical constraints which would prevent develop of the site which cannot be satisfactorily mitigated. The Site is located entirely in Flood Zone 1 and the vast majority of the site is identified as being at very low risk of flooding from surface water. There are no known infrastructure capacity issues which would preclude the development of the site and which cannot be satisfactorily addressed. The Site is located in a sustainable location directly adjacent to existing residential areas and located close to a wide-range of local services and amenities. As a site which is available, suitable and achievable, the site therefore meets the test in the NPPF to be considered a deliverable site which can be brought forward for development in the short-term. In order to provide a sufficient buffer of sites and reflect the comments regarding the scale of housing need above, the Council will need to identify additional sites which are available, suitable and achievable for residential development. Persimmon Homes is in control of two sites which both satisfy all three tests. These are located at Armthorpe Lane, Kirk Sandall and at Cemetery Road, Hatfield Woodhouse. The merits of both sites are described in submitted evidence and it is requested that both sites are allocated.

Support noted
It is very clear the draft Plan has been prepared with close attention to and consistent with the NPPF. It does not repeat NPPF policy unnecessarily and provides flexibility throughout the Plan period particularly in relation to housing and employment policies and commits to reviews at least every 5 years. The Plan carefully balances locally-generated housing needs, the development requirements flowing from the Council’s economic growth aspirations and the consequential additional housing requirements with landscape, environmental and other technical considerations. It would be a pleasure to support the Plan at Examination: not something I recall ever having said previously in connection with the many Local Plans with which I have been associated.

These representations are to be read in conjunction with separate representations which support the approach to the housing requirement in the draft Local Plan, the Plan’s aims, housing distribution policies and definition of the Doncaster Main Urban Area. The representations support the allocation of Site 033: Land adjacent to 163, Sheffield Road, Warmsworth for residential development. The land is owned by a small family company and has been held by them for the purpose of eventual residential development. It is therefore available and if considered appropriate could be developed (i.e. delivered) in years 1-5 of the Local Plan rather than in years 6-10 as currently anticipated in the Plan. The Site Assessment (draft Plan page 260) identifies 7 material planning considerations, which development of the site will need to address, to which we respond as follows: Archaeology The landowner is aware of the local significance of the tunnel which is accessed from within the allocated site (see attached photograph A) and appreciates the tunnel may be considered to be a non-designated Heritage Asset. The tunnel was constructed between 1872 and 1892 to supply water from the Thrybergh Reservoir to Edlington and Warmsworth. It is some 1.2km in length, constructed in brick and rock with four air shafts. The shafts lie outside the allocated housing site, to the south west. Photograph B shows the entrance to the tunnel, photograph C is taken within the tunnel although the precise location of the photograph is not known and photograph D looks up one of the off-site air shafts. The site owner appreciates the significance of the tunnel will need to be further considered as part of any planning application for the development of the site. The owner is content for the tunnel entrance to be retained and incorporated within the development if further assessment concludes that the asset is of sufficient significance to justify this. Biodiversity The protection and where necessary extension of tree and other biodiversity habitats can be incorporated in any detailed layout as part of the normal planning process. The areas identified in the Site Assessment run along the site boundaries and retaining these features would not affect the viability of the development. Design The design requirements set out in the Site Assessment, again, can readily be incorporated in any site layout. Education It is assumed the need for a contribution towards education will be reassessed at the time any planning application is submitted as the need for such contributions can vary significantly over relatively short timescales. If a contribution is needed, the requirement will be met as part of the development management process. Public open space Open space to meet Local Plan requirements can be incorporated within any site layout. Transport The Site Assessment offers options for access to the site but does not suggest this is likely to prove a constraint to development and preliminary advice from Highway Consultants confirms this to be the case. A Transport Assessment and Travel Plan will be submitted as part of any planning application and would be expected to incorporate vehicle routing proposals during construction, if considered necessary. Trees and hedgerows The Site Assessment here largely repeats comments made under Biodiversity (above). Again, these requirements will be taken into account in any detailed layout plans for the site. In conclusion, the site is available for development and no constraints to development have been identified which would affect its viability or delivery within the Plan period. (SEE EMAIL FOR Photographs)
Tests of Soundness:

Justified

Comment:

However, Table H1(A) suggests that the site will deliver 930 sites over the plan period. The current live planning application for the site proposes a maximum of 671 dwellings and therefore we object to the proposed yield for the site which should be amended to accord with the proposed scheme. The remaining 259 units should then be allocated elsewhere in the Borough.

Summary:

The capacity stated is 930, but this is projected to deliver 671 units - the remaining 259 should be allocated elsewhere in the borough.

Response:

The capacity will be amended accordingly.
The remaining part of the site, to the west of the housing allocation, is proposed to be retained within the Green Belt. The development proposals currently subject to determination proposes this land as undeveloped Green Space, therefore the proposed Green Belt allocation is supported.

**Summary:**
- Support Western part of site remaining as Greenbelt on the proposals map.

**Response:**
Support for the western area to remain washed over with Green Belt is welcomed.
Policy 6 'Housing allocations' sets out that Housing Allocations will help to deliver the Spatial Strategy, meet the needs for housing and support sustainable communities. The site is allocated under site reference 838 'Kirk Street/Ramsden Road/Eden Grove' for residential use. The allocation of the site is supported, and the delivery of this site for housing is considered to be essential to delivering the spatial strategy for the Borough.

Summary:
Policy 6 'Housing allocations' Supportive of allocation of site 838 and contribution towards objectives of the Policy.

Response:
Support welcome
This Local Plan Representation has been prepared by DLP Planning Ltd on behalf of Countryside Properties plc in response to the publication of the Doncaster Local Plan (Regulation 19) for consultation. This representation relates to ‘Kirk Street/Ramsden Road/Eden Grove, Hexthorpe’ (site ref: 838). This representation should be read alongside the formal response form that has also been completed and submitted in relation to the site. Site and Context The application site comprises approximately 32 hectares of previously developed land comprising the former Bombardier Rail Works (now demolished). The site is located on the edge of Doncaster town centre within the Hexthorpe area. The site is relatively flat and due to the presence of the River Don to the north of the site, there are parts of the site located within Flood Zones 2 and 3. The site is bound by industrial uses to the east, residential development to the south and allotments to the west. (SEE EMAIL FOR Fig. 1: Aerial view of the site) The site has two extant planning permissions for residential development, which demonstrates that the site is a suitable location for residential development. A full planning application for 671 dwellings and associated infrastructure has recently been and has been subject to pre-application discussion with the Local Planning Authority. Countryside have recently acquired the site and subject to the granting of planning permission intend to commence development of the site in early 2020. Proposed allocation The site is currently proposed for a number of allocations, as per the Publication Local Plan Policies Map Extract in Fig.2. The eastern portion of the site is identified as an ‘Housing Allocation with Permission’ and the western portion of the site is identified as ‘Green Belt’. (SEE EMAIL FOR Fig.2: Doncaster Publication Local Plan Policies Map Extract)  

Summary:

Re site 838 Hexthorpe (former Bombardier site)  o Allocated site - residential o Supportive of allocation.

Response:

Support welcomed
The site is proposed to be allocated for residential development under site reference number: 838, and benefits from an extant planning permission for housing use. The delivery of this site will make best use of a previously developed site, which is situated in a highly sustainable location. The site has the capacity to make a significant contribution to the supply of housing in the Borough and is essential in meeting the spatial strategy for the plan period. The allocation of this site for residential development is supported, however, we object to suggestion that this site will deliver 930 dwellings and request that this figure is amended.

Summary:
The site is proposed to be allocated for residential development under site reference number: 838, and benefits from an extant planning permission for housing use. The delivery of this site will make best use of a previously developed site, which is situated in a highly sustainable location. The site has the capacity to make a significant contribution to the supply of housing in the Borough and is essential in meeting the spatial strategy for the plan period. The allocation of this site for residential development is supported, however, we object to suggestion that this site will deliver 930 dwellings and request that this figure is amended.

Response:
Support for the site is welcome. The capacity will be amended to reflect more up to date housing number assumptions.
Harron Homes have an interest in land to the north east of Rose Hill Rise, Bessacarr with the intention of bringing this forward for residential development. The Site lies within the urban area of Doncaster and is allocated for residential development within the adopted Unitary Development Plan, 1995 under saved policy PH1/UDP Area 2. (SEE EMAIL FOR UDP MAP EXTRACT) Site PH1(2/12), extends to 6.79ha of land off Rosehill Rise, Bessacarr and is allocated for 170 units. No development has taken place on this Site to date, but it is now being actively taken forward through pre-application discussions with the Local Planning Authority. Within the emerging Doncaster Local Plan 2015-2035 Publication Version, Policy 2 sets out the Spatial Strategy and Settlement Hierarchy with a focus on delivering sustainable growth appropriate to the size of individual settlements. At least 50% of new homes will be developed within the Main Urban Area of Doncaster. Policy 3 sets out the level of growth (18,400 homes in the period 2015 - 2035) and distribution with at least 50% of the Borough’s total housing requirements being focussed on Doncaster’s Main Urban Area. Policy 6, Housing Allocations is the strategic policy which seeks to deliver the housing requirement and distribution set out in Policy 3. Chapter 16 of the emerging Local Plan sets out the Plan’s Spatial Proposals. The Doncaster Main Urban Area (MUA) is defined as the contiguous built-up area of Doncaster comprising the town centre and distinct but connected districts including Cantley and Bessacarr and the Plan’s aim is to strengthen the area’s role in providing services for the whole Borough and beyond. The MUA is to remain the main focus for development in the Borough (Policy 2) and specifically, the main location for housing growth with at least 50% of the Borough total to be allocated in this area (paragraph 16.20 / Policy 3). Further details of sites for residential development are set out in accompanying tables. 6.71ha of land at Rose Hill / The Avenue is confirmed as an allocation for residential development within Table H2(A) (allocations without planning permission) (Site ref: 350/407 with an Indicative capacity of 166 dwellings. Anticipated delivery is set out as 70 units in Years 0-5 (2015 - 2020) and 96 units in years 6-10 (2020-2025). (SEE EMAIL FOR PLAN) Support is therefore given for the continued allocation of land off Rose Hill Rise/The Avenue which falls within the Main Urban Area of Doncaster and as such will make a valuable contribution towards the Borough’s housing requirement in this very sustainable location.

Summary:
Re sites 350 and 407 Rose Hill Cantley (allocated sites). o Support the allocation of the site. o Can contribute to objectives of Policy 6.

Response:
Support welcomed
The Housing Allocations policy sets out the various allocations by settlement. Whilst HLM/HBD do not pursue an objection to individual sites, it submits that further sites will be required based on our suggested increase in the housing requirement and potentially to maintain a five year supply of housing. In addition HLM/HBD raise an objection against the approach to identifying reserve sites. Table 5 at P44 sets out the Summary of Housing Requirement and Supply Position and identifies a ‘Reserved Sites Potential Capacity’ of 1483 dwellings. However, whether these sites are ‘deliverable’ or even ‘developable’ seems highly dubious based on the explanation at paragraph 4.82: "Reserve Development Sites have a capacity of 1,483 dwellings. This capacity is additional to the allocations capacity. These are sites where there is currently doubt about whether they could be developed in the plan period, due to HS2 Safeguarding Route, and/or where allocation cannot be justified in accordance with a sequential approach to addressing flood risk. The sites are however otherwise sustainably located within urban areas and development for housing (or mixed-use including housing) would be appropriate if flood risk and other issues can be overcome. New applications will be approved where flood risk sequential and exceptions tests and/or other development requirements can be satisfactorily addressed. Any completions on these sites will contribute to meeting the plan period housing requirement but have not been factored into housing supply.” The Green Belt Topic Paper at paragraph 3.3.40 further states: “The Local Plan also includes a number of ‘Reserve Development Sites’ which are sites that currently face constraints which mean they are unsuitable for allocation. This is generally as they fall within areas of risk of flooding.” It seems no significant weight can be attributed to these sites as ‘reserve sites’ as there is considerable doubt over their suitability. They should not therefore be counted as part of the overall supply or relied upon as a buffer. PROPOSED CHANGE We have identified that the Plan is failing to provide sufficient housing to meet a job led requirement for the whole of the Plan period. HLM/HBD is promoting land that can assist with meeting this shortfall. Parcels P5 and P6 on the enclosed capacity plan could provide circa 650 dwellings and 130 dwellings respectively. Within the Council’s evidence documents these are identified as sites 513 and 512. Parcel P5 (S13) This site is within the Green Belt. We understand it was formerly a proposed allocation in the Site Allocations Development Plan Document that was submitted for examination in 2014 and would have accompanied the Core Strategy prior to its withdrawal and a decision being made to undertake a new plan. The Green Belt Topic Paper identifies this site as having a ‘moderately strong case’ for inclusion in further site selection work and the Green Belt Review (P3, Appendix 1) states in respect of boundaries "The Proposed Green Belt boundary would be defined by Red House Lane in the north and east, and the extent of the Great North Road in the east. The Resultant Green Belt boundary would therefore result in a strongly defined feature which would represent a natural rounding off to north of Adwick le Street to mirror the extent of built form to the west of the Great North Road.” Indeed the site performs strongly against sites selected for development in the Green Belt, including Site No.33 - 163 Sheffield Road, Warmsworth (112 dwellings), Site No. 165/186 - Land N. of A1/ Land off Crabgate Lane, Skellow (300 dwellings), Site No. 929 - Land North of Cadby Rd, Sprotbrough (80 dwellings). The principal reason why the site has not been selected is that the lower range of the housing requirement for Adwick and Woodlands could be comfortably reached without intrusion into the Green Belt. At present the housing requirement range for Adwick and Woodlands is 255-765, with the ‘planned’ total (ie: allocations and permissions) standing at 482 dwellings. However, we have identified that a significant increase in overall housing number requirement is necessary and further that the methodology between the distribution between main towns appears to have undertaken on a household number basis, rather than a reflection of the sustainability credentials of each settlement. An increase in the overall level of housing and a re-distribution of housing across main town settlements, will potentially alter this position and in this context site S13 is well positioned to contribute positively to an increased housing provision for the Plan period. Even in a context where additional housing land was necessary in Adwick & Woodlands to help meet the overall housing requirement figure or as part of revised Adwick & Woodlands distribution, but 650 dwellings was not required to meet the minimum thresholds, the remaining land could assist the Council in providing a suitable buffer. We have previously identified that the ‘reserve’ sites appear to have significant constraints and can’t be relied upon as part of any flexibility within the Plan, and a greater buffer of ‘over-allocation’ would provide a robust position for the delivery of the Borough’s housing requirement. It is noted that the site selection work has identified that the site has archaeological constraints. Should the examination of the Plan find it unsound and further housing land is required as suggested above, HLM/HBD will submit archaeological evidence to demonstrate the suitability of the site. Parcel P6 (S12) This site has a clear and obvious relationship with parcels P4 and P5. As with Parcel P4 the site is identified as having a ‘moderately weak case’ for further site selection work but again this is an assessment in isolation, and when considered in the wider context of P4 and P5, the removal of this land from the Green Belt would result in a stronger boundary. This site was also discounted from selection on the grounds of failing the sequential test. However, as demonstrated by the appended capacity plan this only affects the northern section of this parcel and it would be the intention to limit housing development to areas within flood zone 1. This results in a reduced potential capacity of circa 130 dwellings. The necessity of this site to meet any revised housing requirement would need to be considered on its merits but in the context of a wider allocation for a sustainable urban extension providing residential and employment development, it is a logical addition and would strengthen the future Green Belt boundary. Should a case not be strong for inclusion within this Plan, the site could be identified as safeguarded land to help fulfil the objectives of Paragraph 139 of the NPPF.
No objections to the sites, but contends that more sites will be required based on the suggested increase in the housing requirement and potentially to maintain a 5 year supply of housing. Do object to the approach to identify reserve sites and the identified capacity of 1483 dwellings. It is highly dubious whether these sites are deliverable or developable based on para. 4.82 of the Local Plan and 3.3.40 of the Green Belt Topic Paper. It seems no weight can be given to these reserve sites as there is considerable doubt over their suitability. They should not be counted as part of the overall supply or relied on as a buffer. Proposed change: Have identified that the plan is failing to provide sufficient housing to meet a job led requirement for the whole Local Plan period. Site 512 and 513 could provide 130 and 650 dwellings respectively. Site 513: was previously promoted in the Site Allocation DPD. It has a moderately strong case in the Green Belt Review with strong resultant boundaries. Scores strongly compared to sites 165/186 (Carcroft - Skellow); 033 (MUA) and 929 (Sprotbrough). The principal reason this site has not been selected is because the range is lower and non Green Belt allocations / permissions get within it. However, a significant increase in housing is necessary and the distribution should be different - reflecting settlement sustainability credentials - and therefore the position may be altered and this site is well placed to contribute positively to increased housing provision in the plan period. Even if additional land is necessary but 650 dwellings not needed to meet minimum thresholds, the remaining land could assist in providing a suitable buffer, with an over-allocation to provide a robust position for the housing requirement delivery. Reserve sites cannot be relied on as part of plan flexibility. If archaeological concerns mean the site is found unsound, archaeological evidence can be provided to demonstrate site suitability. Site 512: If not seen in isolation, but as part of wider allocations in and around it (as proposed in this representation), the site would score better in Green Belt terms and can provide a stronger boundary. The site is discounted for failing the sequential test, however housing could be limited to areas in flood zone 1 (capacity of 130 dwellings). The necessity of the site to meet any revised housing requirement would be on its merits, but in the context of a wider allocation for a sustainable urban extension providing residential and employment land, it is a logical addition which would strengthen the future Green Belt boundary. Alternatively, the site could be identified as safeguarded land as per NPPF para. 139.

Response:
As the Green Belt Topic Paper explains, the Green Belt Review is part of the consideration for exceptional circumstances for removing sites from the Green Belt. It is not a case of picking the "next best" site in the overall scores, there are other considerations. Adwick - Woodlands is the smallest of the Main Towns and has a lower housing target, but can comfortably get in its range without utilising Green Belt. No sites are to be safeguarded, and the Reserve Housing Sites do not contribute to any housing totals, rather they are sites which are constrained but would be potentially suitable for housing subject to constraints being overcome.
Chapter 16: Spatial Proposals

Attend Hearing
Main Town - Armthorpe
Savills (UK) Limited
30/09/2019

Savills Assessment
Brownfield site in poor market area. The site has not started construction, instead a process of remediation is currently ongoing. Outline planning was granted in 2001 up until July 2018 a total of 150 dwellings have been built, yet over a similar period of the plan period 3.36. This issue is even more pertinent within the Main Urban Area as some of the constrained sites are large and make a significant contribution to the supply. Two clear examples are the Former McCormick Tractors International site (site ref: 984) which is entirely within Flood Zone 2/3. Here the over reliance on brownfield land has allowed for a very constrained site to come forward to the detriment of DMBC’s housing supply. 3.37. Another site constrained is Manor Farm, Bessacarr (site ref: 843). The site is somewhat constrained by the rail network and as part of the Section 106 agreement requires a crossing over the railway. This issue will have a knock on effect on the viability of the scheme which has possible impacts on the housing supply position. These two sites represent 46% of the Main Urban Area deliverable supply and could easily mean the overall housing supply falls well below its required level. 3.38. Table H1(A) details the number of sites within the Main Urban Area of Doncaster that have planning permission, with 57% having not started (27 sites). Of the sites all but 5 are on previously developed land. It cannot be argued that there should be a preference for brownfield sites over greenfield sites however the delay in sites impacting on supply must also be recognised. Brownfield sites do have a number of constraints as a result of the previous land use, often resulting in remediation and even the requirement of an EIA screening which can add long delays. It may be that more advantageous to include sustainable sites in the countryside as opposed to poor performing brownfield sites. 3.39.

to detail, building at density on PDL sites is only viable insofar as certain capital values can be reached otherwise developers will not build. This is due to certain economic realities and cash flow positions which result in greater challenges when compared with Green Belt or greenfield sites. The current average house price in Doncaster is £163,000 compared with the national average of £300,000 (see Figure 1). With Doncaster a lower value city when compared nationally it is unlikely to be attractive for large scale city/ district centre investment in historic buildings, such as mills, which represent higher build costs and increased technical difficulties. Caution must be made to focusing development on brownfield land as this could undermine the sustainable development aspirations outlined throughout the NPPF. (SEE EMAIL FOR Figure 1: Average house values in Doncaster and UK (Source: Zoopla, 2019))

Tests of Soundness:

 tests surrounding the site selection process and the figures attached to the supply of housing over the plan period. It must be remembered that sites need to be deliverable and developable as defined within the NPPF. DMBC already admit to site constraints, with Policy 6 stating that ‘much of the supply is not without constraints’. This admission proves that the council are fully aware of the issues surrounding their sites and as a result perceived supply over the plan period. 3.36. This site is even more pertinent within the Main Urban Area as some of the constrained sites are large and make a significant contribution to the supply. Two clear examples are the Former McCormick Tractors International site (site ref: 984) which is entirely within Flood Zone 2/3. Here the over reliance on brownfield land has all

to summarise, the below table provides an initial assessment of the housing supply within the MUA. The table takes into account a number of the key concerns Savills have with regards to the large housing allocations within the MUA. The assessment will look to consider site constraints and unjustified high build out rates to provide a more accurate assessment of the housing supply within the MUA. Please note we will be following this initial assessment with a more detailed analysis later in the year. Site information - SHLAA: 938 Site Address: Kirk Street/Ramsden Road (site ref: 838). 3.41. Using Manor Farm as a detailed example the sites overall capacity of 1,106 units was agreed under outline application ref: 14/00124/WCC. As of April 2018 the site has built 141 units over 4 years (since the original application in 2014). In contrast over the first 5 years of the plan the site is expected to build 350 dwellings, 70dpa. By looking at previous trends this seems rather ambitious and provides a dishonest supply of housing over the plan period. Size of Sites 3.42. While we recognise the contribution that small and medium sized sites make to meeting the housing requirement as set out within the NPPF there is an over reliance on a large number of small sites (10 units or below) within the Main Urban Area of Doncaster. Of those with planning permission there are 23 such sites, out of a total of 49 sites. This therefore means that there is a market saturation within the MUA of small sites and with a limited number of smaller housebuilders to be able to build them all during the plan period. This is further clarified by the fact 70% of the small sites with planning permission have still not started building (as of April 2018). Housing Supply Position - Savills Assessment 3.43. To summarise, the below table provides an initial assessment of the housing supply within the MUA. The table takes into account a number of the key concerns Savills have with regards to the large housing allocations within the MUA. The assessment will look to consider site constraints and unjustified high build out rates to provide a more accurate assessment of the housing supply within the MUA. Please note we will be following this initial assessment with a more detailed analysis later in the year. Site information - SHLAA: 938 Site Address: Kirk Street/Ramsden Road/Eden Grove Capacity Deliverable and Developable Assessment - Savills Assessment: 600 DMBC Assessment: 930 Difference: -330 Savills Commentary - Brownfield site in poor market area. The site has not started construction, instead a process of remediation is currently ongoing with an EIA screening opinion submitted 12th August 2019. (ref: 19/01920/SCRE). Over 70% of the site is within Flood Zone 2 and 3. An ambitious build out rate has been included between years 6-15 of the plan at 70dpa. Site information - SHLAA: 843 Site Address: Manor Farm, Bessacarr Capacity Deliverable and Developable Assessment - Savills Assessment: 650 DMBC Assessment: 965 Difference: -315 Savills Commentary - Since outline planning was granted in 2001 up until July 2018 a total of 150 dwellings have been built, yet over a similar period of time the council envisage the site to deliver 965 units. The site is somewhat constrained by the rail network and as part of the Section 106 agreement requires a
crossing over the railway. This has implications to the viability of the site as this could be a normal cost of #1million (Section 106 under document ref: 00770997). Site information - SHLAA: 984 Site Address: Former McCormick Tractors International, Wheatley Hall Road Capacity Deliverable and Developable Assessment - Savills Assessment: 350 over first 10 years DMBC Assessment:600 over first 10 years Difference: -250 Savills Commentary - The site is entirely situated within Flood Zone 2 and 3. The site is brownfield and as such will have associated remediation which has delays and additional costs associated with it. An ambitious build out rate has been included between years 0-10 of the plan, which would require immediate start to construction and a build out rate of 64dpa. Site information - SHLAA: 836 Site Address: Carr Lodge, Land South of Woodfield Way, Woodfield Capacity Deliverable and Developable Assessment - Savills Assessment: 680 DMBC Assessment: 980 Difference: -300 Savills Commentary - The original outline planning application for this site was submitted in 2010 (ref: 10/001313/OUTA). Work on site started late 2014, after a Reserved Matters Application was submitted in 2013 (13/00073/REM). So far only 309 dwellings on the site have been completed, resulting in a build out rate of 30dpa between 2010-2019. Taking previous build out rates into consideration ambitious build out rates have been included between years 6-15 of the plan, which would require immediate start to construction and a build out rate of 70dpa. The most recent planning applications for the site, are for Reserved Matters applications for 8 dwellings (17/018811/MAT) and 12 dwellings (16/02512/MAT) indicating a very slow progress. TOTAL -1195 Figure 2: Initial Savills Assessment of Supply of large sites 3.44. Using our initial analysis of the larger residential allocations it shows a reduction in the supply of dwellings over the plan period by c. -1,195 dwellings. By carrying out a more realistic assessment of the sites and by incorporating industry standards it shows in correctly adjusting the number of dwellings in the MUA alone over the plan period now there is now a shortfall of -9,817 units. Recommendation 6: DMBC should allocate more land for housing given an overall shortfall within the Main Urban Area of -9,817 plots. In the interests of a positive, justified and effective plan.

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<td>Urban area housing supply in terms of allocations, commitments and reserve dwellings is 8,640. Against a corrected target of 17,626 dwellings, this is a shortfall of 8,622 dwellings. There are also concerns related to a number of allocations in the urban area. Wording to Policy 6 states 'much of the supply is not without constraints', showing the council are aware of issues and as a result perceived supply in the plan period. Two sites are problematic: McCormicks (984) is entirely in FZ2/3. Here the overreliance on brownfield has allowed a very constrained site to come forward at the detriment of DMBC's housing supply. Secondly, Manor Farm (843) is constrained by network rail and the S106 which requires a railway crossing, which has a viability impact. These two represent 46% of the urban area supply and the housing supply could therefore fall well below the required level. Table H1(A) shows that out of urban area permissions 57% have not started (27 sites). All but 5 are on previously developed land - it cannot be argued there should be a preference for brownfield over greenfield however the delay impacting supply must also be recognised. Brownfield can have numerous constraints, need remediation and even EIA screening which can add long delays. It may be more advantageous to include sustainable countryside sites as opposed to poorly performing brownfield. There are also challenges relating to achieving capital values on brownfield land, focussing on brownfield development could undermine sustainable development aspirations set out in the NPPF. The urban area also has unjustifiably high build out rates. The over reliance on these rates for large schemes looks to be a way of helping to meet the level of supply. McCormicks, Manor Farm and Kirk Street are examples of ambitious build out rates. Manor Farm has built just 141 units in 4 years since the original application, when it is projected to deliver 350 in the first 5 plan years. It is ambitious and dishonest to the plan period supply based on previous trends. There is an over reliance on small sites (10 units or less) within the urban area. There is an urban area saturation of small sites and a limited number of smaller house builders to build them all during the plan period. 70% of the small sites with a planning permission have not started as of April 2018. The following is an assessment of MUA housing supply: Site information - SHLAA: 938 Site Address: Kirk Street/Ramden Road/Eden Grove Capacity Deliverable and Developable Assessment - Savills Assessment: 600 DMBC Assessment: 930 Difference: -330 Savills Commentary - Brownfield site in poor market area. The site has not started construction, instead a process of remediation is currently ongoing with an EIA screening opinion submitted 12th August 2019. (ref: 19/01920/SCRE). Over 70% of the site is within Flood Zone 2 and 3. 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<td>Many ways of calculating housing supply have been provided, it is disputed that there is an undersupply, especially such a large one (almost 10,000 short according to the representation) when more than 7,000 houses are being allocated in the Main Urban Area. The Peter Brett’s Report explains how figures have been derived and the Housing Topic Paper explains the distribution of the housing requirement, with the Site Selection Methodology explaining the site selection work. The HELAA methodology explains build out rates, which were agreed with the stakeholder group early in the plan process. Site capacities based on either permission information or agreed densities and build out rates, or the most up to date information. Where appropriate, greenfield sites have been allocated.</td>
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Site Description

2.1. The Grange Farm site measures 11.2ha with wider landownership to the south and east measuring c.28 Ha in its entirety. It is located adjoining the Main Urban Area of Doncaster, directly south of Edenthorpe. The existing settlement boundary of Edenthorpe is located to the west and north of the site (Grid Reference: SE 61755 05966). This is shown on the enclosed Location Plan (Appendix 1). (SEE EMAIL FOR Appendices) 2.2. The site is adjacent to the south side of the A630, with its north western boundary at the junction between the A630 and the A18. The western boundary of the site runs the length of Sainsbury’s and its carpark, with the southern boundary of the site adjacent to Shaw Wood (designated SSSI). Discussions with Council Ecologists confirm this can be mitigated. 2.3. The site is currently in Agricultural use with a small number of agricultural buildings within the blue line area. A number of mature trees are located on the site but it is understood there are no TPOs. An access track for Grange Farm runs along the site’s eastern boundary. 2.4. There are a mixture of land uses near the site. The residential boundary of Edenthorpe lies to the north, on the other side of the A630. The town of Armthorpe lies beyond c.600m to the south of the site, separated by a number of fields. Edenthorpe provides a number of local amenities and facilities with a large convenience store adjacent (Sainsbury’s). Employment opportunities are located to the west of the site, and along the A630 to the east of the site at West Moor Park, where predominantly B8 storage and distribution businesses are located. Within the officer report to application 18/02592/OUTM, directly north west of the site it was written: "The site is in a highly sustainable location, close to services, facilities, existing infrastructure and public transport links." (Paragraph 8.33) 2.5. The Armthorpe Parish Council and Neighbourhood Plan boundary extends across the site, bordering the Westmoor Link Road, it therefore lies at the extreme north western edge but in reality bears a closer spatial relationship to the Main Urban Area. 2.6. In respect of sustainability, the site is located to the Main Urban Area of Doncaster as being well served by existing principal bus routes which run through the settlements of Armthorpe and Edenthorpe. The nearest bus stop is approx. 150 metres from the site and offers a high frequency bus service to Doncaster Town Centre (every 10 minutes). 2.7. The site is also well connected in terms of walking and cycling, with several well used routes nearby, for example, along Mere Lane and within Shaw Wood which is publically accessible. Site Context 2.8. The site is located adjoining the Main Urban Area of Doncaster, and is directly adjacent to Edenthorpe. The Main Urban Area is defined as the contiguous built-up area of Doncaster comprising a number of distinct but connected districts arranged around the town-centre. The Main Urban Area of Doncaster is the focus for housing development within the district. 2.9. Edenthorpe is regarded as a distinct local centre within the Main Urban Area. It has shops and services to meet day-to-day needs. The local centre is considered by Doncaster Metropolitan Borough Council (DMBC) as a sustainable location due to its high levels of access to alternative modes of transport, being located on a key bus route corridor, proximity to Doncaster Main Urban Area and varied community facilities and employment within and adjacent to the settlement. 2.10. Given the masterplan approach envisaged the site itself is well connected and forms a natural extension to the settlement, allowing for a contribution to the critical mass of residents to help support and sustain the existing facilities and economy. The site would also include design principles which continued the green wedge between Edenthorpe and Armthorpe. Planning Background 2.11. There is a pending hybrid application (reference: 12/02133/FULM) for 264 plots (detailed, phase 1) and outline for up to 300 plots (phase 2) on the land - up to 564 plots in total both of which were submitted in 2012. 2.12. In 2015 the hybrid application was formally reduced to a full application for 264 plots to take account of policy comments in respect of the green wedge -this is the site being brought forward within these representations. At the time the council expressed that the principle of development was not acceptable. There were also a number of outstanding matters including highways, public rights of way, public open space and premature in respect of the Armthorpe Neighbourhood Plan. The scheme was not taken to committee and instead held in abeyance. More recently however there have been a number of changes in circumstances which benefit the proposed site. These will be detailed within the Vision Document, at Appendix 2 and Chapter 4 of these representations. 2.13. The Armthorpe Neighbourhood Plan was adopted on the 22nd November 2018. The site lies at its extreme outer edge and is placed entirely in the Green Wedge. It sets out allocations but does not include the subject land. Like CS17, Policy ANP28 states that: "The Green Wedges overlay the Countryside Protection Policy Area designation and areas identified for development. Thus the identification of areas as being within a Green Wedge would not in itself exempt it from development." (Our emphasis). 2.14. We are currently discussing the land with Armthorpe Neighbourhood Plan, however it is our view that due to its poor spatial relationship with the settlement it will not impact on the fundamental principles, policies and aims of the plan.

Summary:

The site is 11.2ha with wider land ownership to the south and east measuring 28ha in total. The site adjoins the Main Urban Area and Edenthorpe is to the west and north. The site is south of the A630 with the NW boundary close to the junction between the A630 / A18. Impacts on Shaw Wood can be mitigated (has been discussed with Council ecologists). Site is agricultural. There are a mix of adjacent land uses, including housing in Edenthorpe to the north and fields separating the site from Armthorpe. Edenthorpe has a number of local amenities and there is employment at West Moor Park. The site is in the Armthorpe Parish Council boundary but better aligned spatially with the Main Urban Area. The site is served by a bus stop with high frequency services, as well as walking and cycling opportunities. The masterplan for this site considers that it is an extension of the urban area and supports services here, as well as continuing the green wedge between Armthorpe and Edenthorpe. There is a pending hybrid application 12/02133/FULM for 264 plots (detailed, phase 1) and outline for up to 300 plots (phase 2) on the land - up to 564 plots in total both of which were submitted in 2012. In 2015 this was reduced to a full application and the council expressed that that the
principle of development was not acceptable, and there were outstanding matters related to highways, PROW, open space and prematurity in the respect of the Armthorpe Neighbourhood Plan. It was held in abeyance. There have been a number of changes in circumstance since. The Armthorpe Neighbourhood Plan was adopted on the 22nd November 2018. The site lies at its extreme outer edge and is placed entirely in the Green Wedge. It sets out allocations but does not include the subject land. Like CS17, Policy ANP28 states that: "The Green Wedges overlay the Countryside Protection Policy Area designation and areas identified for development. Thus the identification of areas as being within a Green Wedge would not in itself exempt it from development." There is discussions with the Neighbourhood Plan but it has a poor spatial relationship with the settlement and does not impact on the principals, policies and aims of the plan.

Response:
Allocations in Armthorpe are set out in the Armthorpe Neighbourhood Plan. Unless a site has come forward as a commitment, no further allocations are being made here, and the settlement can comfortably meet its housing target, as per the Housing Topic Paper.
4.1. The land at Grange Farm represents a deliverable and developable site in accordance with the definitions contained with the NPPF. As part of the evidence base to substantiate the deliverability and developability a Vision Framework Document has been prepared and is included at Appendix 2. We welcome feedback and discussion from DMBC in terms of further targeted technical work in the interests of supporting a sound Local Plan. (SEE EMAIL FOR Appendices) 4.2. One of the key matters regarding the wider scheme was the impact on the Green Wedge between Armthorpe and Edenthorpe. In 2015 the scheme was formally reduced to a full application for just 264 plots to take in to account policy comments in respect of the green wedge, under application 12/02133/FULM. 4.3. The site is located adjoining the Main Urban Area of Doncaster, directly south of Edenthorpe and as such represents a Sustainable Urban Extension. Given the now reduced size of the site it would not impact on the neighbouring areas of Armthorpe and Edenthorpe from merging. 4.4. Further, the site represents a technically deliverable site capable of achieving sustainable growth in Doncaster in the following way: Landscape, Environment and Topography 4.5. The site will aim to make a positive contribution towards the management and enhancement of the landscape. The position of the site also provides the opportunity to create a clear defensible boundary between Armthorpe and Edenthorpe. 4.6. Landscaping is a key feature of the scheme especially due to the proximity to Shaw Wood SSSI. The majority of existing trees have been retained and new native trees and shrubs will be planted. The site provides a central area of open space and new buffer planting areas to take into account local views. The layout can also incorporate a wildlife corridor between Shaw Wood and Long Sandall Common. 4.7. A Phase 1 Ground survey was undertaken by Lithos Consulting, which proved that there were no fundamental constraints envisaged. This was later confirmed by the responses from the statutory consultee for the submitted application. 4.8. The majority of the site is not at risk from flooding, and is therefore within flood zone 1. A small area of the western part of the site is within Flood Zone 3, the extent of which has been agreed with the EA in earlier discussions. No development is proposed within Flood Zone 3 so it is a sequentially preferable site. Access, Highways and Transport 4.9. The early highways work indicates that safe access to the existing transport network, involving an adopted road can be successfully implemented. As part of the existing full application a number of specific design matters were highlighted, all of which are resolvable through the detailed working of the scheme. 4.10. More recently, the A630 West Moor Link improvement scheme was approved to include a new bridge, improve the width of the A18 carriageway and junction improvements. The work on the A18/A630 regeneration scheme started in July 2019. The improved road infrastructure will only help to alleviate some of the earlier transport concerns of the scheme. 4.11. In terms of public transport, the site is well served by existing principal bus routes which run through the settlements of Armthorpe and Edenthorpe. The nearest bus stop is approx. 150 metres from the site and offers a high frequency bus service to Doncaster Town Centre (every 10 minutes). 4.12. The site is located within the Main Urban Area of Doncaster as well as being well served by shops and services within the settlements of Armthorpe and Edenthorpe. 4.13. The site is also well connected in terms of walking and cycling, with several well used routes nearby, for example, along Mere Lane and within Shaw Wood. The site will offer improvements to existing road junctions and investment to improve existing and create new, safe pedestrian and cycle links. Design Principles 4.14. The Vision Document at Appendix 2 explores the physical and environmental character of the site and sets out how, by incorporating the following design principles, it can be brought forward in a way that enhances the surrounding area, these include: - Ensuring an appropriate amenity boundary between the site and existing residential properties; - The instatement of structural landscape within a framework of landscape and public open space approach across the site; - The retention of existing trees and hedgerows; - Provision of significant areas of publicly accessible green space as well as improvements to biodiversity through the new native species trees and shrubs planted on site; and - Maximising opportunities for pedestrian and vehicular access to the surrounding area. Deliverability 4.15. There are no known technical constraints (for example ecology, flood risk, drainage, ground and heritage) that would preclude this site coming forward. The outstanding matters raised within the current application of highways, Public Rights of Way and Public Open Space are all details which with further discussions with the council can be overcome. The site is under the control of a one landowner who is willing and able to develop their land, having already drawn up an agreement with house builder, Miller Homes. Miller Homes are a national housebuilder, with vast experience in delivering residential projects and producing places people want to live, ensuring deliverability of the site.

Summary:
Grange Farm is deliverable and developable in accordance with the definitions in the NPPF. A vision framework document has been drawn up. The revised site layout on the 2015 scheme now takes account of the green wedge concerns raised in the 2012 application. The site adjoins the urban area and is a sustainable urban extension. It now would not merge Armthorpe and Edenthorpe. It can contribute to delivering sustainable growth. The site will make a positive contribution towards the management and enhancement of the landscape. There will be a clear and defensible Armthorpe / Edenthorpe boundary created. The majority of existing trees have been retained and new native trees and shrubs will be planted. The site provides a central area of open space and new buffer planting areas to take into account local views. The layout can also incorporate a wildlife corridor between Shaw Wood and Long Sandall. There are no fundamental ground issues. The majority of the site is not at risk of flooding, no development is proposed in flood zone 3, so it is sequentially preferable. Safe access can be made to the existing transport network and all issues previously flagged regarding specific design can be resolved through detailed working of the scheme. The site is well located close to the A18 / A630 improvements which will only alleviate earlier concerns. It is well served by public transport with the nearest bus stop.
stop 150 metres away and has a high frequency service to Doncaster centre. The site is well served by shops in Edenthorpe and Armthorpe. It has good walking and cycling links which can be improved. It will include the following design principles: - Ensuring an appropriate amenity boundary between the site and existing residential properties; - The instatement of structural landscape within a framework of landscape and public open space approach across the site; - The retention of existing trees and hedgerows; - Provision of significant areas of publicly accessible greenspace as well as improvements to biodiversity through the new native species trees and shrubs planted on site; and - Maximising opportunities for pedestrian and vehicular access to the surrounding area. There are no technical constraints and outstanding matters of the current application are all details which can be overcome. The site has one owner who is willing to develop the land and has an agreement drawn up with a house builder - Miller Homes - a national house builder with experience in delivering residential projects and producing places people want to live in.

Response:
Comments and supporting site deliverability information are noted. However, the site is located within the parish of Armthorpe and is therefore within the designated boundary of the Armthorpe Neighbourhood Plan. Alternative sites in the Neighbourhood Plan area have been identified by the Neighbourhood Plan that are more than sufficient to meet the settlement’s Local Plan plan period target - see site selection methodology report and Armthorpe Neighbourhood Plan for more details.

CUSREF: 03008 Name: DLP Planning Ltd
Date: 30/09/2019 Organisation: DLP Planning Ltd
Representing: Mr R.J. Ogley

Comment Ref: C/Policy 6/03008/4/005
Attend Examination: Attend Hearing
Reason: To support the Representations Report and the Inspector’s understanding of the site.
Area: Chapter 16: Spatial Proposals
Policy: Main Town - Conisbrough-Denaby

Tests of Soundness:

Comment:
3.14 Policy 6 sets out that housing allocations will help to deliver the spatial strategy, meet the needs for housing and support sustainable communities. 3.15 The allocation of the site for housing under Policy 6 is supported in principle, and it is considered that the delivery of the site is essential in helping to deliver the spatial strategy for the Borough. 3.16 The site reference is 040, as shown in the map extract in Figure 2. (SEE EMAIL FOR Figure 2. Draft Local Plan Proposals Map Extract) 3.17 Table H2(D), which lists the Conisbrough housing allocations (without planning permission) as of 1st April 2018, describes the site as 8.91ha in size with an indicative capacity of 200 dwellings. The table also indicates that 175 dwellings are achievable in 6-10 years, and a further 25 dwellings are achievable in 11-15 years. The table does not describe any dwellings as being achievable in 0-5 years. 3.18 We object to the stated capacity and deliverable time scale for the site on the following grounds: 3.19 The site is considered to have a potential capacity of at least 234 dwellings based on a developable area of 80% and a density of 35 dwellings per hectare. There is a willingness from the landowner to market and develop the site as soon as possible given its unconstrained nature, and expressions of interest have been received from several developers. It is therefore considered that the site could come forward in the early stages of the plan period (0 - 5 years). Recommendation 3.20 We request that the information provided in Table H2(D) is amended to state that the site has an indicative capacity of at least 234 dwellings, and that development of at least 150 dwellings is achievable in 0 - 5 years.

Summary:
The allocation of site 040 under Policy 6 is supported in principle and it is considered that the delivery of the site is essential to helping deliver the boroughs spatial strategy. Object to the proposed capacity of site 040 and the delivery timescale. The site could accommodate 234 units (80% of the site developed at 35dpa), and there is a willingness to deliver this site as soon as possible - with interested developers who have submitted EOI’s, and no site constraints. Table H2 (D) should be amended to state the site capacity as being 234 units, and 150 deliverable in years 0 - 5.

Response:
Support noted. The site density has been based on a standard calculation, however Policy 6 stipulates that lower or higher densities will be supported if this can assist in the delivery of a better design solution.
2.1 The site at Sheffield Road comprises of approximately 9 hectares of land adjacent to the western settlement boundary of Conisbrough, as illustrated in Figure 1. (SEE EMAIL FOR Figure 1. Site Location) 2.2 The properties to the south west of the site (134, 136, 138 and 140 Old Road and the Hill Top Hotel) are not within the Ogley family’s ownership and they do not comprise part of the site. 2.3 The site comprises a single field of greenfield land which is currently in agricultural use (Grade 2). There are no known contaminants on the site. There is no previous planning history of relevance to the site. 2.4 There is an existing hedgerow around the perimeter of the site, and the topography of the site is relatively flat with a downward slope from north-west to south-east. 2.5 There are no public or private footpaths, or public rights of way, running through the site. 2.6 The site is located entirely within Flood Zone 1 on the Environment Agency’s flood maps, which means that the site has a less than 1 in 1,000 annual probability of flooding from a river or sea. The site is also at very low risk from surface water flooding, which means that each year the site has a less than 0.1% chance of flooding from surface water. It is of note that the National Planning Practice Guidance sets out that residential development is an appropriate land use in Flood Zone 1 areas (Paragraph 066, reference ID 7-006-20140306). 2.7 Access to the site could be obtained primarily from Sheffield Road to the south and / or Old Road to the west. It is of note that there are three existing dropped kerbs along the south-east boundary. There could be opportunities for access to be provided from the cul-de-sacs located to the north-east of the site. It is considered that residential development on the site would not create a demonstrably adverse impact on highway safety or volumes of traffic in the surrounding area. Available. 2.8 The site is held in trust by Mr James Ogley and his son Mr Anthony Ogley on behalf of the Ogley family. There has been frenetic interest in the site in the last few months alone by several substantial developers who the land owners have had correspondence and / or meetings with. Several of the developers have also suggested head of terms. Further to this, the land owners are also expecting more approaches in the upcoming months. Suitable. 2.9 There are no physical constraints to suggest that carefully designed residential development could not be brought forward during the plan period. 2.10 The issue of limestone underlying the site has previously been raised as a constraint by the Council. However, the area is not safeguarded for this particular use. Deliverable. 2.11 Given the size of the site and its potential capacity, the site provides opportunities to deliver vast developer contributions such as affordable housing, education and open space, subject to viability. 2.12 The Housing and Economic Land Availability Assessment (HELAA) housing map identifies the site as a deliverable / developable site for housing which does not currently have planning permission. This is supported. 2.13 The HELAA 2017 - 2018 update describes the site as having a capacity of 200 dwellings, 175 of which are considered achievable in 6-10 years and 25 of which are considered achievable in 11-15 years. 2.14 Further to the above, it is understood that in the 2011 SHLAA the Council envisaged that the site would be developed in 5-10 years. 2.15 We request that the information provided in the HELAA is amended to state that the site has an indicative capacity of at least 234 dwellings, and that development of all 234 dwellings is achievable in 0 - 5 years. 2.16 The site is considered to have a potential capacity of at least 234 dwellings based on 80% developable area and a density of 35 dpa. There is also a willingness to develop the site as soon as possible given its unconstrained nature. It is therefore considered that the site could come forward in the early stages of the plan period (0 - 5 years). Sustainability. 2.17 There are several local facilities and services located in close proximity to the site, including, but not limited to, the following: - Conisbrough Ivanhoe Primary Academy - Located to the north (< 500 metres) - Pennine View School - Located to the north (< 500 metres) - Supasave food store - Located to the north east (< 600 metres) - Old Road football pitches / Denaby United Football Club - Located to the north (< 700 metres) - Conisbrough cemetery - Located to the east (< 800 metres) - Conisbrough community centre - Located to the north east (< 1.3 kilometres) - Conisbrough Baptist Church - Located to the north east (< 1.4 kilometres) - Waites Cash & Carry - Located to the north east (< 1.5 kilometres) - Conisbrough post office - Located to the north east (< 1.5 kilometres) - Weldricks (Pharmacy) - Located to the north east (approximately 1.5 kilometres) - Sainsbury’s Local - Located to the north east (approximately 1.5 kilometres) 2.18 In addition to the above, it is of note that Conisbrough train station is located approximately 2 kilometres to the north east of the site. Northern services to Hull and Sheffield are available from the station. 2.19 There are also six bus stops (three per direction) located 400 metres or less to the north / north east of the site which provide access to the X78 bus (a first bus). There are several X78 services per hour during the day on all days of the week. The service provides access to Doncaster, Rotherham, Meadowhall and Sheffield.

**Summary:**

Properties to the south west of the site (134 - 140 Old Road) are not in the ownership of the land owner and not part of the site. The site is a single field, Grade 2 agricultural land with no known contamination or previous planning history. The site is relatively flat and bound by hedgerow. There are no paths or public rights of way. It is flood zone 1 and also at low risk of surface water flooding too. Access is achievable from Sheffield Road or Old Road. There are existing drop kerbs to the south eastern boundary. There are potential access points from cul de sacs to the north. There are not considered to be any highway impacts arising as a result of developing this site. The land is in familial ownership and there have been meetings with prospective developers. There are no physical constraints to suggest carefully designed residential could come forward. The issue of limestone underlying the site has been raised, however the land is not safeguarded for this use. The size of the site would allow the developer to make contributions to affordable housing, open space and education subject to viability. The HELAA conclusions for the site are supported. The site capacity should be recorded as 234 units, not 200, and the site deliverable in 0 - 5 years. This is based on 80% developable area and a density of 35dpa. There is a willingness to develop the site as soon as possible as it is unconstrained. The site is close to...
several local facilities and services, including schools, food stores, sport pitches, a cemetery, churches, cash and carry, post office and pharmacy. Conisbrough train station is also 2km away. There is also convenient access to the X78 bus via a number of nearby bus stops.

Response:

Comments noted. The red line boundary excludes the dwellings to the south west, and with regards to the capacity, this is based on a density agreed with the stakeholder group as per the HELAA Report. Policy 6 allows for higher or lower densities where they would result in a better design solution.

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1.1 This Local Plan Representation has been prepared by DLP Planning Ltd on behalf of Mr James Ogley in response to the publication of the draft Doncaster Local Plan for consultation (Regulation 19). 1.2 This representation relates to "Land off Sheffield Road, Conisbrough" which remains available, developable and deliverable for residential development. 1.3 The site is proposed as a housing allocation (site ref. 040) in the draft Local Plan document. This representation supports the allocation of the site for housing, however raises objection to the stated capacity of the site and the time period for delivery. 1.4 This representation should be read alongside the formal response form that has also been completed and submitted in relation to the site. 1.5 The site has previously been promoted by DLP Planning Ltd in the following consultations: - Sites and Policies Development Plan Document - September 2013 - Call for Sites - October 2014 - Issues and Options - Summer 2015 - Vision, aims and objectives - Summer 2015 - Homes and Settlements - April 2016 1.6 The structure of this representation will be as follows: - Description of the site including sustainability for development in Section 2; - Comments on the draft Local Plan policies in Section 3; and - Conclusion in Section 4.

Summary:

Site 040 remains available, developable and deliverable. The allocation is supported but there is an objection to the stated capacity of the site.

Response:

Support noted. Policy 6 allows for higher or lower densities where they would result in a better design solution.
We have previously submitted representations on behalf of MerryVale Developments for land at Conisbrough. The Green Belt is drawn tightly around Conisbrough, which has the consequent impact of limiting growth opportunities for the town. The MerryVale Developments site lies to the south-west of Conisbrough, on land between Drake Head Lane and Hereward Court. It is currently within the Green Belt and was considered in the Council’s Green Belt Review under the reference ‘Conisbrough 825: Fields off Drake Head Lane, Conisbrough’. We have previously proposed its removal from the Green Belt as a sustainable location for growth in Conisbrough. With regard to the Publication Version Local Plan specifically, we support the identification of Conisbrough as a ‘Main Town’ which will accommodate development with the main focus of growth in the Doncaster Urban area. It is logical that the main focus of growth remains around the Doncaster Urban Area. However, it is not sustainable to deliver all the requisite dwellings for the entire Borough in one place; therefore identifying the Main Towns as areas for growth, in combination with the focus at Doncaster is a sensible and sustainable solution to delivering the housing for the Borough. This is also crucial in ensuring that local housing needs are met locally. Whilst we broadly support the housing numbers directed to the Main Towns, as identified in the settlement hierarchy, the numbers proposed for Conisbrough and Denaby (465 - 975) contain a significant margin of difference. It is important that the Council builds flexibility into the Plan which does not stifle the growth potential. In this regard, it is important that the higher figure in the range is not seen as a maximum figure. Should the housing needs situation change over the Plan period it is crucial for the Plan’s sustainability that it is flexible enough to provide further development if and when the need arises. This should be made explicit in the Plan. In this regard, we are disappointed that land at Conisbrough, as identified above, has not been removed from the Green Belt or allocated in the Local Plan. The site presents an opportunity to deliver additional housing as necessary which could ‘round-off’ the settlement without detriment to the wider area and without encroachment toward other settlements, as the site does not extend beyond the current extent of Conisbrough in this area.

Summary:
The Green Belt is tightly drawn in Conisbrough and this limits growth. Support the identification of Conisbrough as a Main Town to deliver sensible and sustainable housing for the borough. This is crucial in ensuring local needs are met locally. Broadly support housing numbers and the range for Conisbrough contains a significant margin of difference. It is important flexibility is built in which does not stifle growth potential. The higher range figure should not be a maximum figure. Should housing needs change over the plan period, it is crucial for the plans sustainability that is flexible enough to provide further development if the need arises. This should be made explicit. Disappointed that the land has not been removed from the Green Belt and allocated. The site presents the opportunity to provide additional housing and round off the settlement without detriment to the wider area and without encroachment towards other settlements, as the site does not extend beyond Conisbrough.

Response:
General support for approach to housing at Conisbrough Denaby is noted. The Site Selection Methodology and Green Belt Topic Paper elaborated on why this site has not been preferred for housing here, and why other sites are preferable.
This representation has been prepared by Chartered Town Planning Consultants, John Handley Associates Ltd. It is submitted on behalf of the Klondyke Group Ltd, the owners and operators of the Strikes Garden Centre/Stringers Nurseries which is located on Crookhill Road, Conisbrough. The Strikes Garden Centre/Stringers Nurseries is a long established commercial garden centre business which operates as a successful and busy retail destination with an extensive car park, display areas and ancillary coffee shop. In addition to the existing garden centre at Crookhill Road, the Klondyke Group Ltd own land to the north and east. Following on from our submission to the Draft Policies and Proposed Sites Consultation in October 2018, and our Call for Sites Submission in 2017 we would request that this site (Housing Site 1000) is removed from the Green Belt and allocated as a new housing development opportunity. We have provided a summary of our earlier submission below, and have also attached a site location plan and indicative layout plan showing the extent of the proposed development site and its potential to accommodate new housing. The Local Plan Site Selection Methodology for sites within Conisbrough and Denaby is published as part of the Local Plan Evidence Base. This Methodology document rejects the site as a housing allocation on the basis that “the site is currently designated as Green Belt and the findings from the Phase 3 Green Belt Review concludes there is a moderately weak case for inclusion in further site selection work.” We disagree with this conclusion and have set out below our justification why the site should be allocated in the new Local Plan as a housing development opportunity. Requirement for Additional Housing Land to be Allocated In terms of the requirement for additional housing land in this area, Policy 3 of the Local Plan includes a target of between 465 - 975 new houses to be allocated for the Conisbrough - Denaby area. Paragraph 16.70 of the Local Plan confirms that there is an overall plan period housing supply of 528 new homes. A large brownfield reserve site capable of accommodating 325 further dwellings is identified at the former Earth Centre, Conisbrough. However, the Local Plan notes that this site has not yet passed the flood risk sequential and exceptions tests. It cannot therefore be confirmed as an effective housing site. The combined total number of housing units is 853 including the reserve site. On this basis, there is scope within the wider target of 975 houses for additional housing land to be allocated in the new local plan. In particular our client’s site which is located to the north of Stringers Garden Centre, Crookhill Road, Conisbrough should be removed from the Green Belt and allocated as a new housing site. The site is effective and deliverable in the short term and can contribute to the continuing housing land shortfall that has been identified in this area. Proposed Development The Klondyke site is located to the north and east of the existing garden centre operation, adjacent to existing housing and other built development. The site extends to 2.0 hectares and is surplus to operational requirements associated with the garden centre, it is therefore available for development and could deliver approximately 50 to 60 houses. Access can be provided from the existing access off Crookhill Road, with appropriate improvements and segregation of the existing garden centre parking and delivery areas. There is sufficient land along the frontage of the existing operations to rationalise the existing access and car parking arrangements to provide a separate access into the proposed housing development. The scale and density of development on the site would reflect that of the existing, established housing to the west, and the new housing area would represent a logical expansion of the existing housing adjacent. To reflect the site’s location on the edge of the existing settlement a new landscaped boundary could be provided as an integral part of the new development, and this would help to define and strengthen the Green Belt boundary in this location. Through a separate representation it is also proposed that the operational garden centre site is removed from the Green Belt as it is intensive built development and a non-conforming Green Belt use. This would further strengthen the Green Belt boundary at this location. Opportunities to improve pedestrian and cycle access could also be provided as an integral part of the new development, as well as enhancements to local habitats through native species planting. It is considered that the current review of the Local Plan provides an opportunity to assess the site’s contribution to the Green Belt and seek its allocation for new development. Given the surrounding uses, it is considered that residential development would be the most appropriate and viable new use for this former nursery site. This approach would “tie in” with the existing housing to the west, and would provide for a “rounding-off” of the existing settlement whilst also providing a new landscaped edge, ensuring the threat of coalescence is avoided between settlements. Summary Given the site’s location adjacent to existing housing and other built development, and its previous nursery uses, it is requested that the 2.0 hectare site lying to the north and east of the existing garden centre should be released for development with capacity for the delivery of approximately 50 to 60 houses. Whilst it is acknowledged that the site is currently covered by Green Belt policy, which places restrictions on most forms of new development, in order for the Council to meet its housing land requirements, sites which are currently in the Green Belt will have to be released as part of the local plan review. On this basis, and on behalf of the Klondyke Group Ltd, we would request that the 2.0 ha site at Crookhill Road, Conisbrough (as shown in the attached location plan) is allocated as a new housing development opportunity in the new local plan. In addition to the submitted location plan, we have also provided a copy of the indicative layout plan and supporting statement that accompanied our submission in August 2017. These provide further information in support of this latest submission. In summary, this site is an available, deliverable and viable new housing site, and for the reasons set out above we would urge Doncaster Council to support its removal from the Green Belt and its allocation as a new housing site for the development of 50 to 60 houses in the new Local Plan. PROPOSED CHANGE Requested Changes For the reasons set out above, we would request that the 2.0 ha site at Crookhill Road, Conisbrough (as shown in the attached location plan and identified as Housing Site 1000) is removed from the Green Belt and allocated as a new housing development opportunity with capacity for the development of 50 to 60 houses. (SEE EMAIL FOR Plans and 2017 Submission)
Summary:

Request that site 1000 is removed from the Green Belt and allocated for housing. Disagree with the conclusions of the Green Belt Review. The allocated sites in Conisbrough total 528 units + 325 on a reserve site - 853 in total and therefore short of the target of 975 homes. The site should be removed from the Green Belt and allocated - it is effective and deliverable in the short term and can contribute to the identified shortfall in the area. The site can deliver 50 - 60 houses with access from Crookhill Close, with appropriate improvements and segregation of existing garden centre parking / delivery areas. There can be a separate access to the housing development. New housing would reflect the existing housing to the west and a logical expansion of the existing adjacent housing. A new landscaped boundary could provide a strengthened Green Belt boundary in the area. Separately, it is also to be requested that the garden centre is removed from the Green Belt as it is insensitive development and non-conforming with Green Belt use. This would also strengthen the boundary. There can be improved walking / cycling / habitat enhancement. Residential development would be the most appropriate use for this former nursery site. This would tie in with the existing housing to the west and round off the settlement with a new landscaped edge which avoids the threat of coalescence between settlements. Indicative layout provided. Requested change: remove the site from the Green Belt and allocate as a residential site for 50 - 60 houses.

Response:

It is unclear what the objection to the Green Belt Review conclusions for this site are, however, as shown in the Green Belt Topic Paper, there are no exceptional circumstances for releasing further land in this location, and despite the reserve development site not actually counting towards housing totals here, Conisbrough & Denaby can get within its housing target range without releasing any further sites such as this. It should also be noted that the Green Belt Review indicates that there may be more preferable sites in Green Belt terms in this settlement.
**Covering Email:** We refer to your recent email inviting comments on the Draft Local Plan. On behalf of the Klondyke Group Ltd, the owners and operators of the Strikes Garden Centre/Stringers Nurseries which is located on Crookhill Road, Consibrough, we enclose a completed Representation Form requesting that the site of the current garden centre operation is removed from the Green Belt and identified as part of the exiting built-up area and falling within the Consibrough settlement boundary. As set out in the attached Representation Form, the Strikes Garden Centre/Stringers Nurseries is a long established commercial garden centre business which operates as a successful and busy retail destination with an extensive car park, display areas and ancillary coffee shop. The existing garden centre site extends to 1.769 hectares, and the extent of the existing operation is confirmed in the attached site location plan. (SEE EMAIL FOR LOCATION PLAN) The garden centre is a long established, intensive built development involving large scale retailing and ancillary commercial uses set within an area of car parking and storage areas. These uses on the site do not conform with Green Belt policy and the garden centre site should therefore be removed from the Green Belt and included within the Consibrough settlement boundary. We trust this request can be accommodated and would be happy to discuss this further with you. Please note, we have also made a separate submission requesting that the land to the north and east of the garden centre operation is allocated for residential development as Housing Site Ref: 1000. FORM: Strikes Garden Centre/ Stringers Nurseries, Crookhill Road, Consibrough

This representation has been prepared by Chartered Town Planning Consultants, John Handley Associates Ltd. It is submitted on behalf of the Klondyke Group Ltd, the owners and operators of the Strikes Garden Centre/Stringers Nurseries which is located on Crookhill Road, Consibrough. The Strikes Garden Centre/Stringers Nurseries is a long established commercial garden centre business which operates as a successful and busy retail destination with an extensive car park, display areas and ancillary coffee shop. The existing garden centre site extends to 1.769 hectares. It forms part of the built-up area of Consibrough and lies adjacent to existing built development. The extent of the existing operation is confirmed in the attached site location plan which has been submitted in support of this representation. Further to our submissions at the earlier consultation stage on this site, we therefore request that this operational garden centre development is removed from the Green Belt and identified on the Consibrough Denby Proposals Map as part of the exiting built-up area and falling within the Consibrough settlement boundary. Justification for Proposed Changes The Stringers Garden Centre is a long established, intensive built development involving large scale retailing and ancillary commercial uses set within an area of car parking and storage areas. It forms part of the built-up area. These existing and long established uses on the site do not conform with Green Belt policy and should therefore be removed from the Green Belt. Furthermore, the garden centre operation is visually and physical connected to the existing settlement and functions as part of the exiting settlement. It is a valuable local facility which helps to meet the local area’s retail needs. It should therefore be designated as falling within the exiting built-up area and within the Consibrough settlement boundary. We have also made a separate submission, requesting that the land to the north and east of the garden centre is allocated for residential development. As part of this separate proposal a new landscaped boundary could be provided which would help define and strengthen the Green Belt boundary at this location. The removal of the garden centre site from the Green Belt would, however, allow for a more robust and defined edge to the Green Belt at Consibrough. Requested Changes For the reasons set out above, we would request that the site of the existing Stringers Garden Centre at Crookhill Road, Consibrough (as shown in the attached location plan) is removed from the Green Belt and identified on the Consibrough Denby Proposals Map as part of the exiting built-up area and falling within the Consibrough settlement boundary.

**Summary:**

Request that the current garden centre operation is removed from the Green Belt and identified as part of the existing built up area and falling within the Consibrough settlement boundary. This is a long established site with retail, a coffee shop and extensive car parking. The uses do not conform with Green Belt policy and should therefore not be in the Green Belt. The garden centre is visually and physically connected to the existing settlement and functions as part of it. It is a valuable local facility meeting local retail needs and should therefore be included in the settlement boundary. Proposed change: request the garden centre is removed from the Green Belt and included within the settlement boundary for Consibrough.

**Response:**

This matter is covered in the Green Belt Topic Paper. There are no exceptional circumstances to justify this and doing so would replace a strong boundary with a weaker one. The use is acceptable in the countryside / Green Belt.
Harworth Group maintains its objection to the draft Local Plan specifically in relation to the omission of land at Hill Top Road / Eland Road, Denaby Main (site 1035) for employment and housing development which it considers to arise from the deficiencies in the preparation of the Plan that result in the Publication Version being unsound. 2. In particular, the distribution of development and the allocations proposed in the Publication Version are not justified on the basis of available evidence and do not represent an appropriate strategy when considered against other reasonable alternatives. 3. During the preparation of the Plan, Harworth Group has proposed the allocation of 11.5 ha of land in its control off Hill Top Road / Eland Road, Denaby Main for development comprising employment use (c. 4.2 ha) and housing (c. 7.3 ha). Such development would contribute approximately 7,000 sqm of employment space and around 200 houses to meet the needs of the borough in a sustainable manner. 4. Whilst currently within the Green Belt, site 1035 is considered to be suitable and deliverable for development in a sustainable manner given that it abuts the existing urban area (both an employment area to the north and a housing area to the east), is in arable agricultural use and of limited ecological value, and is bounded by existing belts of trees which would be retained. 5. Our objection to the Publication Version Local Plan in relation to Conisbrough & Denaby comprises the following points: i. Policy 3 ‘Level and Distribution of Growth’ fails to satisfactorily direct light industrial, manufacturing and small scale distribution to the Main Towns, and in particular those in the west of the borough. ii. Policy 4 and the associated Table 4 fail to allocate any land for employment development in the Main Town of Conisbrough & Denaby. iii. Policy 6 and the associated Table H2(D) allocate site 040 and site 383 for housing development without satisfactory evidence to demonstrate these to represent the most appropriate strategy when considered against other reasonable alternatives. iv. The Council’s Green Belt Assessment and related Site Selection Methodology result in the proposed removal of land from the Green Belt (site 040) which does not represent the most preferable option when considered in real terms, and propose allocation of land for development that is of significant value for biodiversity and open space for recreation/amenity (site 383). v. The allocation of Harworth Group’s site 1035 is demonstrated to be a preferable alternative in that it would facilitate development that is more sustainable, less harmful and of greater benefit than those sites proposed to be allocated for housing and address the omission of any land for employment development in this Main Town. 6. Besides the above, Harworth Group maintains the concerns set out in its representations of October 2018 in relation to the overall quantum of development and its distribution across the Borough.

Summary:
Distribution of development and allocations are not an appropriate strategy when considered against alternatives. Site 1035 can deliver housing and employment. May be Green Belt but can deliver a sustainable site and is suitable and deliverable. It abuts the urban area and is of little value as it is. Object on: i. Policy 3 ‘Level and Distribution of Growth’ fails to satisfactorily direct light industrial, manufacturing and small scale distribution to the Main Towns, and in particular those in the west of the borough. ii. Policy 4 and the associated Table 4 fail to allocate any land for employment development in the Main Town of Conisbrough & Denaby. iii. Policy 6 and the associated Table H2(D) allocate site 040 and site 383 for housing development without satisfactory evidence to demonstrate these to represent the most appropriate strategy when considered against other reasonable alternatives. iv. The Council’s Green Belt Assessment and related Site Selection Methodology result in the proposed removal of land from the Green Belt (site 040) which does not represent the most preferable option when considered in real terms, and propose allocation of land for development that is of significant value for biodiversity and open space for recreation/amenity (site 383). v. The allocation of Harworth Group’s site 1035 is demonstrated to be a preferable alternative in that it would facilitate development that is more sustainable, less harmful and of greater benefit than those sites proposed to be allocated for housing and address the omission of any land for employment development in this Main Town.

Response:
Policy 3 supports the uses mentioned and directs them to suitable Borough locations. Enough employment allocations have been made in suitable locations to meet the employment requirement. There is no need to utilise Green Belt land for this purpose. There are existing employment opportunities in the local area and the wider Dearne Valley. With regards to housing, suitable sites have been allocated, including 383 (adjacent, not Green Belt) and 040, which was assessed in the Green Belt review as having a stronger case for removal and justifiable exceptional circumstances. Other non - allocated local sites also scored more preferably in strength of case for Green Belt release. There are no exceptional circumstances to justify adding site 383 into the Green Belt, and this is a suitable site for development. Site 1035 scored as having a moderate case overall, and on balance there are no exceptional circumstances to release this site, and Conisbrough & Denaby can get within their housing range. There are also access concerns to the site.
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<td>Reason:</td>
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**Tests of Soundness:**

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**Comment:**

18. Harworth Group supports the direction of substantial housing development to Conisbrough & Denaby (and advocates a quantum towards the higher end of the identified range of 465-975 homes). However, the crux of this representation in relation to housing is the site selection in that the Council’s proposed allocations do not represent the most appropriate strategy, in terms of suitability and deliverability, when considered against other reasonable alternatives as required for the Plan to be justified and sound. 19. The draft Plan proposes the allocation of site 383 and site 040 for housing to deliver a total of 325 dwellings (125 and 200 respectively). Harworth Group contends that its site ref 1035, which is able to deliver c.200 dwellings, represents a more suitable and sustainable option than these sites, as discussed below. 20. The ‘Housing and Employment Sites Selection Methodology and Results Report (June 2019)’ indicates (at p158) that a further 262 dwellings are required to be allocated at Conisbrough & Denaby to meet the housing need, with further being required to contribute to any higher economic growth-led housing target. To meet this requirement, the Council assesses 5 prospective sites: numbers 040, 383, 435, 826 and 1035. These are assessed in two stages: first the non-Green Belt sites, and second the Green Belt sites. 21. Sites 383 and 435 are considered first as they are not within the Green Belt. Site 435 is rejected as it is an employment site and is therefore not considered further in these representations. Site 383 is proposed to be allocated for 125 dwellings, leaving a requirement for 137 units to meet the housing need target. The three remaining sites within the Green Belt are then assessed. 22. Given the specific nature of site 383, Harworth Group objects to the sequential preference of this site as a non-Green Belt site ahead of assessment of other potential sites at Conisbrough & Denaby which are currently Green Belt. 23. This is because, in physical and locational terms, site 383 is essentially meeting the definition of and serving the purpose of Green Belt. The only reason it is not Green Belt is that it is an allocated site from the preceding Plan (which itself raises questions about its attractiveness and deliverability), and not for any reason relating to its physical nature, location or function. The site is wrapped-around by Green Belt, is undeveloped and open, and at present forms a substantial part of the gap between two separate developed areas of the Conisbrough and Denaby Main settlements. 24. It is therefore strongly contended that the 4 prospective sites at Conisbrough & Denaby (i.e. excluding site 435) should be assessed equally i.e. without preference being given to greenfield non-Green Belt sites in this location. 25. This fresh assessment would seek to identify those sites which meet the housing need in the most sustainable manner, represent the most suitable employment site(s), protect biodiversity and open space for sports and recreation, and best preserve the overarching function of Green Belt around Conisbrough & Denaby. Within this assessment, consideration should be given to the designation of non-Green Belt land as Green Belt where the requirements of national planning policy are met.

**Summary:**

Site 1035 (Hill Top Denaby - Rejected Housing Site) It is contended that the 4 prospective sites at Conisbrough & Denaby (i.e. excluding site 435) should be assessed equally i.e. without preference being given to greenfield non-Green Belt sites in this location. This fresh assessment would seek to identify those sites which meet the housing need in the most sustainable manner, represent the most suitable employment site(s), protect biodiversity and open space for sports and recreation, and best preserve the overarching function of Green Belt around Conisbrough & Denaby. Within this assessment, consideration should be given to the designation of non-Green Belt land as Green Belt where the requirements of national planning policy are met.

**Response:**

There is no reason to disregard an available non-Green Belt site on the basis that the consultee states that it should be Green Belt. The fact is that it is not, and therefore such non-Green Belt sites should be the first to be considered for allocation. Failing finding enough suitable non-Green Belt sites, Green Belt land was considered, as is the case in Conisbrough. All sites have been assessed in the Sustainability Appraisal and where necessary in the Green Belt Review, which has informed decision making on sites.
Comment: Please see attached statement which provides full explanation and justification for Harworth Group's objection to the Publication Version Local Plan in relation to Conisbrough & Denaby, which comprises the following points: 3. Policy 6 and the associated Table H2(D) allocate site 040 and site 383 for housing development without satisfactory evidence to demonstrate these to represent the most appropriate strategy when considered against other reasonable alternatives. Given the above, it is considered that Publication Draft Local Plan does not meet the tests of soundness insofar as it must be justified on the basis of evidence and represent an appropriate strategy when considered against other reasonable alternatives. A 'reasonable alternative' which represents a more sustainable and preferable form of development is put forward by Harworth Group and described in the attached statement. Suggested changes to the Plan that are required to achieve this preferable 'reasonable alternative' are summarised below. PROPOSED CHANGE Please see attached statement which provides full explanation and justification for Harworth Group's suggested changes to the Publication Version Local Plan in relation to Conisbrough & Denaby which are summarised below. These changes are required to ensure that the Plan is justified on the basis of evidence and represent an appropriate strategy when considered against other reasonable alternatives. Policy 3 should be amended to include within the table a criterion to facilitate allocation of further land for employment use which is well located in relation to the existing urban area of the Main Towns, as follows: Location: Employment - Light Industry & Manufacturing: Rail and manufacturing, particularly advanced manufacturing Local employment (including small scale distribution), Low carbon and "green industries" (including renewable energy) Location: Main Towns Employment - Light Industry & Manufacturing: As Doncaster Main Urban Area. Locations within and accessible to the existing town Unity (Hatfield Power Park and associated business parks) Table 4 (as referenced from Policy 4) should be amended to include the allocation of land at Conisbrough & Denaby for employment development as follows: Table 4: Employment Site Allocations Ref: 001 Address/ Location: Junction 6 M18, Thorne North Gross site area (Ha): 73.63 Area available for employment use (ha): 73.63 Ha to be developed in plan period: 51.54 Ref: 092 Address/ Location: Balby Carr Gross site area (Ha): 11.25 Area available for employment use (ha): 11.25 Ha to be developed in plan period: 8.60 Ref: 258 Address/ Location: Site 1, Middle Bank, Balby Gross site area (Ha): 8.48 Area available for employment use (ha): 5.00 Ha to be developed in plan period: 5.00 Ref: 441 Address/ Location: Land at Carcroft Common, Carcroft Gross site area (Ha): 49.28 Area available for employment use (ha): 24.64 Ha to be developed in plan period: 12.32 Ref: 941 Address/ Location: RHADS Site 1, Phase 4 Business Park Gross site area (Ha): 68.54 Area available for employment use (ha): 68.54 Ha to be developed in plan period: 68.54 Ref: 1032 Address/ Location: Bankwood Lane, Rossington Gross site area (Ha): 17.68 Area available for employment use (ha): 17.68 Ha to be developed in plan period: 17.68 Ref: 1035 Address/ Location: Land at Eland Road, Denaby Main Gross site area (Ha): 4.2 Area available for employment use (ha): 4.2 Ha to be developed in plan period: 4.2 [Plus other sites as appropriate] The following changes should be made to the site allocations and land designations as shown on the Policies Map: Site 1035 should be removed from Green Belt and allocated for employment (in part - 4.2 ha) and housing development (in part - 7.3 ha) with the settlement boundary adjusted to suit. Development of this site would deliver c.7,000 sqm of employment space and up to approximately 200 houses. Site 383 (in its current form) should be deallocated for housing and instead designated as Green Belt. To fully meet local housing need, the Council should consider identifying further land at Conisbrough & Denaby for housing which may be in the form of a reduced extent of site 040 and/or 383 (i.e. that preserves the biodiversity/amenity function and limits green belt incursion) or other suitable site. Accordingly, Table H2(D) of the Publication Version Local Plan should be amended as follows: Table H2(D): Allocations without planning permission (as at 1st April 2018): (SITE 040 AND 383 SHOWN AS STRIKE THROUGH BUT CANNOT BE SHOWN) Site Ref: 1035 Address: Land off Hill Top Road, Denaby Main Site Area (Ha): 7.3 Indicative Capacity (No of houses): 200 Achievability (deliverable & developable) - 0-5 Yrs: 0 5-10 Yrs: 200 11-15 Yrs: 0 15-17 Yrs: 0 Beyond Plan Period: 0 Site Ref: Address: [Reduced extent of site 040 or 383 or other suitable site] Site Area (Ha): Indicative Capacity (No of houses): 125 Achievability (deliverable & developable) - 0-5 Yrs: 0 5-10 Yrs: 125 11-15 Yrs: 0 125 15-17 Yrs: 0 Beyond Plan Period: 0

Summary:
Policy 6 and the associated Table H2 (D) Allocates site 040 and site 383 for housing development without satisfactory evidence to demonstrate these to represent the most appropriate strategy when considered against other reasonable alternatives

Response:
The evidence to support these is contained in a range of evidence base papers, including the Site Selection Methodology, Housing Topic Paper and Green Belt Review / Green Belt Topic Paper. The detailed background site work is not repeated in the Local Plan for brevity.
Please see attached statement which provides full explanation and justification for Harworth Group’s objection to the Publication Version Local Plan in relation to Conisbrough & Denaby, which comprises the following points: 5. The allocation of Harworth Group’s site 1035 is demonstrated to be a preferable alternative in that it would facilitate development that is more sustainable, less harmful and of greater benefit than those sites proposed to be allocated for housing and address the omission of any land for employment development in this Main Town. Given the above, it is considered that Publication Draft Local Plan does not meet the tests of soundness insofar as it must be justified on the basis of evidence and represent an appropriate strategy when considered against other reasonable alternatives. A ‘reasonable alternative’ which represents a more sustainable and preferable form of development is put forward by Harworth Group and described in the attached statement. 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Development of this site would deliver c.7,000 sqm of employment space and up to approximately 200 houses. Site 383 (in its current form) should be reallocated for housing and instead designated as Green Belt; open space, sports and recreation; and as a local wildlife site. Site 040 (in its current form) should be omitted as a housing allocation and retained as Green Belt. To fully meet local housing need, the Council should consider identifying further land at Conisbrough & Denaby for housing which may be in the form of a reduced extent of site 040 and/or 383 (i.e. that preserves the biodiversity/amenity function and limits green belt incursion) or other suitable site. 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Response:

Enough employment allocations have been made in suitable locations to meet the employment requirement. There is no need to utilise Green Belt land for this purpose. There are existing employment opportunities in the local area and the wider Dearne Valley. With regards to housing, suitable sites have been allocated, including 383 (adjacent, not Green Belt) and 040, which was assessed in the Green Belt review as having a stronger case for removal and justifiable exceptional circumstances. Other non-allocated local sites also scored more preferably in strength of case for Green Belt release. There are no exceptional circumstances to justify adding site 383 into the Green Belt, and this is a suitable site for development. Site 1035 scored as having a moderate case overall, and on balance there are no exceptional circumstances to release this site, and Conisbrough & Denaby can get within their housing range. There are also access concerns to the site.
Comment: 40. Harworth Group’s site ref 1035 and site 040 are considered to be equivalent in this regard as both are understood to be arable fields of limited biodiversity value and without use as open space for sports, recreation or other public access. 41. However, by contrast, 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 location, it is not Green Belt and is therefore prioritised as a housing allocation. 42. 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)’. 43. 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’. 44. 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’. 45. 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. 46. A reasonable alternative which the Plan should consider 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. 47. As discussed above, site 383 is considered to serve the function of Green Belt at present (despite its allocation for housing in the preceding Plan) given that it is open land of a form and location that separates the two parts of the Conisbrough & Denaby settlement. 48. Harworth Group contends 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. 49. As site 383 and site 1035 lie adjacent to one-another, the difference in the appraisal of accessibility to schools and existing centres is considered to be negligible in real terms. It is also evident that the matter of possible unstable land at these sites is not a determining factor in whether a site should be allocated as the Council proposes allocation of site 383. Indeed, as mentioned, Harworth Group is expert at the remediation and development of former mining sites. 50. In direct comparison of environmental, biodiversity and amenity factors, site 1035 is considered to be substantially preferable to site 383. In these respects, site 1035 is considered to be equal to site 040, but substantially preferable in terms of employment development, urban form and Green Belt as discussed above.

Summary: Bio-diversity  Makes comparison in terms of Bio-diversity between 1035 (Hill Top Denaby - Rejected Housing Site) and other sites. In direct comparison of environmental, biodiversity and amenity factors, site 1035 is considered to be substantially preferable to site 383. Site 1035 is considered to be equal to site 040, but substantially preferable in terms of employment development, urban form and Green Belt. The Green Belt Review indicates that there is a stronger argument for releasing site 040 ahead of this site in Green Belt terms.

Response: Site 383 is not in the Green Belt, unlike this site, and is available, deliverable and developable, as well as long being earmarked for development. It is preferable to use non - Green Belt land ahead of considering the release of Green Belt, and this is stipulated in the NPPF. The Green Belt Review indicates that there is a stronger argument for releasing site 040 ahead of this site in Green Belt terms.
Comment:

26. The Council’s site assessment report refers to the Green Belt Review by Arup and, in particular, the Stage 3 Site Re-Appraisal. This scores the sites against the five purposes of Green Belt and provides overarching comments on the boundaries and purpose which are factored together to generate a ‘strength of case’ for inclusion in further site selection work. 27. Despite being entirely akin to Green Belt in nature and location, site 383 is not assessed as it is not Green Belt. 28. When assessed side-by-side, Harworth Group’s site 1035 scores lowest in achieving the purposes of Green Belt (i.e. least beneficial) when the individual purpose scores are summed together, as shown in the table below. Site 1035 also does not make a very strong contribution (i.e. score 5) to any particular purpose. Site: 040 Purpose Scores - 1: 1 2a: 1 2b: 5 3a: 3 3b: 4 4a: 2 4b: 1 5: 3 Total: 20 Boundary: Strong Purpose: Moderate Strength of Case: Moderately Strong Site: 826 Purpose Scores - 1: 1 2a: 3 2b: 3 3a: 4 3b: 4 4a: 2 4b: 3 5: 3 Total: 23 Boundary: Strong Purpose: Moderate Strength of Case: Moderately Strong Site: 1035 Purpose Scores - 1: 1 2a: 1 2b: 0 3a: 3 3b: 4 4a: 2 4b: 1 5: 4 Total: 19 Boundary: Mixed Purpose: Moderate Strength of Case: Moderate 29. Notwithstanding this scoring, each of the three sites is deemed to perform ‘moderately’ against the ‘local interpretation of the Green Belt purposes’. Irrespective of any particular site scores, the output of purpose is distilled to strong, moderate or weak. 30. The fact that each of the three sites is rated moderate for purpose has the effect of reducing the differentiation between the sites to the matter of boundary strength only. The output of the Council’s assessment is, that as sites 040 and 826 have strong boundary features, these sites are preferable to site 1035 which has boundary features of mixed strength. 31. The overall grade reflects this as sites 040 and 826 are deemed to have a moderately strong case for inclusion in further site selection work whereas site 1035 has only a moderate case. Indeed, the Council’s assessment (paragraph 9.1.27) confirms this to be the differentiating factor as it states: ‘Site reference 1035 is found to have a moderate case so is less preferable than sites 040 and 826 in respect to Green Belt’. 32. Sites 040 and 826 are assessed against one another and site 040 is found to be preferable. Only then is site 1035 assessed and rejected on the basis that ‘sufficient sites have been identified to meet the Town’s local need housing requirement’ and that site 826 would present a ‘more preferable Green Belt allocation’ (resulting from the assessment outlined above). 33. However, there are key deficiencies in this form of assessment and its outputs. 34. In real terms, site 040 has been selected as preferable to site 1035 simply because it is bordered on two sides by roads, which are deemed to form ‘strong boundaries’, whereas site 1035 has ‘mixed boundaries’ despite the fact that the primary boundary is a substantial mature tree belt. 35. The ‘strong boundary’ of the roads has effectively outweighed the scoring which demonstrates that site 040 is superior to site 1035 in achieving the purposes of the Green Belt. Site 040 is highly prominent, entirely unscreened by existing features and highly visible across the landscape. Allocation and development of site 040 will project the urban form of Conisbrough out into the countryside, creating a ribbon form of development. 36. By comparison, site 1035 is largely enclosed by existing features and is better related to the existing urban form of the settlement. It is not a highly prominent or projecting site and it benefits from substantial screening of the tree belt. 37. In this regard, it is considered that the somewhat crude nature of the Green Belt assessment methodology and its influence on site comparative site assessment has resulted in the inappropriate identification of site 040 rather than site 1035 for housing allocation. 38. With regard to site 383, had this been assessed as a prospective Green Belt site, then it is considered that this would be found to very strongly serve the purpose to ‘prevent neighbouring towns from merging into one another’ (purpose 2) given its location within a linear section of Green Belt between two distinct and separate areas of Denaby Main and Conisbrough. 39. Harworth Group contends that the removal of site 1035 from the Green Belt rather than site 040 and/or the deallocation and designation of site 383 as Green Belt present a reasonable alternative option that is preferable to the Council’s proposal. Accordingly, the Publication Version Local Plan does not constitute an appropriate strategy for development at Conisbrough & Denaby.

Summary:

Disagrees with the assessment of sites in the area in comparison with site 1035 (Hill Top Denaby - Rejected Housing Site). Provides an alternative assessment.

Response:

The Green Belt Review has been carried out independently using a consistent methodology. This site has been assessed twice due to a slight boundary amendment and scored as moderate in both instances. In Conisbrough, there are allocated and unallocated Green Belt housing sites which score as being less important to the Green Belt. There are not deemed to be exceptional circumstances to release this site, as set out in the Green Belt Topic Paper. There are also reservations about whether suitable access can be achieved to the site.
We wish to participate at the oral part of the examination. The Doncaster Local Plan is not sound and hence there are a number of changes required to the plan including a number of strategic and development management policies as identified in the submitted representation letter. Persimmon Homes wishes to discuss the sites at Kirk Sandall and Hatfield Woodhouse which are achievable, suitable and deliverable which could support the housing growth required in Doncaster.

Tests of Soundness:

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Comment:

This site represents a deliverable site because it is available, suitable and achievable for development. However, it has been excluded as an allocation due to the positioning of Hatfield Woodhouse in the settlement hierarchy. The settlement hierarchy identifies Hatfield Woodhouse as a defined village. In such locations, no allocations are identified and local needs are to be met within the Main Urban Area and Main Towns. Some development will be allowed with schemes of up to 20 dwellings and a cumulative level of growth of 30 dwellings allowed over the Plan Period. Any delivery in such locations will be additional to the allocated supply, and not form part of it. Hatfield Woodhouse is located less a kilometre from the centre of Hatfield which is judged to be a sustainable location for growth. Within the settlement profile evidence document the Council concludes that Hatfield-Woodhouse is closely related to the settlements of ‘Dunscroft, Dunsville, Hatfield and Stainforth’ and ‘Thorne and Moorends’ both of which have an excellent provision of services that can easily be accessed. These areas are identified as main towns and are expected to accommodate around 40% of new housing growth. As Hatfield Woodhouse is closely related to both settlements it would provide an excellent location for additional land to be allocated within a sustainable location to support the strategy of growth across the Borough. The site is located in Flood Zone 1 and is identified as being at very low risk of flooding from surface water sources. Furthermore, there are no known technical constraints which would prevent the development of the site.

Summary:

Site 119 represents a deliverable site because it is available, suitable and achievable for development. However, it has been excluded as an allocation due to the positioning of Hatfield Woodhouse in the settlement hierarchy as a defined village. Hatfield Woodhouse is located less a kilometre from the centre of Hatfield which is judged to be a sustainable location for growth. Within the settlement profile evidence document the Council concludes that Hatfield-Woodhouse is closely related to the settlements of ‘Dunscroft, Dunsville, Hatfield and Stainforth’ and ‘Thorne and Moorends’ both of which have an excellent provision of services that can easily be accessed. These areas are identified as main towns and are expected to accommodate around 40% of new housing growth. As Hatfield Woodhouse is closely related to both settlements it would provide an excellent location for additional land to be allocated within a sustainable location to support the strategy of growth across the Borough. The site is located in Flood Zone 1 and is identified as being at very low risk of flooding from surface water sources. Furthermore, there are no known technical constraints which would prevent the development of the site.

Response:

No allocations are being made in Defined Villages such as Hatfield - Woodhouse, and whilst it is close to Dunscroft, Dunsville, Hatfield and Stainforth, and Thorne and Moorends, this would likely require a car and, given that these Main Towns are sustainable in their own right, it is deemed more appropriate to direct new housing towards them instead of villages with poorer service provision.
17.1. Avant Homes have previously submitted and Advocacy Report and illustrative masterplan to support the allocation of the Land at Doncaster Road, Hatfield. This submission is reiterated here to support of Housing Site 170. Justification 17.2. Avant Homes supports the allocation of the Doncaster Road, Hatfield site. A Pre-Application has been prepared and submitted for this site which demonstrates the site’s deliverability. 17.3. Avant Homes considers the proposed housing allocation is available, suitable and achievable and is therefore in accordance with the Framework a deliverable site able to come forward in the short term. 17.4. The deliverability and benefits of the Doncaster Road, Hatfield site is as follows: Overview of Proposals 17.5. The site is located on the edge of an established residential area and benefits from easy access to the full range of services and facilities located within Hatfield. The site lies adjacent to a recent planning permission for residential development. The site is approximately 2ha gross and could accommodate in the region of 60 new homes. (SEE EMAIL FOR Aerial Photo) Deliverability 17.6. The site at Doncaster Road provides a development opportunity that is available, suitable and achievable and therefore it is considered that the site is deliverable, in accordance with national planning policy and guidance. It is promoted by Avant Homes which further demonstrates the site’s deliverability within the plan period. Availability 17.7. The land is being promoted by Avant Homes. The site is therefore available in accordance with the Framework and the National Planning Practice Guidance (PPG). 17.8. The proposed development can make an efficient and attractive use of the land. The site represents an excellent opportunity for future housing and development. This site allows housing to be delivered within an appropriate and sustainable location within Hatfield. Suitability 17.9. The site is located in a highly sustainable location and has residential development to the north, east and west and a residential planning permission exists on land to the south. The site is within easy walking distance to the centre of Hatfield with a range of facilities provided there, as well as greater facilities within Doncaster Town Centre, a bus ride away. There are a number of primary and a secondary school in the vicinity of the site. 17.10. The site is well served by buses providing opportunities for sustainable travel to work in Doncaster and beyond with access to Doncaster Railway Station. The site is also 2 miles from Hatfield Stainforth Railway Station with regular services to Doncaster, Sheffield, Hull and Scunthorpe as well as a daily service to Manchester Airport. 17.11. The development will provide additional quality development that will benefit Hatfield and the wider district with economic, environmental and social benefits. It is therefore considered that the development is suitable. Achievable 17.12. A range of technical work is being undertaken and further survey work is ongoing. From the initial assessments there are no technical issues that would prevent development or are insurmountable and a pre-application request will be submitted shortly. The site is therefore considered to be achievable and therefore deliverable in accordance with national guidance. The technical assessments will be submitted in due course and are available upon request. Effective Use of Land 17.13. Although the site is greenfield, the proposed scheme will utilise and enhance existing infrastructure. Although the site is not previously developed it is currently under-utilised. The site is easily accessible and the proposed main access is off Doncaster Road. The scheme is therefore making an efficient and effective use of land and infrastructure. Delivering a Flexible Supply of Housing 17.14. The Framework requires Local Planning Authorities to meet their full objectively assessed housing need. Avant Homes considers that the site at Doncaster Road, Hatfield is deliverable in the short term and will reinforce the housing supply and address the Borough's housing needs in the early periods of the Local Plan. The site is fully capable of being delivered in the next 5 years. A Positive Response to the Key Objectives of the Framework 17.15. The Framework sets out that the Governments key housing policy goal of boosting significantly the supply of housing and proactively driving and supporting sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs. The Framework explains that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as extensions to towns, and creating mixed and sustainable communities with good access to jobs, key services and infrastructure. Sites should also make effective use of land and existing infrastructure. 17.16. In relation to the Framework: - The proposal responds positively towards national guidance. - The site is appropriate for accommodating housing growth, being an expansion of an existing settlement. - The proposed site is accessible to existing local community facilities, infrastructure and services, including public transport. - The site has been assessed and is available, suitable and achievable for development. Benefits of Doncaster Road, Hatfield 17.17. The development of the site would provide significant benefits. The site would provide housing that would meet the needs of the Hatfield and Doncaster Borough housing market. Therefore this site provides a unique opportunity in a sustainable location. 17.18. In accordance with the Framework this representation has shown that: - The site is suitable for housing and can deliver circa 60 new homes. - The proposal will deliver high quality housing. - The proposal will deliver affordable housing. - The proposal can provide a good mix of housing commensurate to the demand and need in the area. - The scheme uses land efficiently and effectively. - The proposal is in line with planning for housing objectives. - The site is within a sustainable location situated in close proximity to facilities and services and also to bus stops for local bus routes and Hatfield-Stainforth Railway Station. - The scheme will create direct and indirect job opportunities both during and after construction. 17.19. The proposal is an appropriate site to provide for the housing needs of Hatfield and Doncaster in the short term. The allocation of the site would confirm its potential to help continue the provision of a balanced housing supply in the Borough in sustainable locations. The site can deliver a full range and mix of housing and a sustainable community. Development of the site would deliver housing and affordable housing. Doncaster needs to have a robust housing trajectory and the site Doncaster Road, Hatfield would assist with this delivery in the short term. The site is situated within a prime location suitable for residential development and as such would facilitate the development of land in a more effective and efficient manner. Development of the site would not harm or undermine the areas wider policy objectives, but seeks to reinforce the need to develop sites within sustainable
4.1. Avant Homes is supportive of Policy 6 and its allocation of the Doncaster Road, Hatfield site (Site 170). Test of Soundness 4.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is sound. Which test of soundness are comments about? X Positively Prepared X Effective X Justified X Consistency with National Policy Justification 4.3. Avant Homes supports the allocation of their site at Doncaster Road, Hatfield and its identification as a proposed housing site. Technical studies are ongoing but initial assessments demonstrate the site’s deliverability and a pre-application request will be submitted shortly. 4.4. Avant Homes considers the proposed housing allocation is available, suitable and achievable and is therefore in accordance with the Framework a deliverable site able to come forward in the short term. 4.5. The deliverability and benefits of the Doncaster Road, Hatfield are set out in Section 18 and summarised below. 4.6. The proposal is an appropriate site to provide for the housing needs of Hatfield and Doncaster in the short term. The allocation of the site would confirm its potential to help continue the provision of a balanced housing supply in the Borough in sustainable locations. The site can deliver a full range and mix of housing and a sustainable community. Development of the site would deliver housing and affordable housing. Doncaster needs to have a robust housing trajectory and the site Doncaster Road, Hatfield would assist with this delivery in the short term. The site is situated within a prime location suitable for residential development and as such would facilitate the development of land in a more effective and efficient manner. Development of the site would not harm or undermine the areas wider policy objectives, but seeks to reinforce the need to develop sites within sustainable locations as a priority. 4.7. Avant Homes supports the allocation of Site 170 consider that the Policy 6 is Sound in this regard. Proposed Change No Change

Summary:

Response:
Support welcomed
| CUSREF: | 05211 | Name: | Spawforths |
| Date: | 30/09/2019 | Organisation: | Spawforths |
| Representing: | Avant Homes Ltd |
| Comment Ref: | C/Site 170: Dev Req/05211/1/016 |
| Attend Examination: | Attend Hearing |
| Area: | Chapter 16: Spatial Proposals |
| Policy: | Main Town - Hatfield-Stainforth |

### Tests of Soundness:

- **Positively prepared**
- **Effective**
- **Consistent with national**

### Comment:

16.1. Avant Homes is supportive of Policy 6 and its allocation of Site 170, Doncaster Road, Hatfield. However Avant Homes is concerned about the justification for some of the site specific requirements set out within Appendix 2 Development Requirements Site 170. Avant Homes therefore consider that the Development Requirements are unsound. Test of Soundness 16.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified - Consistent with National Policy Justification 16.3. Avant Homes supports the allocation of the Doncaster Road, Hatfield site and its identification as a proposed housing site. A Pre-Application has been prepared and submitted for this site which demonstrates the site’s deliverability. An overview of the proposals is provided in Section 17. 16.4. The proposal is an appropriate site to provide for the housing needs of Doncaster in the short term. The allocation of the site would confirm its potential to help continue the provision of a balanced housing supply in the Borough in sustainable locations. The site can deliver a full range and mix of housing and a sustainable community. Development of the site would deliver housing and affordable housing. Doncaster needs to have a robust housing trajectory and the site at Doncaster Road, Hatfield would assist with this delivery in the short term. The site is situated within a prime location suitable for residential development and as such would facilitate the development of land in a more effective and efficient manner. Development of the site would not harm or undermine the areas wider policy objectives, but seeks to reinforce the need to develop sites within sustainable locations as a priority. 16.5. The site is available, suitable and achievable and therefore deliverable in accordance with the Framework. 16.6. Avant Homes are concerned that the Development Requirements established in appendix 2 are not sufficiently effective or justified. The extent of the setback from Doncaster Road is unclear, nor justified through the appendix. It is unclear how this set back, and requirement for open space provision to the have been reflected in the indicative capacity of the site of 72, which appears to be based on generic assumption of 40dph and a net developable area of 90%. This is not consistent with the assumptions of the viability testing, and does not appear to be consistent with the nature of the development requirements. 16.7. Avant Homes are concerned that Site 170, Doncaster Road, Hatfield, is identified in appendix 5 of the Local Plan as being within a High Value area. Therefore, there is a requirement for 23% affordable housing. The adjacent area of Hatfield and Dunsbrook is identified as being within a Low Value area, where viability has been demonstrated to be an issue through the whole plan viability report. The viability report assumes an average sales value of #2350 sqm in High Value areas, in comparison to #1700/ sqm in a low value area. Avant Homes are concerned that the identification of the site within a high value area does not reflect the sales values expected to be achieved at site 170. 16.8. Avant Homes is concerned that with all the policy requirements the local plan details, and limited refinement of value areas that this could undermine the delivery of housing through increased need for viability assessments, and the associated impact on delivery through extended negotiations. The Council should review the baseline aspirations of individual policies and the policies in combination to ensure that they are not too high and ensure that the requirements are well tested. 16.9. Avant Homes consider that the requirements in their current form are not fully justified or effective. The plan in its current form could fail to deliver sustainable development in accordance with the policies in the framework. 16.10. In these circumstances, Avant Homes do not consider the Doncaster Local Plan, in its current form, to be sound. 16.11. However, Avant Homes consider that with increased clarity, and justification for the development requirements and a review viability evidence and subsequent review of the sites capacity, the Local Plan can be found in a more effective and efficient manner. The Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 16.12. To overcome the objection and address soundness matters, the Council should: - Review the development requirements, site capacity, and whole plan viability to provide greater clarity and justification for the site requirements.

### Summary:

Support allocation of Site 170 but concerned about developer requirements. Subject to pre-applications which prove deliverability. Can deliver full range of housing including affordable units. Available, suitable and achievable. Concerned with Development Requirements established in appendix 2, that they are not sufficiently effective or justified. The extent of the setback from Doncaster Road is unclear, nor justified through the appendix. It is unclear how this set back, and requirement for open space provision to the have been reflected in the indicative capacity of the site of 72, which appears to be based on generic assumption of 40dph and a net developable area of 90%. This is not consistent with the assumptions of the viability testing, and does not appear to be consistent with the nature of the development requirements. Also concerned that the site is in a high value area and subject to 23% affordable housing requirement. Adjacent settlement in low value area. This does not reflect sales value expectations. This could undermine delivery with needs to negotiate or provide more viability assessments. Baseline requirements should be reviewed to ensure they are well tested and not too high. Requirements not justified or effective at present and the plan could fail to deliver affordable housing. The Council should review the development requirements, site capacity, and whole plan viability to provide greater clarity and justification for the site requirements.
Response:
The developer requirements are intended to help identify any constraints or design issues and requirements up front to assist in preparation of applications and are considered as being justified. Density and viability have been considered through the HELAA and Whole Plan Viability Testing.
Policy 6 is not sound as it is not positively prepared and is inconsistent with the NPPF for the reasons set out below. Plan Period The plan period runs from 2015 to 2035 however the plan period for land supply runs from 2018 and, in the case of housing only runs until 2033 (Table 5). This is an unnecessary complication and must be revised to ensure the plan period and supply period run from the same dates. Housing Trajectory The Housing Trajectory set out in Figure 3 confirms that the requirement of 920dpa will not be reached in the final 9 years of the plan period and 550dpa (Standard Method Requirement) will not be achieved for 7 years of the plan period. This will lead to significant and fundamental harmful issues with this approach as outlined below: - Fails to meet annual housing requirement - the OAN should be a minimum figure to be achieved on an annual basis - this is acknowledged within Appendix 12 of the draft Local Plan which confirms that net dwelling completions will be monitored each year against a target of 920dpa. The Council should therefore be making provision for delivery of a minimum of 920 each year throughout the plan period. The Council’s proposal to exceed 920dpa in the earlier years of the plan does not justify the significant decline in delivery proposed in later years. - Practical/Economic Implications - the differentiation between the levels of growth sought at the start of the plan period and those in the later years will have significant adverse economic impacts for Doncaster. The dramatic shift from over-provision to under-provision will lead to a significant drop in job availability within the construction industry and a significant decline in economic input from the house building industry in Doncaster in the later years of the plan. The housing delivery strategy must therefore be revised to ensure it sustains growth across the plan period and does not lead to a decline in Doncaster’s economy in the later years of the plan. Based on the position as outlined above, the strategy for delivery of housing in Doncaster is not positively prepared and fails to support growth. It is clear therefore that the delivery strategy must be revised and the Council must allocate additional sites for housing in addition to those currently proposed to ensure that a minimum annual delivery figure of 920 dwellings can be achieved every year. Delivery Rates at DN7 Unity (site ref. 418) We have significant concerns regarding delivery of housing across the plan period particularly given that delivery within the Dunscroft, Dunsville, Hatfield and Stainforth Main Town settlement across the plan period relies heavily on the DN7 Unity Site (site ref. 418). We have previously expressed concerns regarding the delivery of the DN7 initiative to Doncaster Council noting that this is a highly complex project that faces many challenges including a working colliery and spoil heap, existing landfill, a new railway station and live railway, Local Wildlife Sites (and other biodiversity value), flood risk, a network of drainage ditches, patchwork of arable fields and hedgerows and multiple ownerships. Despite these issues, the site remains identified as having a 5-year supply capacity of 175 units and up to 1,015 new homes across the plan period on the basis that "works on the new Junction 5 M18 link road are now undereway and Reserved Matters for housing [is] due imminently" (note 2 - Doncaster 5-Year Deliverable Housing Land Supply Statement (April 2018 - March 2023)). Considerable doubt remains however regarding when this project will deliver housing and how much for the following reasons: - The development has already been delayed significantly (set out originally anticipated delivery timeline). - Whilst the original outline planning permission (ref. 15/01300/OUTA) was minded to grant in 2016, a decision notice was not issued until April 2017 given issues in agreement of the S106 due to the multitude of land owners involved. - Since the granting of the original outline planning permission, a second outline planning permission has been approved on the site (ref. 18/00101/OUTM); this did not seek to increase the number of residential units or commercial floorspace approved but includes additional land to the outline planning permission. It is unclear why this additional land is needed to achieve the same amount of development. - Whilst the Council have stated that submission of Reserved Matters for housing at the Unity site is due imminently, there are no details currently available on Public Access and no evidence to suggest this is the case. Further to this, there is no information available which suggests any pre-commencement conditions relevant to the delivery of the residential elements have yet come forward. - It is acknowledged in a number of other sources that the size, infrastructure requirements and complexity of this site, delivery is likely to be a lengthy process. Such sources include: o Paragraph 52 of the Inspector’s report of Appeal Decision APP/F4410/W/16/3158500 (Land off Westminster Drive, Dunsville, Doncaster - see Attachment 1) states that: "this is a strategic extension which relies on the delivery of key infrastructure? It is a complex site in multiple ownership and will take some time for development to commence on site." o Paragraph 2.11 of the Planning Statement attached to planning application 18/00101/OUTM for the Unity development confirms: "It is accepted that Unity will come forward over a number of years. A development of this scale will take up to 20 years to complete and there will inevitably be changes to the masterplan during this period. The Unity planning consent allows a 25 year timeframe in which to submit reserved matters applications and this longevity is a fundamental requirement." (our emphasis) o Condition 1 of Decision Notice 18/00101/OUTM (second outline application at Unity) which allows applications for approval of Reserved Matters on the site to be submitted as late as April 2042. Cognisant of the above, there is clearly acknowledgement from the Council, applicant and PINS that delivery of this site is complex and will require extensive time to come forward. This is of particular concern given that, notwithstanding our position on housing requirement (set out in our response to Policy 3), whilst 3,945 units are identified as having planning permission within the Dunscroft, Dunsville, Hatfield and Stainforth Main Town settlement, 3,100 of these are within the Unity development site. Even when considering the discounted supply figure of 1,860 units set out at paragraph 16.83 (making provision for Unity units delivered after the plan period), 1,015 of these units (around 55% of the total supply in this settlement) are allocated within the Unity development site; the remainder of the sites allocated are to be delivered in the short term. With this in mind and the likelihood of further delay in its delivery during the Plan period, the Council should allocate additional housing sites within the Dunscroft, Dunsville, Hatfield and Stainforth Main Town settlement to ensure that sufficient levels of delivery are achieved in the medium term should the delivery of the Unity site be delayed. Allocations The approach contained in Policy 6 is unsound due
to a lack of justification for a number of the draft allocations. Sites with significant constraints including being located within Flood Zones 2 and 3 and without agreed mitigation or planning permission have been allocated before other sustainable sites which are not subject to such significant risks - this is contrary to the approach required by the NPPF which sets out at paragraph 155 that "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future)". (Our emphasis). The above is of particular concern given the reasons for withdrawal of the Sites and Policies Development Plan (S&PDPD) document in Doncaster (which was intended to be read in conjunction with the Core Strategy). Following the submission of the S&PDPD to the Secretary of State an Inspector conducted an Examination in Public (EIP) to assess the soundness of the DPD. It was agreed that the EIP would be undertaken in two stages with the first stage examining the Council’s methodology for identifying potential allocation and the second stage examining the proposed allocation sites. After the Stage 1 Hearing the Inspector issued a letter on the 3rd June 2014 to the Council on the soundness and legal compliance of the DPD (see Attachment 2). The Inspector’s letter recommended the withdrawal of the Plan primarily on the grounds that the S&PDPD was not sound or lawful. It was not based on an objective assessment of housing need and the site selection, site assessment and Sustainability Appraisal processes were unsound. The Inspector found that the DPD was "extremely difficult to understand" (paragraph 7) and that the process that the Council had undertaken when assessing sites for allocation was "muddled, difficult to decipher and may not have been applied in a consistent manner" (paragraph 28). The Inspector criticised the Council’s approach to considering the deliverability of sites as well as crucial factors including flood risk, Green Belt and the countryside. As a result, it did not meet the basic legal requirements of a development plan document. Cognisant of the above therefore, it is concerning that issues relating to the methodology for site assessment and allocation have not been addressed in Doncaster’s new emerging Local Plan. A review of this methodology is required and should include a revision of the draft allocations proposed to ensure allocated sites are consistent with national planning policy. Our client’s site north of Woodhouse Lane, Hatfield is entirely within Flood Zone 1. Whilst it is located within the 'Countryside' for the purposes of Policy 2, it is adjacent to the proposed Hatfield settlement boundary, abuts emerging residential allocation 970 and is well related to the existing built form. Hatfield is identified within the Dunscroft, Dunsville, Hatfield and Stainforth Main Town (a Tier 2 settlement with only the Main Urban Area of Doncaster above it). The Settlement profile confirms that this settlement ranks as one of the best performing settlements in the borough against Settlement Audit criteria - being the best provided for area in the borough outside of the Main Urban Area for primary schools. Hatfield is identified as having its own centre (with relatively low vacancy rates), a library and Hatfield Outdoor Activity Centre. The settlement has its own train station situated between Hatfield and Stainforth and is well served by buses. Hatfield therefore is a highly sustainable location for new residential development. Development of this site would not cause significant adverse harm to the settlements character, setting or appearance. It is also consistent with the requirements of emerging Policy 2 (part 5) in that: - It is consistent with the role and service function of the settlement of Dunscroft, Dunsville, Hatfield and Stainforth; - The site is well related to existing built form of the settlement and would represent a logical extension to the built-up area and is of a scale and nature that is in keeping with the core shape, form and size of the settlement; - It will not cause significant adverse harm to the settlement’s character, setting or appearance or the intrinsic character of the surrounding countryside; and - It would accord with other policies in the Local Plan. Further to the above, the site is identified within the HELAA 2018 update as suitable but with local policy constraints (site ref. 1038) however remains unallocated within the draft local plan. This is inconsistent with the approach set within the NPPF given that sites which are located in Flood Zones 2/3 and without agreed mitigation or planning permission are proposed to be allocated ahead of our client’s site. The draft allocations proposed within the Doncaster Local Plan need to be reviewed to ensure sites allocated are consistent with the approach set out within the NPPF. Policy 6 Conclusion There is a pressing need for the Council to review its housing delivery strategy and ensure that sufficient sites are allocated to achieve the required minimum of 9200pa across the plan period. It is also imperative that the sites which are proposed for allocation are in line with the approach set out within the NPPF and do not propose allocation of sites in Flood Zones 2 and 3 without agreed mitigation or planning permission ahead of other less constrained and suitable sites. Based on the above, it is noted that a review of the current draft allocations should be undertaken and additional allocations including our client’s site should be added. Our clients site north of Woodhouse Lane is a suitable and sustainable location for residential development that would significantly assist in ensuring the Council can achieve the requisite delivery rates across the plan period on a site in Flood Zone 1, on the edge of a highly sustainable settlement. Site 1038 should therefore be allocated for the development of approximately 620no. units for delivery from 2021.

Summary: Objects to Policy 6 as not sound and not positively prepared and inconsistent with NPPF. The plan period runs from 2015 to 2035 but for land supply runs from 2018 and for housing only runs to 2033 which is unnecessary complication and should be revised to run to the same dates. The Housing Trajectory confirms the 9200pa requirement will not be reached in the final 9 years of the plan period and the standard method will not be achieved for the last 7 years leading to significant and fundamental harmful issues: and, Fails to meet annual housing requirement; adverse impacts on economic growth ambitions with a dramatic shift from over provision to under provision resulting in a drop in job availability in the construction industry. It is clear therefore that the delivery strategy must be revised and the Council must allocate additional sites for housing in addition to those currently proposed to ensure that a minimum annual delivery figure of 920 dwellings can be achieved every year. Unity (Site Ref 418) is a complex scheme and has deliverability issues (multiple land ownerships, no Reserved Matters yet submitted, infrastructure requirements, the scheme’s permission includes conditions and assessment that identifies that it will take up to 20 years+ to complete, and a 25 year timeframe to submit Reserved Matters and as late as 2042) and there is an over reliance on the scheme to meet the settlements requirement. This is of particular concern given that whilst 3,945 units are identified as having planning permission within the settlement, 3,100 of these are within the Unity development site. Even when considering the discounted supply figure of 1,860 units set out at paragraph 16.83 (making provision for Unity units delivered after the plan period), 1,015 of these units (around 55% of the total supply in this settlement) are allocated within the Unity development site; the remainder of the sites allocated are to be delivered in the short term. With this in mind and the likelihood of further delay in its delivery during the Plan period, the Council should allocate additional housing sites within the settlement to ensure that sufficient levels of delivery are achieved in the medium term should the delivery of the Unity site be delayed. Allocations - The approach contained in Policy 6 is unsound due to a lack of justification for a number of the draft allocations. Sites with significant constraints including being located within Flood Zones 2 and 3 and without agreed mitigation or planning permission have been allocated before other sustainable sites which are not subject to such significant risks - this is contrary to the approach required by the NPPF and is of particular concern given the reasons for withdrawal of the Sites and Policies Development Plan. It is concerning that issues relating to the methodology for site assessment and allocation have not been addressed in Doncaster’s new emerging Local Plan. A review of this methodology is required and should include a revision of the draft allocations proposed to ensure allocated sites are consistent with national planning policy. Our client’s site north of Woodhouse Lane, Hatfield is entirely within Flood Zone 1. Whilst it is located within the ‘Countryside’ for the purposes of Policy 2, it is adjacent to the proposed Hatfield settlement boundary, abuts emerging residential allocation 970 and is well related to the existing built form. Hatfield is identified within the Dunscroft, Dunsville, Hatfield and Stainforth Main Town (a Tier 2 settlement with only the Main Urban Area of Doncaster above it).
2018 to 2033 refers to the 15 year allocated supply and the figure breakdown is set out in Table 5. Trajectory matters are discussed in the Housing Topic Paper. The Council are confident of the delivery of the Unity initiative and infrastructure is underway which will help unlock the sites potential. Even without the Unity site, or allowing for slippage, the settlement would comfortably get within it's housing range of 575 -1,085 , as it has a total of 1,720 units from permissions, and a further 108 from allocations (1,828), and a total of 875 are projected to be delivered at Unity. No new allocations are being made in flood zones, however, where permissions exist / are being developed (which will have demonstrated they pass the sequential test), these are reflected in the supply. No further sites are required in this location.

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Comment Ref: C/Policy 6: Site 170/05303/1/002
Attend Examination: Written Representation

Reason:
Area: Chapter 16: Spatial Proposals
Policy: Main Town - Hatfield-Stainforth

Tests of Soundness:

Comment:
Policy 6 'Housing allocations' sets out that Housing Allocations will help to deliver the Spatial Strategy, meet the needs for housing and support sustainable communities. The allocation of this site for residential development under policy 6 of the Publication Local Plan is supported, and the delivery of 72 dwellings on this site will help contribute to the delivery of the Borough’s Spatial Strategy. The proposed allocation of this site for residential development is supported.

Summary:
Policy 6 'Housing allocations Supportive of Policy and contribution site 170 can make.

Response:
Support welcomed
This Local Plan Representation has been prepared by DLP Planning Ltd on behalf of Avant Homes in response to the publication of the Doncaster Local Plan (Regulation 19) for consultation. This representation relates to ‘Land between Doncaster Road and Lings Lane, Hatfield’ (site ref: 170). This representation should be read alongside the formal response form that has also been completed and submitted in relation to the site.

Site and Context
The site is located to the east of Doncaster Road and to the rear of residential development along Lings Lane, Hatfield. The site is bounded by hedgerows along its perimeter and is formed of agricultural farmland. The site is flat and located within Flood Zone 1. (SEE EMAIL FOR Fig.1 - Aerial view of the site)

Proposed allocation
The site is proposed for the allocation of housing under site reference 170 ‘Land at Doncaster Road, Hatfield’ and is stated to have an indicative capacity for 72 dwellings. (SEE EMAIL FOR Fig.2 - Doncaster Publication Local Plan Policies Map Extract)

Summary:
Re site ref 170 land between Doncaster Road and Lings Lane Hatfield. o Allocated site (residential). o Supports the allocation. o Has been subject to Pre application discussions.

Response:
Noted. Support welcome.
Comment Ref: C/Summary: Site 170/05303/1/004
Attend Examination: Written Representation
Reason:
Area: Chapter 16: Spatial Proposals
Policy: Main Town - Hatfield-Stainforth
Tests of Soundness:

Comment:
The site is proposed to be allocated for residential development under site reference 170 and has been subject to pre-application discussions between Avant Homes and the Local Planning Authority. The delivery of this site will help to make a significant contribution to the delivery of homes in Hatfield and Stainforth over the plan period. There are clear intentions to deliver this site for housing by Avant Homes and its delivery will help to meet the overarching spatial strategy for the Borough. The allocation of this site for residential development is supported.

Summary:
Re Site 170 (allocated site) Supportive of the allocation of the site.

Response:
Support welcome
This site lies opposite the Mexborough Conservation Area and on the approach to the Grade II Listed Mexborough Station and Station House. We welcome the Development Requirements relating to Conservation and Heritage. These measures will help to ensure that potential developers are aware of the proximity of these assets and the opportunity the redevelopment of this area provides to enhance their significance.

Response:
Support welcomed
Comment:
The proposed development site is located to the immediate north of the Sheffield & South Yorkshire Navigation, which is managed by the Canal & River Trust. The site is supported by an existing retaining wall from the adjacent waterway. New development on site could result in additional loading upon the retaining structures here, which could increase the risk of collapse towards the canal. Whilst there are opportunities for any risk to be appropriately mitigated, we believe that there should be additional text within the ‘Design’ section of the associated text to make it apparent to decision makers (and developers) that any final layout is designed to ensure that any risk of land instability towards the canal is addressed. Without this being taken into account, there are risks that the impact of development on land stability may not be fully considered and addressed. This would make the local plan less effective in accordance with the aims of paragraphs 170 (part e) and 178 of the National Planning Policy Framework (NPPF), which require planning policies to take into account ground conditions and any risks from land instability. In addition to the above, there are potential heritage assets on site (including visible elements) which, although not listed, do have historic value and enhance the character and appearance of the existing waterway corridor. We believe that redevelopment of the site should consider the heritage value of these assets (any remaining buildings), and opportunities to set out a positive strategy for the conservation of heritage assets in accordance with the aims of paragraph 185 of the NPPF. The Trust do welcome consideration in the proposed text towards aims to enhance biodiversity, and for development to respond to the canal frontage; which would help ensure that the development accords with the aims of the NPPF and emerging policy. PROPOSED CHANGE Measures to address risks of Land Instability: We advise that the ‘Design’ criteria for the site should include a statement informing decision makers of the risk of land instability, and the need for the final design to incorporate measures to limit any risk of land instability on site. Suggested text is below. “The site is supported above the canal by existing retaining structure. The final design and layout shall incorporate measures to prevent any increase in risk to land instability caused by loading onto any existing or new retaining structures on site.” This change would make it apparent to decision makers about the risk of land instability, and measures to control the risk; which would help ensure that the aims of paragraphs 170 and 183 are fully met. Measures to address Heritage Matters: We advise that additional text is included in the heritage section to advise that the applicant should describe and assess the significance of the existing building on site, including any contribution made by its setting and the potential for the retention of the building on site. This would help ensure that any future application and assessment accord with the aims of paragraphs 186 and 190 of the NPPF, and allow decision makers to fully assess the impact of the proposal on the heritage asset.

Summary:
The development requirements for Site 155 should be amended as follows: Design: “The site is supported above the canal by existing retaining structure. The final design and layout shall incorporate measures to prevent any increase in risk to land instability caused by loading onto any existing or new retaining structures on site.” Heritage: Include additional text to advise that the applicant should describe and assess the significance of the existing building on site, including any contribution made by its setting and the potential for the retention of the building on site.

Response:
Comments noted. The design requirements will be updated accordingly with the suggestion. On heritage comments, there is only a small remnant of a building on site that was once part of a building that would have been of local interest - however what now remains is not. These will therefore not be amended.
Comment:
We as a farming family are very happy land 139 to the north of Wath rd Mexborough has been removed from the local plan. Agricultural land now is becoming very hard to find especially when it is grade 3a prime growing land and its on our doorstep, to loose this land to development would be a big loss not only for us but other farmers alike. Land like this in the future could come up for sale and we would look to purchase it for future growth and expansion and to build our profits for sustainability. We are relieved this land has been removed and would like it to remain that way in the future, we can now concentrate on our business without worrying about a major development effecting our business which has took years to develop. As small farmers the availability of this land is crucial in our future growth as agricultural land is becoming less and less and their is no more so it needs saving now before it’s too late. Could you please keep me informed of any development plans around me to do with agricultural land.

Summary:
Re site 139 - land North of Wath Road Mexborough. o Rejected housing site (previously proposed for allocation in 2018 consultation) o Support removal of site from proposed allocations. o Should be kept as agricultural land. o Agricultural land is increasingly in short supply.

Response:
Support for this site being rejected is noted.
C/Conclusion: Site 139/05256/1/008

Attend Hearing 985 which, although provides for the full local need target, "goes little towards providing the economic-growth led housing for one of the largest Main Towns outside of Doncaster.' The west urban extension site allows for an urban extension in a highly sustainable area which is of low flood risk. We strongly recommend Site 139, land north of Wath Road, Mexborough, be released from the Green Belt and be included as a housing allocation for 400 units. This in turn will assist in Doncaster delivering its required housing target for Mexborough. Benefits of Site 139 as a housing allocation: - Allows Mexborough to meet their housing target as identified in Core Strategy without exporting part of the requirement to Doncaster Main Urban Area. - Residential development in a sustainable location - Provision of circa 400 homes with a portion of affordable housing - Maintain the distance between settlements through design - Retention of the core shape and form of the settlement - An urban extension that would not significantly harm the character and appearance of the surrounding countryside or the rural setting of the settlement - Exceptional circumstances have been demonstrated - Urban extension consistent with national policy - Deliverable within the Plan Period - Economic Growth Led Housing Available. The site is within sole family ownership. Terms have been agreed between the owners and Countryside Properties to continue promoting the land for residential uses. Suitable. The emerging Local Plan requires additional housing in Mexborough. Mexborough currently has a shortfall in quantum allocated and is a settlement that is recognized to be constrained. Site 139 as a residential allocation offers a sustainable urban extension location within Mexborough that would bring in line the allocation numbers with the Core Strategy. Deliverable. The site is deliverable in the short, medium and long term. Countryside Properties have agreed an option agreement on the land should the land be allocated for residential development; the site would come forward within the plan period as demonstrated below. Plan Period: Years 1-5 Houses Delivered: 100 Plan Period: Years 6-10 Houses Delivered: 150 Plan Period: Years 11-15 Houses Delivered: 150 Plan Period: Total Houses Delivered: 400. The site is considered to provide a solution to the acuteness and intensity of housing that is required in Doncaster, Mexborough specifically in this instance. There are constraints on the supply and availability of other land whereas Site 139 has clearly been shown to be available, deliverable and suitable. The site should be released from the Green Belt, as it has been demonstrated that through design, there is no further coalescence of settlements. The delivery of 400 houses, which will include a proportion of affordable housing will assist in driving the economic led housing within Mexborough in a highly sustainable location. For the Local plan to meet its aims and objectives, a sufficient amount of housing needs to be allocated to Mexborough. This should be achieved by the removal of Site 139 from the Green Belt. Moreover, the site should be a Housing Allocation, which will support the Council in meeting its aims and objectives. In respect of the alternatives; "There is a complete lack of landowner representations for any land to the north of Mexborough, so deliverability of a northern extension cannot be justified which only leaves the western urban extension option. Given the site performs well through sustainability appraisal, and mitigation identified for any negative effects, on balance it is considered the benefits of allocating the site as a sustainable urban extension to one of the borough's largest Main Towns outweighs the Green Belt Review Phase 3 findings and exceptional circumstances can be demonstrated."

Summary: Not enough housing allocated to Mexborough. Allocate site 139 - remove from Greenbelt.

Response: Mexborough is the only Main Town which cannot get within its housing target range. However, as set out in the Green Belt Topic Paper, the settlement is constrained by the HS2 safeguarding route, physical infrastructure and the borough boundary, as well as Green Belt, which in this location separates Doncaster from neighbouring Barnsley and Rotherham. Site 139 was assessed in the Green Belt Topic Paper and found to be a strongly performing piece of Green Belt with a weak case for continuation in the site selection process. As set out in the Green Belt Topic Paper, it is felt that exceptional circumstances do not exist to justify the release of this site. The site selection methodology shows that all available urban / brownfield land has been allocated in this settlement.
The housing allocations are shown in Table H1(F): Allocations with planning permission (as at 1st April 2018), Table H2(F): Allocations without planning permission (as at 1st April 2018), and Table H3(C): Reserve Development Sites. The proposed allocated total results in a minimum shortfall of housing between 5 and of 515 dwellings. This is based on all the sites listed within the tables delivering their full quantum of housing. It is clearly evident that the allocations in the Plan for Mexborough are not positively prepared, justified, effective or consistent with national policy and thus, not sound. In accordance with national Policy when identifying land for homes, policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. The Local plan as it stands does not achieve this in Mexborough. The inclusion of Site 139 would assist in making the plan sound in relation to Mexborough as demonstrated in the table below, the inclusion of Site 139 would result in the allocated housing numbers meeting both the Core Strategy Requirement, and the Local plan requirement. Settlement: Mexborough Local Plan target: 475 - 985 Allocations with planning permission (as at 1st April 2018): 268 Allocations without planning permission (as at 1st April 2018): 202 + 400  602 Allocated Total: 870 Shortfall/Surplus: 870 (+395 or -115)

Identifying land for homes The NPPF states at paragraph 67 that Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of: a) specific, deliverable sites for years 1-5 of the plan period; and b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan. The consultation undertook by Doncaster Council in October 2018 when proposing housing sites, in reference to Site 139 which was at the time a proposed housing site, stated: “Although land to the south-west is not at risk of flooding, this is the edge of the DMBC borough boundary and beyond it lays a large area of employment uses at Swinton (Rotherham MBC). There is a complete lack of landowner representations for any land to the north of Mexborough, so deliverability of a northern extension cannot be justified which only leaves the western urban extension option. Given the site performs well through sustainability appraisal, and mitigation identified for any negative effects, on balance it is considered the benefits of allocating the site as a sustainable urban extension to one of the borough’s largest Main Towns outweighs the Green Belt Review Phase 3 findings and exceptional circumstances can be demonstrated.” As the Council have acknowledged previously, this site offers a very suitable, deliverable and available urban extension for Mexborough. The inclusion of the site as a Housing Allocation would significantly assist Doncaster in housing delivery throughout the plan period. Safeguarded Sites in Mexborough There are a number of urban sites (mainly in the Doncaster Main Urban Area and Mexborough) where deliverability issues (mainly associated with addressing flood risk mitigation and/or directly impacted by the safeguarding route of HS2 and unstable land) have prevented them coming forward and where their development in the plan period cannot at this time be demonstrated. Site 154 is an example of where deliverability, suitability and availability are all seriously questioned. Whereas, Site 139 has demonstrated that it can come forward and deliver housing in an area that is otherwise constrained. There are three reserve development sites within Mexborough that have an indicative capacity of 242 dwellings. The inclusion of the proposed reserved development sites over the inclusion of Site 139 is not considered to be sound. Site 139 significantly outscores site 154 in the Sustainability Appraisal undertaken by the Council. When applying a scoring system of -2 to 2 relative to - ++, Site 154 was the most unsustainable site within Mexborough. The sustainability of the site is positively highlighted within the Councils Sustainability Appraisal. Site 139 scores higher than 154 in the following areas: - Distance to bus stops - Distance to cycle network - Access to secondary school - Access to GP surgery - Not being located on unstable land - Fibre broadband coverage - Biodiversity The comparison of sustainability of the two sites is appended to this representation. (SEE EMAIL FOR APPENDICES) Paragraph 72 of the NPPF states 'The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.' The NPPF then goes on to list criterion that such developments should meet: a) consider the opportunities presented by existing or planned investment in the area’s economic potential and the scope for net environmental gains; b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access; c) set clear expectations for the quality of the development and how this is maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided; d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size. It is considered that the allocation for residential development on Site 139 would align with the NPPF and achieve a well located and designed urban extension to Mexborough that is deliverable, sustainable and suitable. As current, the Publication Local Plan housing allocations within Mexborough, does not meet any of the following criteria is therefore not sound: Positively prepared - providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as...
Summary:

Policy 6 Housing Allocation. 1. There is a shortfall in Mexborough of between 5 and 515 dwellings. 2. Settlement allocation of 470 against a target of 475-985 does not provide for economic growth of one of the biggest Main Towns outside the Main Urban Area. 3. Including site 139 would meet both Core Strategy requirement and Local Plan requirement. Safeguarded sites in Mexborough o Site 154 - deliverability, suitability and availability is questionable. 3 reserve sites in Mexborough o Including these over site 139 is not considered to be sound. Sustainability Appraisal 1. In the SA (when applying numerical values) site 139 scores better than site 154. 2. Site 139 would help plan conform to NPPF para.72. Local Plan is not sound. 1. Is not positively prepared, suitable, effective or consistent with national policy. 2. Text is provided to support this argument but is difficult to understand.

Response:

All evidence should be read in conjunction with each other. The Core Strategy is irrelevant to this plan. There is a shortfall against the Local Plan target in Mexborough, however this is offset by over delivery in other Main Towns / the Main Urban Area, and due to the ranges ultimately evens out. The reason for the shortfall is a lack of viable sites, due to reasons such as the HS2 safeguarding route, physical infrastructure barriers and the Green Belt. In this case, the Green Belt Review assessed site 139 as being a strongly performing piece of Green Belt, and therefore on balance it was decided exceptional circumstances could not be justified in this case to release the site. More information is available in the Green Belt Review / Topic Paper and Site Selection Methodology. Reserve sites have not been included at the expense of this site, and only the non-Green Belt part of site 154 is listed as a Reserve Site (currently unavailable due to HS2 safeguarding).
Countryside Properties have agreed an option on the site. It would come with the provision of circa 400 homes with a portion of affordable housing. The site is deliverable within the Plan period. Countryside Properties have agreed an option agreement on the land for residential uses. Terms have been agreed between the owners and Countryside Properties to continue promoting the land for residential uses. Suitable The emerging Local Plan requires additional housing in Mexborough. Mexborough currently has a shortfall in housing needs to be allocated to the site. It has been shown to be deliverable in the short, medium and long term. Countryside Properties have agreed an option agreement on the land for residential development; the site would come forward within the plan period as demonstrated below. Plan Period: Years 1-5 Houses Delivered: 100 Plan Period: Years 6-10 Houses Delivered: 150 Plan Period: Years 11-15 Houses Delivered: 150 Plan Period: Total Houses Delivered: 400 The site is considered to provide a solution to the acuteness and intensity of housing that is required in Doncaster, Mexborough specifically in this instance. There are constraints on the supply and availability of other land whereas Site 139 has clearly been shown to be available, deliverable and suitable. The site should be released from the Green Belt, as it has been demonstrated that through design, there is no further coalescence of settlements. The delivery of 400 houses, which will include a proportion of affordable housing will assist in driving the economic housing within Mexborough in a highly sustainable location. For the Local plan to meet its aims and objectives, a sufficient amount of housing needs to be allocated to Mexborough. This should be achieved by the removal of Site 139 from the Green Belt. Moreover, the site should be a Housing Allocation, which will support the Council in meeting its aims and objectives. In respect of alternatives; “There is a complete lack of landowner representations for any land to the north of Mexborough, so deliverability of a northern extension cannot be justified which only leaves the western urban extension option. Given the site performs well through sustainability appraisal, and mitigation identified for any negative effects, on balance it is considered the benefits of allocating the site as a sustainable urban extension to one of the borough’s largest Main Towns outweighs the Green Belt Review Phase 3 findings and exceptional circumstances can be demonstrated.” Doncaster Local Plan, Draft Policies & Proposed Sites (2018)
Land North of Wath Road, Mexborough (Site 139) proposes a Western Urban Extension to Mexborough and is considered to provide a solution to the acuteness and intensity of housing that is required in Doncaster, Mexborough specifically in this instance. There are constraints on the supply and availability of other land in the settlement, whereas Site 139 has clearly been shown to be available, deliverable and suitable to deliver 400 homes. The site would be brought forward in two phases. Phase 1 would be the northern section of the site (250 dwellings), and Phase 2, the southern portion of the site (150 dwellings). The site should be released from the Green Belt, as it has been demonstrated that through design, there is no further coalescence of settlements and exceptional circumstances demonstrated. The delivery of 400 houses, which will include a proportion of affordable housing will assist in driving the economic led housing within Mexborough in a highly sustainable location. For the Local plan to meet its aims and objectives, a sufficient amount of housing needs to be allocated to Mexborough. This should be achieved by the removal of Site 139 from the Green belt. Moreover, the site should be a Housing Allocation, which will support the Council in meeting its aims and objectives. In respect of the alternatives; “There is a complete lack of landowner representations for any land to the north of Mexborough, so deliverability of a northern extension cannot be justified which only leaves the western urban extension option. Given the site performs well through sustainability appraisal, and mitigation identified for any negative effects, on balance it is considered the benefits of allocating the site as a sustainable urban extension to one of the borough’s largest Main Towns outweighs the Green Belt Review Phase 3 findings and exceptional circumstances can be demonstrated.” Source: Doncaster Draft Policies & Proposed Sites (2018)
An assessment of Site 139 against the five Green belt Criteria is as below: a) to check the unrestricted sprawl of large built-up areas; The site does not result in unrestricted sprawl of a large built up area. As noted within the Green Belt Review undertaken by Doncaster Council, the site is not considered to have a role in checking the unrestricted sprawl of a Large Built Up Area. The site meets this criterion. b) to prevent neighbouring towns merging into one another; The approach that would be taken, as demonstrated on the attached plan, is the built form of the proposed site and the existing built form will be no closer than currently exists. The site will not negatively impact on the visual or physical gap that currently exists. Nor would it result in the reduction of perceived separation between settlements. An existing physical and visual gap already exists due to the change in topography and the levels that exist between the two areas. The nearby settlement of Wath upon Dearne is situated 1.6km away. However, the built form of the commercial and industrial area extends towards Mexborough. The built form of the industrial area is currently just 240 metres from the existing built form. This would be maintained, and the Green Belt boundary could be well defined through the design of the development and the advanced planting that is currently being undertaken. c) to assist in safeguarding the countryside from encroachment; The area is characterised by residential to the east, Adwick Business Park to the south and south west and countryside to the north and west. The site would not negatively impact on the wetland structure. Development in this location would not have a negative impact on the physical landform as it would look to retain the settlement shape and would be designed in a manner to not have an adverse effect upon the landscape therefore the site meets this criterion. d) to preserve the setting and special character of historic towns; and The proposed site does not influence the preservation of the setting and special character of historic towns. Therefore, the site meets this criterion and there is no conflict. e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The site has a moderate role in encouraging the recycling of derelict and other urban land. The opportunity to recycle derelict land in Mexborough has been included within the Plan as safeguarded land. The safeguarded land is safeguarded in relation to HS2. The housing requirement of Mexborough requires more land than that is available through only derelict sites. Moreover, the constraints of Mexborough further restrict this. The site should be released from the Green Belt as it is required to meet the housing requirements for Mexborough as exceptional circumstances can be demonstrated as stated in the Councils Doncaster Local Plan Site Selection Methodology Part 3.

Response:
The Arup Green Belt Review is an impartial assessment of the borough's Green Belt. It finds this site to be a strongly performing area of Green Belt with a weak case for continuation in the site selection process. The Council are satisfied with the assessment and feel that, after consideration, there are no exceptional circumstances to release any Green Belt in Mexborough, even though the settlement will fall short of its housing target. The Green Belt Topic Paper explains this further.
Comment:

These representations are in response to the Doncaster Local Plan 2015-2035 Publication Version on behalf of Mr & Mrs Hardy. The consultation is between August and 30th September 2019. This representation is regarding the Land off Wath Road, Mexborough (site Reference 139). The site is referred to as Site 139 throughout this report. A site plan is attached to this representation. Site and Surroundings The site is an irregularly shaped agricultural field to the west of Mexborough contained by a well-defined western boundary. The site has an undulating topography. To the north of the site is open countryside and Lousy Busk Lane (a track); to the east is Mexborough Highwoods Primary School and Mexborough School, as well residential properties along Manvers Road and Highwoods Road. To the south-east of the site there is Mexborough West junction, Manvers Road Playground, Wath Road Skate Park, and a public footpath which connects the existing neighbourhood to the A6023, Wath Road. To the west there is a railway line and beyond that there is a Business Park and Dearne Valley College. Mexborough and its surrounding settlements (Wath upon Dearne, Swinton and Adwick upon Dearne) have a combination of visual or physical gaps that currently exist and perceived separations between the settlements. These are accomplished in different ways, whether it be the green field physical gap between Mexborough and Adwick upon Dearne or the differing levels created by the topography and transport links with Wath upon Dearne and Swinton. Timeline of allocations Stage: Call for Sites Date: December 2014 Status: Submitted as an available site for housing Stage: Local Plan Consultation - Draft Policies and Proposed Sites Date: September/October 2018 Status: Proposed Housing Site (418 dwellings) Stage: Local Plan Consultation - Publication Draft Policies and Proposed Sites Date: August/September 2019 Status: Green Belt This representation is to promote Site 139 (Land to the north of Wath Road) for Residential development and a housing allocation in the Doncaster local Plan 2015-2035. This representation is set out in the following structure: - Comments on Policy 2, 3 and 6 of the Local Plan publication Draft - Green Belt Assessment - Conclusion Appendix 1 - Indicative Layout plan Appendix 2 - Comparative Sustainability Assessment Appendix 3 - Extract from Local Plan Consultation - Draft Policies and Proposed Sites Appendix 4 - Previous Representations submitted. (SEE EMAIL FOR APPENDICES)

Summary:

Brief overview of the site and its promotion history.

Response:

Site details noted.
As shown in Figure 2, the sites are proposed to be allocated for housing within the Publication Local Plan under site reference: 927 'Land On The North West Side Of Pastures Road, Mexborough' and 678 'Land Off Pastures Road, Mexborough'. Policy 6 of the Local Plan identifies both sites as sites with planning permission as of 1st April 2018 and that these sites will help deliver the housing requirement. The allocation of this site for residential development under Policy 6 of the Publication Local Plan is supported. (SEE EMAIL FOR Figure 2: Doncaster Publication Local Plan Policies Map Extract)

Summary:
Policy 6. Supportive of allocation of sites 678/927 and contribution to Policy objectives.

Response:
Support noted. The sites in question have permission, and the units remaining reflect the situation as at April 2018.
Comment:
This Local Plan Representation has been prepared by DLP Planning on behalf of Avant Homes in response to the publication of the Doncaster Local Plan (Regulation 19) for consultation. This representation relates to land at Pastures Road, Mexborough. This representation should be read alongside the formal response form that has also been completed and submitted in relation to the site. Site and Context  The site comprises approximately 16ha of land located within the settlement of Mexborough, to the south east of the main urban area of Doncaster (see Figure 1). (SEE EMAIL FOR Figure 1: Aerial view of the site) The area surrounding the wider site is characterised by a mix of land uses including employment, agricultural and open space. To the south of Pastures Road is the Pastures Lodge Hotel and Restaurant and open storage uses. Outline planning permission was received in 2010 for the development of the site comprising residential units, open space and B1 office development. Subsequent reserved matters applications have been approved for the residential elements of the site which have now been built out.

Summary:
Re sites 678 & 927 Pastures Road Mexborough (allocated - residential)  o Object to figures in Table H1 (f) 'Allocations with Planning Permission' in Local Plan document  o Site 678 - remaining capacity shown as 5. Site now built out.  o Site 927 - remaining capacity shown as 37. Site now built out.  o Recommend table H1 (f) is amended to reflect current position.

Response:
The capacities are as at April 2018, however the additional build out / site completions are noted. The 2019 RLA provides an updates on housing permissions and completions.
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**Comment:**

The site is partially allocated as housing with planning permission under references 927 and 678. The rest of the site is allocated as a Residential Policy Area. The delivery of this site will help contribute to the housing provision for Mexborough. The allocation of this site for residential development is therefore supported, however we object to the number of units that have been identified as remaining to be built and have made recommendation for amendments in order to ensure that the plan is effective and sound.

**Summary:**

Allocation of sites supported. Object to the number of units that have been identified as remaining to be built and have made recommendation for amendments in order to ensure that the plan is effective and sound. (see previous comment summary for detail)

**Response:**

Support welcome. The information on units built has been updated in the 2019 RLA.
Table H1(F) of the Draft Plan states that site 678 has permission for 55 units with 5 units remaining. We object to this capacity as the 5 remaining units have now been built out. Recommendation It is requested that this figure in Table H1(F) is amended to accord with the current permission.

Table H1(F) also states that site 927 has permission for 147 units with 37 units remaining. We object to this capacity as the 37 remaining units have now been built out. Recommendation It is requested that this figure in Table H1(F) is amended to accord with the current permission.

Response:
The capacities are as at April 2018, however the additional build out / site completions are noted. The 2019 RLA provides an updates on housing permissions and completions.
| Tests of Soundness: | Justified |

As shown in Figure 2, the sites are proposed to be allocated for housing within the Publication Local Plan under site reference: 927 'Land On The North West Side Of Pastures Road, Mexborough' and 678 'Land Off Pastures Road, Mexborough'. Policy 6 of the Local Plan identifies both sites as sites with planning permission as of 1st April 2018 and that these sites will help deliver the housing requirement. The allocation of this site for residential development under Policy 6 of the Publication Local Plan is supported. (SEE EMAIL FOR Figure 2: Doncaster Publication Local Plan Policies Map Extract)

**Summary:**

**Response:**
Support noted. The sites in question have planning permission. The figures reflect the number of units built / remaining as at April 2018.
Tests of Soundness:

Comment:
This Local Plan Representation has been prepared by DLP Planning on behalf of Avant Homes in response to the publication of the Doncaster Local Plan (Regulation 19) for consultation. This representation relates to land at Pastures Road, Mexborough. This representation should be read alongside the formal response form that has also been completed and submitted in relation to the site. Site and Context The site comprises approximately 16ha of land located within the settlement of Mexborough, to the south east of the main urban area of Doncaster (see Figure 1).

(SEE EMAIL FOR Figure 1: Aerial view of the site) The area surrounding the wider site is characterised by a mix of land uses including employment, agricultural and open space. To the south of Pastures Road is the Pastures Lodge Hotel and Restaurant and open storage uses. Outline planning permission was received in 2010 for the development of the site comprising residential units, open space and B1 office development. Subsequent reserved matters applications have been approved for the residential elements of the site which have now been built out.

Summary:
Re sites 678 & 927 Pastures Road Mexborough (allocated - residential)   Supports allocation of sites.

Response:
Support welcome
The site is partially allocated as housing with planning permission under references 927 and 678. The rest of the site is allocated as a Residential Policy Area. The delivery of this site will help contribute to the housing provision for Mexborough. The allocation of this site for residential development is therefore supported, however we object to the number of units that have been identified as remaining to be built and have made recommendation for amendments in order to ensure that the plan is effective and sound.

Summary:
Re sites 678 & 927 (allocated sites) Supportive of allocation and contribution to housing requirement in Mexborough.

Response:
Support welcome
Comment Ref: C/Table H1: 927/05305/1/003
Attend Examination: Written Representation

Reason:
Area: Chapter 16: Spatial Proposals
Policy: Main Town - Mexborough

Tests of Soundness:
Justified

Comment:
Table H1(F) of the Draft Plan states that site 678 has permission for 55 units with 5 units remaining. We object to this capacity as the 5 remaining units have now been built out. Recommendation It is requested that this figure in Table H1(F) is amended to accord with the current permission.
Table H1(F) also states that site 927 has permission for 147 units with 37 units remaining. We object to this capacity as the 37 remaining units have now been built out. Recommendation It is requested that this figure in Table H1(F) is amended to accord with the current permission.

Response:
The capacities are as at April 2018, however the additional build out / site completions are noted. The 2019 RLA provides an updates on housing permissions and completions.
1.0 Mr George wishes to record his objections to the Draft Local Plan because the 0.9ha of land the subject of the representation has not been allocated for residential development. In support of this representation Mr George also includes previous submissions made on his behalf in the period leading up to the publication of the draft plan. 1.1 When Site 123 was assessed against multiple SA objectives/criteria it was nominally in competition with several other sites and the assessment graded sites according to their positive, neutral and negative effects. 1.2 One of the sites ref: 662 was identified as having significant negative effects because of the unstable nature of the ground. However this very large site (the former colliery) already had planning permission so the assessment was rather pointless and therefore was always going to be loaded against the merits of other sites in relation to meeting the need for housing. 1.3 Notwithstanding the Draft Plan goes on to allocate immediately to the south of site 662 a further area of unstable land ref: 247 also located within the Green Belt. 1.4 Taking the SA assessment at face value sites 123 and 247 have very similar merits. Where site 123 appears to fail is in relation to flood risk and archaeology. 1.5 In fact site 123 (0.9ha) is not subject to flood risk. 1.6 Neither is it a site in which there is any but routine archaeological interest whatsoever. The potential archaeological concern is believed to be associated with the old Roman Road (formerly the A1) and the site of a Roman Fort. 1.7 The route of the old road is known to be approximately 1km to the east of the site and the Fort is now known to be beneath the Park and Ride facility some 600m northeast. 1.8 Mr George believes that the misconceived assessment was in fact carried out for a larger site (later reduced in size to the current site) in relation to which representations were made at the outset of this Local Plan and its predecessor. 1.9 The attached copy document (my Document 1) from August 2012 "Where should new housing in Rossington go?" associated with the preparation of the preceding but aborted Local plan shows how the analysis and approach to this current site has not changed despite the very significant reduction in site area. 1.10 So much so that by referring to a much more recent but similarly entitled document (my Document 2) of September 2018 Site 123 doesn't feature at all in the text. Although the current site is only a part of the identified site on the small scale plan, it would seem the site is so insignificant as to not merit any attention. 1.11 BUT NOT SO SITE 247. 1.12 In September 2018 Site 247 as my Document 2 shows was clearly rejected as a possible housing site for several reasons - the document making it clear that not all the reasons related to the output from the permitted former colliery site. 1.13 Mr George is entitled to ask what has changed in such a short timescale? 1.14 Site 123 is easily deliverable both now and for the duration of the Local Plan and being clearly sustainable meets square on with National Policy and will assist in meeting local demand in the very likely event that the former colliery site will not deliver the number of dwellings anticipated. 1.15 Site 123 is more sustainable than site 247 albeit smaller in area. It is less detached from the remainder of the settlement and future residents can use public transport or easily walk to the existing Park and Ride facility. 1.16 When taking a broader view of housing land allocation to the south-east of Doncaster there is very little choice available for future residents but also for the smaller builder. This is disappointing that the Draft Plan should continue to perpetuate the favourable treatment of the volume builder and volume landholder especially given the economic stimulus provided by the nearby Airport, iPport and projected European Tour Golf Course. 1.17 Paragraph 16.129 of the policy text of the Draft Plan shows clearly that there continues to be doubt as to the contribution the former colliery site will make to housing need over the plan period. What has been developed so far hasn't hit expected targets and as a result of this shortfall further land has been allocated to the south in the Green Belt. That hardly seems to be a fair and balanced approach. 1.18 It follows from the above that Mr George objects to the settlement development limit for this part of Rossington but he also wishes to point out that the proposal for developing his site nevertheless remains consistent with Draft Policy2 (S)-proposed development adjacent to a Development Limit. 1.19 In order to rectify what Mr George sees as the defects in the Local plan he asks that his site is formally allocated for residential development. He also asks that the local plan is amended to make a clear statement that the Planning Authority will support all reasonable and sustainable proposals submitted by the small builder that meet with the objectives of the Local Plan. (SEE EMAIL FOR DOCUMENT 1 AND 2)

Summary:
Object to the Local Plan, which fails to allocate site 123. When assessed against the SA criteria, site 123 an 247 (area of unstable land in the Green Belt to the south of Rossington colliery) have similar merits. However, site 123 falls down on archaeology and flood risk. The site is not subject to flood risk, and the archeological concern referred to appears to be related to the old Roman Road and an old Roman fort - 1km and 600m away (and beneath a Park & Ride) respectively. The promoter believes the assessment was carried out on a larger site to what is currently proposed. It is still the same outcome as the assessment of the much larger site which was carried out for the previous Local Plan. The settlement summary (maps) in September 2018 does not feature at all in the text. It would appear the site is so insignificant it does not warrant attention. However, in 2018, site 247 was clearly rejected as a housing option for several reasons. The owner of Site 123 is entitled to know what has changed in such a short amount of time? Site 123 is deliverable, sustainable and fully complies with National Policy - and will assist in meeting local demand in the likely event that the former colliery site does not deliver all the proposed dwellings. 123 is more sustainable that 247 and is less detached from the remainder of the settlement. Future residents can use public transport or access the park and ride. In south - east Doncaster there is little choice for both future residents and smaller builders. It is disappointing the Local Plan favours volume builders, especially given the economic stimulus provided by the airport and PGA golf course. There is clear evidence (including current deliver and para. 16.129 of the policy text) which shows that there are doubts about what the colliery can contribute towards housing need in the plan period. Therefore,
there is an objection to the site. The proposal also remains consistent with draft policy 2 (5) - proposed development adjacent to a development limit. The site should be allocated, and the Local Plan should be amended to make a clear statement that the Planning Authority will support reasonable and sustainable proposals submitted by small builders which meet the objectives of the Local Plan.

Response:
An amended site boundary for this site has been considered (1040), however there are still flood risk concerns, and furthermore, as Rossington can meet and surpass its housing targets via permissions and urban sites, there is no need to release land in the countryside for development. Housing at Rossington Colliery is being delivered and sites 662 and 247 will deliver a significant amount of housing - the Council are confident in the delivery of this.
1. RHI object that their site, Land at the South of Grange Road has not been allocated for housing. The land south of Grange Road, Rossington (Figure 1 below), identified as Site No 306 in the Council's Site Assessment Report, would represent a sustainable urban extension in a location that is not at risk of flooding and is close to shops, community facilities as well as existing and future employment opportunities. The Councils' own Site Assessment Report confirms that the only constraint to housing development on this site is a policy constraint i.e. its Green Belt status. Unlike most other sites considered no other factors are identified would prevent development. (SEE EMAIL FOR Figure 1 Land South of Grange Rd, Rossington - Site 306) 2. The assessment below demonstrates that the inclusion of this site in the Green Belt can no longer justified, if indeed it ever was in the first place. Changes in local circumstances, in particular the development of iPort and the land raising and the creation of parkland on the Rossington Grange Farm land to the west, (see Figure 2 overleaf) means Site 306 does not need to be kept permanently open to achieve any of the five purposes for including land in the Green Belt. On this basis, the Local Plan is not compliant with national policy. RHI object to this site remaining within the Green Belt and consider that is should be allocated for housing. 3. Paragraph 134 of the NPPF states that there are five purposes for including land within the Green Belt: a) to check the unrestricted sprawl of large built-up areas; As the land South of Grange Road is being promoted for development through the Development Plan process its subsequent development could not be categorised as 'unrestricted sprawl' but would represent a planned expansion of the urban area that is both proportionate and necessary to address the anticipated development needs of Rossington and the Borough as a whole, both within and beyond the plan period. As a result, the Green Belt 'purpose' is not relevant in such circumstances. b) to prevent neighbouring towns merging into one another; The Land South of Grange Road lies on the south western edge of New Rossington, with the nearest town being 3km to the west (Wadworth). It is however important to note that the character of the gap between these two settlements has changed significantly in the last couple of years and is due to change even more in the future following the completion of the iPort development and development at Torne Park. Collectively these developments have already significantly reduced the gap between the built-up areas of Rossington and Wadworth (as shown at Figure 2 below). Any development on land South of Grange Road will lie well to the east of these new developments and as a result have no practical impact on the extent or perception of separation. It is also noted that the site does not extend any further south that the existing southern limit of the built-up area of New Rossington. As a result, development on the land south of Grange Road would not result in any merging of neighbouring towns into one another. As a result, the land south of Grange Road does not need to be allocated as Green Belt or retained to prevent neighbouring town merging into one another. c) to assist in safeguarding the countryside from encroachment; The site is physically well defined to the west, north and east that as a result its removal from the Green Belt and allocation for housing or safeguarding would not result in any further pressure for development or encroachment on the surrounding countryside in this part of Rossington. The site itself is in intensive agricultural use. It is not identified as being of particular ecoclogical or landscape or recreational value and being on the edge on urban areas it suffers from various urban fringe problems e.g. trespass. At the same time it occupies a sustainable location for new housing development. The Council, in its emerging Local Plan, already acknowledges the need to identify Greenfield land to meet the Borough's housing requirement over the plan period and in such circumstances we consider the land south of Grange Road to offer a sustainable development option with minimal impact in terms of countryside encroachment. d) to preserve the setting and special character of historic towns; and This purpose is not relevant to the land south of Grange Road. The site makes no contribution towards the setting or special character of any historic town. e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The recycling of by far the largest area of derelict land in Rossington (i.e. the former Colliery site) is already committed and well underway. The allocation of the land South of Grange Road for housing through the Local Plan will not compromise these works, but instead will assist in supporting the regeneration of Rossington. The more new housing that can be attracted to New Rossington, the more people will be attracted to the town with the resulting beneficial impact on the vitality and viability of local shops, services and community facilities. The prospect of 5000+ jobs being created on the edge of the town provides a unique opportunity to revitalise New Rossington. It needs to be complemented by new good quality housing in attractive and sustainable locations in and around Rossington to attract and retain the workforce. Housing development on the Rossington Colliery site on its own is not sufficient to maximise these benefits and additional sites need to be allocated through the Local Plan. (SEE EMAIL FOR Figure 2) 4. In the light of the above RHI would, the first instance, seek the allocation of Site 306 for housing as part of this emerging Local Plan in order to meet housing needs and demands and provide a range and choice of sites in the settlement. The site would represent a sustainable urban extension in a location that is not at risk of flooding and is close to shops, community facilities as well as existing and future employment opportunities. Failing this RHI would seek its removal from the Green Belt and its allocation as Safeguarded Land for potential housing development beyond the current Plan period. 5. RHI also would object to the strategy taken of Reserved Housing Allocations, rather than Safeguarded Land. As set out in paragraphs 4.82 - 4.83 of the Publication Draft, in order to maintain a 5-year housing land supply, the Local Plan is seeking to rely on windfall housing and 'Reserve Housing Allocations'. Reserve Housing Allocations are sites where there is currently doubt about whether they could be developed in the plan period, due to HS2 Safeguarding Route, and/or where allocation cannot be justified in accordance with a sequential approach to addressing flood risk. Therefore, there is no real guarantee that these sites will come forward. Whilst RHI do not object to the Reserved Housing Allocations themselves, the constraints they have mean that they may not be deliverable over the course of the plan period. This is not effective, and the lack of safeguarded land means the Plan is not compliant with National Policy. PROPOSED CHANGE As set out above, RHI do not consider the Local Plan to be sound as it is ineffective.
Summary:
RHI do not consider the Local Plan to be sound as it is ineffective and not compliant with national policy. RHI object that their site at Land at South of Grange Road (Site 306) has not been allocated for housing and seek the allocation as part of the Local Plan. The site would represent a sustainable urban extension in a location that is not at risk of flooding and is close to shops, community facilities as well as existing and future employment opportunities. Failing this RHI would seek its removal from the Green Belt and its allocation as Safeguarded Land for potential housing development beyond the current Plan period. RHI would suggest that in addition to Reserved Housing Allocations, Safeguarded Land should be included within the Local Plan. In RHI opinion these suggestions will allow the plan to be both effective and compliant with national policy.

Response:
There is no need to allocate any more land at Rossington, and the site is a Green Belt site which scored moderately weakly overall. As such, the allocation is not justified, and the matter is further covered in the Housing Topic Paper and Green Belt Topic Paper.
Please see attached statement which provides full explanation and justification for Harworth Group's objection to the Publication Version Local Plan in relation to Rossington, which comprises the following points: 1. Harworth Group supports the inclusion of site 662 and site 247 as allocations for housing development. 2. The draft Plan is not based on evidence as the allocation boundaries of site 662 and site 247 are incorrect insofar as they are inconsistent with the masterplan/outline planning permission, and with the extent of land identified by Harworth Group for future development. 3. The indicative capacity of dwellings of site 247 may not ensure that development makes “effective use of land” or “achieves appropriate densities” as required to be consistent with national policy. 4. The indicated rate of delivery from site 662 and site 247 is considered to be unduly low and therefore not evidence-based, given Harworth Group’s own evidence as master-developer of these sites and the delivery rate-to-date. Given the above, it is considered that Publication Draft Local Plan does not meet the tests of soundness insofar as it must be consistent with national policy and justified on the basis of evidence. Suggested changes to the Plan to ensure consistency with national policy and justification on the basis of evidence are summarised below. PROPOSED CHANGE Please see attached statement which provides full explanation and justification for Harworth Group’s suggested changes to the Publication Version Local Plan in relation to Rossington (sites 662 and 247). The following amendments are considered to be required to ensure that the plan is consistent with national policy, is based on appropriate evidence and therefore thereby justified and sound. 1. The south boundary of site 662 to be changed to match the outline planning permission masterplan and interface with the boundary of site 247 as proposed by Harworth Group. 2. Amend all boundaries of site 247 to match those proposed by Harworth Group as shown on plan ref. P13_4832_SK102. (SEE EMAIL FOR Plan) 3. Amend the Table H1(G) to reflect an expected delivery rate of 100 dwellings per annum (dpa) during years 0-5 and 70 dpa thereafter from site 662. 4. Amend Table H2(G) to reflect an indicative capacity of site 247 of 406 dwellings in accordance with the illustrative masterplan prepared by Harworth Group, to be delivered at a rate of 70 dwellings per annum. 5. Amend paragraph 16.129 to state: "The Local Plan identifies an additional phase therefore for the colliery to make good the balance of 1,200 units and realise the opportunity to make full and effective use of the former colliery land."

Table H1(G) Site Ref: 662 Address Site: Site of Former Rossington Colliery, off West End Lane, New Rossington Area (Ha): 51.7 Permission - Type: Outline/Full Status: Started Capacity (Net) - Total: 984 Units Remaining: 897 Achievability (deliverable & developable) - 0-5 Yrs: 464 5-10 Yrs: 350 11-15 Yrs: 83 15-17 Yrs: 0 Beyond Plan Period: 0 TOTALS Capacity (Net) - Total: 984 Units Remaining: 897 Achievability (deliverable & developable) - 0-5 Yrs: 464 5-10 Yrs: 350 11-15 Yrs: 83 15-17 Yrs: 0 Beyond Plan Period: 0 Table H2(G) Site Ref: 247 Address Site: Former Rossington Colliery, off West End Lane, Rossington Area (Ha): 14.1 Indicative Capacity (No of houses): 406 Achievability (deliverable & developable) - 0-5 Yrs: 0 5-10 Yrs: 0 11-15 Yrs: 267 15-17 Yrs: 139 Beyond Plan Period: 0 Site Ref: 1056 Address Site: Former Tornedale School Playing Fields & Gattison House, Gattison Lane, Rossington Area (Ha): 3.5 Indicative Capacity (No of houses): 92 Achievability (deliverable & developable) - 0-5 Yrs: 0 5-10 Yrs: 92 11-15 Yrs: 0 15-17 Yrs: 0 Beyond Plan Period: 0 TOTALS Indicative Capacity (No of houses): 498 Achievability (deliverable & developable) - 0-5 Yrs: 0 5-10 Yrs: 92 11-15 Yrs: 267 15-17 Yrs: 139 Beyond Plan Period: 0

Summary:
Re sites 662 (Rossington Colliery Housing site with PP) and 247 (Rossington Colliery - allocated Housing Site) Suggested amendments: 1. The south boundary of site 662 to be changed to match the outline planning permission masterplan and interface with the boundary of site 247 as proposed by Harworth Group. 2. Amend all boundaries of site 247 to match those proposed by Harworth Group as shown on plan ref. P13_4832_SK102. 3. Amend the Table H1 (G) to reflect an expected delivery rate of 100 dwellings per annum during year’s 0-5 and 70 dpa thereafter from site 662. 4. Amend Table H2(G) to reflect an indicative capacity of site 247 of 406 dwellings in accordance with the illustrative masterplan prepared by Harworth Group, to be delivered at a rate of 70 dwellings per annum. 5. Amend paragraph 16.129 to state: "The Local Plan identifies an additional phase therefore for the colliery to make good the balance of 1,200 units and realise the opportunity to make full and effective use of the former colliery land."

Re Policies and Site 1035 (Hill Top Denaby - Rejected Housing Site) Policy 3 ‘Level and Distribution of Growth’ Fails to satisfactorily direct light industrial, manufacturing and small scale distribution to the Main Towns, and in particular those in the west of the borough. Policy 4 and the associated Table 4 1. Fails to allocate any land for employment development in the Main Town of Conisbrough & Denaby. 2. Site 1035 should be included as an Employment allocation (part and Housing (part) 3. Site 383 (allocated site) - should be Greenbelt/Open space/Spots and recreation/local wildlife site. 4. Site 040 (allocated site)-should be retained as Greenbelt. 5. To meet housing need further sites should be allocated at Conisbrough and Denaby. Policy 6 and the associated Table H2 (D) Allocates site 040 and site 383 for housing development without satisfactory evidence to demonstrate these to represent the most appropriate strategy when considered against other reasonable alternatives. Green Belt Assessment and related Site Selection Methodology Results in the proposed removal of land from the Green Belt (site 040) which does not represent the most preferable option Also included: Site assessment of site 1035 to show it should be a preferred option to comparable sites.
Response:

Site boundaries have been amended as noted. The northern boundary now reflects the permission boundary, and the southern extent of site 247 is agreed - although there will be an amendment to the east of this to create a neat Green Belt boundary. Amendments will be made to the site capacities to reflect the anticipated yields as per the Council’s methodology for consistency rather than the developers suggestion for site 247, however Policy 6 allows for more or less housing to come forward on sites subject to design, so the figures stipulated are not limits. This provides consistency. 247 is thus expected to deliver 349 units now. Similarly, anticipated build outs will remain as per the Council’s methodology for consistency, but these are not annual limits, rather informed estimates. Para. 16.129 will be amended as suggested. With regards site 1035, the ELNA, Colliers report and Green Belt Topic Paper set out why there is no need or exceptional circumstance justification for releasing land in Conisbrough Denaby for employment uses. Site 040 scores more preferably for Green Belt release, and site 383 is not Green Belt, nor is there justification to make it Green Belt. Both sites are available and deliverable and preferred to site 1035, where access reservations also remain. The justification for the sites is set out in background documents, including the Site Selection Methodology, Green Belt Review, and Green Belt Topic Paper. Site 040 has been shown to be more preferable for Green Belt release, and on the balance of this and other factors is the preferred option here.
1. Harworth Group supports the inclusion of site 662 and site 247 as allocations for housing development in the Doncaster Local Plan Publication Version. These sites constitute the former Rossington Colliery site which is currently under development by Harworth Group as the ‘Torne Park’ / ‘Pheasant Hill Park’ scheme. Harworth Group is owner of the sites and lead developer responsible for delivery of development parcels, infrastructure and open space. 2. Within the development parcels, houses are delivered by housebuilders in conformity to a site-wide outline planning permission. To date, the scheme has delivered 166 completions across two plots by Harron Homes (Plot R1) and Taylor Wimpey (Plot R2), of which only 8 homes are yet to be sold. Taylor Wimpey (Plot R3) and Barratt Homes (Plot R4) are currently active on site, both with a three-year build period to deliver 195 and 190 homes respectively. Whilst no dwellings have been completed with these plots yet, a number of sales have already been agreed. 3. For reference, site 662 is an allocation with planning permission for housing development indicated at Table H1(G) to deliver a total of 984 dwellings. Site 247 is an allocation without planning permission for housing development indicated at Table H2(G) to deliver a total of 230 dwellings. 4. At the Preferred Options stage of Local Plan preparation, Harworth Group submitted representations that served to define the area of land available for allocation beyond that already with planning permission. For ease of reference, the same plan is attached to these representations (ref. P13_4832_SK102 ‘Phase 2 Location Plan’). This defined an area of 14.1 ha with an indicative capacity of 406 dwellings. (SEE EMAIL FOR Location Plan) 5. The Publication Version of the Local Plan, however, appears to have defined site 247 with incorrect boundaries as shown on the diagram below. This relates both to the boundary between site 662 and site 247, and the outer boundary of site 247 which despite looking similar in shape does not define the same land for allocation. Harworth Group therefore objects to the boundaries and extent of site 662 and site 247 as drafted in the Plan. (SEE EMAIL FOR Plans) 6. To help ensure consistency between the between the allocation of site 662 and the corresponding planning permission (masterplan), the boundary of site 662 should be amended from that currently drafted to that proposed by Harworth Group. A corresponding change to the boundary of site 247 will also serve to ensure clarity and consistency in the planning process when an application for site 247 is submitted. 7. For the avoidance of doubt, the boundary that Harworth Group promotes for site 247 is compatible with the approved reclamation works and creation of public open space (in the form of a country park) to the south of the proposed development area, as described fully in our representations to the Draft Policies and Proposed Sites consultation (October 2018). 8. As there appears to be no reason why an alternative boundary has been plotted in the Publication Version of the Plan, it is feasible that this is simply a plotting error. Whether intentional or otherwise, a correction to the proposed site boundary is required to ensure the Plan is appropriately evidence-based. With incorrect boundaries it is considered that the Plan is not justified as based on evidence and representing an appropriate strategy. 9. Harworth Group reiterates that it supports the inclusion of site 247 as an allocation for housing. 10. However, it is noted that the number of dwellings indicated to be deliverable from site 247 in the Publication Version is 230 units (across the incorrect site area of 9.35 ha). Representations submitted to the Preferred Options version of the Plan confirm the site area to be 14.1 ha, of which approximately 2.5 ha may be allowed for on-site public open space, leaving 11.6 ha for residential development. To make effective use of land, site 247 could deliver significantly more dwellings than the 230 indicated. An illustrative masterplan prepared by Harworth Group and submitted with the previous representations indicates that the site could accommodate up to 406 dwellings. 11. It is understood that from paragraph 16.129 of the Publication Draft Plan that the allocation of site 247 for 230 dwellings ‘serves to make good the balance of 1,200 units’ as permitted by the Rossington Colliery planning permission, taking into account those units already completed. Harworth Group promotes for site 247 is compatible with the approved reclamation works and creation of public open space (in the form of a country park) to the south of the proposed development area, as described fully in our representations to the Draft Policies and Proposed Sites consultation (October 2018). 12. As indicated above, 166 units have been completed to date and construction is underway on two phases totalling a further 283 units. Harworth Group’s current estimate therefore remains that the outline planning permission will deliver 984 units. 13. It would be more appropriate for the supporting text to state that "The Local Plan identifies an additional phase therefore for the colliery to make good the balance of 1,200 units and realise the opportunity to make full and effective use of the former colliery land." 14. This change would help ensure that the Plan conforms to the chapter 11 ‘Making effective use of land’ of the National Planning Policy Framework, and in particular paragraphs 122 and 123 which relate to ‘achieving appropriate densities of development. With the number of dwellings stated it is considered that the Plan is not justified as based on evidence and representing an appropriate strategy. 15. The Publication Version Local Plan assumes delivery of houses firstly from site 662 and then from site 247 at a rate of 70 units per annum, presumably comprising of two housebuilder outlets each delivering 35 units per annum. 16. As per our preceding representations, Harworth Group maintains that the scheme will be progressed at a faster rate than this, with two housebuilder outlets each delivering 50 units per annum. The accords to the planned three-year build period for both Plot R3 (195 units by Taylor Wimpey) and Plot R4 (190 units by Barratt Homes) which are underway at present. 17. Whilst Harworth Group would seek to continue delivery of units across the remainder of the scheme at this rate, it may be appropriate to be conservative in relation to future phases and apply a rate of 70 units per annum in total (i.e. two housebuilder outlets each delivering 35 units per annum, or allowing for any periods of inactivity between phases). 18. The effect of this is that the anticipated delivery phasing as set out in Table H1(G) as referenced from Policy 6 is inaccurate (i.e. unduly conservative) and should be amended to reflect Harworth Group's current anticipated delivery rate as follows: Site Ref: 662 Address Site: Site of Former Rossington Colliery, off West End Lane, New Rossington Area (Ha): 51.7 Permission - Type: Outline/Full Status: Started Capacity (Net) - Total: 984 Units Remaining: 897 Achievability (deliverable & developable) - 0-5 Yrs: 464 5-10 Yrs: 350 11-15 Yrs: 83 15-17 Yrs: 0 Beyond Plan Period: 0 TOTALS Capacity (Net) - Total: 984 Units Remaining: 897 Achievability (deliverable & developable) - 0-5 Yrs: 464 5-10 Yrs:
Incorrect boundaries and capacities have been used for site 247 - both to the south (though similar) and between the site and site 662. These should be amended accordingly. Site Ref: 247 Address Site: Former Rossington Colliery, off West End Lane, Rossington Area (Ha): 14.1 Indicative Capacity (No of houses): 406 Achievability (deliverable & developable) - 0-5 Yrs: 0 5-10 Yrs: 267 15-17 Yrs: 139 Beyond Plan Period: 0 Site Ref: 1056 Address Site: Former Tornedale School Playing Fields & Gattison House, Gattison Lane, Rossington Area (Ha): 3.5 Indicative Capacity (No of houses): 92 Achievability (deliverable & developable) - 0-5 Yrs: 0 5-10 Yrs: 92 15-17 Yrs: 0 Beyond Plan Period: 0 TOTALS Indicative Capacity (No of houses): 498 Achievability (deliverable & developable) - 0-5 Yrs: 0 5-10 Yrs: 92 11-15 Yrs: 267 15-17 Yrs: 139 Beyond Plan Period: 0 20. In summary, Harworth Group supports the allocation of site 662 and site 247 for housing in the Local Plan. However, it is considered that the following amendments are required to ensure that the plan is consistent with national policy, is based on appropriate evidence and therefore thereby justified and sound. - The south boundary of site 662 to be changed to match the outline planning permission masterplan and interface with the boundary of site 247 as proposed by Harworth Group. - Amend all boundaries of site 247 to match those proposed by Harworth Group as shown on plan ref. P13_4832_SK102. - Amend the Table H1(G) to reflect an expected delivery rate of 100 dwellings per annum (dpa) during years 0-5 and 70 dpa thereafter from site 662. - Amend Table H2(G) to reflect an indicative capacity of site 247 of 406 dwellings in accordance with the illustrative masterplan prepared by Harworth Group, to be delivered at a rate of 70 dwellings per annum. - Amend paragraph 16.129 to state: "The Local Plan identifies an additional phase therefore for the colliery to make good the balance of 1,200 units and realise the opportunity to make full and effective use of the former colliery land."
6.1. Firsure objects to Policy 6 and the proposed distribution of housing and that the following site is not a proposed allocations: - Site 302 and 305: Stripe Road, Rossington 6.2. The site is summarised below and technical information and advocacy report have been submitted alongside earlier representations. Further a report on the Role and Growth of Rossington is submitted alongside these representations. Test of Soundness 6.3. Firsure considers that the Local Plan is currently unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 6.4. Firsure is concerned that the Local Plan is not producing sufficient homes across the Borough. Further to comments in relation to Policy 3 Firsure recommends that further sites are identified to meet and exceed the requirement but also to provide a sufficient buffer to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the Framework requirements for the plan to be positively prepared and flexible. 6.5. Firsure is concerned that the proposed distribution of new homes does not reflect the spatial strategy, but importantly does not address the focus for economic and housing growth across the Sheffield City Region and Yorkshire and Humber as a whole. 6.6. The proposed distribution against the Council's own targets shows a deficiency and a significant under provision in: - Doncaster - Adwick - Conisbrough - Denaby - Mexborough - Thorne - Moorends - Sprotbrough - Tickhill - Bawtry 6.7. Firsure, as explained in response to Policy 2 and the spatial strategy considers that the spatial strategy is incorrect, that it does not provide for the growth of the Borough and does not reflect the role, function and location of the settlements. 6.8. Firsure, as explained in response to Policy 2 and 3, considers that there needs to be further consideration of housing and a slightly amended approach to the spatial strategy, which focusses growth towards Doncaster. There should be further growth of Rossington to address regeneration and the provision of new infrastructure. There should be growth in Thorne-Moorends, and a regeneration focus in Carcroft-Skellow which should elevate the status of the settlement commensurate to its role and function. New housing should be provided in Tickhill to address the current under provision. Wadworth should accommodate some new housing to reflect its role and function and provision should also be made in the villages to address the rural economy. 6.9. Firsure is particularly concerned that in Rossington there is only a single small housing allocation and an over reliance on one large allocated (formed by site 662 and 247). The role of Rossington should be the focus for growth and regeneration, given its strategic location next to the M18 with new infrastructure in the form of the Great Yorkshire Way, provision of major employment opportunities at i-Port and the airport, forming the largest employment allocations within Doncaster, which are adjacent to the settlement. Furthermore, the proposed new PGA golf course is adjacent to Rossington. With major expansion plans at the airport 'Aetropolis', Rossington is in a prime strategic location to benefit from such plans and associated housing should be provided to ensure Doncaster benefits from such inward investment. Firsure proposes that their site at Stripe Road can accommodate new housing 6.10. Further Firsure are concerned about the deliverability of a number of allocations within Rossington. 6.11. Site 662 and 247: The Colliery site. The Role and Growth of Rossington document considers the delivery rates currently achieved at the site. In 2017/18 there were 49 completions on site. Assuming delivery rates based on current and past performance at this site, then Firsure consider that only approximately 600 units will come forward on the Colliery site(s) within the Plan period. This is significantly below the delivery expected within the Local Plan which anticipates that 1127 homes can be delivered across the Colliery site(s). No further evidence on this site is put forward in the Doncaster five year deliverable housing land supply statement 6.12. Site 1056 - Former Torndale School Playing fields, This relatively small site is considered to be capable of delivering 92 dwellings. This is overly optimistic given the irregular shape of the site. The local plan identifies the site as delivering in years 6-10, thus the site does not appear to be capable of assisting with short term delivery in Rossington. 6.13. Based on the above it is clear that the deliverability and delivery rates of some of the sites in Doncaster ought to be reviewed to ensure that they reflect the site specific circumstances. Further allocations are required in to ensure that the delivery of the plans strategy. 6.14. Furthermore, there does not appear to be any safeguarded sites identified within the Local Plan. This is concerning given Policy 6 states that the Plan will designate Reserve Development Sites, yet those identified are not considered to be developable within the Plan Period due to significant constraints relating to flood risk and HS 2 Safeguarding, thus could not be relied on to maintain the supply of housing should other sites fail to deliver in the Plan period. As indicated in response to Policy 3 Firsure suggest, that safeguarded sites be proposed, to provide additional flexibility in accordance with national guidance. 6.15. Firsure consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 6.16. However, Firsure consider that with the allocation of site 302 and 305: Stripe Road, Rossington and adjustment in anticipated delivery within the plan period of sites 662 and 247 that the Local Plan can be found sound. Firsure will continue to work with the Council to develop appropriate modifications to the Local Plan. 6.17. To address these deficiencies in the Plan Firsure therefore suggest that the following sites be allocated: - Site 302 and 305: Stripe Road, Rossington 6.18. A short summary of the site is in the following sub-section and technical information and advocacy report have been attached to earlier representations. The Role and Growth of Rossington report is attached in support of the site.
Summary:
Objects to Policy 6 and the proposed distribution of housing.  Site 302 and 305: Stripe Road, Rossington, should be allocated for housing.  Technical information and advocacy report have been submitted alongside earlier representations. A report on the Role and Growth of Rossington is submitted as part of this representation. The Local Plan is not producing sufficient homes across the Borough. Further sites should be identified to meet and exceed the requirement and provide a sufficient buffer to deal with any under-delivery which is likely to occur from some sites. The proposed distribution of new homes does not reflect the spatial strategy, and importantly does not address the focus for economic and housing growth across the Sheffield City Region and Yorkshire and Humber as a whole. The proposed distribution against the Council’s own targets shows a deficiency and a significant under provision in: - Doncaster; - Adwick; - Conisbrough ? Denaby; - Mexborough; - Thorne ? Mooresnds; - Sprotbrough; - Tickhill; and - Bawtry  As explained in response to Policy 2, the spatial strategy is incorrect, in that it does not provide for the growth of the Borough and does not reflect the role, function and location of the settlements.  As explained in response to Policy 2 and 3, there needs to be further provision of housing and a slightly amended approach to the spatial strategy, which focuses growth towards Doncaster. There should be further growth of Rossington to address regeneration and the provision of new infrastructure. There should be growth in Thorne-Mooresnds, and a regeneration focus in Carcroft-Skellow which should elevate the status of the settlement commensurate to its role and function. New housing should be provided in Tickhill to address the current under provision. Wadworth should accommodate some new housing to reflect its role and function and provision should also be made in the villages to address the rural economy. Particularly concerned that in Rossington there is only a single small housing allocation and an over reliance on one large allocated (formed by site 662 and 247). The role of Rossington should be the focus for growth and regeneration, given its strategic location next to the M18 with new infrastructure in the form of the Great Yorkshire Way, provision of major employment opportunities at i-Port and the airport, forming the largest employment allocations within Doncaster, which are adjacent to the settlement. Furthermore, the proposed new PGA golf course is adjacent to Rossington. With major expansion plans at the airport ‘Aetropolis’, Rossington is in a prime strategic location to benefit from such plans and associated housing should be provided to ensure Doncaster benefits from such inward investment.  Concerned about the deliverability of a number of allocations within Rossington, namely Site 662 and 247 and 1056. Based on this it is clear that the deliverability and delivery rates of some of the sites in Doncaster ought to be reviewed to ensure that they reflect the site specific circumstances. Further allocations are required in to ensure that the delivery of the plans strategy. Furthermore, there does not appear to be any safeguarded sites identified within the Local Plan. This is concerning given Policy 6 states that the Plan will designated Reserve Development Sites, yet those identified are not considered to be developable within the Plan Period due to significant constraints relating to flood risk and HS 2 Safeguarding, thus could not be relied on to maintain the supply of housing should other sites fail to deliver in the Plan period.

Response:
Supply at Rossington is healthy and can surpass the housing target for the settlement without utilising Green Belt. There is therefore no need to allocate further land in this settlement, less so Green Belt. Suitable additional allocations on urban sites have been made, however. Overall the borough can meet and surpass its housing targets and most settlements can meet their housing targets, or get within their ranges. Those that cannot be offset by supply elsewhere. This is explained in the Housing Topic Paper.
6.19. Firsure is particularly concerned that in Rossington there is only a single small housing allocation and an over reliance on one large existing commitment. The role of Rossington should be the focus for growth and regeneration, given its strategic location next to the M18 with new infrastructure in the form of the Great Yorkshire Way, provision of major employment opportunities at i-Port and the airport, which are adjacent to the settlement. Furthermore, the proposed new PGA golf course is adjacent to Rossington. With major expansion plans at the airport ‘Aetropolis’, Rossington is in a prime strategic location to benefit from such plans and associated housing should be provided to ensure Doncaster benefits from such inward investment. Firsure proposes that their site at Stripe Road can accommodate new housing to meet that need. 6.20. Firsure objects that Site 302 and 305 at Stripe Road, Rossington site is not allocated and should be identified as a housing site. It is noted that the councils site selection summary indicates that this is because Green Belt release cannot be justified as housing need is being met. However in our response to Policy 2, 3 and 6, Firsure maintain that the Plan does not identify sufficient sites to meet the needs of the area. 6.21. Firsure considers the proposed site is available, suitable and achievable and is therefore in accordance with the Framework a deliverable site able to come forward in the short term. 6.22. The deliverability and benefits of the Stripe Road, Rossington site is as follows: Overview of Proposals 6.23. The site is located on the edge of an established residential area and benefits from easy access to the full range of services and facilities located within Rossington. The site is surrounded by urban development with residential development on two sides and the East Coast Mainline. The site is approximately 18.5ha gross and could accommodate in the region of 500 new homes.  (SEE EMAIL FOR Plan) Deliverability 6.24. The site at Stripe Road, Rossington provides a development opportunity that is available, suitable and achievable and therefore it is considered that the site is deliverable, in accordance with national planning policy and guidance. It is promoted by Firsure which further demonstrates the site's deliverability within the plan period. Availability 6.25. The land is being promoted by Firsure. The site is therefore available in accordance with the Framework and the National Planning Practice Guidance (PPG). 6.26. The proposed development can make an efficient and attractive use of the land. The site represents an excellent opportunity for future housing and development. This site allows housing to be delivered within an appropriate and sustainable location within Rossington. Suitability 6.27. The site is located in a highly sustainable location and has residential development to the north, east and west. The site is within easy walking distance to local centres with a range of facilities provided there as well as greater facilities within Doncaster Town Centre, a bus ride away. There are a large number of primary and a secondary schools in the vicinity of the site. 6.28. The site is well served by buses providing opportunities for sustainable travel to work in Doncaster and beyond with access to Doncaster Railway Station. 6.29. The development will provide additional quality development that will benefit Rossington and the wider district with economic, environmental and social benefits. It is therefore considered that the development is suitable. Green Belt 6.30. Due to the significant need and demand for housing and aspirations for economic and housing growth there is clearly a requirement for a strategic review of the approach to locations for future growth within the district. In order to plan for appropriate for the plan period there is a need to review the Green Belt boundaries. A thorough review of the development limits of Doncaster settlements would ensure a holistic approach to the location of development for the future of the Borough. 6.31. The housing needs of Doncaster are putting severe pressure on the local authority to review the Green Belt. To meet the housing requirement Doncaster Council recognises that some Green Belt land will need to be released for new housing land. Stripe Road, Rossington is a unique opportunity to positively use the Green Belt and meet the housing need for the area. 6.32. In the Borough of Doncaster approximately 46% of the area is designated as Green Belt. This is the western part of the Borough which forms part of the South Yorkshire Green Belt surrounding urban areas. 6.33. The Framework explains that there are five purposes of including land within the Green Belt, which is: 1. To check the unrestricted sprawl of large built up areas; 2. To prevent neighbouring towns merging into one another; 3. To assist in safeguarding the countryside from encroachment; 4. To preserve the setting and special character of historic towns; and 5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land. 6.34. Contextually, the site is “contained” by development and activity being a “tongue” of land which protrudes into the urban area of Rossington surrounded by residential properties and the East Coast Main Line, beyond which is non-Green Belt countryside. Within this context the release of the site from the Green Belt has limited impact on "openness" and that redevelopment of the site would have low impact on the purposes of including land within the Green Belt. 6.35. The Framework states that Green Belt boundaries should be drawn so as not to include land which it is unnecessary to keep permanently open. The impact on the openness of the Green Belt will be limited. The site is bounded by the urban area to the north, and partially to the east and west. To the south is an established track from Stripe Road to a level crossing with a tree belt to the south of it. This track and tree belt form a robust boundary for the site. The tree belt will prevent views between the remainder of the Green Belt and the site. 6.36. The site is therefore contained and will not lead to unrestricted sprawl or encroachment. The site is a protrusion of Green Belt into Rossington and is contained within its setting. The site would not therefore lead to the coalescence of towns. Whilst the development would result in development of some countryside the degree of encroachment into the countryside would be minimised. The site has no impact upon the setting of a historic town. 6.37. Firsure propose that the new Green Belt boundary follows Stripe Road, Common Lane and the East Coast Main Line which is clear and well defined and would be a “rounding off” of Rossington. This boundary would accord with the Framework and ensure that the Green Belt is clearly defined using readily recognisable features to ensure permanency reinforcing the urban context whilst providing a robust boundary for the future. 6.38. All the boundaries have the potential to be further reinforced within the site through additional planting to ensure an effective transition between the development and the countryside beyond. Achievable 6.39. A range of technical work is being undertaken and further
survey work is ongoing. From the initial assessments there are no technical issues that would prevent development or are insurmountable. The site is therefore considered to be achievable and therefore deliverable in accordance with national guidance. The technical assessments will be submitted in due course and are available upon request. Effective Use of Land 6.40. Although the site is greenfield, the proposed scheme will utilise and enhance existing infrastructure. Although the site is not previously developed it is currently under-utilised. The site is easily accessible and the proposed main access is off Stripe Road. The scheme is therefore making an efficient and effective use of land and infrastructure. Delivering a Flexible Supply of Housing 6.41. The Framework requires Local Planning Authorities to meet their full objectively assessed housing need. Finsure considers that the site at Stripe Road, Rossington is deliverable in the short term and will reinforce the housing supply and address the Borough’s housing needs in the early periods of the Local Plan. The site is fully capable of being delivered in the next 5 years. A Positive Response to the Key Objectives of the Framework 6.42. The Framework sets out that the Governments key housing policy goal of boosting significantly the supply of housing and proactively driving and supporting sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs. The Framework explains that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as extensions to towns, and creating mixed and sustainable communities with good access to jobs, key services and infrastructure. Sites should also make effective use of land and existing infrastructure. 6.43. In relation to the Framework: - The proposal responds positively towards national guidance. - The site is appropriate for accommodating growth, being an expansion of an existing settlement. - The proposed site is accessible to existing local community facilities, infrastructure and services, including public transport. - The site has been assessed and is available, suitable and achievable for development Benefits of Stripe Road, Rossington 6.44. The development of the site would provide significant benefits. The site would provide housing that would meet the needs of the Rossington and Doncaster Borough housing market. Therefore this site provides a unique opportunity in a sustainable location. 6.45. In accordance with the Framework this representation has shown that: - The site is suitable for housing and can deliver circa 500 new homes. - The proposal will deliver high quality housing. - The proposal will deliver affordable housing. - The proposal can provide a good mix of housing commensurate to the demand and need in the area. - The scheme uses land efficiently and effectively. - The proposal is in line with planning for housing objectives. - The site is within a sustainable location situated in close proximity to facilities and services and also to bus stops for local bus routes. - The scheme will create direct and indirect job opportunities both during and after construction. 6.46. The proposal is an appropriate site to provide for the housing needs of Rossington and Doncaster in the short term. The allocation of the site would confirm its potential to help continue the provision of a balanced housing supply in the Borough in sustainable locations. The site can deliver a full range and mix of housing and a sustainable community. Development of the site would deliver housing and affordable housing. Doncaster needs to have a robust housing trajectory and the site at Stripe Road, Rossington would assist with this delivery in the short term. The site is situated within a prime location suitable for residential development and as such would facilitate the development of land in a more effective and efficient manner. Development of the site would not harm or undermine the areas wider policy objectives, but seeks to reinforce the need to develop sites within sustainable locations as a priority. 6.47. The site is available, suitable and achievable and therefore deliverable in accordance with the Framework. Proposed Change 6.48. To overcome the objection and address soundness matters, the Council should: - Allocate: o Site 302 and 305: Stripe Road, Rossington

Summary:

Site 302 and 305 at Stripe Road, Rossington, should be allocated as a housing site. The councils site selection summary indicates Green Belt release cannot be justified as housing need is being met. However it is maintained that the Plan does not identify sufficient sites to meet the needs of the area. The proposed site: - is available, suitable and achievable and is therefore a deliverable site able to come forward in the short term. - can make an efficient and attractive use of the land and be delivered within an appropriate and sustainable location within Rossington. - is located in a highly sustainable location and has residential development to the north, east and west. It is within easy walking distance to local centres with a range of facilities provided there as well as greater facilities within Doncaster Town Centre, a bus ride away. There are a large number of primary and a secondary schools in the vicinity of the site. - is well served by buses providing opportunities for sustainable travel to work in Doncaster and beyond with access to Doncaster Railway Station. Due to the significant need and demand for housing and aspirations for economic and housing growth there is clearly a requirement for a strategic review of the approach to locations for future growth within the district. In order to plan for appropriate for the plan period there is a need to review the Green Belt boundaries. A thorough review of the development limits of Doncaster settlements would ensure a holistic approach to the location of development for the future of the Borough. Contextually, the site is "contained" by development and activity being a "tongue" of land which protrudes into the urban area of Rossington surrounded by residential properties and the East Coast Main Line, beyond which is non-Green Belt countryside. Within this context the release of the site from the Green Belt has limited impact on "openness" and that redevelopment of the site would have low impact on the purposes of including land within the Green Belt. The site will not lead to unrestricted sprawl or encroachment. The site is a protrusion of Green Belt into Rossington and is contained within its setting. The site would not therefore lead to the coalescence of towns. Whilst the development would result in development of some countryside the degree of encroachment into the countryside would be minimised. The site has no impact upon the setting of a historic town. It is proposed that the new Green Belt boundary follows Stripe Road, Common Lane and the East Coast Main Line which is clear and well defined and would be a "rounding off" of Rossington. The site is achievable. A range of technical work is being undertaken and further survey work is ongoing. From initial assessments there are no technical issues that would prevent development or are insurmountable. The site is an effective Use of Land. Although greenfield, the proposed scheme will utilise and enhance existing infrastructure. The site is easily accessible and the proposed main access is off Stripe Road. The scheme is therefore making an efficient and effective use of land and infrastructure.

Response:

Supply at Rossington is healthy and can surpass the housing target for the settlement without utilising Green Belt. There is therefore no need to allocate further land in this settlement, less so Green Belt. Suitable additional allocations on urban sites have been made, however. Overall the borough can meet and surpass its housing targets and most settlements can meet their housing targets, or get within their ranges. Those that cannot are offset by supply elsewhere. This is explained in the Housing Topic Paper.
### Comment:

This site adjoins the boundary of Thorne Conservation Area. Paragraph 185 of the NPPF sets out a requirement for Local Plans to conserve heritage assets in a manner appropriate to their significance. When considering the impact of a proposed development upon the significance of a designated heritage asset, Paragraph 193 of the NPPF makes it clear that great weight should be given to the asset's conservation and explains that significance can be harmed by development within its setting. In addition, the Council has a statutory duty under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay "special attention" to "the desirability of preserving or enhancing the character or appearance" of its Conservation Areas. The Conservation Area Appraisal identifies several areas of this site where the trees are considered to make a positive contribution to the character of the Conservation Area. The Appraisal also considered that the site made such an important contribution to the Conservation Area and to the setting of Thorne House (a building identified as a key unlisted building) that it recommended that the boundary of the Conservation Area be amended to include virtually all of this site. In view of the contribution which this site makes to the character of the Conservation Area, it is difficult to envisage how 24 houses could be built without harming elements which have been identified as contributing to the significance of the Conservation Area. PROPOSED CHANGE Delete Site 133

### Summary:

Suggest the site allocation should be deleted as the site adjoins the Thorne Conservation Area and makes an important contribution to the setting of the Conservation Area and the proposed capacity of 24 units is not realistic.

### Response:

The site has been identified via the emerging Thorne-Moorends Neighbourhood Plan as one of only a few sites available that are not constrained by flood risk. The capacity of 24 units is as per the Neighbourhood Plan also. The adjacent site has also been assessed by the Neighbourhood Plan, but is not being supported due to the loss of trees on the site. Capacities in the Local Plan are indicative and not binding. The Local Plan housing allocation policy (Policy 6) states that schemes with a lower density will be supported where they result in a better design solution. The developer requirements also set out some of the considerations that an application will need to take into account at the Development Management stage. Notwithstanding this, it is proposed to add further detail to the developer requirements (Appendix 2) to emphasise some of the important design considerations/constraints/solutions that will need to be overcome as follows: Conservation & Heritage The site makes an important contribution to the conservation area and the setting of Thorne House (key unlisted building). The contribution of the site to the significance of these heritage assets will need to be assessed in a heritage statement where it should also be demonstrated that 24 units would not result in harm to this significance. Potential tree planting and landscaping should be incorporated.
The Local Plan is not a true reflection of the local community desire to develop and or representative of the consultation carried out which promoted both sites 469 & 009 for residential development. It does not represent the neighbourhood plan covering Thorne Moorends. It fails to reflect the Borough Strategy (Doncaster Growing Together) and Doncaster's Inclusive Growth Strategy. The decision to allocate no development in Moorends is contrary to the National Planning Policy Framework. The Local Plan ignores the Objectively Assessed Need and Affordable Housing Need for Moorends. opting instead to cluster Thorne and Moorends together and in the process failing to meet the needs of both. The emerging Local Plan allocates 52 hectares of employment land approximately 11% of the Boroughs total allocation within walking, cycling distance of both Thorne and Moorends and approximately 200 meters from site 469 and 800 meters of site 009 however the housing allocation for Thorne and Moorends is a meagre 5.5%. The Environment Agency have no objection to development at a finished floor level of 3.5 meters nor is there any objection from any other statutory consultee. The site is sustainable and close to schools, retail, community facilities and transport links. PROPOSED CHANGE  Doncaster Councils Local Plan needs to accurately reflect the needs of individual communities. It should follow the NPPF principles of sustainable development. It should let all communities' share in Doncaster's growth and should follow the principles of the neighbourhood plan.

Summary:
Re sites 469 and 009 (rejected Housing allocations)  o The Local Plan does not reflect the outcomes of local consultation and does not fairly reflect the needs of the communities it serves. Growth in the area is supported by the majority of local people and the consultation promoted 469 and 009 for residential development.  o The Local Plan does not represent the Neighbourhood Plan for Thorne and Moorends, or the Borough Strategy, or the Inclusive Growth Strategy.  o It also does not reflect the Objectively Assessed Need and Affordable Housing Need for Moorends, and combines the areas of Thorne and Moorends which means it fails to meet the needs of both communities.  o The decision not to allocate land in Moorends is contrary to national policy.  o There is 11% (52ha) of the boroughs employment land adjacent to Thorne and Moorends, including 469 and 009 which are within 200m of allocated employment land, however the Thorne and Moorends housing requirement is just 5.5%.  o The Environment Agency have no objections if floor levels are above 3.5m, and other statutory consultees have not objected. The site is sustainable and close to schools, retail, community facilities and transport links. Proposed change:  o The Local Plan needs to accurately reflect the needs of individual communities and should follow the NPPF principles of sustainable development. All communities should be able to share in Doncaster’s growth and the Local Plan should follow the principles of the Neighbourhood Plan.

Response:
Site 469 and 009 are in flood zone 3. No allocations are being made anywhere in the borough in areas of flood risk and this would constitute unacceptable development in an area of flood risk. Moorends is grouped with Thorne to reflect the neighbourhood Plan and Town Council boundary and between the two areas, enough housing can be delivered to get within the housing range. Site 469 has generated numerous objections in both planning applications and the Local Plan.
The Local Plan is unsound because it is not based / reflective of the extensive public consultation carried out locally which promoted site 469 for residential development. It failed in its duty to co-operate with Thorne Moorends Town Council throughout the preparation of both the Local Plan and the Thorne Moorends Neighbourhood Plan. It fails to reflect the Borough Strategy (Doncaster Growing Together) and Doncaster’s Inclusive Growth Strategy. The decision to allocate no development in Moorends is contrary to the National Planning Policy Framework which positively promotes sustainable development in sustainable communities and Moorends is a very sustainable community readily recognised in both the Local Development Framework Core Strategy with a housing allocation of up to 400 and the Local Plan it is a main Town with a population well in excess of 5,000. Moorends is one of Doncaster’s most deprived communities with a desperate need for regeneration it as poor education, health, economic outcomes and housing regeneration is essential to stimulate improvement both to the current housing stock and the local economy. The Local Plan ignores both the Objectively Assessed Need and Affordable Housing Need for Moorends opting instead to cluster Thorne and Moorends together and in the process failing to meet the needs of both. The emerging Local Plan allocates 52 hectares of employment land approximately 11% of the Boroughs total allocation within walking, cycling distance of both Thorne and Moorends and approximately 200 meters from site 469 however the housing allocation for Thorne and Moorends is a meagre 5.5%. The Environment Agency have no objection to development at a finished floor level of 3.5 meters nor is there any objection from any other statutory consultee. The National Planning Policy Framework supports sustainable development site 469 is sustainable within 400 meters of 2 Schools a Health Centre, Children’s Centre, Community Centre, Retail Centre and Public Transport Links. PROPOSED CHANGE Doncaster Councils Local Plan needs to accurately reflect the OAN and AHN for individual communities. It needs to truly reflect the NPPF principles of sustainable development. It needs to conform to the Borough Strategy ensuring all communities’ share in Doncaster’s growth. It should reflect the Inclusive Growth Strategy (no community being left behind.) To meet its Statutory Duty to Co-operate it should engage with local communities not pay lip service.

Summary:
The Local Plan is unsound. It is not based on, or reflective of the extensive public consultation carried out locally which promoted site 469 for residential development. The Local Plan has failed in its duty to co-operate with Thorne and Moorends Town Council throughout the preparation of both the Local Plan and the Thorne & Moorends. The Local Plan fails to reflect the Borough Strategy (Doncaster Growing Together) and the Inclusive Growth Strategy. Not allocating any development in Moorends is contrary to the NPPF which positively promotes sustainable development in sustainable communities. Moorends is very sustainable and was recognised as such in the Core Strategy with an allocation of up to 400. In the Local Plan it is a Main Town with a population above 5,000. Moorends is one of the most deprived communities in Doncaster and in need of regeneration. Housing regeneration is essential to stimulate improvement of the current stock and the local economy. The Local Plan ignores the Objectively Assessed Need and affordable housing need for Moorends and chooses to cluster it with Thorne and fails to meet the needs of both. 11% of the boroughs employment land (52ha) is within walking and cycling distance of Thorne and Moorends and 200m from site 469, however the allocation for Thorne and Moorends is only 5.5%. The Environment Agency have no objections to a floor level of 3.5m nor do any other statutory consultees object. Site 469 is sustainable and within 400m of two schools, a health centre, a children’s centre, community centre, retail centre and transport links. The NPPF supports sustainable development, and site 469 is.

Response:
The Local Plan has undertaken extensive public consultation. The site lies within flood zone 3, and the Local Plan is making no allocations in such areas, irrespective of location. Thorne and Moorends can get within its housing range without allocating this land or any land in flood zones. It is one settlement to reflect the town council boundary. Additionally, throughout the Local Plan process, Thorne and Moorends town Council have been kept informed of developments, consulted and have also met with Local Plans team officers.
Comment Ref: C/Sites 469 and 009/03210/1/001
Name: Ms Lorna Norman
CUSREF: 03210
Date: 29/09/2019
Organisation:
Representing:

Comment Ref: C/Sites 469 and 009/03210/1/001
Name: Ms Lorna Norman
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Representing:

Comment:
The Local Plan is not a true reflection of the neighbourhood plan nor does it represent the consultation carried out which promoted both sites 469 & 009 for residential development. It fails to reflect the Borough Strategy (Doncaster Growing Together) and Doncaster’s Inclusive Growth Strategy. The decision to allocate no development in Moorends is contrary to the National Planning Policy Framework, it ignores the objectively assessed need and affordable housing need for Moorends. Due to this fact it now fails to meet the needs of both Thorne and Moorends. The emerging Local Plan allocates 52 hectares of employment land approximately 11% of the Boroughs total allocation within walking, cycling distance of both Thorne and Moorends and approximately 200 meters from site 469 and 800 meters of site 009. All compulsory statutory consultees have no objections. The National Planning Policy Framework supports sustainable development site 469 & 009 are both sustainable and very close to 2 Schools, Health Centre, Children's Centre, Community Centre, Retail Centre and Public Transport Links. PROPOSED CHANGE Doncaster Councils Local Plan needs to accurately reflect the needs of individual communities and should follow the NPPF principles of sustainable development. It should let all communities' share in Doncaster’s growth and should follow the principles of the Neighbourhood Plan.

Summary:
The Doncaster Local Plan is not a reflection of the neighbourhood plan, nor does it represent the consultation carried out which promoted site 469 and 009 for residential development. It does not reflect the Borough Strategy or Inclusive Growth Strategy; not allocating land in Moorends is contrary to the NPPF and ignores the affordable housing need here, and; it does not reflect the objectively assessed needs of the area and fails to meet the interests of both communities as it groups them together. There is 11% (52ha) of the boroughs employment land adjacent to Thorne and Moorends, including 469 and 009 which are within 200m of allocated employment land, however the Thorne and Moorends housing requirement is just 5.5%. The Environment Agency have no objections if floor levels are above 3.5m, and other statutory consultees have not objected. The site is sustainable and close to schools, retail, community facilities and transport links. Proposed change: The Local Plan needs to accurately reflect the needs of individual communities and should follow the NPPF principles of sustainable development. All communities should be able to share in Doncaster’s growth and the Local Plan should follow the principles of the Neighbourhood Plan.

Response:
Site 469 and 009 are in flood zone 3. No allocations are being made anywhere in the borough in areas of flood risk and this would constitute unacceptable development in an area of flood risk. Moorends is grouped with Thorne to reflect the neighbourhood Plan and Town Council boundary and between the two areas, enough housing can be delivered to get within the housing range. Site 469 has generated numerous objections in both planning applications and the Local Plan.
**Comment Ref:** C/Sites 469 and 009/03216/1/001  
**Attend Examination:** Written Representation

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**Area:** Chapter 16: Spatial Proposals  
**Policy:** Main Town - Thorne-Moorends

The Local Plan is not a true reflection of the neighbourhood plan nor does it represent the consultation carried out which promoted both sites 469 & 009 for residential development. It fails to reflect the Borough Strategy (Doncaster Growing Together) and Doncaster’s Inclusive Growth Strategy. The decision to allocate no development in Moorends is contrary to the National Planning Policy Framework, it ignores the objectively assessed need and affordable housing need for Moorends. Due to this fact it now fails to meet the needs of both Thorne and Moorends. The emerging Local Plan allocates 52 hectares of employment land approximately 11% of the Boroughs total allocation within walking, cycling distance of both Thorne and Moorends and approximately 200 meters from site 469 and 800 meters of site 009. All compulsory statutory consultees have no objections. The National Planning Policy Framework supports sustainable development site 469 & 009 are both sustainable and very close to 2 Schools, Health Centre, Children’s Centre, Community Centre, Retail Centre and Public Transport Links. PROPOSED CHANGE Doncaster Councils Local Plan needs to accurately reflect the needs of individual communities and should follow the NPPF principles of sustainable development. It should let all communities’ share in Doncaster’s growth and should follow the principles of the Neighbourhood Plan.

**Summary:**

The Doncaster Local Plan is not a reflection of the neighbourhood plan, nor does it represent the consultation carried out which promoted site 469 and 009 for residential development. It does not reflect the Borough Strategy or Inclusive Growth Strategy; not allocating land in Moorends is contrary to the NPPF and ignores the affordable housing need here, and; it does not reflect the objectively assessed needs of the area and fails to meet the interests of both communities as it groups them together. There is 11% (52ha) of the boroughs employment land adjacent to Thorne and Moorends, including 469 and 009 which are within 200m of allocated employment land, however the Thorne and Moorends housing requirement is just 5.5%. The Environment Agency have no objections if floor levels are above 3.5m, and other statutory consultees have not objected. The site is sustainable and close to schools, retail, community facilities and transport links. Proposed change: The Local Plan needs to accurately reflect the needs of individual communities and should follow the NPPF principles of sustainable development. All communities should be able to share in Doncaster’s growth and the Local Plan should follow the principles of the Neighbourhood Plan.

**Response:**

Site 469 and 009 are in flood zone 3. No allocations are being made anywhere in the borough in areas of flood risk and this would constitute unacceptable development in an area of flood risk. Moorends is grouped with Thorne to reflect the neighbourhood Plan and Town Council boundary and between the two areas, enough housing can be delivered to get within the housing range. Site 469 has generated numerous objections in both planning applications and the Local Plan.
The Local Plan is not a true reflection of the local community desire to develop or representative of the consultation carried out which promoted both sites 469 & 009 for residential development. It does not represent the neighbourhood plan covering Thorne Moorends. It fails to reflect the Borough Strategy (Doncaster Growing Together) and Doncaster’s Inclusive Growth Strategy. The decision to allocate no development in Moorends is contrary to the National Planning Policy Framework. The Local Plan ignores the Objectively Assessed Need and Affordable Housing Need for Moorends. opting instead to cluster Thorne and Moorends together and in the process failing to meet the needs of both. The emerging Local Plan allocates 52 hectares of employment land approximately 11% of the Boroughs total allocation within walking, cycling distance of both Thorne and Moorends and approximately 200 meters from site 469 & 800 meters of site 009 however the housing allocation for Thorne and Moorends is a meagre 5.5%. The Environment Agency have no objection to development at a finished floor level of 3.5 meters nor is there any objection from any other statutory consultee. The National Planning Policy Framework supports sustainable development site 469 & 009 are both sustainable and very close to 2 Schools, Health Centre, Children’s Centre, Community Centre, Retail Centre and Public Transport Links. 

PROPOSED CHANGE Doncaster Council’s Local Plan needs to accurately reflect the needs of individual communities. It should follow the NPPF principles of sustainable development. It should let all communities’ share in Doncaster’s growth and should follow the principles of the neighbourhood plan. TICKED WRITTEN REP BUT INCLUDED FOLLOWING: The main reason I have completed this detail is due to the total disregard for the neighbourhood plan of Thorne and Moorends

Response:
Site 469 and 009 are in flood zone 3. No allocations are being made anywhere in the borough in areas of flood risk and this would constitute unacceptable development in an area of flood risk. Moorends is grouped with Thorne to reflect the neighbourhood Plan and Town Council boundary and between the two areas, enough housing can be delivered to get within the housing range. Site 469 has generated numerous objections in both planning applications and the Local Plan.
6.1. H. Burtwistle & Son objects to Policy 6 and the proposed distribution of housing and that the following site is not a proposed allocations: - Site 244/331: Coulman Road, Thorne 6.2. The site is summarised below and technical information and an advocacy report have been submitted alongside earlier representations. Test of Soundness 6.3. H. Burtwistle & Son considers that the Local Plan is currently unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 6.4. H. Burtwistle & Son is concerned that the Local Plan is not producing sufficient homes across the Borough. Further to comments in relation to Policy 3 H. Burtwistle & Son recommends that further sites are identified to meet and exceed the requirement but also to provide a sufficient buffer to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the Framework requirements for the plan to be positively prepared and flexible. 6.5. H. Burtwistle & Son is concerned that the proposed distribution of new homes does not reflect the spatial strategy, but importantly does not address the focus for economic and housing growth across the Sheffield City Region and Yorkshire and Humber as a whole. 6.6. The proposed distribution against the Council's own targets shows a deficiency and a significant under provision in: - Doncaster - Adwick - Conisbrough - Denaby - Mexborough - Thorne - Moorends - Sprotbrough - Tickhill - Bawtry 6.7. H. Burtwistle & Son, as explained in response to Policy 2 and the spatial strategy considers that the spatial strategy is incorrect, that it does not provide for the growth of the Borough and does not reflect the role, function and location of the settlements. 6.8. H. Burtwistle & Son, as explained in response to Policy 2 and 3, considers that there needs to be further provision of housing and a slightly amended approach to the spatial strategy, which focusses growth towards Doncaster. There should be further growth of Rossington to address regeneration and the provision of new infrastructure. There should be growth in Thorne-Moorends, and a regeneration focus in Carrcroft-Skellow which should elevate the status of the settlement commensurate to its role and function. New housing should be provided in Tickhill to address the current under provision. Wadworth should accommodate some new housing to reflect its role and function and provision should also be made in the villages to address the rural economy. 6.9. H. Burtwistle & Son is particularly concerned that there is an under provision of housing proposed in Thorne-Moorends, which the proposed spatial distribution should be accommodating in the region of 1,020 new homes. There is presently a significant under provision in the settlement (circa 736 dwellings), which cannot be met through allocations in other settlements. H. Burtwistle & Son proposes that their site at Coulman Road can accommodate part of that housing need. 6.10. Thorne-Moorends is a highly sustainable settlement with a range of shops and services available in the town. The proximity of these services and a number of businesses/employment parks to the site creates employment opportunities to any potential incoming residents into the locality. 6.11. H. Burtwistle & Son therefore consider that the settlement is able to and should accommodate more development, which would assist the regeneration and renewal of the settlement and assist in the economic and housing growth aspirations of the Borough and Region. Further it would assist with the delivery of the Spatial Strategy as set out in Policy 2, which seeks to deliver approximately 40% of new homes in the Main Towns, which would equate to approximately 7360 dwellings based on an annual requirement of 920 dpa. As stated in our response to Policy 3, H. Burtwistle & Son consider the requirement should be circa 1000/1300dpa. 6.12. Thorne-Moorends is in a prime strategic location near to significant existing and proposed employment parks and further housing provided to ensure Doncaster benefits from such inward investment. H. Burtwistle & Son proposes that their site at Coulman Road can accommodate new housing to meet that need. 6.13. Further H. Burtwistle & Son are concerned that there is an overreliance on smaller infill housing allocations, where due to nature of the site and flooding constraints viability may be an issue, or historic unitary development plan allocations that have not come forward to date. 6.14. H. Burtwistle & Son object to the allocation of Site 081/343. H. Burtwistle & Son note the currently undetermined planning application, however this is a longstanding allocation and there is little additional evidence available through the HELAA, Residential Land Availability Study or the Doncaster 5 Year Deliverable Housing Land Supply Statement to demonstrate that the site will come forward in the short term. 6.15. H. Burtwistle & Son object to the allocation of Site 795. This site had a permission but this has since lapsed and therefore raises significant questions about the deliverability of the site. 6.16. H Burtwistle & Son object to the allocation of Site 510. This is a narrow and constrained infill site, with railway forming the southern boundary of the site. There is little evidence available through the Councils evidence base to indicate any developer interest in the site. 6.17. Based on the above it is clear that the deliverability of some of the sites in Doncaster ought to be reviewed to ensure that they reflect the site specific circumstances. Further allocations are required in Doncaster to ensure that the Plans strategy can be delivered. 6.18. Furthermore, there does not appear to be any safeguarded sites identified within the Local Plan. This is concerning given Policy 6 states that the Plan will designated Reserve Development Sites, yet those identified are not considered to be developable within the Plan Period due to significant constraints relating to flood risk and HS 2 Safeguarding, thus could not be relied on to maintain the supply of housing should other sites fail to deliver in the Plan period. As indicated in response to Policy 3 H. Burtwistle & Son proposes suggest, that safeguarded sites be proposed, to provide additional flexibility in accordance with national guidance. 6.19. H. Burtwistle & Son consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 6.20. However, H. Burtwistle & Son consider that with the proposed allocation that the Local Plan can be found sound. H. Burtwistle & Son will continue to work with the Council to develop appropriate modifications to the Local Plan.
information and an advocacy report has been submitted alongside earlier representations. Site 244/331: Coulman Road, Thorne 6.23. H. Burtwistle & Son consider that Thorne-Moorends is able to and should accommodate more development, which would assist the regeneration and renewal of the settlement and assist in the economic and housing growth aspirations of the Borough and Region. Thorne is in a prime strategic location near to significant existing and proposed employment parks and further housing provided to ensure Doncaster benefits from such inward investment. 6.24. H. Burtwistle & Son objects that Site 244/331 at Coulman Road, Thorne site is not allocated and should be identified as a housing site. Technical studies are ongoing but initial assessments demonstrate the site's deliverability. 6.25. H. Burtwistle & Son object that the site has been discounted in relation to Flood Risk, particularly when other sites within Flood Zone 3 are being allocated within the Local Plan. A Flood Risk and Drainage Assessment, including a Sequential Assessment has been prepared and has been submitted alongside earlier representations, this demonstrates that the site is developable from a flood risk and drainage perspective. Technical studies are ongoing but initial assessments demonstrate the site's deliverability. 6.26. H. Burtwistle & Son considers the proposed site is available, suitable and achievable and is therefore in accordance with the Framework a deliverable site able to come forward in the short term. 6.27. The deliverability and benefits of the Coulman Road, Thorne site is as follows: Overview of Proposals 6.28. The site is located on the edge of an established residential area and benefits from easy access to the full range of services and facilities located within Thorne-Moorends. The site is surrounded by urban development with housing on to the west, which includes a new Keepmoat scheme, and employment development to the west. On the Unitary Development Plan Proposals Map the site is shown as part of an employment allocation - EMP2(26). The site is approximately 6ha gross and could accommodate in the region of 170 new homes. Deliverability 6.29. The site at Coulman Road, Thorne provides a development opportunity that is available, suitable and achievable and therefore it is considered that the site is deliverable, in accordance with national planning policy and guidance. It is promoted by the landowner H. Burtwistle & Son which further demonstrates the site's deliverability within the plan period. Availability 6.30. The land is being promoted by H. Burtwistle & Son. The site is therefore available in accordance with the Framework and the National Planning Practice Guidance (PPG). 6.31. The proposed development can make an efficient and attractive use of the land. The site represents an excellent opportunity for future housing and development. This site allows housing to be delivered within an appropriate and suitable location within Thorne-Moorends. Suitability 6.32. The site is located in a highly sustainable location and has residential development to the east and employment development to the west and south. The site is also partly an employment allocation in the Unitary Development Plan - EMP2(26). The site is within easy walking distance to the centre of Thorne-Moorends with a range of facilities provided there, as well as greater facilities within Doncaster Town Centre, a bus ride away. There are a number of primary schools and a secondary school in the vicinity of the site. 6.33. The site is well served by buses providing opportunities for sustainable travel to work in Doncaster. The site is also accessible to Thorne North and South Railway Stations, which has access to Doncaster, Sheffield, Hull, Scunthorpe and Manchester Airport. 6.34. The development will provide additional quality development that will benefit Thorne-Moorends and the wider district with economic, environmental and social benefits. It is therefore considered that the development is suitable. Achievable 6.35. A range of technical work is being undertaken and further survey work is ongoing. H. Burtwistle & Son object that the site has been discounted in relation to Flood Risk. A Flood Risk and Drainage Assessment, including a Sequential Assessment has been prepared, which demonstrates that the site is developable from a flood risk and drainage perspective. 6.36. From the initial assessments there are no technical issues that would prevent development or are insurmountable. The site is therefore considered to be achievable and therefore deliverable in accordance with national guidance. The technical assessments will be submitted in due course and are available upon request. Effective Use of Land 6.37. The site is part brownfield with the site frontage forming part of an existing employment allocation - EMP2(26). The proposed scheme will utilise and enhance existing infrastructure and a currently under-utilised site. The site is easily accessible and the proposed main access is off Coulman Road. The scheme is therefore making an efficient and effective use of land and infrastructure. Delivering a Flexible Supply of Housing 6.38. The Framework requires Local Planning Authorities to meet their full objectively assessed housing need. H. Burtwistle & Son considers that the site at Northgate, Moorends is deliverable in the short term and will reinforce the housing supply and address the Borough's housing needs in the early periods of the Local Plan. The site is fully capable of being delivered in the next 5 years. A Positive Response to the Key Objectives of the Framework 6.39. The Framework sets out that the Government's key housing policy goal of boosting significantly the supply of housing and proactively driving and supporting sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs. The Framework explains that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as extensions to towns, and creating mixed and sustainable communities with good access to jobs, key services and infrastructure. Sites should also make effective use of land and existing infrastructure. 6.40. In relation to the Framework: - The proposal responds positively towards national guidance. - The site is appropriate for accommodating housing growth, being an expansion of an existing settlement. - The proposed site is accessible to existing local community facilities, infrastructure and services, including public transport. - The site has been assessed and is available, suitable and achievable for development. Benefits of Coulman Road, Thorne 6.41. The development of the site would provide significant benefits. The site would provide housing that would meet the needs of Thorne-Moorends and Doncaster Borough housing market. Therefore this site provides a unique opportunity in a sustainable location. 6.42. In accordance with the Framework this representation has shown that: - The site is suitable for housing and can deliver circa 170 new homes. - The proposal will deliver high quality housing. - The proposal will deliver affordable housing. - The proposal can provide a good mix of housing commensurate to the demand and need in the area. - The scheme uses land efficiently and effectively. - The proposal is in line with planning for housing objectives. - The site is within a sustainable location situated in close proximity to facilities and services and also to bus stops for local bus routes. - The scheme will create direct and indirect job opportunities both during and after construction. 6.43. The proposal is an appropriate site to provide for the housing needs of Thorne-Moorends and Doncaster in the short term. The allocation of the site would confirm its potential to help continue the provision of a balanced housing supply in the Borough in sustainable locations. The site can deliver a full range and mix of housing and a sustainable community. Development of the site would deliver housing and affordable housing. Doncaster needs to have a robust housing trajectory and the site at Coulman Road, Thorne would assist with this delivery in the short term. The site is situated within a prime location suitable for residential development and as such would facilitate the development of land in a more effective and efficient manner. Development of the site would not harm or undermine the areas wider policy objectives, but seeks to reinforce the need to develop sites within sustainable locations as a priority. 6.44. The site is available, suitable and achievable and therefore deliverable in accordance with the Framework. Proposed Change 6.45. To overcome the objection and address soundness matters, the Council should: - Allocate: o Site 244/331: Coulman Road, Thorne

Summary:

Policy 6 Housing allocations 1. Under provision in Thorne and Moorends 2. Site 244 & 331 should be allocated (in depth advocacy for sites included). 3. Object to allocation of sites 81, 343, 795, 510 (various reasons but mainly deliverability)
Both site 244 and 331 are in Flood Zone 3, where no allocations are being made. 081 and 343 are subject to a planning application being determined, site 510 and 795 are in Flood Zone 1 and are supported in the Thorne & Moorends Neighbourhood Plan. Thorne & Moorends is projected to deliver within its range and therefore is meeting its targets - although flood risk means it cannot deliver to the top of its range.
6.1. H. Burtwistle & Son objects to Policy 6 and the proposed distribution of housing and that the following site is not a proposed allocations: Site 313/245: Northgate, Moorends

6.2. The site is summarised below and technical information and an advocacy report have been submitted alongside earlier representations. Test of Soundness

6.3. H. Burtwistle & Son considers that the Local Plan is currently unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification

6.4. H. Burtwistle & Son is concerned that the Local Plan is not producing sufficient homes across the Borough. Further to comments in relation to Policy 3 H. Burtwistle & Son recommends that further sites are identified to meet and exceed the requirement but also to provide a sufficient buffer to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the Framework requirements for the plan to be positively prepared and flexible.

6.5. H. Burtwistle & Son is concerned that the proposed distribution of new homes does not reflect the spatial strategy, but importantly does not address the focus for economic and housing growth across the Sheffield City Region and Yorkshire and Humber as a whole.

6.6. The proposed distribution against the Council's own targets shows a deficiency and a significant under-provision in: Doncaster - Adwick - Conisbrough - Denaby - Mexborough - Thorne - Moorends - Sprotbrough - Tickhill - Bawtry.

6.7. H. Burtwistle & Son, as explained in response to Policy 2 and the spatial strategy considers that the spatial strategy is incorrect, that it does not provide for the growth of the Borough and does not reflect the role, function and location of the settlements.

6.8. H. Burtwistle & Son, as explained in response to Policy 2 and 3, considers that there needs to be further provision of housing and a slightly amended approach to the spatial strategy, which focusses growth towards Doncaster. There should be further growth of Rossington to address regeneration and the provision of new infrastructure. There should be growth in Thorne-Moorends, and a regeneration focus in Carcroft-Skellow which should elevate the status of the settlement commensurate to its role and function. New housing should be provided in Tickhill to address the current under provision. Wadworth should accommodate some new housing to reflect its role and function and provision should also be made in the villages to address the rural economy.

6.9. H. Burtwistle & Son is particularly concerned that there is an under provision of housing proposed in Thorne-Moorends, which the proposed spatial distribution should be accommodating in the region of 1,020 new homes. There is presently a significant under provision in the settlement (circa 736 dwellings), which cannot be met through allocations in other settlements. H. Burtwistle & Son proposes that their site at Northgate can accommodate part of that housing need.

6.10. Thorne-Moorends is a highly sustainable settlement with a range of shops and services available in the town. The proximity of these services and a number of businesses/employment parks to the site creates employment opportunities to any potential incoming residents into the locality.

6.11. H. Burtwistle & Son therefore consider that the settlement is able to and should accommodate more development, which would assist the regeneration and renewal of the settlement and assist in the economic and housing growth aspirations of the Borough and Region. Further it would assist with the delivery of the Spatial Strategy as set out in Policy 2, which seeks to deliver approximately 40% of new homes in the Main Towns, which would equate to approximately 7360 dwellings based on an annual requirement of 920 dpa. As stated in our response to Policy 3, H. Burtwistle & Son consider the requirement should be circa 1000/1300dpa.

6.12. Thorne-Moorends is in a prime strategic location near to significant existing and proposed employment parks and further housing provided to ensure Doncaster benefits from such inward investment. H. Burtwistle & Son proposes that their site at Northgate can accommodate new housing to meet that need.

6.13. Further H. Burtwistle & Son are concerned that there is an over-reliance on smaller infill housing allocations, where due to nature of the site and flooding constraints viability may be an issue, or historic unitary development plan allocations that have not come forward to date.

6.14. H Burtwistle & Son object to the allocation of Site 081/343. H. Burtwistle & Son note the currently under-determined planning application, however this is a longstanding allocation and there is little additional evidence available through the HELAA, Residential Land Availability Study or the Doncaster 5 - Year Deliverable Housing Land Supply Statement to demonstrate that the site will come forward in the short term.

6.15. H Burtwistle & Son object to the allocation of Site 795. This site had a permission but this has since lapsed and therefore raises significant questions about the deliverability of the site.

6.16. H Burtwistle & Son object to the allocation of Site 510. This is a narrow and constrained infill site, with railway forming the southern boundary of the site. There is little evidence available through the Councils evidence base to indicate any developer interest in the site. Based on the above it is clear that the deliverability of some of the sites in Doncaster ought to be reviewed to ensure that they reflect the site specific circumstances. Further allocations are required in Doncaster to ensure that the Plans strategy can be delivered.

6.17. Furthermore, there does not appear to be any safeguarded sites identified within the Local Plan. This is concerning given Policy 6 states that the Plan will designated Reserve Development Sites, yet those identified are not considered to be developable within the Plan Period due to significant constraints relating to flood risk and HS 2 Safeguarding, thus could not be relied on to maintain the supply of housing should other sites fail to deliver in the Plan period. As indicated in response to Policy 3 H. Burtwistle & Son proposes suggest, that safeguarded sites be proposed, to provide additional flexibility in accordance with national guidance.

6.18. H. Burtwistle & Son consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound.

6.19. However, H. Burtwistle & Son consider that with the proposed allocation that the Local Plan can be found sound. H. Burtwistle & Son will continue to work with the Council to develop appropriate modifications to the Local Plan.

Proposed Change: 6.21. To address these deficiencies and overcome the objection and address soundness matters in the Plan the following site should be allocated: Site 313/245: Northgate, Moorends.

6.22. A short summary of the site is in the following sub-section and technical
information and an advocacy report has been submitted alongside earlier representations. Site 313/245: Northgate, Moornds 6.23. H. Burtwistle & Son consider that Thorne-Moornds is able to and should accommodate more development, which would assist the regeneration and renewal of the settlement and assist in the economic and housing growth aspirations of the Borough and Region. Moornds is in a prime strategic location near to significant existing and proposed employment parks and further housing provided to ensure Doncaster benefits from such inward investment. 6.24. H. Burtwistle & Son objects that Site 313/245 at Northgate, Moornds site is not allocated and should be identified as a housing site. This site is proposed in relation to Flood Risk. Other sites within Flood Zone 3 have been allocated for housing such as A Flood Risk and Drainage Assessment, including a Sequential Assessment has been prepared and has been submitted alongside earlier representations, this demonstrate a drainage strategy for the site and that the site is developable from a flood risk and drainage perspective. Technical studies are ongoing but initial assessments demonstrate the site's deliverability. 6.26. H. Burtwistle & Son considers the proposed site is suitable, sustainable and achievable and is therefore in accordance with the Framework a deliverable site able to come forward in the short term. 6.27. The deliverability and benefits of the Northgate, Moornds site is as follows: Overview of Proposals 6.28. The site is located on the edge of an established residential area and benefits from easy access to the full range of facilities and services located within Thorne-Moornds. The site is surrounded by urban development with housing on two sides and a railway line and former colliery. The site is approximately 16ha and could accommodate in the region of 400 new homes. Deliverability 6.29. The site at Northgate, Moornds provides a development opportunity that is available, sustainable and achievable and therefore it is considered that the site is deliverable, in accordance with national planning policy and guidance. It is promoted by the landowner H. Burtwistle & Son which further demonstrates the site’s deliverability within the plan period. Availability 6.30. The land is being promoted by H. Burtwistle & Son. The site is therefore available in accordance with the Framework and the National Planning Practice Guidance (PPG). 6.31. The proposed development can make an efficient and attractive use of the land. The site represents an excellent opportunity for future housing and development. This site allows housing to be delivered within an appropriate and sustainable location within Thorne-Moornds. Suitability 6.32. The site is located in a highly sustainable location and has residential development to the south and east. The site is within easy walking distance to the centre of Thorne-Moornds with a range of facilities provided there, as well as greater facilities within Doncaster Town Centre, a bus ride away. There are a number of primary schools and a secondary school in the vicinity of the site. 6.33. The site is well served by the bus providing opportunities for sustainable travel to work in Doncaster. The site is also accessible to Thorne North and South Railway Stations, which has access to Doncaster, Sheffield, Hull, Scunthorpe and Manchester Airport. 6.34. The development will provide additional quality development that will benefit Thorne-Moornds and the wider district with economic, environmental and social benefits. It is therefore considered that the development is sustainable. Achievable 6.35. A range of technical work is being undertaken and further survey work is ongoing. H. Burtwistle & Son object that the site has been discounted in relation to Flood Risk. A Flood Risk and Drainage Assessment, including a Sequential Assessment has been prepared and has been submitted alongside earlier representations, this demonstrates that the site is developable from a flood risk and drainage perspective. 6.36. From the initial assessments there are no technical issues that would prevent development or are insurmountable. The site is therefore considered to be achievable and therefore deliverable in accordance with national guidance. The technical assessments will be submitted in due course and are available upon request. Effective Use of Land 6.37. Although the site is greenfield, the proposed scheme will utilise and enhance existing infrastructure. Although the site is not previously developed it is currently under-utilised. The site is easily accessible and the proposed main access is off Northgate. The scheme is therefore making an efficient and effective use of land and infrastructure. Delivering a Flexible Supply of Housing 6.38. The Framework requires Local Planning Authorities to meet their full objectively assessed housing need. H. Burtwistle & Son considers that the site at Northgate, Moornds is deliverable in the short term and will reinforce the housing supply and address the Borough’s housing needs in the early periods of the Local Plan. The site is fully capable of being delivered in the next 5 years. A Positive Response to the Key Objectives of the Framework 6.39. The Framework sets out that the Government’s key housing policy goal of boosting significantly the supply of housing and proactively driving and supporting sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs. The Framework explains that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as extensions to towns, and creating mixed and sustainable communities with good access to jobs, key services and infrastructure. Sites should also make effective use of land and existing infrastructure. 6.40. In relation to the Framework: - The proposal responds positively towards national guidance. - The site is appropriate for accommodating housing growth, being an expansion of an existing settlement. - The proposed site is accessible to existing local community facilities, infrastructure and services, including public transport. - The site has been assessed and is available, sustainable and achievable for development. Benefits of Northgate, Moornds 6.41. The development of the site would provide significant benefits. The site would provide housing that would meet the needs of Thorne-Moornds and Doncaster Borough housing market. Therefore this site provides a unique opportunity in a sustainable location. 6.42. In accordance with the Framework this representation has shown that: - The site is suitable for housing and can deliver circa 400 new homes. - The proposal will deliver high quality housing. - The proposal will deliver affordable housing. - The proposal can provide a good mix of housing commensurate to the demand and need in the area. - The scheme uses land efficiently and effectively. - The proposal is in line with planning for housing objectives. - The site is within a sustainable location situated in close proximity to facilities and services and also to bus stops for local bus routes. - The scheme will create direct and indirect job opportunities both during and after construction. 6.43. The proposal is an appropriate site to provide for the housing needs of Thorne-Moornds and Doncaster in the short term. The allocation of the site would confirm its potential to help continue the provision of a balanced housing supply in the Borough in sustainable locations. The site can deliver a full range and mix of housing and a sustainable community. Development of the site would deliver housing and affordable housing. Doncaster needs to have a robust housing trajectory and the site at Northgate, Moornds would assist with this delivery in the short term. The site is situated within a prime location suitable for residential development and as such would facilitate the development of land in a more effective and efficient manner. Development of the site would not harm or undermine the areas wider policy objectives, but seeks to reinforce the need to develop sites within sustainable locations as a priority. 6.44. The site is available, suitable and achievable and therefore deliverable in accordance with the Framework. Proposed Change 6.45. To overcome the objection and address soundness matters, the Council should: - Allocate: o Site 313/245: Northgate, Moornds Summary: H Burtwistle & Son object to Policy 6 and the proposed distribution and that the site at Northgate Moornds (313/245) is not allocated. Concerned that the Local Plan is not producing sufficient homes across the Borough. The proposed distribution of new homes does not reflect the spatial strategy and does not address the focus for economic and housing growth across the Sheffield City Region and Yorkshire and Humber as a whole. The proposed distribution against the Council's own targets shows a deficiency and a significant under provision in - Doncaster; - Adwick; - Conisbrough - Denaby; - Mexborough; - Thorne - Moornds; - Sprotbrough; - Tickhill; and - Bawtry The spatial strategy considers that the spatial strategy is incorrect, does not provide for the growth of the Borough and does not reflect the role, function and location of the settlements. As explained in response to Policy 2 and 3, there needs to be further provision of housing and a slightly amended approach to the spatial strategy, which focusses growth towards Doncaster. Consider that with the proposed allocations and the deletion or adjustment in anticipated delivery within the plan period of sites 081/343, 795 and 510 that the Local Plan can be found sound. To address the identified

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deficiencies in the Plan Site 313/245 Northgate, Moorends, should be allocated: Deliverability; the site is available, suitable and achievable therefore considered deliverable. Availability: the land is being promoted by H Burtwistle & Son considered available. Suitability: the site is located in a highly sustainable location and has residential development to the south and east, within easy walking distance to the centre, which has a range of services and facilities. Well provided for area with well served public transport and number of schools. Therefore considered that the development is suitable. Achievable: object to the site been discounted in relation to flood risk technical work has been submitted to demonstrate that the site is developable. Therefore, considered achievable. Effective Use of Land: Although greenfield, the proposed scheme will utilise and enhance existing infrastructure. And is currently under-utilised. The site is easily accessible. Delivering a Flexible Supply of Housing: the site is deliverable in the short term and will reinforce the housing supply and address the Borough’s housing needs in the early periods of the Local Plan. - The site is suitable for housing and can deliver circa 400 new homes. - The proposal will deliver high quality housing. - The proposal will deliver affordable housing. - The proposal can provide a good mix of housing commensurate to the demand and need in the area. - The scheme uses land efficiently and effectively. - The proposal is in line with planning for housing objectives. - The site is within a sustainable location situated in close proximity to facilities and services and also to bus stops for local bus routes. - The scheme will create direct and indirect job opportunities both during and after construction.

Response:
Both sites 245 and 313 are in Flood Zone 3, where no allocations are being made. Aside from Mexborough, the Main Urban Area and all the Main Towns mentioned are only short against the top of their ranges. As the Housing Topic Paper explains, not all of these settlements need to meet the top of their range, as long as the overall number balances out at approx. 90% of housing in these two areas, which it does. In Bawtry and Sprotbrough the shortfall against the target is relatively small and in Tickhill there are no other suitable sites. However, overall the borough is delivering enough housing across the plan period, and shortfalls are made up for in other areas. Sites have been identified land in each settlement in the hierarchy.
Comment Ref: C/Sites 469 and 009/03774/2/001

Attend Examination: Written Representation

Area: Chapter 16: Spatial Proposals

Policy: Main Town - Thorne-Moorends

Tests of Soundness: Positively prepared

Effective

Justified

Consistent with national

Summary:
The Doncaster Local Plan is not a true reflection of the local community desire to develop and or representative of the consultation carried out which promoted both sites 469 & 009 for residential development. It does not represent the neighbourhood plan covering Thorne Moorends. It fails to reflect the Borough Strategy (Doncaster Growing Together) and Doncaster's Inclusive Growth Strategy. The decision to allocate no development in Moorends is contrary to the National Planning Policy Framework. The Local Plan ignores the Objectively Assessed Need and Affordable Housing Need for Moorends. opting instead to cluster Thorne and Moorends together and in the process failing to meet the needs of both. The emerging Local Plan allocates 52 hectares of employment land approximately 11% of the Boroughs total allocation within walking, cycling distance of both Thorne and Moorends and approximately 200 meters from site 469 and 800 meters of site 009 however the housing allocation for Thorne and Moorends is a meagre 5.5%. The Environment Agency have no objection to development at a finished floor level of 3.5 meters nor is there any objection from any other statutory consultee. The National Planning Policy Framework supports sustainable development site 469 & 009 are both sustainable and very close to 2 Schools, Health Centre, Children's Centre, Community Centre, Retail Centre and Public Transport Links. PROPOSED CHANGE  Doncaster Councils Local Plan needs to accurately reflect the needs of individual communities. It should follow the NPPF principles of sustainable development. It should let all communities' share in Doncaster's growth and should follow the principles of the neighbourhood plan.

Response:
Site 469 and 009 are in flood zone 3. No allocations are being made anywhere in the borough in areas of flood risk and this would constitute unacceptable development in an area of flood risk. Moorends is grouped with Thorne to reflect the neighbourhood Plan and Town Council boundary and between the two areas, enough housing can be delivered to get within the housing range. Site 469 has generated numerous objections in both planning applications and the Local Plan.
The Local Plan is not a true reflection of the local community desire to develop and or representative of the consultation carried out which promoted both sites 469 & 009 for residential development. It does not represent the neighbourhood plan covering Thorne Moorends. It fails to reflect the Borough Strategy (Doncaster Growing Together) and Doncaster’s Inclusive Growth Strategy. The decision to allocate no development in Moorends is contrary to the National Planning Policy Framework. The Local Plan ignores the Objectively Assessed Need and Affordable Housing Need for Moorends. opting instead to cluster Thorne and Moorends together and in the process failing to meet the needs of both. The emerging Local Plan allocates 52 hectares of employment land approximately 11% of the Boroughs total allocation within walking, cycling distance of both Thorne and Moorends and approximately 200 meters from site 469 and 800 meters of site 009 however the housing allocation for Thorne and Moorends is a meagre 5.5%. The Environment Agency have no objection to development at a finished floor level of 3.5 meters nor is there any objection from any other statutory consultee. The National Planning Policy Framework supports sustainable development site 469 & 009 are both sustainable and very close to 2 Schools, Health Centre, Children’s Centre, Community Centre, Retail Centre and Public Transport Links.

PROPOSED CHANGE Doncaster Councils Local Plan needs to accurately reflect the needs of individual communities. It should follow the NPPF principles of sustainable development. It should let all communities' share in Doncaster’s growth and should follow the principles of the neighbourhood plan.

Response:
Site 469 and 009 are in flood zone 3. No allocations are being made anywhere in the borough in areas of flood risk and this would constitute unacceptable development in an area of flood risk. Moorends is grouped with Thorne to reflect the neighbourhood Plan and Town Council boundary and between the two areas, enough housing can be delivered to get within the housing range. Site 469 has generated numerous objections in both planning applications and the Local Plan.
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**Comment:**

I believe the Doncaster Local Plan has not been prepared in line with statutory regulations and is not fit for purpose in its current format for the following reasons: - The Doncaster Local Plan does not accurately represent the outcome of the local consultation process and therefore does not fairly reflect the needs/interests of the local communities it serves. Growth and development in the communities of Thorne and Moorends is supported by the majority of people who live in the area and the consultation carried out highlights this by promoting sites 469 & 009 for residential development. - The Doncaster Local Plan does not represent the neighbourhood plan covering the areas of Thorne & Moorends. - The Doncaster Local Plan does not reflect the Borough Strategy (Doncaster Growing Together) and Doncaster's Inclusive Growth Strategy. - The Doncaster Local Plan does not reflect the Objectively Assessed Need and Affordable Housing Need for Moorends combining the areas of Thorne and Moorends and in doing so, failing to meet the needs/interests of both communities. - The decision to allocate no development in Moorends is contrary to the National Planning Policy Framework. - The emerging Local Plan allocates 52 hectares of employment land approximately 11% of the Boroughs total allocation within walking, cycling distance of both Thorne and Moorends and approximately 200 meters from site 469 & 800 meters of site 009 however, the housing allocation for Thorne and Moorends is a disproportionate 5.5%. - The Environment Agency have no objection to development at a finished floor level of 3.5 meters nor is there any objection from any other statutory consultee. - The National Planning Policy Framework supports sustainable development and sites 469 & 009 are both sustainable and very close to 2 Schools, Health Centre, Children's Centre, Community Centre, Retail Centre and Public Transport Links. PROPOSED CHANGE - The Doncaster Local Plan requires amendment to ensure that it accurately reflects the needs/interests of the individual communities it serves. - The Doncaster Local Plan should follow the National Planning Policy Framework principles of sustainable development. - The Doncaster Local Plan should enable all communities to share in Doncaster's growth and should adhere to the principles of the neighbourhood plan.

**Summary:**

The Doncaster Local Plan does not: - Accurately represent the outcome of local consultation and the needs and interests of the local communities it serves. Most local people support growth and development and consultation highlighted that sites 469 and 009 should be allocated for development; - Represent the Thorne and Moorends neighbourhood plan; - Reflect the Borough Strategy or Inclusive Growth Strategy; - Reflect the objectively assessed needs of the area and fails to meet the interests of both communities; - Accord with the NPPF - not allocating land in Moorends is contrary to the NPPF; There is 11% (52ha) of the boroughs employment land adjacent to Thorne and Moorends, including 469 and 009 which are within 200m of allocated employment land, however the Thorne and Moorends housing requirement is just 5.5%. The Environment Agency have no objections if floor levels are above 3.5m, and other statutory consultees have not objected. The site is sustainable and close to schools, retail and community facilities and is sustainable. Proposed change: the Local Plan should accurately reflect the needs of individual communities, follow NPPF principals of sustainable development and let all communities share in Doncaster's growth, as well as following the principles of the neighbourhood plan.

**Response:**

Site 469 and 009 are in flood zone 3. No allocations are being made anywhere in the borough in areas of flood risk and this would constitute unacceptable development in an area of flood risk. Moorends is grouped with Thorne to reflect the neighbourhood Plan and Town Council boundary and between the two areas, enough housing can be delivered to get within the housing range. Site 469 has generated numerous objections in both planning applications and the Local Plan.
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Summary:
The Local Plan does not reflect the outcomes of local consultation and does not fairly reflect the needs of the communities it serves. Growth in the area is supported by the majority of local people and the consultation promoted 469 and 009 for residential development. The Local Plan does not represent the Neighbourhood Plan for Thorne and Moorends, or the Borough Strategy, or the Inclusive Growth Strategy. It also does not reflect the Objectively Assessed Need and Affordable Housing Need for Moorends which means it fails to meet the needs of both communities. The decision not to allocate land in Moorends is contrary to national policy. There is 11% (52ha) of the borough’s employment land adjacent to Thorne and Moorends, including 469 and 009 which are within 200m of allocated employment land, however the Thorne and Moorends housing requirement is just 5.5%. The Environment Agency have no objections if floor levels are above 3.5m, and other statutory consultees have not objected. The site is sustainable and close to schools, retail, community facilities and transport links. Proposed change: The Local Plan needs to accurately reflect the needs of individual communities and should follow the NPPF principles of sustainable development. All communities should be able to share in Doncaster’s growth and the Local Plan should follow the principles of the Neighbourhood Plan.

Response:
Site 469 and 009 are in flood zone 3. No allocations are being made anywhere in the borough in areas of flood risk and this would constitute unacceptable development in an area of flood risk. Moorends is grouped with Thorne to reflect the neighbourhood Plan and Town Council boundary and between the two areas, enough housing can be delivered to get within the housing range. Site 469 has generated numerous objections in both planning applications and the Local Plan.
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**Comment:**

The Local Plan neither accurately or fairly represents the consultation carried out nor echoes the local communities desire to develop the area and bring more affordable housing. Both areas which promoted both sites 469 and 009 for residential development. The plan fails to reflect both the Borough Strategy (Doncaster Growing Together) and Doncaster’s Inclusive Growth Strategy and the neighbourhood plan covering Thorne and Moorends. The decision made in the plan to allocate no development in Moorends is totally conflicting the National Planning Policy Framework and it fails to acknowledge the ‘objectively assessed need and affordable housing need in Moorends’. Instead going totally against the recommended plans by not choosing to develop. The plan has chosen to cluster Thorne and Moorends together, which has resulted in the failure of meeting the needs of either area. The emerging Local Plan allocates 52 hectares of employment land, approximately 11% of the Boroughs total allocation, within walking, cycling distance of both Thorne and Moorends and approximately 200 meters from site 469 and 800 meters of site 009. However, the housing allocation for Thorne and Moorends is an absolutely inadequate 5.5%. The Environment Agency have no objection to development at a finished floor level of 3.5 meters nor is there any objection from any other statutory consultee. The National Planning Policy Framework supports sustainable development site 469 and 009 are both sustainable and very close to two Schools, Health Centre, Children's Centre, Community Centre, Retail Centre and Public Transport Links. I believe the plan has failed to put across adequate points as to why this development has been turned down as, from many (not just my own) point of view, there are a multitude of positive aspects this development would bring to the area, that far outweigh the negatives (if any). In my opinion, they have objected to plans to satisfy a minority of opposing views, rather than thinking of the needs of the greater community living in these areas. The population in Moorends will continue to grow and it is important that there are plans put in place to help these people by making affordable houses available. PROPOSED CHANGE The Doncaster Councils Local Plan should let all communities' share in Doncaster's growth and should follow the principles of the neighbourhood plan. The Plan needs to accurately reflect the needs of individual communities. Rather than bundling two areas together. It should also follow the NPPF principles of sustainable development.

**Summary:**

The Local Plan does not reflect the local community desire to develop or representative of consultation, which promoted site 469 and 009 for residential development. It does not represent the Thorne and Moorends Neighbourhood Plan, the Borough Strategy or the Inclusive Growth Strategy. Not allocating land in Moorends is contrary to the NPPF. The Local Plan ignores objectively assessed need and affordable housing need in Moorends and clusters Thorne and Moorends together and fails to meet the needs of both. There is 11% (52ha) of the boroughs employment land adjacent to Thorne and Moorends, including 469 and 009 which are within 200m of allocated employment land, however the Thorne and Moorends housing requirement is just 5.5%. The Environment Agency have no objections if floor levels are above 3.5m, and other statutory consultees have not objected. The site is sustainable and close to schools, retail and community facilities and is sustainable. The plan has failed to adequately explain why this development has been rejected as many people believe the development would bring many positives to the area which outweigh any negatives. The objection is to satisfy a minority of opposing views, rather than thinking of the greater local community needs. Development can provide affordable housing for Moorends growing population. Proposed change: the Local Plan should accurately reflect the needs of individual communities - not place Thorne and Moorends together; follow NPPF principals of sustainable development and let all communities share in Doncaster's growth and; should follow the principles of the neighbourhood plan - which the Local Plan disregards.

**Response:**

Site 469 and 009 are in flood zone 3. No allocations are being made anywhere in the borough in areas of flood risk and this would constitute unacceptable development in an area of flood risk. Moorends is grouped with Thorne to reflect the neighbourhood Plan and Town Council boundary and between the two areas, enough housing can be delivered to get within the housing range. Site 469 has generated numerous objections in both planning applications and the Local Plan.
Comment Ref: /Sites 469 and 009/04321/2/001
Attend Examination: Written Representation

Comment:
I would like to submit my objection to the Local Plan in its current format because this plan does not meet with the views of the local communities of Thorne & Moorends. The approach currently taken by DMBC in the Local Plan does not capture or understand the views of the Thorne Moorends community and would deprave these areas of much needed growth. It goes directly against the neighbourhood plan covering Thorne Moorends. It fails to meet the objectively assessed need and affordable housing need for Thorne Moorends. I would like to promote both sites 469 & 009 for residential development. PROPOSED CHANGE Local Plan needs to follow the neighbourhood plan.

Summary:
The Local Plan does not accord with the views of the local community of Thorne & Moorends. DMBC's approach does not capture or understand the views of the local community and would deprive these areas of much needed growth. It is in conflict with the Neighbourhood Plan and fails to meet the Objectively Assessed Need and Affordable housing need for the area. Would like to promote site 469 and 009 for development.

Response:
Site 469 and 009 are in flood zone 3. No allocations are being made anywhere in the borough in areas of flood risk and this would constitute unacceptable development in an area of flood risk.
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**Comment Ref:** C/Sites 469 and 009/04321/1/001  
**Attend Examination:** Attend Hearing  
**Reason:** The main reason I have completed this detail is due to the total disregard for the neighbourhood plan of Thorne and Moorends.  
**Area:** Chapter 16: Spatial Proposals  
**Policy:** Main Town - Thorne-Moorends

**Tests of Soundness:**  
- Positively prepared  
- Effective  
- Consistent with national  
- Legally Compliant

**Comment:**  
The Local Plan is not a true reflection of the local community desire to develop and or representative of the consultation carried out which promoted both sites 469 & 009 for residential development. It does not represent the neighbourhood plan covering Thorne Moorends. It fails to reflect the Borough Strategy (Doncaster Growing Together) and Doncaster’s Inclusive Growth Strategy. The decision to allocate no development in Moorends is contrary to the National Planning Policy Framework. The Local Plan ignores the Objectively Assessed Need and Affordable Housing Need for Moorends. opting instead to cluster Thorne and Moorends together and in the process failing to meet the needs of both. The emerging Local Plan allocates 52 hectares of employment land approximately 11% of the Boroughs total allocation within walking, cycling distance of both Thorne and Moorends and approximately 200 meters from site 469 & 800 meters of site 009 however the housing allocation for Thorne and Moorends is a meagre 5.5%. The Environment Agency have no objection to development at a finished floor level of 3.5 meters nor is there any objection from any other statutory consultee. The National Planning Policy Framework supports sustainable development site 469 & 009 are both sustainable and very close to 2 Schools, Health Centre, Children’s Centre, Community Centre, Retail Centre and Public Transport Links.  
PROPOSED CHANGE Doncaster Councils Local Plan needs to accurately reflect the needs of individual communities. It should follow the NPPF principles of sustainable development. It should let all communities’ share in Doncaster’s growth and should follow the principles of the neighbourhood plan.

**Summary:**  
The Local Plan does not a true reflection of the local community desire to developer or representative of consultation, which promoted site 469 and 009 for residential development. It does not represent the Thorne and Moorends Neighbourhood Plan, the Borough Strategy or the Inclusive Growth Strategy. Not allocating land in Moorends is contrary to the NPPF. The Local Plan ignores objectively assessed need and affordable housing need in Moorends and clusters Thorne and Moorends together and fails to meet the needs of both. There is 11% (52ha) of the boroughs employment land adjacent to Thorne and Moorends, including 469 and 009 which are within 200m of allocated employment land, however the Thorne and Moorends housing requirement is just 5.5%. The Environment Agency have no objections if floor levels are above 3.5m, and other statutory consultees have not objected. The site is sustainable and close to schools, retail and community facilities and is sustainable. Proposed change: the Local Plan should accurately reflect the needs of individual communities, follow NPPF principals of sustainable development and let all communities share in Doncaster’s growth, as well as following the principles of the neighbourhood plan.

**Response:**  
Site 469 and 009 are in flood zone 3. No allocations are being made anywhere in the borough in areas of flood risk and this would constitute unacceptable development in an area of flood risk.
I believe the Doncaster Local Plan has not been prepared in line with statutory regulations and is not fit for purpose in its current format for the following reasons:

1. The Doncaster Local Plan does not accurately represent the outcome of the local consultation process and therefore does not fairly reflect the needs/interests of the local communities it serves. Growth and development in the communities of Thorne and Moorends is supported by the majority of people who live in the area and the consultation carried out highlights this by promoting sites 469 & 009 for residential development.

2. The Doncaster Local Plan does not represent the neighbourhood plan covering the areas of Thorne & Moorends.

3. The emerging Local Plan allocates 52 hectares of employment land approximately 11% of the Borough's total allocation within walking, cycling distance of both Thorne and Moorends and approximately 200 meters from site 469 & 800 meters of site 009 however, the housing allocation for Thorne and Moorends is a disproportionate 5.5%.

4. The Environment Agency have no objection to development at a finished floor level of 3.5 meters nor is there any objection from any other statutory consultee.

5. The National Planning Policy Framework supports sustainable development and sites 469 & 009 are both sustainable and very close to 2 Schools, Health Centre, Children's Centre, Community Centre, Retail Centre and Public Transport Links. PROPOSED CHANGE - The Doncaster Local Plan requires amendment to ensure that it accurately reflects the needs/interests of the individual communities it serves.

6. The Doncaster Local Plan should follow the National Planning Policy Framework principles of sustainable development.

7. The Doncaster Local Plan should enable all communities to share in Doncaster's growth and should adhere to the principles of the neighbourhood plan.

Objects to sites 469 and 09 being rejected for allocation as housing sites. Reasons:

1. Local consultation outcomes that support sites 469 and 09 for residential development.

2. The proposed Housing allocation for Thorne and Moorends is disproportionate to the Employment land allocation. Says 52ha (11%) of Employment land allocation and 5.5% of the Housing allocation.

3. The decision to allocate no development in Moorends is contrary to the National Planning Policy Framework.

4. The decision to not allocate no development in Moorends is contrary to the NPPF (no specifics given)

5. Both sites are sustainable (in compliance with the NPPF) - close to schools/health centre/retail and public transport.

6. Flood risk: The EA have no objection to development in flood zone if floor level is set to 3.5 mt. (presume site 469) Other No other statutory consultee objects to the site (presume site 469 in relation to recent planning application)

Response:

Site 469 and 009 are in flood zone 3. No allocations are being made anywhere in the borough in areas of flood risk and this would constitute unacceptable development in an area of flood risk. Moorends is grouped with Thorne to reflect the neighbourhood Plan and Town Council boundary and between the two areas, enough housing can be delivered to get within the housing range. Site 469 has generated numerous objections in both planning applications and the Local Plan.
I believe the Doncaster Local Plan has not been prepared in line with statutory regulations and is not fit for purpose in its current format for the following reasons: - The Doncaster Local Plan does not accurately represent the outcome of the local consultation process and therefore does not fairly reflect the needs/interests of the local communities it serves. Growth and development in the communities of Thorne and Moorends is supported by the majority of people who live in the area and the consultation carried out highlights this by promoting sites 469 & 009 for residential development. - The Doncaster Local Plan does not represent the neighbourhood plan covering the areas of Thorne & Moorends. - The Doncaster Local Plan does not reflect the Borough Strategy (Doncaster Growing Together) and Doncaster’s Inclusive Growth Strategy. - The Doncaster Local Plan does not reflect the Objectively Assessed Need and Affordable Housing Need for Moorends combining the areas of Thorne and Moorends and in doing so, failing to meet the needs/interests of both communities. - The decision to allocate no development in Moorends is contrary to the National Planning Policy Framework. - The emerging Local Plan allocates 52 hectares of employment land approximately 11% of the Borough’s total allocation within walking, cycling distance of both Thorne and Moorends and approximately 200 meters from site 469 & 800 meters of site 009 however, the housing allocation for Thorne and Moorends is a disproportionate 5.5%. - The Environment Agency have no objection to development at a finished floor level of 3.5 meters nor is there any objection from any other statutory consultee. - The National Planning Policy Framework supports sustainable development and sites 469 & 009 are both sustainable and very close to 2 Schools, Health Centre, Children’s Centre, Community Centre, Retail Centre and Public Transport Links. PROPOSED CHANGE - The Doncaster Local Plan requires amendment to ensure that it accurately reflects the needs/interests of the individual communities it serves. - The Doncaster Local Plan should follow the National Planning Policy Framework principles of sustainable development. - The Doncaster Local Plan should enable all communities to share in Doncaster’s growth and should adhere to the principles of the neighbourhood plan.

Objects to sites 469 and 09 being rejected for allocation as housing sites. Reasons: Local consultation: 1. Local Plan does not reflect local consultation outcomes that support sites 469 and 09 for residential development. 2. Growth in Thorne and Moorends is supported by the local community. 3. The Local plan does not represent the Neighbourhood Plan. Local Strategies: o LP does not reflect the Borough Strategy (Doncaster Growing Together) and inclusive growth strategy - No specific reasons given. Housing figures/need: 1. The proposed Housing allocation of Thorne and Moorends is disproportionate to the Employment land allocation. Says 52ha (11%) of Employment land allocation and 5.5% of the Housing allocation. 2. LP does to reflect the objectively assessed housing need. 3. LP does not reflect the affordable housing need. 4. Combining the areas of Thorne and Moorends fails to meet the needs of both communities. NPPF 1. The decision to not allocate no development in Moorends is contrary to the NPPF (no specifics given) 2. Both sites are sustainable (in compliance with the NPPF) - close to schools/health centre/retail and public transport. Flooding risk: o The EA have no objection to development in flood zone if floor level is set to 3.5 mt. (presume site 469) Other o No other statutory consultee objects to the site (presume site 469 in relation to recent planning application)

Response:
Site 469 and 009 are in flood zone 3. No allocations are being made anywhere in the borough in areas of flood risk and this would constitute unacceptable development in an area of flood risk. Moorends is grouped with Thorne to reflect the neighbourhood Plan and Town Council boundary and between the two areas, enough housing can be delivered to get within the housing range. Site 469 has generated numerous objections in both planning applications and the Local Plan.
Tests of Soundness:

Justified

Comment:

I believe the use of this site would cause harm to the intrinsic character of the surrounding countryside, to the woodland and the foraging habitat of the area. It supports Butterflies, moths, mammals, birds, ants, bees, wasps, beetles etc. I believe there are reasonable alternatives for land to build on rather than this area. Also any houses built here would be too near the railway and cause very high noise levels for residents who would live in this area. The plans wording is not clearly written and unambiguous and can be difficult to comprehend. There should be briefer summaries to read through. PROPOSED CHANGE Briefer summaries to be more comprehensible

Summary:

'Unsound' - objects to housing allocation 510 - Adj. Thorne South Station, South End, Thorne. Development would harm the intrinsic character of the surrounding countryside and tot he woodland and foraging habitat of the area. There are other reasonable alternative sites to develop. Houses will be too close to the railway line creating noise issues for new residents. The plan's wording is not clear and unambiguous and difficult to comprehend. There should be briefer summaries to read.

Response:

Briefer summaries were produced to accompany the Site Selection Methodologies to aid understanding. Developer requirements set out what is needed when developing the site, and the site is supported in the Thorne & Moorends neighbourhood plan, however neither ecologists nor design comments raise concerns about habitat impacts or noise issues. Ecology comments request that unavoidable habitat losses are accounted for and that biodiversity net gain is demonstrated.
I believe the Doncaster Local Plan has not been prepared in line with statutory regulations and is not fit for purpose in its current format for the following reasons: - The Doncaster Local Plan does not accurately represent the outcome of the local consultation process and therefore does not fairly reflect the needs/interests of the local communities it serves. Growth and development in the communities of Thorne and Moorends is supported by the majority of people who live in the area and the consultation carried out highlights this by promoting sites 469 & 009 for residential development. - The Doncaster Local Plan does not represent the neighbourhood plan covering the areas of Thorne & Moorends. - The Doncaster Local Plan does not reflect the Borough Strategy (Doncaster Growing Together) and Doncaster’s Inclusive Growth Strategy. - The Doncaster Local Plan does not reflect the Objectively Assessed Need and Affordable Housing Need for Moorends combining the areas of Thorne and Moorends and in doing so, failing to meet the needs/interests of both communities. - The decision to allocate no development in Moorends is contrary to the National Planning Policy Framework. - The emerging Local Plan allocates 52 hectares of employment land approximately 11% of the Boroughs total allocation within walking, cycling distance of both Thorne and Moorends and approximately 200 meters from site 469 & 800 meters of site 009 however, the housing allocation for Thorne and Moorends is a disproportionate 5.5%. - The Environment Agency have no objection to development at a finished floor level of 3.5 meters nor is there any objection from any other statutory consultee. - The National Planning Policy Framework supports sustainable development and sites 469 & 009 are both sustainable and very close to 2 Schools, Health Centre, Children's Centre, Community Centre, Retail Centre and Public Transport Links. **PROPOSED CHANGE** - The Doncaster Local Plan requires amendment to ensure that it accurately reflects the needs/interests of the individual communities it serves. - The Doncaster Local Plan should follow the National Planning Policy Framework principles of sustainable development. - The Doncaster Local Plan should enable all communities to share in Doncaster's growth and should adhere to the principles of the neighbourhood plan.

**Response:**

Site 469 and 009 are in flood zone 3. No allocations are being made anywhere in the borough in areas of flood risk and this would constitute unacceptable development in an area of flood risk. Moorends is grouped with Thorne to reflect the neighbourhood Plan and Town Council boundary and between the two areas, enough housing can be delivered to get within the housing range. Site 469 has generated numerous objections in both planning applications and the Local Plan.
Comment:

I believe the Doncaster Local Plan has not been prepared in line with statutory regulations and is not fit for purpose in its current format for the following reasons: - The Doncaster Local Plan does not accurately represent the outcome of the local consultation process and therefore does not fairly reflect the needs/interests of the local communities it serves. Growth and development in the communities of Thorne and Moorends is supported by the majority of people who live in the area and the consultation carried out highlights this by promoting sites 469 & 009 for residential development. - The Doncaster Local Plan does not represent the neighbourhood plan covering the areas of Thorne & Moorends. - The Doncaster Local Plan does not reflect the Borough Strategy (Doncaster Growing Together) and Doncaster's Inclusive Growth Strategy. - The Doncaster Local Plan does not reflect the Objectively Assessed Need and Affordable Housing Need for Moorends combining the areas of Thorne and Moorends and in doing so, failing to meet the needs/interests of both communities. - The decision to allocate no development in Moorends is contrary to the National Planning Policy Framework. - The emerging Local Plan allocates 52 hectares of employment land approximately 11% of the Boroughs total allocation within walking, cycling distance of both Thorne and Moorends and approximately 200 meters from site 469 & 800 meters of site 009 however, the housing allocation for Thorne and Moorends is a disproportionate 5.5%. - The Environment Agency have no objection to development at a finished floor level of 3.5 meters nor is there any objection from any other statutory consultee. - The National Planning Policy Framework supports sustainable development and sites 469 & 009 are both sustainable and very close to 2 Schools, Health Centre, Children’s Centre, Community Centre, Retail Centre and Public Transport Links. PROPOSED CHANGE - The Doncaster Local Plan requires amendment to ensure that it accurately reflects the needs/interests of the individual communities it serves. - The Doncaster Local Plan should follow the National Planning Policy Framework principles of sustainable development. - The Doncaster Local Plan should enable all communities to share in Doncaster’s growth and should adhere to the principles of the neighbourhood plan.

Summary:

The Doncaster Local Plan does not: - Accurately represent the outcome of local consultation and the needs and interests of the local communities it serves. Most local people support growth and development and consultation highlighted that sites 469 and 009 should be allocated for development; - Represent the Thorne and Moorends neighbourhood plan; - Reflect the Borough Strategy or Inclusive Growth Strategy; - Reflect the objectively assessed needs of the area and fails to meet the interests of both communities; - Accord with the NPPF - not allocating land in Moorends is contrary to the NPPF; There is 11% (52ha) of the boroughs employment land adjacent to Thorne and Moorends, including 469 and 009 which are within 200m of allocated employment land, however the Thorne and Moorends housing requirement is just 5.5%. The Environment Agency have no objections if floor levels are above 3.5m, and other statutory consultees have not objected. The site is sustainable and close to schools, retail and community facilities and is sustainable. Proposed change: the Local Plan should accurately reflect the needs of individual communities, follow NPPF principals of sustainable development and let all communities share in Doncaster’s growth, as well as following the principles of the neighbourhood plan.

Response:

Site 469 and 009 are in flood zone 3. No allocations are being made anywhere in the borough in areas of flood risk and this would constitute unacceptable development in an area of flood risk. Moorends is grouped with Thorne to reflect the neighbourhood Plan and Town Council boundary and between the two areas, enough housing can be delivered to get within the housing range. Site 469 has generated numerous objections in both planning applications and the Local Plan.
I believe the Doncaster Local Plan has not been prepared in line with statutory regulations and is not fit for purpose in its current format for the following reasons:

- The Doncaster Local Plan does not accurately represent the outcome of the local consultation process and therefore does not fairly reflect the needs/interests of the local communities it serves. Growth and development in the communities of Thorne and Moorends is supported by the majority of people who live in the area and the consultation carried out highlights this by promoting sites 469 & 009 for residential development.
- The Doncaster Local Plan does not represent the neighbourhood plan covering the areas of Thorne & Moorends. - The Doncaster Local Plan does not reflect the Borough Strategy (Doncaster Growing Together) and Doncaster's Inclusive Growth Strategy.
- The Doncaster Local Plan does not reflect the Objectively Assessed Need and Affordable Housing Need for Moorends combining the areas of Thorne and Moorends and in doing so, failing to meet the needs/interests of both communities.
- The decision to allocate no development in Moorends is contrary to the National Planning Policy Framework.
- The emerging Local Plan allocates 52 hectares of employment land approximately 11% of the Boroughs total allocation within walking, cycling distance of both Thorne and Moorends and approximately 200 meters from site 469 & 800 meters of site 009 however, the housing allocation for Thorne and Moorends is a disproportionate 5.5%. - The Environment Agency have no objection to development at a finished floor level of 3.5 meters nor is there any objection from any other statutory consultee.

The National Planning Policy Framework supports sustainable development and sites 469 & 009 are both sustainable and very close to 2 Schools, Health Centre, Children's Centre, Community Centre, Retail Centre and Public Transport Links. PROPOSED CHANGE - The Doncaster Local Plan requires amendment to ensure that it accurately reflects the needs/interests of the individual communities it serves. The Doncaster Local Plan should follow the National Planning Policy Framework principles of sustainable development. - The Doncaster Local Plan should enable all communities to share in Doncaster's growth and should adhere to the principles of the neighbourhood plan.

Response:
Site 469 and 009 are in flood zone 3. No allocations are being made anywhere in the borough in areas of flood risk and this would constitute unacceptable development in an area of flood risk. Moorends is grouped with Thorne to reflect the neighbourhood Plan and Town Council boundary and between the two areas, enough housing can be delivered to get within the housing range. Site 469 has generated numerous objections in both planning applications and the Local Plan.
I would like to submit my objection to the Local Plan in its current format because this plan does not meet with the views of the local communities of Thorne & Moorends. The approach currently taken by DMBC in the Local Plan does not capture or understand the views of the Thorne Moorends community and would deprive these areas of much needed growth. It goes directly against the neighbourhood plan covering Thorne Moorends. It fails to meet the objectively assessed need and affordable housing need for Thorne Moorends. I would like to promote both sites 469 & 009 for residential development. PROPOSED CHANGE: Local Plan needs to follow the neighbourhood plan.

Summary:
Object to the Local Plan as it does not meet with the views of the local communities of Thorne and Moorends. DMBCs approach does not capture or understand the views of the local community and would deprive these areas of much needed growth. The plan goes against the Thorne Moorends Neighbourhood Plan. Sites 009 and 469 are promoted for residential development. Proposed change: the Local Plan should follow the Neighbourhood Plan.

Response:
Site 469 and 009 are in flood zone 3. No allocations are being made anywhere in the borough in areas of flood risk and this would constitute unacceptable development in an area of flood risk.
I believe the Doncaster Local Plan has not been prepared in line with statutory regulations and is not fit for purpose in its current format for the following reasons:

- The Doncaster Local Plan does not accurately represent the outcome of the local consultation process and therefore does not fairly reflect the needs/interests of the local communities it serves. Growth and development in the communities of Thorne and Moorends is supported by the majority of people who live in the area and the consultation carried out highlights this by promoting sites 469 & 009 for residential development.
- The Doncaster Local Plan does not represent the neighbourhood plan covering the areas of Thorne & Moorends.
- The Doncaster Local Plan does not reflect the Borough Strategy (Doncaster Growing Together) and Doncaster's Inclusive Growth Strategy.
- The Doncaster Local Plan does not reflect the Objectively Assessed Need and Affordable Housing Need for Moorends combining the areas of Thorne and Moorends and in doing so, failing to meet the needs/interests of both communities.
- The decision to allocate no development in Moorends is contrary to the National Planning Policy Framework.
- The emerging Local Plan allocates 52 hectares of employment land approximately 11% of the Boroughs total allocation within walking, cycling distance of both Thorne and Moorends and approximately 200 meters from site 469 & 800 meters of site 009 however, the housing allocation for Thorne and Moorends is a disproportionate 5.5%.

The Environment Agency have no objection to development at a finished floor level of 3.5 meters nor is there any objection from any other statutory consultee. The National Planning Policy Framework supports sustainable development and sites 469 & 009 are both sustainable and very close to 2 Schools, Health Centre, Children's Centre, Community Centre, Retail Centre and Public Transport Links. PROPOSED CHANGE - The Doncaster Local Plan requires amendment to ensure that it accurately reflects the needs/interests of the individual communities it serves. The Doncaster Local Plan should follow the National Planning Policy Framework principles of sustainable development. The Doncaster Local Plan should enable all communities to share in Doncaster's growth and should adhere to the principles of the neighbourhood plan.
C/Sites 469 and 009/05268/1/001

Name: Mr Mark Shaw

Date: 19/09/2019

Reason:

Tests of Soundness: Positively prepared Effective Legally Compliant

Justified Consistent with national

Comment:
The Local Plan is not serving the community as it should be. There is a desire to develop and grow our community from local people. There is no question that there is a lack of affordable housing in the community. The planned site of 469&009 are also very close to 2 schools, a Health centre, retail centre and public transport links.

Summary:
The Local Plan does not serve the community as it should. Local people want to see the community develop and grow. There is a lack of affordable housing in the community. Site 469 and 009 are close to schools, health centres, retail and public transport links.

Response:
Site 469 and 009 are in flood zone 3. No allocations are being made anywhere in the borough in areas of flood risk and this would constitute unacceptable development in an area of flood risk.
**Comment Ref:** C/Sites 469 and 009/05270/1/001

**Attend Examination:** Written Representation

**Reason:**

**Area:** Chapter 16: Spatial Proposals

**Policy:** Main Town - Thorne-Moorends

**Tests of Soundness:**
- Positively prepared
- Effectively
- Justified
- Consistent with national

**Comment:**

I would like to submit my objection to the Local Plan in its current format because this plan does not meet with the views of the local communities of Thorne & Moorends. The approach currently taken by DMBC in the Local Plan does not capture or understand the views of the Thorne Moorends community and would deprive these areas of much needed growth. It goes directly against the Neighbourhood plan covering Thorne Moorends. It fails to meet the objectively assessed need and affordable housing need for Thorne Moorends. I would like to promote both sites 469 & 009 for residential development. PROPOSED CHANGE Local Plan needs to follow the Neighbourhood plan.

**Summary:**

The Local Plan does not represent the views of the communities of Thorne and Moorends. DMBC's approach has not captured the views of the community and would deprive these of much needed growth. The Local Plan is contrary to the Neighbourhood Plan and does not meet the Objectively Assessed Need and affordable housing need for Thorne and Moorends. Site 469 and 009 are promoted for residential development. Proposed change: the Local Plan should follow the Neighbourhood Plan.

**Response:**

Site 469 and 009 are in flood zone 3. No allocations are being made anywhere in the borough in areas of flood risk and this would constitute unacceptable development in an area of flood risk.
I believe the Doncaster Local Plan has not been prepared in line with statutory regulations and is not fit for purpose in its current format for the following reasons:

- The Doncaster Local Plan does not accurately represent the outcome of the local consultation process and therefore does
  not fairly reflect the needs/interests of the local communities it serves. Growth and development in the communities of Thorne
  and Moorends is supported by the majority of people who live in the area and the consultation carried out highlights this
  by promoting sites 469 & 009 for residential development.
- The Doncaster Local Plan does not represent the neighbourhood plan covering the areas of Thorne & Moorends.
- The Doncaster Local Plan does not reflect the Borough Strategy (Doncaster Growing Together) and Doncaster’s Inclusive
  Growth Strategy.
- The Doncaster Local Plan does not reflect the Objectively Assessed Need and Affordable Housing Need for Moorends
  combining the areas of Thorne and Moorends and in doing so, failing to meet the needs/interests of both communities.
- The decision to allocate no development in Moorends is contrary to the National Planning Policy Framework.
- The emerging Local Plan allocates 52 hectares of employment land approximately 11% of the Boroughs total allocation
  within walking, cycling distance of both Thorne and Moorends and approximately 200 meters from site 469 & 800 meters of
  site 009 however, the housing allocation for Thorne and Moorends is a disproportionate 5.5%.
- The Environment Agency have no objection to development at a finished floor level of 3.5 meters nor is there any
  objection from any other statutory consultee.
- The National Planning Policy Framework supports sustainable development and sites 469 & 009 are both sustainable
  and very close to 2 Schools, Health Centre, Children’s Centre, Community Centre, Retail Centre and Public Transport Links.
- PROPOSED CHANGE - The Doncaster Local Plan requires amendment to ensure that it accurately reflects the needs/interests
  of the individual communities it serves.
- The Doncaster Local Plan should follow the National Planning Policy Framework principles of sustainable development.
- The Doncaster Local Plan should enable all communities to share in Doncaster’s growth and should adhere to the
  principles of the neighbourhood plan.

Summary:

The Doncaster Local Plan does not:

- Accurately represent the outcome of local consultation and the needs and interests of the local communities it
  serves. Most local people support growth and development and consultation highlighted that sites 469 and 009 should be
  allocated for development;
- Represent the Thorne and Moorends neighbourhood plan;
- Reflect the Borough Strategy or Inclusive Growth Strategy;
- Reflect the objectively assessed needs of the area and fails to meet the interests of both communities;
- Accord with the NPPF - not allocating land in Moorends is contrary to the NPPF; There is 11% (52ha) of the boroughs
  employment land adjacent to Thorne and Moorends, including 469 and 009 which are within 200m of allocated employment
  land, however the Thorne and Moorends housing requirement is just 5.5%.
- The Environment Agency have no objections if floor levels are above 3.5m, and other statutory consultees have not
  objected. The site is sustainable and close to schools, retail and community facilities and is sustainable.
- Proposed change: the Local Plan should accurately reflect the needs of individual communities, follow NPPF
  principals of sustainable development and let all communities share in Doncaster's growth, as well as following the
  principles of the neighbourhood plan.

Response:

Site 469 and 009 are in flood zone 3. No allocations are being made anywhere in the borough in areas of flood risk and this
would constitute unacceptable development in an area of flood risk.
C/Sites 469 and 009/05275/1/001

Mrs Margaret Carver

23/09/2019

Positively prepared

Effective

Justified

Consistent with national

Written Representation

Chapter 16: Spatial Proposals

Main Town - Thorne-Moorends

1. The Local Plan should accurately reflect local consultation outcomes and in doing so be a true reflection of the needs/interests of the community it serves which this plan does not achieve. Growth and development in this area is supported by the majority of people who live in the community and the consultation carried out highlights this by promoting both sites 469 & 009 for residential development. 2. The Local Plan does not represent the neighbourhood plan covering Thorne & Moorends. 3. The Local Plan does not reflect the Borough Strategy (Doncaster Growing Together) and Doncaster’s Inclusive Growth Strategy. 4. The decision to allocate no development in Moorends is contrary to the National Planning Policy Framework. 5. The Local Plan does not reflect the Objectively Assessed Need and Affordable Housing Need for Moorends combining the areas of Thorne and Moorends and in doing so, failing to meet the needs/interests of both communities. 6. The emerging Local Plan allocates 52 hectares of employment land approximately 11% of the Boroughs total allocation within walking, cycling distance of both Thorne and Moorends and approximately 200 meters from site 469 & 800 meters of site 009 however, the housing allocation for Thorne and Moorends is a disproportionate 5.5%. 7. The Environment Agency have no objection to development at a finished floor level of 3.5 meters nor is there any objection from any other statutory consultee. 8. The National Planning Policy Framework supports sustainable development site 469 & 009 are both sustainable and very close to 2 Schools, Health Centre, Children’s Centre, Community Centre, Retail Centre and Public Transport Links. PROPOSED CHANGE 1. Doncaster Councils Local Plan should be changed to accurately reflect the needs of the individual communities it serves. 2. The Local Plan should follow the National Planning Policy Framework principles of sustainable development. 3. The Local Plan should enable all communities to share in Doncaster’s growth and should follow the principles of the neighbourhood plan.

Objects to sites 469 and 09 being rejected for allocation as housing sites. Reasons: 1. Local Plan does not reflect local consultation outcomes that support sites 469 and 09 for residential development. 2. LP does not reflect the Borough Strategy (Doncaster Growing Together) and inclusive growth strategy - No specific reasons given. 3. No development Moorends is contrary to the NPPF - No specific reasons given. 4. LP does to reflect the objectively assessed housing need. 5. LP does not reflect the affordable housing need. 6. Combining the areas of Thorne and Moorends fails to meet the needs of both communities. 7. The proposed Housing allocation of Thorne and Moorends is disproportionate to the Employment land allocation. Says 52ha (11%) of Employment land allocation and 5.5% of the Housing allocation. 8. The EA have no objection to development in flood zone if floor level is set to 3.5 mt. (presume site 469) 9. No other statutory consultee objects to the site (presume site 469) 10. Both sites are sustainable - close to schools/health centre/retail and public transport. 11. LP should enable all communities to share growth. 12. LP should follow the principles of the Neighbourhood Plan.

Response:

Site 469 and 009 are in flood zone 3. No allocations are being made anywhere in the borough in areas of flood risk and this would constitute unacceptable development in an area of flood risk.
Comment Ref: C/Sites 469 and 009/05276/1/001

Name: Mr Roy Carver

CUSREF: 05276

Date: 23/09/2019

Representing:

Comment Ref: C/Sites 469 and 009/05276/1/001

Attend Examination: Written Representation

Reason:

Area: Chapter 16: Spatial Proposals

Policy: Main Town - Thorne-Moorends

Tests of Soundness: Positively prepared Justified Effective Consistent with national

Comment:

1. The Local Plan should accurately reflect local consultation outcomes and in doing so be a true reflection of the needs/interests of the community it serves which this plan does not achieve. Growth and development in this area is supported by the majority of people who live in the community and the consultation carried out highlights this by promoting both sites 469 & 009 for residential development. 2. The Local Plan does not represent the neighbourhood plan covering Thorne & Moorends. 3. The Local Plan does not reflect the Borough Strategy (Doncaster Growing Together) and Doncaster’s Inclusive Growth Strategy. 4. The decision to allocate no development in Moorends is contrary to the National Planning Policy Framework. 5. The Local Plan does not reflect the Objectively Assessed Need and Affordable Housing Need for Moorends combining the areas of Thorne and Moorends and in doing so, failing to meet the needs/interests of both communities. 6. The emerging Local Plan allocates 52 hectares of employment land approximately 11% of the Boroughs total allocation within walking, cycling distance of both Thorne and Moorends and approximately 200 meters from site 469 & 800 meters of site 009 however, the housing allocation for Thorne and Moorends is a disproportionate 5.5%. 7. The Environment Agency have no objection to development at a finished floor level of 3.5 meters nor is there any objection from any other statutory consultee. 8. The National Planning Policy Framework supports sustainable development site 469 & 009 are both sustainable and very close to 2 Schools, Health Centre, Children’s Centre, Community Centre, Retail Centre and Public Transport Links. PROPOSED CHANGE 1. Doncaster Councils Local Plan should be changed to accurately reflect the needs of the individual communities it serves. 2. The Local Plan should follow the National Planning Policy Framework principles of sustainable development. 3. The Local Plan should enable all communities to share in Doncaster’s growth and should follow the principles of the neighbourhood plan.

Summary:

Objects to sites 469 and 09 being rejected for allocation as housing sites. Reasons: 1. Local Plan does not reflect local consultation outcomes that support sites 469 and 09 for residential development. 2. LP does not reflect the Borough Strategy (Doncaster Growing Together) and inclusive growth strategy - No specific reasons given. 3. No development Moorends is contrary to the NPPF - No specific reasons given. 4. LP does to reflect the objectively assessed housing need. 5. LP does not reflect the affordable housing need. 6. Combining the areas of Thorne and Moorends fails to meet the needs of both communities. 7. The proposed Housing allocation of Thorne and Moorends is disproportionate to the Employment land allocation. Says 52ha (11%) of Employment land allocation and 5.5% of the Housing allocation. 8. The EA have no objection to development in flood zone if floor level is set to 3.5 mt. (presume site 469) 9. No other statutory consultee objects to the site (presume site 469) 10. Both sites are sustainable - close to schools/health centre/retail and public transport. 11. LP should enable all communities to share growth. 12. LP should follow the principles of the Neighbourhood Plan.

Response:

Site 469 and 009 are in flood zone 3. No allocations are being made anywhere in the borough in areas of flood risk and this would constitute unacceptable development in an area of flood risk.
If I read this correctly you are asking for resubmission of any call for sites information submitted in 2014. There are two sites (adjacent to each other) which I feel should be taken forward into the next development plan. I have attached location plans (2) and copies of the original call for sites forms (2) which were submitted in 2014. The areas concerned are one of the few sites (and possibly the only sites) within Thorne & Moorends which are in Flood Zone 1. The areas are very close to the Town Centre. The areas have both previously been allocated as Residential Land in the UDP (1989?). Why have they not previously been developed? There are several historic reasons, but none which would prevent development now. We considered an application some time ago but the land was judged to be subject to the Greenfield Moratorium. (wrongly in my view but it matters little now). We were then told that the Council would not accept an outline application because the land neighbours (but is not within) the Thorne Conservation area. We did not want to risk making a full application (which would have to be detailed and expensive) without the comfort of knowing that the land would be allocated for housing. I can’t see why a Council would not accept a red-line outline application with all matters reserved, as the council still have control over all matters (including density and external appearance) but that is how it was. I did not argue the point - at least, not for too long. We then became otherwise engaged in building a LIDL supermarket on another piece of (immediately) adjacent land. This large retail store is now complete and trading and has made a valuable addition to the Thorne Town Centre retail offer. After that we started (and are now almost complete) on a small, very high-quality, residential development in Lock Lane, Thorne. These two sites should be our next project. The town council very much are in favour of these sites being developed (refer to Cllr S, Durant). I would request that they be included in the forthcoming development plan. We would like to keep an option open on the larger area for another retail development but for the most part the areas would be housing sites. (SEE EMAIL FOR PLANS)

Promoting 2 sites in Thorne for residential use. Both off St Nicholas Road Thorne. Site Ref:133 (proposed for allocation) as well as Site Ref:283 (Rejected). States that the Town Council is supportive of these proposed developments. Is considering the option of some retail development on site 133.

Support for allocation of Site Ref:133 is welcomed. Site Ref:283 is rejected as the site was considered and assessed through the Thorne-Moorends Neighbourhood Plan but it was rejected on the grounds of too much loss of trees. The site is designated as Residential Policy Area in the Local Plan which could allow some small scale development is policies in the plan can be met, including those in relation to loss of trees.
5.1 The subject site (and wider Thorne/Moorends settlement) has long been recognised as a sustainable location for growth. The Draft Sites and Policies DPD, 2014 identified the northern and southern section of the subject site as a residential allocation (Appendix 02). Clearly, at the point of the proposed allocation it was known that the sites were within Flood Zone 3 but the Council proposed to allocate the sites for housing despite this designation. (SEE EMAIL FOR Appendices) 5.2 The Housing and Economic Land Availability Assessments (2018) identifies the full site as available, deliverable & developable within the first 6-10 years, capable of supporting 754 units and suitable for development but with national policy or physical constraints. It is considered that this constraint can be overcome in respect of flood risk, similar to other proposed housing allocations within Thorne.  

Overview 5.3 The subject site, which comprises an irregular piece of agricultural land measuring 32 ha in size, is located off Marshland Road, between the settlements of Thorne and Moorends. It is surrounded by residential land uses to the east and employment land uses to the west. Ferndale Drive residential area is located to the immediate north-east of the site, with the wider Moorends residential area beyond. A large employment corridor runs in a north-east to southwest direction (parallel with the nearby M18) to the west of the site.  

5.4 The site is extremely well positioned from a transport perspective, with the M18 just 540 metres to the west and Thorne North Railway Station just 1 kilometre to the south west. Indeed, Thorne is the only settlement outside of the Main Urban Area to have two train stations. The site is also within walking distance of both the Moorends and Thorne High Streets.  

5.5 Vehicular access is available from both the north (Bloomhill Road) and east (Marshland Road) of the site and from the south from Lands End Road/Alexandra Street and potentially Ivy Road. Vehicular access is also available from Willow Avenue to the east of Ivy Road and also Ferndale Drive at the North East of the site.  

5.6 The River Don is located approximately 1.1 km west of the site. This river flows in a northerly/north-easterly direction to its confluence with the River Ouse at Goole approximately 10.0 km north-east of the site.  

5.7 In policy terms, the site is located within the Countryside and therefore is in a sustainable location which can deliver new housing on a non-Green Belt site. Sustainability 5.8 As noted above, both the Council and the Thorne and Moorends Town Council have previously recognised the northern and southern section of the subject site as a sustainable location for the delivery of houses. The site’s potential to support new housing was initially acknowledged through the allocation of the site under the Sites and Policies DPD (2014) allocated the northern and southern section of the site to meet Thorne/Moorends strategic housing requirements.  

5.9 The Council has also continued to recognise the wider Thorne/Moorends settlement as one of the most sustainable locations for housing within the Borough: "Thorne & Moorends is one of the best scoring settlements against the Settlement Audit criteria?The combined population is 17,295, and the settlement is one of only three in the borough to have a town centre, which serves a wider catchment than just the town itself? Thorne and Moorends is the only settlement in the borough (outside of the Main Urban Area) to have two train stations’ (Settlement Profiles, Local Plan Evidence Base) Flood Risk 5.10 The draft Local Plan recognises that over two fifths of the Borough is located within areas at a medium to high risk of flooding from both the river Don and Trent catchments (Paragraph 2.26). This includes Main Towns such as Thorne which is considered to be in a very sustainable locations for development and are otherwise appropriate locations for growth in line with wider spatial planning objectives.  

5.11 Furthermore, in respect of Thorne the Council state: The Local Plan housing allocation at the Main Town of Thorne-Moorends is constrained by a lack of potential development sites not at high risk of flooding. Although sufficient sites have been identified to meet the town’s local needs housing, and some economic-growth led housing as well, were it not for this physical constraint to plan-making then the Main Town would have seen an allocation towards the top of the growth range. This is due to the town’s size and population as being one of our largest communities outside of the Main Urban Area with strong sustainability credentials, for example: 2 train stations; frequent bus links; large town centre with excellent range of services and facilities; and no Green Belt constraints to growth. (Paragraph 16.142)  

5.12 Despite the suitability of the subject site and the settlement, the Council has not identified the subject site as a preferred location for housing within the local plan. The Council has instead chosen to dismiss this site on flood risk grounds.  

5.13 Don Parkinson has met with the Environment Agency (EA) to discuss the proposed housing development of the subject site. The EA is satisfied that if appropriate finished floor levels can be achieved on site then the proposals could be delivered satisfactorily to address any flood risk concerns. The scale of the subject site is such that an increase in floor levels to +3.5m AOD can be achieved without any negative impact in townscape terms. Don Parkinson is currently instructing further modelling work to support an application for residential development on the subject site, which is likely to indicate floor levels lower than a +3.5mAOD increase can be achieved.  

5.14 It is considered that the Council should review the application of the Sequential Test in relation to the proposed allocation of sites for residential development within Thorne. Whilst it is accepted that some sites have prepared site specific Flood Risk Assessments and passed the Sequential Test, a number of the Thorne sites were scored similar to the subject site within the Level 1 Strategic Flood Risk Assessment. As such, it is considered that there should be the opportunity through the local plan process for other sustainable sites, such as the subject site, to demonstrate it can overcome flood risk issues and be allocated for housing development to:  

1 Ensure that the Council has fully explored the extent of non-Green belt land available for development before releasing Green Belt land; and  

2 Ensure that Thorne is allowed to grow in line with the settlement hierarchy and the Council’s own consideration of the proportion of growth that should rightly be apportioned to the town.  

Summary 5.15 The Publication Draft Plan is not positively prepared as it fails to provide the required housing allocations to meet a NPPF-compliant Plan period. Nor does it allocate sufficient land to meet the borough’s housing requirement. The draft Plan is unsound on the
basis of its failure to give full consideration to the growth potential of Thorne as one of the borough's most sustainable locations and has failed to comply with NPPF by not considering non-Green Belt land before allocating substantive areas of Green Belt for development. The absence of the subject site as an allocation for housing development is a failure of the draft Local Plan. 5.16 The subject site represents a wholly sustainable location for growth for the following reasons: - The site is situated within one of Doncaster's Main Towns and is thus a location within which there is strong policy support for future growth - The site is located outside of the Green Belt and its allocation will reduce the need to seek to allocate additional housing sites which are located within the Green Belt, in accordance with the NPPF. - The site is well-contained and represents an excellent example of a rounding-off edge of settlement housing site being bounded by existing residential development to the north, east and south and the railway line to the west. - The site is well-connected to the existing settlement centres of Thorne and Moorends by both road and by foot. - There is a technical solution (raised finished floor levels) to the sites flood zone designation that would overcome floor risk concerns that would prevent this site from being developed. Discussions are ongoing with the EA in respect of this matter. - The site is of a size and location capable of supporting a sustainable and viable mix of housing types, tenures and sizes.

Summary:

The subject site (northern and southern section) was a housing allocation in the Sites and Policies DPD even though it was known it is in Flood Zone 3. The HELAA identifies the full site as available, deliverable & developable within the first 6-10 years, capable of supporting 754 units and suitable for development but with national policy or physical constraints. The flood risk constrain can be overcome. The site is an irregular piece of agricultural land measuring 32 ha in size. It is located off Marshland Road, between Thorne and Moorends and is surrounded by residential land uses to the east and employment land uses to the west. A large employment corridor runs in a north-east to southwest direction to the west of the site. It is extremely well positioned with the M18 to the west and Thorne North Railway Station to the south west. It is within walking distance of Moorends and Thorne High Streets. Vehicular access is available from both the north, east and south. The site is within the Countryside and therefore in a sustainable location which can deliver new housing on a non-Green Belt site. Regarding flood risk, the Local Plan recognises that over two fifths of the Borough is located within areas at a medium to high risk of flooding. This includes Main Towns such as Thorne which is considered to be in a very sustainable locations for development. Paragraph 16.142 of the Local Plan states that the ?housing allocation at Thorne-Moorends is constrained by a lack of potential development sites not at high risk of flooding and that although sufficient sites have been identified to meet the town's local needs housing, and some economic-growth led housing as well, were it not for this physical constraint to plan-making then the Main Town would have seen an allocation towards the top of the growth range.7 Despite the suitability of the site and the settlement, the site has not identified as a housing allocation but instead been dismissed on flood risk grounds. However discussions are taking place with the Environment Agency and they are satisfied that if appropriate finished floor levels can be achieved then the proposals could be delivered satisfactorily to address any flood risk concerns. An increase in floor levels to +3.5m AOD can be achieved without any negative impact in townscape terms. Further modelling work has been instructed to support an application for residential development on the subject site, which is likely to indicate floor levels lower than a +3.5mAOD increase can be achieved. The application of the flood Risk Sequential Test should be reviewed. Some sites have prepared site specific Flood Risk Assessments and passed the Sequential Test therefore there should an opportunity for other sustainable sites to demonstrate that flood risk issues can be overcome. This would then: 1. Ensure that the Council has fully explored the extent of non-Green belt land available for development before releasing Green Belt land; and 2. Ensure that Thorne is allowed to grow in line with the settlement hierarchy and the Council's own consideration of the proportion of growth that should rightly be apportioned to the town. In summary, the Publication Draft Plan is not positively prepared as it fails to provide the required housing allocations to meet a NPPF-compliant Plan period. It does it allocate sufficient land to meet the borough's housing requirement and is unsound as it has failed to give full consideration to the growth potential of Thorne. It has failed to comply with the NPPF by not considering non-Green Belt land before allocating substantive areas of Green Belt for development. The absence of the subject site as an allocation for housing development is a failure of the Local Plan. The site represents a wholly sustainable location for growth for the following reasons: - It is situated within one of Doncaster's Main Towns and is a location with strong policy support for future growth; - It is outside the Green Belt and its allocation will reduce the need to allocate additional housing sites which are located within the Green Belt; - It is well-contained and is an example of a rounding-off edge of settlement housing site; - It well-connected to the existing settlement centres of Thorne and Moorends; - There is a technical solution to the site's flood zone designation that would overcome flood risk concerns. - It is of a size and location capable of supporting a sustainable and viable mix of housing types, tenures and sizes.

Response:

No new sites are being allocated in Flood Zone 3, in line with national policy. This approach is supported by the Environment Agency. This is an entirely new plan and so the Sites and Policies DPD is irrelevant to emerging Local Plan site selection. Although Thorne & Moorends does not reach the top of its housing range, it does comfortably get within it, and overall the borough an deliver the required amount of housing. The idea of ranges is that some areas can deliver more, some less (depending on local circumstances) and overall this balances out. The Green Belt Topic Paper demonstrates how the issue of flood risk in the borough was carefully considered when considering to release Green Belt land. Overall Green Belt release is relatively modest and only taken where exceptional circumstances can be demonstrated, as shown in the Green Belt Topic Paper.
Comment:

4.4 Draft Policy 6 identifies the proposed housing allocation which will deliver the housing requirement during the plan period. The proposed allocations are detailed within Tables H1 and H2 of the local plan and identify allocations with and without planning permission. The distribution of housing is considered to be based on the settlement hierarchy set out within Draft Policy 3. As drafted, Don Parkinson considers that the policy is unsound and is not consistent with national policy. The local plan is proposing to allocate a number of sites (without planning permission) currently in the Green Belt (including Site refs. 033, 115, 040, 501, 777, 141, 165/186, 929, 1028) before considering other sustainable sites located outside of the Green Belt (NPFF paragraphs 135, 136, 137). 4.5 Whilst Don Parkinson accept that Green Belt land will need to be released to support the future housing needs of Doncaster, it is considered these sites should only come forward and Green belt land released after the opportunities to allocate and develop on non-Green Belt land have been exhausted. 4.6 It is considered that the Council must seek to allocate additional housing on Countryside land in the first instance, particularly in sustainable locations, where the current levels of housing allocation fall short of the Plan's own growth expectations under the terms of the settlement hierarchy. The distribution of additional dwellings should follow the Council's settlement hierarchy and therefore consider further housing allocations within Main Towns such as Thorne. Don Parkinson is promoting a site within a sustainable location, which can help deliver additional housing on non-Green Belt land located on the edge of and well-related to a sustainable Main Town settlement. Further details are provided within Section 5 below.

Summary:

Policy 6 is unsound and not consistent with national policy. There are a number of allocated sites which are in the Green Belt and these have been considered before other sustainable sites outside of the Green belt. It is accepted that Green Belt release is needed but these sites should only come forward after opportunities on non-Green Belt land have been exhausted. The Council must seek to allocate additional countryside for housing in the first instance where the current levels of housing allocations fall short of the plans own growth expectations. The distribution of additional dwellings should follow the settlement hierarchy and consider further housing allocations within the Main Towns such as the site in question.

Response:

Green Belt release must be considered in the context of the need to deliver the agreed spatial strategy which aims to spread housing growth across the borough. Focussing solely on non - Green Belt and non - flood risk sites in reality results in a potential over focus on the south east of the borough, and a skewed development pattern. The Green Belt Topic Paper explores this, but a relatively small amount of Green Belt land is required in the borough, and only in locations where exceptional circumstances are justified, as set out in the Topic Paper. In the event of a failure to demonstrate a 5 year supply, Policy 2 sets out that countryside development may be acceptable, subject to caveats.
5.1 The subject site (and wider Thorne/Moorends settlement) has long been recognised as a sustainable location for growth. The Draft Sites and Policies DPD, 2014 identified the northern and southern section of the subject site as a residential allocation (Appendix 02). Clearly, at the point of the proposed allocation it was known that the sites were within Flood Zone 3 but the Council proposed to allocate the sites for housing despite this designation. (SEE EMAIL FOR Appendices) 5.2 The Housing and Economic Land Availability Assessments (2018) identifies the full site as available, deliverable & developable within the first 6-10 years, capable of supporting 754 units and suitable for development but with national policy or physical constraints. It is considered that this constraint can be overcome in respect of flood risk, similar to other proposed housing allocations within Thorne. 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Sustainability 5.8 As noted above, both the Council and the Thorne and Moorends Town Council have previously recognised the northern and southern section of the subject site as a sustainable location for the delivery of houses. The site’s potential to support new housing was initially acknowledged through the allocation of the site under the Sites and Policies DPD (2014) allocated the northern and southern section of the site to meet Thorne/Moorends strategic housing requirements. 5.9 The Council has also continued to recognise the wider Thorne/Moorends settlement as one of the most sustainable locations for housing within the Borough: "Thorne & Moorends is one of the best scoring settlements against the Settlement Audit criteria?The combined population is 17,295, and the settlement is one of only three in the borough to have a town centre, which serves a wider catchment than just the town itself? 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Although sufficient sites have been identified to meet the town's local needs housing, and some economic-growth led housing as well, were it not for this physical constraint to plan-making then the Main Town would have seen an allocation towards the top of the growth range. This is due to the town’s size and population as being one of our largest communities outside of the Main Urban Area with strong sustainability credentials, for example: 2 train stations; frequent bus links; large town centre with excellent range of services and facilities; and no Green Belt constraints to growth. (Paragraph 14.142) 5.12 Despite the suitability of the subject site and the settlement, the Council has not identified the subject site as a preferred location for housing within the local plan. The Council has instead chosen to dismiss this site on flood risk grounds. 5.13 Don Parkinson has met with the Environment Agency (EA) to discuss the proposed housing development of the subject site. 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As such, it is considered that there should be the opportunity through the local plan process for other sustainable sites, such as the subject site, to demonstrate it can overcome flood risk issues and be allocated for housing development to: 1 Ensure that the Council has fully explored the extent of non-Green belt land available for development before releasing Green Belt land; and 2 Ensure that Thorne is allowed to grow in line with the settlement hierarchy and the Council’s own consideration of the proportion of growth that should rightly be apportioned to the town. Summary 5.15 The Publication Draft Plan is not positively prepared as it fails to provide the required housing allocations to meet a NPPF-compliant Plan period. Nor does it allocate sufficient land to meet the borough’s housing requirement. The draft Plan is unsound on the
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Comment Ref: C/Policy 6/05296/1/007

Attend Examination: Attend Hearing

Reason: To fully represent our clients land interest and respond to matters that may be raised at the hearing sessions. Please refer to accompanying representation 'Doncaster Local Plan Representations to Draft Doncaster Local Plan - Publication Draft' (September 2019) on behalf of Don Parkinson Partnership (doc ref. 60752/01/JG/AK).

Area: Chapter 16: Spatial Proposals

Policy: Main Town - Thorne-Moorends

Tests of Soundness: Positively prepared Justified Effective Legally Compliant Consistent with national

Comment:

4.4 Draft Policy 6 identifies the proposed housing allocation which will deliver the housing requirement during the plan period. The proposed allocations are detailed within Tables H1 and H2 of the local plan and identify allocations with and without planning permission. The distribution of housing is considered to be based on the settlement hierarchy set out within Draft Policy 3. As drafted, Don Parkinson considers that the policy is unsound and is not consistent with national policy. The local plan is proposing to allocate a number of sites (without planning permission) currently in the Green Belt (including Site refs. 033, 115, 040, 501, 777, 141, 165/186, 929, 1028) before considering other sustainable sites located outside of the Green Belt (NPFF paragraphs 135, 136, 137). 4.5 Whilst Don Parkinson accept that Green Belt land will need to be released to support the future housing needs of Doncaster, it is considered these sites should only come forward and Green belt land released after the opportunities to allocate and develop on non-Green Belt land have been exhausted. 4.6 It is considered that the Council must seek to allocate additional housing on Countryside land in the first instance, particularly in sustainable locations, where the current levels of housing allocation fall short of the Plan's own growth expectations under the terms of the settlement hierarchy. The distribution of additional dwellings should follow the Council's settlement hierarchy and therefore consider further housing allocations within Main Towns should as Thorne. Don Parkinson is promoting a site within a sustainable location, which can help deliver additional housing on non-Green Belt land located on the edge of and well-related to a sustainable Main Town settlement. Further details are provided within Section 5 below.

Summary:

Policy 6 is unsound and not consistent with national policy. There are a number of allocated sites which are in the Green Belt and these have been considered before other sustainable sites outside of the Green belt. It is accepted that Green Belt release is needed but these sites should only come forward after opportunities on non-Green Belt land have been exhausted. The Council must seek to allocate additional countryside for housing in the first instance where the current levels of housing allocations fall short of the plans own growth expectations. The distribution of additional dwellings should follow the settlement hierarchy and consider further housing allocations within the Main Towns such as the site in question.

Response:

Green Belt release must be considered in the context of the need to deliver the agreed spatial strategy which aims to spread housing growth across the borough. Focussing solely on non - Green Belt and non - flood risk sites in reality results in a potential over focus on the south east of the borough, and a skewed development pattern. The Green Belt Topic Paper explores this, but a relatively small amount of Green Belt land is required in the borough, and only in locations where exceptional circumstances are justified, as set out in the Topic Paper. In the event of a failure to demonstrate a 5 year supply, Policy 2 sets out that countryside development may be acceptable, subject to caveats.
5.1 The subject site (and wider Thorne/Moorends settlement) has long been recognised as a sustainable location for growth. The Draft Sites and Policies DPD, 2014 identified the northern and southern section of the subject site as a residential allocation (Appendix 02). Clearly, at the point of the proposed allocation it was known that the sites were within Flood Zone 3 but the Council proposed to allocate the sites for housing despite this designation. (SEE EMAIL FOR Appendices) 5.2 The Housing and Economic Land Availability Assessments (2018) identifies the full site as available, deliverable & developable within the first 6-10 years, capable of supporting 754 units and suitable for development but with national policy or physical constraints. It is considered that this constraint can be overcome in respect of flood risk, similar to other proposed housing allocations within Thorne. Overview 5.3 The subject site, which comprises an irregular piece of agricultural land measuring 32 ha in size, is located off Marshland Road, between the settlements of Thorne and Moorends. It is surrounded by residential land uses to the east and employment land uses to the west. Ferndale Drive residential area is located to the immediate north-east of the site, with the wider Moorends residential area beyond. A large employment corridor runs in a north-east to south-west direction (parallel with the nearby M18) to the west of the site. 5.4 The site is extremely well positioned from a transport perspective, with the M18 just 540 metres to the west and Thorne North Railway Station just 1 kilometre to the south west. Indeed, Thorne is the only settlement outside of the Main Urban Area to have two train stations. The site is also within walking distance of both the Mooernds and Thorne High Streets. 5.5 Vehicular access is available from both the north (Bloomhill Road) and east (Marshland Road) of the site and from the south from Lands End Road/Alexandra Street and potentially Ivy Road. Vehicular access is also available from Willow Avenue to the east of Ivy Road and also Ferndale Drive at the North East of the site. 5.6 The River Don is located approximately 1.1 km west of the site. This river flows in a northerly/north-easterly direction to its confluence with the River Ouse at Goole approximately 10.0 km north-east of the site. 5.7 In policy terms, the site is located within the Countryside and therefore is in a sustainable location which can deliver new housing on a non-Green Belt site. Sustainability 5.8 As noted above, both the Council and the Thorne and Moorends Town Council have previously recognised the northern and southern section of the subject site as a sustainable location for the delivery of houses. The site’s potential to support new housing was initially acknowledged through the allocation of the site under the Sites and Policies DPD (2014) allocated the northern and southern section of the site to meet Thorne/Moorends strategic housing requirements. 5.9 The Council has also continued to recognise the wider Thorne/Moorends settlement as one of the most sustainable locations for housing within the Borough: "Thorne & Moorends is one of the best scoring settlements against the Settlement Audit criteria?The combined population is 17,295, and the settlement is one of only three in the borough to have a town centre, which serves a wider catchment than just the town itself? Thorne and Moorends is the only settlement in the borough (outside of the Main Urban Area) to have two train stations" (Settlement Profiles, Local Plan Evidence Base) Flood Risk 5.10 The draft Local Plan recognises that over two fifths of the Borough is located within areas at a medium to high risk of flooding from both the river Don and Trent catchments (Paragraph 2.26). This includes Main Towns such as Thorne which is considered to be in a very sustainable locations for development and are otherwise appropriate locations for growth in line with wider spatial planning objectives. 5.11 Furthermore, in respect of Thorne the Council state: The Local Plan housing allocation at the Main Town of Thorne-Moorends is constrained by a lack of potential development sites not at high risk of flooding. Although sufficient sites have been identified to meet the town's local needs housing, and some economic-growth led housing as well, were it not for this physical constraint to plan-making then the Main Town would have seen an allocation towards the top of the growth range. This is due to the town’s size and population as being one of our largest communities outside of the Main Urban Area with strong sustainability credentials, for example: 2 train stations; frequent bus links; large town centre with excellent range of services and facilities; and no Green Belt constraints to growth. (Paragraph 16.142) 5.12 Despite the suitability of the subject site and the settlement, the Council has not identified the subject site as a preferred location for housing within the local plan. The Council has instead chosen to dismiss this site on flood risk concerns. 5.13 Don Parkinson has met with the Environment Agency (EA) to discuss the proposed housing development of the subject site. The EA is satisfied that if appropriate finished floor levels can be achieved on site then the proposals could be delivered satisfactorily to address any flood risk concerns. The site is not shown as at risk of flooding but rather is at a medium to high flood risk. However, the EA is satisfied that if appropriate finished floor levels can be achieved on site then the proposals could be delivered satisfactorily to address any flood risk concerns. The EA is satisfied that if appropriate finished floor levels can be achieved on site then the proposals could be delivered satisfactorily to address any flood risk concerns. The EA is satisfied that if appropriate finished floor levels can be achieved on site then the proposals could be delivered satisfactorily to address any flood risk concerns. The EA is satisfied that if appropriate finished floor levels can be achieved on site then the proposals could be delivered satisfactorily to address any flood risk concerns. 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basis of its failure to give full consideration to the growth potential of Thorne as one of the borough's most sustainable locations and has failed to comply with NPPF by not considering non-Green Belt land before allocating substantive areas of Green Belt for development. The absence of the subject site as an allocation for housing development is a failure of the draft Local Plan. 5.16 The subject site represents a wholly sustainable location for growth for the following reasons: - The site is situated within one of Doncaster's Main Towns and is thus a location within which there is strong policy support for future growth - The site is located outside of the Green Belt and its allocation will reduce the need to seek to allocate additional housing sites which are located within the Green Belt, in accordance with the NPPF. - The site is well-contained and represents an excellent example of a rounding-off edge of settlement housing site being bounded by existing residential development to the north, east and south and the railway line to the west. - The site is well-connected to the existing settlement centres of Thorne and Moorends by both road and by foot. - There is a technical solution (raised finished floor levels) to the sites flood zone designation that would overcome floor risk concerns that would prevent this site from being developed. Discussions are ongoing with the EA in respect of this matter. - The site is of a size and location capable of supporting a sustainable and viable mix of housing types, tenures and sizes.

Summary:
The subject site (northern and southern section) was a housing allocation in the Sites and Policies DPD even though it was known it is in Flood Zone 3. The HELAA identifies the full site as available, deliverable & developable within the first 6-10 years, capable of supporting 754 units and suitable for development but with national policy or physical constraints. The flood risk constrain can be overcome. The site is an irregular piece of agricultural land measuring 32 ha in size. It is located off Marshland Road, between Thorne and Moorends and is surrounded by residential land uses to the east and employment land uses to the west. A large employment corridor runs in a north-east to southwest direction to the west of the site. It is extremely well positioned with the M18 to the west and Thorne North Railway Station to the south west. It is within walking distance of Moorends and Thorne High Streets. Vehicular access is available from both the north, east and south. The site is within the Countryside and therefore in a sustainable location which can deliver new housing on a non-Green Belt site. Regarding flood risk, the Local Plan recognises that over two fifths of the Borough is located within areas at a medium to high risk of flooding. This includes Main Towns such as Thorne which is considered to be in a very sustainable locations for development. Paragraph 16.142 of the Local Plan states that "the "housing allocation at Thorne-Moorends is constrained by a lack of potential development sites not at high risk of flooding and that although sufficient sites have been identified to meet the town's local needs housing, and some economic-growth led housing as well, were it not for this physical constraint to plan-making then the Main Town would have seen an allocation towards the top of the growth range.". Despite the suitability of the site and the settlement, the site has not identified as a housing allocation but instead been dismissed on flood risk grounds. However discussions are taking place with the Environment Agency and they are satisfied that if appropriate finished floor levels can be achieved then the proposals could be delivered satisfactorily to address any flood risk concerns. An increase in floor levels to +3.5m AOD can be achieved without any negative impact in townscape terms. Further modelling work has been instructed to support an application for residential development on the subject site, which is likely to indicate floor levels lower than a +3.5m AOD increase can be achieved. The application of the flood risk Sequential Test should be reviewed. Some sites have prepared site specific Flood Risk Assessments and passed the Sequential Test therefore there should an opportunity for other sustainable sites to demonstrate that flood risk issues can be overcome. This would then: 1 Ensure that the Council has fully explored the extent of non-Green belt land available for development before releasing Green Belt land; and 2 Ensure that Thorne is allowed to grow in line with the settlement hierarchy and the Council's own consideration of the proportion of growth that should rightly be apportioned to the town. In summary, the Publication Draft Plan is not positively prepared as it fails to provide the required housing allocations to meet a NPPF-compliant Plan period. It does it allocate sufficient land to meet the borough's housing requirement and is unsound as it has failed to give full consideration to the growth potential of Thorne. It has failed to comply with the NPPF by not considering non-Green Belt land before allocating substantive areas of Green Belt for development. The absence of the subject site as an allocation for housing development is a failure of the Local Plan. The site represents a wholly sustainable location for growth for the following reasons: - It is situated within one of Doncaster's Main Towns and is a location with strong policy support for future growth; - It is outside the Green Belt and its allocation will reduce the need to allocate additional housing sites which are located within the Green Belt; - It is well-contained and is an example of a rounding-off edge of settlement housing site; - It well-connected to the existing settlement centres of Thorne and Moorends; - There is a technical solution to the site's flood zone designation that would overcome flood risk concerns. - It is of a size and location capable of supporting a sustainable and viable mix of housing types, tenures and sizes.

Response:
No new sites are being allocated in Flood Zone 3, in line with national policy. This approach is supported by the Environment Agency. This is an entirely new plan and so the Sites and Policies DPD is irrelevant to emerging Local Plan site selection. Although Thorne & Moorends does not reach the top of its housing range, it does comfortably get within it, and overall the borough an deliver the required amount of housing. The idea of ranges is that some areas can deliver more, some less (depending on local circumstances) and overall this balances out. The Green Belt Topic Paper demonstrates how the issue of flood risk in the borough was carefully considered when considering to release Green Belt land. Overall Green Belt release is relatively modest and only taken where exceptional circumstances can be demonstrated, as shown in the Green Belt Topic Paper.
4.4 Draft Policy 6 identifies the proposed housing allocation which will deliver the housing requirement during the plan period. The proposed allocations are detailed within Tables H1 and H2 of the local plan and identify allocations with and without planning permission. The distribution of housing is considered to be based on the settlement hierarchy set out within Draft Policy 3. As drafted, Don Parkinson considers that the policy is unsound and is not consistent with national policy. The local plan is proposing to allocate a number of sites (without planning permission) currently in the Green Belt (including Site refs. 033, 115, 040, 501, 777, 141, 165/186, 929, 1028) before considering other sustainable sites located outside of the Green Belt (NPFF paragraphs 135, 136, 137). 4.5 Whilst Don Parkinson accept that Green Belt land will need to be released to support the future housing needs of Doncaster, it is considered these sites should only come forward and Green belt land released after the opportunities to allocate and develop on non-Green Belt land have been exhausted. 4.6 It is considered that the Council must seek to allocate additional housing on Countryside land in the first instance, particularly in sustainable locations, where the current levels of housing allocation fall short of the Plan’s own growth expectations under the terms of the settlement hierarchy. The distribution of additional dwellings should follow the Council’s settlement hierarchy and therefore consider further housing allocations within Main Towns should as Thorne. Don Parkinson is promoting a site within a sustainable location, which can help deliver additional housing on non-Green Belt land located on the edge of and well-related to a sustainable Main Town settlement. Further details are provided within Section 5 below.
Summary:
This Representation consists of a standard letter response that was submitted by 256 people stating that they do not support housing allocations in the west of Moorends on Bloomhill Road. The letters include direct quotes from the draft Thorne & Moorends Neighbourhood Plan and states that they do not agree with the Local Plan or Neighbourhood Plan. The area is high flood risk and the raising of the site to achieve the necessary mitigation will put existing property at more risk, as well as the wider village, and result in overlooking. The site would be an extension to the village rather than infill. The land is locked by the railway and existing properties. The infrastructure at Moorends is not sufficient to cope with the development (utilities, schools, GPs, and the roads would need widening). The site is greenfield and would result in the loss of wildlife (deer, frogs and newts).

Response:
The site(s) being objected to are rejected allocations in the Local Plan.
If I read this correctly you are asking for resubmission of any call for sites information submitted in 2014. There are two sites (adjacent to each other) which I feel should be taken forward into the next development plan. I have attached location plans (2) and copies of the original call for sites forms (2) which were submitted in 2014. The areas concerned are one of the few sites (and possibly the only sites) within Thorne & Moorends which are in Flood Zone 1. The areas are very close to the Town Centre. The areas have both previously been allocated as Residential Land in the UDP (1989?). Why have they not previously been developed? There are several historic reasons, but none which would prevent development now. We considered an application some time ago but the land was judged to be subject to the Greenfield Moratorium. (wrongly in my view but it matters little now). We were then told that the Council would not accept an outline application because the land neighbours (but is not within) the Thorne Conservation area. We did not want to risk making a full application (which would have to be detailed and expensive) without the comfort of knowing that the land would be allocated for housing. I can't see why a Council would not accept a red-line outline application with all matters reserved, as the council still have control over all matters (including density and external appearance) but that is how it was. I did not argue the point - at least, not for too long. We then became otherwise engaged in building a LIDL supermarket on another piece of (immediately) adjacent land. This large retail store is now complete and trading and has made a valuable addition to the Thorne Town Centre retail offer. After that we started (and are now almost complete) on a small, very high-quality, residential development in Lock Lane, Thorne. These two sites should be our next project. The town council very much are in favour of these sites being developed (refer to Cllr S, Durant). I would request that they be included in the forthcoming development plan. We would like to keep an option open on the larger area for another retail development but for the most part the areas would be housing sites. (SEE EMAIL FOR PLANS)

There are two adjacent sites which should be included in the next development plan. One of only a few sites locally which does not flood. Historic reasons why they have not yet been developed, including the Greenfield Moratorium, being told the Council will not support due to proximity to the conservation area, did not wish to risk making a full application. Two sites should be the next project in this area following Lidl and housing nearby, has town council support and should be in the development plan.

Response:
Site 133 has been allocated in the Local Plan. Support welcome.
We support many elements of this Policy which will assist in the continued regeneration of Doncaster. We particularly welcome the intention to:

- transform the Minster canalside and waterfront area into a vibrant mixed-use destination in its own right
- provide better opportunities for the independent and specialist retail and commercial sectors, particularly around Hallgate and the market
- create high-quality streets, public spaces and routes which are safe to walk and cycle between key destinations, particularly at Doncaster Waterfront, Doncaster Market, Doncaster Minster and St Sepulchre Gate West
- bring about environmental improvements to the character and appearance of the streetscape, especially at the station gateway, Hall Gate Triangle, and the Minster quarter
- create inviting and safe places for pedestrians, cyclists and disabled people, with special emphasis on reducing the severance caused by the Trafford Way/Church Way/Cleveland Street corridor and improving links to Doncaster Minster, St Sepulchre Gate West (including the railway station), Doncaster Waterfront
- encourage the retention and restoration of traditional shop fronts.

These measures will all help to deliver the Plan’s Objectives regarding quality of place and the historic environment.

Response:

Support welcomed.
Tests of Soundness:

Comment:

We support many elements of this Policy which will assist in the continued regeneration of Doncaster. We particularly welcome the intention to:
- transform the Minster canal side and waterfront area into a vibrant waterside quarter that reinforces and celebrates the minster (St George’s Church) and its relationship with the waterfront and the rest of the town centre
- Transform the station forecourt into a dynamic urban square which will provide a strong sense of arrival
These measures will all help to deliver the Plan’s Objectives regarding quality of place and the historic environment

Response:
Support welcomed
We note that the policy refers to the intention to identify the areas affected upon the Proposals Map. 2 Minster Canalside - We welcome the policy aims to regenerate and transform this area, including the general principles identified. 5 Doncaster Waterfront - We welcome the general policy aims. However, we do note that the text refers to the formation of a new footbridge over the river Don. Without full details of the location of this bridge, or its design, it is not possible for the Trust to confirm whether its installation would impact negatively upon the operation of the river as a navigable waterway. As a result, there is a significant risk that the policy, as worded to include the provision of the bridge, might not be able to be delivered. For example, the river Don is classified as a commercial waterway, and clearance of up to 5.5m may be required in order to accommodate commercial craft. The existing policy text is written in a fashion that indicates that the bridge is deliverable. This could be misleading to decision makers, and could mean that risks (concerning risks to navigation) could be negated by decision makers, which would make the Local Plan less effective in meeting aims to promote sustainable transport upon the Don Navigation (e.g. Publication Draft policy 13, part D). We note that the Local Planning Authority, in their summary report of comments received and their response to our comment (reference 03089), have highlighted that the policy text for Doncaster Waterfront was to be amended to include "where feasible a footbridge". However, this change does not appear to have been carried forward to the publication document. 7 Marshgate - We welcome reference to ecological networks and the formation of informal recreation routes, which we believe would improve access from the site to the waterway corridor, and could both enhance and encourage greater use of the strategic green infrastructure. PROPOSED CHANGE We note that the Local Planning Authority, in their summary report of comments received and their response to our comment (reference 03089), have highlighted that the policy text for Doncaster Waterfront was to be amended to include "where feasible a footbridge". However, this change does not appear to have been carried forward to the publication document. We recommend that this alteration is carried out, as it will make it clearer to decision makers about the need for an assessment of the feasibility of a footbridge, and would make the Local Plan more effective.

Support is given to Part 2 (Minster Canal side) and Part 7 (Marshgate). General support is given to Part 5 (Doncaster Waterfront). However, it is noted that the text refers to the formation of a new footbridge over the river Don. Without full details of the location of this bridge, or its design, it is not possible for the Canal & River Trust to confirm whether its installation would impact negatively upon the operation of the river as a navigable waterway. As a result, there is a significant risk that the policy, as worded to include the provision of the bridge, might not be able to be delivered. The existing policy text is written in a fashion that indicates that the bridge is deliverable. This could be misleading to decision makers, and could mean that risks (concerning risks to navigation) could be negated by decision makers, which would make the Local Plan less effective in meeting aims to promote sustainable transport upon the Don Navigation (e.g. Publication Draft policy 13, part D). It is noted that the Local Planning Authority, in their summary report of comments received to the 2018 Consultation highlighted that the policy text for Doncaster Waterfront was to be amended to include "where feasible a footbridge". However, this change does not appear to have been carried forward to the publication document. We recommend that this alteration is carried out, as it will make it clearer to decision makers about the need for an assessment of the feasibility of a footbridge, and would make the Local Plan more effective.

Response:

Noted and agree, additional wording proposed as per the suggested wording (Main Modification) provided and as follows: Policy 69, para 2 : New and improved pedestrian and cycle links, crossing facilities and greenspaces (including a new urban park and where feasible a footbridge over the river Don) will also be created, connecting the waterfront with the rest of the town centre.
**Comment Ref:** C/Policy 70, Criterion D/0016/28/039  
**Attend Examination:** Not Stated  
**Reason:** Not Stated  
**Area:** Chapter 16: Spatial Proposals  
**Policy:** Policy 70: Unity Regeneration Project  

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<td>The Grade II Listed Headstocks are, perhaps, the defining feature of this area. Therefore, their future conservation together with how any future development relates to them are matters which all developments in this area need to consider (i.e. it is not simply something that is only restricted to that part of the site which is shown on the plan at the top of Page 217). Policy 70, as a whole, therefore, needs not only to set out a framework which will help secure the future of the headstocks, but also how they will be incorporated into development proposals in a way which maximises their potential for place-making in this new development. <strong>PROPOSED CHANGE</strong> Policy 70:-(a) Delete Criterion D.4 (b) Insert the following additional Criterion:- &quot;G. Development of this site should help to secure the longterm conservation of the Grade II Listed headstocks. Detailed Masterplanning should seek to maximise the potential of the headstocks as a focal point forthe development and placeshaping&quot;</td>
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<td>The Grade II Listed Headstocks are the defining feature of this area and their future conservation together with how any future development relates to them are matters which all development in the area needs to consider. Policy 70 therefore needs to set out a framework to secure their future and how they will be incorporated into development proposals to maximise place-making.</td>
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<td>Noted and agree, additional criteria proposed as per the suggested wording (Main Modification) provided and as follows: Policy 70 - Unity Regeneration Project (Strategic Policy) - Part D Criteria 4 &amp; new Part G 4. other uses, including leisure, which will be supported where they lead to the long term conservation of the grade II listed headstocks.  G) Development of the site should help to secure the long-term conservation of the Grade II Listed headstocks. Detailed Master planning should seek to maximise the potential of the headstocks as a focal point for the development and place-shaping.</td>
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Tests of Soundness:

Comment:
Network Rail is supportive of the policies identified above: Policy 70 - the policy is sound in ensuring that new developments will provide improved rail infrastructure to benefit the new users of the station.

Summary:
Network Rail is supportive of the Policy 70 - the policy is sound in ensuring that new developments will provide improved rail infrastructure to benefit the new users of the station.

Response:
Support noted.
Policy 70 within the Local Plan Publication Draft relates to the Unity regeneration project. "New mixed-use development, between Stainforth, Dunsville, Dunscroft and Hatfield, known as unity and as shown on the Policies Map and Inset Map, will be supported?". Under the Submission Policies Map, FCC's Bootham Lane landfilling is allocated as within a mixed use development area associated with the Unity regeneration project. Policy 70 goes onto state that "? B. The visual openness of the Bootham Lane landfill site and surrounding area will be safeguarded and promoted; proposals that would enhance its landscape, amenity, countryside, recreation and biodiversity will be supported?". Paragraph 16.90 goes onto state that "?There are also significant opportunities for further green infrastructure and leisure uses (such as a country park) on land to the south of the railway line, around the Bootham Lane Landfill Site, and north of the railway line (Colliery Tip), which was not subject to the outline planning application, or identified on the Masterplan, and is therefore additional to the 80 hectares as referenced in the Policy". FCC supports the wider Unity regeneration project and the mixed-use allocation over their Bootham Lane landfilling. It is considered that the FCC's Bootham Lane site could be integral to the wider Unity project by providing green infrastructure and leisure uses, and a site for potential low carbon renewable energy sources, once the landfill area has been fully restored. In addition, FCC have aspirations to develop the non-landfilled areas/former operational areas of the site for commercial uses to compliment the proposed development within the Unity project. There is also the opportunity to improve the wider regeneration projects green credentials with a possible solar farm development on the future restored landfill areas. Landfilling has been undertaken by FCC at the Bootham Lane landfill site for a number of years and is currently permitted to continue to February 2020 followed by site restoration works and aftercare. As waste input volumes have reduced from the original projections, FCC will be seeking to safeguard the remaining void on site and intend on submitting a planning application to extend the period over which landfilling can take place. The site is therefore considered valuable from a waste management perspective and the ongoing operations will also enable longer term development platforms to be formed. FCC support the safeguarding of Bootham Lane Landfill within the Barnsley, Doncaster and Rotherham Joint Waste Plan (adopted 2012). FCC seek to safeguard the continuation of Bootham Lane Landfill operations including the closure period, consisting of restoration, aftercare and gas / leachate management, which should not be compromised by the development of the wider Unity regeneration project.

Summary:
Policy 70 within the Local Plan Publication Draft relates to the Unity regeneration project. "New mixed-use development, between Stainforth, Dunsville, Dunscroft and Hatfield, known as unity and as shown on the Policies Map and Inset Map, will be supported?". Under the Submission Policies Map, FCC’s Bootham Lane landfilling is allocated as within a mixed use development area associated with the Unity regeneration project. Policy 70 goes onto state that "? B. The visual openness of the Bootham Lane landfill site and surrounding area will be safeguarded and promoted; proposals that would enhance its landscape, amenity, countryside, recreation and biodiversity will be supported?". Paragraph 16.90 goes onto state that "?There are also significant opportunities for further green infrastructure and leisure uses (such as a country park) on land to the south of the railway line, around the Bootham Lane Landfill Site, and north of the railway line (Colliery Tip), which was not subject to the outline planning application, or identified on the Masterplan, and is therefore additional to the 80 hectares as referenced in the Policy". FCC supports the wider Unity regeneration project and the mixed-use allocation over their Bootham Lane landfilling. It is considered that the FCC’s Bootham Lane site could be integral to the wider Unity project by providing green infrastructure and leisure uses, and a site for potential low carbon renewable energy sources, once the landfill area has been fully restored. In addition, FCC have aspirations to develop the non-landfilled areas/former operational areas of the site for commercial uses to compliment the proposed development within the Unity project. There is also the opportunity to improve the wider regeneration projects green credentials with a possible solar farm development on the future restored landfill areas. Landfilling has been undertaken by FCC at the Bootham Lane landfill site for a number of years and is currently permitted to continue to February 2020 followed by site restoration works and aftercare. As waste input volumes have reduced from the original projections, FCC will be seeking to safeguard the remaining void on site and intend on submitting a planning application to extend the period over which landfilling can take place. The site is therefore considered valuable from a waste management perspective and the ongoing operations will also enable longer term development platforms to be formed. FCC support the safeguarding of Bootham Lane Landfill within the Barnsley, Doncaster and Rotherham Joint Waste Plan (adopted 2012). FCC seek to safeguard the continuation of Bootham Lane Landfill operations including the closure period, consisting of restoration, aftercare and gas / leachate management, which should not be compromised by the development of the wider Unity regeneration project.

Response:
Support noted.
NaCSBA's mission is to substantially increase the number of people able to build or commission their own home and they believe that opportunities should arise for prospective self and custom-builders through the Local Plan process. Custom & Self-Build Current custom and self-build (CSB) policy in England has evolved over the last 5 years with the Self-build and Custom Housebuilding Bill, receiving Royal Assent on 26 March 2015. The Bill is now an Act of Parliament. This Bill seeks to establish a register of prospective custom builders who are seeking a suitable serviced plot of land and requires LPAs to keep an up to date register of people within the district that wish to build their own home. NaCSBA are pleased to note that Doncaster Council do keep a self-build register which prospective self-builders can sign up to via the council’s website. The Right to Build legislation clearly demonstrates how the government intends for LPAs to respond to the requirements set out in the NPPF when drawing up new Local Plans. LPAs should take a proactive position to providing land and should undertake rigorous and effective evidence gathering to measure custom and self-build need in their districts. And LPAs that do not do so can expect their Local Plans to be found unsound at examination. The Housing and Planning Act 2016 conferred on LPAs the responsibility to “Give suitable development permission in respect of enough serviced plots of land to meet the demand for self-build and custom house building in the authority’s area?” The Act established that evidence of such demand would be provided by registers which LPAs are required to keep in accordance with the 2015 Self-Build and Custom Housebuilding Act. Paragraph 61 of the revised National Planning Policy Framework (NPPF) sets out the requirement for Local Planning Authorities (LPA) to plan for a wide choice of high quality homes to support sustainable communities and provide greater opportunities for home ownership. It goes on to state: "The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)."

Furthermore, the NPPF makes clear how small and medium sized sites can make an important contribution to meeting the housing requirement of an area. The identification and promotion of small and medium sites as per the NPPF paragraph 61 can be promoted in order to support the needs of custom and self-builders. Recent appeal decisions such as a proposal for the erection of up to 5 self-build dwellings at The Meadows, Bromsberrow Heath, Ledbury (APP/P1615/W/18/3213122) have highlighted and confirmed the weight that should be afforded to self-build as a material consideration in determining planning applications, which in turn demonstrates the importance of CSB in housing delivery. As a consequence of the policy and guidance outlined above, it seems clear that LPAs have a duty conferred upon them to actively meet the needs of those wishing to build their own homes. CSB in the Doncaster Local Plan whilst NaCSBA are pleased to note that the Local Plan review does contain reference to self-build, it is concerned that the provisions set out in Policy 8 and Policy 70 do not discharge the LPA's duties towards meeting the needs of those that wish to build their own home. Policy 70 promises the delivery of 0.4ha worth of land to be made available for self-build plots. At 40 dwellings per hectare this policy will ensure the delivery or just 16 self-build units or less than one a year over the plan period. Policy 8 pays lip-service to paragraph 61 of the NPPF by stating that the LPA will ‘encourage’ the provision of opportunities to accommodate custom build and self-build homes 'on housing allocations and elsewhere', but it does not set out the manner in which this will be achieved. In reality, the policy does not give certainty that any additional service self-build plots will be delivered over and above the 16 units promised by Policy 70. In order to meet the requirements, set out by national policy, it is important that the Local Plan is proactive and progressive in this area. It is not considered sufficient to simply include a policy that simply states that the LPA will ‘encourage’ delivery of building plots for custom and self-build. Instead, in order for the plan to be considered to be Positively prepared and Consistent with national policy it must demonstrate specifically and in some detail how it will ensure that the needs of custom and self-builders are to be met. PROPOSED CHANGE Recommendations There are a number a different policy mechanisms that could be employed to ensure a steady and sufficient provision of CSB opportunities within the borough, which would mean that the plan could be considered to meet needs of those wishing to build their own home, including: - Setting a requirement of, for example, 5% of units on large sites to be delivered as serviced self-build plots. In the case of oversupply a clause could be included stating that plots that are not sold within a certain timeframe (6-12 moths) can be built out by the developer - Allocating further small and medium-scale sites within the Plan specifically for custom and self-build to deliver a greater number of units than 16. - Allowing custom and self-build units outside, but adjacent to, settlement boundaries where the site is sustainable and does not represent an incursion into the open countryside. Particularly where the proposal would result in the ‘rounding off’ of the developed form of the settlement and the applicant is on the self-build register. It is considered that in order for the plan to be considered Positively prepared and Consistent with national policy at examination, it will be necessary to include at least two of the above recommendations in order to demonstrate that the delivery of self-build opportunities can meet the demand of those wishing to build their own home.

Summary:
See previous comment summary.

Response:
See response to Policy 8.
These representations have been prepared on behalf of Gerald Eve's client, Waystone Hargreaves Land LLP, which is a joint venture (JV) between Waystone (a construction and development specialist) and Hargreaves Land (the property development division of Hargreaves Services plc), herein referred to as "the JV". Both parties previously submitted representations as part of earlier rounds of consultation relating to the Council's emerging Local Plan. These current representations are made on behalf of the joint venture and in respect of its land interests west of the M18 motorway at Hatfield and Stainforth - known as the Unity Regeneration Project - and additional land immediately to the north east, known as Ashfields Tip. Since the Council's previous round of consultation, which closed in October 2018, it is noted that many of the comments and proposed changes set out by the JV partners have been incorporated into the latest Publication Version. These changes are welcomed and fully supported; however, there remain some areas of concern regarding the structure and content of Policy 70, which require further attention to ensure the policy is entirely sound in line with the tests of paragraph 35 of the National Planning Policy Framework (NPPF). As the policy correctly notes, the Unity site benefits from a major long-term planning permission spanning some 25 years (planning reference: 15/01300/OUTA). The current policy criteria aim to carry over some of the key details of that outline permission to promote the effective and timely delivery of the regeneration project, including the preparation of reserved matters applications. Significant progress has been made since the previous round of consultation with works starting in April 2019 to implement the link road between junction 5 of the M18 motorway and Waggons Way in Stainforth, which are expected to open in summer/autumn 2020. This key piece of infrastructure will unlock the development site and will facilitate the delivery of new homes and commercial land uses, which could potentially start from 2020. In addition, efforts are being made towards implementing a separate planning permission relating to the delivery of a new marina forming part of Unity Life. As progress on site begins to gather momentum it is considered essential that the emerging policy for the Unity site is coherent alongside the planning permission and avoids the introduction of any additional restriction or ambiguity that may slow down the delivery of the regeneration project at a later date. Importantly in this instance, the extant planning permission and its conditions. As such, it is considered that the following policy criteria require attention to ensure the Local Plan is sound: - 70 A(1) - as drafted, the policy indicates a restricted delivery rate of 1,015 dwellings during the plan period up to 2035, which could equate to an annual build out rate as low as 60-70 dwellings per annum (dpa) if adhered to (based on 1,015 homes divided by 15 years). The planning permission already controls the rate of delivery through condition 17, which allows up to 1,200 homes to be built up to 1 January 2028, a potential delivery rate in the region of 170 dpa, more than twice that of the draft policy. Whilst it is difficult to predict the actual build out rate over the periods (either to 2028 in line with condition 17 or to 2035 in line with the plan period), it is considered necessary to align the policy with the terms of the outline permission. In this case, the policy should state that up to 1,200 dwellings could be delivered up to 1 January 2018. It is noted that the Council has included the lower delivery rate as part of its housing trajectory, which is separate to the aims of Policy 70. There is no objection to the Council's housing trajectory as this has been prepared in consideration of realistic borough-wide factors and which can function independently of Policy 70. Moreover, the Council's housing trajectory can be reviewed and updated within its annual monitoring report. - 70 A(1) * - criterion A(1) ends with a footnote reference which is set out in bold at the bottom of Policy 70, and which has been added since the previous round of consultation in 2018. The footnote effectively sets out the provisions of condition 43 of the outline planning permission. The reference to self-build homes within the criterion is considered appropriate but the footnote is unnecessary, as the planning permission controls this aspect of delivery. If the footnote has been added purely for information purposes, it should be moved into the Explanation rather than set out within the policy itself. - 70 A(2) - there is an apparent discrepancy between the areas of land noted within the criterion and the figures stated within Table 16. As drafted, the policy criterion indicates that 33.6 ha of land may be delivered for the specified land uses over the plan period with a total of 56 ha completed over the lifetime of the development. However, Table 16 indicates total net developable land for the regeneration project to be equal to 63.86 ha (i.e. the sum of rows 4-8 relating to Class B uses). Clarification is therefore required as to how the total figure within the policy have been calculated, otherwise the total land area should be amended to reflect the figures in Table 16 (i.e. 63.86ha). - 70 E - criterion E is a copy of condition 42 of the outline planning permission. It is considered unnecessary to include a copy of the condition within policy, as it is a detailed development control matter specifically imposed upon the planning permission. It is therefore suggested that a reference to the requirement is moved to the policy's Explanation, confirming that this forms part of the site's planning permission and must therefore be adhered to. If the Inspector considers it to be necessary to keep the provision within the policy itself, it is suggested that the wording be changed to objectify the requirement rather than using the condition's wording verbatim - suggested wording is provided within Section 7 below. - Paragraph 16.92 - the paragraph indicates an objective of delivering 20.2 ha of employment development for the Unity Energy phase, comprising employment and energy focussed land uses. This objective would be more effective if included within the policy itself, albeit some re-wording would be necessary as suggested in Section 7 below. However, a portion of this land (16 ha), is also identified within the Barnsley, Doncaster & Rotherham Joint Waste Plan (March 2012) as a New Strategic Site under Policy WCS3. To ensure consistency between the Development Plan Documents, it is suggested that a cross reference is added into the text to make clear that part of the land is also identified as being suitable for waste-related development, regardless of whether it
is moved into the policy. The points below briefly consider how the above points align with the tests of soundness set out by the NPPF:

- Effective - the issues identified above including the inconsistencies between the draft policy and the extant outline planning permission make the policy less effective than if it was fully aligned with the permission. In its current form, the policy would result in ambiguity during the determination of reserved matters applications, particularly if the delivery rates for housing were higher than the current draft policy allows.
- Consistent with national policy - paragraph 16(d) of the NPPF clearly indicates that local plan policies should be "clearly written and unambiguous, so it is evident how a decision-maker should react to development proposals." In its current form, the aspects of Policy 70 highlighted above could result in confusion between the established parameters, conditions and planning obligations of the outline planning permission and the policy's criteria. This has the potential to adversely affect the progress of reserved matters applications during the plan period. The changes indicated above and proposed within Section 7 below are considered necessary to ensure the policy is sound. PROPOSED CHANGE Further to the issues highlighted within Section 6 above, the following proposed modifications are considered necessary to make the policy sound:

- Policy 70 A(1) - amend the first line to read "up to 1,200 new homes up to 1 January 2028, and?"
- Policy 70 A(1)* - delete the asterisk from the end of criterion A(1) and the accompanying footnote relating to the submission of reserved matters, as this requirement is sufficiently controlled by the outline planning permission.
- Policy 70 A(2) & Table 16 - clarification is required between the areas stated within the criterion and the corresponding rows within Table 16.
- Policy 70 E - delete the criterion as the requirement is adequately controlled by the outline planning permission.

Should the inspector consider it to be necessary to keep this as an objective within the policy itself it is considered necessary to re-word the criterion along the lines of: "To ensure the development does not harm the supply or occupation of gypsy and traveller sites in the borough, the developer will be responsible for identifying an alternative site of a similar size, proportion and standard to accommodate 20 gypsy and traveller pitches to be transferred to the Council or its nominee in accordance with the planning permission." - Policy 70 new criterion - add new criterion to clarify the objective currently indicated in paragraph 16.92 of the Policy's Explanation, along the lines of: "70[x] - Unity Energy comprises approximately 20.2 hectares of land located north of the railway line and adjacent to the former Hatfield Colliery. The land will be used to deliver employment uses, including energy focused opportunities. Up to 16 hectares may also be used to support waste-related facilities to support the objectives of the Barnsley, Doncaster & Rotherham Joint Waste Plan."; or, in such instance as the Inspector considers it necessary to keep this as an objective within the policy itself it is considered necessary to re-word the criterion along the lines of: "To ensure the development does not harm the supply or occupation of gypsy and traveller sites in the borough, the developer will be responsible for identifying an alternative site of a similar size, proportion and standard to accommodate 20 gypsy and traveller pitches to be transferred to the Council or its nominee in accordance with the planning permission."

Summary:
Policy 70 should be amended to better reflect the site's outline planning permission and progress made since approval. The following policy criteria require attention to ensure the Local Plan is sound: Policy 70 A(1) - amend the first line to read "up to 1,200 new homes up to 1 January 2028, and?" to reflect condition 17 of the outline planning permission. (The lower delivery rate is included in the Local Plan housing trajectory, which is separate to the aims of Policy 70. There is no objection to the Council's housing trajectory as this has been prepared in consideration of realistic borough-wide factors and which can function independently of Policy 70. Moreover, the Council's housing trajectory can be reviewed and updated within its annual monitoring report.) Policy 70 A(1)* - delete the asterisk from the end of criterion A(1) and the accompanying footnote relating to the submission of reserved matters, as this requirement is sufficiently controlled by the outline planning permission. Policy 70 A(2) & Table 16 - clarification is required between the areas stated within the criterion and the corresponding rows within Table 16. There is an apparent discrepancy between the areas of land noted within the criterion and the figures stated within Table 16. As drafted, the policy criterion indicates that 33.6 ha of land may be delivered for the specified land uses over the plan period with a total of 56 ha completed over the lifetime of the development. However, Table 16 indicates total net developable land for the regeneration project to be equal to 63.86 ha (i.e. the sum of rows 4-8 relating to Class B uses). Clarification is therefore required as to how the total figure within the policy have been calculated, otherwise the total land area should be amended to reflect the figures in Table 16 (i.e. 63.86ha). Policy 70 E - delete the criterion as the requirement is adequately controlled by the outline permission (condition 42). Should the inspector consider it to be necessary to keep this as an objective within the policy itself it is considered necessary to re-word the criterion along the lines of: "To ensure the development does not harm the supply or occupation of gypsy and traveller sites in the borough, the developer will be responsible for identifying an alternative site of a similar size, proportion and standard to accommodate 20 gypsy and traveller pitches to be transferred to the Council or its nominee in accordance with the planning permission."

Response:
Policy 70 A(1) - Paragraph 16.89 of the draft Local Plan sets out the position in terms of the outline permission and condition attached to such consent, which clarifies the number of proposed dwellings (i.e. 1200 by 2028). The policy as drafted, sets out a revised trajectory for the purposes of housing land supply at the settlement to ensure sufficient sites are allocated to meet the plan period requirement. Retaining the 1200 dwellings figure by 2028 would require 150 dwellings pa to be completed every year from April 2020 at the time of drafting, the Council are still awaiting reserved matters applications. Factoring in, time determination, lead-in times, starts on site etc the 1,015 is considered to be more realistic yield. That said, the 1200 dwellings could come quicker, as per the condition of the outline permission. Policy 70 A(1)* - The footnote is helpful clarity. Policy 70 A(2) & Table 16 - The schedule of 'B type' employment uses in table 16 does equate to a slightly higher total employment land supply of circa 66 hectares for the Unity site compared to the figure (55ha) quoted in the policy and supporting table E3 and explanatory text. It is proposed to make minor amendments to the local plan document to refer to the larger circa 66ha figure therefor for clarity and consistency, but this does not affect the plan period supply from this development which is still 33.6ha within the plan period. Policy 70 E - Part E of the policy it considered to provide helpful clarity in the delivery. To ensure there is no overall net loss to the Gypsy and Traveller pitches in order to ensure sufficient pitches are available to meet the community needs in the borough. Policy 70 new criterion - The Barnsley, Doncaster and Rotherham Joint Waste Plan is not to be superseded by Doncaster's Local Plan. Therefore, waste matters are currently dealt with
Tests of Soundness:

Comment:

In addition to the land forming the extent of the masterplan area as shown within Figure 17 of the Publication Version, Hargreaves Land has previously submitted representations in respect of its land interests immediately north east of the masterplan area, which is commonly referred to as Ashfields Tip. Attachment 1 to these representations shows the extent and location of the land (annotated “Former Ashfields Tip - Potential Special Policy Area”), in relation to parcels of land within the former Hatfield Colliery site. The land equates to approximately 35 ha and represents an area, over tipped with colliery spoil originating from the former Hatfield Colliery. (SEE EMAIL FOR Attachment) The land currently lies outside of the allocated regeneration site area as shown on the Policies Map, immediately to the east of Unity Life, and which is bound by Kirton Lane to the south and the M18 motorway to the east. Whilst the JV does not consider the exclusion of the land to necessarily result in a direct conflict with the national tests of soundness, it believes that Policy 70 and the plan overall would be improved by its inclusion. The land forms an important part of the JV’s longer-term strategy, which is likely to extend well beyond the plan period, with potential to deliver further housing or employment uses to support the current masterplan. Spatially, the land in question forms a natural extension of the existing masterplan and which could also help to expand the green infrastructure associated with Unity Life. As it is recognised as a longer-term opportunity and one for beyond the plan period, it is considered appropriate to identify the land as Safeguarded Land. This approach would be:

- Consistent with national policy - specifically, the inclusion of Ashfields Tip would make the most effective use of land in line with the objectives of NPPF paragraph 118, and would also support the consideration of a “minimum 15 year period” from the point at which the local plan is adopted, in line with paragraph 22.
- Justified - the additional land would support the long-term regeneration of the Unity masterplan area and which would relieve the longer-term pressures on other areas of undeveloped land across the borough. Following this approach is considered to be of little consequence to the wider objectives of the Local Plan and would not have a direct impact on the Council’s land supply calculations.
- Moreover, it would provide additional land supply that could be drawn upon following a formal future review of the Local Plan (i.e. every 5 years in line with NPPF paragraph 33). PROPOSED CHANGE - Ashfields Tip - add a sub-heading after the main policy criteria stating, “Ashfields Tip”, below which a new paragraph should state something along the lines of: “The land at Ashfields Tip as shown on the Policies Map is to be safeguarded for development beyond the plan period. The land is suitably located to extend the Unity Regeneration Project area as it is confined to the spatial restrictions by way of existing infrastructure and allocated development land. The land should only be allocated following a formal review of the Local Plan’s strategic policies or may be considered for development where evidence clearly supports the early release of additional land to satisfy the Council’s objectively assessed needs.” - Ashfields Tip: Policies map amendment - amend the Policies Map and Key to identify the extent of the Ashfields Tip site. In making these changes, there are no adverse implications for any other strategic or non-strategic policies within the Publication Version.

Summary:

Include land (known as Ashfields Tip) to the north-east of the Unity Masterplan area within the Masterplan area as Policy 70 and the plan overall would be improved by its inclusion as this land forms an important part of the site’s longer-term strategy, which is likely to extend well beyond the plan period, with potential to deliver further housing or employment uses to support the current masterplan. Spatially, the land in question forms a natural extension of the existing masterplan and which could also help to expand the green infrastructure associated with Unity Life. Add a sub-heading after the main policy criteria stating, “Ashfields Tip”, below which a new paragraph should state something along the lines of: “The land at Ashfields Tip as shown on the Policies Map is to be safeguarded for development beyond the plan period. The land is suitably located to extend the Unity Regeneration Project area as it is confined to the spatial restrictions by way of existing infrastructure and allocated development land. The land should only be allocated following a formal review of the Local Plan’s strategic policies or may be considered for development where evidence clearly supports the early release of additional land to satisfy the Council’s objectively assessed needs.” Policies map amendment - amend the Policies Map and Key to identify the extent of the Ashfields Tip site.

Response:

The settlements housing requirement has already been hugely exceeded through the allocations identified in the Local Plan. In the context of there now been a statutory requirement to review Local Plans at least every 5 years, it is considered justified to re-visit at such a stage and/or for consideration through the emerging Stainforth Neighbourhood Plan.
We support many elements of this Policy which will assist in the continued regeneration of Mexborough. We particularly welcome the intention to:- - bring environmental improvements to enhance the streetscape - retain and sympathetically restore, Mexborough’s historic buildings (particularly in the Conservation Area); - encourage the retention and restoration of traditional shop fronts; These measures will all help to deliver the Plan’s Objectives regarding quality of place and the historic environment.

Response:
Support welcomed
Tests of Soundness:

Comment:
We support many elements of this Policy which will assist in the continued regeneration of Thorne. We particularly welcome the intention to:

- provide opportunities to improve connectivity between Finkle Street and King Street and develop the Market Place as a key focal point of the town centre;
- restore/bring listed buildings and other buildings of local importance back into active use;
- protect and enhance the setting of the scheduled monument (Peel Motte and Bailey Castle);
- respect the historic pattern and character of buildings and spaces within or on the edge of the town centre;
- encourage the retention and restoration of traditional shop fronts. These measures will all help to deliver the Plan’s Objectives regarding quality of place and the historic environment.

Summary:
'Sound'. We support many elements of this Policy which will assist in the continued regeneration of Thorne. We particularly welcome the intention to:

- provide opportunities to improve connectivity between Finkle Street and King Street and develop the Market Place as a key focal point of the town centre;
- restore/bring listed buildings and other buildings of local importance back into active use;
- protect and enhance the setting of the scheduled monument (Peel Motte and Bailey Castle);
- respect the historic pattern and character of buildings and spaces within or on the edge of the town centre;
- encourage the retention and restoration of traditional shop fronts. These measures will all help to deliver the Plan’s Objectives regarding quality of place and the historic environment.

Response:
Support welcomed.
It is considered that the Plan is sound in relation to the allocation of Site 925 which has outline planning permission for residential development and a reserved matters approval for approximately half of the site. Mr Fielder, the owner of the site and the person on whose behalf these representations are made, has entered into a contract for the sale of the whole 1.78ha site for residential and related development (i.e. a care home). Detailed pre-application negotiations have taken place between the developer and Council Planning and Highways Officers and the landowner has been formally notified that a planning application for the development has been lodged. At the date of these representations the application has not been posted on the Council’s public access website so we cannot give a reference for it. These representations, however, confirm that the site is available and that the development is deliverable within the Plan period.

**Summary:**
Re site 925 - land off Highfield Road Askern. o Site with Outline planning permission for residential development. o Support allocation of site.

**Response:**
Support for site allocation is noted.
Comment: 2.69 We object to the 'Development Limits' boundary of Askern as set out in the policies map. Recommendation 2.70 We recommend that the development limits boundary of Askern is amended to include the represented site as well as the adjacent former Askern Saw Mill site. Justification 2.71 In order to safeguard development growth within the settlement boundary.

Summary:
- Object to the 'Development Limits' boundary of Askern as set out in the policies map. 
- Recommend the development limits boundary of Askern is amended to include the represented site as well as the adjacent former Askern Saw Mill site.

Response:
Development limits have been drawn in line with the methodology and has been subject to previous consultation. There are no exceptional circumstances identified to include the Green Belt site adjacent to the Saw Mills either as an allocation or within the development limits for the settlement.
2.37 Policy 6 sets out the housing allocations that will help deliver the spatial strategy, meet the needs for housing and support sustainable communities. 2.38 As mentioned previously, the site is currently shown to be retained within the Green Belt within the draft Plan and has not been included as a Housing allocation. DLP objects to this approach as it is considered to be unsound and it is proposed that the land is allocated as a Housing allocation. 2.39 Paragraph 4.44 states that the new urban edge allocations have of necessity required land previously designated in the UDP as Green Belt or Countryside; and resulted in amendments to town and village development boundaries to create new defensible boundaries. 2.40 This process however has not been undertaken in an appropriate manner as it has omitted sites which clearly represent reasonable alternatives to the selected allocations. As such the assessment of the impact on the Green Belt of these proposed allocations, dealt with collectively under Policy 6 then individually in Tables H1, H2 and H3 (set out in detail in Chapter 16), has not been undertaken on a sound basis. 2.41 The approach to the assessment is described in detail in Appendix 1 of this objection. Our objection to the selected housing and mixed use allocations which are to be removed from the Green Belt is that the assessment of the impact of removing these sites from the Green Belt and their subsequent development is unsound. This is based on the fact that the approach assessed sites in an inappropriate manner which failed to take into account the nature and impact of the sites being considered for release. 2.42 In the case of land Adjacent Askern Saw Mill, the impact of the Green Belt was assessed as part of a much larger site of some 571.2 hectares which did not share the same Green Belt characteristics as the represented site itself. If the redevelopment of "land Adjacent Askern Saw Mill" only was to be assessed, then the impact of the Green Belt would be considerably different. This is illustrated by our assessment of the Green Belt function of the site in appendix 1. Recommendation 2.43 It is proposed that the site is removed from the Green Belt and allocated as a Housing allocation for up to 180 dwellings (based on a developable area of 6ha at a rate of 30 dwellings per hectare). Justification 2.44 For the reasons set out above and within the appended SPRU report, it is correct to accommodate growth based on meeting requirements under the full assessment of jobs-led growth (1,073 dpa) for the full plan period to 2035 and for a new allocation to be made at land adjacent to Askern Saw Mill to assist in meeting this requirement in the most sustainable way.

Summary:
Policy 6: Housing Allocations (Strategic Policy). Tables H1, H2, H3 and Chapter 16 Re land adjacent to allocated site: 1. Propose the site is removed from the Green Belt and allocated as a Housing Allocation. 2. If this site was assessed (GB review) on its own rather than as part of a larger site then the outcome would be different and the site could be released from the GB. 3. An assessment is provided to show that site can be removed from the GB.

Response:
Request noted. As set out in the Housing Topic Paper and Green Belt Topic Paper, no additional sites are required in Askern as the settlement can meet and surpass its housing targets, and there are no exceptional circumstances to justify any Green Belt release here.
Tests of Soundness:

4.1 This Local Plan Representation has been prepared by DLP Planning Ltd on behalf of Mr Ian Murray in response to the publication of the Doncaster Local Plan (Regulation 19) for consultation. 4.2 The SPRU report which can be found at Appendix 2, concludes that significantly greater levels of potentially suitable growth could be provided at different tiers of the settlement hierarchy. We also recommend the consideration of Tier 3 - Service Towns and Larger Villages as potential locations for additional growth, where sustainable growth opportunities are identified. Overall, the Local Plan should be updated to reflect the housing requirement of 1,073 dwellings per annum for the plan period to 2035. 4.3 The site is currently included within the Green Belt in the draft Local Plan document. DLP strongly objects to this designation. For the reasons set out within this representation it is recommended that the site be removed from the Green Belt. 4.4 The Council has demonstrated the Exceptional Circumstances for Green Belt release within the evidence base supporting the Local Plan. Within this context, DLP has undertaken a Green Belt assessment which specifically assesses the site against the five purposes of the Green Belt has also been prepared. This assessment demonstrates why the site should be allocated for development. 4.5 The site at “Land adjacent to the former Askern Saw Mill” has not been previously considered through the Local Plan process, however it is suitable, available and deliverable as a Housing allocation as confirmed in this representation and supported by the planning permission for mixed use development of the land to the west of the site at Askern Saw Mill. 4.6 The benefits of allocating the site for development include: - Supporting the growth of Askern and safeguarding development within the settlement boundary; - The retention and safeguarding of the provision of open space to the north of the site; - Supporting the adjacent built development; and - Providing an opportunity to deliver residential and possibly employment uses, which will complement the adjacent mixed use development site. 4.7 On the grounds of ensuring that a sound plan is progressed, DLP Planning object to policies 2, 3, 4, 6, 8, 29, 30, 66 and the policies map, as drafted and make a number of recommendations for amendments to ensure the soundness of the Plan.
1.1 This Local Plan Representation has been prepared by DLP Planning Ltd on behalf of Mr Ian Murray in response to the publication of the draft Doncaster Local Plan for consultation (Regulation 19). 1.2 This representation relates to “Land adjacent Askern Saw Mill” which remains available, developable and deliverable for mixed use development (residential and employment). (SEE EMAIL FOR Figure 1: Aerial view of site) 1.3 The site is currently included within the Green Belt in the draft Local Plan document. DLP strongly objects to this designation. For the reasons set out within this representation it is recommended that the site be removed from the Green Belt and allocated for Housing with the area of existing open space located to the north of the site remaining as Open Space. 1.4 The Council has demonstrated the Exceptional Circumstances for Green Belt release within the evidence base supporting the Local Plan. Within this context, DLP has undertaken a Green Belt assessment which specifically assesses the Askern Saw Mill site against the five purposes of the Green Belt has also been prepared. This assessment is referenced herein (and included at Appendix 1) to demonstrate why the site should be allocated for development. 1.5 This representation should be read alongside the formal response form that has also been completed and submitted in relation to the site. 1.6 DLP Planning Ltd expressly objects to policies 2, 3, 4, 6, 8, 29, 30, 66 and the proposals map as currently drafted and requests the amendments set out herein, in order to ensure that the plan is sound. 1.7 The structure of this representation will be as follows: - Comments on the draft Local Plan in Section 2; - Site Assessment in Section 3; and - Conclusion in Section 4.
3.1 The site comprises undeveloped land extending to approximately 8.6ha and situated to the south east of the settlement of Askern and immediately adjacent the former Askern Saw Mill, as illustrated in Figure 2. (SEE EMAIL FOR Figure 2: Aerial view of site) 3.2 The site comprises of a single field bound by the railway line to the east, Stream Dike to the south and open space to the north. The site is located immediately adjacent the former Askern Saw Mills site which benefits from outline planning permission for a mixed use scheme comprising of the erection of up to 220 dwellings, Use Class A1/A3/AS use and Use Class B1(c) and B2 use (ref: 08/01077/OUTA). A subsequent reserved matters application is currently awaiting a decision which details access, appearance, landscaping, layout and scale for mixed use redevelopment of land (ref: 16/01651/REMM). 3.3 The area of land to the north of the site is currently used as public open space and will be retained as open space. 3.4 Given that the site and Askern Saw Mills are under the same ownership, access to the site can be achieved from Doncaster Road, through the former Askern Saw Mills site. The site is accessible to the strategic motorway network. The M62 runs to the north of Askern and can be accessed from the A19 (Doncaster Road), the A19 also provides direct access to the centre of Doncaster located to the south of Askern. 3.5 The site is situated within Flood Zone 2 according to Environment Agency’s flood risk map, an area at a medium risk of flooding. The adjacent site at Askern Saw Mill is also situated within Flood Zone 2, however planning permission has been granted for a mixed use scheme on this site and although it was initially objected to by the Environmental Agency on flood risk grounds, however an amended Flood Risk Assessment was submitted which resulted in the Environmental Agency accepting the amendment. 3.6 The site is allocated as Green Belt in the adopted Doncaster UDP. Policy ENV3 outlines the principles for this policy area and sets out criteria under which development may be undertaken are the relevant policies for the site. 3.7 It is considered that this policy guidance is outdated and no longer reflects the strategic and economic requirements which are relevant to the area today. It is evident that there is a need to provide additional housing, employment and investment in the locality and improve the overall physical quality of the environment. 3.8 Overall, it is considered that the site is large enough to accommodate uses including housing and possibly employment, with the opportunity to maintain a green landscape buffer around the site to the east and south. The development can form a logical extension to the adjacent former Askern Saw Mill site, which is being redeveloped into a mixed use scheme. 3.9 A Green Belt review of the site can be found at Appendix 1 of this representation which specifically assesses the Askern Saw Mill site against the five purposes of the Green Belt. This assessment demonstrates that when assessed as an individual site, the site scores differently than when it has been assessed as part of the wider “North 1” site within the Stage 1 Review. To summarise, when assessed individually against the criteria, the site performs better overall than when assessed as part of “North 1” and therefore represents a site that has the potential to be removed from the Green Belt. 3.10 Proposed Housing Allocation 3.10 In order to ensure that there is a sufficient and suitable supply of land to deliver their housing and previously developed land objectives, Local Planning Authorities are required at the local level to identify broad locations and specific sites which will enable a continuous delivery of housing for at least 15 years. Local Planning Authorities are also required to identify a further five years supply of specific housing sites for years 6-10 that are developable, and if possible specific sites for years 11-15 but if not broad locations for future growth. 3.11 Specifically, Local Planning Authorities should identify sufficient deliverable sites for the first five years, to be considered deliverable sites, at the point of adoption of the Local Plan. 3.12 For sites to be delivered they need to be: available (the site is available now), suitable (development of the site would contribute to the creation of sustainable communities) and achievable (there is a reasonable prospect that housing on the site will be deliverable on the site within 5 years). Availability 3.13 The site is within Mr Murray’s ownership with a strong interest in bringing the site forward for a housing-led development. There is also interest in developing the site from Empire Property Concepts, who are currently redeveloping the adjacent Askern Saw Mill site. Deliverability 3.14 Given the size of the site and its potential capacity, the site provides opportunities to make notable contributions to the housing provision in Askern such as affordable housing, education and open space (subject to viability). 3.15 It is considered that this site can be comprehensively developed to deliver residential and possibly employment uses, which will complement the adjacent mixed use development site. Suitability 3.16 There are no physical constraints to suggest that carefully designed residential development could not be brought forward during the plan period. Capacity 3.17 Based on a developable area of 6ha, the site could deliver up to 180 dwellings (based on 30 dwellings per hectare). This quantum of development would also provide for landscaping and new public open space to the north of the site, if appropriate. Sustainability 3.18 There are several local facilities and services located in close proximity to the site, including, but not limited to, the following: - Askern Spa Junior School (approx. 770m) - Askern Moss Road Infant School (approx. 700m) - Spa Academy Askern (approx. 1km) - Co-op Food (approx. 875m) - Heron Foods (approx. 710m) - Post Office (approx. 785m) - Lakeside cafe (approx. 640m) - Askern Community Library (approx. 690m) - The Lakeside Practice (approx. 630m) There are also several bus stops within close proximity of the site in the Askern settlement. The stops provide access to the following services: - Service 405: Selby - Doncaster Town Centre - Service 408: Pontefract - Doncaster - Service 51a: Askern - Doncaster - Service 412: Carcroft - Doncaster

Summary:

Site Assessment Re proposed site adjacent to (allocated) Saw Mills o Includes extensive site assessment to justify site being removed from GB and allocated for housing. Greenbelt o provides a ‘review’ of the GB assessment. Also included o ‘Soundness Assessment of the Proposed Jobs-Led Housing Requirement and Implications for the Proposed Spatial Strategy’
Response:

Request noted. This is the first time that the site has been put forward for consideration through the local plan process. As set out in the Housing Topic Paper and Green Belt Topic Paper, no additional sites are required in Askern as the settlement can meet and surpass its housing targets, and there are no exceptional circumstances to justify any Green Belt release here. The site is also flood risk so likely to have failed the flood risk sequential test.
C/Site 1010/04288/1/015

Peel Land and Property Management Limited

Comment Ref: C/Site 1010/04288/1/015

Attend Examination: Attend Hearing

Reason: In order to explain further the rationale behind the suggested changes and be given the opportunity to respond to any changes the Council propose to make and any further evidence that is presented.

Area: Chapter 16: Spatial Proposals

Policy: Service Town/Village - Auckley-Hayfield Green

Tests of Soundness:

Comment:

9.1 Draft LP policy 7 (DSA) does not allocate two areas of land which are part of the Airport Masterplan proposals. These parcels of land comprise the following: - Land at Gatehouse Lane (Site No. 1010) This site is envisaged in the Airport Masterplan (and within the Regulation 18 consultation version) for residential development (see attached plan contained in Appendix 5). Peel requests that this land is removed from the countryside and allocated for residential development. Development Limits should be amended to accommodate this allocation. The Site lies immediately adjacent to the east of Hayfield Green which forms part of the wider Auckley-Hayfield Green settlement and an outline planning application for the development of up to 150 dwellings is currently being prepared by Peel and is due to be submitted to the Council shortly. The site has been previously worked as a sand and gravel quarry and derelict buildings remain in a proportion of the site. It is located on the edges of Hayfield Green, with strong defensible boundaries defined by physical development to the north, east and south and presents a perfectly logical continuation of the Hayfield Green settlement. Conversely, it no longer presents a logical area of open countryside having been separated from countryside in all directions. The development will facilitate the delivery of a well-planned sustainable residential development which will provide a range of dwelling types and tenure in line with market demand, including affordable homes, within Hayfield Green. Furthermore, it offers an opportunity to provide additional public open space that is accessible to both existing and future residents and will also strengthen the character and definition of the settlement boundary in this part of Hayfield Green. (SEE EMAIL FOR Appendix) 9.2 These requests are considered appropriate as we consider that a more positive approach should be taken to ensure that the LP provides for the full level of housing need that the housing assessment identifies could reasonably be associated with supporting the economic growth objectives of the Council. This would require the Plan to provide for closer to 1,060 homes per annum, or close to 15,900 homes over the plan period. Notwithstanding this, and independent of future housing at DSA as controlled by draft Policy 7, Peel contend that there is currently a shortfall of 300 committed homes within the immediate vicinity of DSA as a result of the reduced number of 450 homes now built out at Hurst Lane under application reference 09/02048/OUTM. The LP Housing needs assessment assumes full delivery of the 750 units consented on this site; if the committed shortfall not provided elsewhere in the vicinity, then there will be an under-delivery against the numbers assumed in the LP evidence base. 9.3 The recent resolution to grant outline planning permission (subject to S106 agreement) at the March 2019 DMBC Planning Committee of up to 140 new homes on land off Hayfield Lane (application reference 18/01748/OUTM), has meant that this shortfall has now effectively been reduced to 160 new homes. The principle of applying this shortfall on separate residential sites was fully accepted by the Council when the Hayfield Lane application was reported to and considered by the March 2019 Planning Committee. The Committee report stated: ‘Policy CS6 of the Core Strategy recognises that the 750 dwellings approved off Hurst Lane will provide an additional source of housing to the allocations set out in Policy CS2, and any further housing growth at Hayfield Green would not be in accordance with the Core Strategy’ In practice however, the reserved matters permissions for the residential development have resulted in a shortfall of 300 dwellings at the Hurst Lane site, with the density of development being much lower than anticipated. As such, the principle of 750 homes to serve the airport and its business park is applicable, and given that the 750 homes are accounted for as additional to Doncaster’s housing growth allocations under Core Strategy policies CS2 and CS6, this planning application will go some way to making up this shortfall whilst not breaching the Councils wider housing delivery numbers. On this basis, given that development has already been previously been approved on the application site, and that there is headroom in the expected 750 dwellings to be delivered in this settlement as set out in the Core Strategy, it is considered that the principle of residential development is acceptable in this location.’ 9.4 Therefore, although now reduced to reflect the resolution to grant outline permission 18/01748/OUTM, a committed shortfall of 160 new homes serving the DSA area still remains to be delivered at Hayfield Green in line with Policy CS6 of the adopted development plan. The allocation of Gatehouse Lane as a residential site would ensure that this shortfall is positively planned and accounted for in the draft LP. This would also ensure the risk of other third party developers speculatively to ‘claim’ this shortfall and submitting speculative planning applications on sites where are less sustainable and suitable than Gatehouse Lane.

Summary:

The Local Plan fails to allocate Site 1010 - Gatehouse Lane: This site is in the airport masterplan for residential development. It should be removed from the countryside and allocated for residential use. It lies to the east of Hayfield Green and an outline for up to 150 dwellings is currently being prepared by Peel to be submitted shortly. The site was previously a quarry and derelict buildings remain on a portion of the site. It is on the edge of Hayfield Green with strong, defensible boundaries and development to the east, south and west, meaning it is a logical conclusion to Hayfield Green. It is no longer logical countryside as it is separated in all directions from this. It could deliver a sustainable housing site with a range of housing types in line with market demand, including affordable homes, as well as open space, and will strengthen the character and definition of the settlement. The requests are appropriate as it is a more positive approach to providing the full level of housing need that the housing assessment identifies could be reasonably associate with supporting the Council's economic aims, i.e. 1,060 dpa required. Notwithstanding this and independent of housing controlled in Policy 7, Peel contend there is a shortfall of 300 homes as a result of the reduction from 750 units to 450 units on the Hurst Lane application (09/02048/OUTM). The LP Housing needs assessment assumes full delivery of the 750 units consented on this site; if the committed shortfall not provided elsewhere in the vicinity, then there will be an under-delivery against the numbers assumed in the LP evidence base. Recent outline permission for 140 homes at land on Hayfield Lane reduced this to 160 dwellings. The
principal of applying this shortfall was considered at planning committee, the report said: 'Policy CS6 of the Core Strategy recognises that the 750 dwellings approved off Hurst Lane will provide an additional source of housing to the allocations set out in Policy CS2, and any further housing growth at Hayfield Green would not be in accordance with the Core Strategy?In practice however, the reserved matters permissions for the residential development have resulted in a shortfall of 300 dwellings at the Hurst Lane site, with the density of development being much lower than anticipated. As such, the principle of 750 homes to serve the airport and its business park is applicable, and given that the 750 homes are accounted for as additional to Doncaster's housing growth allocations under Core Strategy policies CS2 and CS6, this planning application will go some way to making up this shortfall whilst not breaching the Councils wider housing delivery numbers. On this basis, given that development has already been previously been approved on the application site, and that there is headroom in the expected 750 dwellings to be delivered in this settlement as set out in the Core Strategy, it is considered that the principle of residential development is acceptable in this location.'

Response:

Auckley - Hayfield Green can meet and surpass its housing target via existing commitments. There is no need to allocate any further land here. Additionally, there is further housing linked to jobs adjacent to the airport. Re: the shortfall and whether this can be made up on other sites - this was a matter related to that planning application and was a matter of judgement for the decision maker / committee at the time. It is not part of Local Planning Policy and therefore irrelevant to decision making for the Local Plan, where the focus is on delivering the specified growth in the places it is needed. The fact less will be delivered at Hurst Lane than originally anticipated has been factored in to housing calculations. The site is excluded from the development limits as per the development limits methodology.
Chapter 16: Spatial Proposals

30/09/2019

Turley

Organisation: Peel Land and Property Management Limited

Comment Ref: C/Site 946/04288/1/014

Attend Examination: Attend Hearing

Reason: In order to explain further the rationale behind the suggested changes and be given the opportunity to respond to any changes the Council propose to make and any further evidence that is presented.

Area: Chapter 16: Spatial Proposals

Policy: Service Town/Village - Auckley-Hayfield Green

Tests of Soundness:

Comment:

9.1 Draft LP policy 7 (DSA) does not allocate two areas of land which are part of the Airport Masterplan proposals. These parcels of land comprise the following: - Land to the north of the Doncaster to Lincoln railway line (Site No.946) This site is proposed under the Masterplan to deliver a community rail station, parking and residential development. Peel requests this land be removed from the open countryside and allocated for residential/mixed use development. Development Limits should be amended to accommodate this allocation. More detailed representations are being submitted by the current landowner, with whom Peel have held discussions. Allocation of Site No.946 would assist with delivery of the community rail station in the event this rail option is required (this would be the case only if the preferred rail option to connect DSA to both the ECML and Doncaster to Lincoln line did not come to fruition). 9.2 These requests are considered appropriate as we consider that a more positive approach should be taken to ensure that the LP provides for the full level of housing need that the housing assessment identifies could reasonably be associated with supporting the economic growth objectives of the Council. This would require the Plan to provide for closer to 1,060 homes per annum, or close to 15,900 homes over the plan period. Notwithstanding this, and independent of future housing at DSA as controlled by draft Policy 7, Peel contend that there is currently a shortfall of 300 committed homes within the immediate vicinity of DSA as a result of the reduced number of 450 homes now built out at Hurst Lane under application reference 09/02048/OUTM. The LP Housing needs assessment assumes full delivery of the 750 units consented on this site; if the committed shortfall not provided elsewhere in the vicinity, then there will be an under-delivery against the numbers assumed in the LP evidence base. 9.3 The recent resolution to grant outline planning permission (subject to S106 agreement) at the March 2019 DMBC Planning Committee of up to 140 new homes on land off Hayfield Lane (application reference 18/01748/OUTM), has meant that this shortfall has now effectively been reduced to 160 new homes. The principle of applying this shortfall on separate residential sites was fully accepted by the Council when the Hayfield Lane application was reported to and considered by the March 2019 Planning Committee. The Committee report stated: ’?Policy CS6 of the Core Strategy recognises that the 750 dwellings approved off Hurst Lane will provide an additional source of housing to the allocations set out in Policy CS2, and any further housing growth at Hayfield Green would not be in accordance with the Core Strategy?In practice however, the reserved matters permissions for the residential development have resulted in a shortfall of 300 dwellings at the Hurst Lane site, with the density of development being much lower than anticipated. As such, the principle of 750 homes to serve the airport and its business park is applicable, and given that the 750 homes are accounted for as additional to Doncaster’s housing growth allocations under Core Strategy policies CS2 and CS6, this planning application will go some way to making up this shortfall whilst not breaching the Councils wider housing delivery numbers. On this basis, given that development has already been previously been approved on the application site, and that there is headroom in the expected 750 dwellings to be delivered in this settlement as set out in the Core Strategy, it is considered that the principle of residential development is acceptable in accordance with the Core Strategy?In practice however, the reserved matters permissions for the residential development have resulted in a shortfall of 300 dwellings at the Hurst Lane site, with the density of development being much lower than anticipated. As such, the principle of 750 homes to serve the airport and its business park is applicable, and given that the 750 homes are accounted for as additional to Doncaster’s housing growth allocations under Core Strategy policies CS2 and CS6, this planning application will go some way to making up this shortfall whilst not breaching the Councils wider housing delivery numbers. On this basis, given that development has already been previously been approved on the application site, and that there is headroom in the expected 750 dwellings to be delivered in this settlement as set out in the Core Strategy, it

Summary:

Policy 7 does not allocate two areas of land in the masterplan: Land north of Doncaster to Lincoln railway line (946): This site is in the masterplan as a community rail station with parking and residential. This should be removed from the open countryside and allocated for residential / mixed use development. Development limits should be amended to include this. The landowner is making more detailed representations. The allocation will assist with the delivery of a community rail station in the event this option is required (if the ECML preferred line does not happen). The requests are appropriate as it is a more positive approach to providing the full level of housing need that the housing assessment identifies could be reasonably associate with supporting the Council’s economic aims, i.e. 1,060 dpa required. Notwithstanding this and independent of housing controlled in Policy 7, Peel contend there is a shortfall of 300 homes as a result of the reduction from 750 units to 450 units on the Hurst Lane application (09/02048/OUTM). The LP Housing needs assessment assumes full delivery of the 750 units consented on this site; if the committed shortfall not provided elsewhere in the vicinity, then there will be an under-delivery against the numbers assumed in the LP evidence base. Recent outline permission for 140 homes at land on Hayfield Lane reduced this to 160 dwellings. The principal of applying this shortfall was considered at planning committee, the report said: ‘?Policy CS6 of the Core Strategy recognises that the 750 dwellings approved off Hurst Lane will provide an additional source of housing to the allocations set out in Policy CS2, and any further housing growth at Hayfield Green would not be in accordance with the Core Strategy?In practice however, the reserved matters permissions for the residential development have resulted in a shortfall of 300 dwellings at the Hurst Lane site, with the density of development being much lower than anticipated. As such, the principle of 750 homes to serve the airport and its business park is applicable, and given that the 750 homes are accounted for as additional to Doncaster’s housing growth allocations under Core Strategy policies CS2 and CS6, this planning application will go some way to making up this shortfall whilst not breaching the Councils wider housing delivery numbers. On this basis, given that development has already been previously been approved on the application site, and that there is headroom in the expected 750 dwellings to be delivered in this settlement as set out in the Core Strategy, it

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is considered that the principle of residential development is acceptable in this location. Therefore, the shortfall of 160 homes serving the DSA area still remains to be delivered in line with Core Strategy Policy CS6. The allocation of Gatehouse Lane would ensure this shortfall is positively planned and accounted for in the Local Plan. It would also stop 3rd party developers speculatively claiming this shortfall and submitting speculative planning applications on less suitable sites.

Response:

Land to the south of the railway line has been set aside for a potential station site. This site is not the preferred station site and it is unclear whether or not it will be needed. Sufficient land has been accommodated to support its delivery, and there is no need to allocate land north of the railway line in addition. Re: the shortfall and whether this can be made up on other sites - this was a matter related to that planning application and was a matter of judgement for the decision maker / committee at the time. It is not part of Local Planning Policy and therefore irrelevant to decision making for the Local Plan, where the focus is on delivering the specified growth in the places it is needed. The fact less will be delivered at Hurst Lane than originally anticipated has been factored in to housing calculations.
yet going forward the Local Plan does not seem to account for any overall lapse rate. The onus should be on the

Service Town / Larger Village - Auckley-Hayfield Green

Tests of Soundness: Effective

3.1 It is considered that Site 1013 should be allocated for housing in the Local Plan, for delivery within the Plan Period. The additional land immediately north east of Site 1013 should also be either identified for development or as a Reserve Development Site. The site is unconstrained by Green Belt or Flood Risk and is located on the edge of the settlement limit of Auckley which has no allocations proposed in the Local Plan, despite its sustainability credentials and proximity to the Airport. 3.2 Prior to addressing our site-specific reasons for the inclusion of the site we have some general comments on the Draft Policy 6 as currently presented, which remains unchanged since the previous Draft Policies and Proposed Sites consultation draft in September 2018. It would be helpful if the tables referred to in Policy 6 identifying sites with planning permission and without planning permission which are included within Chapter 16 were included in summary in Policy 6. 3.3 It would be helpful if a summary table was included in Policy 6 of total permissions, total proposed allocations and total proposed requirement within each settlement, in order to demonstrate how the distribution of proposed allocations fits with the strategy. 3.4 Having calculated the information relating to existing permissions within the Tables in Chapter 16, there appears to be over 11,600 permissions (net) which are relied on for delivery within and beyond the plan period, which equates to 63% of the housing requirement. There does not appear to be any information regarding a non-implementation allowance. The Council monitor lapse permissions - indeed the Council’s latest five-year housing land supply statement recognises lapse permissions - yet going forward the Local Plan does not seem to account for any overall lapse rate. The onus should be on the Council to provide evidence to justify the application (or not) of a non-implementation / lapse rate to existing permissions. A 10% discount is an approach that has been found acceptable (fair and reasonable) in planning appeals which albeit may relate to the calculation of five-year housing land supply, is still relevant to the principle of discounting capacity from planning permissions. 3.5 Furthermore, the Local Plan should identify more sites than are required to meet the housing requirement for the Plan Period to provide a buffer to account for lack of delivery from identified allocated sites and provide for choice and competition in the market. It is clear from the Council’s own evidence that allocations don’t always deliver, with the Council having to reassess the non-delivery of UDP sites, adopted in 1998 that have not yet had planning permission approved. There still appear to be sites being taken forward as allocations that were allocations in the UDP. While there may be genuine reasons why these sites have not delivered over the last twenty years but are now considered capable of delivery, it nonetheless underlines the likelihood that some of the sites currently proposed for allocation will not come forward as anticipated. To ensure that the Plan is effective, a buffer of sites should therefore be identified. 3.6 The identification of a buffer is in line with the Framework, which requires plans to be positively prepared and flexible, and accounts for the fact that the housing requirement should be seen as a minimum. In line with the Local Plan Expert Group’s (LPEG) recommendations, a buffer equivalent to 20% of the housing requirement should be planned for (Report to the Communities Secretary and to the Minister of Housing and Planning, Appendix 1, paragraph 41). (SEE EMAIL FOR Appendix) 3.7 Taking the above into consideration, it is considered that the Local Plan needs to identify additional land for housing, in order to identify sites to meet the requirement over the whole plan period and provide a buffer of sites. Without doing so, the Plan will not be effective in delivering its housing strategy and is therefore not sound. Site 1013 - Common Lane Auckley 3.8 We have set out in the preceding section, a number of reasons why the Local Plan needs to identify additional deliverable housing sites. It is considered that Site 1013 and land immediately to the north east is available, achievable and in a suitable location on land outside the Green Belt and areas of flood risk, which is deliverable within the plan period. 3.9 As referenced in relation to Policy 2 Spatial Strategy and Settlement Hierarchy, Auckley should be treated as a standalone Larger Village, and should therefore be apportioned it’s own housing requirement in the Local Plan separate from Hayfield Green to ensure that local need is met in the village 3.10 The Publication Draft proposes no allocations in Auckley, with all of the allocated homes being located in Hayfield Green. There is one existing site with planning permission in Hayfield Green (Site 837) and one proposed allocation in Hayfield Green (Site 223 RHADS Site 2A, Hayfield Lane, Hayfield Green) with an indicative capacity of 140 dwellings. It is considered appropriate and sound to identify housing land in Auckley for delivery within the plan period. Site 1013 and the adjacent land is the only site that has been put forward on the eastern edge of Auckley. It is accessible to services and amenities in the settlement; is not located in the Green Belt, nor is it in an area of high flood risk. The allocation of site 1013 would result in an appropriate extension to the eastern edge of Auckley. The sustainable growth of Auckley would align with the proposed growth of this part of the Borough given its proximity to the Airport. 3.11 The site is located on the eastern edge of Auckley where the only existing policy constraint is the Countryside Protection Policy Area (CPPA), which is a blanket designation of countryside in the east of the borough and carries limited weight. In his report on the now withdrawn Sites and Policies DPD, the Inspector noted that the CPPA had not been assessed for its special qualities, does not have any special status and should in fact be removed as a designation. The supporting text to Core Strategy Policy CS3 states that urban extensions on land previously designated CPPA will be necessary to meet the borough’s housing and employment requirement. Now is the appropriate time to identify suitable land for delivery in the Plan period and beyond in this Designated Service Town / Larger Village which is well located to the Main Urban Area and Doncaster Sheffield Airport. 3.12 In relation to the proximity of Auckley to Doncaster Sheffield Airport (DSA), we have commented previously on the intentional creation of an aerotropolis in the Sheffield City Region with the airport’s current site (Aero Centre Yorkshire), becoming a central hub. DSA is clear that the aerotropolis would help to transform the North of England, creating 73,000 new jobs for the Sheffield City Region and providing advanced manufacturing, logistics and aviation-led innovation opportunities. It is anticipated that the vision would deliver #3.2bn GVA per year by 2048 across the region. A new railway station (the
concept of which is supported by the draft 'Strategic Transport Plan for the North') is also proposed a few minutes from Auckley. With the central hub remaining and growing in close proximity to Auckley, there is a strong logic to allocate land in this location on sites not constrained by flooding or the Green Belt. 3.13 As mentioned earlier in this statement Site 1013 has been the subject of an Outline Planning Application (17/02278/OUTM) for the Residential Development of up to 82 no. dwellings. The planning application process and the documents submitted to support it have demonstrated that there are no technical barriers to delivery. Whilst the application was refused it is considered that the reasons for refusal relating to the access point and loss of hedgerow are not insurmountable (see earlier paragraph 1.31), leaving the sole reason for refusal relating to the current site lying within the Countryside. 3.14 A summary is provided below of the formal responses received in relation to the application:

- Urban Design - No Objections o This consultation response also stated "the application is accompanied by an LVIA, the conclusions of which I am in broad agreement with. Negative landscape impacts will largely be localised and mitigated over time by the proposed layout, location of open space and mitigation measures". - Soil Profile Summaries and Droughtiness Calculations - No Objections o An 'Agricultural Land Classification and Soil Resources Report' (ALC) was submitted to the Council in October 2017. The ALC confirmed that all profiles observed on the site are limited to Subgrade 3b on soil droughtiness. Land which is classified as Grades 1, 2 and 3a in the ALC system is defined as best and most versatile agricultural land. - Mineral Safeguarding - No Objections o A Minerals Assessment Review was submitted to Doncaster MBC (June 2017) conclusion are provided at Chapter 5 with the second bullet stating "The site interrelationship with highly sensitive receptors including adjacent residential housing and would preclude mineral extraction given that the environmental and physical impact are likely to be unacceptable". - Severn Trent Water Ltd (STWL): No Objections o In October 2017 STWL stated "no objection to the proposal" subject to the inclusion of an appropriately worded condition. - Transportation - No Objections o Following the submission of further information requested in my consultation response of 25th October 2017 the Council's Transport Planner confirm that I am happy with the contents of the Transport Note dated December 2017. I have no objection from a Transportation perspective. - Drainage - No Objections o The statutory consultee response received in October 2017 confirmed there was no objections subject to the inclusion of 2 no. conditions and the applicant having regard for 10 no. informatives. - Pollution Control - No Objections o In September 2017 Regeneration & Environment confirmed "The report follows standard methodology and uses data from recognised sources, therefore its conclusions can be accepted with a high degree of confidence". - Open Space - No Objections o In October 2017 Planning Policy (Public Open Space) provided an advice note informed by relevant policies of the UDP, CS and 2013 Green Spaces Audit. The current layout and any future layout will meet these requirements and will seek to remedy local public open space deficiencies. - Education - No Objections o In September 2017 an 'Analysis of School Places' summarised "Total Education Section 106 Contribution required #425,995.00. This reflects the current position across the Hayfield Pyramid and is subject to change as new housing developments are approved which will further reduce the availability of places in the future". - Internal Drainage Board - No Objections o In October 2017 the IDB stated "the applicant should ensure that any existing or proposed surface water discharge system has adequate capacity for any increase in surface water run-off to the area". The IDB provided some further comments and recommendations all of which can be addressed at a detailed design stage or through the discharge of suitably worded conditions. - Air Quality - No Objections o An Air Quality Assessment was submitted to the Council in January 2018. The report follows standard methodology and uses data from recognised sources; therefore its proposals and conclusions can be accepted with a high degree of confidence. - Trees and Hedges - Revised Plan Submitted o A revised access drawing was submitted to the Council in February 2018 as a direct response to comments raised by the Council's Tree Officer. The revised access drawing addresses the concerns raised and retains the existing hedgerow. - South Yorkshire Police (SYP) - No Objections o In September 2017 SYP recognised that this scheme would benefit from being built to Secured by Design Standards. This would be addressed through detailed planning submissions. - Natural England (NE) - No Objections o In September 2017 NE had no comments to make on this application. - Fire Service - No Objections o In September 2017 the FS stated "access for fire appliances should comply with Building Regulations Approved Document B Volume 1-Dwelling Houses, section 11". - Ecology - No Objections o In September the Council's Ecologist commented "I agree with the ecology survey in that I don't think there is the need for any additional protected species surveys to accompany this application. The main features of interest are the boundary hedgerows from an ecology point of view. I would like the opportunity to comment on a detailed landscaping scheme for the site. The area of open space and the strip of land adjacent to the eastern boundary of the site have the potential to be planted in a manner that increases the ecological value of the site. I would also expect the landscaping to retain and enhance the existing boundary hedgerows". - Environment Agency (EA) - No Objections o In November 2017 the Environment Agency stated "no objections as not discharging to ground". - Yorkshire Wildlife Trust (YWT) - No Objections o In October 2017 the YWT stated "We have reviewed the online documents and ecological surveys, and agree with DMBC Ecologist Helen Markland that there is no need for further surveys. We also agree that the hedgerows onsite are the most important ecological feature, and we too would like the opportunity to comment on a detailed landscaping scheme for the site". - Archaeology - No Objections o In January 2018 the South Yorkshire Archaeology Service (SYAS) comments "I have now had time to review the archaeological desk-based assessment for Common Lane, Auckley, undertaken as recommended in our earlier comments. The desk-based assessment, prepared by Prospect Archaeology, examined a good range of sources and provides a thorough summation of the known archaeological resource. It concludes that there is moderate potential for the site to contain previously unrecorded archaeological remains?An archaeological evaluation of the site is required in order to provide further information on the significance of any remains on this site. This should be carried out prior to the determination of the application to allow an informed planning recommendation to be made. This is in line with paragraph 128 of the NPPF". o An archaeological evaluation of the site has now taken place. The report has not yet been published but the initial conclusions suggest there is nothing present that would be of any major archaeological interest. 3.15 Site 1013 has been found to be a sustainable site, as acknowledged by the Council during the consideration of the outline planning application. As it stands the only real barrier to development is a settlement hierarchy (informed by a settlement audit) which does not allow sufficient flexibility or apportion allocations to sustainable settlements close to the Airport and instead can only be achieved by releasing Green Belt land and reserving housing sites in flood risk areas. Auckley is a relatively sustainable Larger Village with good links to the Doncaster Main Urban Area, the M18 and Doncaster Sheffield Airport; however most importantly there are parcels of land along Common Lane (this site and the adjoining field) that can be allocated without requiring the release of Green Belt land or areas of flood risk. 3.16 The allocation of Site 1013 would provide for a mix of dwellings, including affordable housing and public open space, including an extension to the existing allotments for the benefit of the wider community. The safeguarding of land immediately adjacent to Site 1013 will contribute towards a buffer of safeguarded sites to be drawn from as required. 3.17 Whilst sites have been identified in Auckley - Hayfield Green in excess of the settlement’s identified local need requirement (with all allocated sites located in Hayfield Green) there is a case for identifying land to meet the aspirational economic growth, and the allocation of Site 1013 and the adjoining land would provide an additional supply of housing outside the Green Belt and high flood risk zones, therefore in line with national policy to significantly boost the supply of housing and in support of the aspirational economic growth of Doncaster and the wider Sheffield City Region. We therefore request that Site 1013 is identified in the Local Plan as a Housing Allocation and land immediately beyond is identified as a reserve development site.
Summary:

Site 1013 should be allocated for housing and can deliver within the plan period. Land to the north of this should be allocated or allocated as a reserve development site. The site has no flood or green belt constraints as is on the edge of the settlement limit of Auckley which has no allocations despite Airport proximity. It would be helpful if Policy 6 referred to sites with or without planning permission as per Chapter 16, and if Policy 6 included a summary of permissions and allocations for each settlement to demonstrate which fit with the strategy. There appears to be 11,600 permissions net in total (including beyond the plan period), which is 63% of the housing requirement. There is no evidence of a non-implementation allowance. The council monitor lapses, but they are not included. The onus is on the council to provide evidence to justify the application or not of a non-implementation or lapse rate to existing permissions. 10% is the approach generally found acceptable in appeals, albeit on 5 year supply - it is still relevant. The plan should identify more sites than are needed to provide a buffer to account for the lack of delivery from identified sites and provide choice and competition. It is clear sites don’t always deliver - many UDP sites have yet to and some are still in this plan. Buffers and sites should be identified, and this is in line with the framework which means plans are positively prepared and flexible and accounts for the fact the housing requirement should be seen as a minimum. In line with local plan expert group recommendations. a buffer equivalent to 20% of the housing requirement should be planned for (Report to the Communities Secretary and to the Minister of Housing and Planning, Appendix 1, paragraph 41). Site 1013 is available, achievable and in a suitable location outside the Green Belt and areas of flood risk. It is deliverable in the plan period. Auckley should be a standalone village and therefore have it’s own requirement separate from Hayfield Green. None of the existing requirement is in Auckley, it is all in Hayfield Green. Land should be sought in Auckley. This is the only site on eastern Auckley proposed. It is accessible to services and amenities in the settlement and free of constraints. It would bring sustainable growth to Auckley and align with proposed growth in the borough given it’s proximity to the airport. The site is countryside but the countryside was noted in the sites and policies DPD as not being assessed for its special qualities, does not have a special status and therefore should be removed as a designation. The supporting text to CS3 notes countryside will be needed to meet the boroughs housing and employment - now is the right time to identify land for delivery in the plan period here, and the site is in a service town village and close to the airport and urban area. The airport are aiming to create an aerotropolis and this would help transform the north of England with 73,000 jobs, investment, employment opportunities, a railway station. There is strong logic to allocate land in this location not constrained by flood risk or Green Belt. The site is subject of an outline application 17/02278/OUTM for residential development of up to 82 dwellings. The documents show there are no technical barriers to deliver. The application was refused but the reasons related to hedgerow removal can be overcome. The other reason for refusal was countryside. There were no objections otherwise from Council or external consultees. Site 1013 has been found to be sustainable as acknowledged by the Council in the outline application. The only barrier is the settlement hierarchy which is inflexible and does not account for lack of constraints, less impact on the Green Belt or airport proximity. Auckley is a relatively sustainable larger village with good links to Doncaster, the M18 and the airport and the site requires no Green Belt release, nor is it in an area of flood risk. The allocation could provide a mix of dwellings, affordable housing and open space including allotment extension. Safeguarding land adjacent could contribute to a buffer of safeguarded sites to be drawn from when required. All other sites are in Hayfield Green and there is a case for identifying land for aspirational economic growth on unconstrained land. This is in line with national policy and would significantly boost the supply of housing in support of aspirational economic growth. Request 1013 is allocated an land adjacent is identified as a reserve development site.

Response:

There is no need to allocate any more land in Auckley - Hayfield Green as the settlement can already surpass its housing target via commitments and the preferred allocation (now permission) in the settlement. The calculations do not take account of a number of additional sources of supply, including windfalls, sites with permission in defined villages, small sites of 1 - 4 units and any housing delivered as part of Policy 7. In effect, there is therefore a buffer and some protection in terms of numbers against non - delivery - although the Site Selection Methodology justifies the assumptions made about build out rates. It should also be noted that Auckley Parish Council are preparing a Neighbourhood Plan and have undertaken a Call for Sites, which may result in sites being found within Auckley itself.
3.27 The Housing Allocations required to deliver the housing requirement and distribution as set out in Policy 3, are identified by Policy 6. Site 446 (Mosham Road) is not included as an allocation (see Figure 2) and is shown to be retained within the Countryside Policy Area. This approach is considered to be unsound and also conflicts with the objectives of the DSA masterplan, which identifies the site for housing. We strongly object to the omission of the site from allocation within Policy 6 on this basis. (SEE EMAIL FOR Figure 3. Draft Publication Local Plan Policies Map Extract) 3.29 Section 4 of this representation sets out a detailed assessment of Site 446 including reference to the site context, planning history, deliverability of the site, and an assessment of alternative sites promoted for development within Auckley, in order to demonstrate that the site is appropriate and deliverable for Housing-led development. 3.30 A Mixed Use redevelopment of the site has been subject to discussions with Blaxton and Auckley Parish Councils, reflecting the potential for the site to accommodate not only residential but also employment development in association with the new railway station. As set out in Appendix 3, there is support in principle for the development of the site in order to enhance the appearance of the land and secure the benefits that could accrue from the proposed development. (SEE EMAIL FOR Appendices) 3.31 Peel Investments, as the main stakeholder in the DSA Masterplan have also confirmed their support for the development of Site 446, as set out in Appendix 4. This support reflects the importance of the site's allocation to the delivery of the masterplan and specifically the proposed railway station, which was granted planning permission under LPA ref 06/000459/FULM, and is to be located as shown in fig, 4. (SEE EMAIL FOR Figure 4. Extract from DSA Masterplan including proposed railway station) 3.32 Land at Mosham Road, Auckley to be removed from the Countryside Policy Area and allocated for Housing. Reference to also be included to the potential provision of the new railway station and associated employment uses within the allocation. 3.33 Based on the total site area of 16 hectares and a developable site area of 11 ha. taking account of the railway station (including associated infrastructure), it is suggested that the site could accommodate up to 400 dwellings, subject to further requirements for open space provision and other policy requirements. 3.34 The site should be allocated for housing-led development in order to meet the future shortmedium term housing requirement, as discussed with reference to policy 3 above. The allocation would also take the opportunity to deliver new sustainable development on brownfield land, adjacent to an existing settlement in order to meet the needs of the local population. 3.35 The allocation of the site will also support the delivery of the DSA Masterplan, including the provision of the planned new railway station (LPA ref 06/00459/FULM) within the site, and will enhance the vitality and viability of services within the existing village. 3.36 Full justification for this recommendation is set out within Section 4 of this representation and outlines that the site is suitable, deliverable and developable. The site is also demonstrated to be sequentially preferable for development against other sites within Auckley as set out in section 4 of this representation.

Summary:

Policy 6 - Housing allocations 1. None allocation of site (446) conflicts with the DSA masterplan. 2. Peel support this site (rep includes a letter of support for mixed use development of the site) 3. Lack of clear evidence to demonstrate a deliverable housing supply. 4. Fails to consider alternative to allocations which may be undeliverable. 5. Housing figure does not meet the areas objectively assessed need. 6. Site should be allocated an include reference to potential of a Railway Station and Employment opportunities.

Response:

Auckley - Hayfield Green can far surpass it’s housing target through commitments. There is also potential additional housing at the airport, tied to jobs. There is no need to allocate further land in this location.
Chapter 16: Spatial Proposals

Location issues

Pollution to surface water

Location

access to bus/train network, capacity of local schools

access to bus/train network, capacity of local schools

201 Constraints:

Pollution to surface water bodies

Health & Safety risks

Flood Zone 2

access to

Deliverable units (48) are above the settlements need requirement

access to bus/train network, capacity of local schools

Reference: 422 Constraints: Rejected site:

Major archaeological protection concerns

Development of 940 units is subject to the delivery of jobs at the airport with the exception of 280 dwellings

access to bus/train network, capacity of local schools

Policy:

Service Town/Village - Auckley-Hayfield Green

Tests of Soundness:

Comment:

4.54 The Site Selection Methodology which forms part of the Local Plan evidence base provides an overview of how the Council has assessed potential housing site options within the plan area. 4.55 A total of 14 potential development sites have been identified within Auckley. In order to demonstrate the suitability of the Mosham Road site, the remaining 13 sites within the settlement have also been considered and a summary of the results is provided in the table below. Table 1 - Assessment of alternative sites within Auckley/Hayfield Green Reference: 007 Constraints: Rejected site: - Flood risk area (Zone 2 and 3) - Fails the flood risk sequential test - Pollution to surface water bodies - Location issues- access to bus/train network, capacity of local schools Reference: 049 Constraints: Rejected site: - Deliverable units (36) are above the settlements need requirement - Location issues- access to bus and train network, capacity of local schools Reference: 174 Constraints: Rejected site: - Flood Zone 2 and within an EA flood warning area - Location issues- access to bus/train network, capacity of local schools Reference: 201 Constraints: Rejected site: - Deliverable units (48) are above the settlements need requirement - Location issues- access to bus and train network, capacity of local schools and access to existing centre Reference: 223 Constraints: Proposed site however there are location issues with limited access to the train station and the proximity to the existing centre. Reference: 299 Constraints: Rejected site: Deliverable units (276) are above the settlements need requirement Highways issues Location issues- access to bus/train network and access to services such as GPs and schools Pollution to surface water bodies Reference: 330 Constraints: Rejected site: - Deliverable units (28) are above the settlements need requirement - Location issues- access to bus/train network, capacity of local schools Reference: 422 Constraints: Rejected site: - Deliverable units (30) are above the settlements need requirement - Location issues- access to train network, capacity of local schools - No defensible boundary Reference: 464 Constraints: Rejected site: - Flood Zone 3 - Health & Safety risks - Biodiversity concerns- overlays a local wildlife site - Location issues- access to bus/train network, capacity of local schools - Heritage impacts Reference: 940 Constraints: Proposed conditional housing site: - Development of 940 units is subject to the delivery of jobs at the airport with the exception of 280 dwellings - Local policy constraints - Highway access issues - Heritage issues - Groundwater source protection concerns - Location issues- proximity to existing centre, train station, GPs and schools. - Biodiversity issues - Major archaeological concerns - Pollution to surface water bodies Reference: 1010 Constraints: Rejected site: - Deliverable units (162) are above the settlements need requirement - Pollution to surface water bodies Reference: 1013 Constraints: Rejected site: - Deliverable units (155) are above the settlements need requirement - No defensible boundary - Location issues- access to bus/train network, capacity of local schools - 4.56 Of the above sites, those identified in red and orange are considered to be more constrained and/or less sustainable than the Mosham Road site for the reasons identified. 4.57 Site 223 is coded green. It is located immediately to the south of the Mosham Road site beyond the railway line and has been partially developed previously for employment uses. The southern platform of the proposed new railway station would be located within this site if delivered and will occupy a significant proportion of the remaining available land. It is considered that any unused land could be bought forward for employment uses to reflect the existing uses at the entrance to the site. 4.58 Site 940, is proposed conditionally for housing in accordance with Policy 7 of the Publication Local Plan. However, there are a number of constraints relating to this site, as mentioned in the table above. The key constraint relates to the development being conditioned and reliant upon the delivery of jobs at the airport. There is no accurate method by which to calculate when the site may be delivered and the provision of housing within this location will not support the vitality or viability of existing settlements to the same degree as site 446, given the separation of the site from the established villages. Conclusions 4.59 Site 446 provides the opportunity to deliver additional, sustainably located housing adjacent to the existing settlement of Auckley. 4.60 The site has no overriding environmental constraints and would have significant positive effect through the removal of contaminated land. The site is available and deliverable in the short term and represents the most sustainably located site for housing within the Auckley - Hayfield Green area. 4.61 Based on the above information, the site is capable of delivering housing and employment development in the short term, if allocated for Mixed Use within the emerging Local Plan. This approach would ensure the soundness of the Local Plan and support delivery of the DSA Masterplan and the proposed railway station.

Summary:

14 sites have been identified in Auckley. To demonstrate the suitability of the Mosham Road site, an assessment of the other 13 sites has been undertaken: 007 Constraints: Rejected site: - Flood risk area (Zone 2 and 3) - Fails the flood risk sequential test - Pollution to surface water bodies - Location issues- access to bus/train network, capacity of local schools - Deliverable units (36) are above the settlements need requirement - Location issues- access to bus and train network, capacity of local schools 174 Constraints: Rejected site: - Flood Zone 2 and within an EA flood warning area - Location issues- access to bus/train network, capacity of local schools - Deliverable units (48) are above the settlements need requirement - Location issues- access to bus and train network, capacity of local schools and access to existing centre 223 Constraints: Proposed site however there are location issues with limited access to the train station and the proximity to the existing centre. 299 Constraints: Rejected site: Deliverable units (276) are above the settlements need requirement Highways issues Location issues- access to bus/train network and access to services such as GPs and schools Pollution to surface water bodies 330 Constraints: Rejected site: - Deliverable units (28) are above the settlements need requirement - Location issues- access to bus/train network, capacity of local schools - No defensible boundary - Location issues- access to bus and train network, capacity of local schools - Development of 940 units is subject to the delivery of jobs at the airport with the exception of 280 dwellings - Local policy constraints - Highway access issues - Heritage issues - Groundwater source protection concerns - Location issues- proximity to existing centre, train station, GPs and schools. - Biodiversity issues - Major archaeological concerns - Pollution to surface water bodies Reference: 1010 Constraints: Rejected site: - Deliverable units (162) are above the settlements need requirement - Pollution to surface water bodies Reference: 1013 Constraints: Rejected site: - Deliverable units (155) are above the settlements need requirement - No defensible boundary - Location issues- access to bus/train network, capacity of local schools - 4.56 Of the above sites, those identified in red and orange are considered to be more constrained and/or less sustainable than the Mosham Road site for the reasons identified. 4.57 Site 223 is coded green. It is located immediately to the south of the Mosham Road site beyond the railway line and has been partially developed previously for employment uses. The southern platform of the proposed new railway station would be located within this site if delivered and will occupy a significant proportion of the remaining available land. It is considered that any unused land could be bought forward for employment uses to reflect the existing uses at the entrance to the site. 4.58 Site 940, is proposed conditionally for housing in accordance with Policy 7 of the Publication Local Plan. However, there are a number of constraints relating to this site, as mentioned in the table above. The key constraint relates to the development being conditioned and reliant upon the delivery of jobs at the airport. There is no accurate method by which to calculate when the site may be delivered and the provision of housing within this location will not support the vitality or viability of existing settlements to the same degree as site 446, given the separation of the site from the established villages. Conclusions 4.59 Site 446 provides the opportunity to deliver additional, sustainably located housing adjacent to the existing settlement of Auckley. 4.60 The site has no overriding environmental constraints and would have significant positive effect through the removal of contaminated land. The site is available and deliverable in the short term and represents the most sustainably located site for housing within the Auckley - Hayfield Green area. 4.61 Based on the above information, the site is capable of delivering housing and employment development in the short term, if allocated for Mixed Use within the emerging Local Plan. This approach would ensure the soundness of the Local Plan and support delivery of the DSA Masterplan and the proposed railway station.
bus/train network, capacity of local schools 422 Constraints: Rejected site: - Deliverable units (30) are above the settlements need requirement - Location issues- access to train network, capacity of local schools - No defensible boundary 464 Constraints: Rejected site: - Flood Zone 3 - Health & Safety risks - Biodiversity concerns- overlays a local wildlife site - Location issues- access to bus/train network, capacity of local schools - Pollution to surface water bodies 832 Constraints: Rejected site: - Deliverable units (63) are above the settlements need requirement - Location issues- access to bus/train network, capacity of local schools - Heritage Impacts 940 Constraints: Proposed conditional housing site: - Development of 940 units is subject to the delivery of jobs at the airport with the exception of 280 dwellings - Local policy constraints - Highway access issues - Heritage issues - Groundwater source protection concerns - Location issues - proximity to existing centre, train station, GPs and schools. - Biodiversity issues - Major archaeological concerns - Pollution to surface water bodies 1010 Constraints: Rejected site: - Deliverable units (162) are above the settlements need requirement - Pollution to surface water bodies 1013 Constraints: Rejected site: - Deliverable units (155) are above the settlements need requirement - No defensible boundary - Location issues- access to bus/train network, capacity of local schools - With the exception of 223 and 940, all sites above are considered to be more constrained / less sustainable than 446 (Mosham Road). 223 is not - it is located immediately to the south of the Mosham Road site beyond the railway line and has been partially developed previously for employment uses. The southern platform of the proposed new railway station would be located within this site if delivered and will occupy a significant proportion of the remaining available land. It is considered that any unused land could be bought forward for employment uses to reflect the existing uses at the entrance to the site. 940 is a conditional allocation with numerous constraints. There is uncertainty about how much will therefore be delivered.

Response:
No further land is required in this location due to existing commitments. The settlement can meet and surpass its housing targets without allocating any more sites. 940 will deliver housing linked to job delivery at the airport, this is separate to the allocated requirement, which is met via permissions at Hurst Lane and Hayfield Lane.

C/Site 446: Introduction/05214/1/002

Organisation: DLP

Representing: South Yorkshire Housing Association

Comment Ref: Attend Hearing

Reason: To support the representation and Inspectors understanding of the site.

Area: Chapter 16: Spatial Proposals

Policy: Service Town/Village - Auckley-Hayfield Green

Tests of Soundness: Positively prepared - Effective

Comment:

2.1 This representation is made to the Doncaster Local Plan Publication Policies & Proposed Sites Consultation on behalf of SYHA Enterprises Ltd and A.A. Lund and relates to the site identified under Local Plan reference 446 as 'Blaxton Quarry Phase 2, Mosham Road, Auckley' (Fig. 1). 2.2 The Lund family has promoted Site 446 for development through the Local Plan consultation period for in excess of 15 years and during this period has engaged with local stakeholders including the Parish Council to secure stakeholder support for the appropriate development of the site. 2.3 Most recently submissions have been made to the informal consultation on the Draft Policies and Proposed Sites held between September - October 2018 and the Auckley Neighbourhood Development Plan consultation held in September 2018. 2.4 SYHA Enterprises Ltd is a housing association providing homes across the South Yorkshire Region. Their current growth strategy is to promote the delivery of housing-led and mixed use development sites, in order to facilitate the delivery of affordable housing. (SEE EMAIL FOR Figure 2. Site location Plan) 2.5 The site is sustainably located adjacent to the villages of Auckley and Blaxton and is brownfield land, as confirmed within the Walker Morris representation at Appendix 1, which concludes that the Site has not blended into the landscape and is not subject to any development management procedures to restore the land. The Site is therefore previously developed land and its redevelopment should be a priority, in accordance with the Framework and draft Local Plan policies. (SEE EMAIL FOR Appendices) 2.6 The site is also identified within the Doncaster Sheffield Airport (DSA) Masterplan Area. The Masterplan Consultation document (2018) identifies the site for the future delivery of housing in order to support the wider economic growth aspirations of the airport. The DSA Masterplan has been prepared by Peel Investments, as majority landowner, together with support from stakeholders including Doncaster Council. 2.7 Despite this, the site is indicated to be retained within a Countryside Policy Area in the draft Local Plan. DLP strongly objects to the omission of the site from the proposed Housing and/or potentially Employment allocations. 2.8 To this end, this representation considers the strategic approach to housing and employment delivery within the draft Local Plan and makes recommendations for amendments to specific policies in order to ensure the soundness of the plan. 2.9 The recommendations and accompanying justification set out the sustainable and extensive site specific characteristics, which indicate that Site 446 is an appropriate location for new development.

Summary:
Site 446 should be allocated for housing. The site is previously developed. It is a well located site and part of the DSA masterplan area. Strongly object to this being allocated as countryside and the site is appropriate for development. Site has been promoted to the Council and the Neighbourhood Plan.

Response:
The site has been allocated countryside as per the development limits methodology. There is no need to allocate more housing in this location.
Comment Ref: C/Site 446:Executive Sum/05214/1/001

Attend Examination: Attend Hearing

Reason: To support the representation and inspectors understanding of the site.

Area: Chapter 16: Spatial Proposals

Policy: Service Town/Village - Auckley-Hayfield Green

Tests of Soundness: Positively prepared  Effective  Justified  Consistent with national

1.1 These representations are made on behalf of SYHA Enterprises Ltd and the Lund Family (as landowner) in response to the Doncaster Local Plan consultation 2019. These comments follow the extensive promotion of land south of Mosham Road, Auckley during previous consultation on the new Doncaster Local Plan. 1.2 This representation is made on the basis that the Doncaster Local Plan Publication draft, as prepared, contains significant deficiencies, in relation to the Site; the Strategic Policies and the Distribution of Growth. 1.3 DLP Planning Ltd is of the view that in order to provide for strategic housing requirements and sustained economic growth and regeneration of the Doncaster area, there will be a requirement for the allocation of relatively unconstrained land surrounding existing settlements to support the sustainable growth of the Borough. 1.4 It is our opinion that the level of housing and employment development discussed within this representation can only be delivered through the release of additional, unconstrained and underused sites that are attractive to the market. Such releases should be made in locations which meet other objectives such as the regeneration of Doncaster, realising the potential of airport, and the redevelopment of former mineral sites. 1.5 The release of brownfield land such as the site at Mosham Road, Auckley in these circumstances will increase the supply of allocations from brownfield land, in accordance with the National Planning Policy Framework, from the current figure of 41% of allocated land within the draft local plan. It will also minimise the need for Green Belt release in other locations. 1.6 We consider that there is significant scope within Auckley and Hayfield Green in particular to build upon the employment opportunities created by the airport to support the future sustainability of existing settlements. Land at the Former Blaxton Quarry, situated east of the site subject of these representations, is identified as an ‘Employment Allocation with Permission’ (Policy 4) (under 09/01292/OUTM as amended via 14/00877/WCC) in the Pre-Submission Local Plan. This site is within the Lund’s ownership and further reflects the support for economic development in this part of the plan area. 1.7 The Mosham Road site (LPA ref 446) subject of this representation, is located between the site of the proposed Airport railway station and the village of Auckley and is identified within the DSA Masterplan as an area for future housing delivery (see Figure 1 below). It is considered that this land can play an important role in delivering Local Plan objectives in this regard. (SEE EMAIL FOR Figure 1. DSA Masterplan Area (Mosham Road Site and location of proposed Lincoln Line Station indicated in red)) 1.8 In order to realise the potential of this site, this representation raises objections to a number of policies as drafted and sets out recommendations for proposed amendments, in order to ensure the soundness of the Local Plan.

Summary:
To support Local Plan sustained economic growth and strategic housing there will need to be a release of relatively unconstrained land around existing settlements that are attractive to the market. Local Plan has significant deficiencies. Such release should be in locations to meet regeneration objectives, support airport potential and redevelop former minerals sites. Site is brownfield and will increase amount of brownfield land in the plan from 41% currently, as well as minimising the need to release Green Belt. There is scope to build on airport employment opportunities and support future sustainability of existing settlements. Site is identified in the DSA masterplan. Object to a number of policies as drafted.

Response:
There is no need to allocate further land in this settlement for housing as it can meet and surpass its targets, and there is also potential additional housing being allocated adjacent to the airport linked to the proven delivery of jobs. Sites would still be needed in other settlements in the borough so this would not negate the need for Green Belt allocations, as per the Green Belt Topic Paper.
Tests of Soundness:

Comment:

Site and Context 4.1 The site referred to as 'Blaxton Quarry Phase 2, Mosham Road, Auckley' (Local Plan ref 446) is shown in Fig. 3. (SEE EMAIL FOR Figure 6. Location Plan) 4.2 The site is located immediately north of the Doncaster to Lincoln railway line, and to the south of Mosham Road, Auckley in Doncaster. The site is well defined by existing landscape features including hedgerows to site boundaries. 4.3 It is approximately 16 hectares in size and was previously worked for mineral extraction although this use has now ceased. Other quarries lie to the east and the west of the site with residential development to the north and south of the site, beyond the railway line. 4.4 There was no specific conditional requirement to comprehensively restore the site following mineral extraction and no topsoil remains. The site has only been backfilled to a limited degree. 4.5 The southern boundary of the site fronts onto a railway line, with housing beyond. Hurst Lane and Gatehouse Lane/Mosham Road adjoining the eastern and western boundaries respectively. Overall the site is enclosed being bounded by road and rail corridors, with residential, amenity, and commercial uses in adjacent areas. 4.6 The site is accessible to the strategic motorway network. The M18, A1(M) and the M180 run through the Doncaster area. Access to the motorway network can be gained from the A614 to the M180, M18/M62 and the A638 to the A1 (M). 4.7 Immediate road access to the site is via Hurst Lane, which runs south to the A638 (Great North Road). A route north from the site is provided by the A614. 4.8 The new railway station to serve the airport site and surrounding area is proposed on the part of the railway line directly adjacent to the site, for which planning permission (LPA ref 06/000459/FUULM) has previously been granted. Those exiting the northern platform would gain access to the local road network through the Mosham Road site. The strategically important nature of the sites location is illustrated in Fig. 7 in relation to the airport site, neighbouring villages and the employment area at the l-port to the west. (SEE EMAIL FOR Figure 7. Location of Site 446 within local context) Current UDP Designation 4.9 The site is allocated as Countryside in the adopted Doncaster UDP. Policy ENV2 outlines the principles for this policy area and policy ENV4 sets out criteria under which development may be undertaken are the relevant policies for the site. 4.10 It is considered that this policy guidance is outdated and no longer reflects the strategic and economic requirements which are relevant to the area today. It is evident that there is a need to provide additional housing, employment and investment in the locality and improve the overall physical quality of the environment. 4.11 Overall it is considered that the site can accommodate up to 400 dwellings together with landscape and open space requirements and alongside provision of the proposed railway station and associated infrastructure. 4.12 The site represents a significant opportunity to deliver much needed affordable homes and key worker accommodation for the rapidly expanding airport and its surrounding business park. This is particularly given the support from SYHA Enterprises. DSA Masterplan 4.13 As set out within this representation, the DSA Masterplan includes Site 446, which is shown for housing. The site is also anticipated to include the northern platform of the proposed DSA railway station. The railway station offers the opportunity to provide frequent public transport connections towards Sheffield and Lincoln. 4.14 The station would make the site an extremely sustainable location for housing development in terms of access to public transport, giving residents access to surrounding areas without being dependent on the car, which would promote sustainable transport in the area. 4.15 The development of the site for housing-led development alongside the delivery of the new railway station would create a highly sustainable link between the settlement of Auckley and the wider area. Proposed Housing Allocation 4.16 In order to ensure that there is a sufficient and suitable supply of land to deliver their housing and previously developed land objectives, Local Planning Authorities are required at the local level to identify broad locations and specific sites which will enable a continuous delivery of housing for at least 15 years. Local Planning Authorities are also required to identify a further five years supply of specific housing sites for years 6-10 that are developable, and if possible specific sites for years 11-15 but if not broad locations for future growth. 4.17 Specifically, Local Planning Authorities should identify sufficient deliverable sites for the first five years, to be considered deliverable sites, at the point of adoption of the Local Plan. 4.18 For sites to be deliverable they need to be: available (the site is available now), suitable (development of the site would contribute to the creation of sustainable communities) and achievable (there is a reasonable prospect that housing on the site will be deliverable on the site within 5 years). Deliverability 4.19 It is considered that this site can be comprehensively developed to deliver residential and employment uses together with commercial uses, which will complement the commercial development of the Airport and its hinterland. 4.20 Also included within this is the potential for the site to accommodate a new rail station to serve the new Airport and future industry. The planning permission for the Airport also included a new rail station to be located in part within the boundary of the site. Given that Doncaster at present has a lack of rail connected employment sites, this site provides real potential for delivering employment together with a transport interchange. 4.21 Comprehensive planned development around the airport is critically important, both to the long term success of the airport and the economic benefits it can bring, and to ensure that any environmental impacts are fully assessed, controlled and mitigated. The Mosham Road site is identified within the DSA Masterplan for housing as part of proposals to support the growth of the airport. It is unclear as to why the Council had not reflected this aspiration within the Local Plan as part of draft Policy 7. 4.22 The site is being jointly promoted by a housing association, who would look to deliver affordable housing as part of any proposal for the site. The Doncaster Housing Strategy document confirms that: "We are generally supportive of new affordable housing development in this area due to the amount of economic development taking place in the area around the airport, which is expanding its operations, and the number of jobs that are expected to be created in the near vicinity as a result of completing the airport link road 'the great Yorkshire Way'. 4.23 The figures collected by SYHA for housing bids in the period 2016-2018 confirm that there is a shortage of housing available for Auckley, Blaxton and Finningley. For example, no three bed units became available for the two years to the end of August 2018. 4.24 The figures however showed clear demand in the area for affordable housing in
Auckley, as the latest figures show that 117 people bid for one of the 3 beds that became available in the year ending August 2018 and two bed demand was also noted. 4.25 The provision of housing within the site would therefore address current need within the housing market.

Available & Achievable 4.26 The site is within the ownership of one land owner and therefore development of the site can be undertaken comprehensively. The landowner has promoted the site for development through the local plan preparatory process demonstrating their commitment to bring the site forward. 4.27 The proposals also have the support of SYHA Enterprises Ltd, who are an affordable housing provider and operator, committed to the delivery of the proposals to meet a range of housing needs within the locality. Suitable 4.28 It is considered that the site is located within a suitable location for development and would not only help to deliver Doncaster’s strategic employment and housing requirements but assist in providing market and affordable housing in an area in need of regeneration. Development on the site would also lead to the creation of a sustainable community. 4.29 The site and the surrounding area does not lie within the Doncaster Green Belt or within a floodplain therefore making allocation and subsequent development on the site more acceptable than would otherwise be the case. 4.30 Extensive site investigation reports have previously been undertaken to support earlier representations. The nature of the site and the individual characteristics of the area indicate that there are very few identified physical or environmental constraints to future development. 4.31 The site is well located in relation to the local schools and bus stops, providing access to settlements with a wider range of services and facilities. The site itself is bound by treeline which provides some separation from the wider countryside and as the site is situated between two residential areas, development would provide a logical extension to the south of the village between the two residential areas. 4.32 The site adjoins the existing settlement boundary of Auckley, which offers a range of services. The site lies in close proximity to a range of public services and facilities including: - The Hayfield School (320m) - St Saviour’s Church (500m) - Hayfield Lane Primary School (600m) - Nisa Local (650m) - Auckley Post Office (500m) - Co-op Food Auckley (550m) - Walkers Nurseries & Garden Centre (750m) - TaleGate Theatre (1km) - Eagle and Child Inn (1km) - Auckley Friery (900m) - Yorkshire Wildlife Park (1.7km) - Doncaster Sheffield Airport (1.5km) - Prospective employment site directly adjacent 4.33 The site is accessible by public transport with the nearest bus stop being located approximately 330m from the site on Hurst Lane. The services running from this location connect the site to Auckley, Doncaster Town Centre and Doncaster Sheffield Airport and include the following: - No. 57a: Doncaster - Cantley - No. 57c: Doncaster - Auckley - No. 588: Tickhill - Cantley - No. 57f: Doncaster - Finningley 4.34 The site currently benefits from informal access points on the western boundary and both Hurst Lane and Mosham Road benefit from footpaths and grass verges along the length of the site boundary, leading to adjacent residential areas. A vehicular access point could be achieved from Mosham Road to provide access to the adopted highway. 4.35 Additionally, the development of the Great Yorkshire Way link road between the M18 (junction 3) and the airport and the proposals for a new rail link significantly enhance the accessibility of the site. 4.36 The most recently available Housing and Economic Land Availability Assessment (HELAA) published July 2019 but with an April 2018 base data, identified the site under reference: 446 - Blaxton Quarry Phase 2, Mosham Road, Auckley. 4.37 The HELAA assessment identified that the site: - Has no physical constraints - Has no availability constraints - is suitable but with local policy constraints - is developable in a timeframe of 0-15 years for 357 units. 4.38 The Environmental Agency’s Magic Maps database indicates that the site is not subject to any environmental constraints or designations. 4.39 The site is entirely located in Flood Zone 1, as such it is considered to be at the lowest risk of flooding and is therefore suitable for residential development. Capacity 4.40 The site area extends to approximately 16 hectares and is considered to have capacity for up to 400 dwellings including landscape buffers and in addition to the proposed railway station and associated infrastructure. The allocation of this site for housing/employment would create a practical development to the south of Auckley. Landscape/Visual Impact 4.41 The landscape character of the site can be described as undulating with little hedge or field boundaries. The site displays an overall character of a degraded landscape with limited vegetation and a vacant land use. The lower land level generally curtails long distance views across the site. 4.42 It is our opinion that the poor quality degraded nature of the landscape can effectively accommodated change without having a detrimental impact upon the landscape and its surroundings. The ability of the site to accommodate change is determined by the diversity and value of elements within the site which are in this case degraded and of little landscape value in terms of their contribution to character and as such are considered to be of poor value. 4.43 The site is distinctly different in character to that of the land to the north of the site, which is more connected to the rural area. It is considered that mixed use development at the site would form a natural extension to the built form of the airport and its hinterland. 4.44 The character of the area is also assessed in the Council’s Landscape Character Assessment of Doncaster Borough published in March 2007. The Study was undertaken to inform the Doncaster LDF and includes landscape character descriptions, landscape capacity and design guidance for each landscape character area. A detailed strategic employment survey of the area to the north of the Airport has been undertaken. The area is described as a small area which extends from the settlements of West Barrier to Finningley and from the B road through Blaxton to the north and the existing airport infrastructure to the south. 4.45 It describes the area as fragmented with diverse land uses which include horticultural nurseries with lines of ornamental conifers; sand and gravel quarries; a well screened railway on an embankment; busy B roads and a partially tree screened fuel depot for the airport. Part of this area to the north of the airport is currently under development for large-scale strategic employment. Land to the west of the B1396 is currently being developed with new housing. There are isolated remnants of farmland, including pasture for bulls, with no readily identifiable arable field pattern. These are not easily viewed being surrounded by urban influences. 4.46 It describes the area as neither tranquil nor remote and is already surrounded and heavily influenced by new and existing urban development. It has an indistinct character, is in poor condition and is already isolated from rural influences. Therefore the landscape quality and value is considered low. 4.47 Due to the existing urban influences and the fragmented nature of much of the landscape strategic employment development would have a limited landscape impact. However, it would erase remnants which are not large enough to create a pattern. Any such a development would also fit with existing boundary lines and with appropriate treatment of the landscape has the potential to improve and unify this diverse landscape. However it would be very visible locally, such as from the new housing estate to the west of the B1396 and for residents on the southern edge of Blaxton, it would be visible from further away due to existing woodland and the well treed embankment. 4.48 Overall the landscape capacity for strategic employment on the northern edge of Doncaster Sheffield Airport is judged to be high. Based on this, it should also be considered that the landscape has the capacity to accommodate built development whether it is employment or housing development. 4.49 Golder Associates (UK) Ltd. were commissioned to carry out further landscape assessment to examine in greater detail localised areas where there is considered to be pressure for housing and/or strategic employment development. However this only relates to the area immediately to the west of the airport run way i.e. the area proposed for allocation under Policy 7 and therefore the 2007 Landscape Character Assessment is considered to remain the most relevant evidence to the consideration of the Mosham Road site. Soils 4.50 Due to extensive sand and gravel extraction there is limited soil resource across the site. The site is generally degraded and bereft of any top soils. Ecology 4.51 With regards to wildlife there is no indication of any protected plants or species existing within or using the site. Development of the site and the subsequent introduction of additional planting and potential wildlife habitats will assist in helping to attract and encourage wildlife to the area. 4.52 In conclusion, the environmental impacts from development of this vacant underused site are considered to be low and any concerns related to landscape or noise can be designed out of any scheme. New housing would support social, economic and aesthetic needs in the locality and provide for an enhanced environment. 4.53 Overall as a site, which is located on the fringes of the built up fringes of the airport, this site performs well in sustainability terms and can make an important contribution to the delivery of Doncaster’s housing trajectory.
Summary:
The site is well defined by existing landscape features. It was used for minerals extraction but no more. There is no condition to comprehensively restore the site following minerals extraction and no topsoil remains. Site has been backfilled to a limited degree. The site is enclosed by infrastructure. It has access to local and national road networks. It is well located for the airport and iport as well as neighbouring villages. It is allocated as countryside in the UDP which is outdated. There is a need for more employment and housing in the area and to improve the overall quality of the environment. Site can deliver up to 400 dwellings with landscaping and open space. It can deliver affordable homes and worker accommodation for the airport. Has support from South Yorkshire Housing Association and is included in the DSA masterplan and there is a railway station earmarked for the adjacent line. This would make for a very sustainable location for housing and promote sustainable transport. The site is suitable, available and deliverable. It can be delivered for housing and commercial uses together. Unclear why the Council are not reflecting the airport masterplan and supporting the site given the benefits. There is clear need for affordable housing in Auckley as shown in data collected by SYHA 2016 - 2018. 117 people bid for 1 3 bed flat in year ending August 2018. Site in single ownership and close to local services including schools and shops. Also accessible by car and bus to central Doncaster. HELAA found that site is suitable but with local constraints. The site has a degraded landscape meaning change will not be detrimental to the overall landscape. Land to the north of the site is more rural but this land is within a more urbanised area. Has capacity therefore for built development. No ecological concerns. New housing would support an enhanced environment. It is on the fringes of the built up fringes of the airport and performs well in sustainability terms.

Response:
The site has been allocated countryside as per the development limits methodology. There is no need to allocate more housing in this location. Policy 7 is specifically related to the airport and airport related development and provides for a significant amount of housing tied to the delivery of jobs, and supports elements of the draft airport masterplan - however this is an independent document and the Local Plan's role is not to reflect this verbatim, rather it supports certain elements of it.
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**Comment Ref:** /Site 446: Introduction/05286/1/001

**Attend Examination:** Attend Hearing

**Reason:** To consider the housing requirement, errors in the Sustainability Appraisal, legal definition of previously developed land in relation to site ref: 446.

**Area:** Chapter 16: Spatial Proposals

**Policy:** Service Town/Village - Auckley-Hayfield Green

**Tests of Soundness:**
- Justified
- Effective
- Consistent with national

**Comment:**

> 1.1 These representations have been prepared on behalf of A.A. Lund in response to the Doncaster Local Plan Publication Version consultation (Regulation 19). 1.2 These representations can be read alongside those prepared by Clare Plant MRTPi AssocRICS of DLP Planning Ltd and John Goodall MRTPi also of DLP Planning Ltd. The objections raised in those representations are not repeated here, (but should be treated as so repeated) which also represent our client’s position on the Publication Version of the Doncaster Local Plan. 1.3 Our client owns the land east of Hurst Lane, Auckley (SEA site ref: 446) and has been engaged in promoting the site for mixed use development for a number of years. The Publication Local Plan proposals map indicates that the land will be identified as ‘Countryside’, where policy 26 in the Publication Local Plan restricts most forms of development. Our client objects to the proposed inclusion of this land as ‘Countryside’ and endorses the objections made by Clare Plant and John Goodall in their representations.

**Summary:**

Site 446 is being promoted for mixed use and should not be allocated as countryside.

**Response:**

Noted. The site is allocated countryside as per the Development Limits Methodology, and no further housing is required in this location.
Tests of Soundness:

Comment:

7.1 The Doncaster Local Plan Publication draft, as prepared, contains significant deficiencies, in relation to the Site; the strategic policies and the distribution of growth. 7.2 The objections prepared by Walker Morris LLP and DLP Planning Ltd highlight these deficiencies; explain why the Local Plan is unsound and, where necessary, explain how this can be overcome. 7.3 This representation provides a legal interpretation of the definition of 'previously developed land' and concludes that the Site has not blended into the landscape and is not subject to any development management procedures to restore the land. The Site is therefore previously developed land and its redevelopment should be a priority, in accordance with the Framework and draft Local Plan policies.

Summary:

Conclusion The Doncaster Local Plan Publication draft, as prepared, contains significant deficiencies, in relation to the Site; the strategic policies and the distribution of growth. Representation provides a legal interpretation of the definition of 'previously developed land' and concludes that the Site has not blended into the landscape and is not subject to any development management procedures to restore the land. The Site is therefore previously developed land and its redevelopment should be a priority.

Response:

This site is considered to be a greenfield site as it had restoration conditions attached to the permission. Furthermore, there is no need to allocate further housing land at Auckley - Hayfield Green, and the site is also within the Countryside.
### Tests of Soundness:

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### Comment:

4.1 There is a policy presumption in favour of considering brownfield land in preference to other sites. 4.2 The National Planning Policy Framework 4.3 Paragraph 117 of the Framework endorses a 'brownfield first' approach to promoting land to meet the need for homes "in a way that makes as much use as possible of previously developed or 'brownfield land'". 4.4 Paragraph 118.c) of the Framework is requires planning policies to give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. Paragraph 118.c) also promotes and supports the development of under-utilised land and buildings, especially where it would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively. 4.5 In Doncaster, where Green Belt land is being released for housing, paragraph 137 of the Framework is notable and significant to the consideration of previously developed land. Paragraph 137 requires local planning authorities to have examined fully all reasonable alternatives to meeting its identified need, before exceptional circumstances exist to justify the release of Green Belt land. 4.6 Doncaster Local Plan Publication Draft 4.7 The presumption in favour of considering brownfield land first is also a policy requirement and objective in the subject Doncaster Local Plan Publication draft. Paragraph 3.5 lists a series of objectives in order to achieve the Local Plan's objectives. These include: 4.7.1 encourage the re-use of sites and buildings, especially well located and underused brownfield land (e.g. redundant/unused land and empty properties and underused floorspace) to help revitalise areas of low demand and stimulate growth; 4.8 The 'Plan, Monitor and Manage' definition in the Glossary of the Local Plan reinforces the priority to use brownfield sites first, stating: 4.8.1 Approach to housing delivery replacing predict and provide, housing sites are released (i.e. granted planning permission) only as and when they are needed so as to avoid an oversupply of land and so that development can be tied to planned infrastructure improvements and meet sustainability objectives such as ensuring brownfield sites are developed before greenfield sites. 4.9 This representation raises no specific objections to the aims and objectives of the Local Plan or its preference to using brownfield land first. The objection focuses on the misapplication of the Framework's and Publication Local Plan's policies to brownfield sites. The Site is previously developed and its re-use for housing or an alternative use is encouraged in the Local Plan and Framework. The site scoring in the Sustainability Appraisal, which ultimately feeds into the prospective allocation of land in the Local Plan, is flawed and does not give priority to previously developed sites such as this. 4.10 It is notable that the Local Plan Publication draft proposes the release of land from the Green Belt to meet its identified housing need, while brownfield sites adjacent to villages such as this are prospectively retained as Countryside. 4.11 The allocations in the Local Plan Publication draft are contingent on accurate scoring in the Sustainability Appraisal. Whilst the Local Plan policies seek to give priority to brownfield land first, this objective is not carried through in the Sustainability Appraisal or the identification of land for housing. Consequently the evidence on which the Local Plan allocations are based is inaccurate and the Local Plan is unsound and inconsistent with national policy. The omissions in the Sustainability Appraisal also fail to consider reasonable alternatives to Green Belt release, and release of greenfield land, while brownfield land is available. The Local Plan is therefore unsound and fails to meet the 'Justified' test in the Framework.

### Summary:

Policy presumption that brownfield should be considered in preference to other sites. NPPF para 117 endorses a brownfield first approach and 118c also promotes and supports the development of under-utilised land and buildings, especially where it would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively. 137 gives consideration to brownfield land where Green Belt release is being considered before exceptional circumstances are justifiable. Presumption in favour of brownfield is also a policy requirement and objective of the Local Plan. As the site is brownfield it should be prioritised as a consideration for allocation and re-use. Sustainability Appraisal scoring is flawed and does not prioritise brownfield land despite this being a Local Plan objective. Green Belt is being proposed ahead of countryside adjacent to villages. Evidence on which allocations are made is therefore inaccurate and the Local Plan is unsound and inconsistent with national policy. There is no consideration of alternatives to Green Belt release.

### Response:

No further land is required in this location due to existing commitments, and as part of the spatial strategy, in order to achieve a balanced and equitable spread of growth to the places it is required, this site would not negate the need for Green Belt land to be allocated. It is considered that the land is greenfield as there is a restoration condition attached to the minerals permission.
2.1 The Planning and Compulsory Purchase Act 2004 2.2 The statutory framework for the preparation of Local Plans is set out in Section 19(1B) - (1E) of the Planning and Compulsory Purchase Act 2004 ("the 2004 Act"). Sections 19(1B) - (1E) requires each local planning authority to identify the strategic priorities for the development and use of land in the authority's area and to set these policies out in a development plan document. 2.3 In preparing a local development document, the local planning authority must have regard to national policies and advice; any other local development document prepared for the area; the resources likely to be available for implementing the proposals in the area and such other matters as the Secretary of State prescribes (Section 19(2) of the 2004 Act). 2.4 For the purposes of preparing a local plan, the national policies and advice are contained in the National Planning Policy Framework (February 2019) and the Planning Practice Guidance notes. 2.5 Such other matters as the SoS prescribes include The Town and Country Planning (Local Planning) (England) Regulations 2012. 2.6 Section 19(5) of the 2004 Act requires the local planning authority to carry out an appraisal of the sustainability of the proposals in each development plan document and to prepare a report of the findings of the appraisal. A Sustainability Appraisal has been prepared by Wood Environment & Infrastructure Solutions UK Limited on behalf of Doncaster Council and is considered in further detail below. Local Plan Representation - Regulation 19 2.7 The Town and Country Planning (Local Planning) (England) Regulations 2012 ("the Regulations") 2.8 In addition to the matters which a local planning authority should have regard to when preparing its development plan, as prescribed in Section 19(2)(a)-(2)(i) of the 2004 Act, the Regulations set out additional matters. These are contained in regulation 10 and include: 2.8.1 policies developed by a local transport authority in accordance with section 108 of the Transport Act 2000(1); 2.8.2 the objectives of preventing major accidents and limiting the consequences of such accidents by pursuing those objectives through the controls described in Article 12 of Council Directive 96/82/EC; 2.8.3 the need? (a) (i) in the long term, to maintain appropriate distances between establishments and residential areas, buildings and areas of public use, major transport routes as far as possible, recreational areas and areas of particular natural sensitivity or interest, and (b) (ii) in the case of existing establishments, for additional technical measures in accordance with Article 5 of Council Directive 96/82/EC on the control of major accident hazards involving dangerous substances so as not to increase the risks to people; 2.9 The National Planning Policy Framework ("the Framework") 2.10 The Framework is a material consideration in the determination of planning applications and "must be taken into in account in preparing the development plan". The Framework constitutes the 'national policies' referred to in Section 19(2)(a) of the 2004 Act, which the local planning authority "must have regard to". 2.11 Chapter 3 of the Framework ("Plan-making") provides the tests for the preparation and examination of soundness of development plans. There are 4 tests of soundness which a draft local plan will be examined against. These tests are set out in full below: (a) Positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; (b) Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; (c) Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and (d) Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in this Framework. 2.12 The Doncaster Local Plan Publication draft has been assessed by both Walker Morris LLP and DLP against these tests of soundness. The objections to the Local Plan, by Walker Morris LLP and DLP, highlight the Plan's failure to comply with the various tests of soundness in the Framework.  

Summary: Introductory text on legal requirements for the Local Plan. The plan fails to comply with various tests of soundness.  

Response: Objections noted
6.1 The representations prepared by Jon Goodall and Clare Plant of DLP Planning Ltd are fully endorsed by our clients and summarised below.

6.2 National Policy and the Council’s Proposed Employment-led Housing Requirement
6.3 The Council’s objectives to provide more housing than the Standard Method indicates is supported. However, the economic growth anticipated has been arbitrarily constrained by the use of a shorter assessment period than the overall Plan Period. The Framework requires strategic policies to look ahead over a 15 year period. The approach in the Local Plan fails to consider reasonable alternatives, including calculating employment-led housing requirement in line with a 15 year outlook. Whilst it is agreed the employment-led housing requirement approach is supported as an exception to the Standard Method, this should not be artificially constrained by using a shorter period for assessment. 6.4 ‘Deliverable’ housing sites 6.5 Paragraphs 2.9 to 2.11 of Mr Goodall’s representation highlight the absence of ‘clear evidence’ required by the Framework to demonstrate housing sites are deliverable within 5 years. The representation notes that the local planning authority’s evidence (HELAA 2018) was prepared prior to the publication of the revised National Planning Policy Framework in July 2018. The July 2018 Framework contained the revisions to the definition of ‘Deliverable’ in the Glossary, which placed the onus on the Council to produce ‘clear evidence’ that a site (i.e. an allocation, outline planning permission or permission in principle site) would be delivered within 5 years. 6.6 Paragraph 74 of the Framework requires the local planning authority to establish a five year supply of deliverable housing sites in its local plan. 6.7 The evidence base includes the Doncaster 5-Year Deliverable Housing Land Supply Statement. However, the requirement figure in the Statement is based on the Standard Method and does not seek to demonstrate whether the identified sites are deliverable against the Local Plan requirement. 6.8 The evidence presented in the Housing Land Supply Statement does not include responses from developers, site owners or agents. 6.9 The absence of clear evidence to demonstrate a deliverable housing supply against the prospective housing requirement is a substantial failing of soundness. This fails to consider reasonable alternatives to prospective allocations which may be undeliverable and is inconsistent with the Framework and Planning Practice Guidance. 6.10 Overall quantum of housing required 6.11 Paragraphs 3.3 to 3.4 of Mr Goodall’s representation puts forward an alternative housing requirement figure based on the demand for labour supply over the full plan period to 2035. The housing requirement figure proposed by Mr Goodall is 1,073 dwellings per annum. 6.12 Should Mr Goodall’s requirement figure and approach to calculation be considered sound, the Sustainability Appraisal, spatial strategy and the scale of housing allocations would require reassessment. We support the justification provided in Mr Goodall’s representation. 6.13 The overall quantum of housing allocations and the Council’s spatial strategy are considered unsound as they do not aim to meet the area’s objectively assessed need. 6.14 Distribution of Growth 6.15 At paragraphs 3.10 to 3.26 of Clare Plant’s representation sets out the objection to the distribution of growth in the authority area. The recommendation here is to re-apply the housing provision to those settlements which are sustainable, desirable and close to economic growth. The approach in the Local Plan Publication draft is overly reliant on sites within the Main Urban Area of Doncaster. The unique nature of the Auckley/Hayfield settlement, with its proximity to the airport, should not be limited by an inflexible distribution to the Service Towns/Villages, in particular those which are not limited by Green Belt and are close to large employment centres. 6.16 Policy 7 of the Local Plan Publication draft does not support any contribution to housing growth at the Service Towns and Villages in close proximity to large employment centres. 6.17 Paragraphs 3.51 to 3.52 of Clare Plant’s representation also deal in detail with anticipated jobs growth at Doncaster Sheffield Airport. The Council have underestimated the jobs growth at the airport. The DSA Masterplan expects growth to 4,295 full time equivalent jobs by 2026, while the Council’s jobs growth forecast is 2,545 to the end of the Plan Period in 2035. Clearly the DSA expects significantly more growth than the Council. 6.18 The distribution of growth in the Local Plan Publication draft is inflexible and could fetter sustainable development in the borough. The distribution approach is therefore unsound and inconsistent with the policies in the Framework. 6.19 Housing allocations 6.20 Paragraphs 3.27 to 3.35 of Clare Plant’s representation support the allocation of the Site for housing and object to the retained ‘Countryside’ designation. These views are endorsed here and above. 6.21 For the reasons set out in Clare Plant’s representation at paragraph 3.27 to 3.35, and above, the site assessment in the Sustainability Appraisal is unsound. The Sustainability Appraisal fails to properly assess the site as brownfield land. Consequently the evidence on which the Local Plan allocations are based is inaccurate and the Local Plan is unsound and inconsistent with national policy.

Summary:
Providing more housing than the standard methodology is supported. Economic growth has been arbitrarily constrained by the use of a shorter plan period that the Local Plan’s 15 years. Employment led housing exception to the standard method is supported, but should not be constrained by a shorter period. 2018 HELAA prepared prior to the newly revised NPPF where “deliverable” was re-defined to put the onus on the Council to show clear evidence that a site would be delivered within 5 years and provide a 5 year supply - but this has been done against the standard method, not the housing requirement, which is a failing of soundness. Evidence of deliverability does not include feedback from developers, site owners or agents. There is a failure consider reasonable alternatives to prospective allocations which may be undeliverable and is inconsistent with the Framework and Planning Practice Guidance. New housing figure of 1,073 is suggested - this would require reassessment of the SA, strategy and scale of housing allocations. Allocations do not meet the scale of housing need required and the allocations and spatial strategy are therefore unsound as they do not meet local OAN. Suggest that growth should be re-apportioned to sustainable locations which are desirable and close to economic growth. Too much reliance on the urban area. Auckley - Hayfield Green, with it’s location close to the airport.
should not be limited by an inflexible approach to spatial distribution and is not limited by Green Belt and is close to large employment centres. Policy 7 does not support any contribution to housing growth in the service towns and villages. The Council have underestimated jobs growth at the airport, which is forecast to be 2545 by 3025, when the masterplan shows that 4295 jobs will be delivered by 2026. Object to the site being a countryside allocation. The SA is unsound and fails to assess the site as brownfield. Allocations therefore based on inaccurate info and the plan is unsound and inconsistent with national policy.

Response:
The Peter Brett’s report calculates the housing uplift using the Standard Methodology as a starting point, and this reflects national guidance. 1,073 units would have been the figure under the previous NPPF, where as 912dpa reflects the new NPPF. Over the 20 year plan period, Doncaster will deliver 18,400 homes and the Council is confident it can demonstrate that the allocated sites are deliverable as per the definitions set out in national policy. The Council consulted on the spatial strategy, and the proposed one was the preferred option. Local needs will be met locally in smaller settlements, with larger and more sustainable areas taking on a greater share of the housing requirement. Airport jobs have not been underestimated. 2545 is the figure of jobs owed in lieu of an up front allocation of 280 houses, as per Policy 7. Overall, the policy supports housing related to over 10,000 jobs at the airport, subject to proven delivery. This housing is linked to a specific site adjacent to the airport. Policy 7 is separate to Policies 2 and 3 and the wider spatial strategy, in recognition of the importance of the airport as a local economic asset. In total, approx 1,500 new homes could be delivered in Auckley - Hayfield Green in the plan period, there is no need to allocate more land in this location.
Chapter 16: Spatial Proposals

Reason:

Area: Chapter 16: Spatial Proposals

Policy: Service Town/Village - Barnburgh-Harlington

Tests of Soundness:

- Positively prepared
- Justified
- Effective
- Consistent with national

Comment:

I refer to your Page 294 showing proposed site for change of use from Green Belt to possible building land, my additional comments are in red type. (This cannot be shown - the additional comments are therefore shown as CAPITAL) Plot 777 Archaeology The lack of substantial sub-surface development indicates that the potential for the survival of unrecorded buried remains is high. (AWAIT TO SEE THE REPORT FROM THIS) Further archaeological investigations are likely to be required to inform development proposals. (AGAIN WOULD LIKE TO SEE THE REPORT FROM THIS) Biodiversity From a wildlife point of view habitat compensation should be provided along the southern boundary of the site. To enhance the wildlife corridor that runs further to the south along the River Dearne. Design New development should front toward Doncaster Road echoing building lines opposite. New houses should back onto existing houses along the eastern and western edges with rear gardens locked together. THIS WOULD VASTLY DEPRECIATE CURRENT HOUSE PRICES, IS THERE A COMPENSATION SCHEME FOR RESIDENTS? WE ALREADY HAVE THE PROPOSAL OF THE HS2 DEVELOPMENT, THAT AGAIN BRINGS NO VALUE TO THE VILLAGE. THE APPEAL OF THE VILLAGE IS STRATEGICALLY PLACED PROPERTIES WITH GREEN SURROUNDING COUNTRYSIDE. SATURATING THIS VILLAGE WITH HOUSES WILL DRASTICALLY DEMORALISE THE SMALL COMMUNITY SPIRIT AND SAFETY FACTOR OF OUR ENVIRONMENT BY OVER POPULATION. THE ACCESS TO THIS PROPOSED SITE IS A CONCERN WITH ONCOMING ESTATES ALREADY FILTERING ON THE MAIN ROAD Houses should front southward. The Southern edge of the site requires appropriate stand-off distance from the overhead electricity transmission cables and a soft landscaped edge adjacent the countryside. Education A contribution towards education would be required. THIS WOULD INCUR FURTHER COSTS AND UNNECESSARY GROWTH TO A SMALL VILLAGE. Public Open Space On site open space provision suitable for children’s play will be required, including play equipment. (?! THE VILLAGE CURRENTLY HAS ADEQUATE CHILDREN'S PLAYING AREAS, THIS AREA IS WELL KNOWN FOR THE IDYLLIC QUIETNESS OF TYPICAL RURAL VILLAGE LIFE AND NATURE.) Transport The site can be directly accessed from Church Lane. (NOT SURE RE THIS COMMENT, CHURCH LANE HAS A SINGLE VEHICLE ACCESS POINT!!) Access should be designed for Streets. Any private accesses to classified routes require turning facilities within the site curtilage. A footway is required along the site frontage. There is currently limited bus service provision in this location. (THE BUS SERVICE IS ADEQUATE FOR THE CURRENT RESIDENTS, THIS WOULD BRING MORE TRAFFIC TO THIS VILLAGE AND THE ADDITION WOULD BE A DANGER TO THE CURRENT BUSY ROAD, WHICH IS AT PRESENT A THOROUGHFARE TO THE CALL CENTRES ON THE MANVERS ESTATES.) A Transport Statement will be required, and development may require a routing agreement during construction. Trees & Hedgerows The site is bordered by hedgerows deriving from the 1822 Barnburgh cum Harlington Enclosure Award with the 'light' N-S internal hedge of similar vintage; composition, structural and cultural surveys required. (WOULD LIKE SIGHT OF THIS PLEASE) THE FOLLOWING ARE SOME EXTRACTS AND CONCERNS WITH REGARDS TO YOUR DOCUMENT SUMMARY AND KEY PROPOSALS IN THE LOCAL PLAN, Diversify and support the rural economy whilst protecting and enhancing the character, quality and appearance of the countryside and the natural environment, including areas of landscape and biodiversity value. 16. protect and enhance biodiversity and geodiversity and provide opportunities for people to access and appreciate wildlife and nature. Climate change (flood risk) and energy: 17. reduce dependency on fossil fuels to reduce locally produced C) it will not cause significant adverse harm to a settlement’s character, setting and appearance (including partial or total coalescence with another settlement) or to the intrinsic character of the surrounding countryside; D) it accords with other policies in 6) Green Belt The openness and permanence of Doncaster’s Green Belt (as indicated on the Key Diagram) and defined on the Policies Map will be preserved. *The general extent of the Green Belt will be retained*. Within the Green Belt, national planning policy will be applied including the presumption against inappropriate development except in very special circumstances. Infill development in villages in the Green Belt (i.e. covered by Green Belt policy) is defined as the filling of a small gap in an otherwise built up frontage - a small gap is defined as a gap which fronts onto a highway and has a width of less than 20 metres between existing buildings. THIS SITE IS ACROSS TWO FIELDS (SO IS NOT A SMALL GAP TO FILL BETWEEN PROPERTIES!), CURRENTLY HOMES FOR HORSES, WHICH IN TURN PROVIDES PHYSICAL ACTIVITIES FOR THE RESIDENTS AND A FEELING OF OPEN SPACE AND THE COUNTRYSIDE LIVING THAT THE RESIDENTS OF HARLINGTON BOUGHT INTO WHEN INVESTING IN THIS VILLAGE. THE VIEW IS EXTREMELY APPEALING, AS OPPOSED TO THE ERECTION OF BUILDINGS WHICH WILL HAVE A SUBSTANTIAL ILL EFFECT BLOCKING MANY RESIDENTS OPEN VIEWS, WHICH ARE PRICELESS AND MAKES THE VILLAGE AND VILLAGE. * throughout this policy, the term ‘appropriate locations’ means a location which does not conflict, when taken as a whole, with national policy or policies in this Local Plan. In addition, to qualify as a ‘appropriate location’, the site, if developed, would: o retain the core shape and form of the settlement; o not significantly harm the settlement's character and appearance; and o not significantly harm the character and appearance of the surrounding countryside or the rural setting of the settlement. ** ‘exceptional circumstances’ in this policy is a matter for the decision maker to determine, but could be, for example, where there is a clear demonstrable need for a development, not foreseen by the Plan, that brings significant sustainable development benefits and is consistent with national planning policy in the NPPF. The provision of affordable homes is an example of development likely to meet this definition. For clarity, areas at risk of flooding (flood zone 2 or 3) are not considered as appropriate locations for the purposes of this part of the policy. *** the term ‘demonstration of clear local community support’ means that at the point of submitting a planning application to the Council, there should be clear evidence of local community support for the scheme, including, where appropriate, that of the applicable Parish or Town Council, generated via a Development Limits, Defined Villages and Countryside 4.9. The inclusion of land within a Development Limit does not automatically indicate that it is suitable for development. There may be areas of open space, woodland, areas at risk of flooding, areas that contribute to a settlement’s local distinctiveness and other protected sites that would be inappropriate for development. Additionally, other
Summary:

Objects to proposed Housing Allocation Ref: 777, Plot 3, Harlington. Would like to see archaeological report in respect to the site. House prices would be devalued; is there any compensation for residents? HS2 is already proposed near the village which brings no value with it. The appeal of the village is the surrounding countryside and saturating with houses will demoralise this small community. Access concerns - Church Lane has a single vehicle access point. There is already enough children's play space in the village. Would result in more traffic and highways will be dangerous as already a route for workers at Manvers. Would like to see the Transport Statement. The site is not a small infill gap but 2 fields which are homes for horses which provide physical activities for the residents and a feeling of open space and countryside living that residents have bought into when purchasing their houses. Loss of views. Site is at risk of flooding and contributes to the local distinctiveness and should be protected as Green Belt and is inappropriate for development. No support from local residents for the site. Lack of infrastructure in the village (schools, buses, drainage). No benefits to the village from building more houses. Allocating the site contradicts many of the local plan policies in respect to Green Belt and Countryside and will set a precedent for more loss of Green Belt.

Response:

South Yorkshire Archaeology Service have assessed the site for any potential archaeological impacts and recommended that further exploration would be required at application stage to inform development. The Highways team are satisfied that suitable access can be take from Church Lane. The site itself is not in an area of flood risk, although it is close to a functional floodplain to the south. The Local Plan developer requirements cover what is needed to help make this site deliverable. The Green Belt Review and Green Belt Topic Paper explain why exceptional circumstances exist which justify the release of this site.
Comment:
The site which extends to 0.605 Ha is located to the north east of Hickleton House. The settlement boundary of the village has expanded over recent years to include residential development on Hickleton Road and Barnburgh Lane. The site is currently designated as green belt not withstanding the development on three sides. The proposed removal of the site from the green belt for future residential development will not contradict the following five objectives of greenbelt designation:

- To check the unrestricted sprawl of large built up areas. The site is surrounded by a large body of open countryside which will not be adversely impacted by the proposed re-allocation.
- To prevent neighbouring towns from merging. There is a substantial distance from the site to other significant settlements.
- To safeguard the countryside from encroachment. The site is enclosed by development on three sides.
- To preserve the setting and special character of historic town. The site does not impact on the setting of other settlements.
- To encourage the recycling of derelict and other urban land. There is a limited number of suitable brownfield sites available in the village envelope.

A site in Harlington, which is currently located in the green belt at the edge of the settlement has been identified as being suitable for residential development. This site is both larger and less exposed than the land adjacent to Hickleton House. It is therefore suggested that this site be considered as an alternative or an additional allocation to provide resilience should demand in the area increase. (SEE EMAIL FOR PLANS)

Summary:
Suggested that the land adjacent Hickleton House is proposed as suitable residential development in the Local Plan. The site has development on three sides of the site and although greenbelt, would meet the five objectives of greenbelt designation. Compared to the proposed site at Harlington, this site is larger and less exposed and considered to be an alternative or additional allocation to provide resilience should demand increase.

Response:
The site has been assessed in the Green Belt Review and has been found to be more impactful on the Green Belt than site 777. The Green Belt Review and the Site Selection Methodology both explain why site 777 is the preferred option in this location, and also the exceptional circumstances which justify the release of site 777 (and why there are no exceptional circumstances which justify the release of site 1003).
Following receipt of [Planning Policy Officer] email dated 14 August 2019 confirming that the above detailed site has received support for a housing allocation in the Draft Local Plan, we have been instructed by the owners of the land to submit additional evidence to demonstrate the deliverability of the site for residential development and other considerations. Please find enclosed the following documents: - Site Ownership Plan - Site Constraints & Opportunities Plan - Proposed Access Arrangement - Historic Maps - Environment Agency Flood Map - Annotated Photographs - Barnburgh-Harlington Service Town / Village Plan (draft) (SEE SUPPORTING DOCUMENTS FOR Documents) Ownership / Land Use The site extends to approximately 2.35 hectares under title SYK381116, and is currently used as agricultural and pasture land. The owners of the land could be made available for development immediately upon formal allocation (subject to the appropriate planning approvals).

Contamination Any potential contamination issues resulting from the current use of the land would be dealt with through adequate remediation works prior to any development commencing. A desktop assessment of the historic maps of the area indicates that the site has been in agricultural use since at least the mid-19th Century. The surrounding area has also predominantly been in agricultural use during the same period, with a railway line constructed to the East of the site during the early 20th Century (now dismantled and redeveloped for residential and agricultural nursery use) and residential dwellings constructed to the North and West during the mid-20th Century. Given the historic / current use of the site and its immediate surroundings, it is highly unlikely that any ground contamination would be present. This would be confirmed through a full Phase 1 Ground Investigation submitted with any future planning application(s). Highways / Access A number of potential access points from the adopted highway are available along the Northern boundary of the site. The primary access point is expected to be towards the centre of the site, maximising the available visibility splays at the new junction - given the speed limit on Doncaster Road (30mph), 2.4x43m visibility splays are easily achievable - meeting the required distances set out in the South Yorkshire Residential Design Guide and national standards. It is also proposed that a 2.0m wide public footway to adoptable standards would be constructed along the adopted highway land adjacent to Doncaster Road (replacing the existing grass verge) as part of any future development, along with appropriate tactile crossing points. No public rights of way or bridleways cross the site.

Utilities The site benefits from all major utilities being located within the adopted highway that runs along the Northern boundary, including mains water supply, mains sewerage, electricity supply, gas supply and broadband. Overhead electricity power lines cross the site adjacent to the Southern boundary, with a metal lattice support tower located in the South-West corner of the site. It is envisaged that a surface water pumping station will be required to deal with surface water discharge from the Southern end of the site, connecting with the existing Yorkshire Water pumping station located on the Western site boundary (connecting into the drainage network in Mill Lane). Topography The site generally slopes down from North to South (away from Doncaster Road). Strategies will need to be developed during any future site layout design stages to deal with the existing topography, although it is not envisaged that retaining walls or major structural works would be required.

Landscape There are limited landscape features located within the site itself, other than fences and hedges that separate the agricultural fields; and no trees are located on the site (although a number of trees are located on land adjacent to the site). All of the boundaries of the site are defined by timber fences with mature hedges and trees. Flood Risk The land being put forward for residential use is almost entirely within Flood Zone 1 (with reference to the Environment Agency Flood Maps). A very small area portion of the land in the South-West corner of the site is within Flood Zone 2, although due to the location of the main overhead power lines this area would not be included within the developable area of the site. The area immediately to the South of the site is classified as a flood storage area for the River Dearne.

Covenants The landowners have checked with their solicitor and, as far as they are aware, there are no legal covenants or easements associated with the land that would prevent development. Accessibility The site is highly accessible, with excellent transport connection into Barnsley and Doncaster; and to the motorway network via the A1 (approximately 6 miles away). The 219 / 219A bus routes run along Doncaster Road feeding Barnsley and Doncaster every 30minutes - bus stops are located within 100m of the site. Within the village of Harlington is a shop and a public house, with a wide variety of additional facilities such as schools, medical centres, sports facilities, church, shops, cafes, public houses, a post office and a dentist within the settlement of Mexborough - around 7 miles away.

Summary:

Site 777 - land south of Doncaster Road Harlington (Allocated Housing site) - Supports allocation. - Representation includes additional evidence in support of the deliverability of the site.

Response:

Support welcome
### Comment Ref:
C/Site 147/04517/1/001

### Attend Examination:
Written Representation

### Reason:

### Area:
Chapter 16: Spatial Proposals

### Policy:
Service Town/Village - Barnby Dun

### Tests of Soundness:
- Positively prepared
- Effective
- Justified

### Comment:

Although DMBC had advertised its Local Plan by means identified in the publication document, individual sites were not. The photograph below show the only physical sign posted adjacent to site 147. The sign was strapped to a lamp post on a side of road with no footpath, in a bush (see photograph below). With considerably more visible locations to situate the sign this clearly identifies a shortfall and illustrates DMBC’s policy of discretion in advertising sites. This is totally unacceptable considering the changes proposed and much of Barnby Dun was unaware of the proposition of Site 147 until action was taken by community members. (SEE EMAIL FOR Photograph)

### Summary:
Publicity of the local plan was insufficient. There was only a single site notice posted adjacent to the proposed allocation which was poorly located which is unacceptable and most of the village were unaware until the local community took direct action.

### Response:
The Council went to great strides to publicise the informal consultation when this site was initially proposed, including press articles, signs and meeting the Parish Council in 2018 to discuss plans. The volume of responses show that the public were sufficiently made aware of this site.
Due to the long, narrow plot of Site 147, a large number of properties that border the site boundary are affected. Site 108 (dismissed) impacted only 7 new build homes rather than circa 60 early/mid 1900's homes overlooking uninterrupted views over site 147. The views and privacy are part of these properties and market advice confirms that losing these views and becoming overlooked will negatively impact property desirability and therefore reduce values. Means of suitably compensating affected residents needs to be considered should the development proceed. Greater steps should be documented to guarantee privacy for these affected property occupiers. In continuation to the above paragraph, by following the format of housing types with the area bungalows would maintain a level of privacy. Adequate tall hedging between the existing property and Site 147 boundaries should also be provided as a minimum and documented within the Local Plan. Consideration also needs to be given to the existing hedgerows and the impact on the existing wildlife in the surrounding areas with residents observing Bat, Deer and other animals regularly utilising Site 147 and the surrounding areas.

Neighbouring properties that are adjacent to site ref 147 are affected. Site ref 108 (rejected allocation) only impacted on 7 existing houses rather than the 60 affected by site ref 147. Loss of views will devalue property prices and compensation for residents should be provided. Bungalows would have least impact on existing properties and should be landscaping such as hedgerows. Loss of wildlife also needs to be considered.

Matters of views or house values are not planning matters. The Site Selection Methodology explains why Site 147 is the preferred option in Barnby Dun. Design considerations and other matters can be resolved through the application process, however the developer requirements do list the things needed to make this site deliverable - including from a design, trees, and ecological point of view.
Comment Ref: C/Site 147:Types of houses/04517/1/005
Attend Examination: Written Representation
Reason:
Area: Chapter 16: Spatial Proposals
Policy: Service Town/Village - Barnby Dun

Tests of Soundness:

Comment:
The positioning of Site 147 is amongst bungalow style houses. Consideration should be given to the type of homes to be erected within the Local Plan to ensure the developments are in-keeping with the area they are built. In the case of Site 147 this should be bungalow/dormer bungalow style houses. 3 storey 'town houses' should definitely not be permitted in this area of Barnby Dun. Consideration also to ensure there are no breaches of the Right of Light Act 1959 on the existing properties in the area due to the building of the new proposed homes. Bungalows are the most suitable styles of homes to satisfy this requirement.

Summary:
Site 147 is surrounded by bungalows so consideration should be given to the types of homes to be built to ensure in-keeping. 3 storey town houses should not be allowed and need to ensure no breaches of the Right of Light Act 1959.

Response:
Comments noted. The developer requirements note design requirements, however the design can be looked at it greater detail at application stage.
We act for a number of major land owners in the Doncaster area, we have detailed knowledge of the sites and the planning history of the Borough. We have previously been involved with the Core Strategy Plan and with the Examination of the draft Sites and Policies DPD. Our knowledge of the various land parcels, ownerships, the strategic land position and site specific details, means that we have information to inform the debate regarding the overall housing requirement and the specific allocation of sites which will assist the examination.

Area: Chapter 16: Spatial Proposals
Policy: Service Town/Village - Barnby Dun

Tests of Soundness:
- Positively prepared
- Effective
- Legally Compliant
  - Justified
  - Consistent with national

Comment:
We object to the Policies Map for Barnby Dun The site area shown on the interactive proposals map as housing allocation 147 is not the same as site 147 in previous documents and has been reduced at the eastern end, by at least 50 metres. There is no justification for the reduction in the site area. The map should be amended to exhibit the boundary as previously shown in draft documents. The gross site area should be noted as 11.65 hectares and not 10.11 hectares as listed in table H2(L). The Policies Map shows the extent of Flood Zone 3a, which extends within the red line of site allocation, this line of the purported flood zone does not correlate with our survey work based on site levels and should be amended as shown on the accompanying masterplan, which reflects the surveyed on site position. The site is shown as outside the development boundary of Barnby Dun. The development Boundary should be amended to include this extension land within the defined development boundary of the settlement as it will form an integral part of Barnaby Dunn PROPOSED CHANGE 9. Amend the polices map to reflect the settlement boundary.

As explained in detail above.

Summary:
Objects to Policies Map - the site area shown for housing allocation ref 147 - Hatfield Lane, Barnby Dun is not the same as previous representations/consultation of this site and the eastern edge has been reduced by at least 50 metres with no justification for this reduction. The map should be amended to reflect previous boundary and a gross site area of 11.65ha and not the 10.11ha as listed in table H2L. The EA Flood Map for Planning (as shown on the Policies Map) extends into the housing allocation but doe snot correlate with the technical survey work based on site levels and should be amended as per the accompanying masterplan. The allocation should be included within the development limits of Barnby Dun.

Response:
The allocation has been reduced in size to reflect that there are large areas in flood zone 3 where the site selection methodology has set out built development will not be supported in line with the sequential approach to avoidance of flood risk. The EA Flood Map for Planning has been the basis for applying the sequential test consistently across all site options. Development limits have been identified in line with the methodology which has been subject to previous consultation and was clear that greenfield allocations will sit outside of the settlement where identified on the edge of a town/village but will be incorporated through future review of the plan when permission has been implemented and full details are known in respect to layout etc.
We act for a number of major land owners in the Doncaster area, we have detailed knowledge of the sites and the planning history of the Borough. We have previously been involved with the Core Strategy Plan and with the Examination of the draft Sites and Policies DPD. Our knowledge of the various land parcels, ownerships, the strategic land position and site specific details, means that we have information to inform the debate regarding the overall housing requirement and the specific allocation of sites which will assist the examination.

In the context of the Settlement Audit and other settlement work, Barnby Dun has a target of 105 new homes. This figure is objected to on the basis that this is a highly sustainable settlement where a higher growth figure can be accommodated on the proposed site allocation. This would reflect the sustainability of the settlement and its position close to the main urban area and transport facilities. The concept of target figures based on population and baseline growth only is flawed and the Plan should reflect allocations in the most sustainable service towns and villages that includes economic housing growth and should not be based solely on the existing population figures.

This housing target is in line with the settlements size and position in the settlement hierarchy, which has been derived from the Settlement Audit and other settlement work. Baseline growth is for all settlements, but larger settlements get a share of the economic growth. This is based on sustainability, as set out in the Settlement Audit and Housing Topic Paper.
Support is made in principle for the allocation of site 147 Land to the North of Hatfield Lane Barnby Dun, but objection is made to the reduced site area. It is clear that there are very few extant permissions in Barnby Dun, and the urban extension at site 147 has the full support of the landowners, to deliver the site to the market. However they object to the overall housing number allocated to the site in table H2L, which indicates that the number of dwellings that can be accommodated on the site is 98 units. Technical work undertaken on the site which includes a detailed topographical survey and flood risk assessment based on levels and information demonstrates that the site is capable of accommodating a minimum of 165 dwellings, within the area defined as the extent of the site on the proposals map. This can take place on land that is not at risk from flooding and also retains open space and amenity areas. The developable area could be further maximised following further flood risk analysis. (SEE EMAIL FOR Masterplan layout) The village which is acknowledged as the largest in the Doncaster area lies only just outside the main urban area of Doncaster, and has good links to the area and to Kirk Sandal railway station. On this basis this sustainable location should maximise the use of this site and increase the allocation on the site. Although the number of homes are purported to be indicative in table H2L the indicative figure is currently too low for a site of this size and sustainability. PROPOSED CHANGE 1. To include the proposed allocations 147 within the development limit of Barnby Dun. 2. Allocate sufficient land for the complete plan period and to meet the full housing requirement. 3. Provide consistency between the housing requirement calculations, the supply and the allocated sites. 4. Redistribute the full housing requirement to include the service towns and villages. 5. Provide a table and plan in the text clearly indicating allocations. As explained in detail above.

Response:
Support welcomed. The site density has been calculated using the HELAA methodology and also takes account of the fact some of the site is undevelopable due to flood risk. Barnby Dun only requires 105 new dwellings overall. Policy 6 does allow for higher or lower densities if it would result in a better design solution.
Introduction

Further to the invitation to make comment on the Publication Draft of the Local Plan for Doncaster, DCH Consulting Ltd, on behalf of our client Mr Alec Parkin-Coates would like to put forward the following comments on the whether the plan is legally compliant and sound and specifically in relation to Barnby Dun and the related draft policies and proposed allocations. Mr Parkin-Coates put forward his site at the Call for Sites Stage in relation to a potential housing development, in 2002 as a potential mixed-use site and has continued to promote the site. The site is located to the north of White House Farm, Bramwith Road, Barnby Dun. OS Grid Reference S12099 and is local plan reference 108. Positively Prepared. It is the view of our client that, by Doncaster Council discounting all sites in flood zone 3 and Green Belt sites, they have not prepared the plan positively. The environment agency is continuously re-modelling the flood risk areas and indeed there are areas of Barnby Dun that have been recently re-modelled, reducing the risk from flood zone 3 to 1. This is as a result of the EA understanding more about flood risk in the area and analysis that has been undertaken by technical consultants in respect of specific development sites. There are many Flood Zone 3 sites and Green Belt sites that have been blanked out which have a realistic potential of delivering the development needed for the borough more sustainably than some of the larger sites put forward for allocation. Justified. Mr Parkin-Coates has promoted his site through the local plan process. The most recent representation is attached. The Council have set out there objectively assessed housing need for Barnby Dun and in order to deliver the dwellings required seek to allocate alternative site ref 147, despite much local opposition. Our client is of the view that the Council have not considered his site as a reasonable alternative to deliver the housing need for Barnby Dun. Our client’s site is a brownfield site and is of the same flood risk as site 147. Site 147 has not been previously developed and also poses some potentially significant design issues such as access arrangements, impact on the local highway network and visual impact across the countryside. Site Comparison. Both sites are affected by a high risk of flooding. Both sites are just outside of settlement locations. Our client’s site is brownfield. It is therefore our clients view that the Council have not fully justified the strategy based on his site being a reasonable alternative. Effective. It is questionable whether the plan is deliverable. The plan, in relation to delivering homes, focuses on large scale sites, which are often in multiple ownership (including many of the Council’s own land) and are reliant on major infrastructure improvements. Many of the sites put forward for allocation are to be delivered in the longer term. The NPPF in paragraph 68 states that - Small and medium sized sites can deliver much needed housing development much quicker with less risky investment. Our client’s site could be classed as a small to medium sized site as around 34% is outside of Flood Zone 3, 10% would be open space as per the open space requirement in addition to the required landscaping and sustainable drainage areas required and potential water compatible uses. It is therefore put forward that the plan is not effective to deliver the key objectives to maintain a supply of deliverable housing land and the required new homes (18,400) over the plan period. Consistency with National Policy (NPPF) The National Planning Policy Framework (As Amended) February 2019 sets out the Governments Planning Policy for England. The presumption in favour of sustainable development sets out that for plan-making, plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change. It is clear from recent re-assessment of the flood risks by the EA that the situation in respect of flooding changes rapidly and the initial studies undertaken by our client’s consultant is a positive start to development being safe from flooding. It is considered that our client’s site has not been considered as a reasonable alternative to the site put forward for allocation in that it is a brownfield site and the NPPF places weight on the re-use of brownfield sites. The site put forward is a greenfield site, is currently countryside and flood risk 3 the same as our client’s site. Weighing in favour of our client’s site is that the site is previously developed, deliverable, initial flood risk work indicates that the site can be developed, and the implications of flood risk can be mitigated against with further technical design. In addition, the development of our client’s site will have less impact on the local highway network as the site put forward is in an area of known highway network issues and there will be less visual impact on views across the open countryside, our clients site will be seen in context with the new development on the edge of the settlement. It is on this basis that, in relation to the site specifically, the plan allocation proposed is not consistent with national planning policy when weighed against our client’s site and the selection methodology. PROPOSED CHANGE. Consider our clients site (108) as a reasonable alternative to the site put forward (147) on the basis that it weighs in favour due to the re-development of a brownfield site, less significant highway and visual impact implications. (SEE EMAIL FOR Rep about site AND Flood Risk Appraisal)

Summary:

Re site 108 (Rejected Housing site) Barnby Dun. Site being promoted for allocation. Comparison with allocated site 147. 1. Is a Brownfield site (unlike 147) 2. Is same flood risk. 3. 147 has potential issues (Access/Impact on Highways/Impact on Countryside) 4. NPPF puts weight on BF sites. 5. Initial flood risk work indicates site can be developed with mitigation of risk. 6. Less impact on highways than 147. 7. Less impact on Countryside than 147. 8. Allocation of 108 would bring compliance with NPPF (para's 9 & 32) 9. Representation provides in depth supporting information covering natural Environment, Urban form, Highways, Infrastructure and Flood Risk as to why site 108 should be allocated.

Response:

Do not agree that the site is brownfield. The portion of site 147 allocated for housing is in Flood Zone 1. The Site Selection Methodology explains how decisions have been made about allocations in this settlement, and it is felt that Site 147 constitutes the best site option in Barnby Dun.
The Representation consists of a petition with 370 signatures objecting to the housing allocation at Barnby Dun (Site Ref: 147 - Hatfield Lane). The text states that villages across Doncaster are set to sprawl under housing proposals in the local plan. Whilst there may be a need for housing, there is a consensus throughout Doncaster and Barnby Dun that the quantity proposed far exceeds the borough's infrastructure capacity. Alternative sites should be sought that cause minimal impact to existing residents, infrastructure and amenities. The Local Plan has been relatively well advertised by DMBC. However, there have been shortfalls informing potentially affected residents of such drastic changes such as hidden signage adjacent to proposed sites. The Local Plan that shapes Doncaster's future development is found online. This petition supplements the completed Local Plan Comments Form attached. By signing this petition you object fully to the development of Site 147 and agree to the points raised on the Comments Form. Although this petition relates to site 147, other local residents are welcome to sign. It would be beneficial for other affected areas to adopt an approach like this to show clear dissatisfaction with DMBC and the Local Plan.

Summary:

The Representation consists of a petition with 370 signatures objecting to the housing allocation at Barnby Dun (Site Ref: 147 - Hatfield Lane). The text states that villages across Doncaster are set to sprawl under housing proposals in the local plan. Whilst there may be a need for housing, there is a consensus throughout Doncaster and Barnby Dun that the quantity proposed far exceeds the borough's infrastructure capacity. Alternative sites should be allocated which impact less on existing residents, infrastructure and amenities. Consultation has been relatively well advertised, but there have been shortfalls such as hidden signs adjacent to the proposed site.

Response:

Objections are noted. The site has been identified in line with the spatial strategy and settlement hierarchy as Barnby Dun, being a Service Village, has a local housing need allocation of 105 dwellings over the plan period and there are very few existing sites with permission to meet this target. The site has been identified through the site selection process and its overall size/allocation has been reduced to reflect concerns around the potential for more than the 105 dwellings identified on the site. The Local Plan is supported by an Infrastructure Delivery Plan and policies in the plan provide for contributions towards improving the capacity of infrastructure, such as schools. The Representation does not identify which alternative sites should be allocated instead, nor where such sites may exist that do not impact on existing residents or infrastructure. One of the core principles of national policy is to bring forward sustainable development in locations where people want to live and have access to services and facilities.
### Tests of Soundness:

<table>
<thead>
<tr>
<th>Reason</th>
<th>Area</th>
<th>Policy</th>
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<tbody>
<tr>
<td>To provide a full explanation of our points and address issues raised by the Council, Inspector or other participants.</td>
<td>Chapter 16: Spatial Proposals</td>
<td>Service Town/Village - Bawtry</td>
</tr>
<tr>
<td>5.1 The following table reviews those sites allocated in Bawtry. We reserve the right to comment further on the suitability or otherwise of sites proposed, however our initial research indicates that 18 - 20 units can be discounted from Bawtry’s supply. This provides further justification for the allocation of the site Land West of Bawtry Hall. Table 5.1: Review of Bawtry Sites</td>
<td>Ref: 950 Address: Station Hotel, 93 Station Road, Bawtry</td>
<td>Pegasus Initial Comments:</td>
</tr>
<tr>
<td>Original planning permission on the site, application ref. 14/01733/FULM, was granted in 2016.</td>
<td></td>
<td>- Condition 1 requires the permission to be commenced by 20th October 2019.</td>
</tr>
<tr>
<td>No evidence available to suggest that conditions have been discharged and the development will commence in time.</td>
<td>Ref: 966 Address: Bawtry Hall, South Parade, Bawtry</td>
<td>Pegasus Initial Comments:</td>
</tr>
<tr>
<td>Planning permission ref. 16/00733/FUL expired on 7th June 2019. As confirmed by the consultation document, the development has not commenced.</td>
<td></td>
<td>- No further applications have been submitted to the Council and the intention to development the site is in doubt.</td>
</tr>
<tr>
<td>Ref: 982 Address: Land and Buildings on the West Side of Top Street, Bawtry</td>
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<td>Pegasus Initial Comments:</td>
</tr>
<tr>
<td>Retirement housing.</td>
<td></td>
<td>- Exceptional circumstances considered to exist to justify removal from Green Belt - Council allocate the site for 20 dwellings, however the site layout submitted as part of planning application 16/01672/OUTM(withdrawn) illustrates a capacity of 14.</td>
</tr>
<tr>
<td>Ref: 141 Address: Westwood Road, Bawtry</td>
<td>Ref: 141 Address: Westwood Road, Bawtry</td>
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<tr>
<td>Green Belt site.</td>
<td></td>
<td>- Council allocate the site for 20 dwellings, however the site layout submitted as part of planning application 16/01672/OUTM(withdrawn) illustrates a capacity of 14.</td>
</tr>
<tr>
<td>Ref: 499 Address: Land off North Avenue, Bawtry</td>
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<td>Pegasus Initial Comments:</td>
</tr>
<tr>
<td>Allocated for 16 units in the 0-5 year period. Given the size, shape and orientation of the site, Pegasus believe the site could realistically deliver 10 - 12 units.</td>
<td></td>
<td>- This is a proposed allocation only and no evidence is provided to show that the site will come forward in the 5 year period expected by the Council.</td>
</tr>
<tr>
<td>- It is recommended to remove 4 -6 units from the allocation.</td>
<td></td>
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</tbody>
</table>

### Summary:

Pegasus have reviewed the sites allocated in Bawtry and research shows 18 to 20 units can be discounted from Bawtry's supply (site numbers 950 (no evidence development will commence), 966 (remove allocation), 982 (retirement housing), 141 (remove 6 units) and 499 (remove 4 to 6 units))

### Response:

Disagree with assessment that site numbers can be deducted. Yields are based on planning applications or the HELAA methodology as agreed by the stakeholder group. Confident that numbers proposed can be achieved and there is no need or justification to release further land in Bawtry.
Tests of Soundness:

Comment:
2.23 Our Client supports the proposed allocation of their land interests on Westwood Lane, Bawtry (site reference: 141), as this is a suitable and deliverable housing site that plays little Green Belt function. 2.24 However, our Client objects to the dismissal of their site (reference: 146) as a proposed housing allocation. More detailed information is provided in Section 3 of these representations.

Summary:
Policy 6 - Housing Allocations. 1. Supports allocation of site ref 141. 2. Objects to rejection of site ref 146.

Response:
Support for site 141 welcomed. Site 146 is a large Green Belt extension which scores as having a moderately weak case for removal from the Green Belt. It is not deemed that exceptional circumstances exist which justify the release of this site.
3.1 In addition to publishing the Publication Draft document the Council have also published their proposed housing allocations for consultation. As a major housebuilder within the borough, our Client has a keen interest in the proposed allocations. 3.2 It is noted that our Clients land interest at Tickhill Road, Bawtry (site reference: 146) has been rejected as a proposed housing allocation on the following grounds - "rejected housing site - this site is currently designated as Green Belt. The Phase 3 Green Belt Review concludes that the site has a Moderately Weak Case for inclusion in further site selection work". 3.3 It is important to note that the brief explanation does not dismiss this site on the basis of it having any physical constraints such as access or flood risk issues, it is dismissed on purely on the perceived harm to the Green Belt. 3.4 As per our previous comments and having reviewed the Green Belt Review that has been undertaken in 2016 by Arup on behalf of the Council, our Client has significant concerns regarding the way in which the assessment has been undertaken. Indeed, our Client commissioned a landscape rebuttal, prepared by Golby + Luck Landscape Architects, in response to the findings of the DMBC Green Belt Review. This rebuttal is attached at appendix 1. (SEE EMAIL FOR Appendix 1) 3.5 In addition to this rebuttal, at the previous consultation stage we raised fact that there appear to be flaws in the methodology and this in turn has lead to a negative assessment of our Client’s land, which had the assessment be undertaken in a different way, would not have occurred. 3.6 The Green Belt Review splits the Green Belt within the borough into 64 parcels, which are then assessed against the five purposes of the Green Belt. Whilst it is not disputed that an assessment against the five Green Belt purposes should be undertaken, it is the fact that only 64 parcels of Green Belt have been assessed, and in the case of site ref: 146, dismissed because it falls within a much wider parcel. 3.7 This is not a fair and reasonable way to undertake a Green Belt review and each site put forward should be assessed on its individual merits, not as part of a wider parcel of land, which may well score more poorly. The map extract below shows the extent of 'South 6', which is the parcel of land which site 146 falls within. The parcel is expansive with large areas of woodlands and plantations, however, that is very different context when considered our Clients site in isolation. To put this in this context, Our Clients site area totals 15 ha whilst the Green Belt review has assessed an area that totals over 1,500 ha. Our Clients land equates to just 1% of this of land immediately adjacent to the settlement boundary of Bawtry and 4.55 km from New Rossington to the North West. The site is highlighted in yellow in figure 3.1 below. (SEE EMAIL FOR Figure 3.1 - Extent of South 6 Green Belt Parcel) 3.8 An example of how this approach is flawed, is that under each question, an assessment is made, with reference to the various different areas within the parcel i.e. adjacent to New Rossington, the central area, and adjacent to Bawtry, but then an overall score is given, despite the fact that each of the areas mentioned above play greatly differing roles within the Green Belt. 3.9 It is clear from figure 3.1 above that our Clients site will not impact upon New Rossington or the central area and, when considering the prevention of merging or coalescence of neighbouring towns, the Green Belt Review specifically states that the Green Belt at this location (South 6) represents a 'Less Essential Gap' of a sufficient scale that development is unlikely to cause merging. Futhermore, under the question 'Green Belt General Area has a role in supporting the views into and out of the historic core' and an overall score of 3 is given, which means the following - 'views to the historic core of the settlement from the Green Belt or our from the historic core the settlement towards the Green Belt are dispersed and enclosed with moderate views to key historic elements within the core or out towards a surround. There are some medium scale detractors or nearby built form which have moderate impact on views to and from the Green Belt'. 3.10 However, the specific assessment relating to land around Bawtry states "views towards the historic core of Bawtry are relatively limited by a copse of woodland just beyond the western development extent of Bawtry. Views from the north west towards Bawtry are again limited by the outdoor storage area. Views from the historic core of Bawtry are limited by the modern built form on the settlement’s periphery". This does not align with scoring the site 3 on this test, and it demonstrates that the site has been scored unfairly due to it being included within a larger parcel. 3.11 Our Client objects to the methodology used within the Green Belt Review and we point out that ultimately, if the site was considered in isolation it would have been demonstrated that the land does not play an important Green Belt role and would represent a rounding-off of the settlement. The site is not constrained, a fact which does not appear to be disputed by the Council, and subject to the provision of a strong landscap belt along the western and northern boundaries of the site, would represent a suitable site for a housing allocation. Green Belt release in this location would allow additional housing in Bawtry at an acceptable scale and in an appropriate location. 3.12 An indicative masterplan has been prepared by JRP Architects and it shows how a scheme can be brought forward for 240 units, which only utilises approximately 50% of the overall site, thus reducing the potential impact of the development. This is considered to be a suitable and deliverable housing site, which is being promoted by a housebuilder with a track record for delivery, and this site could be delivered within the first five years of the plan, which could deliver a significant level of much needed affordable housing within this area. We would advise that the Council under take a specific Green Belt Assessment of this site in isolation. 3.13 With regards to our Clients other site in Bawtry, which is located off Westwood Road (site ref: 141), they fully support the proposed housing allocation. The site is not constrained and has defensible boundaries on three sides, and it plays a limited role in the Green Belt and therefore should be removed and allocated for housing.

Summary:
Site 146 (rejected) 1. Rejected because it is Greenbelt. 2. Contends that GB review and methodology was flawed. 3. Site is part of a much wider assessed parcel - do not agree with this. \ should have been assessed on its own merits. 4. Includes full rebuttal to Greenbelt assessment by Golby & Luck Site 141 (allocated) o Supports allocation.
Response:
The Green Belt Review is an independent document with an agreed methodology which has been consistently applied across the borough. Site 146 has been assessed on its own merits in the Stage 3 report, as well as part of a larger parcel in Stage 1, which considers all of the borough’s Green Belt. Site 146 scored as moderately weak in the Stage 3 review, having a mixed boundary and being strong on Green Belt purposes. The Stage 3 report is published and the Green Belt Topic Paper also examines the Green Belt options in Bawtry. Support for site 141 noted.

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<td>Barratt and David Wilson Homes</td>
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<table>
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<tr>
<td>Attend Examination:</td>
<td>Attend Hearing</td>
</tr>
</tbody>
</table>

| Reason: | |
| Area: | Chapter 16: Spatial Proposals |
| Policy: | Service Town/Village - Bawtry |

| Tests of Soundness: | |

| Comment: |
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| Summary: |
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The Phase 3 Green Belt Review concludes that the site has a Moderately Weak Case for inclusion in further site selection work". 3.3 It is important to note that the brief explanation does not dismiss this site on the basis of it having any physical constraints such as access or flood risk issues, it is dismissed on purely on the perceived harm to the Green Belt. 3.4 As per our previous comments and having reviewed the Green Belt Review that has been undertaken in 2016 by Arup on behalf of the Council, our Client has significant concerns regarding the way in which the assessment has been undertaken. Indeed, our Client commissioned a landscape rebuttal, prepared by Golby + Luck Landscape Architects, in response to the findings of the DMBC Green Belt Review. This rebuttal is attached at appendix 1. 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Furthermore, under the question 'Green Belt General Area has a role in supporting the views into and out of the historic core' and an overall score of 3 is given, which means the following - views to the historic core of the settlement from the Green Belt or our from the historic core the settlement towards the Green Belt are dispersed and enclosed with moderate views to key historic elements within the core or out towards a surround. There are some medium scale detractors or nearby built form which have moderate impact on views to and from the Green Belt. 3.10 However, the specific assessment relating to land around Bawtry states "views towards the historic core of Bawtry are relatively limited by a copse of woodland just beyond the western development extent of Bawtry. Views from the north west towards Bawtry are again limited by the outdoor storage area. Views from the historic core of Bawtry are limited by the modern built form on the settlement’s periphery”. 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Green Belt release in this location would allow additional housing in Bawtry at an acceptable scale and in an appropriate location. 3.12 An indicative masterplan has been prepared by JRP Architects and it shows how a scheme can be brought forward for 240 units, which only utilises approximately 50% of the overall site, thus reducing the potential impact of the development. This is considered to be a suitable and deliverable housing site, which is being promoted by a housebuilder with a track record for delivery, and this site could be delivered within the first five years of the plan, which could deliver a significant level of much needed affordable housing within this area. We would advise that the Council under take a specific Green Belt Assessment of this site in isolation. 3.13 With regards to our Clients other site in Bawtry, which is located off Westwood Road (site ref: 141), they fully support the proposed housing allocation. The site is not constrained and has defensible boundaries on three sides, and it plays a limited role in the Green Belt and therefore should be removed and allocated for housing.

Summary:

Site 146 (rejected) 1. Rejected because it is Greenbelt. 2. Contends that GB review and methodology was flawed. 3. Site is part of a much wider assessed parcel - do not agree with this. \(\text{\$} should have been assessed on its own merits. 4. Includes full rebuttal to Greenbelt assessment by Golby &Luck Site 141 (allocated) o Supports allocation.
Response:
The Green Belt Review is an independent document with an agreed methodology which has been consistently applied across the borough. Site 146 has been assessed on its own merits in the Stage 3 report, as well as part of a larger parcel in Stage 1, which considers all of the boroughs Green Belt. Site 146 scored as moderately weak in the Stage 3 review, having a mixed boundary and being strong on Green Belt purposes. The Stage 3 report is published and the Green Belt Topic Paper also examines the Green Belt options in Bawtry. Support for site 141 noted.

CUSREF: 05172  Name: Pegasus Group
Date: 30/09/2019  Organisation: Pegasus Group
Representing: Wilson And McKay Families

Comment Ref: C/Martin Lane Introduction/05172/1/002
Attend Examination: Attend Hearing
Reason: To provide a full explanation of our points and address issues raised by the Council, Inspector or other participants.
Area: Chapter 16: Spatial Proposals
Policy: Service Town/Village - Bawtry

Tests of Soundness:

Comment:
1.1 This representation is prepared by Pegasus Group on behalf of Mr. J. Wilson in relation to Land at Martin Lane, Bawtry. The representation considers the content within the Publication Draft of the Doncaster Local Plan. 1.2 In compiling this representation Pegasus Group have applied the four elements of soundness referred to in the National Planning Policy Framework, which are; positively prepared, justified, effective and consistent with national policy. 1.3 This representation should be read in conjunction with the accompanying representation produced by Pegasus Group to the draft policies and proposed site informal consultation in September 2018. The Publication Draft version identifies few substantive changes to the earlier iteration and as such our previous representations remain. The appended document promotes the site and illustrates why it should be allocated for residential development. The purpose of this submission is to focus on the matters within the Publication Draft, mainly the overall requirement and distribution of housing and update our previous representations. (SEE EMAIL FOR Appendix documents) The Site - Land at Martin Lane, Bawtry The site being promoted on behalf of Mr. J. Wilson is approximately 5.4ha of Land at Martin Lane which sits on the northern edge of the settlement of Bawtry. The site is promoted for approximately 100 dwellings. This site forms part of a larger parcel of land of approximately 55ha which has been previously promoted. This larger parcel remains available (outlined red on figure 1.1). However, at this stage our client seeks the allocation of the smaller parcel (outlined red on figure 1.1). 1.4 These changes have been made to address previous concerns regarding the scale of the site and its impact upon the Green Belt, this is discussed in greater detail within section 7 below. The site as now promoted will focus residential development within the red-line boundary. This is closely related to the current built form of Bawtry and is bounded on all sides by a clear defensible boundary. The amendments ensure that the site as now proposed will have minimal impacts upon the Green Belt. 1.5 The landowner is actively promoting the site as a suitable location for new homes. The area identified for residential development could accommodate circa 100 dwellings. The accompanying Site Concept Plan illustrates how development could be achieved on the site in a well-designed manner, responding to site conditions and local characteristics, including heritage setting considerations. (SEE EMAIL FOR Figure 1.1: Location Plan - Land at Martin Lane, Bawtry) 1.6 The site can deliver a range of type and tenure housing suitable for different groups in the community. The provision of new homes in this settlement will not only make an important contribution to meeting the housing requirement for the Borough, as a minimum, but will also have local and Borough-wide economic benefits in terms of construction impact and household expenditure once constructed. 1.7 We consider that land at Martin Lane is a suitable site at Bawtry for housing growth to contribute to the Borough’s growth and boost housing land supply. 1.8 We confirm that land at Martin Lane is available now, that the promotion of the site is supported by willing landowners, and that development on the site could be delivered in a timely manner to contribute to the Borough’s supply.

Summary:
Representation by Pegasus Group on behalf of Mr. J. Wilson in relation to Land at Martin Lane Bawtry. The site being promoted on behalf of Mr. J. Wilson is approximately 5.4ha of Land at Martin Lane which sits on the northern edge of the settlement of Bawtry. The site is promoted for approximately 100 dwellings. This site forms part of a larger parcel of land of approximately 55ha which has been previously promoted. This larger parcel remains available. However, at this stage our client seeks the allocation of the smaller parcel. These changes have been made to address previous concerns regarding the scale of the site and its impact upon the Green Belt.

Response:
Newly promoted site acknowledged. We will not be assessing further new sites at this stage of the process.
6.1 The following table reviews those sites allocated in Bawtry. We reserve the right to comment further on the suitability or otherwise of sites proposed, however our initial research indicates that 18 - 20 units can be discounted from Bawtry's supply. This provides further justification for the allocation of the site Land West of Bawtry Hall. Table 5.1: Review of Bawtry Sites Ref: 950 Address: Station Hotel, 93 Station Road, Bawtry Pegasus Initial Comments: - Original planning permission on the site, application ref. 14/01733/FULM, was granted in 2016. Condition 1 requires the permission to be commenced by 20th October 2019. - No evidence available to suggest that conditions have been discharged and the development will commence in time. Ref: 966 Address: Bawtry Hall, South Parade, Bawtry Pegasus Initial Comments: - Planning permission ref. 16/00733/FUL expired on 7th June 2019. As confirmed by the consultation document, the development has not commenced. - No further applications have been submitted to the Council and the intention to development the site is in doubt. - It is recommended to remove the allocation. Ref: 982 Address: Land and Buildings on the West Side of Top Street, Bawtry Pegasus Initial Comments: - Retirement housing. Accommodation is restricted to persons over 60 years of age. Ref: 141 Address: Westwood Road, Bawtry Pegasus Initial Comments: - Green Belt site. Exceptional circumstances considered to exist to justify removal from Green Belt - Council allocate the site for 20 dwellings, however the site layout submitted as part of planning application 16/01672/OUTM (withdrawn) illustrates a capacity of 14. - It is recommended to remove 6 dwellings from the allocation. Ref: 499 Address: Land off North Avenue, Bawtry Pegasus Initial Comments: - Allocated for 16 units in the 0-5 year period. Given the size, shape and orientation of the site, Pegasus believe the site could realistically deliver 10 - 12 units. - This is a proposed allocation only and no evidence is provided to show that the site will come forward in the 5 year period expected by the Council. - It is recommended to remove 4 -6 units from the allocation.

Summary:
Following a review of sites in Bawtry, it is felt 18 - 20 units can be discounted from supply, further justifying the site to the west of Bawtry Hall: Ref: 950 Address: Station Hotel, 93 Station Road, Bawtry Pegasus Initial Comments: - Original planning permission on the site, application ref. 14/01733/FULM, was granted in 2016. Condition 1 requires the permission to be commenced by 20th October 2019. - No evidence available to suggest that conditions have been discharged and the development will commence in time. Ref: 966 Address: Bawtry Hall, South Parade, Bawtry Pegasus Initial Comments: - Planning permission ref. 16/00733/FUL expired on 7th June 2019. As confirmed by the consultation document, the development has not commenced. - No further applications have been submitted to the Council and the intention to development the site is in doubt. - It is recommended to remove the allocation. Ref: 982 Address: Land and Buildings on the West Side of Top Street, Bawtry Pegasus Initial Comments: - Retirement housing. Accommodation is restricted to persons over 60 years of age. Ref: 141 Address: Westwood Road, Bawtry Pegasus Initial Comments: - Green Belt site. Exceptional circumstances considered to exist to justify removal from Green Belt - Council allocate the site for 20 dwellings, however the site layout submitted as part of planning application 16/01672/OUTM (withdrawn) illustrates a capacity of 14. - It is recommended to remove 6 dwellings from the allocation. Ref: 499 Address: Land off North Avenue, Bawtry Pegasus Initial Comments: - Allocated for 16 units in the 0-5 year period. Given the size, shape and orientation of the site, Pegasus believe the site could realistically deliver 10 - 12 units. - This is a proposed allocation only and no evidence is provided to show that the site will come forward in the 5 year period expected by the Council. - It is recommended to remove 4 -6 units from the allocation.

Response:
Disagree with assessment that site numbers can be deducted. Yields are based on planning applications or the HELA method as agreed by the stakeholder group. Confident that numbers proposed can be achieved and there is no need or justification to release further land in Bawtry.
Comment: The Town Council would not support the allocation of site 141 Westwood Road as sound. Although excluding the site would reduce the allocated units required by 20, a small development does little to achieve housing targets and as a Green Belt site, by its nature, does significant damage. We do not therefore consider that exceptional circumstances can be shown at this site to justify inclusion. Other sites proposed and considered may have been more suitable that were not Green Belt. We are also concerned about whether the plan has been "Positively Prepared - providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities" or "Effective - deliverable over the plan period, and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground" In particular it has been established the above refers to section 106 monies between neighbouring counties. We have had recent examples of this not happening when developments are proposed in Harworth.

SUMMARY: 'Unsound' - Objects to the allocation of housing site 141 Westwood Road due to loss of Green Belt and there are no exceptional circumstances demonstrated to justify the decision. At just 20 dwellings the site contributes little towards the settlement's requirement. Other site options have been rejected that may have been more suitable and not Green Belt. Also raises concerns about cross boundary working with neighbouring authority (Bassetlaw District Council) in respect to development across the borough boundary at Harworth and its impact on the local road network and lack of Section 106 monies.

Response: Doncaster Council is working closely with Bassetlaw District Council with regard to the duty to cooperate and the impact that development in Harworth is having on the road network in Doncaster including Bawtry. Exceptional circumstances justifications are set out in the Green Belt Topic Paper, which is based in part on the findings of the Stage 3 Stage 3 review. Site 141 in Green Belt terms is the most strongly justified piece of Green Belt to remove, being an isolated island. There are no preferable Green Belt options in the settlement, and whilst 20 units is relatively modest, it is not insignificant in the scheme of Bawtry's requirement and helps the settlement to deliver 90 out of 110 proposed units.
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**Comment Ref:** C/Site 165,186/0077/6/030

**Attend Examination:** Attend Hearing

**Reason:** To assist the Inspector by using our submitted representations to answer his/her questions, particularly in light of the evidence submitted by other representors and any other matters the Inspector may raise.

**Area:** Chapter 16: Spatial Proposals

**Policy:** Service Town/Village - Carcroft-Skellow

**Tests of Soundness:**

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**Comment:**

Proposed Housing Allocations Site Ref: 165,186 Location: Skellow Objection: Too peripheral to be sustainable. PROPOSED CHANGE Delete the proposed allocations for the reasons shown in our table above.

**Summary:**

Site 165 / 186 - object - too peripheral to be sustainable. Proposed change: delete the proposed allocation.

**Response:**

Disagree, the site results in a rounding off of the built form in this location, is not isolated and no more distant from existing services that the current residences in this area.
Comment: We object to the Policies Map for Carcroft /Skellow. The sites allocated as 186 and 165 should be included with the development boundary as they will form part of the settlement and should therefore be within the residential policy area. The alteration to the Green Belt Boundary to exclude sites 186 and 165 is supported. PROPOSED CHANGE 9. Amend the polices map to reflect the settlement boundary. As explained in detail above.

Summary: Object to the Policies Map for Carcroft /Skellow. The sites allocated (Refs: 186 /165) should be included with the development boundary as they will form part of the settlement and should therefore be within the residential policy area. Supports alteration to the Green Belt Boundary to exclude sites.

Response: Development limits have been identified in line with the methodology which has been subject to previous consultation and was clear that greenfield allocations will sit outside of the settlement where identified on the edge of a town/village but will be incorporated through future review of the plan when permission has been implemented and full details are known in respect to layout etc. Support to remove the site from the Green Belt welcomed.
The Chapter sets out the role and function of the settlements in the hierarchy. Paragraph 16.150 sets out that this level of settlement will receive growth relating to their share of the baseline requirement, with each settlement having a target figure relative to the existing population. Objection is made to the fact that only the baseline growth is apportioned to the service towns and villages and that the economic housing growth should also form part of the growth proposals for these settlements. Carcroft/Skellow has a target of 250 new homes. This figure is objected to on the basis that this is a highly sustainable settlement where a higher growth figure can be accommodated on the proposed site allocation. This would reflect the sustainability of the settlement and its position near to major industrial areas and allocations. The concept of target figures based on population and baseline growth only is flawed and the Plan should reflect allocations in the most sustainable service towns and villages that includes economic housing growth and should not be based solely on the existing population figures.

Response:
This housing target is in line with the settlements size and position in the settlement hierarchy, which has been derived from the Settlement Audit and other settlement work. Baseline growth is for all settlements, but larger settlements get a share of the economic growth. In this case, neighbouring Adwick-Woodlands has economic growth as a Main Town. This is based on sustainability, as set out in the Settlement Audit and Housing Topic Paper.
We act for a number of major land owners in the Doncaster area, we have detailed knowledge of the sites and the planning history of the Borough. We have previously been involved with the Core Strategy Plan and with the Examination of the draft Sites and Policies DPD. Our knowledge of the various land parcels, ownerships, the strategic land position and site specific details, means that we have information to inform the debate regarding the overall housing requirement and the specific allocation of sites which will assist the examination.

Area: Chapter 16: Spatial Proposals
Policy: Service Town/Village - Carcroft-Skellow

Tests of Soundness: Positively prepared  Justified  Consistent with national  Legally Compliant

Support is made in principle for the allocation of sites 186 and 165. Carcroft Skellow is the largest of the service towns and villages and a sustainable location with a good range of services. The sites total some 15.11 hectares and the indicative capacity is 300 new homes. It is not known why the development of the site should be included as delivering in years 6-15 of the Plan period, the site is available and deliverable early in the Plan Period. PROPOSED CHANGE 5. Provide a table and plan in the text clearly indicating allocations. As explained in detail above.

Support welcome. A table of allocations is provided in Chapter 16 of the Plan. The build out rates are explained in the HELAA methodology, but these are an assumption, and it is acknowledged that sites may be developed before or after this point.
PROPOSED CHANGE The area in which the proposed site for building homes is green belt land and I do not think it should be built on. The policy on building on green belt land states and you say that “The general extent of the Green Belt will be retained. Within the Green Belt, national planning policy will be applied including the presumption against inappropriate development except in very special circumstances. Infill development in villages in the Green Belt (i.e. covered by Green Belt policy) is defined as the filling of a small gap in an otherwise built up frontage - a small gap is defined as a gap which fronts onto a highway and has a width of less than 20 metres between existing buildings. * throughout this policy, the term ‘appropriate locations’ means a location which does not conflict, when taken as a whole, with national policy or policies in this Local Plan. In addition, to qualify as an ‘appropriate location’, the site, if developed, would: o retain the core shape and form of the settlement; o not significantly harm the settlement’s character and appearance; and o not significantly harm the character and appearance of the surrounding countryside or the rural setting of the settlement. ** ‘exceptional circumstances’ in this policy is a matter for the decision maker to determine, but could be, for example, where there is a clear demonstrable need for a development, not foreseen by the Plan, that brings significant sustainable development benefits and is consistent with national planning policy in the NPPF. The provision of affordable homes is an example of development likely to meet this definition. For clarity, areas at risk of flooding (flood zone 2 or 3) are not considered as appropriate locations for the purposes of this part of the policy. *** the term ‘demonstration of clear local community support’ means that at the point of submitting a planning application to the Council, there should be clear evidence of local community support for the scheme, including, where appropriate, that of the applicable Parish or Town Council, generated via a thorough but proportionate pre-application consultation exercise.” I not sure what the VERY SPECAIL CIRCUMSTANCES are that you need to build on this specific land. On a personal note I bought the property I own for the views of the countryside and wildlife such as deer, pheasant, many birds and bats. If the development was to go ahead I would look out on to a many, many roof tops. I think this would devalue my property and would be. The development of these houses in this location on a community would change this area to a quiet place to a urban area. The road are not equipped at present undertake the amount of people commuting to work down the A1 which regularly is congested and the slip road is not long enough. The development would only exasperate this and make it worse. The local amenities, it’s already a problem trying to get appointments at the local doctor’s surgery and schools in immediate area are full.

Summary: ‘Unsound’ - Objects to housing allocation 165/186 - Crabgate Lane, Skellow. The site is Green Belt and should not be developed based on the Council’s own Local Plan Policy 3 part 6. If the site was developed then would result in loss of countryside views, loss of wildlife and devaluation of property value. Would also impact on the quietness of the area. The highway network is insufficient already and the A1 is regularly congested and the slip road is not long enough and would all be exasperated by further development. Local amenities are also insufficient and at capacity, such as GP and schools.

Response:
Policy 2 part 6 applies to decision making, however as explained in the Housing Topic Paper and Green Belt Topic Paper, the release of Green Belt is sometimes necessary when justified by exceptional circumstances, as in the case of this site. Developer requirements explain what is required to make this site acceptable, and modelling of both the local road network and the strategic road network has been undertaken by AECOM and Highways England respectively.
Comment:

5.1 Land at Crabgate Lane is identified in Table H2(N) as having an indicative capacity of 300 dwellings when conjoined with allocation 165. This representation is supported by a Site Promotion Document which explains when the land at Crabgate Lane is a suitable location for new homes. It also illustrates how development could be achieved on the site in a well-designed manner, responding to site conditions and local characteristics. We confirm that Site 186 is capable of being delivered on a solus basis for in the region of 135 units; it is not related in deliverability terms to the rest of the Site 165 to the north; and represents the most suitable parcel of land within the Site 165 having the immediate boundary with the northern edge of the settlement. Notwithstanding this position, we recognize that a comprehensive, well-designed development would be necessary across the whole allocated site area, and the opportunities to link Site 186 to land to the north are illustrated in our accompanying Site Promotion document. We reserve the right to comment further on any site-specific requirements that may follow in regard to the wider land area (Site 165). (SEE EMAIL FOR Site Promotion Document)

5.2 The provision of new homes in this settlement will not only make an important contribution to meeting housing requirement for the Borough but will also have local and Borough-wide economic benefits in terms of construction impact and household expenditure once constructed. 5.3 We strongly support the inclusion of land at Crabgate as a housing allocation within the Publication Draft Local Plan. We concur with the Council’s assessment that this site represents the most suitable site at Carcroft & Skellow for housing growth to contribute to the level of growth directed at the settlement by the Plan’s strategic policies. Site 186 is available now, supported by a willing landowner and development on site could be delivered in a timely manner to contribute to the Borough’s supply.

Summary:

Land at Crabgate Lane is identified as being able to deliver 300 dwellings in conjunction with site 165. This is supported. The site is a suitable location which can be well designed. Site 186 is also available as a stand-alone site for 135 units and is the most suitable parcel of the two being the southern one - however it is accepted that a comprehensive well designed development would be necessary and will provide links to Site 186. Houses here will help meet the borough housing requirement, and also have wide economic benefits in terms of construction jobs and household expenditure when constructed. Strongly support the inclusion of this site in the Local Plan allocations, and the site has a willing landowner.

Response:

Noted. The preference is that both sites will be allocated and provide a coherent holistic new housing site in this location.
5.1 Land at Mill Lane, as promoted by this document is approximately 11ha of land immediately east of Mill Lane, to the north of residential development on Acacia Road, on the northern edge of the settlement Carcroft & Skellow. This representation is accompanied by a Site Promotion Document which explains why Site 185 represents a suitable location for new homes in accordance with the strategic draft policy targeting growth to the settlement of Carcroft & Skellow. It also illustrates how development could be achieved on the site in a well-designed manner, responding to site conditions and local characteristics. (SEE EMAIL FOR Site Promotion Document) 5.2 The provision of new homes in this settlement will not only make an important contribution to meeting the housing requirement for the Borough, as a minimum, but will also have local and Borough-wide economic benefits in terms of construction impact and household expenditure once constructed. 5.3 As discussed previously, we disagree with the Council’s reason for rejecting Site 185 - that "part of the site is within Flood Risk Zone 2/3 so allocation of the site would lead to inappropriate development in a high flood risk area - the site fails the flood risk sequential test." The presence of area of Flood Zone only on a proportionately small part of the site does not make the site unsuitable in its entirety. The Site Promotion document accompanying this representation demonstrates how the site is capable of being designed in a way that excludes built development from the Flood Zone. Flood risk mitigation is also possible over the wider site. The residential uses would be within Flood Zone 1, therefore there would be no failure in sequential flood terms. 5.4 We consider that Site 185 is a suitable site at Carcroft & Skellow for housing growth to contribute to the Borough’s growth and boost housing land supply. My clients are also promoting Site 186 in in Carcroft & Skellow (a proposed housing allocation) and it is considered that this site (Site 185) would assist in providing a flexible land supply for Carcroft & Skellow in addition to Site 186. Site 185 is available now, supported by a willing landowner, and development on the site could be delivered in a timely manner to contribute to the Borough’s supply. 5.5 We reserve the right to comment further on proposed sites in Carcroft & Skellow in subsequent consultations on the draft Plan.

Summary:
Promoting site 185 - 11ha to the east of Mill Lane on the northern edge of Carcroft Skellow. New homes in this settlement will make an important contribution to meeting the housing requirement for the borough but will also have borough wide economic benefits in terms of construction impacts and household expenditure when built. Disagree that being in flood zone 2 / 3 should rule this site out. The flood zone is only on a small part of the site and does not make the site unusable in its entirety. It can be designed in a way that excludes flood zone development and mitigates flood risk across the site. All residential land would be in flood zone 1 and would therefore not fail the sequential test. Client also promoting 186 and so 185 will assist in providing flexible land supply in this location. It can be brought forward in a timely manner to assist with housing supply in the borough.

Response:
Almost 22% of the site is in Flood Zones 2 and 3 (19% in the latter). Furthermore, the site was considered in the Green Belt Review and found to have a weak case for inclusion in the Site Selection Process. In both flooding and Green Belt terms, site 165 / 186 is preferable, being less impactful on the Green Belt, able to demonstrate exceptional circumstances, and containing no land at risk of flooding. If site 165 / 186 are allocated, no further land is required in this location.
6.1. Priority Space objects to Policy 6 and the proposed distribution of housing and that the following site is not a proposed allocation: - Site 273: Askern Road, Carcroft 6.2. The site is summarised below and technical information and advocacy reports have been submitted previously an updated flood risk assessment will be submitted shortly. Test of Soundness 6.3. Priority Space considers that the Local Plan is currently unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 6.4. Priority Space is concerned that the Local Plan is not producing sufficient homes across the Borough. Further to comments in relation to Policy 3, Priority Space recommends that further sites are identified to meet and exceed the requirement but also to provide a sufficient buffer to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the Framework requirements for the plan to be positively prepared and flexible. 6.5. Priority Space is concerned that the proposed distribution of new homes does not reflect the spatial strategy, but importantly does not address the focus for economic and housing growth across the Sheffield City Region and Yorkshire and Humber as a whole. 6.6. The proposed distribution against the Council’s own targets shows a deficiency and a significant under provision in: - Doncaster - Adwick - Conisbrough - Denaby - Mexborough - Thorne - Moorends - Spotbrough - Tickhill - Bawtry 6.7. Priority Space, as explained in response to Policy 2 and the spatial strategy considers that the spatial strategy is incorrect, that it does not provide for the growth of the Borough and does not reflect the role, function and location of the settlements. 6.8. Priority Space, as explained in response to Policy 2 and 3, considers that there needs to be further provision of housing and a slightly amended approach to the spatial strategy, which focusses growth towards Doncaster. There should be further growth of Rossington to address regeneration and the provision of new infrastructure. There should be growth in Thorne-Moorends, and a regeneration focus in Carcroft-Skellow which should elevate the status of the settlement commensurate to its role and function. New housing should be provided in Tickhill to address the current under provision. Wadworth should accommodate some new housing to reflect its role and function and provision should also be made in the villages to address the rural economy. 6.9. Carcroft and Skellow is a highly sustainable settlement, but is only identified as a Service Town and Village which is proposed to accommodate 250 dwellings. However, the Settlement Audit 2017 and settlement profile demonstrates that the settlement sits within the top 10 settlements within the Borough based on primary services and facilities. It is the only other settlement to have the same score for primary services and facilities as settlements identified as Main Towns. Further the Settlement Background Paper 2018, notes the close relationship with Adwick Woodland. Stating in support for Adwicks position as a Main Town that it is co-located with Carcroft-Skellow and they share a number of services. However the co-location of settlements is not reflected in the scoring of facilities within the Carcroft-Skellow Settlement profile (within the Settlement Profile Document), nor is it reflected in Carcroft-Skellows’ position within the settlement hierarchy. 6.10. As outlined in the Settlement Audit (2017), Carcroft has a primary school and a high street with a range of shops including an Asda Superstore and a number of local shops and services offering a range of services. The proximity of these services, and a number of businesses, to the site creates employment opportunities to any potential incoming residents into the locality. 6.11. Priority Space therefore consider that the status of the settlement should be elevated and consider that is capable of and should accommodate more development. This would assist the regeneration and renewal of the settlement and assist in the economic and housing growth aspirations of the Borough and Region. 6.12. Priority Space would be concerned if the figures identified for each settlement are maximum’s. In accordance with the Framework, Priority Space considers the requirements for each settlement should be minimums to be achieved. This would provide the flexibility in order to achieve the overall housing requirement for the Borough. 6.13. Carcroft is in a prime strategic location near to significant existing and proposed employment parks and further housing provided to ensure Doncaster benefits from such inward investment. Priority Space proposes that their site at Askern Road can accommodate new housing to meet that need. 6.14. Priority Space is concerned that the single site identified in Carcroft-Skellow (Site 165/186) is located off-centre and will not benefit in relation to regeneration and economic growth to the same extent a site adjacent to the centre of the settlement. 6.15. Furthermore, there does not appear to be any safeguarded sites identified within the Local Plan. This is concerning given Policy 6 states that the Plan will designated Reserve Development Sites, yet those identified are not considered to be developable within the Plan Period. As indicated in response to Policy 3 Priority Space suggest, that safeguarded sites be proposed, to provide additional flexibility in accordance with national guidance. 6.16. Priority Space consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, Priority Space do not consider the Doncaster Local Plan in its current form to be sound. 6.17. However, Priority Space consider that with the proposed allocations and the deletion or adjustment in anticipated delivery within the plan period of sites 165/168 that the Local Plan can be found sound. Priority Space will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 6.18. To overcome the objection and address soundness matters, the Council should: 6.19. Delete or reduce the expected yield of the following allocations: - Site 165/168. 6.20. To address these deficiencies in the Plan Priority Space therefore suggest that the following sites be allocated: - Site 273: Askern Road, Carcroft 6.21. A short summary of the site is in the following sub-section and an updated Flood Risk will be submitted in due course to supplement these representations.
Policy 6 - Housing allocations

1. Not producing enough homes across the Borough.
2. There are under provisions in numerous settlements (listed para. 6.6)
3. Spatial Strategy is incorrect.
4. Status of Carcroft/Skellow should be allocated commensurate with its role and function.
5. Figures in each settlement should be minimums to be achieved to allow for more flexibility.
6. Site 273 Askern Road Carcroft (rejected site) should be allocated (an in depth advocacy of the site is included).
7. Site 165/186 should be deleted or the expected yield reduce.

Response:

Overall the borough is meeting its housing targets, and generally settlements are too, where suitable and justified sites exist. The Main Urban Area and Main Towns use ranges and all but Mexborough, due to numerous constraints, are within or at the top of these. Not all settlements need to deliver at the top of the ranges, if they all did there would be an oversupply of housing in the borough. Most of the Service Towns and Villages meet, surpass, or almost meet their targets, with the exception of Tickhill which falls short due to Green Belt and access issues, and a lack of existing commitments. However, the shortfall in areas is picked up in other areas. Site 273 is in Flood Zone 3 and therefore not appropriate to allocate. 165/186 is not flood risk and has a moderately strong case for removal from the Green Belt, and it is deemed that exceptional circumstances exist that justify this site being removed from the Green Belt and allocated. It is not clear why, therefore, site 273 is preferable.
6.22. Priority Space consider that Carcroft is able to and should accommodate more development, which would assist the regeneration and renewal of the settlement and assist in the economic and housing growth aspirations of the Borough and Region. Carcroft is in a prime strategic location near to significant existing and proposed employment parks and further housing provided to ensure Doncaster benefits from such inward investment. 6.23. Priority Space objects that Site 273 at Askern Road, Carcroft site is not allocated and should be identified as a housing site. 6.24. Priority Space object that the site has been discounted in relation to Flood Risk. The site is well located in terms of proximity to services and facilities. An updated Flood Risk and Drainage Assessment, including a Sequential Assessment has been prepared and will be submitted shortly, which demonstrates a drainage strategy for the site and that the site has not flooded for a significant period of time. The additional modelling demonstrates that in the event of a breach of the flood defences and as the site levels are lifted to accommodate a flood from a breach, the water that would have inundated the site would be displaced over lower lying undeveloped parcels of land to the east, resulting in no flood risk to existing property. Priority Space have been in discussion with the Environment Agency, regarding the principles of development at this site, and have received a positive response indicating that they do no object to the development of the site subject to confirmation that sleeping accommodation is restricted to upper floors. Technical studies are ongoing but initial assessments demonstrate the site's deliverability. An updated flood risk assessment will be submitted in due course to supplement these representations. 6.25. Priority Space considers the proposed site is available, suitable and achievable and is therefore in accordance with the Framework a deliverable site able to come forward in the short term. 6.26. The deliverability and benefits of the Askern Road, Carcroft site is as follows: Overview of Proposals 6.27. The site is located within a mixed use area with employment uses located to the south of the site adjacent to Askern Road. Immediately adjacent to the north and west of the site are residential uses which form the settlement of Carcroft and an allocated undeveloped residential site from the UDP (1998). To the east of the site is open countryside. The site is currently accessed via North Street located to the north and Askern Road to the South. The site is circa 9.9ha and can accommodate in the region of 200 houses. (SEE EMAIL FOR Aerial Photo) Deliverability 6.28. The site at Askern Road, Carcroft provides a development opportunity that is available, suitable and achievable and therefore it is considered that the site is deliverable, in accordance with national planning policy and guidance. It is promoted by Priority Space which further demonstrates the site's deliverability within the plan period. Availability 6.29. The land is being promoted by Priority Space. The site is therefore available in accordance with the Framework and the National Planning Practice Guidance (PPG). 6.30. The proposed development can make an efficient and attractive use of the land. The site represents an excellent opportunity for future housing and development. This site allows housing to be delivered within an appropriate and sustainable location within Carcroft. Suitability 6.31. A site is suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable mixed communities. 6.32. The site is adjacent to a partially underdeveloped UDP housing allocation (PH315 - Owston Road, Carcroft, Site 398 - 93 homes). This site is identified as a Reserved Site in the Local Plan and therefore there is potential for any future housing allocation to include the site as part of a larger housing allocation for sustainable growth in Carcroft and Skellow. Further the development of land off Askern Road may assist with the deliverability of Site 398. 6.33. The land at Carcroft is a highly appropriate site to assist with the housing need in Doncaster. The site is capable of delivering a residential scheme in a sustainable location with significant regeneration, infrastructure, economic, environmental and recreational benefits. 6.34. The site is within the settlement of Carcroft and Skellow which is a highly sustainable area as evidenced by the findings from the Settlement Audit (2017), Settlement Profile (2018) by Doncaster Council as part of the preparation of the Doncaster Local Plan. The site is well connected, within walking distance of bus and train service, local services including a school, community facilities and a wide range of shops. The site is accessible by a variety of modes of transport and is therefore suitable for development. 6.35. With reference to the Environment Agency's flood risk maps, the site is within Flood Zone 3 and as such is at a high risk of flooding with a medium to high risk of flooding from surface water. However, in context the majority of Carcroft is within Flood Zone 3 and as such these areas will need to be fully considered for new housing. Walker Ingram have undertaken an updated Flood Risk and Drainage Assessment. Consultations with the Environment Agency demonstrate that the site has not recently flooded and did not flood in 2007 with defences containing the flood water. Indeed, the site has not flooded in over 70 years. The additional modelling demonstrates that in the event of a breach of the flood defences and as the site levels are lifted to accommodate a flood from a breach, the water that would have inundated the site would be displaced over lower lying undeveloped parcels of land to the east, resulting in no flood risk to existing property. In relation to development of the site the report concludes that solutions are available and the site is capable of being developed for housing. the updated flood risk assessment will be submitted in due course and supplement these representations. Further the Environment Agency have responded positively and indicated that they do not object to the scheme subject to the confirmation that sleeping accommodation is restricted to upper floors. 6.36. The development will provide additional quality development that will benefit Carcroft and the wider district with economic, environmental and social benefits. It is therefore considered that the development is suitable. Green Belt 6.37. Due to the significant need and demand for housing and aspirations for economic and housing growth there is clearly a requirement for a strategic review of the approach to locations for future growth within the district. In order to plan for appropriate for the plan period there is a need to review the Green Belt boundaries. A thorough review of the development limits of Doncaster settlements would ensure a holistic approach to the location of development for the future of the Borough. 6.38. The housing needs of Doncaster are putting severe pressure on the local authority to review the Green Belt. To meet the housing requirement Doncaster Council recognises that some Green
Belt land will need to be released for new housing land. Askern Road, Carcroft is a unique opportunity to positively use the Green Belt and meet the housing need for the area. 6.39. In the Borough of Doncaster approximately 46% of the area is designated as Green Belt. This is the western part of the Borough which forms part of the South Yorkshire Green Belt surrounding urban areas. 6.40. The Framework explains that there are five purposes of including land within the Green Belt, which is: 1. To check the unrestricted sprawl of large built up areas; 2. To prevent neighbouring towns merging into one another; 3. To assist in safeguarding the countryside from encroachment; 4. To preserve the setting and special character of historic towns; and 5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land. 6.41. Contextually, the site is "contained" by development and activity being a "tongue" of land which protrudes into the urban area of Carcroft-Skellow surrounded by residential properties, a housing allocation and the employment land. Within this context the release of the site from the Green Belt has limited impact on "openness" and that redevelopment of the site would have low impact on the purposes of including land within the Green Belt. 6.42. The Framework states that Green Belt boundaries should be drawn so as not to include land which it is unnecessary to keep permanently open. The impact on the openness of the Green Belt will be limited. The site is bounded by the urban area to the north, east and south. To the south is Askern Road with employment uses beyond, to the north is housing and to the west is a housing allocation and Owston Road, which has housing and a primary school and some local businesses. 6.43. The site is therefore "contained" and will not lead to unrestricted sprawl or encroachment. The site is a protrusion of Green Belt into Carcroft-Skellow and is contained within its setting. The site would not therefore lead to the coalescence of towns. Whilst the development would result in development of some countryside the degree of encroachment into the countryside would be minimised. The site has no impact upon the setting of a historic town. 6.44. Priority Space propose that the new Green Belt boundary would "round off" Carcroft-Skellow and follow the defined drainage which is clear and well defined. This boundary would accord with the Framework and ensure that the Green Belt is clearly defined using readily recognisable features to ensure permanence reinforcing the urban context whilst providing a robust boundary for the future. 6.45. All the boundaries have the potential to be further reinforced within the site through additional planting to ensure an effective transition between the development and the countryside beyond. Achievable 6.46. A range of technical work is being undertaken and further survey work is ongoing. From the initial assessments there are no technical issues that would prevent development or are insurmountable. The site is therefore considered to be achievable and therefore deliverable in accordance with national guidance. The technical assessments will be submitted in due course and are available upon request. Effective Use of Land 6.47. Although the site is greenfield, the proposed scheme will utilise and enhance existing infrastructure. Although the site is not previously developed it is currently under-utilised. The site is easily accessible and the proposed main access is off Askern Road. The scheme is therefore making an efficient and effective use of land and infrastructure. Delivering a Flexible Supply of Housing 6.48. The Framework requires Local Planning Authorities to meet their full objectively assessed housing need. Priority Space considers that the site at Askern Road, Carcroft is deliverable in the short term and will reinforce the housing supply and address the Borough's housing needs in the early periods of the Local Plan. The site is fully capable of being delivered in the next 5 years. A Positive Response to the Key Objectives of the Framework 6.49. The Framework sets out that the Governments key housing policy goal of boosting significantly the supply of housing and proactively driving and supporting sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs. The Framework explains that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as extensions to towns, and creating mixed and sustainable communities with good access to services, jobs and infrastructure. Sites should also make efficient use of land and existing infrastructure. 6.50. In relation to the Framework: - The proposal responds positively towards national guidance. - The site is appropriate for accommodating housing growth, being an expansion of an existing settlement. - The proposed site is accessible to existing local community facilities, infrastructure and services, including public transport. - The site has been assessed and is available, suitable and achievable for development. Benefits of Askern Road, Carcroft 6.51. The development of the site would provide significant benefits. The site would provide housing that would meet the needs of the Carcroft and Doncaster Borough housing market. Therefore this site provides a unique opportunity in a sustainable location. 6.52. In accordance with the Framework this representation has shown that: - The site is suitable for housing and can deliver circa 200 new homes. - The proposal will deliver high quality housing. - The proposal will deliver affordable housing. - The proposal can provide a good mix of housing commensurate to the demand and needs in the area. - The scheme uses land efficiently and effectively. - The proposal is in line with planning for housing objectives. - The site is within a sustainable location situated in close proximity to services and facilities and also to bus stops for local bus routes. - The scheme will create direct and indirect job opportunities both during and after construction. 6.53. The proposal is an appropriate site to provide for the housing needs of Carcroft and Doncaster in the short term. The allocation of the site would confirm its potential to help continue the provision of a balanced housing supply in the Borough in sustainable locations. The site can deliver a full range and mix of housing and a sustainable community. Development of the site would deliver housing and affordable housing. Doncaster needs to have a robust housing trajectory and the site at Askern Road, Carcroft would assist with this delivery in the short term. The site is situated within a prime location suitable for residential development and as such would facilitate the development of land in a more effective and efficient manner. Development of the site would not harm or undermine the areas wider policy objectives, but seeks to reinforce the need to develop sites within sustainable locations as a priority. 6.54. The site is available, suitable and achievable and therefore deliverable in accordance with the Framework. Proposed Change 6.55. To overcome the objection and address soundness matters, the Council should: - Allocate: o Site 273: Askern Road, Carcroft (SEE EMAIL FOR Flood Risk Assessment)

Summary:
Carcroft should be able to accommodate more development, which would assist regeneration and help the Borough meet it's housing targets.
Prime strategic location close to employment opportunities. Object to the rejection of the site due to flood risk. Site is well located in relation to services and facilities. An updated flood risk and drainage statement will be provided shortly. The site has not flooded for a significant period of time. Site levels can be lifted and any potential flood water distributed to fields to the east. The EA have responded positively to discussions on the site, including sleeping accommodation upstairs only. Updated flood risk assessment to follow. The site is in a mixed use area and is an unused UDP allocation. It can accommodate approx. 200 houses. It is available, suitable and achievable and therefore deliverable. The site is sustainable and can meet the housing needs of Carcroft, as well as the short term trajectory in the Local Plan. It can provide a mix of housing, including affordable housing and a sustainable community. Site 273 should be allocated.

Response:
No sites are being allocated in the borough in areas of flood risk. A suitable site has been found in Carcroft - Skellow which can deliver the settlements housing requirement and does not flood.
Our industrial estates are too remote from the motorway and much of the land is farmed and crossed by drainage ditches. Our villages require major road infrastructure investment to open it up for any further development. Furthermore, as I understand it, any further development of these sites would only provide the majority of non-employment uses e.g. lorry/transporter parks, motor dismantlers and spares. PROPOSED CHANGE The infrastructure for the proposed developments is not fit for purpose. The DMBC have a duty of care to their residents. The volume of traffic already is having a negative impact on health and safety of residents. In addition, the DMBC are already lacking in their duty to provide the social services that should be expected as a basic human right. The impact of the lack of social services not only impacts on the well-being of residents but also the environment.

Summary:
The B1220 is the main road supporting traffic through the village and the only route to/from the A1 to the Carcroft Enterprise Park and industrial estates. There have been numerous accidents on this road. Owston Park School and Carcroft Middle School are not in a position to accommodate an influx of children. Children already have to travel out of the area to secondary school as Outwood Academy is full. Waiting lists to get appointments at the local GP are long and even calling is difficult. Skellow and Carcroft are identified as the most deprived areas in Doncaster. Statistics provided by Public Health England clearly supports our argument that the impact of the existing negative environmental issues is contributing to the poor health of resident’s within our area. The exception rate for COPD and Asthma sufferers of all ages are some of the worst in Doncaster. COPD may be initiated by other route causes but it is no doubt exacerbated by the present condition of the environment and air quality. Industry/Employment: - Our industrial estates are too remote from the motorway network and much of the land is farmed and crossed by drainage ditches. Our villages require major road infrastructure investment to open it up for any further development. Furthermore, as I understand it, any further development of these sites would only provide the majority of non-employment uses e.g. lorry/transporter parks, motor dismantlers and spares. PROPOSED CHANGE The infrastructure for the proposed developments is not fit for purpose. The DMBC have a duty of care to their residents. The volume of traffic already is having a negative impact on health and safety of residents. In addition, the DMBC are already lacking in their duty to provide the social services that should be expected as a basic human right. The impact of the lack of social services not only impacts on the well-being of residents but also the environment.

Response:
The Council has liaised with relevant infrastructure providers throughout the Local Plan process. The education team have assessed the impact on schools in the borough and the developer requirements note where money will be required as part of future planning applications for housing. Please see the Infrastructure Delivery Plan for more details. Furthermore, the impact of development on both the local and strategic road network has also been assessed by AECOM and Highways England respectively with recommendations made on how to mitigate any forecast impacts in the transport modelling reports / IDP.
The addition of 300 houses (rather than 250 needed - DMC own figures) is a poorly thought out idea which shows a complete lack of knowledge of the local area. This is a disgrace that a local council lacks such understanding. 1) Schools - This year has already seen pupils in this area not being able to get into the local high school due to a lack of places! What School building is planned in the area to allow for 300 extra houses being added? 2) GP Surgery - The 2 local GP Surgeries have had to merge this year due to a lack of doctors & restrictive NHS funding. Has an increase in 300 house equate to more district nurses? What changes are planned in the Doncaster Royal infirmary A & E if we are going to fee the increased house building in this and other parts of Doncaster? waiting times are also bad now before adding more population ! 3) Local infrastructure Since the recent building of the Carcroft industrial estate there has been a huge increase in the number of HGV's using the road. There have been numerous approaches to the Council from local residents to ask for this to be assessed to no avail. Is there a plan by the Council to look at this and how it will be affected with the 300 new houses or has the Council again made the plan without actually looking at All aspects ? 4) Healthy living - With the governments healthy living policies increasing year on year has the local Council even considered the lack of enough green space for current residents before adding 300 more house?
1) It is suggested that the land off Crabgate Lane is a suitable site for 300 houses to be built based on the land’s suitability regarding not being a flood risk, this is incorrect. I have lived on Crabgate Lane for 7 years and we have had flooding on this land twice within those 7 years, one occasion resulted in the water flowing across the road and down our driveways. What guarantee’s can Doncaster Council offer to reassure homeowners on Crabgate Lane that building on this land will not increase the flooding risk to our properties? 2) In the draft local plan published last year, Doncaster Council have admitted that the B1220 (Skellow Road) does not have spare capacity for the further development of Carcroft Industrial Estate and recommends a link road be built to accommodate the extra vehicles. If there’s no infrastructure for the vehicles, how can 300 houses be built putting potentially 600 more vehicles on our local roads, this does not include deliveries to the houses, bin collections, all the building development vehicles. Is the link road going to be built prior to the housing development starting? 3) The target number of new houses to be built is 250 so why is Doncaster Council suggesting putting 300 on the site, our local services are already at full capacity, our GP Surgery has waiting lists of over a month for prebookable appointments, an hour wait for the blood clinic (I have 3 separate examples of this). Outwood Academy has no spaces and students are having to travel across Doncaster to other schools. What provisions are Doncaster Council going to make to accommodate 300 new households to the area? 4) Our area has a lack of green spaces that are suitable as recreation spaces, 300 new families to the area will further impact on what is already an issue that has been highlighted to Doncaster Council. Numerous Pit tops around Doncaster have been developed into woodland parks, Bullcroft has not been developed into a green space even after numerous requests from local residents. Is this lack of amenities for local residents and area to be reviewed by Doncaster Council? 5) Crabgate Lane has an issue with speeding vehicles, including the buses this has been previously highlighted to Doncaster Council, I did receive a reply from Nigel Raven but no action was to be taken, I asked for more road signs and traffic to be monitored, what is Doncaster Council going to propose to make our roads safer with more vehicles using it?

Summary:

Comments on sites 165 & 186 Crabgate Lane Skellow. Flood risk: 1. Land is a flood risk and has flooded twice in the last 7 years. 2. What guarantees can be offered that development will not increase the flood risk on Crabgate lane. Roads: 1. Impact on local road - The B1220 does not have any additional capacity (as acknowledged by DMBC 2018 consultation). How can it accommodate a potentially 600 plus additional vehicles? 2. Crabgate Lane has an issue with speeding vehicles. What will be done to make the roads safer with additional vehicles? Housing figure: 1. Target number of houses is 250. Why is the Council suggesting a capacity of 300? Impact on services: Concerned about increased pressure on local services - GP/Schools. Outwood academy has no spaces. Amenities: Lack of local amenities especially Green space to accommodate 300 new families.

Response:

The site is not in Flood Zone 2 or 3 (where we are not looking to allocate housing). Any flood risk mitigations will be decided through the eventual application for housing on this site, when such details can be covered thoroughly. The impact of development on both the local and strategic road network has also been assessed by AECOM and Highways England respectively with recommendations made on how to mitigate any forecast impacts in the transport modelling reports / IDP. Indicative capacities are based on build out rates agreed with the stakeholder group earlier in the Local Plan process, but will be clarified through the eventual planning application. The Council has liaised with the CG however NHS surgeries are not in the Council’s control. The Council has liaised with relevant infrastructure providers throughout the Local Plan process. The education team have assessed the impact on schools in the borough and the developer requirements note where money will be required as part of future planning applications for housing. Please see the Infrastructure Delivery Plan for more details. The Council has produced numerous Green Space information both before the Local Plan and as part of the process. The Green Space Audit is now seven years old and will be updated following the adoption of the Local Plan.
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  (SEE EMAIL AND SUPPORTING DOCUMENTATIO FOR ADDITIONAL DOCUMENTS)

Summary:
A site promotion document was provided to the Council in April 2019 promoting the site for 80 dwellings. Since then further work has been done in relation to flood risk mitigation and the consequences of additional work for the Local Plan

Response:
The site has been promoted late in the process and therefore will not be considered for allocation at this time.
Comment Ref: C/Policy 6: H2(N)Crabgate/05319/1/012

Attend Examination: Attend Hearing

Reason: The matters raised in our representation go to the heart of the Local Plan. It is considered that attendance at the relevant hearing sessions will allow further comment to be made where appropriate.

Area: Chapter 16: Spatial Proposals

Policy: Service Town/Village - Carcroft-Skellow

Tests of Soundness:

Comment:
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.

Summary:
Sites in Carcroft/Skellow: Crabtree Lane Site (165/186 proposed for allocation) may not deliver the number of dwellings proposed. Suggest that 25 units per year is more feasible than 35.

Response:
The yields and build out rates were agreed with the stakeholder group as set out in the HELAA methodology.
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.

Propose site at Ings Lane for allocation (housing) o More land should be released from Greenbelt at Carcroft/Skellow to meet shortfall. o Suggest Land West of Ings Lane is suitable and deliverable and achievable (rep includes details re site and yield etc.). o All site is in Flood Zone 1 (based on commissioned modelling - may differ from EA data) o Only limitation of the site it that it is Greenbelt. o Suggest that this site is 'weak' in GB protection terms. o Compares Ings Lane site with allocated sites 165 & 186 in terms of Greenbelt and Flood risk, o Ings Lane is appropriate for residential development potentially more than 165 & 186. o Rep includes several reports and a promotion document in support of the Ings Lane site.

Response:
The identified site (165 / 186) can deliver enough houses to meet the requirement for the settlement on a site without flood risk constraint which was assessed in the Green Belt Review as having a moderately strong case for removal from the Green Belt. The Ings Lane site could not deliver enough units to meet the local housing need, so irrespective of Green Belt / Flood issues etc., more land would be required in the area.
Support welcomed

Tests of Soundness:

Comment:
Please see the supporting letter referenced: 08.23.MP.YK5661P.Yorkshire Main Colliery - Local Plan Rep: This Local Plan Representation has been prepared by DLP Planning Ltd on behalf of Harworth Group in response to the publication of the Doncaster Local Plan (Regulation 19) for consultation. This representation relates to the 'Former Yorkshire Main Colliery, Broomhouse Lane, Balby' (site ref: 646). This representation should be read alongside the formal response form that has also been completed and submitted in relation to the site. Site and Context The application site comprises 16.8 hectares of land to the north of Broomhouse Lane, Edlington. The site is forms part of the wider former Yorkshire Main Colliery site and is in the eastern part of the wider site in an area previously used for spoil tipping with associated engine house and railway sidings. Following the closure of the colliery tip washing operations were undertaken at the site to recover coal. Part of the former colliery to the south of Broomhouse Lane has been restored as Edlington Pit Wood Country Park, which is linked to the site via a footbridge. The application site is bounded to the north and east by agricultural land and to the west by Lords Head Lane. The proposals represent the final phase in the redevelopment of the former Yorkshire Main Colliery site, having already been developed for residential and industrial use to the west. In December 2018, hybrid planning permission was granted under reference 18/02100/OUTM, including outline permission for residential development of up to 375 dwellings and public house with associated access, landscaping and public open space and full planning permission was granted for the creation of a temporary access and enabling earthworks to create a development platform. Delivery The subject site is in the full ownership of Harworth Group. Harworth are currently engaging with housebuilders with a view to bringing the site forward for development in 2020/21, following the remediation and earthworks which will enable the land to be sold as a serviced site. Proposed Allocation The site is proposed to be allocated for housing within the Publication Local Plan under site reference: 646 ‘Site at Former Yorkshire Main Colliery, Broomhouse Lane, Balby’. Policy 6 identifies that the site has an indicative capacity for up to 375 dwellings and sets out that Housing Allocations will help to deliver the Spatial Strategy, meet the needs for housing and support sustainable communities. Policy 3 ‘Level and Distribution of Growth’, sets out that the Local Plan’s strategic aim is to facilitate the delivery of 18,400 homes in the period of 2015 - 2035 (920 annum), with sufficient land allocated to deliver 15 years’ supply of housing. To meet the Local Plan’s Spatial Strategy and Settlement Hierarchy, 10% of the Borough’s Total Housing need is earmarked to be delivered within Service Towns and Larger Villages. Edlington is identified within this classification and it is proposed that the settlement will deliver 230 dwellings over the plan period. Although the delivery of this site exceeds the housing target for Edlington, the oversupply of housing will help to deliver the final 2 years of housing supply for the plan and therefore support the wider borough plan period requirement for housing delivery. The allocation of this site for housing meets the objective of paragraph 117 of the NPPF, which sets out that planning policies should promote the effective use of land in meeting the need for homes and that strategic policies should make use of previously developed land as much as possible. Summary The site is proposed to be allocated for residential development under site reference number 646 and benefits from a live planning permission. The delivery of this site will make the best use of previously developed land in a highly sustainable location. The site has the capacity to make a significant contribution to the supply of housing in the Borough and is essential in meeting the spatial strategy for the plan period. The allocation of this site for residential development is therefore supported.

Summary:
Supports the plan as ‘sound’. Site reference 646 - Broomhouse Lane, Edlington is proposed to be allocated for residential development and benefits from a live planning permission. The landowner (Harworth Group) are currently engaging with house builders with a view to bringing the site forward for development in 2020/21 following remediation and earthworks to allow the land to be sold as a serviced site. The delivery of this site will make the best use of previously developed land in a highly sustainable location. The site has the capacity to make a significant contribution to the supply of housing in the Borough and is essential in meeting the spatial strategy for the plan period. The allocation of this site for residential development is therefore supported.

Response:
Support welcomed
C/Site 315 - Summary/0234/2/004

**Reason:** To support the Representations Report and the Inspector's understanding of the site.

**Area:** Chapter 16: Spatial Proposals

**Policy:** Service Town/Village - Finningley

**Tests of Soundness:**

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**Comment:**

DLP Planning Ltd object on behalf of Mr and Mrs Honcharenko to the retention of this site within the Countryside Policy Area. It is recommended that the settlement boundary for Finningley is amended to incorporate the site. The site has been considered suitable, developable, deliverable and available by the Local Planning Authority and is sustainably located. Its inclusion within the settlement boundary for Finningley will not lead to an unsustainable form of built form and represents a logical limit which is tightly drawn in with the existing site boundary.

**Summary:**

Site 315 should be in the development limit for Finningley. It is suitable, deliverable and available (by DMBCs own records (HELAA)), and is also sustainable. The site will not lead to an unsustainable built form and represents a logical limit which is tightly drawn in with the existing boundary.

**Response:**

Such land is excluded from development limits as per the methodology, and as such has been allocated as countryside. There is no need to find additional housing land in Finningley as the local housing requirement can be met.
This Local Plan representation has been prepared by DLP Planning Ltd on behalf of Mr and Mrs Honcharenko in response to the publication Doncaster Local Plan (Regulation 19) for consultation. This representation relates to ‘Land west of Station Road, Blaxton’ (site ref: 315). This representation should be read alongside the formal response form that has also been completed and submitted in relation to this site.

**Site and Context**
The site is located on the edge of the settlement of Finningley to the rear of properties along Station Road (A614). The site comprises of an existing dwelling and with access taken from an existing track on Station Road. The site is bounded by agricultural land to the south and west and a rail line is located to the south of the site. The centre of the village of Finningley is located 500 metres to the south of the site on Doncaster Road. The site is located within Flood Zone 1.

**Proposed allocation**
The draft Local Plan document and Proposals Map shows the site washed over by Countryside Policy Area, this is despite the site being brownfield in nature. (SEE DOCUMENT FOR Fig 1 - Draft Policies Map Extract)

**Summary:**
Site 315 is on the edge of the settlement and comprises of an existing dwelling with access from Station Road. It is bounded by a rail line and agricultural land. It is close to Finningley centre (500m) and the site is located in flood zone 1. It is brownfield. Despite this, it is being washed over as countryside.

**Response:**
The site may have development on it (house), but it is largely greenfield, comprising of a garden and adjacent garden / paddock land. Such land is excluded from development limits as per the methodology, and as such has been allocated as countryside. There is no need to find additional housing land in Finningley as the local housing requirement can be met.
2.26 The Housing Allocations required to deliver the proposed housing requirement and distribution as set out in Policy 3, are identified by Policy 6. Site 189, the Higgin’s Site is not currently proposed for allocation, and is designated within the Countryside Policy Area (figure 2). 2.28 We strongly object to the current designation of the site within the Countryside Policy Area and the omission of the site from allocation within Policy 6. (SEE EMAIL FOR Figure 2: Extract of the site from the draft Doncaster Local Plan Proposals Map (2015-2035)) Recommendation 2.29 Site 189 should be removed from the Countryside Policy Area and added to the list of housing allocations and the Proposals Map should be updated to reflect this. 2.30 The site should be allocated for housing development in order to meet the future shortmedium term housing requirement, as discussed with reference to Policy 3 above. The allocation would also take the opportunity to deliver new sustainable development on land (part of which is brownfield) adjacent to an existing settlement in order to meet the needs of the local population. 2.31 Full justification for this recommendation is set out within Section 3 of this representation, which confirms that the site is suitable, deliverable and developable for housing, and capable of being brought forward and allocated for housing within the Local Plan. 2.32 The site adjoins the Finningley development boundary and contains existing built form associated with the commercial use of the site. The site is not protected for employment use, as more suitable sites are identified elsewhere within the Borough. 2.33 Furthermore, substantial growth is anticipated in association with the neighbouring airport site, resulting in job creation and a need for housing within the locality. It is considered to be both logical and sustainable to therefore focus housing growth within the area surrounding the airport, in order to support Policy 7 of the draft plan and to support the future sustainability of services within Finningley. 2.34 It is acknowledged that land has been identified for housing under Policy 7 in the draft Local Plan to facilitate the growth of the airport. The Airport Masterplan includes an initial allocation of 280 dwellings to help realise its economic aspirations under site ref: 223 ‘Land at Hayfield lane, Auckley’, as well as an additional 920 units, only to be released when jobs are evidenced to support the requirement for additional dwellings under site ref: 940 ‘Land East of Poplars Farm, Hurst Lane, Auckley’. Site ref 940 is isolated from the existing settlements surrounding the airport and would result in a residential scheme that in our view would not sympathetically integrate with the existing area. In addition, it is a significant distance from the centre of Auckley-Hayfield Green or Finningley and the services within it, therefore occupiers would be likely to be reliant on the use of private car. 2.35 The Higgin’s site is more sustainably located when compared to those sites within the DSA Masterplan, but not withstanding this, for the reasons set out within this representation, additional housing land should be allocated in any case to support the additional requirement that we have identified. In order to support the economic growth strategy set out within the Local Plan and the sustainability of existing settlements, it is recommended that site 189 is allocated for housing. 2.37 A number of the Housing allocations put forward within the draft Local Plan are currently within the Green Belt and/or within flood zone 3. 2.38 Allocated sites within the green belt include: - Site Ref: 33 ‘Land adjacent 163 Sheffield Road, Warmworth (112 units). - Site Ref: 40 ‘Land at Sheffield Road/Old Road, Hilltop, Conisbrough’ (200 units). - Site Ref: 115 ‘Alverley Lane’ (150 units). - Site Ref: 141 ‘Westwood Road, Bawtry’ (20 units). - Site Ref: 165 ‘Land North of the A1, Skellow’ and Site Ref: 186 ‘Land off Crabgate Lane, Skellow’ (300 units). - Site Ref: 777 ‘Plot 3, Harlington’ (66 units). - Site Ref: 929 ‘Land North of Cadey Road, Sprotbrough’ (80 units). - Site Ref 1028 ‘Sunderland Street, Tickhill’ (74 units). Allocated sites within flood Zone 3 include: - Site Ref: 81 ‘Alexander Street. Thorne’ (113 units). - Site Ref: 343 ‘Alexander Street, Thorne’ (74 units). - Site Ref: 396 ‘North Eastern Road, Thorne’ (53 units). - Site Ref: 147 ‘Land to the North of Hatfield Lane, Barnby Dun’ (175 units). 2.39 These sites are considered to be less sequentially preferable in policy terms for development when compared to the Higgin’s Site. As outlined in the National Planning Policy Framework (the ‘Framework’), exceptional circumstances are required to justify changes to Green Belt boundaries. The Framework also sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. 2.40 The Higgin’s Site is not situated within the Green Belt and is located within Flood Zone 1. Given that the site is suitable, available and achievable for housing development (as outlined in Section 3), and that housing on the site would support the economic growth of the Airport, the distribution of housing within the Local Plan should be reviewed as suggested to ensure accordance with the National Planning Policy Framework.

Summary:

Strongly object to the current designation of the site within the Countryside Policy Area and the omission of the Higgins site189 from allocation within Policy 6. Site 189 should be removed from the Countryside Policy Area and added to the list of housing allocations. Reasoning... to meet future short medium term housing requirement (see policy 3). Allocation would deliver new sustainable development on part brownfield land. Site 189 is suitable, deliverable and developable for housing, and capable of being brought forward and allocated for housing within the Local Plan. Site 189 borders the Finningley development boundary and contains existing built form associated with the commercial use of the site. Substantial growth is anticipated in association with airport site, resulting in job creation and a need for housing locally supporting policy 7. Policy 7. Site ref 940 is isolated from the existing settlements surrounding the airport and would result in a residential scheme that in our view would not sympathetically integrate with the existing area is a significant distance from the centre of Auckley-Hayfield Green or Finningley and would increase car usage. Higgins site 189 is more sustainably located. The representation lists greenbelt and flood zone three housing allocations put forward to the local plan as examples and says the sites are less sequentially preferred compared to Higgins site 189. Higgins’s Site is not situated within the Green Belt and is located within Flood Zone 1. Site 189 is suitable, available and achievable for housing development (as
Response:

There is no need to allocate any more land at Finningley (the location with the smallest housing requirement and the fewest services out of all the settlements identified for housing), and this site would form large urban extension to the settlement. Policy 7 / Appendix 3 and the Housing Topic Paper sets out the preferred location for potential housing at the airport and the rationale. Although there are a number of sites in the South East of the borough that are non-flood risk and not Green Belt, there is also a need to deliver a sustainable and appropriate pattern of delivery across the borough, not just focussing all housing delivery in areas which are not constrained.

Response:

As set out in the Housing Topic Paper, the requirement for Finningley is 55 units, and the Site Selection Methodology demonstrates that 50 of these can be delivered via existing commitments. There is no need to allocate any further sites in this location, and this site would result in a number of houses far in excess of what is required or justifiable in this peripheral village location which is also countryside.
3.2 The site, known as Higgin’s Potato Stores, Old Bawtry Road, Finningley (LPA ref: 189) is assessed within the Council’s HELAA document (2017), however, the emerging Local Plan discounts this site, along with other promoted land surrounding Finningley, on the basis that sufficient land is already committed within Finningley to meet the housing need. 3.3 The following section provides a detailed assessment of the Higgin’s Site and confirms why it is available, suitable and deliverable for development and should therefore be allocated for Housing to meet future need. Site Location: 3.4 Site 189 comprises land east of Old Bawtry Road, a significant part of which is currently occupied by the built form as shown in Fig. 3. 3.5 The site is located approximately 12.8km east of Doncaster and immediately to the east of Doncaster Sheffield Airport. (SEE EMAIL FOR Figure 3: Aerial View of the Site and Surrounding Area) 3.6 The site comprises of 36 hectares of part-brownfield, part-greenfield-land (with a capacity of up to 221 dwellings, but with an additional capacity of up to 827 dwellings if required). 3.7 Directly to the north of the site is Finningley village. To the east of the site is the A614 Bawtry Road and aggregate works access via Croft Lane. To the south of the site is dense woodland, beyond which is the Doncaster Moto Cross Centre. 3.8 Access to the site is currently taken from Old Bawtry Road on the western boundary of the site. This access point is well-established and has clear visibility. The principle of residential development would not create a demonstrably adverse impact on highway safety or volumes of traffic. Proximity to Local Facilities: 3.9 There are a number of local services and facilities within Finningley and the surrounding area, which are easily accessible from the site using alternative means of transport to the private car and include: - Post Office/Convenience Store - Village Hall - Public Houses - The Harvey Arms - Station Hotel - Primary Schools - St Oswald’s C of E Academy - Finningley C of E Primary School - Hayfield School (secondary school) - In neighbouring Ackworth - New College (sixth form) - in neighbouring Ackley - Mayflower Medical Practice (open every weekday) - Finningley Park - Golden Sun Takeaway. 3.10 The centre of Finningley is accessible from the site by public footpath along Old Bawtry Road. In addition, Public Rights of Way dissect the site and provide a direct link to the village centre. 3.11 The site is accessible by public transport with the nearest bus stop being located approximately 400 metres away at The Green in the centre of the village. This bus stop is served by routes 57f/58f, which provides access up to twice an hour to Doncaster town centre. 3.12 The DSA Masterplan confirms that funding is currently being sought for a new airport railway station, which would be located on the part of the existing railway line adjacent to the Hurst Lane. This would be within close proximity to Finningley village and would provide frequent public transport connections towards Sheffield and Lincoln. Landscape/Visual Impact: 3.13 The development of this site for housing would significantly improve the landscape character of the area given the large scale dominant buildings and vast areas of hardstanding and untidy storage areas within the site. The visual amenity of the surrounding area would be improved through the development of the site. 3.14 With the demolition of the large factory buildings on the site and the delivery of a sensitive residential development, it can be considered development would make a positive contribution to the local landscape and visual amenity. 3.15 The site topography is relatively flat with a significant block of woodland to the south west of the site. The existing settlement edge of Finningley is to the immediate north of the site and the site could form a natural extension to the village. 3.16 It is considered that residential development on the site could enhance the local landscape and make a positive contribution to visual amenity. Heritage Impact: 3.17 The site is not within a Conservation Area. There are no listed buildings or other defined heritage assets within the boundary of the site or within close proximity to the site. Flood Risk/Drainage: 3.18 The site is located in Flood Zone 1 as illustrated in the Environment Agency’s online flood map records. The site is considered to be at low risk of flooding. There are no known drainage constraints which would form insurmountable barriers to the delivery of this site subject to detailed design and consideration of infrastructure capacity. Ecology/Trees: 3.19 The brownfield parcel of the site is expected to have limited ecological value. The larger greenfield parcel of the site is currently in active agricultural use. There are very few trees onsite and the wider site is again expected to have little ecological value. 3.20 The site does benefit from established hedgerow boundaries which are expected to be of some ecological importance. By retaining the existing boundary treatment and enhancing where necessary alongside other opportunities for further planting within landscaped and garden areas, development of the site will enhance the ecological value of the site overall and offer an improved habitat network to the local green infrastructure network. 3.21 A Preliminary Bat Survey (PBS) has been undertaken by Wardell Armstrong (Appendix 2). The PBS consists of a desktop study and an inspection of the site. This confirms that there are several mature trees and four buildings which are suitable for roosting bats, and that it will be therefore necessary to undertake emergence surveys and/or climbed inspections in the event that development proposals are likely to adversely affect any roosts which may be present. (SEE EMAIL FOR Appendix 2) 3.22 The PBS states that the vegetated parts of the site are suitable for foraging bats. The PBS goes on to note that it may be necessary to undertake activity surveys to establish levels and distribution of site usage by foraging bats such that appropriate mitigation can be designed. 3.23 A botanical survey has been undertaken and recorded habitats to the south of the main access road (by the ponds), which are notable and ideally should be retained if at all possible. Elsewhere, the habitats identified should not constrain the proposal. 3.24 In relation to newts, ponds have been subject full EDNA surveys at the correct time this summer and no evidence of newts was found. 3.25 It is considered that the residential development of the site could be undertaken without adverse harm to biodiversity. Highways Safety: 3.26 A Highways Scoping Note (HSN) has been prepared to inform the initial consideration of the brownfield element of the site (Appendix 3). The HSN outlines that based on the anticipated number of trips generated by such residential development and the distribution of the local highway network, a number of nearby junctions are calculated to have an increase of 30 or more two-way movements during the network peak hours, and will have capacity assessments undertaken upon them. (SEE EMAIL FOR Appendix 3) 3.27 However, it is considered at this stage that the residential development would not create a demonstrably adverse impact on...
highway safety or volumes of traffic. 3.28 The HSN notes that site access will be controlled by a single priority controlled T-junction, and that no right turn ghost island is considered to be required given that the south, Old Bawtry Road turns into a dead end. HELAA Representations 3.29 The most recently available Housing and Economic Land Availability Assessment (HELAA) published July 2019, but with an April 2018 base data, identified the site under reference: 189 - Higgins Agriculture Ltd, Old Bawtry Road, Finningley. 3.30 The HELAA assessment identified that the site: - Is not on land that is contaminated. - Benefits from all essential utility services. - Could be appropriately mitigated from noise from the airport. - Is suitable, but with local policy constraints. - Is developable in a timeframe of 0-5 years for 827 units. Availability 3.31 The site is under single ownership and there is a strong interest in developing the site from Bellway Homes. The submission of the pre-application enquiry for the residential development of the site confirms interest in developing the site (Appendix 1 contains the reports and plans supporting this pre-application submission). The site is no longer required for commercial use by the landowner. (SEE EMAIL FOR Appendix 1) 3.32 There are no physical constraints to suggest that a carefully designed residential development could not be brought during the plan period. There is a significant opportunity to provide much needed housing for the settlement of Finningley. Suitability 3.33 The site is within a suitable location for residential development and this would contribute to the creation of sustainable, mixed communities. 3.34 The site is currently located within Countryside Policy Area, however it is partly brownfield land, is adjacent to the existing settlement boundary and is considered to be in a sustainable location, supported by village services and public transport links. 3.35 The village of Finningley has a number of local services. There are also convenient public transport links via bus into Doncaster and throughout the surrounding area. 3.36 The site itself, which is partly brownfield, has strong natural boundaries and is adjacent to existing residential development to the north, meaning the site could provide a natural extension to the village. Suitable access to the site is already established from Old Bawtry Road, where there is clear visibility in both directions. 3.37 Residential development on the site has been assessed as viable, and would be attractive to the market. There is more than a reasonable prospect that housing on the site will be deliverable within 5 years. Achievability 3.38 The site is available for residential development now, suitable in a sustainable location for growth with development readily achievable to commence within the next five years of the plan period. The allocation of this site for housing would help achieve the Government's aims and objectives regarding the delivery of additional residential stock throughout the Country and serve to meet the specific objectively assessed housing need. There are no insurmountable physical constraints which would prevent the efficient use of this site for residential development. 3.39 The site is within a sustainable location in terms of access to essential shops, services and infrastructure. The site is adjacent to the settlement boundary and would support the growth aspirations of the emerging Local Plan. Capacity 3.40 The site area is approximately 36 hectares and we would suggest that new residential development could initially be focused within the brownfield element of the site, providing capacity for up to 221 dwellings, with additional capacity for further dwellings in the longer term. Conclusions 3.41 Site 189 provides the opportunity to deliver additional, sustainably located housing adjacent to the existing settlement of Finningley. The site, which is partly brownfield land, is adjacent residential development and the allocation of this site for housing would provide a logical extension to the village of Finningley. The site has no overriding environmental constraints. The site is available and deliverable in the short term and represents the most sustainably located site for housing within the Finningley area. There is a strong interest in developing the site from Bellway Homes as confirmed by the submission of a pre-application enquiry for residential development at the site. 3.42 Based on the above information, the site is considered to be suitable, deliverable and developable and subject to policy designation is capable of being brought forward and allocated for housing within the emerging Local Plan.

Summary:

Verbatim comments provide detailed site specific information relating to Higgins site 189. Including site location, proximity to facilities, landscape and visual impact, heritage impact, flood risk and drainage, ecology and trees, highways and HELAA representations, availability, suitability, achievability, capacity and conclusion. Site 189 can deliver additional, sustainably located housing adjacent to the existing settlement of Finningley. The site, which is partly brownfield land, is adjacent residential development and the allocation of this site for housing would provide a logical extension to the village of Finningley. The site has no overriding environmental constraints. The site is available and deliverable in the short term and represents the most sustainably located site for housing within the Finningley area. There is a strong interest in developing the site from Bellway Homes as confirmed by the submission of a pre-application enquiry for residential development at the site. The site is considered to be suitable, deliverable and developable and subject to policy designation is capable of being brought forward and allocated for housing within the emerging Local Plan.

Response:

As set out in the Housing Topic Paper, the requirement for Finningley is 55 units, and the Site Selection Methodology demonstrates that 50 of these can be delivered via existing commitments. There is no need to allocate any further sites in this location, and this site would result in a number of houses far in excess of what is required or justifiable in this peripheral village location which is also countryside.
Tests of Soundness:

Comment:
This representation is prepared by Lichfields on behalf of our Client, Swan Homes Ltd. It presents our response to Doncaster Council's ("the Council") Local Plan Publication Draft (June 2019) (DLP) and considers whether the DLP has been positively prepared and is justified, effective and consistent with national policy. It is prepared in the context of our Client's land at Station Road, Finningley (HELAA reference 317) and our Client's interest in bringing forward a residential development at the site.

Summary:
Site 317 (countryside) should be included within the development limits of Finningley.

Response:
Noted
Policy 6 sets out the housing allocations for the DLP, both with and without planning permission. Table H1(O) shows the allocations for Finningley, with 50 units being allocated over three sites. However, para.16.220 of the DLP states that Finningley has a housing requirement of just 55 to meet its baseline local needs requirement for the plan period (based on Policy 3). This represents a shortfall of a minimum of five homes over the plan period which represents 10% of Finningley’s minimum housing requirement not being met. Policy 6 clearly fails to meet the NPPF’s call for positive plan preparation, outlining that plans should “be prepared positively, in a way that is aspirational but deliverable” (paragraph 16 of NPPF). By actively planning to fail to meet the minimum requirement at this stage, the DLP cannot be said to be sound within the bounds of the NPPF. This can be rectified by allocating additional land at Finningley for housing and revising the development limits of Finningley to allow for additional homes to be delivered. As detailed further below, our client’s land represents a suitable and sustainable location for new housing and we request that it is allocated for housing and that the development limit for Finningley is revised to include the site. Our client’s site is to the east of Station Road, Finningley, lies to the north of Robin Hood Airport and is approximately 10km east of Doncaster. The site measures approximately 0.8ha in size and comprises an area of hardstanding, scrubland and trees. It is bounded by: - Residential development off Station Road and on the site of White & Carter wholesalers, the plot of land immediately to the west of the proposal site also has planning permission for residential development; - An open field and Blakestone Glade residential development to the north; - Copses of trees and a storage area for caravans, trailers and haulage vehicles with a dirt track access road to the east; and - A caravan storage area and railway line to the south. Initial plans, subject of a pre-application enquiry submitted to the Council, demonstrate that the site could accommodate 39no. units of high-quality family housing and incorporate associated car parking, landscaping, open space and sustainable urban drainage. Our client’s site is in a sustainable location for housing and is well served by local public transport connecting Finningley to Doncaster Town Centre. There are two bus stops within 250m of the site, which run frequent bus services to Doncaster. The site is also in close proximity to a pub, sports pitches, a range of schools and healthcare facilities, including: - Nearest shop (Finningley Post Office): 450m - Nearest primary school (Hayfield Primary): 2.1km - Nearest secondary school (Hayfield School): 2.2km Neighbouring uses include recently completed earlier phases of Swan Homes Ltd’s residential development immediately to the north and west of the application site (45 houses in total) (08/00563/OUTM, 12/01327/EXTM) with approval recently granted for a further 14 houses to the west (18/02593/FULM). Storage areas and railway infrastructure lie to the south of the site, alongside the railway. There are large tracts of agricultural land and open space to the north and east. There are no listed buildings within 700m of the site. The site has been identified as suitable location for housing within Doncaster’s HELAA (2017) and is described as a brownfield urban extension site. The recent approval of applications for residential development immediately to the west clearly confirms the Council’s view that this is a suitable location for housing.

Summary:
Policy 6 - Housing Allocation. 1. Finningley is shown as having a shortfall of 5 units (10%) over the plan period. 2. Having a shortfall does not comply with the NPPF. 3. Site 317 should be allocated to meet the requirement. 4. Settlement profiles indicate that Finningley scores well and could support additional homes. Housing Strategy. 1. Para. 4.77 should read (2018-2033) not (2018-2035). 2. Fails to meet annual housing requirement. Should be a minimum figure to achieve annually (920). 3. Shift from over provision in early plan period to under provision later will have economic implications - job losses in construction industry. 4. Growth must be sustained across the plan period.

Response:
Although there is a shortfall of 5 units in Finningley, it is not felt that this is sufficient enough to warrant the allocation of any additional sites, the allocation of which would result in significantly more houses being delivered than necessary here. The Housing Topic Paper discussed trajectories more. Both the use of a range and using the Standard Methodology figure for calculating 5 year supply is supported in Planning Practice Guidance / NPPF.
17. It is clear that the Parish Council do not accept that there are any exceptional circumstances to justify development into the Green Belt in the area west of the A1(M). However it has considered which, if any, of the sites submitted under the Call for Sites would be the most suitable for new housing. The Parish Council would challenge the decision to choose site 929 Cadeby Road. 18. Throughout the whole of Sprotbrough 5 sites were submitted in the Call for Sites. Of these 3 were in Sprotbrough west of the A1(M) and therefore all in the Green Belt: 788 Melton Road just west of the A1(M) 252 Spring Lane 872 Melton Road towards High Melton (Site 929 Cadeby Road was added later) 19. The Sprotbrough Neighbourhood Plan Group’s view with regard to the 3 sites (endorsed by the Parish Council) was that the obvious site that would have the least impact on the Green Belt was site 788. It would have the least impact on other residential areas, it was on the bus route, was close to a primary school and, unlike the others, would not add to the major traffic/parking problems that already exist around the Main Street/Thorpe Lane area of Sprotbrough. 20. However DMBC planners decided that, in their opinion, site 929 Cadeby Road would be more suitable. Correspondence with Planning has revealed that their grounds for this opinion are in summary; that it would have the least impact on the Green Belt and was the right size for the proposed number of houses planned, whereas the other three sites were too big and could therefore be used to build more houses in the future. 21. The Parish Council believes that both opinions are mistaken. Site 788 makes much more sense: - 788 would clearly have the least impact on the Green Belt - unlike 929 - 788 would clearly have the least impact on other residential areas - unlike 929. - 788 has good access to public transport - unlike 929 - 788 would not add to the major traffic congestion and parking problems that already exist around the Main Street/Thorpe Lane area of Sprotborough - unlike 929. 22. The fact that site 788 was larger than 929 could be seen as an advantage looking to the future, not a disadvantage.

Summary:
Notwithstanding the Parish Council’s objection to a failure to demonstrate exceptional circumstances to justify development into the Green Belt in the area west of the A1(M), it has considered which, if any, of the sites submitted under the Call for Sites would be the most suitable for new housing. Sprotbrough Neighbourhood Plan Group’s view (endorsed by the Parish Council) is that the most obvious site that would have the least impact on the Green Belt is site 788. It would have the least impact on other residential areas, it on a bus route, is close to a primary school and, unlike the others, would not add to the major traffic/parking problems that already exist around the Main Street/Thorpe Lane area of Sprotbrough. However DMBC planners decided that, in their opinion, site 929 Cadeby Road would be more suitable because it would have the least impact on the Green Belt and was the right size for the proposed number of houses planned, whereas the other three sites were too big and could therefore be used to build more houses in the future.

Response:
Disagree that site 788 is the best option in this location. The Green Belt Review shows that Site 929 has less impact on the Green Belt, and this site can deliver the amount of houses needed in the settlement. 788 is a large linear site that is adjacent to the motorway and less well related to the settlement functionally and physically - and it would create an unusual, pincer like urban form in the settlement.
I submit that the Plan in relation to Sprotbrough does not meet "the Test of Soundness" as it is inconsistent with National Policy. Selection of Site 929 16. Even if there was a case for building in the Green Belt in the area, the question would arise which, if any, of the sites submitted under the Call for Sites would be the most suitable for new housing and I would challenge the decision to choose site 929 Cadeby Road. 17. Throughout the whole of Sprotbrough 5 sites were submitted in the Call for Sites. Of these 3 were in Sprotbrough west of the A1(M) and therefore all in the Green Belt: 788 Melton Road just west of the A1(M) 252 Spring Lane 872 Melton Road towards High Melton (Site 929 Cadeby Road was added later) 18. The obvious site that would have the least impact on the Green Belt was site 788. This was the view of the Parish Council. It would have the least impact on other residential areas, it was on the bus route, was close to a primary school and, unlike the others, would not add to the major traffic/parking problems that already exist around the Main Street/Thorpe Lane area of Sprotbrough. 19. However DMBC planners decided that, in their opinion, site 929 Cadeby Road would be more suitable even though Site 788 makes much more sense: - 788 would clearly have the least impact on the Green Belt - unlike 929 - 788 would clearly have the least impact on other residential areas - unlike 929. - 788 has good access to public transport - unlike 929 - 788 would not add to the major traffic congestion and parking problems that already exist around the Main Street/Thorpe Lane area of Sprotbrough - unlike 929

**Summary:**
Challenge the decision that 929 is the preferred site. Of the site options in Sprotbrough, the obvious site which would have the least impact on the Green Belt is Site 788. This was the view of the Parish Council. Unlike site 929, site 788 would have the least impact on the Green Belt, the least impact on residential areas, has good public transport access and would not exacerbate existing traffic and parking problems.

**Response:**
The Green Belt Review Stage 3 assessed all sites in Sprotbrough and shows that site 929 had a 'moderate' case for continuation in the site selection process, whereas the other three sites all had a 'moderately weak' case. The justification and exceptional circumstances for selecting site 929 is set out in the Green Belt Topic Paper.
Tests of Soundness:

Consistent with national

Comment:

I submit that the Plan in relation to Sprotbrough does not meet "the Test of Soundness" as it is inconsistent with National Policy. Encroachment into the Green Belt 1. Doncaster's Draft Local Plan reiterates the proposals in the Draft Sites and Policies of the Local Plan (autumn of 2018) and disregards the objection made by myself, the Parish Council, the Neighbourhood Plan Group and others. 2. The Draft Plan proposes an allocation of 80 new homes on: "A single greenfield urban extension, on land formerly designated as Green Belt, to the north of Cadeby Road and to the west of the village." 3. DMBC Planners have not clarified or explained the reasoning for their decision to divide Sprotbrough into two areas, east and west of the A1(M) and designate that to the west "Sprotbrough Village". The Draft Local Plan fails to address this crucial issue which is fundamental to the decision to encroach into the Green Belt. 4. The whole of Sprotbrough is one community and is all within the Parish boundary. It is vitally important for the maintenance of community cohesion that the whole of Sprotbrough is treated equally. However, DMBC Planners have drawn an arbitrary line on Melton Road at the A1(M). 5. The draft Neighbourhood Development Plan area covers the whole of Sprotbrough and it has been approved by DMBC. DMBC Planners have been advising the Neighbourhood Plan Group and no suggestion was made that Sprotbrough should be divided into two areas. 6. The reason this issue is crucial is because if Sprotbrough is not divided into two areas, the justification for encroachment into the Green Belt disappears. 7. The National Planning Policy Framework (NPPF) makes it very clear that development into the Green Belt should only be permitted in exceptional circumstances. Exceptional circumstances do not exist here.

Summary:

The Local Plan does not meet the test of soundness and is inconsistent with National Policy. Re: Site 929 (Sprotbrough site in the Green Belt): - The Local Plan has disregarded the objections previously made by the consultee, Parish Council and Neighbourhood Plan group, and others. - DMBC have not explained why Sprotbrough has been divided into two areas east and west of the A1 (west being the village). This is fundamental to the decision to encroach into the Green Belt as without this, there would be no need to encroach into the Green Belt. The Parish boundary incorporates land to the east and west of the A1 and should be treated equally for the purposes of community cohesion. - The Neighbourhood Plan has been approved by DMBC and no suggestion has been made to divide Sprotbrough into two areas. - Exceptional circumstances do not exist here to justify encroachment into the Green Belt.

Response:

This matter is covered in the Housing Topic Paper. It is felt that there is a clear distinction between the two, which are separated by a swathe of Green Belt and the A1(M), and so Sprotbrough Village has been assessed as a separate entity to the Main Urban Area. It should be noted that if the village was subsumed into the Main Urban area, then the housing requirement there would also increase, more sites would be required, and this site would remain a potential housing option for the Main Urban Area.
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Comment:

I submit that the Plan in relation to Sprotbrough does not meet "the Test of Soundness" as it is inconsistent with National Policy. Doncaster Council's Housing Plans 8. DMBC's 10-year Housing Strategy adopted a figure of 920 new houses p.a. 9. The Council consulted on its 'Homes & Settlement' paper in March 2016. This set out the proposed distribution of housing around the borough. The Council also consulted on its updated Sustainability Appraisal of Doncaster's Growth Options which included an assessment of the Homes and Settlement paper. The consultation proposed that the economic growth-led housing be concentrated in and around Doncaster itself and the borough's seven main towns but that local needs for homes growth be distributed on a pro-rata basis (according to existing settlement size) to Doncaster and the Main Towns and also to ten other service towns and villages. The service towns and villages included only part of Sprotbrough, "Sprotbrough Village". 10. In other words it was not based on identified need in each area but on its share of Doncaster's total housing needs based on "settlement size". 11. This distribution produced figures for the plan period ranging from 42.71% (3,748 houses) for Doncaster Main Urban Area to 1.05% for the area they designated "Sprotbrough Village" (92 houses) which was defined as that part of Sprotbrough west of the A1(M). The rest of Sprotbrough was to be regarded as part of the Doncaster Urban Area. 12. As mentioned above, it has never been clear nor justified why a decision was taken to divide Sprotbrough in this way but separating that part of Sprotbrough west of the A1(M) from the rest of Sprotbrough and the Doncaster Urban Area and allocating new housing to this part of Sprotbrough inevitably meant any new housing would have to be in the Green Belt, since all the land surrounding the area is Green Belt. 13. Thus the only reason for any encroachment into the Green Belt was because DMBC planners had decided to divide Sprotbrough into two areas and allocate 1.05 % of new housing to the area west of the A1(M) on the basis of its "share" of Doncaster's overall housing requirements and not on any identified need in that part of Sprotbrough. (It is not clear if any attempt has ever been made to make an objective assessment of Sprotbrough's housing needs). 14. These are not "exceptional circumstances" in accordance with the National Planning Policy Framework. On the contrary, they arise as a result of a deliberate decision to develop into the Green Belt totally unnecessarily, even though there are plenty of other suitable areas of land around Doncaster. According to the council's Housing and Economic Land Availability Assessment (HELAA) "there is no shortage of suitable and deliverable/developable land in the borough to meet the emerging Local Plan's development needs for the plan period 2015 - 2032." 15. There is no justification for more houses to be built which encroach into the Green Belt around this area. Any new housing in the area would add substantially to the existing infrastructure problems.

Summary:

The housing distribution is not based on need, but on share of total housing needs based on settlement size. Sprotbrough has been split in two without any justification. Separating Sprotbrough village means that housing would inevitably have to go in the Green Belt, as all the land surrounding it is Green Belt. The only reason for encroachment is the fact the village has been separated and the need is based on a share of the overall borough housing requirement - not identified need. It is not clear if any attempt has been made to make objectively assess Sprotbrough's housing needs. These are not exceptional circumstances, rather they arise as the result of a deliberate decision to develop the Green Belt unnecessarily, even though there are plenty of other non - Green Belt sites around Doncaster. According to the HELAA there is no shortage of suitable deliverable / developable land in the borough to meet the emerging Local Plans development needs 2015 - 32. There is no justification to build on the Green Belt and any new housing would add substantially to the existing infrastructure problems.

Response:

This matter is covered in the Housing Topic Paper. It is felt that there is a clear distinction between the two, which are separated by a swathe of Green Belt and the A1(M), and so Sprotbrough Village has been assessed as a separate entity to the Main Urban Area. It should be noted that if the village was subsumed into the Main Urban area, then the housing requirement there would also increase, more sites would be required, and this site would remain a potential housing option for the Main Urban Area.
Tests of Soundness:
Consistent with national

Comment:
I submit that the Plan in relation to Sprotbrough does not meet "the Test of Soundness" as it is inconsistent with National Policy. "Test of Soundness" 20. The National Planning Policy Framework (NPPF) advises that the Planning Authority should submit a plan for examination which it considers is "sound": namely that it is: "Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in this Framework." 21. The policies in the NPPF are very clear on the importance of the Green Belt, for example: "Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified." "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development." "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations."

Summary:
Re: test of soundness The Local Plan should be consistent with national policy. The NPPF is clear on the importance of Green Belt, e.g. paras 137; 143; 144

Response:
The approach to Green Belt has been thoroughly and cautiously considered, as set out in the Green Belt Topic Paper. The NPPF is clear (para. 136) that boundaries can only be changed in exceptional circumstances and when updating a plan. The Local Plan is therefore fully in line with national policy and exceptional circumstances are set out in the Green Belt Topic Paper.
22. There are no "exceptional circumstances" or "very special circumstances" justifying development into the Green Belt. The proposal is not the result of an assessed need in that part of Sprotbrough but is solely the result of an allocation of housing to an area of its "share" of Doncaster’s total housing need, which would inevitably result in encroachment into the Green Belt. 23. Even if there were exceptional circumstances, site 788 would be the obvious choice for housing, not site 929. 24. I submit that the Draft Local Plan does not meet the "test of soundness" in respect of its housing proposals for Sprotbrough.

Summary:
There are no exceptional circumstances or very special circumstances for justifying this development in the Green Belt. It is not the result of assessed need, rather a share of Doncaster’s total housing need, which inevitably leads to Green Belt encroachment. Even if there were, 788 it the obvious choice for housing, not 929. The Local Plan does not meet the tests of soundness in respect of housing in Sprotbrough.

Response:
The exceptional circumstance justification is set out in the Green Belt Topic Paper. The Green Belt Review shows 929 is preferable in Green Belt terms to 788, and this provides a far more logical extension and site in this location to 788.
Comment Ref: C/Sprotbrough/04576/1/001

Attend Examination: Written Representation

Reason:

Area: Chapter 16: Spatial Proposals

Policy: Service Town/Village - Sprotbrough

Tests of Soundness:

Justified

Comment:
The planned building of houses on a greenfield site in Sprotbrough cannot be justified. That specific greenfield site is also the most sensitive out of the ones available. The roads in the middle of Sprotbrough cannot support a development that size. PROPOSED CHANGE Remove the requirement to build houses in Sprotbrough village and absorb the numbers elsewhere on brownfield sites. Building much needed housing should happen, particularly affordable ones but not on greenfield sites. Plenty of alternatives in the Doncaster area.

Summary:
The development of greenfield land in Sprotbrough cannot be justified. The site is one of the most sensitive out of those available. Local roads cannot support development of this size. Proposed change: Remove the requirement to build houses in Sprotbrough village and absorb the numbers elsewhere or on brownfield land. Building much needed housing should happen, particularly affordable ones, but not on greenfield sites. Plenty of alternatives in the Doncaster area.

Response:
The site has been identified in line with the site selection methodology. There are insufficient suitable and available brownfield sites to meet the borough's housing requirement without the use of some greenfield sites. Sites have been modelled to look at highway impacts in terms of both the local road network and strategic road network.
3.1 Our objection remains to the rejection of Site 252 and consider that the site should be allocated for housing in the Local Plan, for delivery within the Plan Period. The Publication Draft Local Plan identifies site 929 for housing to deliver a total of 80 dwellings in the plan period. It is not considered site 929 is the most appropriate site in Sprotbrough when considered against other reasonable alternatives as required for the Plan to be justified and sound. It is considered that site 252 represents a more suitable and sustainable option and should be included in the Local Plan for allocation. 3.2 Prior to addressing our specific reasons for the inclusion of the site we have some general comments on the Draft Policy 6 as currently presented, which remains unchanged since the previous Draft Policies and Proposed Sites consultation draft in September 2018. It would be helpful if the tables referred to in Policy 6 identifying sites with planning permission and without planning permission which are included within Chapter 16 were included in summary in Policy 6. 3.3 It would be helpful if a summary table was included in Policy 6 of total permissions, total proposed allocations and total proposed requirement within each settlement, in order to demonstrate how the distribution of proposed allocations fits with the strategy. 3.4 Having calculated the information relating to existing permissions within the Tables in Chapter 16 and referred to in Policy 6, there appears to be over 11,600 permissions (net) which are relied on for delivery within and beyond the plan period, which equates to 63% of the housing requirement. There does not appear to be any information regarding a non-implementation allowance. The Council monitor lapsed permissions, indeed the Council’s latest five-year housing land supply statement recognises lapsed permissions, yet going forward the Local Plan does not seem to account for any overall lapse rate. The onus should be on the Council to provide evidence to justify the application (or not) of a non-implementation / lapse rate to existing permissions. A 10% discount is an approach that has been found acceptable (fair and reasonable) in planning appeals which albeit may relate to the calculation of five-year housing land supply, is still relevant to the principle of discounting capacity from planning permissions. 3.5 Furthermore, the Local Plan should identify more sites than are required to meet the housing requirement for the Plan Period to provide a buffer to account for lack of delivery from identified allocated sites and provide for choice and competition in the market. It is clear from the Council’s own evidence that allocations don’t always deliver, with the Council having to reassess the non-delivery of UDP sites, adopted in 1998 that have not yet had planning permission approved. There still appear to be sites being taken forward as allocations that were allocations in the UDP. While there may be genuine reasons why these sites have not delivered over the last twenty years but are now considered capable of delivery, it nonetheless underlines the likelihood that some of the sites currently proposed for allocation will not come forward as anticipated. To ensure that the Plan is effective, a buffer of sites should therefore be included. 3.6 The identification of a buffer is in line with the Framework, which requires plans to be positively prepared and flexible, and accounts for the fact that the housing requirement should be seen as a minimum. Taking the above into consideration, it is considered that the Local Plan needs to identify additional land for housing, in order to identify sites to meet the requirement over the whole plan period and provide a buffer of sites.

Summary:

Objection remains to the rejection of Site 252 and consider that the site should be allocated for housing in the Local Plan, for delivery within the Plan Period. The Publication Draft Local Plan identifies site 929 for housing to deliver a total of 80 dwellings in the plan period. It is not considered site 929 is the most appropriate site in Sprotbrough when considered against other reasonable alternatives as required for the Plan to be justified and sound. It is considered that site 252 represents a more suitable and sustainable option and should be included in the Local Plan for allocation. It would be helpful if the tables referred to in Policy 6 identifying sites with planning permission and without planning permission which are included within Chapter 16 were included in summary in Policy 6. It would be helpful if a summary table was included in Policy 6 of total permissions, total proposed allocations and total proposed requirement within each settlement, in order to demonstrate how the distribution of proposed allocations fits with the strategy. There appears to be over 11,600 permissions (net) which are relied on for delivery within and beyond the plan period, which equates to 63% of the housing requirement. There does not appear to be any information regarding a non-implementation allowance. The Council monitor lapsed permissions, indeed the Council’s latest five-year housing land supply statement recognises lapsed permissions, yet going forward the Local Plan does not seem to account for any overall lapse rate. The onus should be on the Council to provide evidence to justify the application (or not) of a non-implementation / lapse rate to existing permissions. A 10% discount is an approach that has been found acceptable (fair and reasonable) in planning appeals which albeit may relate to the calculation of five-year housing land supply, is still relevant to the principle of discounting capacity from planning permissions. Furthermore, the Local Plan should identify more sites than are required to meet the housing requirement for the Plan Period to provide a buffer to account for lack of delivery from identified allocated sites and provide for choice and competition in the market. It is clear from the Council’s own evidence that allocations don’t always deliver, with the Council having to reassess the non-delivery of UDP sites, adopted in 1998 that have not yet had planning permission approved. There still appear to be sites being taken forward as allocations that were allocations in the UDP. While there may be genuine reasons why these sites have not delivered over the last twenty years but are now considered capable of delivery, it nonetheless underlines the likelihood that some of the sites currently proposed for allocation will not come forward as anticipated. To ensure that the Plan is effective, a buffer of sites should therefore be identified.
The Green Belt Review identified that Site 929 had a stronger case in Green Belt terms than other sites in this location. This fed into the consideration of exceptional circumstances, which, on balance it was determined did exist in the case of 929, which is also a smaller site more in line with the housing requirement here. It is considered that 929 is less harmful to the Green Belt and more suitable, as well as being a smaller site. Summaries of permissions and allocations are provided in the Housing Topic Paper for clarification. As the housing figure calculation for the Local Plan has not included things such as windfalls, permissions for 1 - 4 units, defined village development, potential airport development (as per Policy 7) amongst other things, the Council effectively has created a buffer and does not feel that further allowance needs to be made for this.

C/Site 252 - Introduction/04960/1/002

CUSREF: 04960
Name: Johnson Mowat
Date: 30/09/2019
Organisation: Johnson Mowat
Representing: Mr And Mrs S Hall
Comment Ref: 04960
Area: Chapter 16: Spatial Proposals
Policy: Service Town/Village - Sprotbrough
Tests of Soundness: Positively prepared Justified Effective Consistent with national

Comment:
1.1 This statement has been prepared to respond to the Doncaster MBC Local Plan Publication Draft having regard to whether the Draft Plan is sound when considered against the four tests of soundness as set out in the National Planning Policy Framework (the "Framework"). Plans are "sound" if they are: - Positively Prepared - providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; - Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; - Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and - Consistent with national policy - enabling the delivery of sustainable development in accordance with policies in this Framework. 1.2 Johnson Mowat make the following comments in relation to a number of Draft Policies in the Publication Draft and promote Site 252 off Spring Lane / Westmorland Way, Sprotbrough on behalf of the landowners Mr and Mrs S Hall. A separate Highways Supporting Statement is included at Appendix 1 which demonstrates the suitability of the site from a highways and transport perspective. It is considered that a justified reasonable alternative is to identify site 252 in Sprotbrough as a housing allocation, either in addition to or as an alternative to the Council’s chosen site 929. (SEE EMAIL FOR Appendix) 1.3 Johnson Mowat submitted representations to the Informal Consultation Draft Sites and Policies document in October 2018 on behalf of Mr and Mrs S Hall. A number of the comments made remain relevant, given the continuation of the Council’s approach in the Publication Draft.

Summary:
Introductory text in respect to the Local Plan, NPPF soundness tests and acting on behalf of landowners for Site ref 252 Spring Lane, Sprotbrough. A separate Highways Supporting Statement is included which demonstrates the suitability of the site from a highways and transport perspective. It is considered that a justified reasonable alternative is to identify site 252 in Sprotbrough as a housing allocation, either in addition to or as an alternative to the Council’s chosen site 929. Johnson Mowat submitted representations to the Informal Consultation Draft Sites and Policies document in October 2018 on behalf of Mr and Mrs S Hall. A number of the comments made remain relevant, given the continuation of the Council’s approach in the Publication Draft.

Response:
All sites in Sprotbrough have been assessed in the Green Belt Review, with site 929 clearly scoring as having less impact on the Green Belt than the other three site options, including this site. Additionally, site 252 would deliver a number of houses far in excess of what is required in Sprotbrough, unlike 929, and there are also significant access concerns with site 252.
Comment:

3.7 We have set out in the preceding section, a number of reasons why the Local Plan needs to identify additional deliverable housing sites. It is considered that Site 252 is a wholly logical site for inclusion in the Local Plan. It is available, achievable and in a suitable location for delivery within the plan period. There are no insurmountable constraints to future residential development and there is a commitment to delivering / developing residential dwellings in the short term. 3.8 As it stands the only real barrier to development is a settlement hierarchy (informed by a settlement audit) which can only be achieved by releasing Green Belt land and the reliance of allocating housing sites in flood risk areas. Sprotbrough is a sustainable Service Towns and Larger Village which is also very close to the Main Urban Area, yet does not receive a housing requirement proportionate to its sustainability status. The site is not in an area of high flood risk. The need to deliver housing in sustainable locations, close to the Main Urban Area, meeting the Governments aims of significantly boosting housing should not be disrupted by an inflexible settlement hierarchy approach and a Green Belt constraint.

Summary:

Site 252 is a wholly logical site for inclusion in the Local Plan. It is available, achievable and in a suitable location for delivery within the plan period. There are no insurmountable constraints to future residential development and there is a commitment to delivering / developing residential dwellings in the short term. As it stands the only real barrier to development is a settlement hierarchy (informed by a settlement audit) which can only be achieved by releasing Green Belt land and the reliance of allocating housing sites in flood risk areas. Sprotbrough is a sustainable Service Towns and Larger Village which is also very close to the Main Urban Area, yet does not receive a housing requirement proportionate to its sustainability status. The site is not in an area of high flood risk. The need to deliver housing in sustainable locations, close to the Main Urban Area, meeting the Governments aims of significantly boosting housing should not be disrupted by an inflexible settlement hierarchy approach and a Green Belt constraint.

Response:

All sites in Sprotbrough have been assessed in the Green Belt Review, with site 929 clearly scoring as having less impact on the Green Belt than the other three site options, including this site. Additionally, site 252 would deliver a number of houses far in excess of what is required in Sprotbrough, unlike 929, and there are also significant access concerns with site 252.
3.26 Site 252 is available now. The landowner has instructed Johnson Mowat, Martin Walsh Residential (Architects) and Andrew Moseley Associates (Transport and Development Planning Consultants) to positively progress the site towards 'Local Plan Allocation'. Such a commitment provides compelling evidence to demonstrate that Site 252 is available now. 3.27 Sprotbrough is a sustainable location. Further the Council has identified the site as being both developable, deliverable and suitable in the HELAA (December 2016). 3.28 At this stage the landowner is able to promote the site without involving strategic land promoters or housebuilders. Notwithstanding this position the landowner has had a number of written 'Expressions of Interest' from both; if this site becomes a Local Plan Allocation it would be the landowner’s intention to submit a planning application in the short term so as to ensure the site can be delivered at the earliest opportunity. Residential development is therefore achievable. Further, as the site is greenfield it is unlikely that there would be any abnormal costs capable of affecting viability. 3.29 Site 252 is not only deliverable and developable, it is also the most sustainable site within Sprotbrough and is now being supported by a pro development landowner. The site is well located and well served by local facilities. The site can be developed comprehensively without significantly diluting the five purposes of including land within the Green Belt. The site is better located in comparison with identified site 929 which would potentially dilute the five purposes of including land within the Green Belt by projecting the existing development limits toward existing properties on Melton Road and farm buildings on Toecroft Lane, thereby reducing the gap between Sprotbrough and High Melton. 3.30 The allocation of Site 252 would result in a logical rounding off to the north western edge of the settlement limit, with the ability to create a strong, durable and defensible new Green Belt boundary via appropriate design. 3.31 The allocation of Site 252 would provide for a mix of dwellings, including affordable housing and public open space. 3.32 Notwithstanding our consideration that the only site (site 929) in Sprotbrough identified to meet the settlement’s identified local need requirement is not as suitable as site 252, there is a case for identifying additional land to meet the aspirational economic growth of the Borough. Should Site 929 be retained, the allocation of Site 252 would provide an additional supply of housing therefore in line with national policy to significantly boost the supply of housing and in support of the aspirational economic growth of Doncaster and the wider Sheffield City Region. There is a clear need to identify additional land, outside areas of flood risk, in sustainable settlements. 3.33 Site 252 is an ideal candidate for a housing allocation in the Local Plan to meet the housing needs of Sprotbrough and the Borough within the Plan Period.

**Summary:**

Provides a summary of the site (Ref 252) and confirms that it is available, suitable and deliverable/developable and is in a sustainable location. There are expressions of interest from both land promoters and developers. The site is greenfield and free from abnormal development costs. It is the most sustainable site in the settlement and would not impact on Green Belt purposes. The site is better than the proposed allocation site (Ref 929) as this would protrude development limits towards High Melton. "52 is a logical rounding off to the north-western edge and can create a strong durable defensible boundary. The site can provide a housing mix including affordable housing and open space. There is a case for identifying additional land to meet the aspirational economic growth of the Borough. Should Site 929 be retained, the allocation of Site 252 would provide an additional supply of housing therefore in line with national policy to significantly boost the supply of housing and in support of the aspirational economic growth of Doncaster and the wider Sheffield City Region. There is a clear need to identify additional land, outside areas of flood risk, in sustainable settlements.

**Response:**

It is considered that site 929 is preferable in Green Belt terms to site 252 – as confirmed in the Green Belt Review. The incursion into the Green Belt is comparatively minimal for site 929 compared to 252, with the extension to the settlement is relatively in keeping with the existing built form. There is no need to identify additional land for release in addition to site 929 in Sprotbrough to meet the housing requirement.
The Stage 3 Arup Green Belt Sites Appraisal (May 2017) appraised 57 sites in the Green Belt that the Council identified as they were in settlements where there was known to be constraints on the supply of land. This included appraising Green Belt sites put forward in Sprotbrough. Following the Stage 3 Green Belt Sites Appraisal the Council have categorised the 57 appraised potential Green Belt sites into 5 categories of strength in terms of a case for further site selection work: Strong case Moderately Strong case Moderate case Moderately Weak case Weak case. 3.11 Site 252 was identified as a one of 19 sites in the 'Moderate weak case for inclusion in further site selection work.' We do however have a number of concerns with the scoring of the site against some of the Green Belt Purposes, and consider that the site scoring should be reconsidered. We consider that the site actually performs better than site 929, (which is the only other identified site in Sprotbrough, and has been identified as an allocation on the basis of it being the 'least sensitive' in Green Belt terms). 3.12 We disagree with the 'weak' score against the resultant boundary strength of Site 252. The Green Belt Review of the proposed green belt boundary, should the site be removed from the Green Belt is stated to be weakly defined by field boundaries which are unlikely to be durable. This has no consideration to the potential design mitigation, which could include a strong landscaped boundary to the north and west boundaries which could be durable. 3.13 We disagree with the scoring against Green Belt Purpose 2a. Site 252 is given the same score as site 929 on the basis of it falling within a 'Largely Essential Gap' between the Sprotbrough and High Melton to the west. Site 252 lies on the north western edge of Sprotbrough and does not encroach any further west than existing development. Site 929 lies on the south western edge of Sprotbrough and will undoubtedly encroach further west than the existing settlement edge, and should therefore be given a different score than Site 252. 3.14 It is considered that there is justification and exceptional circumstances to remove site 252 from the Green Belt. The benefits of allocating the site as a sustainable extension to the settlement limit of Sprotbrough outweighs the Green Belt Review Phase 3 findings. 3.15 The reasoning behind the rejection of site 252 is due to the Phase 3 Green Belt Review concluding that the site has a moderately weak case for inclusion in further site selection work. However, the Green Belt Review clearly states that it makes no decisions about what sites should or should not be allocated, 'which is up to the Council to decide based on an assessment of all evidence.' Indeed, the Council have chosen to allocate a site for 418 dwellings on a site with a 'Weak' case for inclusion, which is a poorer rating than site 252, therefore proving that the Council do not necessarily rely on the Green Belt Review in all cases. 3.16 In the case of Site 252, there is a need to consider all the evidence, that being Sprotbrough is a sustainable settlement, very close to the Main Urban Area, and the site is not within a flood risk area. There is a case for identifying additional housing land in such locations.

**Response:**

All sites have been scored in the Green Belt Review in a consistent manner by independent consultants Arup using an agreed methodology. It is considered a sound and rational approach to appraising the Green Belt. By their nature all Green Belt sites extend the settlement in one direction or another.
3.17 The Council’s Settlement Audit (December 2015) prepared as evidence base to inform the emerging Local Plan / Settlement hierarchy states that Sprotbrough has an overall score of 7 based on existing primary and secondary services in the village. Sprotbrough scored the same as Carcroft & Skellow, Tickhill and Bawtry which demonstrates it is one of the more sustainable of the designated Service Towns and Larger Villages identified in the settlement hierarchy. It is noted that the Council have updated and revised the Settlement Audit and prepared Settlement Profiles which has revised the scoring for Sprotbrough down to 4 services instead of 7. The Settlement Profile notes that "Sprotbrough is closely related to the Main Urban Area, which lies just eastwards across the A1 (M), and to the south at Warmsworth, meaning residents have quick access to the variety of services here via Melton Road." Despite being one of the more sustainable of the designated service towns and villages, which is close to the Main Urban Area the 'proposed total housing allocation' does not reflect this. In light of the flood risk concerns elsewhere in the Borough it is our view that further housing numbers should be directed towards Sprotbrough. Environment 3.18 Sprotbrough has three parks for walking and children’s play areas: Anchorage Lange, Sprotbrough Road and New Lane. The Sprotbrough Riverboat is a popular cruise that has been running through the beautiful waterways since 1975. Sprotbrough Flash Nature Reserve in the Don Gorge is a diverse area, rich in wildlife for bird watchers, enthusiasts and walkers. There is also Denaby Ings and cusworth Hall Museum & Park. Eating & Drinking 3.19 Sprotbrough has five pubs: The Boat Inn gastro-pub, The Ivanhoe, The Newton Inn, OTTO’s wine bar and Sprotbrough Country (private members) Club. Mehfil Indian Brasserie restaurant also serves the village. Further eating and drinking options are also available in nearbycusworth, Newton, Warmsworth as well as Doncaster have more options and international cuisine. Shopping 3.20 Convenience stores in the village are the Sprotbrough News and Spar Village Shop. In neighbouring Newton there is a Sainsbury's Local. There is a Morrisons in Doncaster and Asda in Balby. Education 3.21 Around the village and in the area there are a number of schools including: - Copley Junior School o Orchard Infant School o Saltersgate Junior School o Richmond Hill Primary School o Ridgewood School o Don Valley Academy o Outwood Academy Adwick o Campsmonth Academy Transport Links 3.22 A Highways Supporting Statement (See Appendix 1) has been prepared which makes it very clear that the site: - is capable of accommodating circa 185 dwellings. - Can be safely accessed from Westmorland Way and Spring Lane (see the Highways Supporting Statement). - Is the most sustainable site in Sprotbrough and can be easily accessed by non-car modes in line with national planning policy guidance. - Sprotbrough is just four miles west of Doncaster and that makes for easy access in the car as well as using public transport - buses number 49 and 219 run through the village every 15 minutes. It is also off the A1(M), for connections north and south, and to the M18. Robin Hood airport is 25 minutes away. (SEE EMAIL FOR Appendix) 3.23 The Sustainability Appraisal ('SA') of the Local Plan Publication Draft includes a summary of the sustainability appraisal of housing sites in Sprotbrough (Table 8.24). of the 34 sustainability criteria sites 252 and 929 have identical scores in 31. Site 252 scores better in two of the remaining criteria (3A ii Distance to Bus Stop, and 5A i Affordability. Therefore overall the SA scores site 252 better than site 929, yet site 929 is identified as a housing site in the Local Plan. - The inclusion of Site 929 ahead of Site 252 can be found in the Council’s summary of consultation comments to the previous consultation (Draft Sites and Policies in October 2018) which on page 222 states: "Ultimately it is felt that 929 will have the least impact on the Green Belt and can deliver the level of housing Sprotbrough needs, which has been determined through the Settlement Audit and Homes and Settlements work, and it is preferable to other sites at Sprotbrough." 3.25 We disagree with the Council’s conclusion that site 929 will have the least impact, for reasons outlined above. Further, site 929 does not allocate sufficient housing to meet the Council’s 95 dwelling requirement (minimum). A reasonable and justified alternative would be to delete site 929 and retain it in the Green Belt and allocate site 252. Whilst the indicative capacity of site 252 at circa 185 dwellings is above the Council’s 95 dwelling target in Sprotbrough, it should be remembered that this is an absolute minimum target. It would be appropriate to allocate land above the target given the sustainability of the Sprotbrough and its close connections with the Doncaster Main Urban Area.

Summary:
The Council’s Settlement Audit (December 2015) prepared as evidence base to inform the emerging Local Plan / Settlement hierarchy states that Sprotbrough has an overall score of 7 based on existing primary and secondary services in the village. Sprotbrough scored the same as Carcroft & Skellow, Tickhill and Bawtry which demonstrates it is one of the more sustainable of the designated Service Towns and Larger Villages identified in the settlement hierarchy. It is noted that the Council have updated and revised the Settlement Audit and prepared Settlement Profiles which has revised the scoring for Sprotbrough down to 4 services instead of 7. The Settlement Profile notes that "Sprotbrough is closely related to the Main Urban Area, which lies just eastwards across the A1 (M), and to the south at Warmsworth, meaning residents have quick access to the variety of services here via Melton Road." Despite being one of the more sustainable of the designated service towns and villages, which is close to the Main Urban Area the 'proposed total housing allocation' does not reflect this. In light of the flood risk concerns elsewhere in the Borough it is our view that further housing numbers should be directed towards Sprotbrough. The Representation provides a summary of the services and facilities available at Sprotbrough as well as a supporting Highways Statement. The Sustainability Appraisal of housing sites in Sprotbrough (Table 8.24) shows of the 34 sustainability criteria sites 252 and 929 have identical scores in 31. Site 252 scores better in two of the remaining criteria (3A ii Distance to Bus Stop, and 5A i Affordability. Therefore overall the SA scores site 252 better than site 929, yet site 929 is identified as a housing site in the Local Plan. We disagree with the Council’s conclusion that site 929 will have the least impact, for reasons outlined above.
Further, site 929 does not allocate sufficient housing to meet the Council's 95 dwelling requirement (minimum). A reasonable and justified alternative would be to delete site 929 and retain it in the Green Belt and allocate site 252. Whilst the indicative capacity of site 252 at circa 185 dwellings is above the Council's 95 dwelling target in Sprotbrough, it should be remembered that this is an absolute minimum target. It would be appropriate to allocate land above the target given the sustainability of the Sprotbrough and its close connections with the Doncaster Main Urban Area.

Response:
Sprotbrough's original score in the Settlement Audit included land in the Main Urban Area - this has now been amended to reflect Sprotbrough as a village, which scores 4 in the revised Audit and as such is less sustainable than other locations. This is reflected in the level of houses allocated to this settlement. Site 929 has less impact on the Green Belt compared to the other local site options, and can also deliver the level of housing required in the settlement. Therefore, there are deemed to be exceptional circumstances to release this site from the Green Belt. Housing can be found in the Main Urban Area and so housing is not required to be delivered in Sprotbrough to support the Main Urban Area.

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<tr>
<th>CUSREF: 05023</th>
<th>Name: Richard And Michelle Lewis</th>
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<tr>
<td>Date: 29/09/2019</td>
<td>Organisation:</td>
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<tr>
<td>Comment Ref: C/Site 929 and Sprotbrough/05023/1/001</td>
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<td>Attend Examination: Attend Hearing</td>
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<td>Reason: The promoters of other sites in Sprotbrough are objecting to the selection of site ref 929 as the preferred and allocated development site in the Local Plan and we will have additional information from our remaining technical assessment work that is currently underway to present to the Examination.</td>
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<td>Area: Chapter 16: Spatial Proposals</td>
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<tr>
<td>Policy: Service Town/Village - Sprotbrough</td>
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Tests of Soundness: 

Comment:
We are the owners and promoters of site ref 929 in Sprotbrough village. We support DMBC's published version of the Local Plan and believe site ref 929 offers a sustainable, viable and deliverable site for residential housing. However, we wish to raise a technical objection to DMBC's view that the site will be developed in years 6 to 10 as we believe development can be substantially completed within the first 5 years due to the level of pre-work we have undertaken, and the current level of interest being expressed by building companies. We also wish to reserve the right to comment further on all sites proposed for Sprotbrough in subsequent stages of the Local Plan process. We have enclosed a document which provides an additional evidence base to support the retention of site ref 929 as the preferred and allocated development site for Sprotbrough village within the Local Plan. In particular the quantitative assessment of traffic impacts should be considered and used as an additional reason to retain site ref 929 as the preferred and allocated development site for Sprotbrough village within the Local Plan (SEE EMAIL FOR Document)

Summary:
As owners and promoters, support is given to Site ref 929 in Sprotbrough village. However, object to view that the site will be developed in years 6 to 10 ? consider development can be substantially completed within the first 5 years due to the level of pre-work we have undertaken, and the current level of interest being expressed by building companies. Document enclosed providing additional evidence base to support the retention of site ref 929 as the preferred and allocated development site for Sprotbrough village within the Local Plan.

Response:
Support welcome. The trajectory is an estimate based on assumptions on lead in times agreed when the HELAA methodology was established. Things may come forward more quickly or slowly than projected based on a range of factors in reality. Trajectory is covered in more detail in the Housing Topic Paper.
Comment:
As owners of site 109 Sunderland Street Tickhill, we submit this consultation response in support of the proposed allocation as part of site 1028. The land is available for residential development and subject to allocation will come forward for development to support Doncaster’s housing supply requirement and the housing needs of Tickhill. As owners we are not aware of any constraints or covenants which would prevent the site from being developed in the plan period. Lastly I would like to add that as part land owners of site 1028 we are willing to work with the other land owner(s) to enable development.

Summary:
Own site 109 Sunderland Street Tickhill. Support site proposal 1028. The land is available for residential development. As owners, not aware of any constraints or covenants

Response:
Support welcome.
Comment Ref: C/Site 1028/0213/12/002
Attend Examination: Written Representation

Reason:

Area: Chapter 16: Spatial Proposals
Policy: Service Town/Village - Tickhill

Tests of Soundness:

Comment:
With regard to development site 1028(Sunderland Street Tickhill), it appears that the size of the site should read 2.9ha. That this site would only accommodate 74 dwellings at 25.5 per hectare is inadequate use of the lane and would not lead to the size of dwellings that the community needs. We consider that the site should be capable of accommodating at least 100 dwellings which are affordable.

Summary:
The site density for site 1028 is too low and is an inadequate use of the land which would not lead to the size of dwellings the community needs. The site size should read 2.9ha and it should be capable of accommodating at least 100 affordable dwellings.

Response:
The site size has been amended however the capacity remains as 74, as per indicative layouts submitted.
Policy 3 of the draft Local Plan includes a target for 165 new houses to be allocated at Tickhill. This was based on a sound rationale and justification for the appropriate strategy for delivering new homes within the Borough and on a sustainable approach to delivering new homes. This would deliver homes where they were needed that would reduce use of the car and support local services and hence rural communities. However, it is stated in 16.237 that ‘only a single site, equating to 74 units, has been assessed through the Local Plan site selection methodology as being supportable for allocation. Other sites were dismissed either due to importance to Green Belt purposes or problems with creating a safe and viable access’. As such, the remainder of the settlement’s housing requirement of 165 new dwellings (91 units) has been proposed through allocated supply at the Doncaster Main Urban Area and some of the Main Towns. This approach is not in line with the agreed strategy for the delivery of growth across the borough and is not a sustainable approach in line with guidance in the NPPF (paragraph 16). Paragraph 65 of the NPPF confirms that ‘Within this overall requirement, strategic policies should also set out a housing requirement ?', which reflects the overall strategy for the pattern and scale of development'. In addition, 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 (paragraph 59). The approach taken in the draft Local Plan does not propose to deliver an appropriate variety of sites or to meet the housing requirement where it is needed. Finally, paragraph 78 of the NPPF confirms that ‘To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive.’ Land adjacent to the south western boundary of Tickhill (to the east of Bawtry Road) has been proposed as a housing allocation to meet the identified required need for the settlement. The Green Belt study concluded that this was performing less well than other areas around Tickhill and, as such could be released from the Green Belt. It is a relatively small site with good pedestrian linkages to the existing network, is close to a bus services and within walking distance of the centre. The land is suitable for development and available. It is, therefore, deliverable and should be allocated to meet the identified housing requirement for this settlement. Submissions have been made to demonstrate that a safe access could be provided. The draft Local Plan is therefore NOT SOUND as it is: Not Positively Prepared - as it does not deliver new homes to meet the identified local need at Tickhill; Not Justified - as it is not an appropriate strategy for meeting the identified housing requirement across the Borough; Not consistent with national policy - see above PROPOSED CHANGE To make the Plan Sound land to the south west of Tickhill should be allocated for housing so that the identified housing requirement for Tickhill can be met.

Summary:
Policy 3 includes a target of 165 dwellings in Tickhill. This was based on a sound rationale and justification for the appropriate strategy for delivering new homes within the Borough and on a sustainable approach to delivering new homes. This would deliver homes where they were needed that would reduce use of the car and support local services and hence rural communities. However, only one site has been found with a capacity of 74 units. Other sites were dismissed due to access and Green Belt impacts. The shortfall of 91 is proposed elsewhere in the borough. This approach is not in line with the agreed strategy for the delivery of growth across the borough and is not sustainable in line with the NPPF (paras. 16, 59, 65 and 78). Land adjacent to the south western boundary of Tickhill (to the east of Bawtry Road) has been proposed as an allocation to meet the identified need in the settlement. The Green Belt review confirmed that this was performing less well than other areas in Tickhill and could be released from the Green Belt. The site is small with good pedestrian linkages, close to bus services and in walking distance of the centre. It is suitable and available. Submissions show safe access could be provided. The Local Plan is unsound as it does not meet the identified need at Tickhill, it is not an appropriate strategy for meeting the identified housing need across the borough and it is inconsistent with national policy. Proposed change: to make the plan sound, land to the south west of Tickhill should be allocated for housing so the local requirement can be met.

Response:
After thorough consideration, only one suitable site was found in Tickhill, which is accessible and not overly impactful on the Green Belt - thus helping the exceptional circumstances argument required to release land from the Green Belt. Sites in Tickhill are constrained by both access issues and Green Belt which makes finding suitable sites challenging. The shortfall can be met elsewhere in the borough as on balance, the harm to the Green Belt did not outweigh the need to deliver housing here.
Land of Lindrick Lane, Tickhill (Site Reference 356 in the HELAA), was identified as a Deliverable/Developable Site in the HELAA (although it does not have planning permission). (SEE EMAIL FOR Figure 4 Aerial Image of Land off Lindrick Lane, Tickhill) The Site would provide an urban expansion to the Service Town / Village of Tickhill. The site is circa 6.8 hectares in size and is adjacent to existing residential development, local highways (including the A60) and agricultural land / countryside. Please see Figure 4 above for reference. The land is greenfield in nature and is currently used for agriculture and is generally flat in topography. The site is under a single private ownership and whilst subject to a tenancy, this can be terminated and therefore the development potential is available immediately. There are trees and hedgerows located along the boundary of the site but this would not be a constraint to development. Suitable access is available off Worksop Road (A60). An improved / new junction can be designed to appropriate standards, including visibility spays with a second emergency access coming off Lindrick Lane. An Access Technical Note has been prepared by TPS consultants and this can be made available to the Council, if required. The site is located within Flood Zone 1. See Figure 5 below for an extract from the Flood Risk Map for the area. (SEE EMAIL FOR Figure 5 Extract from the Governments Flood Risk Map - From Rivers and Sea) Furthermore the site is not subject to surface water flooding. See Figure 6 below for an extract from the Surface Water Flood Risk Map for the area. (SEE EMAIL FOR Figure 6 Extract from the Governments Flood Risk Map - From Surface Water) There is an existing footpath located to the south east of the site however, any future development would retain this Public Right of Way (see Figure 7 below).

Furthermore, the site is not subject to any scheduled ancient monument’s or heritage assets. (SEE EMAIL FOR Figure 7 Extract from Doncaster’s Walking Map identifying Public Rights of Way) Finally, a Phase 1 Desk Survey was undertaken by Solmek which concluded that the site is unlikely to have been exposed to anything other than minimal contamination, with minimal construction/demolition waste from neighbouring sites to the north and possibly oils or fuel from vehicle spills the most likely sources local to the structures. Whilst the site is within a Coal Mining Reporting Area as defined by the Coal Authority, given that no negative findings are outlined in the Coal Mining Report, no further steps need to be taken to mitigate against risks from coal mining on this occasion. As such, there are no contamination concerns to prevent this site coming forward for development. The Phase 1 Desk Survey can be made available to the Council if deemed necessary. In conclusion, there are no known physical or technical restrictions to bringing the site forward for development. The only constraint to bringing the site forward for development in the short term is that the site is currently designated as Green Belt. Notwithstanding this, the site is considered a suitable to accommodate future housing development to meet the objectively assessment housing need for the Borough over the next 17 years. The site does not comply with all of the five purposes of the Green Belt as outlined at paragraph 134 of the NPPF. For example, no settlement is located within close proximity to the South of Tickhill and subsequently development at the site will not impact on neighbouring towns. Oldcotes is the next settlement South of Tickhill and is located a substantial 5.1km away. It is also considered that development at the site would not have an impact on Tickhill Castle. Unlike other sites promoted in Tickhill as part of the Call for Sites Consultation, the site can accommodate the majority or all of the proposed 154 homes over the plan period to 2032. The site is sufficiently large enough for amenity space and green areas to be incorporated into a proposed site layout design. The Sandbeck Estate welcomes discussions with the Council should they want to allocate the site in its entirety or in part. The Estate also owns land south of the identified site and the Estate is also willing to discuss the potential to increase the suggested site boundary if favoured by the Council. The site has also received quite a bit of interest from volume housebuilders so it is considered a deliverable and viable site for future housing development. We therefore respectfully request that this site (Land at Lindrick Lane, Tickhill - HELAA Site 356) is deleted from the Green Belt and identified as a housing allocation in the next draft of the Local Plan. Based on a 75% developable area, it is considered that the site could accommodate circa 150 new dwellings and therefore easily accommodate the residual housing need for Tickhill.

Summary:

Site 356 ("Land off Lindrick Lane, Tickhill") should be allocated for housing. It is identified as a deliverable / developable sites in the HELAA and therefore has no physical or technical reasons as to why it could not come forward for residential development (the only constraint being that the land lies within Green Belt). Tickhill is a Service Town / Village located within twenty minutes of a number of a number of settlements which provide essential services and facilities. The landowner is supportive of residential development on the site which are available, suitable and achievable for residential development now. Tickhill has a housing requirement of 165 units and the Local Plan proposes a shortfall of 91 units which is made good through allocated supply at the Doncaster Main Urban Area and some of the Main Towns. This is unjustified and therefore unsound. Justification for this objection is based on work by landscape architects FPCR (supplied as an Appendix B). FPCR which provides a commentary on the Doncaster Green Belt Review (ARUP), and undertakes a ‘sense check’ of the published results. Site 356 would provide an urban expansion to the Service Town / Village of Tickhill. There are no known physical or technical restrictions to bringing the site forward for development (supporting information and maps provided). The site does not comply with all of the five purposes of the Green Belt as outlined at paragraph 134 of the NPPF. For example, no settlement is located within close proximity to the South of Tickhill and subsequently development at the site will not impact on neighbouring towns. Oldcotes is the next settlement South of Tickhill and is located a substantial 5.1km away. It is also considered that development at the site would not have an impact on Tickhill Castle. Unlike other sites promoted in Tickhill as part of the Call for Sites Consultation, the site can accommodate the majority or all of the proposed 154 homes over the plan period to 2032. The site is sufficiently large enough for amenity space and green areas to be incorporated into a proposed site layout design. The Sandbeck Estate welcomes discussions
with the Council should they want to allocate the site in its entirety or in part. The Estate also owns land south of the identified site and the Estate is also willing to discuss the potential to increase the suggested site boundary if favoured by the Council. The site has also received quite a bit of interest from volume house builders so it is considered a deliverable and viable site for future housing development.

Response:
The site has been assessed as having a weak case in Green Belt terms and there are reservations about access from Lindrick Lane. Every effort has been made to find suitable sites in Tickhill but there are a number of constraints which hamper this. The shortfall can be made up elsewhere. The Green Belt review carried out is independent and applies a consistent methodology.
There are a number of settlements located in close proximity to Tickhill which are listed below: - Doncaster (12.2km North); - Rossington (7.4km North East); - Harworth (7.4km South East); - Stainton (5km West); and, - Maltby (6.7km West). Tickhill is identified as a Service Town / Village and is located within twenty minutes of all the above settlements which provide essential services and facilities. The landowner is supportive of residential development at the three sites identified below which are available, suitable and achievable for residential development now. Tickhill has a housing requirement of 165 units to meet its local housing need target (See the Site Selection Methodology for the HELAA). The Regulation 19 Plan proposes to allocate a single site at ‘Sunderland Street’ for 74 units. As there are no commitments in the village, the Local Plan therefore proposes a shortfall of 91 units. The Draft Local Plan (paragraph 16.237) states that: As at 1st April 2018, there are no permissions large enough to allocate towards the town’s housing requirement (5+ units remaining) and only a single site, equating to 74 units, has been assessed through the Local Plan site selection methodology as being supportable for allocation. Other sites were dismissed either due to importance to Green Belt purposes or problems with creating a safe and viable access, from a Highways Development Management perspective, given the very rural nature of some of the road network around the settlement. Some sites are ruled out for both of these reasons. The remainder of the settlement’s housing requirement of 165 new dwellings (91 units) has therefore been made good through allocated supply at the Doncaster Main Urban Area and some of the Main Towns in line with Policy 3, which adds any unmet local housing need from settlements to the economic-led housing growth uplift. We fundamentally disagree with the findings of the Local Plan and consider that it is unjustified and therefore unsound. Our client’s site at Wong Lane (357) is preferable to the proposed site at Sunderland Street (1028). Our justification for this objection is based on work by landscape architects FPCR (Appendix B). FPCR were commissioned to undertake an Appraisal of the site known as ‘Land at Wong Lane’, to consider its contribution to the five Purposes of Green Belt, as set out in the NPPF, and to assess what the implications would be on the new Green Belt boundary should the site be removed from the Green Belt. This Appraisal provides a commentary on the Doncaster Green Belt Review (ARUP), and undertakes a ‘sense check’ of the published results, using professional judgement to reach conclusions on the suitability of this site for Green Belt release. The appraisal also provides a comparison between Sunderland Street and Land at Wong Lane, in terms of their contribution to the Green Belt Purposes, and the strength of the resultant Green Belt boundary (should these sites be removed from Green Belt) (SEE EMAIL FOR Appendix) Whilst ARUP conclude that both sites have moderate strength in terms of Purposes, it is important to acknowledge that Sunderland Street scores higher in terms of its contribution to the five Purposes of Green Belt. The combined scores for Sunderland Street are 20 (with 2 purposes scoring 4 or above), while the combined score for Wong Lane is only 14 (with 1 purpose scoring 4 or above). This also goes against the conclusion of the Stage 1 Assessment, in which General Area ‘Tickhill 7’ (in which Sunderland Street is located) scored significantly higher than ‘Tickhill 2’ (in which Land off Wong Lane’ is located). Development of Land off Wong Lane would not result in extending the existing settlement further north or west than currently defined by the development limits (or settlement boundary). As such, the development of this site would not lead to a reduction in the gap between Tickhill-Stainton and Tickhill-Wadworth, and would not therefore contribute to coalescence of settlements. In contrast, the development of Sunderland Street would result in a 5.38% reduction in the gap between Tickhill and Harworth. In terms of Purpose 4 (preserving the setting and special character of historic towns), the contribution of Sunderland Street is slightly greater than Land off Wong Lane, given its proximity to Tickhill Castle, and potential for glimpsed views of the motte from the southern extent of the site. Overall, Sunderland Street performs better than Land at Wong Lane in terms of contribution to Purposes, and such as the latter should be considered first in terms of further site selection work. It is considered that the Local Plan’s proposal to under-allocate sites in Tickhill and to use make good through the allocated supply in other towns is not an effective policy choice. It does not ensure that the vitality of Tickhill is maintained (as required by NPPF paragraph 78) and risks undermining local services such as the primary school and shops in the Tickhill. Our client has the following sites in Tickhill which are suitable, available and achievable and should be allocated for housing as part of the Doncaster emerging Local Plan: 1. "Land off Wong Lane, Tickhill" - HELAA Site 357; 2. "Land off Lindrick Lane, Tickhill" - HELAA Site 356; We also support the future allocation of the following two sites for residential development in the village of Stainton: 1. "Land at Manor Farm, Stainton" - HELAA Site 359 2. "Land North of Limekiln Lane, Stainton" - HELAA Site 358 Details of these five site are set out below respectively and location plans identifying the sites can be found at Appendix A. (SEE EMAIL FOR Appendix) (NOTE THIS REP IS FOR SITE 356 THE COMMENTS FOR THE OTHER SITES ARE INCLUDED UNDER THEIR REFNUMBER - SEE: 03569 / 04705)
Land off Wong Lane, Tickhill (Site Reference 357 in the HELAA), was also identified as a Deliverable/Developable Site (although it does not have planning permission). (SEE EMAIL FOR Figure 1 Aerial image of site off Wong Lane, Tickhill) HELAA Site 357 would provide an urban expansion to the Service Town/Village of Tickhill. The site is circa 3.65 hectares in size and are located adjacent to existing residential development and agricultural land. See figure 1 above for an aerial photograph of the site and surrounding land uses. The land is currently used for agriculture and is generally flat in topography. The land is under a single private ownership and whilst subject to a tenancy, the tenancy can be terminated for development purposes and therefore the development potential is available immediately. There are trees and hedgerows located along the boundary of the site but this would not be a constraint to development. The existing trees and hedgerows could be easily accommodated within a future residential development scheme. Access is available off Greystones Lane, off Wong Lane. An Access Technical Note was prepared by TPS Consultants Limited which concluded that a realigned access would be plausible along the northern boundary of the proposed housing site. The Access Technical Note can be made available if required by the Council. The site is located within Flood Zone 1 and is not subject to any flood risk issues. Furthermore, it is our understanding that Doncaster Metropolitan Borough Council has recently upgraded the main drains in this location. See Figure 2 and 3 below for extracts from the Flood Risk Map for the area. (SEE EMAIL FOR: Figure 2 Extract from the Governments Flood Risk Map - From Rivers and Sea Figure 3 Extract from the Governments Flood Risk Map - From Surface Water Flooding) The Site is not subject to any scheduled ancient monument’s or heritage assets. As such, there are no known technical or physical restrictions to bringing the site forward for residential development. This site has also received interest from volume housebuilders so it is considered a deliverable and viable site for future housing development. Furthermore, a Phase 1 Desk Survey was undertaken by Solmek which concluded that the site is unlikely to have been exposed to anything other than minimal contamination, with minimal construction/demolition waste from neighbouring sites and possibly oils or fuel from vehicle spills the most likely sources local to the site. Additionally, the site is within a Coal Mining Reporting Area as defined by the Coal Authority. No negative findings were outlined in the Coal Mining Report, thus no further steps need to be taken to mitigate against risks from coal mining on this occasion. Moreover, due to the sites current use and condition a ground gas assessment is not considered necessary. A copy of the Phase 1 Desk Survey can be made available to the Council, if required. The only constraint to bringing this site forward for development in the short term is that the site is currently designated as Green Belt. Notwithstanding this, the site is considered to be a well contain site within the Service Town/Village of Tickhill to accommodate future housing development to meet the objectively assessment housing need for the Borough over the next 17 years. The site is sufficiently large enough for amenity spaces and green areas to be incorporated into the detailed design and layout stage. The Sandbeck Estate welcome discussions with the Council should they seek to allocate the site. This site, on its own, or alongside land off Lindrick Lane, Tickhill (site 1 above), would help meet the housing needs of the Service Town, in sustainable well sited locations. We therefore respectfully request that this site is identified as a housing allocation in the next draft of the Local Plan. Based on an 80% developable area, it is considered that the site could accommodate circa 90 new dwellings over the Plan period.

Summary:
Site 357 ("Land off Wong Lane, Tickhill") should be allocated for housing. It is identified as a deliverable / developable sites in the HELAA and therefore has no physical or technical reasons as to why it could not come forward for residential development (the only constraint being that the land lies within Green Belt). Tickhill is a Service Town / Village located within twenty minutes of a number of settlements which provide essential services and facilities. The landowner is supportive of residential development on the site which are available, suitable and achievable for residential development now. Tickhill has a housing requirement of 165 units and the Local Plan proposes a shortfall of 91 units which is made good through allocated supply at the Doncaster Main Urban Area and some of the Main Towns. This is unjustified and therefore unsound. Justification for this objection is based on work by landscape architects FPCR (supplied as an Appendix B). FPCR which provides a commentary on the Doncaster Green Belt Review (ARUP), and undertakes a ‘sense check’ of the published results. Site 357 would provide an urban expansion to the Service Town / Village of Tickhill. The land is under a single private ownership and whilst subject to a tenancy, the tenancy can be terminated for development purposes and therefore the development potential is available immediately. Access is available off Greystones Lane, off Wong Lane. There are no known physical or technical restrictions to bringing the site forward for development (supporting information and maps provided). A Phase 1 Desk Survey was undertaken by Solmek which concluded that the site is unlikely to have been exposed to anything other than minimal contamination, with minimal construction/demolition waste from neighbouring sites and possibly oils or fuel from vehicle spills the most likely sources local to the site. The only constraint to bringing this site forward for development in the short term is that the site is currently designated as Green Belt. Notwithstanding this, the site is considered to be a well contained site within the Service Town/Village of Tickhill. The site is sufficiently large enough for amenity spaces and green areas to be incorporated into the detailed design and layout stage.

Response:
The site has been assessed as having a moderately weak case in Green Belt terms, and it is not felt suitable access can be created, given this site would join the corner of Wong Lane (either via a new access or Wilsic Lane - Greystone Lane is an unmade farm track), which is a 'U' shaped bend. The Green Belt review carried out is independent and applies a consistent methodology.
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Land off Wong Lane, Tickhill, which are combined with comments made and summarised elsewhere.

HELAA Site 357; 2. "Land off Lindrick Lane, Tickhill"

HELAA Site 356; Savills Plc

HELAA Site 358  Details of these five site are set out below respectively

Sandbeck Estate

HELAA Site 359 2. "Land North of Limekiln Lane, Stainton"

Rossington (7.4km SEE: 03568 / 04705)

Stainton (5km West); and,

We also support the future allocation of the following two sites for residential development in the village of Stainton: 1. "Land at Manor Farm, Stainton" - HELAA Site 359 2. "Land North of Limekiln Lane, Stainton" - HELAA Site 358 Details of these five site are set out below respectively and location plans identifying the sites can be found at Appendix A. (SEE EMAIL FOR Appendix)  (NOTE THIS REP IS FOR SITE 35)

Response:
The site has been assessed as having a moderately weak case in Green Belt terms, and it is not felt suitable access can be created, given this site would join the corner of Wong Lane (either via a new access or Wilsic Lane - Greystone Lane is an unmade farm track), which is a 'U' shaped bend. The Green Belt review carried out is independent and applies a consistent methodology.
To allow participation in discussions regarding the sustainability appraisal, settlement strategy, proposed housing requirement and distribution of development including site selection and allocations.

2.4 In providing an explanation of the choice of Option 4 as the preferred and improve traffic safety

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2.11 Of the 35 sites in this Moderately which the council acknowledge is the distribution that is best able to ensure local housing need is met and to

2.16 there are no access constraints that would prevent the development of the site, either in isolation or in conjunction with the adjoining site, reference 281. We requested the opportunity to discuss this proposed access design with the council, but did not receive a response. 2.18 Nor are there other constraints which would prevent the development of the site. We have previously submitted a Development S

2.17 Therefore, and contrary to the findings of the Site Selection conclusion of the Site Selection concur with that assessment and eliminate the site for a single reason

2.7 For Tickhill specifically, the strategy calls for in the region of 165 dwellings to be delivered in the town. The Local Plan allocates sites capable of accommodating just 74 of those homes. This is justified on the basis that only a single site in the town is suitable for development. 2.8 This is not correct. 2.9 The Site Selection report (note 4 - 4 Housing & Employment Site Selection Methodology & Results Report Publication Version - June 2019) considers a range of potentially suitable housing development sites in Tickhill. Many of those sites were filtered out of the selection process due to the impact their development would have on the Green Belt. 2.10 The site at Worksop Road, Tickhill (identified as site 930 in the various reports) was not eliminated from consideration on this basis. In fact, it was one of the sites which was considered to have a "Moderately Strong" case for inclusion in further site selection work based on its Green Belt function. Only two sites in the whole borough - neither of which are in Tickhill - were in the higher "Strong" case category which would be more suitable for release. 2.11 Of the 35 sites in this Moderately Strong category, site 930 is one of only 8 sites considered to have strong boundaries (none of the other 7 sites are in Tickhill). The site is also considered to only moderately perform the purposes of the Green Belt - only 4 sites in this category weakly perform the purposes of the Green Belt. It is, therefore, one of the better performing sites based on Green Belt function, and one of the sites that is most suitable for development. 2.12 The conclusions of the Site Selection concur with that assessment and eliminate the site for a single reason - the council consider that it is not possible to accommodate a suitable vehicular access to the site and claim that access is only possible to Lindrick Lane. This assessment is not correct. 2.13 We have previously provided the council with an access design for the site prepared by Croft Transport Solutions which shows how a satisfactory access could be provided to Worksop Road. This design can be found in the Transport Issues report at Appendix 1. (SEE EMAIL FOR Appendix 1) 2.14 The access requirements for a site such as this should be based on the criteria set out in Manual for Streets. For a 30mph road, the required visibility splays would be 2.4 metres by 43 metres. Croft TS have prepared an access design onto Worksop Road which accommodates those requirements without the need for any third party land. 2.15 Although the current speed limit on Worksop Road is 40mph, the 30mph zone starts immediately past the site adjacent to the first residential properties on Worksop Road. As part of any development of the site, it would be expected that this 30mph zone would be extended to include the new development, broadly to the position indicated on the Croft TS access drawing. That would also reduce vehicle speeds - and improve traffic safety - at the Worksop Road / Lindrick Lane junction. 2.16 Pedestrian access into the site can be provided by both linking into the existing footway adjacent to Lindrick Lane to the east, and extending the existing footway adjacent to Worksop Road (through site reference 281). 2.17 Therefore, and contrary to the findings of the Site Selection paper, there are no access constraints that would prevent the development of the site, either in isolation or in conjunction with the adjoining site. (reference 281). We requested the opportunity to discuss this proposed access design with the council, but did not receive a response. 2.18 Nor are there other constraints which would prevent the development of the site. We have previously submitted a Development Statement which summarises the main technical considerations in respect of the site. A copy of that Statement can be found at Appendix 2. (SEE EMAIL FOR Appendix 2) 2.19 It is clear that there are no barriers to the site's development. It's allocation would help move closer to their proposed distribution of new homes - which the council acknowledge is the distribution that is best able to ensure local housing need is met and to minimise the amount of development on sites that are at risk of flooding. 2.20 The Local Plan, as drafted, is therefore not sound. 2.21 Firstly, the proposed spatial distribution of new homes has not been subject to a sustainability appraisal. While an SA has been carried out, it only considers
the proposed distribution of new homes, not the actual distribution that the Local Plan results in. There are significant differences between the proposed and actual distributions. The SA does not consider the actual distribution of new homes. It does not therefore, meet the relevant legal requirements and the plan is unsound on that basis. Nor is there any evidence that the proposed distribution takes adequate account of the constraint to development posed by flood risk - although the spatial distribution purports to reflect that constrain, the actual distribution of growth based on the proposed allocations does not. 2.22 Secondly, the Plan does not meet the local need for housing growth that is identified as being required in Tickhill. It will not, therefore be effective in delivering the strategy it purports to be trying to deliver. 2.23 Thirdly, the Plan is not justified based on the evidence. It is apparent that there is no evidential basis for the proposed distribution of development and that the selection of sites has not been based on the information available to the council. Nor has the Plan been arrived at from a consideration of reasonable alternatives. At no point have the council considered the spatial distribution that would result from maximising development on sites which are not at risk of flooding. 2.24 Fourthly, the Plan is not consistent with national policy. While the proposed distribution of housing growth purports to take flood risk into account, the significant deviation from the "preferred" distribution has not maximised the opportunity to deliver new homes in areas which are not at risk at flooding. 2.25 To ensure soundness, the council should consider to what extent sites outside of flood zones which are not currently allocated for new homes could contribute towards housing supply. Once those sites have been identified, consideration to be given to what spatial distribution possibilities this would give rise too, and the implications for sustainability of each.

Summary:

Site 930 (Worksop Road, Tickhill) should be allocated for housing. For Tickhill, the Plan Strategy identifies a need for 165 dwellings in the town. The Local Plan allocates sites capable of accommodating only just 74 dwellings on the basis that only a single site is suitable for development. This is not correct. The conclusions of the Site Selection eliminate the site for a single reason - that it is not possible to accommodate a suitable vehicular access to the site and that access is only possible to Lindrick Lane. This assessment is not correct. A supplied access design for the site prepared by Croft Transport Solutions shows a satisfactory access could be provided to Worksop Road. There are no access constraints that would prevent the development of the site, either in isolation or in conjunction with the adjoining site (reference 281). Nor are there are other constraints which would prevent the development of the site. A Development Statement is submitted which summarises the main technical considerations in respect of the site. There are no barriers to the site's development. Its allocation would help move closer to their proposed distribution of new homes - which the council acknowledge is the distribution that is best able to ensure local housing need is met and to minimise the amount of development on sites that are at risk of flooding. The Local Plan, as drafted, is therefore not sound. Firstly, the proposed spatial distribution of new homes has not been subject to a sustainability appraisal. While an SA has been carried out, it only considers the proposed distribution of new homes, not the actual distribution that the Local Plan results in. There are significant differences between the proposed and actual distributions. Secondly, the Plan does not meet the local need for housing growth that is identified as being required in Tickhill. It will not, therefore be effective in delivering the strategy it purports to be trying to deliver. Thirdly, the Plan is not justified based on the evidence. There is no evidential basis for the proposed distribution of development and that the selection of sites has not been based on the information available to the council. Nor has the Plan been arrived at from a consideration of reasonable alternatives. At no point have the council considered the spatial distribution that would result from maximising development on sites which are not at risk of flooding. Fourthly, the Plan is not consistent with national policy. While the proposed distribution of housing growth purports to take flood risk into account, the significant deviation from the "preferred" distribution has not maximised the opportunity to deliver new homes in areas which are not at risk at flooding. To ensure soundness, the council should consider to what extent sites outside of flood zones which are not currently allocated for new homes could contribute towards housing supply. Once those sites have been identified, consideration to be given to what spatial distribution possibilities this would give rise too, and the implications for sustainability of each.

Response:

The Council’s highways team are of the opinion that suitable access is not achievable from Worksop Road. The site is also Green Belt, so this needs to be hung in the balance, were access issues to be overcome. As it stands, although there is a shortfall of houses in Tickhill against the target of 165, but this can be made good elsewhere in the Borough, with the overall levels of housing delivered being on target. The SA will now assess the proposed actual distribution of housing as highlighted. No allocations have been made in areas of flood risk, although permissions form part of the allocated supply. The Council has maximised opportunity to deliver homes in areas not at risk of flooding, in spite of the spatial strategy including areas at risk of flooding where these are also sustainable settlements. There has not been a significant deviation from the proposed housing distribution, most locations in the Borough can meet their housing requirements and the spatial strategy is largely maintained. There are clear reasons why Tickhill cannot meet its housing requirement as set out in the methodology, green belt topic paper and housing topic paper.
Tests of Soundness: Justified

Comment: The Site is located to the east of Castle Farm and is circa 0.8 hectares in size. It is surrounded by existing residential development to the west (along with Castle Farm steading), Tickhill Castle is located to the north of the Site and agricultural land is located to the south and east. The land is currently used for agriculture and is generally flat in topography with some underutilised agricultural buildings located within the site boundary. The land is under a single private ownership. Please see Figure 8 below for reference. (SEE EMAIL FOR Figure 1 Aerial Image of Stud Farm, Tickhill) There are trees located along the southern and northern boundary of the site but this would not be a constraint to development. The existing trees could easily be accommodated within a development scheme subject to an appropriate Tree Survey being undertaken to establish the healthy trees within the site. Furthermore, the majority site is located within Flood Zone 1 and is therefore not prone to flooding (see Figure 9 below for reference). It is noted that some of the land along the southern boundary of the Site is located within Flood Zone 2, however, it is not proposed that this land would be subject to development. As such, flood risk is not considered a constraint to the general development of the site as a whole. (SEE EMAIL FOR Figure 2 Extract from the Governments Flood Risk Map - From Rivers and Sea) In conclusion, there are no constraints to bringing this site forward for development in the short term other than it being located within the Green Belt. This site is considered a well contained site within Tickhill capable of accommodating future housing development to meet the objectively assessed housing need for the Borough over the Plan period. As the site is already partly developed with existing agricultural buildings, it is considered that the redevelopment of the site with high quality, well designed residential properties would lead to an effective use of the site. Whilst Tickhill Castle is located to the north (A Scheduled Monument List UID: 1004828) it is not considered that development of this site would have an adverse impact on the Castle. Well-placed and designed development can actually act as enhancement to a listed building. It is therefore considered that the site could accommodate up to 20 new dwellings over the Plan period. We therefore consider that the three aforementioned sites at Tickhill should be reassessed and allocated for residential development to help meet the housing needs over the Plan period and beyond.

Response: Tickhill does have a shortfall of housing against its allocated target, however it has a number of constraints to the delivery of housing, including Green Belt and access issues. The site in question has a weak case in Green Belt terms for continuation in the site selection process. It is also adjacent to Tickhill Castle and within the view of St Mary's Church in the Tickhill conservation area. As such, site 1021 scores particularly strongly against the historic aims of the Green Belt.
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There are a number of settlements located in close proximity to Tickhill which are listed below: - Doncaster (12.2km North); - Rossington (7.4km North East); - Warworth (7.4km South East); - Stainton (5km West) and, - Maltby (6.7km West). Tickhill is identified as a Service Town / Village and is located within twenty minutes of all the above settlements which provide essential services and facilities. The landowner is supportive of residential development at the three sites identified below which are available, suitable and achievable for residential development now. Tickhill has a housing requirement of 165 units to meet its local housing need target (See the Site Selection Methodology for the HELAA). The Regulation 19 Plan proposes to allocate a single site at 'Sunderland Street' for 74 units. As there are no commitments in the village, the Local Plan therefore proposes a shortfall of 91 units. The Draft Local Plan (paragraph 16.237) states that: As at 1st April 2018, there are no permissions large enough to allocate towards the town's housing requirement (5+ units remaining) and only a single site, equating to 74 units, has been assessed through the Local Plan site selection methodology as being supportable for allocation. Other sites were dismissed either due to importance to Green Belt purposes or problems with creating a safe and viable access, from a Highways Development Management perspective, given the very rural nature of some of the road network around the settlement. Some sites are ruled out for both of these reasons. The remainder of the settlement's housing requirement of 165 new dwellings (91 units) has therefore been made good through allocated supply at the Doncaster Main Urban Area and some of the Main Towns in line with Policy 3, which adds any unmet local housing need from settlements to the economic-led housing growth uplift. We fundamentally disagree with the findings of the Local Plan and consider that it is unjustified and therefore unsafe. Our client's site at Wong Lane (357) is preferable to the proposed site at Sunderland Street (1028). Our justification for this objection is based on work by landscape architects FPCR (Appendix B). FPCR were commissioned to undertake an Appraisal of the site known as 'Land at Wong Lane', to consider its contribution to the five Purposes of Green Belt, as set out in the NPPF, and to assess what the implications would be on the new Green Belt boundary should the site be removed from the Green Belt. This Appraisal provides a commentary on the Doncaster Green Belt Review (ARUP), and undertakes a 'sense check' of the published results, using professional judgement to reach conclusions on the suitability of this site for Green Belt release. The appraisal also provides a comparison between Sunderland Street and Land at Wong Lane, in terms of their contribution to the Green Belt Purposes, and the strength of the resultant Green Belt boundary (should these sites be removed from Green Belt) (SEE EMAIL FOR Appendix) Whilst ARUP conclude that both sites have moderate strength in terms of Purposes, it is important to acknowledge that Sunderland Street scores higher in terms of its contribution to the five Purposes of Green Belt. The combined scores for Sunderland Street are 20 (with 2 purposes scoring 4 or above), while the combined score for Wong Lane is only 14 (with 1 purpose scoring 4 or above). This also goes against the conclusion of the Stage 1 Assessment, in which General Area 'Tickhill 7' (in which Sunderland Street is located) scored significantly higher than 'Tickhill 2' (in which Land off Wong Lane' is located). Development of Land off Wong Lane would not result in extending the existing settlement further north or west than currently defined by the development limits (or settlement boundary). As such, the development of this site would not lead to a reduction in the gap between Tickhill-Stainton and Tickhill-Wadworth, and would not therefore contribute to coalescence of settlements. In contrast, the development of Sunderland Street would result in a 5.38% reduction in the gap between Tickhill and Harworth. In terms of Purpose 4 (preserving the setting and special character of historic towns), the contribution of Sunderland Street is slightly greater than Land off Wong Lane, given its proximity to Tickhill Castle, and potential for glimpsed views of the motte from the southern extent of the site. Overall, Sunderland Street performs better than Land at Wong Lane in terms of contribution to Purposes, and as such the latter should be considered first in terms of further site selection work. It is considered that the Local Plan's proposal to under-allocate sites in Tickhill and to "make good" through the allocated supply in other towns is not an effective policy choice. It does not ensure that the vitality of Tickhill is maintained (as required by NPPF paragraph 78) and risks undermining local services such as the primary school and shops in the Tickhill. Our client has the following sites in Tickhill which are suitable, available and achievable and should be allocated for housing as part of the Doncaster emerging Local Plan: 1. "Land off Wong Lane, Tickhill" - HELAA Site 357; 2. "Land off Lindrick Lane, Tickhill" - HELAA Site 356; We also support the future allocation of the following two sites for residential development in the village of Stainton: 1. "Land at Manor Farm, Stainton" - HELAA Site 359 2. "Land North of Limekiln Lane, Stainton" - HELAA Site 358 Details of these five site are set out below respectively and location plans identifying the sites can be found at Appendix A. (SEE EMAIL FOR Appendix) (NOTE THIS REP IS FOR SITE 1021 THE COMMENTS FOR THE OTHER SITES ARE INCLUDED UNDER THEIR REFNUMBER - SEE: 03568 / 03569)
6.22. Framecourt Homes is particularly concerned that in sufficient housing allocations are identified in Tickhill, which the proposed spatial distribution, Policy 3, suggests should be accommodating at least 165 new homes. There is presently a significant under provision in the settlement, which cannot be met through allocations in other settlements. Framecourt Homes proposes that their site at Apy Hill Lane, Tickhill (Site 1019) can accommodate part of that housing need. Framecourt Homes do not agree with the rejection of the site on access grounds and consider that this part brownfield site is deliverable and should be allocated, as summarised below. 6.23. Framecourt Homes maintains that the the Apy Hill Lane, Tickhill site 1019 should be considered and that it be identified as a mixed use housing and employment site. Technical studies are ongoing but initial assessments demonstrate the site's deliverability. 6.24. Framecourt Homes considers the proposed site is available, suitable and achievable and is therefore in accordance with the Framework a deliverable site able to come forward in the short term. 6.25. The deliverability and benefits of the Apy Hill Lane, Tickhill site is as follows: Overview of Proposals 6.26. The site is located on the edge of an established residential area and benefits from easy access to the full range of services and facilities located within Tickhill. Site location plan is show below and attached to these representations. The site is part brownfield and includes a current employment park. The proposed scheme would re-configure and upgrade the current industrial estate and provide new housing alongside. The site is approximately 3ha gross and could accommodate in the region of 60 new homes alongside a reconfigured and enhanced employment site, with a further 30 on land to the south as a later phase. (SEE EMAIL FOR Location Plan) Deliverability 6.27. The site at Apy Hill Lane provides a development opportunity that is available, suitable and achievable and therefore it is considered that the site is deliverable, in accordance with national planning policy and guidance. It is promoted by Framecourt Homes which further demonstrates the site's deliverability within the plan period. Availability 6.28. The land is being promoted by Framecourt Homes. The site is therefore available in accordance with the Framework and the National Planning Practice Guidance (PPG). 6.29. The proposed development can make an efficient and attractive use of the land. The site represents an excellent opportunity for future housing and development. This site allows housing to be delivered within an appropriate and sustainable location within Tickhill. Suitability 6.30. The site is located in a highly sustainable location and has residential development to the east and includes the remodelling and upgrading an existing industrial estate. The site is within easy walking distance to the centre of Tickhill with a range of facilities provided there, as well as greater facilities within Doncaster Town Centre, a bus ride away. There are a number of primary schools in the vicinity of the site. 6.31. The site is well served by buses providing opportunities for sustainable travel to work in Doncaster and beyond with access to Doncaster Railway Station. 6.32. The development will provide additional quality development that will benefit Tickhill and the wider district with economic, environmental and social benefits. It is therefore considered that the development is suitable. Green Belt 6.33. Due to the significant need and demand for housing and aspirations for economic and housing growth there is clearly a requirement for a strategic review of the approach to locations for future growth within the district. In order to plan for appropriate for the plan period there is a need to review the Green Belt boundaries. A thorough review of the development limits of Doncaster settlements would ensure a holistic approach to the location of development for the future of the Borough. 6.34. The housing needs of Doncaster are putting severe pressure on the local authority to review the Green Belt boundaries. To meet the housing requirement Doncaster Council recognises that some Green Belt land will need to be released for new housing land. Apy Hill Lane, Tickhill is a unique opportunity to positively use the Green Belt and meet the housing need for the area. 6.35. In the Borough of Doncaster approximately 46% of the area is designated as Green Belt. This is the western part of the Borough which forms part of the South Yorkshire Green Belt surrounding urban areas. 6.36. The Framework explains that there are five purposes of including land within the Green Belt, which is: 1. To check the unrestricted sprawl of large built up areas; 2. To prevent neighbouring towns merging into one another; 3. To assist in safeguarding the countryside from encroachment; 4. To preserve the setting and special character of historic towns; and 5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land. 6.37. Contextually, the site is “contained” by development and activity being part brownfield/employment site and adjacent to residential properties and lying adjacent to a railway line to the west. Within this context the release of the site from the Green Belt has limited impact on “openness” and that redevelopment of the site would have low impact on the purposes of including land within the Green Belt. 6.38. The Framework states that Green Belt boundaries should be drawn so as not to include land which it is unnecessary to keep permanently open. The site lies on the edge of Tickhill with residential development located to the east, a railway line to the west and includes an employment site. 6.39. The site is therefore "contained" and will not lead to unrestricted sprawl or encroachment. The site is located on the edge of Tickhill and is contained within its setting. The site would not therefore lead to the coalescence of towns. Whilst the development would result in development of some countryside the degree of encroachment into the countryside would be minimised. The site has no impact upon the setting of a historic town. 6.40. Framecourt Homes proposes that the new Green Belt boundary follows Apy Hill Lane and the railway line and northern boundary of the current employment site and tree belt which is clear and well defined. This boundary would accord with the Framework and ensure that the Green Belt is clearly defined using readily recognisable features to ensure permanency reinforcing the urban context whilst providing a robust boundary for the future. All the boundaries have the potential to be further reinforced within the site through additional planting to ensure an effective transition between the development and the countryside beyond. Achievable 6.41. A range of technical work is being undertaken and further survey work is ongoing. From the initial assessments there are no technical issues that would prevent development or are insurmountable. The site is therefore considered to be achievable and therefore deliverable in accordance with national guidance. The technical assessments will be submitted in due course and are
available upon request. Effective Use of Land 6.42. The site is part brownfield and will reconfigure and enhance the existing employment site alongside the delivery of much needed new housing on a currently under-utilised site. The proposed scheme will utilise and enhance existing infrastructure. The site is easily accessible and the proposed main access is off Apy Hill Lane. The scheme is therefore making an efficient and effective use of land and infrastructure. Delivering a Flexible Supply of Housing 6.43. The Framework requires Local Planning Authorities to meet their full objectively assessed housing need. Framecourt Homes considers that the site at Apy Hill Lane, Tickhill is deliverable in the short term and will reinforce the housing supply and address the Borough’s housing needs in the early years of the Local Plan. The site is fully capable of being delivered in the next 5 years. A Positive Response to the Key Objectives of the Framework 6.44. The Framework sets out that the Government’s key housing policy goal of boosting significantly the supply of housing and proactively driving and supporting sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs. The Framework explains that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as extensions to towns, and creating mixed and sustainable communities with good access to jobs, key services and infrastructure. Sites should also make effective use of land and existing infrastructure. 6.45. In relation to the Framework: - The proposal responds positively towards national guidance. - The site is appropriate for accommodating housing growth, being an expansion of an existing settlement. - The proposed site is accessible to existing local community facilities, infrastructure and services, including public transport. - The site has been assessed and is available, suitable and achievable for development. Benefits of Apy Hill Lane, Tickhill 6.46. The development of the site would provide significant benefits. The site would provide housing that would meet the needs of the Tickhill and Doncaster Borough housing market. Therefore this site provides a unique opportunity in a sustainable location. 6.47. In accordance with the Framework this representation has shown that: - The site is suitable for housing and can deliver circa 60 new homes. - The proposal will reconfigure and update the existing employment site. - The proposal will deliver high quality housing. - The proposal will deliver affordable housing. - The proposal can provide a good mix of housing commensurate to the demand and need in the area. - The scheme uses land efficiently and effectively. - The proposal is in line with planning for housing objectives. - The site is within a sustainable location situated in close proximity to facilities and services and also to bus stops for local bus routes. - The scheme will create direct and indirect job opportunities both during and after construction. 6.48. The proposal is an appropriate site to provide for the housing needs of Tickhill and Doncaster in the short term. The allocation of the site would confirm its potential to help continue the provision of a balanced housing supply in the Borough in sustainable locations. The site can deliver a full range and mix of housing and a sustainable community. Development of the site would deliver housing and affordable housing. Doncaster needs to have a robust housing trajectory and the site Apy Hill Lane, Tickhill would assist with this delivery in the short term. The site is part brownfield and is situated within a prime location suitable for residential and employment development and as such would facilitate the development of land in a more effective and efficient manner. Development of the site would not harm or undermine the areas wider policy objectives, but seeks to reinforce the need to develop sites within sustainable locations as a priority. 6.49. The site is available, suitable and achievable and therefore deliverable in accordance with the Framework. Proposed Change 6.50. To overcome the objection and address soundness matters, the Council should 6.51. Framecourt Homes consider that the following sites should be deleted or the yield within the plan period should be significantly reduced: - Site 1028 6.52. To address the identified deficiencies in the Plan Framecourt Homes therefore suggest that the following sites be allocated: - Site 1019: Apy Hill Lane, Tickhill

Summary:

Concerned that insufficient housing has been identified in Tickhill, which should have 165 new homes. There is under provision at present that cannot be met elsewhere. Site 1019 can accommodate the housing need; do not agree with rejection on access grounds and consider this is part brownfield and deliverable and should be allocated as a mixed use housing and employment site. Site is available, suitable and achievable and in accordance with the framework. The site is on the edge of an established residential area and has easy access to a full range of services and facilities in Tickhill. Site is part brownfield and includes a current employment park. The new scheme would reconfigure and upgrade the current industrial estate and provide new housing alongside it. It is 3ha and could accommodate about 60 new homes plus a reconfigured enhanced employment site, plus 30 more houses on land to the south in a later phase. The site is available, suitable and achievable and considered deliverable. It is promoted by Framecourt Homes and is therefore in accordance with the NPPF and PPG. The development can make efficient and attractive use of the land and has an excellent opportunity for future housing and development. It allows housing in a more appropriate and sustainable location in Tickhill. It is in a highly sustainable location with residential development to the east and is in easy walking distance of Tickhill and it’s facilities as well as greater facilities within Doncaster Town Centre - a bus ride away. There are a number of primary schools in the vicinity of the site. The site is well served by buses providing opportunities for sustainable travel to Doncaster and beyond with Doncaster railway station. It will provide additional quality development to Tickhill. There is clearly a requirement for a strategic review of the locations for future growth and in order to plan appropriately in the plan period there is a need to review Green Belt boundaries. The Council have recognised this and site 1019 provides a unique opportunity to positively use the Green Belt and meet local housing needs. The site is constrained by development and activity being part brownfield / part employment and adjacent to residential properties and lying adjacent to the railway to the west. There would be limited impact on openness and redevelopment would have low impact on purposes of land in the Green Belt. The site is contained and will not lead to encroachment or unrestricted sprawl. It is on the edge of Tickhill and contained within this setting. There would be some loss of countryside but the degree of encroachment would be minimised. There would be no impact on the historic setting. The new Green Belt boundary should be along Apy Hill Lane and the railway line to the northern boundary of the site and the well-defined tree belt. The features would be clearly defined using recognisable features to ensure permanency. All boundaries could be further enforced and provide an effective transition between the development and the countryside beyond. A range of technical survey work is ongoing with the site. Initial work suggests there are no technical issues to prevent development that are insurmountable. Assessments will be submitted in due course or available on request. The site will utilise existing infrastructure and is easily accessible via the proposed access off Apy Hill Lane. The scheme makes efficient and effective use of land and infrastructure. The site can be delivered within 5 years. In relation to the Framework: - The proposal responds positively towards national guidance. - The site is appropriate for accommodating housing growth, being an expansion of an existing settlement. - The proposed site is accessible to existing local community facilities, infrastructure and services, including public transport. - The site has been assessed and is available, suitable and achievable for development. There will be significant benefits, including meeting local and borough wide housing needs and meeting the needs of the housing market. In accordance with the Framework this representation has shown that: - The site is suitable for housing and can deliver circa 60 new homes. - The proposal will reconfigure and update the existing employment site. - The proposal will deliver high quality housing. - The proposal will deliver affordable housing. - The proposal can provide a good mix of housing commensurate to the demand and need in the area. - The scheme uses land efficiently and effectively. - The proposal is in line with planning for housing objectives. - The site is within a sustainable location situated in close proximity to facilities and services and also to bus stops for local bus routes. - The scheme will create direct and indirect job opportunities both during and after construction. The proposal can bring housing in a sustainable location and deliver a full range and mix of housing and a sustainable community. It would bring affordable housing. The site would help the trajectory in the short term. The site is part brownfield and in a prime location suitable for residential and employment development and
would use the land in a more efficient manner. It would not undermine the areas wider policy objectives but seeks to reinforce the need to develop sites in sustainable locations as a priority. Proposed change - to overcome the objection and address soundness issues, the Council should delete or reduce the yield of site 1028 and allocate site 1019.

Response:

Whilst there is an under delivery against the target of 165 at Tickhill, this is due to the lack of viable alternatives. Sites have been discounted for a number of reasons, including access issues (given the rural nature of the settlement) and Green Belt. In the case of site 1019, the site is deemed to impact too much on the Green Belt, and furthermore there are significant access issues to the site. This is expanded on in the Site Selection Methodology and Green Belt Review / Topic Paper. Overall, the shortfall is made up in other settlements.
6.1. Framecourt Homes objects to Policy 6 and the proposed distribution of housing and that the following site is not a proposed allocation: - Site 1019: Apy Hill Lane, Tickhill 6.2. The site is summarised below and technical information and advocacy report has been submitted previously. Test of Soundness 6.3. Framecourt Homes considers that the Local Plan is currently unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 6.4. Framecourt Homes is concerned that the Local Plan is not producing sufficient homes across the Borough. Further to comments in relation to Policy 3 Framecourt Homes recommends that further sites are identified to meet and exceed the requirement but also to provide a sufficient buffer to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the Framework requirements for the plan to be positively prepared and flexible. 6.5. Framecourt Homes is concerned that the proposed distribution of new homes does not reflect the spatial strategy, but importantly does not address the focus for economic and housing growth across the Sheffield City Region and Yorkshire and Humber as a whole. 6.6. The proposed distribution against the Council's own targets shows a deficiency and a significant under provision in: – Doncaster – Adwick- Conisbrough - Denaby - Mexborough - Thorne - Moorends - Sprotbrough - Tickhill - Bawtry 6.7. Framecourt Homes, as explained in response to Policy 2 and the spatial strategy considers that the spatial strategy is incorrect, that it does not provide for the growth of the Borough and does not reflect the role, function and location of the settlements. 6.8. Framecourt Homes, as explained in response to Policy 2 and 3, considers that there needs to be further provision of housing and a slightly amended approach to the spatial strategy, which focusses growth towards Doncaster. There should be further growth of Rossington to address regeneration and the provision of new infrastructure. There should be growth in Thorne-Moorends, and a regeneration focus in Carcroft-Skellow which should elevate the status of the settlement commensurate to its role and function. New housing should be provided in Tickhill to address the current under provision. 6.9. Framecourt Homes is particularly concerned that insufficient housing allocations are identified in Tickhill, which proposed spatial distribution in Policy 3 suggests should be accommodating at least 165 new homes. There is presently a significant under provision in the settlement, which cannot be met through allocations in other settlements. The current level of allocation of 74 units at Site 1028, does not reflect the role, and function of the settlement. Framecourt Homes proposes that their site at Apy Hill Lane (site 1019) can accommodate part of that housing need. 6.10. Further Framecourt Homes are concerned about the deliverability of a number of allocations within the main urban areas. These include but are not limited to the following sites: 6.11. Framecourt Homes object to the allocation of site 1028. The site does not have access and is not deliverable in the short term. Overcoming this constraint will have viability implications. It is a 1.5 ha site which has been identified as having a capacity of 74 dwellings. This is clearly based on unrealistic net developable area, and or density. It is a greenfield site, and priority should be given to the allocation of brownfield sites such as Site 1019. The site should not be allocated or as a minimum the forecast contribution to the local plan should be reduced to reflect more realistic density and net to gross ratios. 6.12. Based on the above it is clear that the deliverability and delivery rates of some of the sites in Doncaster ought to be reviewed to ensure that they reflect the site specific circumstances. Further allocations are required in Tickhill to ensure that the Plans strategy can be delivered and the identified needs of Tickhill can be met in full. 6.13. Therefore, Framecourt Homes consider their part brownfield site to the west of Tickhill (Site 1019), should be allocated to address the housing shortfall in the settlement. 6.14. As indicated in response to Policy 2 Framecourt Homes are also concerned that the Plan does not provide sufficient support for development in Defined Villages. Framecourt Homes consider that in line with the provision of the Framework, paragraph 78, which is clear that to promote sustainable development in rural areas, ‘Housing should be located where it will enhance or maintain the vitality of rural communities. Planning Policies should identify opportunities for villages to grow and thrive, especially where this will support local services’. 6.15. Furthermore, there does not appear to be any safeguarded sites identified within the Local Plan. This is concerning given Policy 6 states that the Plan will designated Reserve Development Sites, yet those identified are not considered to be developable within the Plan Period due to significant constraints relating to flood risk and HS 2 Safeguarding, thus could not be relied on to maintain the supply of housing should other sites fail to deliver in the Plan period. As indicated in response to Policy 3 Framecourt Homes suggest, that safeguarded sites be proposed, to provide additional flexibility in accordance with national guidance. 6.16. Framecourt Homes consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Doncaster Local Plan in its current form to be sound. 6.17. However, Framecourt Homes consider that with the proposed allocation of Site 1019, Apy Lane, Tickhill and the deletion or adjustment in anticipated delivery within the plan period of sites 1028 that the Local Plan can be found sound. Framecourt Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 6.18. To overcome the objection and address soundness matters, the Council should 6.19. Framecourt Homes consider that the following sites should be deleted or the yield within the plan period should be significantly reduced: - Site 1028 6.20. To address the identified deficiencies in the Plan Framecourt Homes therefore suggest that the following sites be allocated: - Site 1019: Apy Hill Lane, Tickhill 6.21. A short summary of this site is in the following sub-section and detailed representations including an Advocacy has been admitted alongside previous representations.
Summary:
Object to Policy 6 and the proposed housing distribution, and that site 1019 is not proposed for allocation. The plan is currently unsound. Concerned that the plan is not producing sufficient homes across the borough. Further sites are needed to meet and exceed the requirement and also provide a buffer for under-delivery which is likely on some sites. Concerned that the proposed distribution does not reflect the spatial strategy, but importantly does not address the focus for economic and housing growth across the Sheffield City Region and Yorkshire and Humber as a whole. There is a deficiency of homes against council targets in: - Doncaster - Adwick - Conisbrough - Denaby - Mexborough - Thorne - Moorends - Sprotbrough - Tickhill - Bawtry There needs to be further provision of housing and a slightly amended approach to the spatial strategy, which focusses growth towards Doncaster. There should be further growth of Rossington to address regeneration and the provision of new infrastructure. There should be growth in Thorne-Moorends, and a regeneration focus in Carcroft-Skellow which should elevate the status of the settlement commensurate to its role and function. New housing should be provided in Tickhill to address the current under provision. The allocated 74 homes in Tickhill is not enough and site 1019 can accommodate part of the housing need. Object to site 1028 being allocated. Does not have access and is not deliverable in the short term. Overcoming the constraint will have viability implications. It is 1.5ha and is earmarked for 74 dwellings. This is based on an unrealistic net developable area and / or density. It is greenfield when priority should be given to brownfield such as site 1019. 1028 should not be allocated or as a minimum the forecast contribution to the Local Plan should be reduced to reflect a more realistic density and net to gross ratios. Based on the above it is clear that the deliverability and delivery rates of some of the sites in Doncaster ought to be reviewed to ensure that they reflect the site specific circumstances. Further allocations are required in Tickhill to ensure that the Plans strategy can be delivered and the identified needs of Tickhill can be met in full. The part brownfield site 1019 should be allocated to address the housing shortfall in the area. Also concerned that the plan does not provide sufficient support for development in Defined Villages in line with NPPF para. 78, which is clear that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities and identify opportunities for villages to grow and thrive, especially where they will support local services. There are also no safeguarded sites in the plan - sites should be proposed. The policy as drafted is not justified or consistent with the framework and the plan could fail to deliver sustainable development in accordance with the framework. As such, do not consider this to be sound. With the allocation of site 1019 and the adjustment or deletion of anticipated delivery within the plan period for site 1028, the Local Plan can be found sound. Proposed change: to overcome the objection and address soundness matters, the Council should - delete site 1028 or reduce the yield significantly - allocate site 1019

Response:
Whilst there is an under delivery against the target of 165 at Tickhill, this is due to the lack of viable alternatives. Sites have been discounted for a number of reasons, including access issues (given the rural nature of the settlement) and Green Belt. In the case of site 1019, the site is deemed to impact too much on the Green Belt, and furthermore there are significant access issues to the site. This is expanded on in the Site Selection Methodology and Green Belt Review / Topic Paper. Overall, the shortfall is made up in other settlements. Aside from Mexborough, the Main Urban Area and all the Main Towns mentioned are only short against the top of their ranges. As the Housing Topic Paper explains, not all of these settlements need to meet the top of their range, as long as the overall number balances out at approx. 90% of housing in these two areas, which it does. In Bawtry and Sprotbrough the shortfall against the target is relatively small and in Tickhill there are no other suitable sites, aside from 1028 (where access issues can be overcome). However, overall the borough is delivering enough housing across the plan period, and shortfalls are made up for in other areas. Note that Table HQ (2) has a lower site size that the actual size of the site, this has been amended which will address points raised about the yield.
5.1 Policy 3 identifies that just 165 dwellings should be provided within Tickhill. Given our comments upon the housing requirement and distribution, above, this is not considered a sound approach. This is further compounded by the Local Plan identifying just one allocation for 74 dwellings. The Local Plan identifies that; “The remainder of the settlement's housing requirement of 165 new dwellings (91 units) has therefore been made good through allocated supply at the Doncaster Main Urban Area and some of the Main Towns in line with Policy 3, which adds any unmet local housing need from settlements to the economic-led housing growth uplift” (para. 16.237) 5.2 There is a clear need for development within Tickhill the Council's approach to simply redistributing this need to the Main Urban Area is not considered appropriate. 5.3 Whilst we do not object to the inclusion of the allocation in Tickhill (Site Ref: 1028, Sunderland Street / Sunderland Farm Close, Tickhill) we do question whether it will deliver the 74 dwellings envisaged. Our concerns arise from the proximity of the site to the A1(M). As noted in the Local Plan site assessment (page 302) this will inevitably require significant noise attenuation measures, we also suggest consideration of air quality could be a factor. Given these issues the developable area is likely to be reduced and hence the quantum of new dwellings will be affected. 5.4 Our previous representation was accompanied by a Site Promotion document which explains why Paper Mill Fields (Site 824) represents a suitable location for new homes in accordance with the strategic draft policy targeting growth to the settlement of Tickhill. It also illustrates how development could be achieved on the site in a well-designed manner, responding to site conditions and local characteristics, including heritage setting considerations. 5.5 The Green Belt assessment identifies that exceptional circumstances for the release of Green Belt are justified across Doncaster. Given the lack of housing proposed in Tickhill and the lack of suitable alternatives we are strongly of the opinion that Land at Paper Mill Fields should be allocated to meet the housing needs of Tickhill.
Comment:

UKOOG Response: Coal Bed Methane (CBM): There is no specific reference or policy covering CBM within the Draft Plan. CBM is a form of natural gas extracted from coal beds comprising of methane absorbed into the solid matrix of the coal. Reference should be made in a revised section of Policy 65 and it’s supporting text for completeness. Coal Mine Methane: There is no specific reference or policy covering Coal Mine Methane within the Draft Plan. The Glossary states: ‘Gas collected from operating mines and used as an energy source’. This definition should be re-worded along the lines of: ‘Methane gathered from operating or decommissioned coal workings, which is used as an energy source rather than being cold vented to the atmosphere.’ Conventional Hydrocarbons: The Glossary states: ‘Oil and gas found within geological ‘reservoirs’ with relatively high porosity/permeability, extracted using conventional drilling and production techniques.’ The term ‘conventional’ refers to the geology in which the hydrocarbons are located, specifically those oil and gas resources contained within higher porosity/permeability reservoirs. ‘Conventional’ does not refer to the techniques used to extract the resource. Unconventional Hydrocarbons: The Glossary states: ‘Hydrocarbons such as coal bed and coal mine methane and shale gas, extracted using unconventional techniques, including hydraulic fracturing in the case of shale gas, as well as the exploitation of in situ coal seams through underground coal gasification.’ The term Unconventional refers to the geology in which the hydrocarbons are located. Specifically, those rocks in which the hydrocarbons are bonded within the structure of the geology, such as source rocks like Shale, where oil and gas extraction requires some form of treatment to the rocks to create pathways for the hydrocarbons to flow out. ‘Unconventional’ does not refer to the techniques used to extract the resource. Coal Mine Methane (CMM) is not considered an unconventional source, as the methane is gathered from within the workings of a mine, as the gas migrates from the coals surface into the worked areas. Therefore, CMM should be excluded from this definition. We suggest that the Council also refers to definitions provided by the Oil and Gas Authority; https://www.ogauthority.co.uk/site-tools/glossary-of-terms/  

Summary:

Appendix 1 Glossary. Comment? No policy or reference made to other energy minerals, such as coal or mine methane, except for a short statement on paragraph 14.76. Policy 65 should include text on Mine Methane and Coal. Amend glossary wording for conventional and unconventional hydrocarbons.

Response:

Comment noted. No proposed changes to policy 65 and supporting text. Amendments proposed to glossary with regard to energy minerals such as mine methane, conventional and unconventional hydrocarbons to clarify definitions.
IGas has the following comments in respect of the Glossary and definitions:

**Coal Bed Methane (CBM):** This abbreviation/term is included in the Glossary but there is no reference or policy for such in the Draft Plan. Whilst there are a number of definitions, coal be methane is a form of natural gas extracted from coal beds comprising of methane absorbed into the solid matrix of the coal. Reference should be made to such in Policy 65.  

**Coal Mine Methane:** This abbreviation/term is included in the Glossary but there is no reference or policy for such in the Draft Plan. Irrespective, it is considered the definition should include the term methane, rather than gas and be amended to 'Methane gathered from operating or decommissioned coal workings, which is used as an energy source rather than being cold vented to the atmosphere.' Reference should be made to such in Policy 65.  

**Conventional Hydrocarbons and Unconventional Hydrocarbons:** Conventional hydrocarbon is an individual hydrocarbon accumulation in a single trap with a uniform pressure system and oil and water contact. It is extracted using drilling and production methods many of which are common to the winning of 'unconventional' hydrocarbons. Unconventional Hydrocarbons are hydrocarbons that in some cases the oil and gas become trapped within shale rock itself and form traditional conventional reservoirs. Given such oil and gas may be found at considerably greater depths than conventional oil and gas, or is easily penetrated by liquids or gases, it requires a lot more effort to extract the hydrocarbons. Hydraulic fracturing is a method used to stimulate oil or gas either to begin or continue flowing and is employed to extract conventional and unconventional oil and gas to help improve the flow rates. The techniques employed to extract both are very similar other than in scale and perhaps frequency. Consequently it is considered a single definition for hydrocarbons would be sufficient; if not then the definition of unconventional hydrocarbons should be amended to exclude 'unconventional techniques' given the above. It is suggested the definitions provided by the Oil and Gas Authority should be used; [https://www.ogauthority.co.uk/site-tools/glossary-of-terms/](https://www.ogauthority.co.uk/site-tools/glossary-of-terms/)

**Summary:**
Hydrocarbon definitions in glossary should reflect those provided by oil and gas authority. Glossary references CBM and CMM, but not in policy or text justification

**Response:**
Comments noted. Amend glossary terms for conventional and unconventional hydrocarbons. Para 14.76 discusses other minerals such as peat and coal, but does not mention coal derivatives such as CBM /CMM. No proposed changes. It is not politically acceptable to make changes to policy 65 and supporting text.
Comment Ref: Appendix 2 Dev Guideline/03259/3/011

Attend Examination: Attend Hearing

Reason: We act for a number of major land owners in the Doncaster area, we have detailed knowledge of the sites and the planning history of the Borough. We have previously been involved with the Core Strategy Plan and with the Examination of the draft Sites and Policies DPD. Our knowledge of the various land parcels, ownerships, the strategic land position and site specific details, means that we have information to inform the debate regarding the overall housing requirement and the specific allocation of sites which will assist the examination.

Area: Appendix 2: Developer Requirements

Policy: Appendix 2: Developer Requirements

Tests of Soundness: Positively prepared Effective Legally Compliant

Justified Consistent with national

Comment:

Objection is made to the developer guidelines as set out on pages 272 and 273, the design comments are over prescriptive at this stage and may inhibit the development of the most appropriate layout of the site when the detailed site details have been established. The guidelines do not explain why an education contribution will be required and which schools this would benefit.

Summary:

Objects to developer requirements as too prescriptive and may inhibit most appropriate layout of site when detail is known and does not explain why a school contribution is required and for which school.

Response:

The requirements are not considered overly prescriptive for this stage of the plan-making process and are set out to inform early considerations of appropriate design and layout to assist with applicants submitted successful applications in due course. Sites have been assessed by colleagues in Education to determine where there are likely to be a need for contributions to increase capacity. A standard Department for Education formula is used.
We act for a number of major land owners in the Doncaster area, we have detailed knowledge of the sites and the planning history of the Borough. We have previously been involved with the Core Strategy Plan and with the Examination of the draft Sites and Policies DPD. Our knowledge of the various land parcels, ownerships, the strategic land position and site specific details, means that we have information to inform the debate regarding the overall housing requirement and the specific allocation of sites which will assist the examination.

Objects to developer requirements as the design comments are too prescriptive and may inhibit the development of the most appropriate layout of the site when such details have been established. The guidelines do not explain why an education contribution will be required and which schools this would benefit. PROPOSED CHANGE 7. Amend the developer guidelines to be flexible and justified. As explained in detail above.

The requirements are not considered overly prescriptive for this stage of the plan-making process and are set out to inform early considerations of appropriate design and layout to assist with applicants submitted successful applications in due course. Sites have been assessed by colleagues in Education to determine where there are likely to be a need for contributions to increase capacity. A standard Department for Education formula is used.
In summary, the existing development requirements do not adequately explain the Site and its characteristics. Further, full and proper consideration of the Site (including assessment against their own policies set out in the Local Plan) would have led DMBC to assess the Site as unsuitable for development. Quote: Archaeology: This site has a high potential for the survival of significant archaeological remains associated with Roman period pottery production and associated settlement, agriculture and pottery production. Given this evidence, further consideration of the impact on these will be required to establish the site’s capacity for development. A programme of archaeological evaluation (expected to be a combination of geophysical survey and trial trenching) will need to be discussed and agreed with the South Yorkshire Archaeology Service at an early stage. It will be key that this evaluation is completed at the design stage. The evaluation will characterise the nature, extent and state of preservation of the archaeological remains present on the site and provide information to ensure the design minimises any impact upon significant archaeological areas. A Heritage Statement detailing how the results of the evaluation have informed the design of the scheme can then be submitted alongside any planning application. This Heritage Strategy will also detail the proposed mitigation measures where less significant archaeological evidence will be impacted by the proposed scheme. The proposed mitigation will be designed to ensure that an understanding of the archaeological evidence affected is gained before that evidence is lost or damaged. Comments: This assessment should be performed prior to any permission being given for development starting. It is clear that as well as being a rich biologically diverse site and its value to the local community as a Green Open Space, the Site may well also have archaeological significance. Given this, there should be no question of the Site being developed. Quote: Biodiversity: The woodland / Local Wildlife Site to the northern part of the site should be protected with a buffer zone of planting. Similarly the corridor along the railway line could be enhanced with additional planting. The site has biodiversity value and forms part of a wider network of connected and biodiverse greenspaces. Habitat losses would need to be accounted for and would require compensation, which should contribute to the quality of the ecological network. This could potentially be delivered via a biodiversity net gain approach, subject to assessment of the habitats being lost and availability of suitable receptor sites. Comments: I agree that the site has "biodiversity value and forms part of a wider network of connected and biodiverse greenspaces." It is unclear how the development and complete destruction of this rich ecological and irreplaceable environment is in accordance with the stated policies in the Local Plan to “protect open spaces which provide important opportunities for formal and informal recreation as well as those which provide a social, cultural and ecological role” (Policy 28). Further, it is unclear why this site was not identified as a Local Green Space and why the development proposals were not therefore considered in accordance with national and local policy and guidance. No explanation is given as to how practically "habitat losses would need to be accounted for and would require compensation, which should contribute to the quality of the ecological network." The habitat on the site is irreplaceable and once gone, cannot be restored to the ecological network. It is totally unrealistic to destroy this site and then compensate for the habitat loss via a "biodiversity net gain approach, subject to assessment of the habitats being lost and availability of suitable receptor sites". No explanation is given as to how it is at all feasible for there to be a "biodiversity net gain" from destroying the Site (which is adjacent to a LNR/SSSI and part of a Green Infrastructure corridor) and from how this "biodiversity net gain" will be achieved. Should development on the site be potentially permitted, a detailed explanation of how the specified criteria will be achieved should be provided and independently reviewed prior to any development starting: this should be an absolute requirement of any development. In addition, prior to any permission to develop the Site is granted, a detailed wildlife assessment of the Site should be performed to assess whether the Site is home to endangered or protected flora and fauna. Given the rich eco-diversity of the site and its location next to a LNR/SSSI, and the number of birds and animals living on the site, together with a host of wildflowers, it is highly likely that endangered or protected species are resident on the Site. In this regard, it should be noted that the Site is home to [protected species] which are a protected species APPENDIX 2 OF THE PLAN SHOULD EITHER BE UPDATED TO REFLECT THE ABOVE AS REQUIREMENTS PRIOR TO PERMISSION BEING GRANTED TO DEVELOP THE SITE, OR PREFERABLY THE SITE SHOULD BE REMOVED FROM APPENDIX 2 AND DESIGNATED A PROTECTED OPEN GREEN SPACE. Quote: The site is potentially accessed through the existing Rose Hill Rise and The Avenue cul-de-sacs. A Transport Assessment & Travel Plan will be required. Section 6.6 of the disposal brief states that the concentration of outbound traffic at peak times is likely to result in excessive queuing on Rose Hill and potential unacceptable queuing and delays for motorists. The Transport Assessment will assess the operational capacity of the network and identify any measures required to mitigate against this. A residential travel plan will be required, and a routing agreement may be required during construction. Comments: The existing development adjacent to the site comprises around 180 dwellings. The access to the Site is via this development with only one exit, and two access roads in (due to one access road being one way). The existing road system will be totally unable to cope with an additional 166 dwellings, thereby effectively doubling the size of the development serviced by these roads. Given the location of the site (bounded on the other 3 sides by the Racecourse, a LNR/SSSI and a railway line/other development with no access roads), the roads in the Rose Hill Rise and the Avenue cul-de-sac are the only possible routes into and out of the Site. There is no conceivable way that the operational capacity of the roads can be increased and any mitigation of the significant increase in traffic, pollution and noise achieved. Development should not be permitted on this basis alone. Further, development of the Site (which will take years) will cause significant loss of amenity, disruption, noise and unacceptable detriment to the existing community (many of whom are elderly and value the tranquility of the existing development and its location) over a period of 5–10 years, the proposed timescale of the development. No residential travel plan or...
APPENDIX 2 OF THE PLAN SHOULD EITHER BE UPDATED TO REMOVE THE SITE FROM THE LOCAL PLAN DUE TO THE SIGNIFICANT ISSUES WITH ACCESS AND ROAD INFRASTRUCTURE AND THE SITE SHOULD BE REMOVED FROM APPENDIX 2 AND DESIGNATED A PROTECTED OPEN GREEN SPACE. Quote: The existing site boundaries include mixed species hedgerows with numerous mature trees within them. It will be a requirement of the development that these hedgerows and trees are retained and enhanced through additional and appropriate planting. Boundary oaks should be designed in as per the design brief. Layout should be informed by a tree survey. Comments: The Site itself (not just the boundaries) include numerous trees, shrubs and other flora which should be considered in the assessment. APPENDIX 2 OF THE PLAN SHOULD EITHER BE UPDATED TO REFLECT THE ABOVE, OR PREFERABLY THE SITE SHOULD BE REMOVED FROM APPENDIX 2 AND DESIGNATED A PROTECTED OPEN GREEN SPACE. Comments on Appendix 2 of the Doncaster 5-Year Deliverable Housing Land Supply Statement referring to Site 350/407 Rosehill/ The Avenue, Cantley In reference to the Site, it is stated that "No constraints or provision of any significant new infrastructure required". This is demonstrably incorrect. There are in fact significant constraints on the site as evidenced by the comments in Appendix 2 of the Doncaster Local Plan referred to above. As noted earlier, there is no conceivable way that the operational capacity of the roads can be increased and any mitigation of the significant increase in traffic, pollution and noise achieved. Further, significant new infrastructure will be required in order to deliver services such as drainage, electricity and gas, etc to any new development on the Site. The Site is not therefore a deliverable site as defined in this document.

Response:

These comments relate to objection of the site being proposed as an allocation as opposed to the developer requirements. See response to other Representations as well as the Site Selection report for reasons why the site is proposed to be re-allocated for housing.
Comment Ref: /Appendix 2/05187/1/009

Attend Examination: Attend Hearing

Reason: We act for a number of major land owners in the Doncaster area, we have detailed knowledge of the sites and the planning history of the Borough. We have previously been involved with the Core Strategy Plan and with the Examination of the draft Sites and Policies DPD. Our knowledge of the various land parcels, ownerships, the strategic land position and site specific details, means that we have information to inform the debate regarding the overall housing requirement and the specific allocation of sites which will assist the examination.

Area: Appendix 2: Developer Requirements

Policy: Appendix 2: Developer Requirements

Tests of Soundness: Positively prepared Justified Effective Consistent with national Legally Compliant

Comment:

Pages 268-269. We object to the site development guidelines as drafted, the plan included on page 268 showing site 147 has been reduced in size from the draft plan and should be amended to the original site area of 11.65 hectares. There is no explanation of why an education contribution will required or which schools this would benefit. We object to the comments about flood zone 3. Our flood risk surveys indicate that based on the site topography the area of flood zone 3 is less than indicated on the supporting maps and plans. The narrowing of the site is in direct conflict with the objective set out in the developer guidelines to have development that fronts onto Hatfield lane and also the open countryside. The narrowness of the site as now drafted will limit the layout and the scope to achieve this objective. PROPOSED CHANGE 8. Amend the developer guidelines to be flexible and justified. As explained in detail above.

Summary:

Objects to the reduced site area as shown on the developer requirements plan and should be amended to the original extent. No explanation for education contribution (why needed and for which school?). Object to comments in respect to flood zone as the technical work shows the area of flood zone 3 is less than indicated by the EA Flood Map for Planning. The reduction of the site is in conflict with the objective set out in the requirements to have development fronting onto Hatfield Lane and also the open countryside as narrowing the site limits the layout and scope to achieve this objective.

Response:

The reasons for the reduced site area are set out in the Site Selection report. Colleagues in Education have assessed the capacity of schools and identified sites where contributions are likely to be required to increase capacity. They use a standard formula based on the Department of Education best practice.
### Comment Ref:
C/Appendix 11/05014/1/017

### Location:
- **Area:** Appendix 11: Noise
- **Policy:** Appendix 11: Noise

### Tests of Soundness:

### Comment:
The intentions of Policy 55 and Appendix 11 are supported, as they align with national policy and planning practice guidance. However, no provision is made for temporary uses or for short term operations, which would apply in the context of onshore oil and gas exploration and appraisal stages. As minerals can only be worked where they occur, and their extraction may generate noise over a temporary period, provision should be made for temporary impacts to be considered.

### Summary:
Appendix 11 noise. Intentions of policy 55 and appendix 11 are supported, but no provision is made for temporary uses or for short term operations, such as oil and gas exploration, appraisal and extraction.

### Response:
Comment noted. The policy and appendices are not just aimed at hydrocarbon development proposals. Where required Planning and Pollution Control will work with and liaise with the EA and relevant bodies to determine applications as required by NPPF / NPPG. The plan should also be read as a whole.
The intentions of Policy 55 and Appendix 11 are supported. However, no provision is made for temporary uses or for short term operations that may be noisy. This can typically be the case for mineral operations. Minerals can only be worked where they occur and may generate noise over a temporary period and over a short duration. Provision should be made for temporary impacts to be considered.

Summary:
The intentions of Policy 55 and Appendix 11 are supported. no provision for temporary uses

Response:
Comment noted. Policy relates to other forms of development not just minerals. Local Plan should be read as a whole. Para 14.33 identifies mineral extractions temporary
Appendix 12 - gives details of monitoring, but throughout the chapter and the appendix, there is little mention of planning enforcement. There are only 4 references which are very specific: one in the context of gypsy sites and this mentions 'sites which are immune from enforcement' (footnote to Table 6 on p64); one in Chapter 7, fig 7, which outlines the enforcement process in 'Transport Assessment of Planning Applications'; one in the context of HMO's where it states that 'the Council will utilise all its powers available including licensing and enforcement .... to ensure that our communities are not negatively impacted by the provision of such accommodation' (policy 10, paragraph F on p60) and one in the context of extraction of minerals where it states 'that there is a requirement for routine monitoring and if necessary enforcement to ensure conditions that mitigate impacts are complied with' (minerals policy paragraph 14.33 on p166). It is not at all clear why only these 4 specific areas have been selected for enforcement action policy. In order to have an effective Local Plan there must surely be a clear and unambiguous policy for enforcement across the board to deal with all transgressions in planning - whether unauthorised developments or non-compliance with authorised developments and their conditions. To have an effective plan, the Local Plan must be monitored and controlled and this must involve policing and enforcement of developments to ensure objectives are met. The current approach by DMBC to enforcement is haphazard and lacks any clarity and consequently this leads to confusion and abuse. The opportunity should be taken now to put forward a clear and unambiguous enforcement policy as a key part of the Local Plan. While much of the Local Plan appears to meet most of the requirements of 'soundness', in so far as the JRP can judge on the evidence provided, it can only be effective if there are robust monitoring and enforcement measures.

Summary:
Appendix 12 gives details of monitoring, but throughout the chapter and the appendix, there is little mention of planning enforcement. There are only 4 references which are very specific (details provided) and it is not at all clear why only these 4 specific areas have been selected for enforcement action policy. In order to have an effective Local Plan there must surely be a clear and unambiguous policy for enforcement across the board to deal with all transgressions in planning - whether unauthorised developments or non-compliance with authorised developments and their conditions. To have an effective plan, the Local Plan must be monitored and controlled and this must involve policing and enforcement of developments to ensure objectives are met. The current approach by DMBC to enforcement is haphazard and lacks any clarity and consequently this leads to confusion and abuse. The opportunity should be taken now to put forward a clear and unambiguous enforcement policy as a key part of the Local Plan. While much of the Local Plan appears to meet most of the requirements of 'soundness', in so far as the JRP can judge on the evidence provided, it can only be effective if there are robust monitoring and enforcement measures.

Response:
DMBC will always investigate any alleged breach reported to us and make a reasoned decision whether it merits action. However, because of the legal test of "expediency" we should only take formal enforcement action where it is fair and reasonable to do so. In making this decision we will assess the circumstances of the case and make reference to our adopted planning policies. In addition we must also consider Central Government enforcement policy and guidance. DMBC has its own separate Enforcement Policy which is available to view here: https://www.doncaster.gov.uk/services/planning/planning-enforcement
IGas supports the monitoring of the Plan and particularly the Objective Policy for Climate Change (Flood Risk) and energy set out in Strategic Objectives 17 and 18 in respect of CO2 emissions per Capita (Tonnes) (Chapter 3); and in respect of Policy 65 - Providing for Energy Minerals (Gas and Oil) (Hydrocarbons) (Chapter 14) by monitoring the number of applications approved for development by recognising the benefits of hydrocarbons as a target and assessment.

Summary:
IGas supports the monitoring of the Plan

Response:
Comment noted
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<td>Response:</td>
<td>Responses to Representations in respect to SA are set out in the Wood Environment &amp; Infrastructure SA Report Addendum</td>
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Comment:
In terms of our area of interest, we would broadly agree with the evaluation and conclusions regarding the likely impact which the Policies and proposals of the Plan might have upon the historic environment and, where an adverse effect has been identified, support the proposed mitigation measures which have been proposed to reduce that harm. This opinion is based on the information provided by you in the document dated August 2019 and, for the avoidance of doubt, does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SA/SEA, have adverse effects on the environment.

Summary:
In terms of our area of interest, we would broadly agree with the evaluation and conclusions regarding the likely impact which the Policies and proposals of the Plan might have upon the historic environment and, where an adverse effect has been identified, support the proposed mitigation measures which have been proposed to reduce that harm. This opinion is based on the information provided by you in the document dated August 2019 and, for the avoidance of doubt, does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SA/SEA, have adverse effects on the environment.

Response:
Support welcomed
### Tests of Soundness:

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### Comment:

In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA) and also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. The SA/SEA is a systematic process that should be undertaken at every stage of the Plan's preparation, assessing the effects of the Doncaster Local Plan's proposals on sustainable development when judged against reasonable alternatives. The Council should ensure that the results of the SA clearly justify the policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative. The Councils' decision making and scoring should be robust, justified and transparent.

### Summary:

Refers to the need for the Local Plan to satisfy the requirements of Sustainability Appraisal.

### Response:

Responses to Representations in respect to SA are set out in the Wood Environment & Infrastructure SA Report Addendum.
3.1 This objection relates to the fact that although the site at Brodsworth Quarry has been previously promoted to the Council as a reasonable alternative to accommodate a mixed use development compared to sites that are subject to flood restraint or are suitable for agricultural use, it has failed to be considered in the development of the strategy as a “reasonable alternative” within the Sustainability Assessment. 3.2 As well as being promoted to the Authority it has also been subject to a memorandum on the Office of the Deputy Prime Minister website which sets out that the land owner and Persimmon Homes have previously undertaken consultations with the local community adjoining the site about developing the site as a Millennium Village. The memorandum sets out that there is an appreciation amongst the local population that the redevelopment of the site could have positive impacts on the wider communities, such as improved access to facilities and services, and an improvement to the overall image of the area which is one of Doncaster’s more disadvantaged locations. 3.3 The Council’s approach to identifying the likely significant effects has not had sufficient regard to the evidence base for the Local Plan (including its assessment of full objectively assessed housing need, see SPRU objection to Policy 3). This limits the degree to which the Local Plan’s proposals can be shown to have been developed as part of an iterative process, taking account of the appraisal’s findings at each stage of preparation as required by Planning Practice Guidance (ID: 11-018-20140306). 3.4 The Council has not ensured that realistic alternatives are considered for key issues, and that the reasons for choosing them are documented, as part of assessing the plan’s strategic priorities and how these might be delivered. This is a requirement of legislation for Sustainability Appraisal. Specifically, it is a requirement that all reasonable alternatives tested are realistic and deliverable (ID: 11-018-20140306). This is not the case for the scenarios tested as part of the Council’s Sustainability Appraisal, which in-turn means the Sustainability Appraisal does not provide an accurate understanding of the potential effects of the selected strategy compared to other reasonable alternatives. 3.5 The PPG requires all reasonable alternatives to be assessed against the same baseline environmental, economic and social characteristics (following paragraph 152 of the NPPF 2012). Furthermore, it makes it clear that reasonable alternatives must be assessed to the same level of detail: “The sustainability appraisal needs to compare all reasonable alternatives including the preferred approach and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the Local Plan were not to be adopted. ?The sustainability appraisal should identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them. The sustainability appraisal must consider all reasonable alternatives and assess them in the same level of detail as the option the plan-maker proposes to take forward in the Local Plan (the preferred approach).” 3.6 Planning Practice Guidance anticipates that a comprehensive range of options will be undertaken under ‘Stage B’ of the requirements for preparing the Sustainability Appraisal and align with the process for preparing the Local Plan at Regulation 18 stage (see ID: 11-013-20140306). 3.7 This has been considered through the Courts in Heard v Broadland (2012) EWHC 344 (Admin). In particular, see paragraphs 53 to 73, where the approach to the process of SA and alternatives are considered. In summary Ouseley J in paragraph 73 states: “?the aim of the directive, which may affect which alternatives it is reasonable to select, is more obviously met by, and it is best interpreted as requiring, an equal examination of the alternatives which it is reasonable to select for examination alongside whatever, even at the outset, may be the preferred option. It is part of the purpose of this process to test whether what may start out as preferred should still end up as preferred after a fair and public analysis of what the authority regards as reasonable alternatives?” 3.8 This is not the approach that has been taken by the Council in its assessment of reasonable alternatives. As such, its assessment is flawed in fundamental respects and does not follow the Regulations/the SEA Directive nor case law. 3.9 One such reasonable alternative is the site at Brodsworth Quarry which comprises of approximately 61 hectares of land adjacent to the western settlement boundary of Highfields, and immediately south of Adwick le Street, as illustrated in Figure 2. (SEE EMAIL FOR Figure 2. Site Location) 3.10 The site is a former limestone quarry that has been partly restored to low grade agricultural land. Due to its former use the site lies below the level of the surrounding land, which provides screening from surrounding sensitive uses. This is a very underutilised site with little or no environmental or ecological value and yet other sites have been considered more appropriate for promotion for development with the draft Plan. 3.11 While the site is connected to Highfields, it is also connected to Adwick le Street to the North and as such represents a very sustainable site. Review of Sustainability Criteria of Brodsworth Quarry 3.12 There are several local facilities and services in close proximity to the site, including, but not limited to, the following: - Allotments - Located to the north east (< 600 metres) - Highfields Primary School - Located to the east (< 800 metres) - Highfields Community Centre - Located to the east (< 800 metres) - Weldricks Pharmacy - Located to the north (< 800 metres) - The Woodlands Primary School - Located to the north (< 900 metres) - All Saints Church - Located to the north (< 900 metres) - Aagrah (Indian restaurant) - Located to the north east (< 1 kilometre) - Lloyds Bank - Located to the north (< 1.1 kilometres) - Woodlands Post Office - Located to the north (< 1.1 kilometres) - Woodlands Community Library and Hub - Located to the north (< 1.2 kilometres) - Outwood Academy - Located to the north (< 1.3 kilometres) - Adwick Leisure Complex - Located to the north east (< 1.4 kilometres) - Doncaster North Park and Ride - Located to the east (< 1.7 kilometres) 3.13 In addition to the above, it is of note that Adwick train station is located under 2.5 kilometres to the north east of the site. Northern services to Doncaster, Sheffield and Leeds are available from the station. 3.14 There are also several bus stops within 1.3 kilometres of the site in the Highfields settlement. The stops provide access to the following services: - 50: Doncaster - Skellow - 50a: Cantlel - Doncaster - Cartcroft - 50b: Doncaster - Skellow - 51: Doncaster - Skellow - Askern (Instoneville) - 51a: Doncaster - Skellow - Askern (Instonville) via Campsall - 52: Doncaster - Woodlands - Redhouse - South Elmsall - 54: Doncaster - Scawthorpe - Woodlands Circular - 203: Doncaster - Scawthorpe - Highfields - Pickburn - Hooton Pagnell - Clayton - Thurnscoe - Middlecliffe - Wombwell Site Description and accessibility
of Brodsworth Quarry 3.15 The site is relatively flat with a gentle decline in land levels towards Langthwaite Dyke to the north of the site. 3.16 To the north of the site beyond some significant tree coverage is the Adwick-le-Street and Woodlands settlement which comprises of predominantly residential development with a vast range of public transport links and local facilities and services. To the south east of the site along / beyond Green Lane there is a small amount of development which is predominantly residential, and to the south west beyond Green Lane there is greenfield land. 3.17 To the east of the site is the Highfields settlement which comprises of predominantly residential development, and to the west is the Brodsworth Community Woodland. Further to the west is the A1(M) Doncaster Bypass, and to the north west beyond the Brodsworth Community Woodland there is a garden centre and pet shop, a B&Q distribution centre and an Asda depot warehouse. 3.18 There are several existing pedestrian access points along Green Lane and South Street, and it is considered that vehicular access to the site could be provided from Green Lane. 3.19 Footpath "Brodsworth 6" runs along the south eastern boundary of the site, and footpath "Brodsworth 8" (Roman Ridge) runs directly adjacent to the eastern boundary of the site. 3.20 There are currently no utilities on the site. However, the proximity of the site to the urban area suggests that the service network could be extended to serve this site. 3.21 The site is located entirely within Flood Zone 1 on the Environment Agency's flood maps, which means that the site has a less than 1 in 1,000 annual probability of flooding from a river or sea. It is of note that the National Planning Practice Guidance sets out that residential development is an appropriate land use in Flood Zone 1 areas (Paragraph 066, reference ID 7-006-20140306). 3.22 The site is not located within a Conservation Area and there are no listed buildings or scheduled monuments on the site. The Woodlands Conservation Area is located to the north of the site beyond the tree coverage. Roman Ridge, which is a scheduled monument, runs directly adjacent to the eastern boundary of the site. 3.23 Within the site towards the eastern / south eastern boundary is the Tithe Barn Plantation which contains some agricultural buildings. The landowner has previously sought preapplication advice from Doncaster Metropolitan Borough Council regarding "Refurbishment and conversion of existing barn group into dwellings around existing central courtyard and demolition of steel framed barn adjacent" in the plantation area. The landowner intends to submit a planning application for the proposals in the near future. 3.24 It is understood that the ground conditions of the site have been dealt with by Wardell Armstrong who dealt with the restoration of the site, and a review of the site for contamination has been undertaken. Further to this, it is understood that a review of the site for mixed use and transport links has been undertaken, and an ecological assessment is available. The Deliverability of Brodsworth Quarry Available 3.25 The site is entirely within Mr Brealey's ownership. Mr Brealey has a strong interest in bringing the site forward for a mixed use development, and there has been previous interest in the site from Persimmon Homes. Suitable 3.26 The site does not have any physical constraints which suggest that a carefully designed mixed use development could not be brought forward during the plan period. Deliverable 3.27 Given the size of the site and its potential capacity, the site provides opportunities to deliver significant economic and housing growth, and vast developer contributions such as affordable housing, education and open space (subject to viability). 3.28 The Housing and Economic Land Availability Assessment (HELAA) housing map identifies Brodsworth Quarry (reference 184) as a deliverable / developable site which does not currently have planning permission. This is supported. 3.29 The HELAA 2017 - 2018 housing sites update firstly describes the site as a 61.379ha greenfield urban extension site which is proposed as a mixed use allocation but describes the site as greenfield. This description belies the fact that the land levels are clearly a result of the previous activity and the very low level of utility of the current land. 3.30 The housing update report describes the site as suitable for development (but with national policy constraints or physical constraints), available and deliverable, with a potential capacity of 1519 dwellings. Of these 1519 dwellings, 0 are considered developable in 0 - 5 years, 350 are considered developable in 6 - 10 years, 350 are considered developable in 11 - 15 years, and 819 are considered not developable beyond 15 years. 3.31 The HELAA 2017 - 2018 employment sites update also describes the site as suitable (but with national constraint) and available for economic development, but not marketable and therefore not deliverable. There is no reference to timeframe for delivery. 3.32 Similarly, the Site Selection Methodology and Results Report (dated June 2019) has an appendix (Appendix A1) which makes reference to sites that have been removed from the process as part of the housing and employment land availability assessment stage. Within the appendix, a number of employment sites are referenced which are considered to be suitable and available, but not marketable and therefore not deliverable. The site is included as one of these sites. (SEE EMAIL FOR Appendices) 3.33 In addition to the memorandum, it is understood that the site was also marketed by Fisher German in 2017. 3.34 It is also noted that the Council's employment land review (dated February 2018), which qualitatively assesses the suitability of potential sites that could become allocations for employment use, does not reference the site. 3.35 In light of the above, it is requested that the information in the HELAA is amended and the site is assessed by the Council in the same manner as the other sites in the employment land review were.

Summary:

Although Brodsworth Quarry has been previously promoted to the Council as a mixed use development, it is not considered as a "reasonable alternative" with the Sustainability Assessment. It has also been subject to a memorandum on the ODPM website setting out that the land owner and Persimmon Homes have previously undertaken consultations with the local community adjoining the site about developing the site as a Millennium Village. There is an appreciation amongst the local population that the redevelopment of the site could have positive impacts on the wider community. The Council's approach to identifying the likely significant effects has not had sufficient regard to the Local Plan evidence base (including its assessment of full objectively assessed housing need). This limits the degree to which the Local Plan evidence base can be shown to meet the reasons for refusal. There is a summary of the PPG requiring all reasonable alternatives to be assessed and a court case is also mentioned Heard v SA does not provide an accurate understanding of the potential effects of the selected strategy compared to other reasonable alternatives. This approach has not been taken by the Council. Therefore the assessment is flawed in and does not follow the Regulations/the SEA Directive nor case law. Brodsworth Quarry (61 hectares) adjacent to the western settlement boundary of Highfields, and immediately south of Adwick le Street is a reasonable alternative (see Figure 2 in email for site location). It is a former limestone quarry which has been partly restored to low grade agricultural land. It lies below the level of the surrounding land, providing screening from surrounding sensitive uses. It is very underutilised site with little or no environmental or ecological value and yet other sites have been considered more appropriate for promotion for development within the Plan. Review of Sustainability Criteria of Brodsworth Quarry There are several local facilities and services in close proximity to the site, including allotments; 2 primary schools; a community centre; a Pharmacy; a church; restaurants; a post office; library/community hub; secondary school; leisure centre; Park and Ride site and Adwick train station. There are also several bus stops in the Highfields settlement with services
across and beyond the borough boundary. The site is relatively flat with a gentle decline in land levels with significant tree coverage to the north. Adwick-le-Street and Woodlands are predominantly residential with a vast range of public transport links and local facilities and services. There is a small amount of development to the south which is predominantly residential and there is greenfield land to the south west. To the east is Highfields which is predominantly residential development, and to the west is the Brodsworth Community Woodland. Further to the west is the A1(M) Doncaster Bypass, and to the north west beyond the Brodsworth Community Woodland there is a garden centre and pet shop and employment units. There are several existing pedestrian access points along Green Lane and South Street, and vehicular access could be provided from Green Lane. There are footpaths on the site but no utilities but these could be extended to serve the site. It is within Flood Zone 1 and is not located within a Conservation Area and there are no listed buildings or scheduled monuments on the site. The Roman Ridge, which is a scheduled monument, runs directly adjacent to the eastern boundary of the site. The ground conditions of the site have been dealt with by Wardell Armstrong who dealt with the restoration of the site, and a review of the site for contamination has been undertaken. A review of the site for mixed use and transport links has been undertaken, and an ecological assessment is available. The Deliverability of Brodsworth Quarry The site is entirely within single ownership and there is a strong interest in bringing the site forward for a mixed use development with previous interest from Persimmon Homes. There are no physical constraints and the site provides opportunities to deliver significant economic and housing growth, and vast developer contributions such as affordable housing, education and open space (subject to viability). The HELAA (ref 184) identifies the site as deliverable / developable and this is supported. The HELAA description as greenfield belies the fact that the land levels are clearly a result of the previous activity and the very low level of utility of the current land. The site is mentioned in the housing update report and the HELAA 2017 - 2018 employment sites update. The Site Selection Methodology and Results Report (June 2019) Appendix A1 makes reference to sites that have been removed from the process as part of the housing and employment land availability assessment stage. A number of employment sites are referenced which are considered to be suitable and available, but not marketable and therefore not deliverable, including this site. The site was marketed by Fisher German in 2017. The Employment Land Review (dated February 2018) does not reference the site and it is considered that the HELAA is amended and the site is assessed by the Council in the same manner as the other sites in the Employment Land Review were.

Response:

Responses to Representations in respect to SA are set out in the Wood Environment & Infrastructure SA Report Addendum.
2.59 Having analysed the actual allocations in the Local Plan against the proposed target distribution in Policy 3 it is apparent that the distributions differ (see table on previous page). It is apparent that the Council's Sustainability Appraisal ('SA') has not considered the actual distribution of homes. Indeed the Sustainability Appraisal fails to assess the proposed distribution or the Local Plan target distribution. 2.60 The SA to accompany the 2015 Local Plan Issues and Options document included 6 alternative approaches to delivering the Boroughs growth needs and aspirations. This was refined following the consultation and a new hybrid option was developed which was appraised in the Growth Options SA Report in March 2016. The alternative options have then remained unchanged in the SA of the Informal Consultation Draft Policies and Proposed Sites (2018) and the SA of the Publication Draft (2019). All of alternative options have been based on a requirement of 920 dpa. The four SA options are: Option 1: Core Strategy approach Option 2: Doncaster and Main Town focus Option 3: Greater dispersal strategy Option 4: Hybrid option: urban concentration and dispersal. 2.61 Option 4 is the preferred approach which is a combination of Options 1 and 2. The appraisal of the 4 SA Options concludes that options 2 and 4 score best against the sustainability criteria. In summarising the preferred hybrid option the SA States at paragraph 5.2.10 that "It will maximise the regeneration of poorer urban areas, brownfield sites and existing service centres although could generate indirect regeneration benefits associated with greater delivery on higher value sites. This will ensure the benefits of growth, including jobs and housing, can be spread more widely across the Borough." 2.62 The SA of the Growth Options in March 2016 included a table of the distribution of the 920 dpa requirement in accordance with the 4 alternative distribution options. This is repeated overleaf in our Table 2. The distribution information of the individual options contained in the 2016 Growth Option SA is not repeated in the 2018 Informal Consultation SA or the 2019 Publication Draft SA, but the 2016 SA report is referred to. (SEE EMAIL FOR Table 2: Source SA of Doncaster’s Growth Options - March 2016). 2.63 The Hybrid Option in the above table is the preferred approach which is included in the Publication Draft SA. This distribution however differs from the Local Plan target distribution and the actual proposed distribution of allocations included in the Local Plan. Table 3 overleaf demonstrates this. It compares the actual housing distribution in the Local Plan with the 4 SA options. To assist in interpreting the figures the settlements shaded in green are settlements where the actual proposed allocations in the Local Plan fall within the SA Option 4 range (or within 20% of the Option 4 fixed target). Settlements highlighted in red are those settlements where the actual proposed allocations falls outside the SA Option 4 range (or more than 20% of the SA Option 4 fixed target). Of the 18 settlements in the hierarchy, only 8 settlements are proposing to deliver a level of housing that meets the distribution in the SA preferred Option 4. The Publication Draft SA therefore does not assess the Local Plan housing target distribution or the actual Local Plan proposed housing allocation distribution. This is a failing of the SA. Doncaster Main Urban Area SA Option 1: 6900-8832 SA Option 2: 7590-9660 SA Option 4: 6210-7590 SA Option 4 (Hybrid): 7136-7696 Local Plan Allocations: 7441 Local plan Target Distribution (Policy 3): 6905 - 7315 Main Towns Adwick - Woodlands SA Option 1: 483-690 SA Option 2: 497-690 SA Option 3: 497-690 SA Option 4 (Hybrid): 270-829 Local Plan Allocations: 482 Local plan Target Distribution (Policy 3): 255 - 765 Armthorpe SA Option 1: 483-690 SA Option 2: 497-690 SA Option 3: 497-690 SA Option 4 (Hybrid): 800 Local Plan Allocations: 1049 Local plan Target Distribution (Policy 3): 420 - 990 Conisborough & Denaby SA Option 1: 828-1035 SA Option 2: 497-690 SA Option 3: 497-690 SA Option 4 (Hybrid): 450-1009 Local Plan Allocations: 528 Local plan Target Distribution (Policy 3): 465 - 975 Dunscroft, Dunsville, Hatfield & Stainforth SA Option 1: 897 SA Option 2: 497-690 SA Option 3: 497-690 SA Option 4 (Hybrid): 1174 Local Plan Allocations: 1968 Local plan Target Distribution (Policy 3): 575 - 1805 Mexborough SA Option 1: 483-690 SA Option 2: 497-690 SA Option 3: 497-690 SA Option 4 (Hybrid): 465-1024 Local Plan Allocations: 310 Local plan Target Distribution (Policy 3): 485 - 985 Rossington SA Option 1: 897 SA Option 2: 497-690 SA Option 3: 497-690 SA Option 4 (Hybrid): 934 Local Plan Allocations: 1219 Local plan Target Distribution (Policy 3): 285 - 895 Thorne & Moorends SA Option 1: 828-1035 SA Option 2: 497-690 SA Option 3: 497-690 SA Option 4 (Hybrid): 450-1009 Local Plan Allocations: 736 Local plan Target Distribution (Policy 3): 510 - 1020 Service Towns and Larger Villages SA Option 1: 483-690 SA Option 2: 138-276 SA Option 4 (Hybrid): 165 Local Plan Allocations: 691 Local plan Target Distribution (Policy 3): 165 - 414 Local Plan Allocations: 35 SA Option 4 (Hybrid): 105 Local Plan Allocations: 255 Local plan Target Distribution (Policy 3): 125 Barnburgh - Harlington SA Option 1: 0 SA Option 2: 0 SA Option 3: Up to 207 SA Option 4 (Hybrid): 105 Local Plan Allocations: 66 Local plan Target Distribution (Policy 3): 108 Barnby Dun SA Option 1: 0 SA Option 2: 0 SA Option 3: Up to 207 SA Option 4 (Hybrid): 105 Local Plan Allocations: 104 Local plan Target Distribution (Policy 3): 105 Bawtry SA Option 1: 0 SA Option 2: 138-276 SA Option 3: 276-414 SA Option 4 (Hybrid): 105 Local Plan Allocations: 90 Local plan Target Distribution (Policy 3): 110 Carcroft - Skellow SA Option 1: Up to 345 SA Option 2: 138-276 SA Option 3: 276-414 SA Option 4 (Hybrid): 255 Local Plan Allocations: 307 Local plan Target Distribution (Policy 3): 250 Edlington SA Option 1: Up to 345 SA Option 2: 138-276 SA Option 3: 276-414 SA Option 4 (Hybrid): 226 Local Plan Allocations: 665 Local plan Target Distribution (Policy 3): 230 Finningley SA Option 1: 0 SA Option 2: 0 SA Option 3: Up to 207 SA Option 4 (Hybrid): 45 Local Plan Allocations: 50 Local plan Target Distribution (Policy 3): 55 Sprotbrough SA Option 1: 0 SA Option 2: 0 SA Option 3: Up to 207 SA Option 4 (Hybrid): 90 Local Plan Allocations: 80 Local plan Target Distribution (Policy 3): 95 Tickhill SA Option 1: 0 SA Option 2: 138-276 SA Option 3: 276-414 SA Option 4 (Hybrid): 165 Local Plan Allocations: 74 Local plan Target Distribution (Policy 3): 95 Table 3: Comparison between the 4 SA Options and a comparison of SA Option 4 with the Local Plan Allocations.
Auckley and Hayfield Green and Tickhill) where there are no known flood risk constraints. “However, in reality, the actual proposed allocations in the Local Plan only collectively allocate/deliver 379 homes in those three named settlements (just 2.4% of the total). This hardly equates to a growth focus to the south west. 2.65 Whilst SA Option 4 purports to have taken into account flood risk - and its choice as the preferred option was partly justified on that basis - the final proposed distribution in the Local Plan bears little relation to Option 4, with only 8 out of the 18 settlements falling within the range or within 20% of the proposed Option 4 target. It is therefore not clear to what extent - if at all - flood risk has been taken into account in arriving at the proposed distribution of development. 2.66 Whilst the Housing and Site Selection Methodology and Results Report includes information following the Flood Risk Sequential and Exception Tests and individual site assessment results, there does not appear to be any information within the Publication Draft or evidence base that outlines the overall quantum of development proposed within the Borough in areas of high flood risk. While this information may be made available in the Flood Risk Topic Paper which will be issued at Plan Submission it should be available now to allow a proper consideration of whether flood risk has been adequately reflected. 2.67 The justifying text to Policy 3 at paragraph 4.41 states that: “The economic-led element of the housing allocation requirement (approximately 4,905 homes) is directed to the most sustainable and deliverable sites in the Doncaster Main Urban Area and Main Towns in accordance with defined ‘growth ranges’; these ranges provide flexibility to select the most sustainable and deliverable sites across these settlements. The sequential test approach is applied to urban sites and sustainable urban extensions across these settlements subject to the growth ranges. The Settlement Audit shows that Doncaster and the seven Main Towns are larger and have a greater service function than other settlements in the Borough. (underlining is our emphasis) 2.68 It appears from the above explanation, that the proposed distribution of dwellings has been considered ahead of the sequential test. This would be the inverse of the correct approach - the results of the sequential test should be a determining factor in establishing the proposed distribution. 2.69 Carrying out an SA of the Local Plan is a legal requirement which the Council have not met - instead they have carried out an assessment of an arbitrary housing distribution which bares little resemblance to the actual one being pursued. Nor has the SA considered a Spatial Distribution which seeks to minimise the amount of development to be delivered in the Green Belt and in areas at risk of flooding. Given national policy requirements in respect of both of those designations, that must be considered a reasonable alternative. The Local Plan is therefore unsound as it is not justified and is not reflective of national policy. Summary: The actual amount of homes distributed around the borough has not been assessed in the SA, which only considers the target distribution. The options have remained unchanged since the 2015 SA. The level of distribution in the SA does not reflect the actual distribution. Of the 18 settlements in the hierarchy, only 8 are proposing to deliver a level of housing that meets the distribution that is in the SA preferred option 4. It does not assess the target distribution or the actual Local Plan allocation distribution. This is a failing of the SA. Doncaster Main Urban Area SA Option 1: 6900-8832 SA Option 2: 7590-9660 SA Option 1: 8210-7590 SA Option 4 (Hybrid): 7136-7696 Local Plan Allocations: 7441 Local plan Target Distribution (Policy 3): 6805 - 7315 Main Towns Adwick - Woodlands SA Option 1: 483-690 SA Option 2: 497-690 SA Option 3: 497-690 SA Option 4 (Hybrid): 270-829 Local Plan Allocations: 482 Local plan Target Distribution (Policy 3): 255 - 765 Armthorpe SA Option 1: 483-690 SA Option 2: 497-690 SA Option 3: 497-690 SA Option 4 (Hybrid): 800 Local plan Allocations: 1049 Local plan Target Distribution (Policy 3): 420 - 990 Conisbrough & Denaby SA Option 1: 828-1035 SA Option 2: 497-690 SA Option 3: 497-690 SA Option 4 (Hybrid): 1174 Local plan Target Distribution (Policy 3): 1968 Local plan Target Distribution (Policy 3): 575 - 1805 Mexborough SA Option 1: 483-690 SA Option 2: 497-690 SA Option 3: 497-690 SA Option 4 (Hybrid): 465-1024 Local plan Allocations: 310 Local plan Target Distribution (Policy 3): 485 - 985 Rossington SA Option 1: 897 SA Option 2: 497-690 SA Option 3: 497-690 SA Option 4 (Hybrid): 934 Local plan Target Allocations: 1219 Local plan Target Distribution (Policy 3): 285 - 895 Thorne & Moorends SA Option 1: 828-1035 SA Option 2: 497-690 SA Option 3: 497-690 SA Option 4 (Hybrid): 450-1009 Local Plan Allocations: 736 Local plan Target Distribution (Policy 3): 510 - 1020 Service Towns and Larger Villages Askern SA Option 1: 483-690 SA Option 2: 128-276 SA Option 3: 304 SA Option 4 (Hybrid): 165 Local Plan Allocations: 691 Local plan Target Distribution (Policy 3): 165 Auckley - Hayfield Green SA Option 1: 0 SA Option 2: 0 SA Option 3: Up to 207 SA Option 4 (Hybrid): 105 Local Plan Allocations: 255 Local plan Target Distribution (Policy 3): 125 Barnburgh - Harlington SA Option 1: 0 SA Option 2: 0 SA Option 3: Up to 207 SA Option 4 (Hybrid): 105 Local Plan Allocations: 66 Local plan Target Distribution (Policy 3): 60 Barnby Dun SA Option 1: 0 SA Option 2: 0 SA Option 3: Up to 207 SA Option 4 (Hybrid): 105 Local Plan Allocations: 104 Local plan Target Distribution (Policy 3): 30 Bawtry SA Option 1: 0 SA Option 2: 138-276 SA Option 3: 276-414 SA Option 4 (Hybrid): 105 Local Plan Allocations: 90 Local plan Target Distribution (Policy 3): 110 Carcroft - Skellow SA Option 1: Up to 345 SA Option 2: 128-276 SA Option 3: 276-414 SA Option 4 (Hybrid): 255 Local Plan Allocations: 307 Local plan Target Distribution (Policy 3): 250 Edlington SA Option 1: Up to 345 SA Option 2: 138-276 SA Option 3: 276-414 SA Option 4 (Hybrid): 226 Local Plan Allocations: 665 Local plan Target Distribution (Policy 3): 30 Finningley SA Option 1: 0 SA Option 2: 0 SA Option 3: Up to 207 SA Option 4 (Hybrid): 45 Local Plan Allocations: 50 Local plan Target Distribution (Policy 3): 55 Sprotbrough SA Option 1: 0 SA Option 2: 0 SA Option 3: Up to 207 SA Option 4 (Hybrid): 90 Local Plan Allocations: 80 Local plan Target Distribution (Policy 3): 95 Tickhill SA Option 1: 0 SA Option 2: 138-276 SA Option 3: 276-414 SA Option 4 (Hybrid): 165 Local Plan Allocations: 74 Local plan Target Distribution (Policy 3): 165 Table 3: Comparison between the 4 SA Options and a comparison of SA Option 4 with the Local Plan Allocations. The SA also appears to consider the borough wide issue of flooding. It states in paragraph 5.2.23: that option 4 focusses more growth to the south west of the borough where there are less constraints, however, in reality the actual proposed allocations in the Local Plan only deliver 379 homes / 2.4% of the total so hardly equating to south west growth focus. Whilst the SA purports to have taken flood risk into account, the proposed distribution bears little resemblance to Option 4. Only 8 / 18 settlements fall within range or within 20% of the option 4 target. It is therefore unclear as to what extent, if at all, flood risk has been taken into account in the proposed distribution. The Site Selection Methodology includes info from the flood risk sequential test and site assessment results, there appears to be no evidence on the overall quantum of development proposed within the borough in areas of high flood risk. Info should be available now, not in a future flood risk paper, to allow proper consideration of it. From para. 4.41 of Policy 3 it appears the housing distribution was considered ahead of the sequential test. This would be the inverse of the correct approach. The results of a sequential test should determine the distribution. The council have not met the legal requirement to carry out an SA. They have assessed an arbitrary housing number which bares little resemblance to the actual one being pursued. It has not considered an option to minimised green belt or flood risk development. Given national policy requirements, that must be considered a reasonable alternative. The plan is therefore unsound and not justified or reflective of national policy.
The Council have commissioned Wood Environment & Infrastructure Solutions UK limited ('Wood') to undertake a Sustainability Appraisal (SA), and this includes an assessment of all sites that have been put forward for consideration as potential housing allocations. The SA sets out a series of sustainability objectives, which have a number of sub objectives along with a bullet point summary of how the objectives will be achieved. A qualitative scoring system has been adopted which is set out in Table 2 of the SA and copied below for ease of reference: (SEE EMAIL FOR image)

The scoring system used has four possible responses with: (+) Green being positive i.e. likely to assist with sustainable development, (-) red being a negative or incompatible i.e. likely to compromise sustainable development, - (0) white/blank being neutral i.e. likely to involve both compatible and incompatible effects; and - (?) Unlikely to be related or Uncertain i.e. effects cannot be judged at this stage. Our representations to the Local Plan should be read in conjunction with this assessment of the SA, however, our Client has fundamental concerns with the Council's approach to housing delivery over the Plan Period. Firstly, the Council have backdated the Plan to 2015 to enable historical completions to contribute to the housing requirement, this should only be from 2018 onwards, when the Council progressed with the Local Plan review. As such, our Clients view is that there should be a substantial increase in housing allocations over and above those which are proposed, and our Clients land interest in Bawtry (specifically site ref: 146 - Tickhill Road, Bawtry) represents the most suitable site in terms of a future housing allocation.

Notwithstanding our Clients position above, if the Council proceed with the plan as currently drafted, and only propose to allocate five sites in Bawtry (site ref: 950, 966, 982, and 499) in addition to our Clients site ref: 141. Tables H1 and H2 of the Publication Local Plan (below) split those sites into two categories, those with planning permission and those without. (SEE EMAIL for tables) Our Client has interests in site ref: 141 on Westwood Road but our view remains that our Clients site ref: 146 scores more favourably than site 499, Land off North Avenue and should be allocated. In order to make a robust comparison, we have added a simple numerical scoring system as follows: (+) Green = 2 (neutral) = 1 i.e. likely to involve both compatible and incompatible effects; and (-) red = 0 (?) Unlikely to be related or Uncertain i.e. effects cannot be judged at this stage. Based on these numerical scores we have compared site ref: 499 Land off North Avenue, Bawtry against our Clients' site ref: 146 Tickhill Road, Bawtry. As it stands the Council claim that site ref: 146 - Tickhill Road, Bawtry has a cumulative score of 35 and that site ref: 499 - Land off North Avenue, Bawtry has a cumulative score of 41. Having reviewed the Council's assessment of our Client's site (at Appendix N), we have concluded that a number of the assessments are incorrect, and our Clients' site has been downgraded based on inaccurate information. The inaccuracies are as follows: Objective 3A and Sub Objectives i), ii) and iii) relate to the promotion of the use of public transport. The commentary notes that the site lies within 1200m of a train station and between 400m - 800m of a high frequency bus stop. The site is also within recognised cycle distances of a cycle network and local services. Based on nationally recognised guidance the site is actually within walking or cycling distance of local schools, shops, employment opportunities and local amenities in Bawtry, all within 2km walking distance and 5km cycling distance of the site. These measures are drawn from the Institution of Highways and Transportation (IHT) document 'Guidelines for Providing for Journeys on Foot' (1998) which details the preferred maximum walking distance of 2km. The IHT and Department for Transport (DFT) document 'Cycle Friendly Infrastructure: Guidelines for Planning and Design' (1996) provides a guide on suggested cycle speeds associated with cyclists of varying confidence and ability. Using a speed of 10mph (16kph) a catchment of 5km would be available within approximately 20 minutes' cycle time. The Council have identified our site as Red (0) but given that the site falls within recognised walking and cycling distance of a train station and bus stop that this site should have been assessed as Green (2) Sub Objective 3B i) Will the site be accessible to an existing centre? Given the accepted distances highlighted above, relating to journeys on foot and by bicycle, the site is well located to an existing centre and shopping parade. We propose that the scoring of neutral (1) is assessed as green (2). Sub Objective 3B ii) Will the site be accessible to a primary school? The Council state that the site lies within 400m - 800m of a primary school which is within widely accepted walking distances. The Council have scored a neutral (1); we propose the site is assessed as green (2). Sub Objective 3B iii) Will the site be accessible to a secondary school? The Council comment that the site lies over 2km away from a secondary school, but it is worth pointing out that the site is within 800m of a bus stop. In addition, children of secondary school age are capable and more likely to travel to and from school by bus. We propose the negative Red (0) score is assessed as neutral (1) score. Sub Objective 3B iv) Will the site be accessible to a GP? The Council comment that the site lies within 800m of a GP surgery and is given a Green (2) score. We support this score but question why the accessibility of a GP surgery attracts a higher score than the accessibility of an existing centre or a primary school. We reiterate that the respective scores for access to those facilities should be assessed as Green (2). In summary, it is clear that the neutral and negative scores on this site in relation to accessibility should have been assessed as green (2) rather than amber (1) and red (0). The Council's assessment of the site is a flawed assessment as the site is located adjacent to the village boundary, 500m from the primary school and 600m from the GP Surgery with good public transport links. SD i) related to availability and specifically asks "Has the site been identified as an opportunity to address housing market failure?". The Council have given the score of neutral (1) and their reasons for doing so is that the site is not a formerly cleared housing site. The site is a green field agricultural site, adjacent to the settlement limits and is available for development as demonstrated within our previous representations. This objective should have been assessed as a Green (2) as opposed to a neutral (1). 8A iii) Will the site avoid known areas of landfill sites? And; iv) Will the site avoid known areas of unstable land? The Council have confirmed that the site not located within an area identified as containing a closed landfill site. Therefore, the site will avoid known areas of landfill and therefore fully complies with the objective. The site is an agricultural
field that has not had any buildings or alternative uses and the Council’s neutral (1) rating is unfounded, the rating should be Green (2) as it wholly complies with that element of the objective. 8B relates to infrastructure. Sub-objective i) asks “Will the site have an impact on the Strategic Road Network?” The Council comment that the impact upon the Strategic Road Network (SRN) is expected to be mitigated but other, committed, schemes. As such the Council are claiming that there is no impact upon the SRN. In light of this the score should be assessed as Green (2) rather than neutral (1). Sub-objective iii) Will any additional demand for primary school places be likely from the site? The council note that the site is located within the catchment of a primary school with additional places needed. 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Given that the school is currently slightly under capacity and that planning contributions would form part of any application on this scale we propose that the negative red (0) score be assessed as a Green (2) score. Objective 9 relates to improvement in the health and well-being of the borough’s population. Sub Objective 9A i) asks “Does the site have access to formal and informal open spaces?” The Council’s response is that the site is within the catchment of either a formal or informal open space. However, the Council have failed to acknowledge that a development of this size will no doubt include public open space with the development proposal and/or pay a commuted sum for the provision of such opportunities through associated legal agreements. We suggest the site is assessed as Green (2) rather than neutral (1). Objective 12 seeks to protect, increase and enhance the natural environment, including the landscape, its underlying geology and wildlife habitat. Sub Objective 12 A i) asks, Will the site affect biodiversity? The site is an agricultural field but the Council’s assertion that development of the site would negatively affect biodiversity is unfounded. As part of a comprehensive submission the proposed scheme could in fact result in a net gain in terms of biodiversity. The Council have scored this element as a negative red (0). We believe the site should be assessed as a neutral (1), potentially moving up to a Green (2) with suitable mitigation. Similarly, sub objective 12 B i) relating to the impact upon Landscape, states that the site located in a broad area assessed as having ‘moderate’ landscape capacity. The council have scored the impact as a neutral (1) however, with a comprehensive Landscape Visual Impact Assessment potential impacts could be mitigated and further enhanced. As such we believe the scoring should be Green (2). Objective 13 seeks to protect, conserve and enhance the historic and cultural heritage. The Councils comments relating to the impact upon heritage assets and archaeological features are essentially that there are no heritage assets that would be impact upon, and no known archaeological objection to the proposed allocation of the site. So, bearing in mind, the development will not affect a conservation area, a listed building or its setting, non-designated heritage assets, registered historic park or gardens, registered battlefields or a scheduled ancient monument. However, the Council consider that these objectives are assessed as neutral (1). We propose that, given there is no known impact, this objective should be assessed as Green (2). Objective 14 seeks to Protect and enhance soil, air and water quality (watercourses and ground water) Sub-Objectives B and C relate to water and air quality respectively. The council state that the site is located 25m or further from an identified surface water body and located outside of an AQMA or National Exceedance Area. Given that there appears to be no immediate impact, and that any application would include a suite of mitigation measures we proposed that these elements are assessed as Green (2), as opposed to neutral (1). Taking the numerous inaccuracies outlined above into account, we set out below how the site should be assessed, had the approach been fair and consistent. Site ref: 146 - Tickhill Road, Bawtry = 51 Scoring considerably higher than the allocated land off North Avenue. As noted from the above commentary, the Council’s assessment is inaccurate and has led our Clients land interest being substantially downgraded, when in fact it scores higher than the other proposed allocations within the settlements of Bawtry.

Summary:
Assessment of Sustainability Appraisal of Local Plan  Has concerns with the Sustainability Appraisal (Wood). 1. Plan should run from 2018. 2. Housing completions 2015-2018 should not contribute to supply. 3. Contends that site 146 should score better than site 149 (allocated) 4. Says assessment contains inaccuracies which result in site 146 being downgraded. 5. With 'inaccuracies' corrected site 146 scores better than 149

Response:
Responses to Representations in respect to SA are set out in the Wood Environment & Infrastructure SA Report Addendum
The Council have commissioned Wood Environment & Infrastructure Solutions UK limited ('Wood') to undertake a Sustainability Appraisal (SA), and this includes an assessment of all sites that have been put forward for consideration as potential housing allocations. The SA sets out a series of sustainability objectives, which have a number of sub objectives along with a bullet point summary of how the objectives will be achieved. A qualitative scoring system has been adopted which is set out in Table 2 of the SA and copied below for ease of reference:

<table>
<thead>
<tr>
<th>Comment Ref:</th>
<th>C/Sustainability Appraisal/04956/1/020</th>
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<tr>
<td>Date:</td>
<td>30/09/2019</td>
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<tr>
<td>Organisation:</td>
<td>Barton Willmore</td>
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<td>Representing:</td>
<td>Barratt and David Wilson Homes</td>
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<td>Reason:</td>
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<td>Policy:</td>
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<td>Tests of Soundness:</td>
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The scoring system used has four possible responses with: (+) Green being positive i.e. likely to assist with sustainable development, (-) red being a negative or incompatible i.e. likely to compromise sustainable development, - (0) white/blank being neutral i.e. likely to involve both compatible and incompatible effects; and (? ) Unlikely to be related or Uncertain i.e. effects cannot be judged at this stage. Our representations to the Local Plan should be read in conjunction with this assessment of the SA, however, our Client has fundamental concerns with the Council's approach to housing delivery over the Plan Period. Firstly, the Council have backdated the Plan to 2015 to enable historical completions to contribute to the housing requirement, this should only be from 2018 onwards, when the Council progressed with the Local Plan review. As such, our Clients view is that there should be a substantial increase in housing allocations over and above those which are proposed, and our Clients land interest in Bawtry (specifically site ref: 146 - Tickhill Road, Bawtry) represents the most suitable site in terms of a future housing allocation.

Notwithstanding our Clients position above, if the Council proceed with the plan as currently drafted, and only propose to allocate five sites in Bawtry (site ref: 950, 966, 982, and 499) in addition to our Clients site ref: 141. Tables H1 and H2 of the Publication Local Plan (below) split those sites into two categories, those with planning permission and those without. (SEE EMAIL for tables) Our Client has interests in site ref: 141 on Westwood Road but our view remains that our Clients site ref: 146 scores more favourably than site 499, Land off North Avenue and should be allocated. In order to make a robust comparison, we have added a simple numerical scoring system as follows: (+) Green = 2 (neutral) = 1 i.e. likely to involve both compatible and incompatible effects; and (-) red = 0 (?) Unlikely to be related or Uncertain i.e. effects cannot be judged at this stage. Based on these numerical scores we have compared site ref: 499 Land off North Avenue, Bawtry against our Clients' site ref: 146 Tickhill Road, Bawtry. As it stands the Council claim that site ref: 146 - Tickhill Road, Bawtry has a cumulative score of 35 and that site ref: 499 - Land off North Avenue, Bawtry has a cumulative score of 41. Having reviewed the Council's assessment of our Client's site (at Appendix N), we have concluded that a number of the assessments are incorrect, and our Clients' site has been downgraded based on inaccurate information.

The inaccuracies are as follows: Objective 3A and Sub Objectives i), ii) and iii) relate to the promotion of the use of public transport. The commentary notes that the site lies within 1200m of a train station and between 400m - 800m of a high frequency bus stop. The site is also within recognised cycle distances of a cycle network and local services. Based on nationally recognised guidance the site is actually within walking or cycling distance of local schools, shops, employment opportunities and local amenities in Bawtry, all within 2km walking distance and 5km cycling distance of the site. These measures are drawn from the Institution of Highways and Transportation (IHT) document 'Guidelines for Providing for Journeys on Foot' (1998) which details the preferred maximum walking distance of 2km. The IHT and Department for Transport (DFT) document 'Cycle Friendly Infrastructure: Guidelines for Planning and Design' (1996) provides a guide on suggested cycle speeds associated with cyclists of varying confidence and ability. Using a speed of 10mph (16kph) a catchment of 5km would be available within approximately 20 minutes' cycle time. The Council have identified our site as Red (0) but given that the site falls within recognised walking and cycling distance of a train station and bus stop that this site should have been assessed as Green (2) Sub Objective 3B i) Will the site be accessible to an existing centre? Given the accepted distances highlighted above, relating to journeys on foot and by bicycle, the site is well located to an existing centre and shopping parade. We propose that the scoring of neutral (1) is assessed as green (2). Sub Objective 3B ii) Will the site be accessible to a primary school? The Council state that the site lies within 400m - 800m of a primary school which is within widely accepted walking distances. The Council have scored a neutral (1); we propose the site is assessed as green (2). Sub Objective 3B iii) Will the site be accessible to a secondary school? The Council comment that the site lies over 2km away from a secondary school, but it is worth pointing out that the site is within 800m of a bus stop. In addition, children of secondary school age are capable and more likely to travel to and from school by bus. We propose the negative Red (0) score is assessed as a neutral (1) score. Sub Objective 3B iv) Will the site be accessible to a GP? The Council comment that the site lies within 800m of a GP surgery and is given a Green (2) score. We support this score but question why the accessibility of a GP surgery attracts a higher score than the accessibility of an existing centre or a primary school. We reiterate that the respective scores for access to those facilities should be assessed as Green (2). In summary, it is clear that the neutral and negative scores on this site in relation to accessibility should have been assessed as green (2) rather than amber (1) and red (0). The Council's assessment of the site is a flawed assessment as the site is located adjacent to the village boundary, 500m from the primary school and 600m from the GP Surgery with good public transport links. SD i) related to availability and specifically asks "Has the site been identified as an opportunity to address housing market failure?". The Council have given the score of neutral (1) and their reasons for doing so is that the site is not a formerly cleared housing site. The site is a green field agricultural site, adjacent to the settlement limits and is available for development as demonstrated within our previous representations. This objective should have been assessed as a Green (2) as opposed to a neutral (1). 8A iii) Will the site avoid known areas of landfill sites? And; iv) Will the site avoid known areas of unstable land? The Council have confirmed that the site not located within an area identified as containing a closed landfill site. Therefore, the site will avoid known areas of landfill and therefore fully complies with the objective. The site is an agricultural
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Response:
Responses to Representations in respect to SA are set out in the Wood Environment & Infrastructure SA Report Addendum
Gateway 180, Bradholme Farm (Site 160) We are concerned that the merits of Site 160 and also the local support for this site have not been considered in significant detail, resulting in its deselection in favour of Site 001. As noted above, we consider Site 001 has more serious constraints and is not the most suitable or sustainable site for employment development near to Thorne within the M18/M180 corridor. Site 160, Bradholme Farm was originally identified for allocation within the informal consultation on the Draft Policies and Proposed Sites (September 2018). The Site Selection Methodology (Part 4) Report identified the following rationale within table 9.26 for the proposed allocation of the site within the Draft Policies and Proposed Sites (October 2018): “As with all the potential sites within the M18 corridor, this site fails the flood risk sequential test as it is within Flood Zone 3. It scores similar to the other sites through the Sustainability Process. It is currently within Countryside Policy Area as designated by the UDP and classified as ’Reserve’ in HELAA - attractive to the market after other sites have been developed. This site would provide a good job creation opportunity in the north of the borough. There is a requirement for flood mitigation and the creation of wildlife habitats and due to the size of the site but both these issues can be overcome. Although there are successful employment sites to the north of Thorne it is clear that there is clear developer intention to develop this site for B8 and B2 uses and it is within single ownership. Therefore there are no doubts over deliverability. It is sufficient large enough to be able to address any transport related issues such as public transport. It is considered that 70% of the site will be developed in the plan period (40.37 ha). The majority of development will be for B8 (80%)”. However, moving forwards, the Doncaster Local Plan Housing and Employment Site Selection Methodology and Results Report Publication Version (June 2019) and the Sustainability Appraisal of the Doncaster Local Plan 2015 - 2035: Publication Version identify that Site 160 was deselected for the following reasons: “As with all the potential sites within the M18 corridor, this site fails the flood risk sequential test as it is within Flood Zone 3. It scores similarly to the other sites through the Sustainability Appraisal process. It is currently within Countryside Policy Area as designated by the UDP Proposals Map. Core Strategy Policy CS3: Countryside also applies as it continues to protect the countryside to the east of the borough through Countryside Protection Policy Area. It is classified as ’Green’ in HELAA - attractive to the market. There is a requirement for flood mitigation and the creation of wildlife habitats and the developer can address this through the masterplan/design statement. The Informal Consultation on the Local Plan in September - October 2018 produced a number of consultation responses in opposition to this site – see Draft Policies and Proposed Sites Consultation Summary for further information. The allocation of this site would exceed the supply of employment land for this plan period. Sites other than this one have been chosen for allocation in order to provide a balanced distribution of employment land across the Borough”. This basis for rejection relies substantially on public objections which are not themselves supported by material planning considerations or ones which carry any significant weight. This again displays weaknesses in the Council’s site selection methodology as previously identified in the report of the Inspector who conducted the Core Strategy Examination in Public. With regards to the responses to the Draft Policies and Proposed Sites (September 2018) consultation we note that these predominately relate to the following: - Flood Risk - Accessibility - Loss of best quality Agricultural Land - Traffic Movements - Whilst technical information has previously been submitted in relation to these issues we set out below our rebuttal which demonstrated that there are no technical constraints to the delivery of Site 160, Bradholme Farm and also the flaws with the Sustainability Appraisal undertaken by Wood Environment and Infrastructure Solutions UK LTD. It should also be noted that the site is now in the control of Harworth Group Plc which has significant experience of delivering large strategic employment sites. Flood Risk - We note that the site has been given a negative score within the Sustainability Appraisal of the Doncaster Local Plan 2015 - 2035: Publication Version for main river flooding under Criterion 11 Ai. Current and earlier strategic and site specific Flood Risk Assessment (FRA) work has demonstrated the significant distance of Bradholme Farm from the River Don and the River Trent system. There are intervening barriers (motorway, railway) between the River Don and Bradholme Farm. Whilst much of the site is currently shown to be located within Flood Zone 3 of the EA’s flood map, the EA themselves, IDB and LLFA have all confirmed that Site 160 is located outside of the area of risk of flooding from Main Rivers, and the main source of flood risk is due to the potential failure of a pumping station, which pumps water from the Brierholme Carr Drain into the South Soak Drain. Further to this, the EA and LLFA do not regard Site 160 as being located within the design standard floodplain and therefore the site will not result in any loss of floodplain to the surrounding area and will not increase flood risk elsewhere. Therefore, there is no requirement for any floodplain compensation on the site. There has also been no history of flooding at Bradholme Farm. The Flood Risk Note prepared by BWB contained within Appendix 6 confirms that Bradholme Farm is outside of areas at risk from Main River Network. We therefore consider that the site should have been scored as neutral or at the very least neutral for Criteria 11 A(i). In relation to criterion 11A (iii) Areas Benefitting from Flood Defences, Bradholme Farm has been scored as negative. We note that the comment in the Bradholme Farm Site 160 assessment matrix at page 49 of the Sustainability Appraisal Appendix O states "the proposal is not within an area benefiting from flood defences and is at risk of main river flooding (FRZ2/3)". We assume that this is based on the SFRA or simple flood risk zone rating and takes no account of site specific FRA work past and current. Nor does it take account of the mitigating effect of barriers and distance between the site and the River Don. Bradholme Farm does benefit from flood risk defences relating to land drainage. We therefore consider that the site should have been scored as neutral for Criteria 11 A(iii). The above information has been raised during earlier representations and a recent pre-application enquiry. It is therefore worrying that this technical information has not been considered as part of the Sustainability Appraisal and demonstrates significant flaws in the Councils evidence base which has been used to inform the Publication Draft Local Plan. Accessibility A review of the accessibility of Site 160, Bradholme Farm is contained within the Accessibility Review prepared by
Development Planning Limited in support of these representations and is included within Appendix 4. It should be read alongside the comments raised below. The site scores relatively well within the Council's Sustainability Appraisal, and is identified as having a positive effect for criterion 3(Ai) promotion of the use of trains, a neutral score for criterion 3(Aii) the proximity to high frequency bus services and a positive score for criterion 3(Aiii) the proximity to a cycleway. We agree with the rating of criterion 3(Ai) and 3(Aiii) for the reasons set out below. The site is located adjacent to the southern boundary of Thorne, with continuous footways available from around 60m north of the site, once across the lightly trafficked canal bridge. For cycling, South End passes by the northern boundary of the site and provides a lightly trafficked low-speed route into Thorne. The closest railway station to Bradholme Farm is Thorne South railway station. Thorne South is on the routes to Scunthorpe and Doncaster. The railway station is located around 600m (7minute's walk) from the boundary of the site. The travel time to Doncaster from Thorne South is 21 minutes. The walking experience to the railway station is the same as a pedestrian accessing Thorne and is considered to be pleasant. We disagree however with the neutral score for criterion 3(Aii). The site currently benefits from bus routes 8, 8A and 84 passing the site. Overall, the services provide an approximate hourly frequency of buses in both directions, operating during the day from around 06:57am to 23:32pm. With the exception of the 06:00am 24-hour shift pattern start time, all other typical start and finish times can be accommodated on the existing services. Additional patronage could increase revenues on those services by #100k to #150k per year, helping to ensure their longer-term viability. We therefore consider that Site 160, Gateway 180, Bradholme Farm site should have a positive score for criteria 3(Aii) as there are a number of bus services which pass the site. Overall it is clear that Site 160, Bradholme Farm is significantly more accessible and sustainable than Site 001, T портал North. This is highlighted in the comparison table contained within the Accessibility Review in Appendix 4. Highways With regards to Highways Capacity (criterion 8(Ai) Bradholme Farm scores a negative rating within the Sustainability Appraisal of the Doncaster Local Plan 2015 - 2035: Publication Version. An initial Preliminary Feasibility Study (dated February 2017) and subsequent Technical Note in relation to M180 Junction 1 (January 2018) have also been prepared by Development Planning Limited (copies attached in Appendix 7). The Feasibility Study considers the existing and forecast local transport environment and potential implications of a mixed use employment scheme (and residential development - now discounted). The study identifies that a key junction on the local highway network is M18 Junction 5 due to its strategic importance for access to the site and also in terms of its inter-urban connections across the region. M18 Junction 5 was improved in 2015 as part of the Highways Agency Pinch Point funding programme. The first part of the study further improvements were proposed as part of the Unity development (west of the M18) which result in a very similar junction to that previously proposed as the highway mitigation scheme for the Hatfield Colliery site. The Transport Assessment for the Unity development forecasts that, with the exception of the Unity site access ('MOTO') arm of the roundabout, the fully improved M18 Junction 5 could operate satisfactorily in 2038. The 2008 Transport Assessment for Bradholme Farm forecast that the improvements proposed at M18 Junction 5 for the Hatfield Colliery site could accommodate the development proposals with no further improvement. It should be noted that the 2008 Transport Assessment for Bradholme Farm considered as part of application ref. 08/03189/FULM forecast that two additional local junctions could require signalisation as part of the development proposals. The Officers Report for the previous application ref. 08/03189/FULM at Bradholme Farm states that: "It will be necessary to improve two junctions on the local road network; the A18 Tudworth Road junction with the M180 westbound on-slip, and the A18 Tudworth Road/A641 Stone Hill junction, in order to accommodate the traffic generated by the proposed development. Both junctions are currently 'give-way' type layouts; it is proposed to signalise them to provide additional capacity. The Traffic Assessment has taken into account 'committed development' such as the Hatfield Power Park and other development around Junction 5 of the M18. Those proposals include the signalisation and widening of the Junction 5 roundabout but the assessment also provides for alternative highway works that could be implemented in the event of that committed development not taking place for whatever reason. The conclusion is that subject to the improvements referred to both Junction 5 and the slip roads at Junction 1 of the M180 are able to accommodate the traffic from the proposed development. " There were therefore no significant issues in relation to highways capacity in relation to this proposal. For a new B8 proposal on the Bradholme Farm site the forecast scale of traffic impact could result in a similar conclusion in marginal additional traffic impact. The traffic generation from a B2 land use is higher than that for a B8 land use and, as such, a predominantly B2 proposal could result in additional offsite highway works being required. All traffic impacts would need to be modelled in detail to confirm the mitigation requirements. The Technical Note in relation to junction 1 of the M180 identifies that a previous traffic study for the site provided a forecast traffic distribution of 90% of light vehicles and up to 100% of heavy vehicles being likely to route to the west of the site on the M180, or to local destinations via local routes to the north or south of the site. The residual (circa) 10% of vehicles which were forecast to travel to the east of the site are likely to use the A18, which provides a direct link to Scunthorpe (for light vehicles) and, also, provides access to the M180 (east) using the A161. Both the A18 and the A161 carry signs which confirm that they are recommended routes for goods vehicles. As such, if any of the B8 developments were to or from the east they are able to access the M180 (east) using the A18. The forecast impact on the A18 is around one additional vehicle movement per minute during the peak hours. Such a small impact is likely to have a minimal or negligible impact on the operation of an 'A' classification road. A Transport Assessment Scoping has been undertaken by Development Planning Limited dated September 2019 and was included as part of the EIA Scoping Request which was submitted to Doncaster Council on 24 September. A copy is included within Appendix 7. The Assessment Scoping sets out how the highways assessment will be undertaken. It includes full details of route choices and the traffic generation within the appendices. Initial discussions have taken place with Highways England and a copy has been sent to them for consideration in order to agree the scope of the Traffic Assessment, including the junctions which are to be analysed. Contact has also been made with Doncaster Council Highways Department to agree the objectives of the Transport Assessment. Overall it is considered that subject to the necessary Transport Assessments and modelling it is highly likely that an appropriate solution to highways capacity can be reached. Public Open Space We note that Bradholme Farm, Site 160 has a neutral score for criterion 7(Ai) within the Sustainability Appraisal. The illustrative masterplan included within Appendix 8 shows a significant areas of public open space within the site. Given the site is considered to include public open space within the site boundary, this score should be positive. Ecology For criterion 12(Ai) of the Council's Sustainability Appraisal, Bradholme Farm, Site 160 scores a negative rating. From an ecological perspective there are no Statutory Designated Sites within the site boundary. There are three Statutory Designated Sites of International nature conservation interest within proximity. Thorne & Hatfield Moors Special Protection Area (SPA), Thorne Moor Special Area of Conservation (SAC) and Hatfield Moor SAC, which both form part of the SPA. Thorne Moor lies 2.9km to the north east and Hatfield Moor 2.9km to the south east of the site. There is only one Statutory Designated Site of National nature conservation interest, Bunting's Wood, Thorne Local Nature Reserve (LNR) which lies 1.0km to the north west of the proposed development site. In line with the NPPF (paragraph 170) the development of the site will seek to minimise impacts on and provide net gains for biodiversity. To date there has been ecological input into the illustrative masterplan to ensure that mitigation is built-in to the proposed development design to retain key features, such as ditches, hedgerows and mature trees. The ecological effects are to be avoided as far as possible. Additional mitigation measures that may be required includes: - protection of ditches, hedgerows and trees during construction (e.g. with temporary fencing); - new habitat creation within the development, e.g. hedgerows, wildflower meadow, native tree and shrub planting and wetland creation; - measures to avoid direct impacts to protected species; e.g. undertaking vegetation clearance outside bird nesting season utilising method statements where required; - minimisation of lighting during construction (e.g. using low-level motion-activated security lighting) and ecological input to development lighting design to minimise impacts to bats and other nocturnal species; and - Provision of features to benefit protected and notable species such as bird and bat boxes. We
note that the previous application at Bradholme Farm ref: 08/03189/FULM received a positive response from Natural England with regard to the proposed biodiversity improvements. The principles applied to the previous application will be applied to the forthcoming planning application Given that there is potential for a range of biodiversity improvements we consider that Site 160, Bradholme Farm should have a positive score for Biodiversity. Landscape The Sustainability Appraisal rates Bradholme Farm, Site 160 neutrally in relation to landscape capacity (criterion 12Bi). The 2008 application (ref: 08/03189/FULM) for this site included an assessment which took into the Landscape Character Assessment and Capacity Study of 2007 which concluded that the capacity of this area for strategic employment development is generally limited. The assessment submitted in support of the application included a detailed survey of the specific area within a 5 kilometre radius of the site. The report demonstrated the capacity in this location is higher than the general area, due to disturbed and degraded elements of the landscape not typical of the landscape character area as a whole. Large scale built development and disturbance associated with the motorways is found on the edge of Thorne in the immediate vicinity of the site. It was accepted that the development proposed as part of the 2008 application would not be noticeably harmful to the generally undeveloped rural character of the area beyond, nor would it encroach into the intact farmland buffer zone around Thorne and Hatfield Moors. A copy of the Officer Report confirming the acceptance of the assessment in support of the 2008 application is included within Appendix 10. We note that the Council is still referring to the Landscape Character Assessment and Capacity Study of 2007 within the evidence base for the Publication Draft and therefore consider that the assessment undertaken as part of the 2008 application still stands: the capacity in this location is higher than the general area, due to disturbed and degraded elements of the landscape not typical of the landscape character area as a whole. The development of the site can be designed to incorporate mitigation measures such as coloured cladding to enable better assimilation into the background, fringing trees would be species native to the area and would soften, though not screen, the mass of the buildings. New areas of biodiversity would be included. Minerals We note that Bradholme Farm has been given a’?’ rating in relation to criterion 14 A(i) Minerals sterilisation on the Sustainability Appraisal. A Mining and Minerals Report was included within the planning application ref: 08/03189/FULM. This report identified that the thicknesses and lateral consistency of the deposits under Bradholme Farm are irregular, and together with an unfavourable overburden to mineral ratio, the deposits are not viable for commercial extraction. Over time three separate aggregate companies have surveyed the site and decided not to pursue further investigations. A copy of the Minerals and Mining Report is included within Appendix 10 for reference. We therefore consider that Site 160, Bradholme Farm should be rated positively in relation to criterion 14 A(i). Agricultural Land Criterion 14 A(ii) of the Sustainability Appraisal relates to best and most versatile agricultural land. We note that Bradholme Farm has been given a negative rating. This is despite the availability of an Agricultural Land Assessment by Agricultural Systems Analysis Limited from a previous application (ref: 08/03189/FULM) on this site. A copy of this report is included within Appendix 11 and the relevant illustrations are included below. The assessment identifies that the majority of the site has little agricultural potential, with 85% of the site assessed as subgrade 3b. (SEE EMAIL FOR Figure 1 Agricultural Land Classification Maps - Bradholme Farm) Survey work involved the examination of auger borings on a 100 metre grid and by examination of 1.5 metre deep soil profile pits, to ascertain stoniness subsoil structure and drainage class. The site is mainly composed of heavy clay loams, falling within similar severe wetness class grade IV, limiting the majority of the site to Grade 3b. We also note the officer’s report from the previous application (ref: 08/03189/FULM) concluded: “the application site comprises mainly Grade 3b agricultural land (according to the DEFRA classification) with approximately 12 hectares of Grade 3a. The loss of the better quality land is not assessed as significant bearing in mind that the capital accrued from the sale of the land will enable the farming business to re-invest in other more appropriate land. Moreover the topsoil from the better quality land would be re-used on and off the site”. All necessary additional information, including if required a Soil Management Plan will therefore be submitted as part of a forthcoming planning application. It is not considered that any potential significant effects will arise from the loss of agricultural land as part of the development of Gateway 180. (SEE SERVER FOR Appendices)

Summary:

Gateway 160, Bradholme Farm 160 Concluded that the merits and support for Site 160 have not been considered in significant detail. Site 001 has more serious constraints and is not the most suitable or sustainable site for employment near to Thorne. Site 160 was originally allocated as an employment site but has since been deselected. The basis being the amount of public objections which are not themselves supported by material planning considerations or ones which carry a significant weight. This displays weaknesses in the Council’s site selection methodology. Site 160 is now in the control of Harworth Group Plc which has significant experience in delivering large strategic employment sites. Flood risk Site 160 has been given a negative score under Criterion 11 Ai. Although much of the site is shown as Flood Zone 3 on the EA’s flood map, the EA, IDB and LLFA have confirmed that the site is located outside of the area at risk of flooding from main rivers and that the main source of flood risk is due to the potential failure of a pumping station. The development of the site will not result in any loss of floodplain and will not increase flood risk elsewhere. There is no requirement for any floodplain compensation. The site should be scored as positive or neutral for Criteria 11 Ai. Site 160 has been given a negative score for Criteria 11 Aii - Areas benefiting from Flood Defences. Assume this is based on the SFRA or simple flood risk zone rating and takes no account of site specific FRA work past and current. It does not take account of the mitigating effect of barriers and distance between the site and the River Don. Site 160 does benefit from flood risk defences relating land drainage. The site should be scored as neutral. This has been raised previously and it is worrying that this information has not been considered as part of the SA process which demonstrates flaws in the Council’s evidence base. Accessibility This is supported by an Accessibility Review prepared by Development Planning Limited. Site 160 scores relatively well within the Sustainability Appraisal. Agree with the rating of criterion 3(Ai) and 3(Aiii) but disagree with the neutral score for criterion 3Aiii). The site benefits from bus routes 8, 8A and 84 passing the site and the services provide an approximate hourly frequency of buses in both directions. Consider that Site 160 should have a positive score for criteria 3Aiii) as there are a number of bus services which pass the site. Site 160 is significantly more accessible and sustainable than Site 001. Highways Site 160 is scored as negative within criterion BAI. Additional work has been prepared by Development Planning Ltd. It considers the existing and forecast local transport environment and potential implications of a mixed use employment scheme. It identifies that M18 Junction 5 has strategic importance for access to the site and also in terms of its inter-urban connections across the region. M18 Junction 5 was improved in 2015 as part of a Highways Agency funding scheme. The Transport Assessment for the Unity development forecasts that, with the exception of the Unity site access ("MOTO") arm of the roundabout, the fully improved M18 Junction 5 could operate satisfactorily in 2038. The 2008 Transport Assessment for Bradholme Farm forecast that the improvements proposed at M18 Junction 5 for the Hatfield Colliery site could accommodate the development proposals with no further improvement. It should be noted that the 2008 Transport Assessment for Bradholme Farm considered as part of application ref. 08/03189/FULM forecast that two additional local junctions could require signalisation as part of the development proposals. The Officers Report for the previous application for Bradholme farm in 2008 stated that there ref. 08/03189/FULM at Bradholme Farm states that: "subject to the improvements referred to both Junction 5 and the slip roads at Junction 1 of the M180 are able to accommodate the traffic from the proposed development." Therefore there are no significant issues in relation to highways capacity in relation to this proposal. A new B8 proposal could result in a similar conclusion or marginal additional traffic impact. The traffic generation from a B2 land use is higher than that for a B8 land use and, as such, a predominantly B2 proposal could result in additional offsite highway works being required. All traffic impacts would need to be modelled in detail. The Technical Note in relation to junction 1 of the M180 identifies that a previous traffic study for the site provided a forecast traffic
distribution of 90% of light vehicles and up to 100% of heavy vehicles being likely to route to the west of the site on the M180, or to local destinations via local routes to the north or south of the site. The residual (circa) 10% of vehicles which were forecast to travel to the east of the site are likely to use the A18, which provides a direct link to Scunthorpe (for light vehicles) and, also, provides access to the M180 (east) using the A161. Both the A18 and the A161 carry signs which confirm that they are recommended routes for goods vehicles. As such, if there are any HGV movements to or from the east they are able to access the M180 (east) using the A18. The forecast impact on the A18 is around one additional vehicle per minute during the peak hours. Such a small impact is likely to have a minimal or negligible impact on the operation of an ‘A’ classification road. A Transport Assessment Scoping has been undertaken by Development Planning Limited (Sept 2019) and was included as part of the EIA Scoping Request (submitted to the Council on 24 Sept 2019). A copy is included (Appendix 7). Overall it is highly likely that an appropriate solution to highways capacity can be reached. Public Open Space Site 160 has a neutral score for criterion 9Ai. The illustrative masterplan (Appendix 8) shows a significant areas of public open space within the centre of the site. It is considered that the score should be positive. Ecology Site 160 has a negative score for criterion 12Ai. There are no Statutory Designated Sites within the site boundary. There are three Statutory Designated Sites of International nature conservation interest within proximity. Thorne & Hatfield Moors Special Protection Area (SPA), Thorne Moor Special Area of Conservation (SAC) and Hatfield Moor SAC, which both form part of the SPA. There is only one Statutory Designated Site of National nature conservation interest, Bunting Wood, Thorne Local Nature Reserve (LNR) which lies 1.0km to the north west of the proposed development site. In line with the NPPF (para 170 d) the development of the site will seek to minimise impacts on and provide net gains for biodiversity. The illustrative masterplan shows that mitigation is built-in to the proposed development design to retain key features, such as ditches, hedgerows and mature trees. Additional mitigation measures that may be required include: - protection of ditches, hedgerows and trees during construction; - new habitat creation within the development, e.g. hedgerows, wildflower meadow; - measures to avoid direct impacts to protected species; - minimisation of lighting during construction; and - Provision of features to benefit protected and notable species. The previous planning application received a positive response from Natural England and the same principles will be applied to the forthcoming application. Consider that Site 160 should have a positive score for Biodiversity. Landscape Site 160 has a neutral score for criterion 12Bi. The 2008 application included an assessment taken from the 2008 Landscape Character Assessment and Capacity Study. The Study concluded that the capacity of this area for strategic employment development is generally limited. The Council is still referring to the Study within the evidence base for the Publication Draft, therefore the assessment undertaken as part of the 2008 application still stands: the capacity in this location is higher than the general area, due to disturbed and degraded elements of the landscape not typical of the landscape character area as a whole. The development of the site can be designed to incorporate mitigation measures and new areas of biodiversity would be included. Minerals Site 160 has been given a '?' rating for criterion 14 Ai. A Mining and Minerals Report (included with the 2008 planning application) (also in Appendix 10) identified that the thicknesses and lateral consistency of the deposits under the site are irregular and are not viable for commercial extraction. Three separate aggregate companies have surveyed the site and have decided not to pursue further investigations. Consider that the site should be rated positively in relation to criterion 14 Ai. Agricultural Land Site 160 has been given a negative rating for criterion 14 Aii. An Agricultural Land Assessment (Appendix 11) was submitted as part of the original planning application in 2008. It identifies that the majority of the site has little agricultural potential - 85% of the site is assessed as subgrade 3b. This was reflected in the officer’s report to the 2008 application. All necessary information will be submitted as part of a forthcoming planning application.

Response:

The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites. Detailed responses to the SA challenges are included in the Addendum to the SA Report published at Submission stage including revisions to criteria where appropriate in line with the Representation (Landscape, Agricultural Land, Ecology and, Minerals Sterilisation).
Policy 4 - Site 001 - Sustainability Appraisal Scores

3A(i) Access to train station
4.1 As stated in the attached report by Sanderson Associates (Appendix 1) and in our client's associated objection to the Site Selection Process, Thorne North is further than 1.2km of Thorne train station once practical walking distances are taken into account. 4.2 Furthermore, it is relevant to note that Thorne train station is served by an hourly train service that operates between Hull and Sheffield, via Doncaster. Between Doncaster and Thorne North, the service stops at Kirk Sandall and Hatfield & Stainforth only. Therefore, even if future occupiers of the Thorne North site were willing to walk or cycle to the train station, the available services are limited and are unlikely to be a viable option for most people; and will not necessarily provide a good and convenient means of accessing an employment site for a high proportion of the population, dependent very much on the location of stops and routes. 4.3 The neutral (yellow) score that has been awarded against this criterion should therefore be changed to a red (negative) score. 3A(ii) Distance to Bus Stop
4.4 Site 001 is located over 800m from a bus stop. Therefore, the negative red score currently provided for bus accessibility is considered to be correct. 4.5 It is noted that a number of planning applications have been submitted for the site (Applications No. 15/02252/OUTM & 16/02136/OUTM), which suggest that bus service improvements may be provided for the site, which could involve the diversion of the No. 87 bus service. However, the attached report by Sandersons (Appendix 1) notes that no details have been provided to confirm what, if any, bus service improvements would be delivered. Furthermore, it is noted that in the SYPT consultation response to planning application no. 15/02252/OUTM, it was confirmed that whilst a further diversion of bus service No. 87 (that currently diverts to The Range on Mount Pleasant Road twice per day) may be feasible, this service is not commercially viable and would require long term funding from the development. As such, Sandersons are of the view that the long-term viability of any bus service that may be re-routed to serve the site is not secure. 4.6 Sandersons further note that the No.87 bus service that the applicant has suggested may be diverted is made up of 3 bus routes (87, 87a and 87b) that serve different routes between Thorne and Doncaster. Therefore, the prospect of diverting multiple routes is unlikely and casts further doubt on whether a high frequency bus service could be provided for the development. 4.7 It is concluded by Sandersons that without evidence to the contrary, even with development S106 funding, Site 001 would not be served by a high-quality bus service; and therefore the negative bus accessibility is considered to be correct for this site. This is particularly so in the context for the need for a service to be self-funding when any developer subsidy is finished. Overall SA Scoring
4.8 The Site Selection Report asserts that Site 001 scores similarly to other scores through the SA process. However, the revised SA scores provided in the attached report by Sandersons indicates that there are considerable differences between Site 001 and West Moor Park East (Site 937/1031/938/1014) in respect of accessibility - as shown by the extract from the Sandersons report below. Site: 937/1031 West Moor Park East Train Accessibility: N/A Bus Accessibility: + Cycle Accessibility: 0 Road Access: + Ability to minimise travel to work distances: 0 Site: 001 Thorne North Train Accessibility: - Bus Accessibility: - Cycle Accessibility: 0 Road Access: + Ability to minimise travel to work distances: - Site: 092 Balby Carr Bank Train Accessibility: - Bus Accessibility: - Cycle Accessibility: 0 Road Access: 0 Ability to minimise travel to work distances: + Site: 441 Carcroft Common Train Accessibility: 0 Bus Accessibility: 0 Cycle Accessibility: 0 Road Access: 0 Ability to minimise travel to work distances: + Site: 878/1032 Rossington Train Accessibility: N/A Bus Accessibility: + Cycle Accessibility: 0 Road Access: 0 Ability to minimise travel to work distances: + Site: 941 Poplars Farm Train Accessibility: - Bus Accessibility: 0 Cycle Accessibility: 0 Road Access: 0 Ability to minimise travel to work distances: 0 4.9 In our client's associated objection to the Site Selection process we also demonstrate that there are material differences between Site 001 and West Moor Park East in respect of other SA criteria, with the latter site performing better overall. 4.10 In the light of the above, we consider that the SA process does not support allocation of Site 001 in preference to West Moor Park East. The proposed allocation of Site 001 is not justified in that regard. (SEE SUPPORTING DOCS for Appendices)

Summary:
Policy 4 - Site 001 - Sustainability Appraisal Scores
A(i) Access to train station
Thorne North is further than 1.2km of Thorne train station once practical walking distances are taken into account. The station is served by an hourly train service that operates between Hull and Sheffield, via Doncaster. Between Doncaster and Thorne North, the service stops at Kirk Sandall and Hatfield & Stainforth only. Services are limited and unlikely to be a viable option. This is not a good and convenient means of accessing an employment site for a high proportion of the population. The neutral (yellow) score should be changed to a red (negative) score. 3A(ii) Distance to Bus Stop
Site 001 is located over 800m from a bus stop. Therefore, the negative red score currently provided for bus accessibility is correct. Two planning applications have been submitted for the site (Applications No. 15/02252/OUTM & 16/02136/OUTM) and they suggest that bus service improvements could involve the diversion of the No. 87 bus service. It is noted that no details have been provided to confirm what improvements could be delivered. The SYPT consultation response to planning application no. 15/02252/OUTM says that whilst a diversion of service No. 87 may be feasible it is not commercially viable and would require long term funding. It is also noted that the applicant has suggested that the diversion could be made up of 3 bus routes (87, 87a and 87b). The prospect of diverting multiple routes is unlikely and casts further doubt on whether a high frequency bus service could be provided for the development. It is concluded that even with development S106 funding, Site 001 would not be served by a high-quality bus service. The negative bus accessibility score is correct for the site. Overall SA Scoring
The Site Selection Report says that Site 001 scores similarly to other scores through the SA process. However, the suggested revised SA scores indicate that there are considerable differences between Site 001 and West Moor Park East (Site 937/1031/938/1014) in respect of accessibility - see below: Site: 937/1031 West Moor Park East Train Accessibility:
N/A Bus Accessibility: + Cycle Accessibility: 0 Road Access: + Ability to minimise travel to work distances: + Site: 001 Thorne North Train
Accessibility: - Bus Accessibility: - Cycle Accessibility: 0 Road Access: + Ability to minimise travel to work distances: - Site: 092 Balby Carr Bank
Train Accessibility: - Bus Accessibility: 0/+ Cycle Accessibility: 0 Road Access: 0 Ability to minimise travel to work distances: + Site:
878/1032 Rossington Train Accessibility: N/A Bus Accessibility: + Cycle Accessibility: 0 Road Access: 0 Ability to minimise travel to work distances:
+ Site: 941 Poplars Farm Train Accessibility: - Bus Accessibility: 0 Cycle Accessibility: 0 Road Access: 0/+ Ability to minimise travel to work
distances: 0 The SA process does not support allocation of Site 001 in preference to West Moor Park East. The proposed allocation of Site 001 is not justified.

Response:

Responses to Representations in respect to SA are set out in the Wood Environment & Infrastructure SA Report Addendum. The SA scoring
process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites. The Housing and Employment Site Selection and Result Report provides further information. The Housing and Employment Site Selection Methodology and Results Report sets out the reasoning for sites being allocated or rejected to support jobs growth and economic ambitions. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites.

| CUSREF: | 05197 | Name: | Peacock And Smith |
| Date: | 30/09/2019 | Organisation: | Peacock and Smith |
| Representing: | | | Blue Anchor Leisure Limited |

Comment Ref: Policy 4:Site 441:SA/05197/1/029

Attend Examination: Attend Hearing

Reason: We have compiled a detailed submission which is underpinned by a number of technical and evidence-based studies. We consider that it will be necessary to discuss this evidence with Officers and the Inspector at the Examination.

Area: Sustainability Appraisal

Policy: Sustainability Appraisal

Tests of Soundness: Positively prepared Effective

Justified Consistent with national

Comment:

Policy 4 - Site 441 - Inaccurate Sustainability Score 4.1 As stated in the attached report by Sanderson Associates (Appendix 1) and in our client’s associated objection to the Site Selection Process, no evidence has been provided that Site 441 would be within a safe 400m walk from high frequency bus services. Existing footways between the site and bus stops on Doncaster Road (Services 405, 408 and 409) are narrow and there is a lack of safe crossing facilities on Doncaster Road. 4.2 There is an additional bus service (No. 412) on Doncaster Road that provides access to Carcroft. However, this only runs very infrequently (3 services during weekdays). Therefore, the bus accessibility to the residential population is inadequate. Given that one of the reasons for the Council proposing to allocate the site is that it will benefit the local community, this lack of bus access to Carcroft is a constraint. 4.3 In the absence of evidence to demonstrate that Site 441 could access high frequency bus services safely we consider that the SA score awarded to the site under Criterion 3A(ii) should be amended from a light green positive score to a neutral orange score. (SEE SUPPORTING DOCS for Appendices)

Summary:

Policy 4 - Site 441 - Inaccurate Sustainability Score There is no evidence that Site 441 is a safe 400m walk from high frequency bus services. The existing footways are narrow and there is a lack of safe crossing facilities. The additional bus service (No. 412) provides access to Carcroft but it runs very infrequently (3 services during weekdays). Bus accessibility is inadequate and is a constraint. The SA score under Criterion 3A(ii) should be amended from a light green positive score to a neutral orange score.

Response:

Responses to Representations in respect to SA are set out in the Wood Environment & Infrastructure SA Report Addendum. The Housing and Employment Site Selection and Result Report provides further information. The Sustainability Appraisal process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites.
Comment Ref: C/Site 001: SA/05197/1/004
Attend Examination: Attend Hearing
Reason: We have compiled a detailed submission which is underpinned by a number of technical and evidence-based studies. We consider that it will be necessary to discuss this evidence with Officers and the Inspector at the Examination.
Area: Sustainability Appraisal
Policy: Sustainability Appraisal

Tests of Soundness: Positively prepared Effective
Justified Consistent with national

Comment:

Site Selection - Inaccurate Sustainability Appraisal Scores for Thorne North (Site 001) 4.1 Notwithstanding the concerns regarding the SA appraisal approach relating to public transport accessibility, which are detailed in the attached Sandersons Associates report (Appendix 1), there are also inaccuracies in the scoring of the Council’s assessment for a number of employment site options. These are set out below. Thorne North (Site 001) 4.2 3A(i) Access to train station - Thorne North is further than 1.2km of Thorne train station once practical walking distances are taken into account. 4.3 Furthermore, is it relevant to note that Thorne train station is served by an hourly train service that operates between Hull and Sheffield, via Doncaster. Between Doncaster and Thorne North, the service stops at Kirk Sandall and Hatfield & Stainforth only. Therefore, even if future occupiers of the Thorne North site were willing to walk or cycle to the train station, the available services are limited and are unlikely to be a viable option for most people; and will not necessarily provide a good and convenient means of accessing an employment site for a high proportion of the population, dependent very much on the location of stops and routes. 4.4 The neutral (orange) score that has been awarded against this criterion should therefore be changed to a red (negative) score. (SEE SUPPORTING DOCS for Appendices)

Summary:

Site Selection - Inaccurate Sustainability Appraisal Scores for Thorne North (Site 001) There are also inaccuracies in the coring of other employment site options. For Thorne North and SA objective 3A(i) Access to train station, the site (001) is further than 1.2km from Thorne train station once practical walking distances are taken into account. This station is served by an hourly train service that operates

Response:

Responses to Representations in respect to SA are set out in the Wood Environment & Infrastructure SA Report Addendum. The SA scoring process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites. The Housing and Employment Site Selection and Result Report provides further information.
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<thead>
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<th><strong>Comment Ref:</strong></th>
<th>C/Site 092: SA/05197/1/005</th>
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<td><strong>Attend Examination:</strong></td>
<td>Attend Hearing</td>
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<tr>
<td><strong>Reason:</strong></td>
<td>We have compiled a detailed submission which is underpinned by a number of technical and evidence-based studies. We consider that it will be necessary to discuss this evidence with Officers and the Inspector at the Examination.</td>
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<td><strong>Area:</strong></td>
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<td><strong>Policy:</strong></td>
<td>Sustainability Appraisal</td>
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<td>Positively prepared</td>
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<td><strong>Comment:</strong></td>
<td>Site Selection - Inaccurate Sustainability Appraisal Scores for Balby Carr Bank (Site 092) 4.1 Notwithstanding the concerns regarding the SA appraisal approach relating to public transport accessibility, which are detailed in the attached Sandersons Associates report (Appendix 1), there are also inaccuracies in the scoring of the Council's assessment for a number of employment site options. These are set out below. Balby Carr Bank (Site 092) 4.5 3A(ii) Access to bus services - the bus services along Balby Carr Bank are not high frequency services, which is a requirement of the criterion. The nearest high frequency bus stops are approximately 700m from Site 092 and therefore this site should be awarded a neutral (orange) score rather than the light green positive score in the Council's SA. (SEE SUPPORTING DOCS for Appendices)</td>
</tr>
<tr>
<td><strong>Summary:</strong></td>
<td>Site Selection - Inaccurate Sustainability Appraisal Scores for Balby Carr Bank (Site 092) Balby Carr Bank (site 092) also has inaccuracies for the SA criterion for A(ii) Access to bus services. The bus services along Balby Carr Bank are not high frequency, which is a requirement of the criterion. The nearest high frequency bus stops are 700m from the site. This site should be awarded a neutral (orange) score rather than a green positive score.</td>
</tr>
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<td><strong>Response:</strong></td>
<td>Responses to Representations in respect to SA are set out in the Wood Environment &amp; Infrastructure SA Report Addendum. The SA scoring process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites.</td>
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Comment Ref: C/Site 441: SA/05197/1/006

Attend Examination: Attend Hearing

Reason: We have compiled a detailed submission which is underpinned by a number of technical and evidence-based studies. We consider that it will be necessary to discuss this evidence with Officers and the Inspector at the Examination.

Area: Sustainability Appraisal

Policy: Sustainability Appraisal

Tests of Soundness: Positively prepared Justified Effective Consistent with national

Comment:
Site Selection - Inaccurate Sustainability Appraisal Scores for Carcroft Common (Site 441) 4.1 Notwithstanding the concerns regarding the SA appraisal approach relating to public transport accessibility, which are detailed in the attached Sandersons Associates report (Appendix 1), there are also inaccuracies in the scoring of the Council's assessment for a number of employment site options. These are set out below. Land at Carcroft Common (Site 441) 4.6 3A(ii) Access to bus services - no evidence has been provided that Site 441 would be within a safe 400m walk from high frequency bus services. The light green positive score awarded in the Council's SA should therefore be amended to a neutral (orange) score. (SEE SUPPORTING DOCS for Appendices)

Summary:
Site Selection - Inaccurate Sustainability Appraisal Scores for Carcroft Common (Site 441)

Response:
Responses to Representations in respect to SA are set out in the Wood Environment & Infrastructure SA Report Addendum. The SA scoring process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites. The Housing and Employment Site Selection and Result Report provides further information.
Site Selection - Inaccurate Sustainability Appraisal Scores for Land East of Poplars Farm, Auckley (Site 941)  

4.1 Notwithstanding the concerns regarding the SA appraisal approach relating to public transport accessibility, which are detailed in the attached Sandersons Associates report (Appendix 1), there are also inaccuracies in the scoring of the Council’s assessment for a number of employment site options. These are set out below. Site 2, Land east of Poplars Farm, Auckley (Site 941)  

4.7 3A(ii) Access to bus services - the bus services that operate along A638 Great North Road do not represent a high frequency service. As explained in the attached report by Sanderson Associates (Appendix 1), this is confirmed in the Local Highway Authority consultation responses to the pending planning application for Site 941, where the highways officer has commented that the services are not regarded as high frequency.  

4.8 The walking distance to the bus stops on the A638, close to the junction with High Common Lane, are approximately 500m from the proposed access junction for Site 941 and this walking distance will increase as a result of a new roundabout access. The site should therefore be awarded a neutral (orange) score rather than the light green positive score in the Council’s SA. (SEE SUPPORTING DOCS for Appendices)
We have compiled a detailed submission which is underpinned by a number of technical and evidence-based studies. We consider that it will be necessary to discuss this evidence with Officers and the Inspector at the Examination.

We are concerned that the absence of consideration of the available local labour pool for employment site options is a major omission in the site selection exercise that has been carried out by the Council. At Paras 3.5 to 3.8 of the attached Sanderson Associates report (Appendix 1) we provide data on the available population (existing and proposed) within 8km/5 miles of key proposed allocations. This shows that the employment option at West Moor Park East is ranked second out of five sites - Sandersons conclude that the site is well located to a large residential population, which will allow development at the site to minimise travel distances before any regard is taken of public transport and bus improvements. (ii) Scoping out of Economic and Growth Criterion for Employment Options 2.4 Appendix A3 of the Housing and Employment Site Selection Methodology Report indicates that economic and growth criteria have been removed from the SA of employment sites, but this seems an illogical decision when considering the relative merits of different options for the economy and job creation of Doncaster. Para 32 of the NPPF indicates that SA should consider opportunities for net gains in economic objectives. 2.5 Some sites will clearly have greater potential than others for economic benefits to Doncaster and it should be possible to differentiate those that would result in more modest positive effects and those that could give rise to significant positive impacts. As demonstrated by Dove Haigh Phillips, some sites due to their location and characteristics are not likely to be attractive to the market and will not deliver development or at least not at the rate the Local Plan suggests. This is a significant factor that goes to the ability to deliver and achieve the benefits and objectives of the Plan. If a site will not be able to deliver the benefits associated with the development suggested, this is highly relevant when taking account of the harm associated with its development in order to determine the soundness, justified and effective nature of the Plan when compared to reasonable alternatives. (iii) Unnecessary Consideration of Access to Centre for Employment Options 2.6 Criteria 3B(i) seeks to compare the relative accessibility of employment options to defined shopping centres. Whilst we agree that this is relevant to how easily occupants of housing sites will be able to meet everyday shopping and service needs, we do not consider that this is a relevant criterion when considering the sustainability of an employment option. 2.7 The larger scale allocations of the plan are likely to have ancillary on-site Class A3/A4/A5 facilities and many businesses have in-house canteens in order to reduce the need for employees to leave the site to obtain lunch for example. Most industrial estates are also visited by mobile catering companies where such facilities are not available or insufficient to meet demand. The accessibility of an employment site to a defined shopping centre is not therefore an important or relevant guide to its overall sustainability. (iv) Arbitrary Flood Risk Threshold 2.8 Appendix A3 of the Housing and Employment Site Selection Methodology Report confirms that the Council has scored all sites with 20% or greater in FZ3a with a negative score (11A(i)). However, the rationale for a threshold as low as this is not justified, and we do not agree that this is a sound way of comparing the relative sensitivity of sites to flood risk or for directing as much development as possible to the lowest zones of flood risk - which is the overriding objective of the sequential test. Para 158 of the NPPF states that: "Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding." 2.9 By way of example, 54% (48.6 hectares) of West Moor Park East (Site 937/1031/938/1014 (note 1 - 1 Please note that since submission of representations in respect of the October 2018 Local Plan Consultation the site boundary of West Moor Park East has been expanded to include Site 938/1014 - please see associated representations in respect of Policy 4)) is located in F21, with the remaining being located in F23a and F22. However, this site is awarded (in the Council SA) the same negative (pink) score as sites 001 and 441, 100% of which are in F23a. The total Local Plan contribution of Site 001 is 5.14 hectares and therefore nearly all of it could be provided within F21 at West Moor Park East. The total Local Plan contribution of Site 441 is 12.32 hectares and therefore all of it could be easily provided within F21 at West Moor Park East. 2.10 In the light of the sequential test it is therefore illogical and unsound for the SA to treat all sites with 20% or greater in F23a with the same negative score. We consider that the binary nature of Criterion (11A(i)) should be amended to one that allows employment sites with a significant proportion within F21 to be awarded higher scores than those that are wholly or substantially in zones of higher flood risk. (v) Consideration of Details of Public Transport Improvements by Site Promoters 2.11 Para 6.2.3 of the Housing and Employment Site Selection Methodology Report notes that where robust evidence has been provided by site promoters SA scores have been revised in order to give a post mitigation score for findings and criteria specific to the site. However, we are concerned that this exercise does not appear to have been undertaken in a complete manner, particularly in the case of West Moor Park East (Site 937/1031/938/1014). 2.12 At the 2018 Informal Draft Local Plan consultation stage Blue Anchor Leisure submitted a package of information specific to West Moor Park East, including written confirmation with costs from First Bus that an existing frequent bus route (Service 15) can be extended into the site; and that this service could become viable after five years without subsidy. However, there is no indication from Appendix S of the August 2019 SA that this
information has resulted in changes to the SA scores. By way of example, the extension of the 15 Service frequent bus route into the site should result in a green score in relation to ‘distance to bus stop (3A(ii))’ as this would result in a stop within centre of the proposed development, but West Moor Park East is currently awarded a pink (negative) score. 2.13 We consider that the relative accessibility of employment site options to high frequency bus services is of greater importance than the access to train services criterion included in the SA. As explained at Paras 4.4.1 to 4.2.3 of the attached report by Sanderson Associates (Appendix 1), a train service will not necessarily provide a good and convenient means of accessing an employment site for a high proportion of the population as it may dependant on the location of train routes and stations. 2.14 Consideration of Importance of Nature Conservation Site and Potential for Mitigation in Biodiversity Criterion 2.14 Appendix A3 of the Housing and Employment Site Selection Methodology Report indicates that under criterion 12A(i) all sites that overlay in (part or whole) a defined wildlife site will be awarded a double negative (red) score irrespective of the importance of the designation or the scope for mitigation. In our view this is an unsophisticated and crude approach to assessment of the biodiversity impact of employment sites. 2.15 Para 171 of the NPPF states that plans should distinguish between the hierarchy of international, national and locally designated sites and allocate land with least environmental value. However, at present criterion 12A(i) would award the same score to a site that overlays a local wildlife site (even if that overlay were on a very small area of the site in question) to one that fully overlays a SSSI or SAC, contrary to national policy. There is also no attempt within the SA to differentiate the degree of harm to the designation, taking into account the amount of overlap with the designation. 2.16 We are also concerned that there is no consideration of the likely actual impact on designated sites where a site promoter has supplied appropriate mitigation/enhancement information to the Council. In the case of West Moor Park East (Site 937/1031/938/1014), the SA makes reference to the fact that the site incorporates a small local wildlife site, Holme Wood. However, the Vision Document provided in our client’s response to the 2018 Informal Draft Local Plan consultation (Appendix 5) not only shows that no employment development is proposed in that part of the site, but it also indicates that new vegetation and SUDS features would be provided to enhance the setting of Holme Wood and create new wildlife habitat. At present criterion 12A(i) does not allow these benefits to be reflected in a SA score. 2.17 We therefore consider that criterion 12A(i) should be amended to distinguish between the hierarchy of international, national and locally designated sites; the degree of harm to the designation; and to allow for mitigation/enhancement to be considered where site promoters have provided such information. (vii) Highways Capacity 2.18 The Highways Capacity for housing and employment options is considered in a separate SA Technical Appendix. However, as explained in the attached Technical Report by Sanderson Associates (Appendix 1), this relates to a very high-level assessment undertaken in 2015 of potential impacts on key junctions on the trunk road network only. No quantitative or qualitative assessment of the impact of allocations on the local road network has been undertaken. It is therefore considered that the scoring criterion is inaccurate and unreliable and it provides an insufficient basis upon which to consider operation to the highway network and access to employment sites. 2.19 In respect of West Moor Park East (Site 937/1031/938/1014), the attached Technical Note by Fore Consulting (Appendix 2) includes a capacity study that demonstrates that development of this option for employment use would give rise to traffic that can be satisfactorily accommodated at Junction 4 of the M18. The current main operation issues on the local highway network relate to traffic queuing back from roundabouts on the A630 West Moor Link at certain times. The West Moor Link improvement scheme (the first phase of which is already under construction) will resolve the existing queuing issues on the A630 and further improve the capacity and operation of key junctions along the A630 corridor. 2.20 Given the above, there is no justification for the current red (considerable traffic impact) ranking of West Moor Park East within the Council’s Highway’s Capacity Study. (SEE SUPPORTING DOCS for Appendices)

Summary:
1. Omission of consideration of availability of labour for employment options An essential driver of the attractiveness of an employment site is the availability of labour in the area. Occupiers wish to be close to an appropriate labour pool and strong communication links for the workforce. An available, skilled and mobile workforce is often a pre-requisite. This is not considered in the SA. The site selection process does not take into account one of the key objectives of local and national transport planning policy related to the need to minimise travel to work distances. The location of employment sites to the nearby residential population is a major influencing factor in reducing the need to travel. This is a major omission from the site selection process. Regarding location to available population, West Moor Park East is ranked second out of five sites. It is well located to a large residential population. 2. Scoping out of Economic and Growth Criterion for Employment Options Appendix A3 of the Site Selection Methodology Report indicates that economic and growth criteria have been removed from the SA of employment sites. This seems an illogical decision when considering the relative merits of different options for the economy and job creation. Para 32 of the NPPF indicates that SA should consider opportunities for net gains in economic objectives. Some sites have greater potential than others regarding economic benefits and it should be possible to differentiate that result in more modest positive effects and those that could give rise to significant positive impacts. Some sites are not attractive to the market and will not develop at the rate the local plan suggests. This is highly relevant for determining the soundness, justified and effective nature of the plan. 3. Unnecessary Consideration of Access to Centre for Employment Options Criterion 3B1 compares the accessibility of employment options to defined shopping centres. Agree this is relevant for assessing housing sites, but it is not relevant when considering employment sites. The larger scale allocations are likely to have ancillary on-site Class A3/A4/A5 facilities and many businesses have in-house canteens in order to reduce the need for employees to leave the site to obtain lunch. Most industrial estates are also visited by mobile catering companies. This criterion is not important or relevant. 4. Arbitrary Flood Risk Threshold Appendix A3 of the Site Selection Methodology Report confirms that all sites with 20% or greater in FZ3a have been given a negative score (for 11A1). The rationale for a low threshold is not justified, and it is not agreed that this is a sound way of comparing the relative sensitivity of sites to flood risk or for directing as much development as possible to the lowest zones of flood risk - which is the overriding objective of the sequential test. Para 158 of the NPPF states that: "Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding." By way of example, 54% (48.6 hectares) of West Moor Park East is located in FZ1, with the remainder being located in FZ3a and F22. However, this site is awarded (in the Council SA) the same negative (pink) score as sites 001 and 441, 100% of which are in FZ3a. The total Local Plan contribution of Site 001 is 51.54 hectares and therefore nearly all of it could be provided within FZ1 at West Moor Park East. The total Local Plan Contribution of Site 441 is 12.32 hectares and therefore all of it could be easily provided within FZ1 at West Moor Park East. It is illogical and unsound for the SA to treat all sites with 20% or greater in FZ3a with the same negative score. The binary nature of Criterion 11Ai should be amended to one that allows employment sites with a significant proportion within FZ1 to be awarded higher scores than those that are wholly or substantially in zones of higher flood risk. 5. Consideration of Details of Public Transport Improvements by Site Promoters Para 6.2.3 of the Site Selection Methodology Report notes that robust evidence has been provided by site promoters SA scores have been revised. This does not appear to have been undertaken for West Moor Park East. During the Informal consultation stage a package of information was submitted including confirmation from First Bus that an existing frequent bus route (Service 15) can be extended into the site. This service could then become viable after five years without subsidy. There is indication that this information has resulted in changes to the SA scores. This should result in a green score in relation to ‘distance to bus stop (3A(ii))’ as this would result in a stop within centre of the proposed development, but West Moor Park East is currently awarded a pink (negative) score. Consider that the relative accessibility of employment sites to high frequency bus services is of greater importance than the access to train services. A train service will not necessarily
provide a good and convenient means of accessing an employment site as it is dependant on the location of train routes and stations. 6. Consideration of Importance of Nature Conservation Site and Potential for Mitigation in Biodiversity Criterion Appendix A3 of the Site Selection Methodology Report indicates that under criterion 12Ai all sites that overlay (in part or whole) a defined wildlife site will be awarded a double negative (red) score irrespective of the importance of the designation or the scope for mitigation. This is an unsophisticated and crude approach as para 171 of the NPPF states that plans should distinguish between the hierarchy of international, national and locally designated sites and allocate land with least environmental value. At present, criteria 12Ai would award the same score to a site that overlays a local wildlife site to one that fully overlays a SSSI or SAC, contrary to national policy. There is no attempt within the SA to differentiate the degree of harm to the designation, taking into account the amount of overlap with the designation. Concerned that there is no consideration of the likely actual impact on designated sites where a site promoter has supplied appropriate mitigation/enhancement information to the Council. For West Moor Park East 4), the SA makes reference to the fact that the site incorporates a small local wildlife site, Holme Wood. However, the Vision Document provided in our client’s response to the 2018 Informal Draft Local Plan consultation not only shows that no employment development is proposed in that part of the site, but it also indicates that new vegetation and SUDs features would be provided to enhance the setting of Holme Wood and create new wildlife habitat. At present criterion 12Ai does not allow these benefits to be reflected in a SA score. Consider that criterion 12Ai should be amended to distinguish between the hierarchy of international, national and locally designated sites; the degree of harm to the designation; and to allow for mitigation/enhancement to be considered where site promoters have provided such information. 7. Highways Capacity The Highways Capacity for housing and employment options is considered in a separate SA Technical Appendix. However this relates to a very high-level assessment undertaken in 2015 of potential impacts on key junctions on the trunk road network only. No quantitative or qualitative assessment of the impact of allocations on the local road network has been undertaken. The scoring criterion is therefore inaccurate and unreliable and it provides an insufficient basis upon which to consider operation to the highway network and access to employment sites. Our capacity study demonstrates that development West Moor Park East would create traffic that can be satisfactorily accommodated at M18 Junction 4. The current main operation issues on the local highway network relate to traffic queuing back from roundabouts on the A630 West Moor Link at certain times. The West Moor Link improvement scheme (first phase is under construction) will resolve the existing queuing issues on the A630 and further improve the capacity and operation of key junctions along the A630 corridor. There is no justification for the current red ranking of West Moor Park East within the Council’s Highway’s Capacity Study.

Response:
Responses to Representations in respect to SA are set out in the Wood Environment & Infrastructure SA Report Addendum. The SA scoring process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites. The Housing and Employment Site Selection and Result Report provides further information.
We have compiled a detailed submission which is underpinned by a number of technical and evidence-based studies. We consider that it will be necessary to discuss this evidence with Officers and the Inspector at the Examination.

**Tests of Soundness:**
- Positively prepared
- Effective
- Justified
- Consistent with national

**Comment:**

Site Selection - Revised SA Scores in Light of Comments on SA Methodology and Council's Inaccurate SA Scores

5.1 We attach at Appendix 6 revised SA scores for West Moor Park East (Site 937/1031/938/1014) and the other sites we refer to under Issue 3 where we identify inaccurate scores that the Council has applied. 5.2 Whereas the Council’s site selection document asserts that Sites 001, 441 and West Moor Park East score similarly to other sites through the SA process, our revised scores show material differences between Site 001 and West Moor Park East in particular. West Moor Park East has more green scores than Site 001 (7 versus 4), less red scores than Site 001 (1 versus 1) and less pink scores than Site 001 (3 versus 6). 5.3 In our view this casts considerable doubt over the soundness of the Council's SA process as a way of informing the site selection process for employment site options. This is before assessment of the delivery of sites has been taken into account in terms of market attractiveness that would only serve to underscore these outcomes in favour of the West Moor Park East site. (SEE SUPPORTING DOCS for Appendices)

**Response:**

The SA scoring process has been undertaken using a standard approach which has been independently checked by Wood. It has used a consistent approach for all sites including flood risk. The Housing and Employment Site Selection and Result Report provides further information. The Addendum to the SA Report has also considered challenges to the SA scores with more detailed responses accordingly.
5.1 The omissions in the Sustainability Appraisal are not limited to the Site’s definition as Greenfield land in agricultural use. At part 3B) Accessibility to Local Services, the Site is marked ‘0’ for access, within 400m-800m to a neighbourhood shopping parade. The neighbourhood shopping parade in Auckley lies some 550m to the north of the Site. The score of ‘0’ is defined in the Sustainability Appraisal as ‘Neutral - Proposal is unlikely to create any significant effects (positive or negative) at present or in the future’. The score of ‘0’ for a site which plainly meets the 400m-800m requirement is difficult to reconcile. It is assumed this is another error within the report and the Site should score a ‘+’ ‘Positive effects - The proposal will have a positive effect on the SA Objective when compared to the current and future baseline conditions. Minor adverse effects may result but the overall effect will be positive.’ 5.2 Similarly, the Sustainability Appraisal scores the Site ‘0’ on proximity to a primary school (within 400m-800m). However, the Site lies within 600m of Hayfield Lane Primary School and 600m of Auckley Junior and Infant School. This clear omission is unexplained and is assumed to be an error. 5.3 The Local Planning Authority’s site selection process is reliant on the scoring in the Sustainability Appraisal. Where clear errors of scoring do occur, such as the case here, these errors feed into the allocations process. The errors in scoring therefore lead to a skewed site selection process which omit sites as being unsustainable when in fact they meet the assessment criteria. 5.4 The evidence base and Local Plan is therefore unjustified as it fails to consider reasonable alternatives.

Summary:
The omissions in the Sustainability Appraisal are not limited to the Site’s definition as Greenfield land in agricultural use. At part 3B) Accessibility to Local Services, the Site is marked ‘0’ for access, within 400m-800m to a neighbourhood shopping parade. The neighbourhood shopping parade in Auckley lies some 550m to the north of the Site. The score of ‘0’ is defined in the Sustainability Appraisal as ‘Neutral - Proposal is unlikely to create any significant effects (positive or negative) at present or in the future’. The score of ‘0’ for a site which plainly meets the 400m-800m requirement is difficult to reconcile. It is assumed this is another error within the report and the Site should score a ‘+’ ‘Positive effects - The proposal will have a positive effect on the SA Objective when compared to the current and future baseline conditions. Minor adverse effects may result but the overall effect will be positive.’ Similarly, the Sustainability Appraisal scores the Site ‘0’ on proximity to a primary school (within 400m-800m). However, the Site lies within 600m of Hayfield Lane Primary School and 600m of Auckley Junior and Infant School. This clear omission is unexplained and is assumed to be an error. The Local Planning Authority’s site selection process is reliant on the scoring in the Sustainability Appraisal. Where clear errors of scoring do occur, such as the case here, these errors feed into the allocations process. The errors in scoring therefore lead to a skewed site selection process which omit sites as being unsustainable when in fact they meet the assessment criteria. The evidence base and Local Plan is therefore unjustified as it fails to consider reasonable alternatives.

Response:
The Addendum to the SA Report published at Submission sets out responses to challenges to the SA.
3.1 The Site was previously in use as a sand and gravel quarry from the 1940s to the 1960s. The use of the quarry was discontinued in the 1960s and since then no activity or remediation has taken place. 3.2 Appearance 3.3 The quarry retains its artificial land features, where the excavation of the quarry is visible, in uniform parcels separated by raised paths/old roads formed by bunds. The top soil has been removed and very little ruderal vegetation is able to grow. The absence of any remediation since the discontinuance of the quarry renders the Site unsuitable for agriculture. 3.4 The uneven topography is itself an alien feature in the landscape, which is unlike any of the surrounding flat fields. The Site is plainly dissimilar to the surrounding landscape. The Site has not "blended into the landscape" (Note 1 - 1 See previously developed land definition, page 70 National Planning Policy Framework.) 3.5 The Site is well enclosed by boundary mature hedgerows and trees. There are limited views into the site from the roads (Hurst Lane and Mosham Road). 3.6 Conditions 3.7 We understand the quarry did not go through the Review of Old Minerals Permissions (ROMP) and no conditions regarding the remediation were ever attached to permissions for the Site (or if so are no longer enforceable). 3.8 In the absence of any conditions or other development management procedure making provision for the Site's restoration, the Site is 'previously developed land' as defined in the Glossary, Annexe 2 of the Framework. 3.9 Sustainability Appraisal / Strategic Environmental Assessment 3.10 The relevance and significance of whether the land is classified as previously developed land is evident in the Sustainability Appraisal, prepared by Wood Environment and Infrastructure Solutions UK Limited. The Site (ref: 446) is identified in the Appraisal section as being Greenfield, rather than Brownfield. In the assessment matrix, the Site is scored ‘0’ for being located on greenfield land that has not previously been developed. The commentary for the Site also states this is on Grade 3 agricultural land, but that it is not possible to ascertain whether this is best and most versatile land. The land is not in agricultural use and almost all of the topsoil has been stripped form the land. The Site is Previously Developed Land. As such the Sustainability Appraisal cannot be relied upon to give an accurate assessment of the Site's suitability and sustainability, while these errors remain uncorrected. 3.11 Assessment of Previously Developed Land Definition 3.12 There is an interesting history to the definition of PDL. The 7th March 2000 version of PPG3 contained a longer definition than appears in the current version of the Framework which appeared to have two tests. That formulation of language was considered by Mr Justice Sullivan in Dodds and Hands v Secretary of State for the Environment, Transport and the Regions [2002] EWHC 84 (Appendix A) Admin which found the "clear reason" that could outweigh the reuse of the site was a separate distinct test. Subsequently, the June 2011 version of PP33 dropped the second limb of the test but kept the same language in respect of the provisions relating to "blended into the Landscape in the process of time (to the extent that it can reasonably be considered as part of the natural surroundings)". The 2012 version of the Framework dropped the words in brackets from its predecessor definition. The 2018 version of the Framework dropped the words "in the process of time". The 2019 version maintains that wording, thus the present definition is "and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape". 3.13 The approach to the interpretation of PDL has been considered by the Courts on a number of occasions. This was recently considered in the Court of Appeal in Dartford Borough Council v Secretary of State for Communities and Local Government and others (2017) EWCA Civ 141 (Appendix B). Essentially the language is to be given its ordinary common sense meaning in context. There is no need to look at previous iterations of policy in order to understand the meaning of the language used in its current context. 3.14 The relevant context is that the current Framework provides significant emphasis and importance to the reuse of Previously Developed Land, especially in urban areas. Paragraph 118 (c) requires significant weight to be given to the value of using suitable brownfield land within settlements; paragraph 68 confirms the importance of using brownfield registers to identify housing land; paragraph 84 encourages the use of PDL for employment uses; even in the greenbelt paragraph 145(g) facilitates the complete redevelopment of PDL. 3.15 Although the language surrounding the concept of "blended into the landscape" has been reduced there is absolutely no reason to suppose that the trimming down of the language has altered its meaning or the policy. The fact that the phrase to the extent that it can be reasonably considered as part of the natural surroundings has been deleted does not alter its meaning. The words "blended into the landscape" must mean that a relevant site has blended into something to which it is adjacent ie, the surrounding landscape. This point has been before the Courts in R (Bristol City Council v First Secretary of State (i) and Edward Ware Urban Renewal Limited (ii) 2004 EWHC 1934 (Admin) (Appendix C). In that case an Inspector had referred to the fact that the subject site was within an urban area and that there are no natural surroundings". It was suggested by the Claimants (paragraph 16) that this was a misapplication of National Policy (then in Annex C PPG3) and was irrational. Mr Justice Sullivan dismisses the argument (see paragraphs 18 and 19) confirming that the test is "not to be applied in a mechanistic way". In concluding that there were no "natural surroundings" the Inspector had not been purporting to lay down some principle of general application but this was a factor that could be taken into account. The Court dismissed the challenge. 3.16 The phrase "permanent structure" is deliberately not confined to buildings. Thus, an artificial dome of a landfill or excavated quarry bottom and bunds would constitute such a structure in and of themselves, the latter remain readily apparent on the Site. 3.17 The Dodds and Hands case dealt with railway sidings. In Mrs Olive Mrs Edwards v Rhondda Cynon Taff County Borough Council [2014] UKUT 0435 (Appendix D) the Court considered whether a disused railway cutting would qualify under the PDL definition. In both cases it is clear that structures which create an artificial land form are plainly considered to qualify. A Secretary of State decision and Inspector's report (Appendix E and F) dealt with a former mineral site and the artificial structures of what remained qualified under the definition of PDL. Paragraphs 13.5 to 13.7 set out the Inspector's views on the nature of the site and whether it constituted PDL. In that case, there was a
significant amount of mounding, rubble and tracks on the site. Photographs showed extremely uneven land and lines of tracks. That site had a very unnatural and artificial landform as a result of its previous use. The mounding of the tracks were visible and had not blended into the landscape and bore no resemblance to any part of its surroundings. 3.18 The first relevant exclusion in the PDL definition is that the site is: "land that has been developed for mineral extraction or waste disposal by landfill, where provision for the restoration has been made through development management procedures." However, it appears that no conditions were imposed to ensure the remediation of the site and no ROMP took place here. The absence of any conditions or review of minerals permissions indicates there has been no development management procedures to restore this Site. This exclusion in the POL definition does not therefore apply to the Site. 3.19 Given the substantial amount of time since the cessation of quarrying activities to the present day, any residual or unidentified restoration requirements in a relevant planning permission, would be unenforceable. 3.20 The question then remains as to whether the site can be judged to have blended into the landscape. All of the cases referred to above provide discussion on this topic and do provide some helpful insights, but each case must be judged on its own merits. Ultimately, this is a matter of judgment for the decision maker. The bunds and excavations can clearly be seen on the Site which appear as an artificial and alien landform in the surrounding landscape. The vegetation which has grown is tall ruderal species, but with the majority of the site uncovered earth. The on-site views indicate a clearly artificial landscape which is distinct from surrounding fields and quarries and could not be said to have blended into the landscape. 3.21 The Sustainability Appraisal makes an erroneous reference to this Site being 'Greenfield' and to its agricultural land classification. The Sustainability Appraisal's assessment of this Site is not consistent with the Framework and is unsound for this reason.

Summary:
The quarry has been disused since the 1960s and no remediation has taken place. No remediation conditions, and even if so, unenforceable. Top soil removed and little vegetation able to grow. Site unsuitable for agriculture. Site is not blended into the landscape and sticks out. It is well bounded by physical features. SA states this is greenfield, but it scores '0' for this, and also that it is BMV agricultural land, but it is not possible to ascertain this. The SA can therefore not be relied on whilst errors remain uncorrected. Site does not meet with definitions of previously developed land. 2019 definition is: "land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape". This has been tested in the courts. National policy states brownfield development should be given substantial weight. The question for the decision maker is whether this site has blended back into the natural landscape. The bunds and excavations can clearly be seen on the Site which appear as an artificial and alien landform in the surrounding landscape. The vegetation which has grown is tall ruderal species, but with the majority of the site uncovered earth. The on-site views indicate a clearly artificial landscape which is distinct from surrounding fields and quarries and could not be said to have blended into the landscape.

Response:
The Addendum to the SA Report published at Submission sets out responses to challenges to the SA.
We are satisfied with the content of this topic paper, but have the following observations to make. We have also noted a number of minor/typing errors. Paragraph 1.2 There is a small typing error in this paragraph - 'Kaedby' should read Keadby. Paragraph 1.6 Main River Flooding The way this section is written makes it look like Flood Risk Zone 3b is part of the Environment Agency's Flood Map for Planning, which is not the case. Our flood map only defines three zones and does not separate flood zone 3 into 3a and 3b. We ask that it is made clearer that 3b is a designation derived from the Council's SFRAs and is not shown on our Flood Map for Planning. The way flood risk probability is communicated has subtly changed. We advise removing the word 'year' from the definition of probability. This has caused confusion for people in the past as they have an expectation that following a flood event, a further event would not happen for another '100' years. The definitions contained in the current PPG should be used (see 'Table 1: Flood Zones' in the Flood Risk and Coastal Change section). Figure 3 on page 3 Minor omission - the heading is incomplete - the year is missing. Figure 6 on page 6 The EA no longer has a Regional tier. The two EA water management areas are known as 'Yorkshire Area' and 'East Midlands Area'. We noted that there is no 'Figure 5' in the document so numbering may need to be updated. Paragraph 2.3 Minor typing error - "The sequential test is, in effect, is a sieving process" - suggest removing the second "is". Paragraphs 2.4 and 2.5. The Exception Test is referred to as singular in the NPPF. The section heading, and both paragraphs 2.4 and 2.5 refer to it as singular in some places, and plural in others. For consistency, "tests" should be amended to 'test'. Table 2 - EA Modelling Summary - Upper Humber Flood Risk Mapping Study DMBC District: River Don (downstream of the railway line Barnby Dun). Detail: This study follows a review of the Humber Flood Risk Management Strategy after tidal surge experienced in December 2013. The study builds upon previous work by improving understanding of tidal and fluvial interaction, floodplain interactions and the risk from defence breaches. Breach scenarios do not include an allowance for climate change. Timescales: Complete - Middle and Lower Don Modelling Study Detail: This project reviews the EA flood mapping (i.e. flood zones), investigates defended and undeclared scenarios, and takes account of the December 2016 climate change predictions. The defended model outputs have been signed off for use and the breach modelling has been scoped and is due to be run shortly. Timescales: Defended modelling now signed off for use. Breach modelling currently being scoped - The River Torne & Three Rivers Modelling Timescales: This modelling was completed in January 2019 and is now publicly available. Note - This modelling should be used in conjunction with the SFRAs and critical flood levels (CFL) when proposing finished floor levels. - The River Idle and River Ryton Timescales: Modelling is in the final stages and is programmed for delivery before the end of 2019. - The Isle of Axholme Flood Risk Management Strategy Timescales: The IoA FRMS was signed off by DEFRA in 2014. Note - A letter is due to be sent back to DEFRA imminently in 2019 detailing how the EA will continue to implement the recommendations of the IoA FRMS. Figure 8: Environment Agency Existing & Planned Flood Modelling Programmes We have requested an updated map from the team who produce it, but have not yet received it. We have requested this be produced as soon as possible and will send it to you as soon as it is available. Paragraph 3.5 - North Lincolnshire SFRA We are aware that North Lincolnshire Council (NLC) are currently carrying out a 'light touch' update to their SFRAs where they have lowered the FFL requirements to 4.1mAOD. This was due to the fact that the 4.1mAOD level already incorporated approximately 600mm of resilience to account for residual uncertainty and a further 300mm was added by NLC to be extra cautious. NLC have decided to remove the requirement for the further 300mm. We provided the council with our rationale behind the CFL by email on 16 September 2019. Paragraph 3.8 - Catchment Flood Management Plans Please note CFMPs are being replaced by Flood Risk Management Plans (FRMPs). Since the publication of FRMPs in 2016, CFMPs are no longer actively used within the EA as the policies and actions they contain are now considered to be out of date. The FRMPs are more relevant and up to date and these are now more widely used. Under the EU Floods Directive (2008), the EA is required to prepare FRMPs for flooding from main rivers, reservoirs and the sea, for all river basin districts in England, there are 10 altogether. LLFAs are required to prepare FRMPs for flooding from surface water, ordinary rivers and groundwater for areas with a significant risk of flooding. Paragraph 7.2 This paragraph states that all minerals developments all considered appropriate in all flood risk areas subject to passing the Sequential Test. It should be noted that whilst this true for flood zones 1, 2 and 3a, it is not the case for flood zone 3b where only sand and gravel workings (which are classified as water compatible) are considered appropriate. Paragraph 10.2, 1st bullet point refers to the Environment Agency "Yorkshire & Trent Regions", this should be amended to 'Yorkshire and East Midlands Areas'.
Tests of Soundness:

Comment:

2.1 Before commenting on individual draft policies, it is disappointing that a number of key evidence documents are not available as part of this consultation. There are a number of 'Topic Papers' that are referenced in the Publication Draft that are not yet available and will be issued at Plan Submission stage. This is not considered as acceptable as it fails to allow representors the opportunity to fully understand the evidence and justification behind the Council's approach in the Publication Draft. It is considered reasonable and fair that all the background evidence and Topic Papers which provide additional information regarding the content of the Publication Draft stage are made available at Publication Draft stage. The Topic Paper in relation to the distribution of the proposed housing requirement and the proposed requirement ranges is referred to in the Council's Consultation Summary of the 2018 Informal Consultation stating: "The Housing and Settlement Strategy Topic Paper (to be issued at Submission) will demonstrate a sound housing requirement has been identified, as proposed in Policy 3, to help deliver Policy 2." "The use of ranges will be explained in the Housing and Settlement Strategy Topic Paper (as an update to the Settlements Background Paper published alongside the 2018 Informal Consultation)." 2.2 An update to the Settlements Background Paper is a key piece of evidence that should be available at Publication stage for consideration alongside the Publication Draft policies. 2.3 A further evidence document that is not available relates to Flood Risk. The justifying text to Policy 2 adjacent to paragraph 4.17 informs that "A Topic Paper will be issued at Plan Submission explaining how the Council has considered the need to avoid flood risk where possible as part of Plan preparation." Over two fifths of the Borough is located within medium to high risk flooding areas, and the Sites and Policies DPD Inspector was concerned with the Council's weighing process which did not give due weight to flooding and was one of the reasons leading to the withdrawal of the Sites and Policies DPD. Given the clear issue of flood risk in the Borough it is surprising and unacceptable that this Topic Paper is not available at Publication Draft stage.

Summary:
It is disappointing that a number of key evidence documents are unavailable as part of this consultation. A number of topic papers are missing which is unacceptable as it does not allow consultees the opportunity to fully understand the evidence and justification for the approach. It is considered reasonable and fair that all the background evidence and Topic Papers are made available and Publication Draft stage. This is true of an update to the Settlements Background Paper and Flood Risk. The settlement background paper is a key piece of evidence and given the flood risk in the borough, it is surprising and unacceptable that the flood risk topic paper is unavailable.

Response:
Concerns are noted - the majority of the Topic Papers were available at both the 2018 informal consultation and Regulation 19. Agree that not all were published (e.g. flood risk) but contend that Topic Papers generally summarise existing evidence bases as opposed to providing new evidence in themselves.
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Response:
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## Site Selection - Absence of Comprehensive Update to Colliers Employment Land Review

7.1 We note that the Council’s evidence base includes an addendum to the Colliers Employment Land Review (February 2018) that has been produced in light of the 2018 Informal Draft Local Plan consultation. However, this is only a very selective update. For example, the Addendum does not update the assessment of West Moor Park East (Site 937/1031/938/1014) in the light of the substantive response to the 2018 Informal Draft Local Plan consultation provided by Blue Anchor Leisure, and the considerable consultation that has taken place between our client and the Council. 7.2 In the absence of such an update we do not consider that the assessment of West Moor Park East provided within the Colliers Employment Land Review, a key element of the Local Plan evidence base for employment options, should be relied upon when considering the merits of this site for employment. However, we agree with the conclusion of Colliers at Appendix 3 that West Moor Park East is well located and a potential extension to the established employment destination at West Moor Park. 7.3 In the light of the various concerns referred to above we consider that the Site Selection Methodology is not positively prepared, justified, effective or consistent with national policy. Considerable amendments are required to the Council’s approach in order to make it sound.

## Summary:

Note that there is an addendum to the Colliers Employment Land Review (February 2018) produced as a result of the 2018 Informal Consultation. It is only a selective update and does not update the assessment of West Moor Park East in the light of the response to the 2018 Informal Consultation. It is considered that the assessment of West Moor Park East in the Colliers Employment Land Review should not be relied upon. Do agree with Appendix 3 of the Colliers report that West Moor Park East is well located and is a potential extension to West Moor Park. Due to the concerns referred to above, it is considered that the Site Selection methodology is not positively prepared, justified, effective or consistent with national policy. Considerable amendments are required to make it sound.

## Response:

There is an addendum to the Colliers Employment Land Review to reflect inaccuracies in the description of Site 001 ? Thorne North. It is not the remit of the Employment Land Review to amend SA scores.
Comment Ref: C/Greenbelt/01394/1/002

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**Comment:**

We object in the strongest form to current proposals to release land from the greenbelt. Greenbelt by definition is designated to prevent the coalescence of conurbations through development within the areas between settlements. Any removal, or re-designation of this land is by definition an erosion of this national policy of protection. As the current proposal seeks to release areas (particularly west of Sprotbrough village and within the Barnburgh/Harlington area) from protection, and encourage development, it is by definition an attack on the current greenbelt. Ordinarily housing would not meet "very special circumstance," and would not be allowed in greenbelt. The Authority’s current policy to suggest "exceptional" circumstances mean it should be removed from the greenbelt is still development of this land in the long-run. The borough contains many other places development could easily be supported. It is our opinion the as such any "exceptional" argument, put forward by the Authority, and created to redefine land to support development is purity semantic and without merit. Development should only take place outside the current greenbelt limits. Removal of land through the current plan process will only make more land more easily re-defined in the future. It sets a dangerous precedent. Beyond the obvious policy change this represents, it has been obvious over recent years that the authority has already been systemically "lowering the bar" in relation to, "very special circumstances." By way of specific examples, the Moto motorway service station proposal, Hampole Quarry/Sterfibre storage facilities, and current proposal to build housing and (essentially) industrial units on the former High Melton College site all seem to easily pass through the hands of officers, who willingly endorse proposals with "recommendations to approve." The Authority's attacks on greenbelt within Sprotbrough Ward are sustained and consistent by developers. Officers are meant to prevent it. A plan written by officers who now propose re-designation of greenbelt land underlines the contempt with which the Authority views National Planning Policy relating to greenbelt. Thankfully two of the above proposals were turned down by the Authority's Planning Committee (against officer recommendation) BUT subsequently BOTH refusals were then upheld at appeal/public enquiry. It is worrying that the current local plan ignores the important lessons in these appeal results. Sadly, the third proposal continues to progress through the system with support solely based on assumptions provided by a developer. Poorer still is the Authority's continued policy to accept developer assumptions and business cases entirely unverified by any external/independent assessment. These are not the basis to meet "very special circumstance" or "the exceptional ones" used to re-designate land. Finally upon greenbelt, underlining the need to reinforce the authority's commitment to existing greenbelt, it is clearly a matter of urgency that many officers seem to need to re-learn the importance of its headline in being the most protected status of land within our borough, and treated it as such.

**Summary:**

Objection is made to the removal of land from the Green Belt and allocation for development, particularly west of Sprotbrough village and within the Barnburgh/Harlington area. Development should take place outside of the currently defined Green Belt - the Borough contains many other places where development could easily be supported. Any "exceptional" argument, put forward by the Authority, and created to re-define land to support development is purity semantic and without merit.

**Response:**

Local Plan's can amend Green Belt boundaries where they have demonstrated exceptional circumstances for doing so. Such matters have been set out through numerous supporting documents including the Green Belt Review, Topic Paper and site selection methodology. The local plan is not significantly altering the general extent of the Green Belt and the vast majority of the west of the borough is being retained as Green Belt where national planning policy will apply. Other points raised are specific to planning applications/very special circumstances and not the local plan.
Comment:

We object in the strongest form to current proposals to release land from the greenbelt. Greenbelt by definition is designated to prevent the coalescence of conurbations through development within the areas between settlements. Any removal, or re-designation of this land is by definition an erosion of this national policy of protection. As the current proposal seeks to release areas (particularly west of Sprotborough village and within the Barnburgh/Harlington area) from protection, and encourage development, it is by definition an attack on the current greenbelt. Ordinarily housing would not meet “very special circumstance,” and would not be allowed in greenbelt. The Authority’s current policy to suggest “exceptional” circumstances mean it should be removed from the greenbelt is still development of this land in the long-run. The borough contains many other places development could easily be supported. Development should take place outside the current greenbelt limits. Removal of land through the current plan process will only make more land more easily re-defined in the future. It sets a dangerous precedent. Beyond the obvious policy change this represents, it has been obvious over recent years that the authority has already been systemically “lowering the bar” in relation to, “very special circumstances.” By way of specific examples, the Moto motorway service station proposal, Hampole Quarry/Sterfibre storage facilities, and current proposal to build housing and (essentially) industrial units on the former High Melton College site all seem to easily pass through the hands of officers, who willingly endorse proposals with “recommendations to approve.” The Authority’s attacks on greenbelt within Sprotbrough Ward are sustained and consistent by developers. Officers are meant to prevent it. A plan written by officers who now propose re-designation of greenbelt land undermines the contempt with which the Authority views National Planning Policy relating to greenbelt. Thankfully two of the above proposals were turned down by the Authority’s Planning Committee (against officer recommendation) BUT subsequently BOTH refusals were then upheld at appeal/public enquiry. It is worrying that the current local plan ignores the important lessons in these appeal results. Sadly, the third proposal continues to progress through the system with support solely based on assumptions provided by a developer. Poorer still is the Authority’s continued policy to accept developer assumptions and business cases entirely unverified by any external/independent assessment. These are not the basis to meet “very special circumstance” or “the exceptional ones” used to re-designate land. Finally upon greenbelt, underlining the need to reinforce the authority’s commitment to existing greenbelt, it is clearly a matter of urgency that many officers seem to need to re-learn the importance of its headline in being the most protected status of land within our borough, and treated it as such.

Summary:

Objection is made to the removal of land from the Green Belt and allocation for development, particularly west of Sprotborough village and within the Barnburgh/Harlington area. Development should take place outside of the currently defined Green Belt - the Borough contains many other places where development could easily be supported. Any “exceptional” argument, put forward by the Authority, and created to re-define land to support development is purity semantic and without merit.

Response:

Local Plan's can amend Green Belt boundaries where they have demonstrated exceptional circumstances for doing so. Such matters have been set out through numerous supporting documents including the Green Belt Review, Topic Paper and site selection methodology. The local plan is not significantly altering the general extent of the Green Belt and the vast majority of the west of the borough is being retained as Green Belt where national planning policy will apply. Other points raised are specific to planning applications/very special circumstances and not the local plan.
We act for a number of major land owners in the Doncaster area, we have detailed knowledge of the sites and the planning history of the Borough. We have previously been involved with the Core Strategy Plan and with the Examination of the draft Sites and Policies DPD. Our knowledge of the various land parcels, ownerships, the strategic land position and site specific details, means that we have information to inform the debate regarding the overall housing requirement and the specific allocation of sites which will assist the examination.

The alteration to the Green Belt Boundary at Carcroft Skellow around sites 186 and 165 is supported. The proposed new boundary is a logical and defensible boundary for the Green Belt, the A1 and Green Lane form substantial and well defined boundaries to the settlement. It is noted that the Proposals Map that the boundary now includes the two properties to the north west of the site; however the Map in the Developer Requirements on pages 272 and 273 do not have the same boundary shown. This Plan needs to be amended to match the Proposals Map.

Supports alteration to Green Belt Boundary to remove site allocation Ref 165/186 at Carcroft-Skellow. The new boundary is logical and defensible with well-defined boundaries. The Policies Map boundary includes the 2 properties to the north-west of the site but the developer requirements plan does not and should be amended to match the Policies Map. The allocation should also be included in the development limits of the settlement.

Support noted. The developer requirements map does not denote Green Belt, rather it reflects the red line boundary for sites 165/186. As per the development limits methodology, the site will not be included in the development limits as it is a greenfield allocation, however it will be shown as an allocation and removed from the Green Belt.
Tests of Soundness:

Comment:
Green Belt (6) the meaning of Green Belt is explained. However, - The removal of land from Green Belt in both service villages of Barnburgh-Harlington and Sprotborough (Appendix 2, sites 777 & 929 respectively) requires further justification with regards to ‘special circumstances’ (NPPF). Otherwise, precedents will be set for reducing the amount of Green Belt land.

Summary:
Policy 2, Part 6 : Green Belt. The meaning of Green Belt is explained. However, the removal of land from Green Belt in both service villages of Barnburgh-Harlington and Sprotborough (Appendix 2, sites 777 & 929 respectively) requires further justification with regards to ‘special circumstances’ (NPPF). Otherwise, precedents will be set for reducing the amount of Green Belt land.

Response:
The exceptional circumstances argument is set out in the Green Belt Topic Paper.
3.1 Paragraph 139 of the National Planning Policy Framework states that when defining Green Belt boundaries councils should “where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period.” 3.2 Despite the council recognising the constraint that the borough’s Green Belt places on development, and the acceptance that some land should be released from the Green Belt to facilitate development, no land has been safeguarded for future development. The Local Plan is therefore contrary to national policy and is unsound. 3.3 To make the Local Plan sound some safeguarded sites should be identified.

Response:
As set out in the Green Belt Topic Paper, it is not considered "necessary" or appropriate to allocate safeguarded land at this time.
This representation applies to land off Charter Drive, Scawthorpe, Doncaster (Local Plan ref: 02992), which comprises a small plot of land of 0.079 hectares. Previous representations were prepared in relation to this plot of land and submitted during the Draft Policies and Proposed Sites consultation exercise in September/October 2018. The previous representations specifically requested that the Council revisit their Green Belt and settlement boundary Local Plan evidence base and to re-assess the site accordingly. It was considered that the site should be excluded from the Green Belt and that the Proposals Map should be clear in defining the extent of the Green Belt based on appropriate features on the ground. My client is pleased to see that their comments have been taken into account and that the Proposals Map clearly shows that the Green Belt boundary follows the line of an established hedgerow, which forms a clear and appropriate boundary that will endure the test of time. It is therefore considered that, without prejudice to the potential for the large adjacent sites to come forward for housing development, the proposed Green Belt boundary in the vicinity of the above site is appropriate and the Local Plan can therefore be considered to be legally compliant and sound to this effect.

Summary:
Land of Charter drive Scawthorpe. Support the proposed amendment to the Green Belt and considers the Local Plan to be legally compliant and sound.

Response:
Noted. Support welcomed.
Exceptional Circumstances for Green Belt Review

7.1 The Local Plan Evidence Base 'Green Belt Phase 3 Report Summary' identifies that there are known constraints on the supply of land at those settlements which form strategic settlements in the draft Local Plan Policy 2 - a Strategic Policy. In doing so, and in respect of NPPF paragraph 137, the Authority confirm that exceptional circumstances exist to justify changes to Green Belt boundaries in this Local Plan, and this approach is being taken at sustainable settlements within the Borough. 7.2 At this stage of the plan, only one small site at Bawtry is proposed to be removed from the Green Belt. Given the reasons set out above for additional growth to be provided for in the Borough more widely, and also at Bawtry; and the Flood Zone restrictions on the east side of the settlement, it is necessary and justified to provide further Green Belt releases for the settlement. Bawtry: Green Belt Review 7.3 The Local Plan Evidence Base 'Green Belt Phase 3 Report Summary' confirms the methodology for the assessments of Sites through the Green Belt Review. Each site has been assessed in two ways: for the strength of the boundary, and against the site's contribution to the five purposes of the Green Belt (NPPF, para 134). The site is then given an overall score through a 'Strength of Case' Matrix on the "strength of case for continuing in the site selection process". This could be strong, moderately strong, moderate, moderately weak or weak case. 7.4 The site promoted in this representation covers land previously considered as Site 873, as well as some additional land, as shown on the site location plan on page 3 of this representation. Site 873 Site A, Land at Martin Common Farm, was assessed as having a Weak Case for inclusion in further site selection work. We dispute this assessment and consider it unsound. 7.5 The Green Belt Review (Stage 3) for Site 873 states that "The proposed Green Belt boundary would be weakly defined by a field boundary supported by moderately dense field boundaries to the west, the A639 Great North Road in the east which represents a strongly defined Green Belt feature and a weakly defined boundary in the north which is based on no infrastructure or natural boundaries. Whilst release of the Proposed Green Belt site would result in a northern extension to Bawtry, the Proposed Green Belt boundary features, particularly to the north, are therefore considered to be weak." 7.6 To address these boundary issues the proposed residential development has been scaled back to the south west portion of the site. This area is bounded by Martin Lane to the south west, residential development to the east and a former airfield track to the north west. These boundaries can be further enhanced through appropriate landscaping. The development area as now proposed is, therefore, surrounded by clear defensible boundaries on all sides. In this respect the boundary feature should now be considered 'strong'. 7.7 In respect of the purposes of the Green Belt, The Green Belt Review (Stage 3), states that Site 873 strongly performs against local interpretation of the Green Belt purposes: it "performs weakly when assessed against the extent to which the Green Belt checks the unrestricted sprawl of a large-built up area, has a moderately weak role in preserving the setting and special character of Bawtry, and has a moderate role in preventing neighbouring towns from merging by resisting ribbon development. The Green Belt at this location is not considered to have a role in assisting urban regeneration by encouraging the recycling of derelict and other urban land, however the Site contains land which is considered to have a strong role in safeguarding the countryside from encroachment." 7.8 To minimise the impact of the proposals and minimise the effect of encroachment the development parcel has been scaled back to the area immediately abutting the residential development to the east. The existing residential development already forms a protrusion into the countryside particularly Ingham Road / Grange Avenue. The proposed residential development would simply 'round-off' the development limit at this point. 7.9 In landscape and visual terms, the site at Martin Lane provides the opportunity for a well-designed scheme to serve as an appropriate extension to the north-west of the village. 7.10 The landscape of the site was identified in the published Landscape Capacity Study (see appendix 2) to be of only 'moderate' quality and this is further influenced by the adjacent commercial premises. This would be generally well contained in views from the wider landscape, in part due to the screening brought about by dense largely coniferous Bawtry Forest to the north and west, and King's Wood to the east of the A638. This assessment was made on the previous submission which was larger in scale. The proposals as revised would further minimise the visual impacts. The Concept Masterplan (appendix 1) identifies that the build line will follow the existing built form in this area of Bawtry. Further, a green offset to Martin Lane is proposed. This will not only provide a visually attractive and interesting gateway to the site but will also minimise its visual impact. (SEE EMAIL FOR Appendices) 7.11 There is currently no formalised public access to the site and the development would therefore allow for new footpath links and connectivity which would be of benefit to existing residents in the north of the village. In addition, it would provide the opportunity for new areas of publicly accessible green space. 7.12 Overall, the scheme could be designed to serve as an appropriate rounding off of the village which would complement similar more recent residential development and its associated open space provision on the eastern side of the A683. With regard to the location of the site in the Green Belt, the development of this parcel of land would not result in any substantive or appreciable reduction in the separation between Bawtry and either Rosssington to the north, or Tickhill to the west. A well-designed scheme would allow for the creation of a new permanent and defensible Green Belt boundary formed by a clearly defined new vegetated buffer at the boundary of the site. The Concept Masterplan (appendix 1) that accompanies this representation provides a framework for development. 7.13 It is our position that this site should be allocated for residential development to meet the clear need for development within Bawtry and the wider borough.
Summary:
The authority confirm that exceptional circumstances exist to justify the amendment to Green Belt boundaries in the borough. Only one small Green Belt site is proposed in Bawtry to be removed from the Green Belt. Further release is needed. Dispute the outcome of the Green Belt review which assessed Site 873 as having a weak case for inclusion in further site selection work and consider this to be unsound. Flagged boundary issues have been noted and residential development scaled back to the SW portion of the site - bounded by Martin Lane, residential development and the former airfield track. Boundaries can be enhanced through appropriate landscaping. The development now proposed thus has clear defensible boundaries on all sides. It should now be considered strong. To address encroachment issues the development parcel has been scaled back to the area immediately abutting the residential development to the east. The existing residential development already protrudes into the countryside, particularly at Ingham Road / Grange Avenue. The residential development would round off the development limit. Martin Lane provides the opportunity for a well designed scheme to serve as an appropriate extension to the north west of the village. The Landscape Capacity Study identifies it as “moderate” quality. It would be generally contained in views from the wider landscape, in part due to screening from Bawtry Forest and Kings Wood. The assessment was made on the previous submission which is larger in scale. As revised, the visual impact would be minimised. The Concept Masterplan identifies that the build line will follow the existing built form. A green offset to Martin Lane is proposed. This will not only provide a visually attractive and interesting gateway to the site but will also minimise visual impact. There would be new footpaths / access and green space. Development would not reduce the separation between Bawtry and Rossington or Tickhill and a defensible boundary can be made. The site should be allocated for housing and meet the clear need for development in Bawtry and the borough.

Response:
The Green Belt review finds that this area of Green Belt has a weak case for continuation in the site selection process, based on an agreed and consistently applied methodology. As set out in the Green Belt Topic Paper, there are is no justification for releasing further land from the Green Belt in Bawtry to make up the shortfall of 20 units, given the lack of appropriately sized options and the harm to the Green Belt if releasing other land in this location (as established through the Green Belt Review). This is set out in the Green Belt Topic Paper.
4.1 The Doncaster Local Plan 2015-2035 - Policies Map and related Local Plan policies are, in part, unsound, this is primarily due to the inclusion of the iPort site within the Green Belt. 4.2 Policy 2, "settlements hierarchy" section 5 states: The openness and permanence of Doncaster’s Green Belt (as indicated on the key Diagram) and defined on the Proposals Map will be protected. The general extent of the Green Belt will be retained. Within the Green Belt, national planning policy will be applied including the presumption against inappropriate development except in very special circumstances. Safeguarded Land (shown on the Proposals Map) has been removed from the Green Belt but not allocated for development to meet longer development needs equivalent to 5 years beyond the Plan Period. The principles of protection given in national planning policy will apply to safeguarded land during the current Plan period. 4.3 RPS agree that the openness and permanence of Doncaster’s Green Belt should be protected, however the existing Policies Map fails to do this. DMBC state that the iPort development continues to be washed over by Green Belt because this reflects the very special circumstances that supported its development, as well as the site still being a long way from completion given its sheer size. (Para 16.123). 4.4 The continued retention of the iPort employment site in the Green Belt is not consistent with the character of the site; it has already been developed and built form is present. The continuation of its status as Green Belt land undermines the overall legitimacy of Green Belt policy. Paragraph 139 of the NPPF 2019 states that when defining Green Belt boundaries, local plans should: e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period. 4.5 DMBC have stated the following in their rebuttal of RPS’s previous representation: It is considered that amending the Green Belt will make no difference to the permitted scheme or its delivery in any eventuality, which can be developed as per the permission regardless of the site being Green Belt. 4.6 This approach is not in line with the National Planning Policy Framework, specifically Para 139 e) featured above. Regardless of how the Green Belt designation effects deliverability of the site, the land is, by virtue of its development, no longer permanently open. Para 134 sets out the five purposes of the Green Belt. The land at iPort cannot and does not contribute to the five purposes. It cannot assist in safeguarding the countryside from encroachment, as it has already been encroached by the granting of multiple planning permissions and subsequent developments on the site. 4.7 The iPort site abuts the settlement at Rossington, and there are several isolated parcels of land that serve little to no purpose trapped between the major transport links and developed land. In order for iPort to continue and expand its services into the future the developers of the site should be able to utilize the immediately adjacent land for ancillary development. The land around Bankwood roundabout north-east of iPort makes no contribution to the openness and purposes of the Green Belt. and therefore, should be removed in order for it to be developed in support of iPort and Rossington. 4.8 It is essential that there is some flexibility in the planning framework for the site, so that the iPort scheme can be updated to respond to changing economic circumstances. Retention of the site in the Green Belt limits the ability to respond promptly to changes, as even quite small changes to the scheme may have to be referred to the Secretary of State under the Green Belt consultation procedure. The introduction of a site-specific policy in the plan in parallel with the suggested Green Belt boundary change, could be used to ensure that the development of the site was consistent with the principles that underpinned the granting of the iPort permission. (SEE EMAIL FOR Photograph taken from Google Maps, looking west towards iPort from iPort Avenue. This site is included within the Green Belt, multiple applications have been approved by DMBC on site and much of the site has already been built out.) 4.9 RPS recommend that the Green Belt boundary is re-drawn and DMBC consider the following changes: - Exclusion of the entire iPort site from the Green Belt. - Exclusion of the land between the "Great Yorkshire Way (A6182)" and the north-east of iPort from the green belt boundary. (SEE EMAIL FOR Indicative drawing of the iPort area that should be released from the Green Belt. Existing Green Belt boundary is shown in Green and the area that should be released is outlined by a red)
Response:

iPort has an extant planning permission which allows the development to proceed even if it is still included within the Green Belt. A Green Belt Review has already been undertaken for this Local Plan and further information on the Green Belt can be found in the Green Belt Topic Paper. The Topic Paper also acknowledges that Green Belt boundaries are likely to be reviewed at the end of the plan period.
Response:

The Green Belt Review shows that this site has a moderately strong continuation in the site selection process, which makes it the joint best option in Green Belt terms along with site 826. 040 scores better in the SA, however, and can deliver approx. 200 homes, and therefore is the preferred option. The Green Belt Topic Paper sets out the exceptional circumstances for removing this site from the Green Belt, and also considers the options in Conisbrough Denaby fully in its assessment.
Comment:

5.33 Part of the site is currently allocated as open space and included in the Green Belt. The northern boundary of the site if formed by the existing employment allocation to the south of Broomhouse Lane, to the west are residential area and Edlington woods form the eastern and southern boundary. 5.34 The removal of the site from the green belt would provide the potential for an extension to the existing Broomhouse Lane industrial estate to provide additional land for the expansion of the existing Polypipe business which is in situ on the estate. 5.35 The proposed site boundary would bring the settlement boundary in line with the southern extent of the boundary to the west. Strong defensible boundaries would be formed by the existing Edlington woodland to the south and east. 5.36 The amendment to the Green Belt would enable a further employment allocation in the west of the borough to support and meet the needs of existing employers in this area providing choice and flexibility and ensuring that the existing business is able to expand and operate efficiently in the area to support the housing growth strategy. 5.37 A stable economy will ensure the inclusive and sustainable communities in the west of borough are maintained.

Summary:

Green Belt matters Part of the site is currently allocated as open space and included in the Green Belt removal of the site from the green belt would provide the potential for an extension to the existing Broomhouse Lane industrial estate proposed site boundary would bring the settlement boundary in line with the southern extent of the boundary to the west amending the Green Belt would enable a further employment allocation in the west of the borough to support and meet the needs of existing employers

Response:

There are no exceptional circumstances which justify the release of any sites from the Green Belt or amend the for employment use, as there is land available for employment development across the borough in non - Green Belt locations, and the settlement strategy for employment is not locationally specific (as it is with housing).
5.33 Part of the site is currently allocated as open space and included in the Green Belt. The northern boundary of the site if formed by the existing employment allocation to the south of Broomhouse Lane, to the west are residential area and Edlington woods form the eastern and southern boundary.  5.34 The removal of the site from the green belt would provide the potential for an extension to the existing Broomhouse Lane industrial estate to provide additional land for the expansion of the existing Polypipe business which is in situ on the estate.  5.35 The proposed site boundary would bring the settlement boundary in line with the southern extent of the boundary to the west. Strong defensible boundaries would be formed by the existing Edlington woodland to the south and east.  5.36 The amendment to the Green Belt would enable a further employment allocation in the west of the borough to support and meet the needs of existing employers in this area providing choice and flexibility and ensuring that the existing business is able to expand and operate efficiently in the area to support the housing growth strategy.  5.37 A stable economy will ensure the inclusive and sustainable communities in the west of borough are maintained.

Summary:
Part of the site is currently allocated as open space and included in the Green Belt removal of the site from the green belt would provide the potential for an employment extension proposed site boundary would bring the settlement boundary in line with the southern extent of the boundary to the west amendment to the Green Belt would enable a further employment allocation in the west of the borough to support and meet the needs of existing employers

Response:
The Green Belt Topic Paper sets out that there are no exceptional circumstances for amending the Green Belt for employment allocations, as there are development opportunities outside of the Green Belt in the borough, and the settlement strategy for employment does not stipulate allocations necessarily need to be made next to centres of population. In accordance with consultation on the strategy, employment can instead be in other locations and easily accessible.
Marr Parish Meeting note the overwhelming and very strong response to previous consultations where over 75% of the responses supported "The Borough's overall housing and employment needs should be met outside the Green Belt as far as possible so as to help protect the Green Belt". Marr Parish Meeting unanimously support this view and would like to see this strong opinion reflected in the Full Local Plan Draft. We further support previous Consultation Feedback: there were a significant number of responders who supported the use of Brown Field sites in preference to Green Belt for employment and development. This mirrors our very strong opinion, that it is crucial that the Green Belt bands between Doncaster, Wakefield, Barnsley and Rotherham are not eroded. It is our very strong opinion that Brownfield and existing redundant sites are prioritised over Greenbelt for development. Based on the Greenbelt reviews, Marr Parish are still unclear which sites /if any are to be proposed for development for new homes or job creation, or which sites are being considered, with a view to be taken out of Greenbelt. Interactive Maps have been provided, however they are unwieldy and not easily negotiated, feedback which we have already fed back to DMBC representatives. We believe more clarity is needed on these site locations. We maintain that affordable housing is not only needed and must be delivered within the Local Plan, however we do not believe that the Rural Communities can deliver the supporting services that will be needed e.g. public transport, health and Employment support etc. Even if development of this nature could be considered 'very special circumstances' under Greenbelt policies, we do not believe affordable housing in these locations could ever be sustainable. Affordable housing needs can only be realistically met within urban locations. We would again reiterate that our rural community maintains its view - that development in the small villages and hamlets must be proportionate, sympathetic and in keeping with their character to maintain our rural identities. Marr Parish strongly supports and would welcome the new proposed planning policies, where growth is directed to larger and more sustainable settlements and also those policies which seek to continually protect our rural communities and identities. Marr Parish fully supported being designated as a 'Smaller Greenbelt Village' with 'no Identified Development Limits' in the last 2018 consultation for the Local Plan. However, having consulted with communities to change their designation, which gained overwhelming support, DMBC have now withdrawn their intention and it will now no longer apply. Marr Parish maintains, that having completed a full review of the Greenbelt, with the sole purpose for this to act as a catalyst for changes to the Greenbelt for Doncaster, DMBC then proposed a change to designate of some of the villages to 'Smaller Greenbel Village'. However, although several other changes to the Greenbelt are now to be adopted within the Local Plan, the designation to 'Smaller Greenbelt Villages' has now been abandoned. With overwhelming support in favour of these new designations, Marr Parish advocate for this to be reinstated in the final version of the Local Plan. We maintain, Greenbelt and Agricultural land are a very precious resource which must be protected. Marr Parish continues to object to proposals for additional Greenbelt land to be 'safeguarded'. We do not believe that development necessitates the use of Greenbelt land but no more land should be taken out of Greenbelt than is vital. Land that will not be used for development 'over the life of the plan', does not in our opinion mean that Safeguard land can be considered vital and as such, it cannot be considered 'very special circumstances'. We strongly object to Greenbelt land being safeguarded and insist that it should remain Green Belt Land within the Local Plan.

Summary:
Support given to previous consultation feedback that overall housing and employment needs should be met outside the Green Belt as far as possible and that brownfield sites should be used in preference to Green Belt sites. Concern raised that it is unclear which of the proposed site allocations for new development are brownfield and which are proposed to be taken out of current Green Belt. Although it is considered Affordable Housing is not only needed, but should be delivered within the Local Plan, realistically it can only be provided in urban locations and could never be sustainable in Green Belt locations as rural communities cannot deliver the supporting services that will be needed such as public transport, health and employment support. Marr should be identified as a "Smaller Green Belt Village" with no identified 'Development Limits" as was proposed in the 2018 Consultation. Would not support identification of Green Belt Safeguarded Land because if such land is to remain undeveloped over the life of the plan then 'very special circumstances' cannot be demonstrated.

Response:
The Green Belt allocations have been clearly set out and justified in the Green Belt Topic Paper and Site Selection Methodology. Not all Green Belt proposals are in rural communities, and all sites proposed are part of settlements deemed sustainable. We would therefore expect affordable housing to come forward on these, and in some cases for this to be 23%, which is higher than many urban areas might be expected to deliver due to viability - as set out in the Viability report. The Green Belt Topic Paper explains why the Council reverted to the approach of defining Marr as a village inset in the Green Belt instead of covered by it. It is not considered that this approach was justifiable in Green Belt policy terms. The Council are not seeking to allocate safeguarded land for reasons set out in the Green Belt Topic Paper.
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**Comment:**

Going forward, as per previous advice, the IDP represents an essential document to identify and guide the delivery of new and improved infrastructure, including transport infrastructure, to support the Plan's development aspirations and is an important consideration to Highways England when we come to consider whether a Plan is sound and based on a robust and credible evidence base. Highways England will continue to work with Doncaster Council to assess the cumulative impact of the Local Plan on the SRN. Once completed, should any infrastructure improvements be necessary to deliver the Local Plan it is expected that these will be included within the IDP along with information on how they will be funded and timescales for delivery.

**Summary:**

The Infrastructure Delivery Plan is an essential document for identifying and guiding the delivery of new and improved infrastructure, including transport infrastructure, to support the plans development aspirations and will be important for Highways England in considering whether the plan is sound and based on a robust evidence base. Highways England will continue to work with DMBC to assess the cumulative impact on the SRN. Once complete, should improvements be necessary to deliver the Local Plan, these should be in the IDP with information on how they will be funded and delivery timescales.

**Response:**

Noted - the IDP has been updated for Submission to include the mitigation schemes identified through the ongoing technical assessment.
One of the challenges described in the Local Plan, Chapter 2 (2.18) is to increase the proportion of highly-skilled workers, because Doncaster has a higher than average number in low-skilled employment. Clearly higher and further education will be a key driver, with Doncaster College as a prime mover. The JRP supports Doncaster’s ambitions to improve educational opportunities and higher skilled employment. To that end, it would support objectives to enhance the digital/media economy. However, in the Doncaster Infrastructure Strategy Annex, Education and Learning: Chapter 2, p15, 2.22 on Education, reads as though the High Melton site of Doncaster College is still operational, though it has not been used for any educational purposes over 2 years and as such, buildings are becoming derelict. Ch 8 6.14, gives details of a #4.1 million development grant for film and TV studios and other facilities including an hotel. Clearly, it is misleading to give the impression that this has been approved by DMBC, when the site is not yet sold, and any planning permission would need to take into account whether the planned buildings would be greater than the original footprint, which could therefore, encroach on Green Belt. This #4.1m development is nowhere near or close to being confirmed.

Response:
The evidence base makes reference to this project, but any planning application in the future would need to accord with both national policy and the relevant policies in the local plan, including in respect to Green Belt.
For your information we have set out some general guidelines that may be useful to you. Position Statement As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills. Sewage Strategy Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works. Surface Water and Sewer Flooding We expect surface water to be managed in line with the Government’s Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewers. We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers. To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-andguidance/infrastructure-charges/ Water Quality Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency’s Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency. Water Supply When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts. We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands. Water Efficiency Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations. We recommend that in all cases you consider: - Single flush siphon toilet cistern and those with a flush volume of 4 litres. - Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute. - Hand wash basin taps with low flow rates of 4 litres or less. - Water butts for external use in properties with gardens. To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-andguidance/infrastructure-charges/ We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.

General guidelines are provided on: Position Statement As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills. Sewage Strategy Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of...
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Response:

Comments are noted. In respect to the optional requirement for Building Regulations of 110 litres of water per person per day, no substantive evidence has been found, or provided to the Council, demonstrating a need for the optional water standards in the Severn Trent Water area or within the wider Borough. Clean water is provided by Yorkshire Water who have not raised water availability as an issue and therefore this optional requirement has not been viability tested. The government commissioned Water stressed areas ? final Classification, July 2013, developed by the Environment Agency and Natural Resources Wales highlights utility suppliers in the vast majority of the Doncaster area as having moderate stress which is categorised as not serious.
Tests of Soundness: 

Comment: Please also find attached a copy of our high level assessment of the sites, the additional sites that we have assessed through this consultation as highlighted in Yellow or Red, the site at the Airport highlighted in Red is believed to be located within the Anglian water inset, therefore consultation with Anglian water will be needed or that site. (SEE EMAIL FOR HIGH LEVEL ASSESSMENT)

Summary: A copy of Severn Trent Water's high level assessment of site allocations is supplied (by attached email): the additional sites that have been assessed through this consultation are highlighted in Yellow or Red. The site at the Airport highlighted in Red is believed to be located within the Anglian water inset, therefore consultation with Anglian water will be needed or that site.

Response: The Council notes the assessment carried out by Severn Trent for sites within their catchment.
Soundness 3.1 Paragraph 35 of the National Planning Policy Framework ("NPPF") deals with examining Local Plans and states: "Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are: a) Positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; b) Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; c) Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and d) Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in this Framework." 3.2 In addition, we note guidance published by the Planning Advisory Service entitled 'Soundness Self-Assessment Checklist (March 2014)' which is used by local authorities in the preparation of local plans. This guidance, although advisory, enables the preparation of a robust local plan which is positively prepared, justified, effective and consistent with national policy. 3.3 The Soundness Checklist advises that in terms of being "justified" the plan should be based on a robust and credible evidence base involving: - Research/fact finding: the choices made in the plan are backed up by facts. - Evidence of participation of the local community and others having a stake in the area. 3.4 In terms of the plan being the most appropriate strategy when considered against reasonable alternatives, the Soundness Checklist advises that these alternatives should be realistic and subject to sustainability appraisal. The plan should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved. 3.5 With regard to the test of "effective" the Soundness Checklists advises that this means that the plan should be deliverable, requiring evidence of: - Sound infrastructure delivery planning; - Having no regulatory or national planning barriers to delivery; - Delivery partners who are signed up to it; and - Coherence with the strategies of the neighbouring authorities, including neighbouring marine planning authorities. - The Plan should be flexible and able to be monitored. 3.6 The Soundness Checklist advises that the plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. General Policies 3.7 The NPPF contains a presumption in favour of sustainable development. Paragraph 11 provides: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole." 3.8 With regard to plan making, paragraph 16 of the NPPF states that plans should: a) be prepared with the objective of contributing to the achievement of sustainable development; b) be prepared positively, in a way that is aspirational but deliverable; c) be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees; d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals; e) be accessible through the use of digital tools to assist public involvement and policy presentation; and f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)." 3.9 Having regard to the above policies and statutory context we do not consider that the Publication Draft Local Plan is sound for the reasons set out below.

Summary:
Soundness Paragraph 35 of the NPPF deals with examining Local Plans as does the Planning Advisory Service guidance note entitled 'Soundness Self-Assessment Checklist (March 2014). The plan should be based on a robust and credible evidence base and the strategy should consider realistic alternatives which have been subjected to sustainability appraisal. The plan should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved. The plan should be deliverable and flexible to deal with changing circumstances. General Policies Paragraph 11 of the NPPF contains a presumption in favour of sustainable development. It is considered that the Publication Draft Local Plan is not sound.

Response:
Noted
2.1. The Government’s core objectives as established through the 2018 National Planning Policy Framework (the 2018 Framework) are sustainable development and growth. Paragraph 11 of the Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The 2018 Framework sets out to boost significantly the supply of homes and that a sufficient amount and variety of land can come forward where it is needed. In terms of building a strong and competitive economy the 2018 Framework states that planning should help create the conditions in which businesses can invest, expand and adapt. The key focus throughout the 2018 Framework is to create the conditions for sustainable economic growth and deliver a wide choice of high quality homes. The sites identified to meet the housing target must be deliverable and developable.  

2.2. In relation to Local Plan formulation, paragraphs 15 to 37 of the Framework states that Local Plans are the key to delivering sustainable development which reflects the vision and aspirations of the local community. The Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where.  

2.3. In relation to the examination of Local Plans, paragraph 35 of the Framework sets out the tests of soundness and establishes that:  

2.4. The Local Plan and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sounds. Plans are ‘sound’ if they are: Positively prepared - providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development  

Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate; Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in this.  

2.5. This document therefore considers the content of the Draft Local Plan consultation document on behalf of H. Burtwistle & Son in light of this planning policy context.
Comment:

2.1. The Government's core objectives as established through the 2018 National Planning Policy Framework (the 2018 Framework) are sustainable development and growth. Paragraph 11 of the Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The 2018 Framework sets out to boost significantly the supply of homes and that a sufficient amount and variety of land can come forward where it is needed. In terms of building a strong and competitive economy the 2018 Framework states that planning should help create the conditions in which businesses can invest, expand and adapt. The key focus throughout the 2018 Framework is to create the conditions for sustainable economic growth and deliver a wide choice of high quality homes. The sites identified to meet the housing target must be deliverable and developable. 2.2. In relation to Local Plan formulation, paragraphs 15 to 37 of the Framework states that Local Plans are the key to delivering sustainable development which reflects the vision and aspirations of the local community. The Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where. 2.3. In relation to the examination of Local Plans, paragraph 35 of the Framework sets out the tests of soundness and establishes that: 2.4. The Local Plan and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sounds. Plans are 'sound' if they are: Positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate; Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in this. 2.5. This document therefore considers the content of the Draft Local Plan consultation document on behalf of H. Burtwistle & Son in light of this planning policy context.

Summary:
Sets out a summary of NPPF and relevant paras in relation to local plans, including the tests of soundness.

Response:
The NPPF seeks to support a pro-growth economy and significantly boost the supply of housing, however it is greatly frustrating that the Local Plan does not reflect this nor is it considered to be consistent with national policy in this respect. We would therefore strongly encourage the Council to plan ambitiously in order to facilitate sustainable economic growth. The NPPF is very clear in promoting and boosting the supply of new housing and employment land. Paragraph 59 of the NPPF is clear that: 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, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. With respect to economic development, paragraph 80 states: Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential. It is considered that the emerging Local Plan does not comply with the NPPF in this regard and therefore it cannot be found to be 'sound' in this respect. The Site at Nutwell South (149) is capable of delivering much needed employment and housing provision in addition to an access road which has the potential to serve the aforementioned uses in addition to the potential to provide a much bypass for Armthorpe. Such a bypass would benefit both the local and the wider communities, helping to deliver the required levels of identified growth within the Local Plan. There is a recognised national awareness of the importance of the deliverability of sites which is evidenced by the relatively recent introduction of the Deliverability Test in November 2019. We would therefore strongly encourage the Council to allocate additional sites for growth with a focus on those which are likely to come forward for development within the next five years, particularly those sites which are not reliant on infrastructure and other opening-up matters to come forward for development. Land at Nutwell Lane (149) is a site which is immediately deliverable, significantly supported by the construction of the adjacent road to the north. The allocation of Site 149 would therefore be consistent with the NPPF in this regard, given it advocates and supports any form of sustainable development. Recommendation 3: DMBC should revisit the evidence base and sustainability appraisal for discounting alternative sites to ensure that equal weighting is being applied to potential development sites. DMBC must be consistent in the site selection methodology and approach to allocating sites across the Borough. Recommendation 4: Include Site 149 along with site 818 for allocation, given that they both partially sit within flood zone 2/3 and both deliver essential infrastructure needed for the growth of the borough. Technical constraints can be overcome in this respect.

Summary:
The NPPF seeks to support a pro-growth economy and significantly boost the supply of housing. It is frustrating that the Local Plan does not reflect this and it is therefore not consistent with national policy. We would strongly encourage the Council to plan ambitiously to support sustainable economic growth. The NPPF is very clear in promoting and boosting the supply of new housing (para 59) and employment land (para 80) and it is considered that the emerging Local Plan does not comply with the NPPF in this regard and it cannot be found to be 'sound'. Site 149 is capable of delivering employment and housing provision together with an access road and an Armthorpe bypass. Such a bypass would benefit both the local and the wider communities, and help to deliver the required levels of growth within the Local Plan. We strongly encourage the Council to allocate additional sites for growth with a focus on those which are likely to come forward for development within the next five years, particularly those sites which are not reliant on infrastructure to come forward for development. Site 149 is immediately deliverable and supported by the construction of the adjacent road to the north. The allocation of Site 149 would therefore be consistent with the NPPF, given it advocates and supports any form of sustainable development. The Council should revisit the evidence base and sustainability appraisal for discounting alternative sites to ensure that equal weighting is being applied to potential development sites. The Council must be consistent in the site selection methodology and approach to allocating sites across the Borough. Site 149 should be allocated along with site 818, given that they both partially sit within flood zone 2/3 and both deliver essential infrastructure needed for the growth of the borough. Technical constraints can be overcome.
2.1. The Government’s core objectives as established through the 2018 National Planning Policy Framework (the 2019 Framework) are sustainable development and growth. Paragraph 11 of the Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The 2019 Framework sets out to boost significantly the supply of homes and that a sufficient amount and variety of land can come forward where it is needed. In terms of building a strong and competitive economy the 2019 Framework states that planning should help create the conditions in which businesses can invest, expand and adapt. The key focus throughout the 2019 Framework is to create the conditions for sustainable economic growth and deliver a wide choice of high quality homes.  

2.2. In relation to Local Plan formulation, paragraphs 15 to 37 of the Framework states that Local Plans are the key to delivering sustainable development which reflects the vision and aspirations of the local community. The Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where.  

2.3. In relation to the examination of Local Plans, paragraph 35 of the Framework sets out the tests of soundness and establishes that:  

2.4. The Local Plan and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are: Positively prepared - providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; Effective - deliverable over the plan period, and based on effective joint working on crossboundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Framework.  

2.5. This document therefore considers the content of the Doncaster Local Plan 2015-2035 on behalf of EON in light of this planning policy context.
Comment:

2.1. The Government’s core objectives as established through the 2018 National Planning Policy Framework (the 2019 Framework) are sustainable development and growth. Paragraph 11 of the Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The 2019 Framework sets out to boost significantly the supply of homes and that a sufficient amount and variety of land can come forward where it is needed. In terms of building a strong and competitive economy the 2019 Framework states that planning should help create the conditions in which businesses can invest, expand and adapt. The key focus throughout the 2019 Framework is to create the conditions for sustainable economic growth and deliver a wide choice of high quality homes. 2.2. In relation to Local Plan formulation, paragraphs 15 to 37 of the Framework states that Local Plans are the key to delivering sustainable development which reflects the vision and aspirations of the local community. The Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where. 2.3. In relation to the examination of Local Plans, paragraph 35 of the Framework sets out the tests of soundness and establishes that: 2.4. The Local Plan and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sounds. Plans are ‘sound’ if they are: Positively prepared - providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development. Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Framework. 2.5. This document therefore considers the content of the Doncaster Local Plan - Publication Version (2015-2035) on behalf of Framecourt Homes in light of this planning policy context.

Summary:

This representation considers whether the Local Plan is sound as per para. 35 of the framework.

Response:
Tests of Soundness:

Comment:

2.1. The Government’s core objectives as established through the 2018 National Planning Policy Framework (the 2019 Framework) are sustainable development and growth. Paragraph 11 of the Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The 2019 Framework sets out to boost significantly the supply of homes and that a sufficient amount and variety of land can come forward where it is needed. In terms of building a strong and competitive economy the 2019 Framework states that planning should help create the conditions in which businesses can invest, expand and adapt. The key focus throughout the 2019 Framework is to create the conditions for sustainable economic growth and deliver a wide choice of high quality homes. 2.2. In relation to Local Plan formulation, paragraphs 15 to 37 of the Framework states that Local Plans are the key to delivering sustainable development which reflects the vision and aspirations of the local community. The Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where. 2.3. In relation to the examination of Local Plans, paragraph 35 of the Framework sets out the tests of soundness and establishes that: 2.4. The Local Plan and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sounds. Plans are ‘sound’ if they are: Positively prepared - providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development  Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;  Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and  Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Framework. 2.5. This document therefore considers the content of the Doncaster Local Plan - Publication Version (2015-2035) on behalf of Avant Homes in light of this planning policy context.

Summary:

This representation considers the content of the Doncaster Local Plan in the light of the requirement that plans are: Positively prepared - providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Framework.

Response:
2.1. The Government’s core objectives as established through the 2018 National Planning Policy Framework (the 2019 Framework) are sustainable development and growth. Paragraph 11 of the Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The 2019 Framework sets out to boost significantly the supply of homes and that a sufficient amount and variety of land can come forward where it is needed. In terms of building a strong and competitive economy the 2019 Framework states that planning should help create the conditions in which businesses can invest, expand and adapt. The key focus throughout the 2019 Framework is to create the conditions for sustainable economic growth and deliver a wide choice of high quality homes.  

2.2. In relation to Local Plan formulation, paragraphs 15 to 37 of the Framework states that Local Plans are the key to delivering sustainable development which reflects the vision and aspirations of the local community. The Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where.  

2.3. In relation to the examination of Local Plans, paragraph 35 of the Framework sets out the tests of soundness and establishes that:  

2.4. The Local Plan and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sounds. Plans are ‘sound’ if they are: Positively prepared - providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development  Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;  Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and  Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Framework.  

2.5. This document therefore considers the content of the Doncaster Local Plan - Publication Version (2015-2035) on behalf of Avant Homes in light of this planning policy context.
2.1. The Government’s core objectives as established through the 2018 National Planning Policy Framework (the 2019 Framework) are sustainable development and growth. Paragraph 11 of the Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The 2019 Framework sets out to boost significantly the supply of homes and that a sufficient amount and variety of land can come forward where it is needed. In terms of building a strong and competitive economy the 2019 Framework states that planning should help create the conditions in which businesses can invest, expand and adapt. The key focus throughout the 2019 Framework is to create the conditions for sustainable economic growth and deliver a wide choice of high quality homes. 2.2. In relation to Local Plan formulation, paragraphs 15 to 37 of the Framework states that Local Plans are the key to delivering sustainable development which reflects the vision and aspirations of the local community. The Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where. 2.3. In relation to the examination of Local Plans, paragraph 35 of the Framework sets out the tests of soundness and establishes that: 2.4. The Local Plan and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sounds. Plans are ‘sound’ if they are: Positively prepared - providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Framework. 2.5. This document therefore considers the content of the Doncaster Local Plan - Publication Version (2015-2035) on behalf of Avant Homes in light of this planning policy context.
2.1. The Government’s core objectives as established through the 2018 National Planning Policy Framework (the 2019 Framework) are sustainable development and growth. Paragraph 11 of the Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The 2019 Framework sets out to boost significantly the supply of homes and that a sufficient amount and variety of land can come forward where it is needed. In terms of building a strong and competitive economy the 2019 Framework states that planning should help create the conditions in which businesses can invest, expand and adapt. The key focus throughout the 2019 Framework is to create the conditions for sustainable economic growth and deliver a wide choice of high quality homes.  

2.2. In relation to Local Plan formulation, paragraphs 15 to 37 of the Framework states that Local Plans are the key to delivering sustainable development which reflects the vision and aspirations of the local community. The Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where.  

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2.5. This document therefore considers the content of the Doncaster Local Plan - Publication Version (2015-2035) on behalf of Avant Homes in light of this planning policy context.
2.1. The Government’s core objectives as established through the 2018 National Planning Policy Framework (the 2019 Framework) are sustainable development and growth. Paragraph 11 of the Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The 2019 Framework sets out to boost significantly the supply of homes and that a sufficient amount and variety of land can come forward where it is needed. In terms of building a strong and competitive economy the 2019 Framework states that planning should help create the conditions in which businesses can invest, expand and adapt. The key focus throughout the 2019 Framework is to create the conditions for sustainable economic growth and deliver a wide choice of high quality homes.  

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2.5. This document therefore considers the content of the Doncaster Local Plan - Publication Version (2015-2035) on behalf of Priority Space in light of this planning policy context.

Summary:  
Comments noted.

Response:
2.1. The Government’s core objectives as established through the 2018 National Planning Policy Framework (the 2019 Framework) are sustainable development and growth. Paragraph 11 of the Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The 2019 Framework sets out to boost significantly the supply of homes and that a sufficient amount and variety of land can come forward where it is needed. In terms of building a strong and competitive economy the 2019 Framework states that planning should help create the conditions in which businesses can invest, expand and adapt. The key focus throughout the 2019 Framework is to create the conditions for sustainable economic growth and deliver a wide choice of high quality homes.  

2.2. In relation to Local Plan formulation, paragraphs 15 to 37 of the Framework states that Local Plans are the key to delivering sustainable development which reflects the vision and aspirations of the local community. The Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where.  

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2.5. This document therefore considers the content of the Doncaster Local Plan - Publication Version (2015-2035) on behalf of Firsure in light of this planning policy context.

Summary:
Summary is given of parts of NPPF as its relates to plan making including the tests of soundness.
2.1. The Government’s core objectives as established through the 2018 National Planning Policy Framework (the 2019 Framework) are sustainable development and growth. Paragraph 11 of the Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The 2019 Framework sets out to boost significantly the supply of homes and that a sufficient amount and variety of land can come forward where it is needed. In terms of building a strong and competitive economy the 2019 Framework states that planning should help create the conditions in which businesses can invest, expand and adapt. The key focus throughout the 2019 Framework is to create the conditions for sustainable economic growth and deliver a wide choice of high quality homes. 2.2. In relation to Local Plan formulation, paragraphs 15 to 37 of the Framework states that Local Plans are the key to delivering sustainable development which reflects the vision and aspirations of the local community. The Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where. 2.3. In relation to the examination of Local Plans, paragraph 35 of the Framework sets out the tests of soundness and establishes that: 2.4. The Local Plan and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sounds. Plans are ‘sound’ if they are: Positively prepared - providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development. Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Framework. 2.5. This document therefore considers the content of the Doncaster Local Plan - Publication Version (2015-2035) on behalf of Metroland in light of this planning policy context.

Summary:
Comments noted.

Response:
3.1 These representations have been prepared in relation to the Doncaster Regulation 19 Publication Local Plan Consultation, August 2019. They address the following matters: - Local Plan vision - Strategic Approach - Employment Policy Areas and Allocations - Residential Policy Areas - Transport Access and Infrastructure - Green infrastructure - Spatial Proposals The National Planning Policy Framework (NPPF) 3.2 The National Planning Policy Framework (NPPF) was published in February 2019. As the Publication Plan was issued in August 2019, the document should wholly reflect the National Planning Policy Guidance set out in the NPPF. 3.3 Paragraphs 15-37 of the NPPF refer to plan making. Paragraph 16 advises that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development which is a legal requirement. Therefore, they should be consistent with the principles and policies set out in the framework, including the presumption in favour of sustainable development. Paragraph 16 requires plans to be aspirational but deliverable. NPPF Tests of Soundness/European SEA Directive and Environmental Assessment of Plans and Programmes Regulations 2004 3.4 As the publication draft will subsequently be examined by an independent inspector, the document will be assessed on the basis of whether the plan has been prepared in accordance with the duty to cooperate, legal and procedural requirements and whether it is sound. Paragraph 35 of the NPPF advises: - "Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they area sound. Plans are 'sound' if they are; - Positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; - Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; - Effective - deliverable over its period and based on effective joint working on cross boundary strategic priorities matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and - Consistent with National Policy - enabling the delivery of sustainable development in accordance with the policies in this framework.

Summary:
3.1 These representations have been prepared in relation to the Doncaster Regulation 19 Publication Local Plan Consultation, August 2019. They address the following matters: - Local Plan vision - Strategic Approach - Employment Policy Areas and Allocations - Residential Policy Areas - Transport Access and Infrastructure - Green infrastructure - Spatial Proposals The National Planning Policy Framework (NPPF) 3.2 The National Planning Policy Framework (NPPF) was published in February 2019. As the Publication Plan was issued in August 2019, the document should wholly reflect the National Planning Policy Guidance set out in the NPPF. 3.3 Paragraphs 15-37 of the NPPF refer to plan making. Paragraph 16 advises that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development which is a legal requirement. Therefore, they should be consistent with the principles and policies set out in the framework, including the presumption in favour of sustainable development. Paragraph 16 requires plans to be aspirational but deliverable. NPPF Tests of Soundness/European SEA Directive and Environmental Assessment of Plans and Programmes Regulations 2004 3.4 As the publication draft will subsequently be examined by an independent inspector, the document will be assessed on the basis of whether the plan has been prepared in accordance with the duty to cooperate, legal and procedural requirements and whether it is sound. 3.5 Paragraph 35 of the NPPF advises: "Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are; - Positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; - Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; - Effective -deliverable over its period and based on effective joint working on cross boundary strategic priorities matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and - Consistent with National Policy - enabling the delivery of sustainable development in accordance with the policies in this framework.

Summary:

Response:
8. The Council is particularly concerned that the Thorne and Moorends Neighbourhood Plan was not actioned by DMBC when it was submitted for examination and referendum. The Neighbourhood Plan should have been adopted long before now and the Local Plan drafted with regard to it. Unfortunately long delays and omissions on the part of DMBC has meant that the Neighbourhood Plan has not gone forward and through the passage of time now requires modification before being formally submitted again. To this end it is believed that the plan has not been as positively prepared as it can be in taking account of local considerations.

Response:
The Local Plan has been drafted based on the emerging Thorne & Moorends Neighbourhood Plan i.e. the sites it proposes for allocation in flood zone 1 are also identified as allocations via the Local Plan. As set out in para 16.136 of the local plan, it is the Council?s current understanding that the Neighbourhood Plan is now looking to be revised to allocate additional sites in flood zone 3 before being re-submitted for Examination.
Comment:

4. Thorne Moorends Town Council is concerned that the consultation carried out in relation to the Local Plan has not been as inclusive as it could have been. There are concerns that some members of the public may have found it difficult to access a means to share their views, particularly those that do not have access to the internet who are not technically savvy with the use of websites and social media.

5. The Council believes that DMBC officers could have done more to fully engage its Parish and Town Councils in helping them to consider and evaluate the Local Plan.

Summary:

Consultation. 1. Consultation was not as inclusive as it could have been. Some members of the public are not tech savvy, are not on social media and do not have access to the internet. 2. More should have been done to engage Parish and Town Councils.

Response:

All stages of consultation have been carried out in accordance with, and often beyond the minimum requirements, as set out in the Statement of Community Involvement.
Throughout the draft Local Plan various references are made to Supplementary Planning Documents (SPDs). For example, paragraph 5.30 advises that in developing masterplans and design codes, applicants ‘must adhere to’ other relevant Local Plan policies and SPDs, whilst paragraph 7.52 states that ‘developers will be expected to provide walking provision in line with the relevant SPD’. On the Council’s ‘Supplementary Planning Documents’ page of the website, it is stated that the SPDs have been produced to provide further guidance about the implementation of specific planning policies and that they are material considerations. It is therefore not the intention that the guidance within the SPDs must be applied rigidly and that they must be adhered. This would result in an onerous and inflexible approach. Theakston Estates is concerned that the Local Plan is being used to give greater weight to the SPDs that was their original intention. Furthermore, it is considered to be inappropriate to reference an SPD in the Local Plan in advance of the SPD being prepared. It is therefore requested that reference to the SPDs are either deleted or the supporting text is amended to make it clear that the SPDs provide guidance. PROPOSED CHANGE As explained in response to question 6, it is requested that reference to the SPDs are either deleted or the supporting text is amended to make it clear that the SPDs provide guidance. This will ensure that the Plan is positively prepared and provides the most appropriate strategy through not being overly onerous. We suggest that where reference is made to SPDs at paragraphs 5.30, 7.21, 7.47, 7.52, 7.54, 12.24, that the text is amended to state that ‘developers should take into account the guidance provided within the SPD’.

### Summary:

SPD’s are referred to throughout the plan. The DMBC website states that these are further guidance about the implementation of planning policies and are material considerations. It is not therefore the intention that SPD guidance must be strictly adhered to and this would be inflexible and onerous. Theakston Estate is concerned the plan is being used to give greater weight to SPDs that originally intended, and it is inappropriate to reference an SPD in advance of it being prepared. Proposed change: references to SPDs should be removed or wording amended to make it clear these are guidance.

### Response:

All existing SPD’s will need to be reviewed in order to sit under the new local plan in due course. Likewise any new SPDs will be subject to the same process which includes consultation and provides an opportunity for any comments to be provided on such matters in due course. The glossary in the local plan is considered to be in line with that provided by NPPF i.e. they are to provide further detail to the policies in the development plan.
Third, we could not respond to the current consultation exercise by failing to raise the issue of enforcement. Whilst we concede that the primary purpose of the Local Plan is not to dictate how policy will be upheld in the real world, the enforcement process and how it is resourced will be critical to the plans delivery. Clearly there is little point in agreeing rules for the how, where, what, when etc of development if the Authority and its officers are not going to monitor, or bring to task those who do not uphold the plan’s principles. We would like to commend the plan for in places highlighting enforcement as a key issue - particularly as it relates to the Gypsy and Traveler development policy. However, highlighting enforcement in this area alone is simply not enough. Monitoring and enforcement must run through the whole document and support the whole of the plan. Without this key ingredient, developers have, and will continue to cross the lines drawn by the importance of the Local Plan. We would urge that a specific section be dedicated to enforcement to underline importance within the rural landscape. The primary start point for the policing of all developments is public reporting. By definition, urban based development is subject to higher level of public scrutiny because of its more public (urban) location. Policing and enforcement of developments within the rural landscape always suffer from the "perfect storm" of being (in the short term at least) less important to the wider borough. They are usually less visible, affect small villages or communities, are difficult or problematic for officers to access, time consuming or long term in nature. However, this should not compel those who live in rural ward to expect a lower quality service - yet it happens in all too many cases! The long-term effects of none traditional developments (mineral extraction, waste disposal, energy delivery, poor housing development etc) litter the countryside, and by example all are usually under temporary planning permission sometimes for as long as 25 years. Once development and associate revenue dries up, so does any willingness for officers of the Authority to enforce terms of restoration - usually detailed in the original planning permission to protect the environment or original landscape condition, to return to its original condition. In reality, restoration rarely happens, and rural communities continue to be blighted by abandon developments, or worse applications to turn them into landfills or some other inappropriate use. Temporary permissions should be just that - yet they are rarely just that. The plan should address this. To conclude, enforcement needs to be integrated in to the whole Local Plan. Without such, the whole document become nothing more than a dream.

Response:
Noted - enforcement has its own policy and further information can be found here: https://www.doncaster.gov.uk/services/planning/planning-enforcement
Third, we could not respond to the current consultation exercise by failing to raise the issue of enforcement. Whilst we concede that the primary purpose of the Local Plan is not to dictate how policy will be upheld in the real world, the enforcement process and how it is resourced will be critical to the plans delivery. Clearly there is little point in agreeing rules for the how, where, what, when etc of development if the Authority and it’s officers are not going to monitor, or bring to task those who do not uphold the plan’s principles. We would like to commend the plan for in places highlighting enforcement as a key issue - particularly as it relates to the Gypsy and Traveler development policy. However, highlighting enforcement in this area alone is simply not enough. Monitoring and enforcement must run through the whole document and support the whole of the plan. Without this key ingredient, developers have, and will continue to cross the lines drawn by the importance of the Local Plan. We would urge that a specific section be dedicated to enforcement to underline is importance within the rural landscape. The primary start point for the policing of all developments is public reporting. By definition, urban based development is subject to higher level of public scrutiny because of its more public (urban) location. Policing and enforcement of developments within the rural landscape always suffer from the "perfect storm" of being (in the short term at least) less important to the wider borough. They are usually less visible, affect small villages or communities, are difficult or problematic for officers to access, time consuming or long term in nature. However, this should not compel those who live in rural ward to expect a lower quality service - yet it happens in all too many cases! The long-term effects of none traditional developments (mineral extraction, waste disposal, energy delivery, poor housing development etc) liter the countryside, and by example all are usually under temporary planning permission sometimes for as long as 25 years. Once development and associate revenue dries up, so does any willingness for officers of the Authority to enforce terms of restoration - usually detailed in the original planning permission to protect the environment or original landscape condition, to return to its original condition. In reality, restoration rarely happens, and rural communities continue to be blighted by abandon developments, or worse applications to turn them into landfills or some other inappropriate use. Temporary permissions should be just that - yet they are rarely just that. The plan should address this. To conclude, enforcement needs to be integrated in to the whole Local Plan. Without such, the whole document become nothing more than a dream.
Comment:
Thank you for giving us the opportunity to comment on the above document and associated background documents. Please accept my sincere apologies for missing the consultation deadline. Whilst some of the comments/issues we raised in our previous response have been responded to in the Regulation 22 Statement, there are many others that have not and therefore we do not know what the council’s response to those comments is. We are therefore re-iterating those matters for consideration.

Summary:
Apologies for missing the deadline, notes that some of the comments from the last consultation have been addressed but there are others that have not been covered and reiterate such comments therefore.

Response:
Noted - see individual responses to the detailed comments set out on a policy-by-policy basis
1.1 These representations are made on behalf of West Moor Holdings Ltd who is the owner of the site identified as Site Reference 013 ("West Moor Park North") in the Publication Draft Local Plan. 1.2 The West Moor Park North Site is located immediately adjacent to the north-west of Junction 4 of the M18 motorway and is bounded to the south by the existing West Moor Park Industrial Estate. 1.3 Doncaster Council has published its Publication Draft Local Plan which is out for consultation until Monday 30 September 2019. 1.4 These representations relate to the omission of the West Moor Park North Site as an employment allocation for distribution warehousing and also consider the allocation of Site Reference 001 ("Thorne North") for employment use.

**Summary:**

Representation made on behalf of West Moor Holdings for site 013. The site is immediately adjacent to the north-west of M18 Junction 4 and has not been allocated in the Publication Draft Plan.

**Response:**

Noted
Comment Ref: C/Legal Context/01191/1/002
Attend Examination: Attend Hearing
Reason: TO BE ABLE TO PARTICIPATE IN THE DEBATE REGARDING STRATEGY, NEED, SUPPLY AND DISTRIBUTION OF EMPLOYMENT SITES
Area: Miscellaneous - Introductions
Policy:

Tests of Soundness:

Comment:

2.1 Section 20(5)(b) of the Planning and Compulsory Purchase Act 2004 requires an inspector (at an independent examination) to determine whether a development plan is "sound".

Summary:
Section 20(5)(b) of the Planning and Compulsory Purchase Act 2004 requires an inspector (at an independent examination) to determine whether a development plan is "sound".

Response: Noted
5.1 An assessment of the Publication Draft Local Plan and its supporting documents has been undertaken to establish whether its policies are “sound” with particular regard to the employment allocations in the Plan and the omission of the West Moor Park North Site.

**Summary:**
The West Moor Park site has previously been assessed and allocated for a distribution employment sites in earlier version of the development plan. A report to Full Council in on 7 March 2013 for the Sites and Policies DPD made it clear that West Moor Park North would have been the Council's preferred site. Although the document was withdrawn, the Inspector briefly addressed distribution warehousing and was not persuaded that the approach was inherently unsound.

**Response:**
Noted. It should be noted that this is a new plan with a new and revised evidence base in line with national guidance.
Comment:

As with previous responses our thoughts are those which respect the majority of opinion taken from our close work with local parish councils, parish meetings and gatherings of interested parties throughout the wider Sprotbrough Ward. As previously stated our previous responses community representatives continue to ask us to underline the feeling that the development of local planning policy continues to "ride roughshod" over rural community opinion. Urban centric policy ideas continue to dominate the process, and as a result, policy seeks only to solve urban centric problems, through the exploitation of rural communities, their assets, and surrounding landscapes. In relation to the current version out for consultation we would like to submit three perspective on behalf of the Sprotbrough Ward.

Summary:

As with previous responses our thoughts are those which respect the majority of opinion taken from our close work with local parish councils, parish meetings and gatherings of interested parties throughout the wider Sprotbrough Ward. As previously stated our previous responses community representatives continue to ask us to underline the feeling that the development of local planning policy continues to "ride roughshod" over rural community opinion. Urban centric policy ideas continue to dominate the process, and as a result, policy seeks only to solve urban centric problems, through the exploitation of rural communities, their assets, and surrounding landscapes. In relation to the current version out for consultation we would like to submit three perspective on behalf of the Sprotbrough Ward.

Response:

Noted
As with previous responses our thoughts are those which respect the majority of opinion taken from our close work with local parish councils, parish meetings and gatherings of interested parties throughout the wider Sprotbrough Ward. As previously stated our previous responses community representatives continue to ask us to underline the feeling that the development of local planning policy continues to "ride roughshod" over rural community opinion. Urban centric policy ideas continue to dominate the process, and as a result, policy seeks only to solve urban centric problems, through the exploitation of rural communities, their assets, and surrounding landscapes. In relation to the current version out for consultation we would like to submit three perspective on behalf of the Sprotbrough Ward.

### Response:
Noted
Comment:

3.1. Strata Homes is concerned that the Doncaster Local Plan - Publication Plan is deficient in its content and the evidence base does not reflect national guidance. Test of Soundness  
3.2. Strata Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy 
3.3. Strata Homes is concerned that the draft Local Plan does not reflect the Framework (2019). Strata Homes is concerned that the housing requirement does not reflect economic growth ambitions, the level of employment allocations, nor is it sufficient to meet the identified needs for affordable housing. Further Strata Homes are concerned that there are insufficient housing allocations to meet the housing requirement.  
3.4. Strata Homes is concerned that there is a lack of up to date, available, and robust evidence base to accompany the Plan, particularly in respect of an up to date Housing Needs Assessment, whilst a 2019 update is referred to in the Plan, it is not yet publically available, the Viability Evidence (May 2019), which requires further testing to support its conclusion, and specific evidence to justify key policies. 3.5. Strata Homes consider that the Policies in the Local Plan are not justified and does not provide an appropriate strategy. The Plan is its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 3.6. In these circumstances, Strata Homes do not consider the Doncaster Local Plan, in its current form, to be sound. 3.7. However, Strata Homes consider that the plan can be made sound subject to proposed changes as set out within the following sections of these representations. Strata Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change  
3.8. To overcome the objection and address soundness matters, the Council should: - Identify a higher housing requirement to meet economic and affordable housing ambitions and needs. - Identify sufficient supply of housing to meet the identified housing requirement. - Review and make available supporting evidence for the plan as indicated in these representations. - Review and provide additional testing in the Whole Plan Viability Report; and - Respond to the evidence and provide increased flexibility in the Plan, refer to specific proposed changes under each policy.

Summary:

The draft Local Plan does not reflect the NPPF (2019) and the housing requirement does not reflect economic growth ambitions, the level of employment allocations, nor is it sufficient to meet the identified needs for affordable housing. There are insufficient housing allocations to meet the housing requirement. There is a lack of up to date, available, and robust evidence base to accompany the Plan, particularly an up to date Housing Needs Assessment (whilst a 2019 update is referred to in the Plan, it is not yet publically available) the Viability Evidence (May 2019) (which requires further testing to support its conclusion) and specific evidence to justify key policies. Strata Homes consider that the Policies in the Local Plan are not justified and do not provide an appropriate strategy. The Plan could fail to deliver sustainable development and is not consistent with national policy. Strata Homes do not consider the Doncaster Local Plan, in its current form, to be sound. However, Strata Homes consider the plan can be made sound subject to proposed changes as set out within the following sections of these representations. To overcome the objection and address soundness matters, the Council should: - Identify a higher housing requirement to meet economic and affordable housing ambitions and needs. - Identify sufficient supply of housing to meet the identified housing requirement. - Review and make available supporting evidence for the plan as indicated in these representations. - Review and provide additional testing in the Whole Plan Viability Report; and - Respond to the evidence and provide increased flexibility in the Plan, refer to specific proposed changes under each policy.

Response:

Noted - the response provides a summary of the Representation and proposed changes which will be addressed via the individual sections/specific parts of the Representation elsewhere in the response.
This letter is submitted in response to the consultation on the Doncaster Local Plan (DLP) Publication Version and provides the comments of Gladman Developments Limited (Gladman). Gladman specialises in the promotion of strategic land for residential development with associated community infrastructure. From this experience, Gladman understands the need for the planning system to ensure that local communities have access to both decent homes and local employment opportunities. Gladman also has a wealth of experience in contributing to the Development Plan preparation process, having made representations on numerous local planning documents throughout the UK and having participated in many Local Plan public examinations. It is on the basis of this experience that these representations are made. Through this submission, Gladman have highlighted areas where the Local Plan's policies require further clarity or justification in order to be found sound at Examination, in the light of changes brought about by the Revised National Planning Policy Framework (2019) (RNPPF). Gladman would welcome the opportunity to discuss these at the Local Plan Examination in Public hearing sessions. Context The revised NPPF introduces a number of major changes to national planning policy. The changes reaffirm the Government's commitment to ensuring that up-to-date plans are in place which provide a positive vision for the areas they cover. Plans should also provide a framework for addressing housing needs and other economic, social and environmental priorities, and provide a platform for local people to shape their communities. Paragraph 35 of the RNPPF sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order for it to be found sound it is fundamental that the Doncaster Local Plan is: a) Positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; b) Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; c) Effective - deliverable over the plan period, and based on effective joint working on crossboundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and d) Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in this Framework. The potential strategy for the future development of Doncaster is now gaining clarity. It is therefore essential that these tests are carefully considered from the initial stages of local plan production.

Summary:
Introduction is made to comments made to various parts of the Local Plan summarised elsewhere; includes a summary of the soundness test requirements of NPPF

Response:
Introductory type comments to the Representation; no response needed
Comment:
0.1 These representations are made on behalf of Mr Ian Brealey in response to the Doncaster Local Plan consultation 2019. These comments follow the extensive promotion of Brodsworth Quarry, Green Lane, Doncaster for Mixed Use development during previous consultation on the Doncaster Local Plan. 0.2 This representation is made on the basis that the Doncaster Local Plan Publication draft, as prepared, contains significant deficiencies, in relation to the Site; the strategic policies and the distribution of growth. 0.3 DLP Planning Ltd is of the view that in order to provide for strategic housing requirements and sustained economic growth and regeneration of the Doncaster area, there will be a requirement for the allocation of relatively unconstrained land surrounding existing settlements to support the sustainable growth of the Borough. 0.4 It is our opinion that the level of housing and employment development discussed within this representation can only be delivered through the release of additional, unconstrained and underused sites that are attractive to the market. Such releases should be made in locations which meet other objectives such as the regeneration of Doncaster, realising the potential of airport, and the redevelopment of former mineral sites.

Summary:
The Publication Draft of the Local Plan contains significant deficiencies in relation to the site, strategic policies and the distribution of growth. In order to provide for strategic housing requirements, sustained economic growth and the regeneration of the Doncaster area there is a requirement for the allocation of unconstrained land around existing settlements. The level of housing and employment discussed in this representation can only be delivered through the release of additional, unconstrained and underused sites. Releases should be made in locations which meet other objectives such as the regeneration of Doncaster, realising the potential of the airport and the redevelopment of former mineral sites.

Response:
1.1 This Local Plan Representation has been prepared by DLP Planning Ltd on behalf of Mr Ian Brealey in response to the publication of the draft Doncaster Local Plan for consultation (Regulation 19). 1.2 The site has previously been promoted by DLP Planning Ltd through the following consultations: - Sites and Policies Development Plan Document 'Engagement Draft' - September 2012 - Call for Sites - October 2014 - Homes and Settlements - March 2016 1.3 This representation relates to "Brodsworth Quarry, Green Lane, Doncaster" (HELAA site ref 184) (Figure 1) which remains available, developable and deliverable for mixed use development (residential and employment). (SEE EMAIL FOR Figure 1. Site location) 1.4 The site is currently included within the Green Belt in the draft Local Plan document. DLP strongly objects to this designation. For the reasons set out within this representation it is recommended that the site be removed from the Green Belt and allocated for Mixed Use. 1.5 The Council has demonstrated the Exceptional Circumstances for Green Belt release within the evidence base supporting the Local Plan. Within this context, DLP has undertaken a Green Belt assessment which specifically assesses the Brodsworth Quarry site against the five purposes of the Green Belt. This assessment is referenced herein (and included at Appendix 1) to demonstrate why the site should be allocated for development. (SEE EMAIL FOR Appendices) 1.6 This representation should be read alongside the formal response form that has also been completed and submitted in relation to the site. 1.7 The structure of this representation will be as follows: - Comments on the draft Local Plan in Section 2; - Site Assessment in Section 3; and - Conclusion in Section 4.

Summary:
Brodsworth Quarry on Green lane, Doncaster remains available, developable and deliverable for mixed use development (residential and employment) (see Figure 1: Site location). The site is currently within the Green Belt and DLP strongly object to this designation. The site should be removed from the Green Belt and allocated for Mixed Use. The Council has demonstrated the exceptional circumstances for Green Belt release within the Local Plan evidence base. DLP has undertaken a Green belt assessment which assesses the Brodsworth Quarry against the five purposes of the Green Belt (email includes Green Belt Assessment)
1.1 This representation is made on behalf of Bellway Homes (Yorkshire) and Mr D Higgins (as landowner) in response to the Doncaster Local Plan Publication Consultation in relation to the Higgin’s Site, Old Bawtry Road, Finningley (Figure 1). The site is identified under draft Local Plan site reference ‘189 - Higgins Agriculture Ltd, Old Bawtry Road, Finningley’. (SEE EMAIL FOR Figure 1. Location Plan) 1.2 The site has previously been promoted for residential development by DLP Planning at the following stages:  - Sites and Policies Development Plan Document - September 2013  - Call for Sites - October 2014  - Issues and Options - Summer 2015  - Vision, aims and objectives - Summer 2015  - Homes and Settlements - April 2016  1.3 The site is a partial brownfield parcel of land, sustainably located adjacent to the Finningley settlement boundary. The site is also immediately adjacent to Doncaster Sheffield Airport, which is specifically identified as a key driver of economic growth during the proposed local plan period.  1.4 Despite this, the site is indicated to be retained within a Countryside Policy Area in the draft Local Plan. DLP strongly objects to the omission of the site from the proposed Housing and/or potentially Employment allocations.  1.5 To this end, Section 2 of this representation considers the strategic approach to housing and employment delivery within the Publication Local Plan, objecting to the policies as drafted and providing recommendations regarding the level of housing as set out in the draft Local Plan, in order to ensure the soundness of the plan. A number of objections are also raised and recommendations provided on other relevant draft policies.  1.6 Section 3 goes on to provide a detailed site-specific assessment of the Higgin’s Site (Site 189) in order to demonstrate the capacity, suitability and deliverability of the site for development in order to support the Local Plan objectives.  1.7 Section 4 confirms the primary objections raised in the representation and recommends that the land at the Higgin’s Site, Finningley should be identified as a Housing allocation, in order to meet the housing need in the Borough. This approach will ensure the plan I positively prepared and sound in accordance with the National Planning Policy Framework (2019).
1. Spawfords have been instructed by H. Burtwistle & Son to submit representations to the Doncaster Local Plan 2015-2035 Publication Version, for their site at Coulman Road, Thorne. 1.2. Appended to these representations is a report assessing the housing requirement, prepared by Regeneris Consulting. (SEE EMAIL FOR Regeneris Report) 1.3. H. Burtwistle & Son welcome the opportunity to contribute to the emerging Local Plan for Doncaster and is keen to further the role of Doncaster within the Sheffield City Region, South Yorkshire and the Yorkshire and Humber Region as a whole. 1.4. H. Burtwistle & Son has significant land interests in the area, which can positively contribute towards the economic and housing growth agenda. 1.5. H. Burtwistle & Son would like to make comments on the following topics and sections in the Doncaster Local Plan 2015-2035 Publication Version: - General Comments - Policy 2 - Spatial strategy and settlement hierarchy - Policy 3 - Level and distribution of growth - Policy 6 - Housing Allocations - Sites 244/331: Coulman Road, Thorne - Policy 8 - Delivering the necessary range of housing - Policy 19 - Development affecting public rights of way - Policy 20 - Access, design and layout of public rights of way - Policy 29 - Open space provision in new developments - Policy 46 - Housing design standards - Policy 66 - Developer contributions - Policy 67 - Development viability 1.6. In each case, observations are set out with reference to the provisions of the Framework and where necessary, amendments are suggested to ensure that the Local Plan is found sound. 1.7. H. Burtwistle & Son welcomes the opportunity for further engagement and the opportunity to appear at the Examination in Public. 1.8. We trust that you will confirm that these representations are duly considered to these comments. 1.9. Please do not hesitate to contact us to discuss any issues raised in this Representation further.

Summary:

General 1. Housing requirement does not reflect the growth ambitions or the level of employment allocations. 2. Housing requirement does not meet the need for affordable housing. 3. Lack of an up to date housing needs assessment. 4. Local Plan in current form is not consistent with national Policy. Proposed changes: 1. Higher housing requirement 2. Review of supporting evidence 3. Additional 'whole plan viability report' required. 4. Increased flexibility. Policy 2 - Spatial strategy and Settlement Hierarchy. 1. Distribution of housing should be reviewed and include more at service towns and villages. 2. Defined villages should have some growth. 3. Rossington/Thorne Moorhouses/Carcroft Skellow should have a greater share. 4. This would be a more sustainable approach. Reserve sites 1. The identified sites have significant technical constraints. 2. They are not a suitable pool of sites. 3. Object to them being in the Plan. Greenbelt Boundaries 1. Boundaries as drawn are too tight. 2. Likely they will need re-drawing at next review of plan. Safeguarded land 1. Not an adequate amount of safeguarded Land. 2. Should be identified across the spatial hierarchy. Proposed changes: 1. Policy should reflect economic and housing growth aspirations. 2. Spatial strategy should be amended. 3. Identify safeguarded land or suitable reserve sites. Policy 3 - Level and Distribution of Growth. 1. Housing requirement not sufficient and not aligned with forecast economic growth. 2. Plan identifies more employment land than target. 3. Mismatch between employment land allocated and level of housing allocated. 4. Housing requirement - have commissioned own report by 'Regeneris Consulting' for OAN and economic forecasts (enclosed as Appendix) 5. Housing requirement should be 1,100 dpa (Regeneris) 6. Peter Brett forecast is for 2015-2032 - not clear if provision is made for 2032 to 2035. 7. There is a discrepancy in employment land allocated. Provision is 565.77 Ha against 481 requirement (para 5.21). 8. Employment allocation is 83.77 above requirement therefore need more housing. 9. Estimate circa 7,532 additional homes are required to balance emp/hsg requirement. 10. Recent high housing delivery rates and evidence from Employment land Needs Assessment (2019 update) suggest a higher housing need requirement (based on the success of the 2015-18 period) 11. Concerned that affordable housing rates are not viable. 12. 920 will not deliver sufficient affordable housing. 13. Requirement would need to be 1,393 dpa to meet 15% requirement (based on last 3 years of monitoring). 14. Housing requirement should be at least 1,100. 15. Current completions (2015-18) are gross and not net. 16. Plan will struggle with supply late in the plan period. 17. Evidence base needs updating - no HELA or RLA for 2019. 18. Existing commitments - assumes 100% delivery - a discount should be applied for some non delivery. 19. Concerned about viability/deliverability of several sites with PP (list the sites) 20. Some of the allocations are a deliverability risk (includes list and comments on sites) 21. Need to be more realistic on delivery rates. 22. Should review existing commitments to ensure deliverability. 23. Propose site 244 & 331 Coulman Road for allocation. Proposed Changes: 1. Increase housing requirement to 1,100 - 1,300 dpa. 2. Reduce the potential from current commitments. 3. Include a none delivery allowance. 4. Identify safeguarded land 5. Allocate sites 244 & 331. Policy 6 Housing allocations 1. Under provision in Thorne and Moorwoods 2. Site 244 & 331 should be allocated (in depth advocacy for sites included). 3. Object to allocation of sites 81, 343, 795, 510 (various reasons but mainly deliverability) Policy 8 - Delivering the necessary range of housing - SHMA and Housing needs study are out of date - evidence base needs updating. Housing Mix 1. Lack of evidence for approach taken. 2. Local Plan should not seek to control the housing mix - to prescriptive. 3. This aspect of policy should 'encourage' rather than require. 4. Flexible approach should be taken - need to vary rea to area. 5. Mix in Policy has not been appropriately viability tested. Affordable Housing 1. Little evidence to support target of 15% in low value areas. 2. Little justification of the 23% target. 3. The need for regular viability assessment could undermine deliverability. 4. Unrealistic to negotiate each site on a one by one basis - could jeopardise delivery. 5. Policy needs to reflect NPPF 2019. Adaptable and Accessible Homes 1. Re Part D 2. Support principles of policy but does not consider it appropriate to require all developments to include this provision. 3. Should be a more flexible approach, Custom and self-build Homes 1. Further evidence needed of the level of demand. 2. Para 6.3 provides little explanation as to evidence to support the policy. 3. Should be a more flexible approach. Policy 19 - Development affecting Public Rights of Way. 1. Concerned with Part D 2. Approach to
none definitive footpaths is onerous and restrictive and could hinder delivery. 3. Should incorporate some flexibility. Policy 20 - Access, design and layout of Public Rights of way. 1. Parts B&C restrictive and could hinder development. 2. Incorporate some flexibility or remove restrictive elements. Policy 29 - Open space Provision. 1. Level of Green space requirement could impact on deliverability. 2. Part B - commuted sums -this is excessive, could undermine deliverability. 3. Policy not consistent with Policies 66 & 67 re open space requirements. 4. Flexibility need to accord with policies 66 & 67. 5. Amend Parts A & B (and para 10.22 & 10.25) to 'encourage' rather than 'require'. Policy 46 - Housing Design Standards. 1. Policy could impact on deliverability and viability. 2. Part A - national space Standards - no evidence to justify implementation. 3. Remove or increase flexibility 4. Part B - remove or reduce the requirement (65% of all new homes to be accessible/adaptable). Policy 66 - Developer Contributions. 1. Should not impact on viability. 2. Need for viability assessment of schemes on a regular basis could undermine deliverability. 3. Review and update viability assessment and then modify policy requirements accordingly. Policy 67 - Development Viability. 1. Policy is an impediment to development and compromises deliverability. 2. Viability assessment should be reviewed and updated. 3. Provide clarity in Part B or remove trigger points - they are a burden on development.

Response:

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Tests of Soundness:

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Comment:

1.1. Spawforths have been instructed by H. Burtwistle & Son to submit representations to the Doncaster Local Plan 2015-2035 Publication Version, for their site at Northgate, Moorends. 1.2. Appended to these representations is a report assessing the housing requirement, prepared by Regeneris Consulting. (SEE EMAIL FOR Regeneris Report) 1.3. H. Burtwistle & Son welcome the opportunity to contribute to the emerging Local Plan for Doncaster and is keen to further the role of Doncaster within the Sheffield City Region, South Yorkshire and the Yorkshire and Humber Region as a whole. 1.4. H. Burtwistle & Son has significant land interests in the area, which can positively contribute towards the economic and housing growth agenda. 1.5. H. Burtwistle & Son would like to make comments on the following topics and sections in the Doncaster Local Plan 2015-2035 Publication Version: - General Comments - Policy 2 - Spatial strategy and settlement hierarchy - Policy 3 - Level and distribution of growth - Policy 6 - Housing Allocations - Sites 313/245: Northgate, Moorends - Policy 8 - Delivering the necessary range of housing - Policy 19 - Development affecting public rights of way - Policy 20 - Access, design and layout of public rights of way - Policy 29 - Open space provision in new developments - Policy 46 - Housing design standards - Policy 66 - Developer contributions - Policy 67 - Development viability 1.6. In each case, observations are set out with reference to the provisions of the Framework and where necessary, amendments are suggested to ensure that the Local Plan is found sound. 1.7. H. Burtwistle & Son welcomes the opportunity for further engagement and the opportunity to appear at the Examination in Public. 1.8. We trust that you will confirm that these representations are duly made and will give due consideration to these comments. 1.9. Please do not hesitate to contact us to discuss any issues raised in this Representation further.

Summary:

Reps are provided by Spawforths on behalf of H Burtwistle & Son and in respect to their landholdings at Northgate, Moorends.

Response:
Tests of Soundness: Justified

Comment:
We have been instructed on behalf of the Sandbeck Estate, who are landowners within the Borough, to submit a response to the Doncaster Local Plan Regulation 19 Consultation. Our client's interest is in respect of the settlements of 'Tickhill' and 'Stainton'. We previously submitted representations to the Regulation 18 Consultations promoting these sites and we reiterate some of this evidence again. Furthermore, we have prepared additional evidence in the form of a 'Comparative Landscape and Green Belt Assessment' which compares our client's site at Wong Lane to the Regulation 19 Local Plan preferred site (Sunderland Street) in terms of Green Belt purposes (See Appendix B). Our comments focus on the settlements of Tickhill and Stainton. The Sandbeck Estate is committed to working alongside Doncaster Metropolitan Borough Council to bring forward deliverable sites under its ownership. Please see Appendix A for a Location Plan of the five sites. We therefore suggest that several changes should be made to the aforementioned draft strategies and policies before the Plan could be considered sound. We also propose that "Land off Lindrick Lane, Tickhill" (HELAA Reference Site 356), "Land off Wong Lane, Tickhill" (HELAA Reference Site 357) and Land at Stud Farm, Tickhill" (No current HELAA Reference) are deleted from the Green Belt and allocated for housing development in Tickhill over the plan period. The site at Sunderland Road - the Local Plan's preferred site should be removed. We also support the future allocation of "Manor Farm" and "Land to North of Limekiln Lane" at Stainton. Our suggested changes (and associated justification) to the Local Plan policies and proposals are set out in Section 2 below. (SEE EMAIL FOR Appendices) (NOTE THIS REP IS FOR SITE 356 AND THE OTHER COMMENTS ARE ONLY THOSE WHICH REFER TO THIS SITE, THE COMMENTS FOR THE OTHER SITES ARE INCLUDED UNDER THEIR REFNUMBER - SEE: 03569 / 03570 / 03571 / 04705)

Summary:
Comments made regarding Site 356 - Land off Lindrick Lane, Tickhill, which are combined with comments made and summarised elsewhere.

Response:
The site has been assessed as having a weak case in Green Belt terms and there are reservations about access from Lindrick Lane. Every effort has been made to find suitable sites in Tickhill but there are a number of constraints which hamper this. The shortfall can be made up elsewhere. The Green Belt review carried out is independent and applies a consistent methodology.
Some land within our client's ownership was assessed as part of the HELAA evidence base. Our client's sites at Tickhill and Stainton are set out below. The sites are known as: - "Land off Wong Lane, Tickhill" - HELAA Site 357; - "Land off Lindrick Lane, Tickhill" - HELAA Site 356; - "Land at Stud Farm, Tickhill" (not assessed in the 2017 HELAA) - "Land at Manor Farm, Stainton" - HELAA Site 359 - "Land North of Limekiln Lane, Stainton" - HELAA Site 358  Sites 356, 357, 358 & 359 were all identified as Deliverable / Developable Sites in the HELAA and therefore there were no physical or technical reasons as to why the sites could not come forward for residential development (the only constraint being that the land lies within Green Belt). In conclusion, following the assessment of the sites in the Doncaster HELAA update, we consider that our clients land should be deleted from the Green Belt, where necessary and allocated as housing sites in the Local Plan. Our comments with regard to individual sites are in respect of the settlements of Tickhill and Stainton. (NOTE THIS REP IS FOR SITE 356 AND THE OTHER COMMENTS ARE ONLY THOSE WHICH REFER TO THIS SITE, THE COMMENTS FOR THE OTHER SITES ARE INCLUDED UNDER THEIR REFNUMBER - SEE: 03569 / 03570 / 03571 / 04705)

| Test of Soundness: | Justified |

**Summary:**

Comments made regarding Site 356 - Land off Lindrick Lane, Tickhill, which are combined with comments made and summarised elsewhere.

**Response:**

The site has been assessed as having a weak case in Green Belt terms and there are reservations about access from Lindrick Lane. Every effort has been made to find suitable sites in Tickhill but there are a number of constraints which hamper this. The shortfall can be made up elsewhere. The Green Belt review carried out is independent and applies a consistent methodology.
Comment Ref: C/Introduction/03569/1/001

Attend Examination: Not Stated

Reason:

Area: Miscellaneous - Introductions

Policy:

Tests of Soundness:

Justified

Comment:

We have been instructed on behalf of the Sandbeck Estate, who are landowners within the Borough, to submit a response to the Doncaster Local Plan Regulation 19 Consultation. Our client's interest is in respect of the settlements of 'Tickhill' and 'Stainton'. We previously submitted representations to the Regulation 18 Consultations promoting these sites and we reiterate some of this evidence again. Furthermore, we have prepared additional evidence in the form of a 'Comparative Landscape and Green Belt Assessment' which compares our client's site at Wong Lane to the Regulation 19 Local Plan preferred site (Sunderland Street) in terms of Green Belt purposes (See Appendix B). Our comments focus on the settlements of Tickhill and Stainton. The Sandbeck Estate is committed to working alongside Doncaster Metropolitan Borough Council to bring forward deliverable sites under its ownership. Please see Appendix A for a Location Plan of the five sites. We therefore suggest that several changes should be made to the aforementioned draft strategies and policies before the Plan could be considered sound. We also propose that "Land off Lindrick Lane, Tickhill" (HELAA Reference Site 356), "Land off Wong Lane, Tickhill" (HELAA Reference Site 357) and Land at Stud Farm, Tickhill" (No current HELAA Reference) are deleted from the Green Belt and allocated for housing development in Tickhill over the plan period. The site at Sunderland Road - the Local Plan's preferred site should be removed. We also support the future allocation of "Manor Farm" and "Land to North of Limekiln Lane" at Stainton. Our suggested changes (and associated justification) to the Local Plan policies and proposals are set out in Section 2 below. (SEE EMAIL FOR Appendices) (NOTE THIS REP IS FOR SITE 357 AND THE OTHER COMMENTS ARE ONLY THOSE WHICH REFER TO THIS SITE, THE COMMENTS FOR THE OTHER SITES ARE INCLUDED UNDER THEIR REFNUMBER - SEE: 03568 / 03570 / 03571 / 04705)

Summary:

Comments made regarding Site 357 - Land off Wong Lane, Tickhill, which are combined with comments made and summarised elsewhere.

Response:

The site has been assessed as having a moderately weak case in Green Belt terms, and it is not felt suitable access can be created, given this site would join the corner of Wong Lane (either via a new access or Wilsic Lane - Greystone Lane is an unmade farm track), which is a 'U' shaped bend. The Green Belt review carried out is independent and applies a consistent methodology.
Some land within our client's ownership was assessed as part of the HELAA evidence base. Our client's sites at Tickhill and Stainton are set out below. The sites are known as: - "Land off Wong Lane, Tickhill" - HELAA Site 357; - "Land off Lindrick Lane, Tickhill" - HELAA Site 356; - "Land at Stud Farm, Tickhill" (not assessed in the 2017 HELAA) - "Land at Manor Farm, Stainton" - HELAA Site 359 - "Land North of Limekiln Lane, Stainton" - HELAA Site 358 Sites 356, 357, 358 & 359 were all identified as Deliverable / Developable Sites in the HELAA and therefore there were no physical or technical reasons as to why the sites could not come forward for residential development (the only constraint being that the land lies within Green Belt). In conclusion, following the assessment of the sites in the Doncaster HELAA update, we consider that our clients land should be deleted from the Green Belt, where necessary and allocated as housing sites in the Local Plan. Our comments with regard to individual sites are in respect of the settlements of Tickhill and Stainton. (NOTE THIS REP IS FOR SITE 357 AND THE OTHER COMMENTS ARE ONLY THOSE WHICH REFER TO THIS SITE, THE COMMENTS FOR THE OTHER SITES ARE INCLUDED UNDER THEIR REFERNCES - SEE: 03568 / 03570 / 03571 / 04705)

Comments made regarding Site 357 - Land off Wong Lane, Tickhill, which are combined with comments made and summarised elsewhere.

Response:
The site has been assessed as having a moderately weak case in Green Belt terms, and it is not felt suitable access can be created, given this site would join the corner of Wong Lane (either via a new access or Wilsic Lane - Greystone Lane is an unmade farm track), which is a 'U' shaped bend. The Green Belt review carried out is independent and applies a consistent methodology.
Comment:
We have been instructed on behalf of the Sandbeck Estate, who are landowners within the Borough, to submit a response to the Doncaster Local Plan Regulation 19 Consultation. Our client's interest is in respect of the settlements of 'Tickhill' and 'Stainton'. We previously submitted representations to the Regulation 18 Consultations promoting these sites and we reiterate some of this evidence again. Furthermore, we have prepared additional evidence in the form of a 'Comparative Landscape and Green Belt Assessment' which compares our client's site at Wong Lane to the Regulation 19 Local Plan preferred site (Sunderland Street) in terms of Green Belt purposes (See Appendix B). Our comments focus on the settlements of Tickhill and Stainton. The Sandbeck Estate is committed to working alongside Doncaster Metropolitan Borough Council to bring forward deliverable sites under its ownership. Please see Appendix A for a Location Plan of the five sites. We therefore suggest that several changes should be made to the aforementioned draft strategies and policies before the Plan could be considered sound. We also propose that "Land off Lindrick Lane, Tickhill" (HELAA Reference Site 356), "Land off Wong Lane, Tickhill" (HELAA Reference Site 357) and Land at Stud Farm, Tickhill" (No current HELAA Reference) are deleted from the Green Belt and allocated for housing development in Tickhill over the plan period. The site at Sunderland Road - the Local Plan's preferred site should be removed. We also support the future allocation of "Manor Farm" and "Land to North of Limekiln Lane" at Stainton. Our suggested changes (and associated justification) to the Local Plan policies and proposals are set out in Section 2 below. (SEE EMAIL FOR Appendices) (NOTE THIS REP IS FOR SITE 358 AND THE OTHER COMMENTS ARE ONLY THOSE WHICH REFER TO THIS SITE, THE COMMENTS FOR THE OTHER SITES ARE INCLUDED UNDER THEIR REFNUMBER - SEE: 03568 / 03569 / 03571 / 04705)

Summary:
Comments made regarding Site 358 - Land north of Limekiln Lane, Stainton, which are combined with comments made and summarised elsewhere.

Response:
Some land within our client's ownership was assessed as part of the HELAA evidence base. Our client's sites at Tickhill and Stainton are set out below. The sites are known as: - "Land off Wong Lane, Tickhill" - HELAA Site 357; - "Land off Lindrick Lane, Tickhill" - HELAA Site 356; - "Land at Stud Farm, Tickhill" (not assessed in the 2017 HELAA) - "Land at Manor Farm, Stainton" - HELAA Site 359 - "Land North of Limekiln Lane, Stainton" - HELAA Site 358 Sites 356, 357, 358 & 359 were all identified as Deliverable / Developable Sites in the HELAA and therefore there were no physical or technical reasons as to why the sites could not come forward for residential development (the only constraint being that the land lies within Green Belt). In conclusion, following the assessment of the sites in the Doncaster HELAA update, we consider that our clients land should be deleted from the Green Belt, where necessary and allocated as housing sites in the Local Plan. Our comments with regard to individual sites are in respect of the settlements of Tickhill and Stainton. (NOTE THIS REP IS FOR SITE 358 AND THE OTHER COMMENTS ARE ONLY THOSE WHICH REFER TO THIS SITE, THE COMMENTS FOR THE OTHER SITES ARE INCLUDED UNDER THEIR REFNUMBER - SEE: 03568 / 03569 / 03571 / 04705)
With regard to Stainton, our client has two sites that are considered suitable for future residential development. The two sites are: 1. "Land at Manor Farm, Stainton" - HELAA Site 359; and, 2. "Land North of Limekiln Lane, Stainton" - HELAA Site 358. These two sites are set out below respectively. (NOTE THIS REP IS FOR SITE 358 THE COMMENTS FOR THE OTHER SITE IS INCLUDED UNDER THEIR REF NUMBER - SEE: 03571)

Summary:

Comments made regarding Site 358 - Land north of Limekiln Lane, Stainton, which are combined with comments made and summarised elsewhere.
We have been instructed on behalf of the Sandbeck Estate, who are landowners within the Borough, to submit a response to the Doncaster Local Plan Regulation 19 Consultation. Our client’s interest is in respect of the settlements of 'Tickhill' and 'Stainton'. We previously submitted representations to the Regulation 18 Consultations promoting these sites and we reiterate some of this evidence again. Furthermore, we have prepared additional evidence in the form of a 'Comparative Landscape and Green Belt Assessment' which compares our client's site at Wong Lane to the Regulation 19 Local Plan preferred site (Sunderland Street) in terms of Green Belt purposes (See Appendix B). Our comments focus on the settlements of Tickhill and Stainton. The Sandbeck Estate is committed to working alongside Doncaster Metropolitan Borough Council to bring forward deliverable sites under its ownership. Please see Appendix A for a Location Plan of the five sites. We therefore suggest that several changes should be made to the aforementioned draft strategies and policies before the Plan could be considered sound. We also propose that "Land off Lindrick Lane, Tickhill" (HELAA Reference Site 356), "Land off Wong Lane, Tickhill" (HELAA Reference Site 357) and Land at Stud Farm, Tickhill" (No current HELAA Reference) are deleted from the Green Belt and allocated for housing development in Tickhill over the plan period. The site at Sunderland Road - the Local Plan’s preferred site should be removed. We also support the future allocation of "Manor Farm" and "Land to North of Limekiln Lane" at Stainton. Our suggested changes (and associated justification) to the Local Plan policies and proposals are set out in Section 2 below. (SEE EMAIL FOR Appendices) (NOTE THIS REP IS FOR SITE 359 AND THE OTHER COMMENTS ARE ONLY THOSE WHICH REFER TO THIS SITE, THE COMMENTS FOR THE OTHER SITES ARE INCLUDED UNDER THEIR REFN - SEE: 03568 / 03569 / 03570 / 04705)

**Summary:**
Comments made regarding Site 359 - Land at Manor Farm, Stainton, which are combined with comments made and summarised elsewhere.

**Response:**

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### Tests of Soundness
- Justified

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### Comment
We have been instructed on behalf of the Sandbeck Estate, who are landowners within the Borough, to submit a response to the Doncaster Local Plan Regulation 19 Consultation. Our client’s interest is in respect of the settlements of 'Tickhill' and 'Stainton'. We previously submitted representations to the Regulation 18 Consultations promoting these sites and we reiterate some of this evidence again. Furthermore, we have prepared additional evidence in the form of a 'Comparative Landscape and Green Belt Assessment' which compares our client’s site at Wong Lane to the Regulation 19 Local Plan preferred site (Sunderland Street) in terms of Green Belt purposes (See Appendix B). Our comments focus on the settlements of Tickhill and Stainton. The Sandbeck Estate is committed to working alongside Doncaster Metropolitan Borough Council to bring forward deliverable sites under its ownership. Please see Appendix A for a Location Plan of the five sites. We therefore suggest that several changes should be made to the aforementioned draft strategies and policies before the Plan could be considered sound. We also propose that "Land off Lindrick Lane, Tickhill" (HELAA Reference Site 356), "Land off Wong Lane, Tickhill" (HELAA Reference Site 357) and Land at Stud Farm, Tickhill" (No current HELAA Reference) are deleted from the Green Belt and allocated for housing development in Tickhill over the plan period. The site at Sunderland Road - the Local Plan’s preferred site should be removed. We also support the future allocation of "Manor Farm" and "Land to North of Limekiln Lane" at Stainton. Our suggested changes (and associated justification) to the Local Plan policies and proposals are set out in Section 2 below. (SEE EMAIL FOR Appendices) (NOTE THIS REP IS FOR SITE 359 AND THE OTHER COMMENTS ARE ONLY THOSE WHICH REFER TO THIS SITE, THE COMMENTS FOR THE OTHER SITES ARE INCLUDED UNDER THEIR REFN - SEE: 03568 / 03569 / 03570 / 04705)
Some land within our client’s ownership was assessed as part of the HELAA evidence base. Our client's sites at Tickhill and Stainton are set out below. The sites are known as:

- “Land off Wong Lane, Tickhill” - HELAA Site 357;
- “Land off Lindrick Lane, Tickhill” - HELAA Site 356;
- “Land at Stud Farm, Tickhill” (not assessed in the 2017 HELAA);
- “Land at Manor Farm, Stainton” - HELAA Site 359;
- “Land North of Limekiln Lane, Stainton” - HELAA Site 358

Sites 356, 357, 358 & 359 were all identified as Deliverable / Developable Sites in the HELAA and therefore there were no physical or technical reasons as to why the sites could not come forward for residential development (the only constraint being that the land lies within Green Belt). In conclusion, following the assessment of the sites in the Doncaster HELAA update, we consider that our clients land should be deleted from the Green Belt, where necessary and allocated as housing sites in the Local Plan. Our comments with regard to individual sites are in respect of the settlements of Tickhill and Stainton. (NOTE THIS REP IS FOR SITE 359 AND THE OTHER COMMENTS ARE ONLY THOSE WHICH REFER TO THIS SITE, THE COMMENTS FOR THE OTHER SITES ARE INCLUDED UNDER THEIR REFNUMBER - SEE: 03568 / 03569 / 03570 / 04705)

Comments made regarding Site 359 - Land at Manor Farm, Stainton, which are combined with comments made and summarised elsewhere.
With regard to Stainton, our client has two sites that are considered suitable for future residential development. The two sites are: 1. "Land at Manor Farm, Stainton" - HELAA Site 359; and, 2. "Land North of Limekiln Lane, Stainton" - HELAA Site 358. These two sites are set out below respectively. (NOTE THIS REP IS FOR SITE 359 THE COMMENTS FOR THE OTHER SITE IS INCLUDED UNDER THEIR REFNUMBER - SEE: 03570)

Summary:
Comments made regarding Site 359 - Land at Manor Farm, Stainton, which are combined with comments made and summarised elsewhere.

Response:
Comment:
Thank you for your consultation on the above which was received by Natural England on 12 August 2019. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Overall, Natural England considers the Doncaster Local Plan to be legally compliant and in accordance with the relevant tests of soundness. Natural England does have the following comments to make on the Doncaster Local Plan Publication.

Summary:
Introduction is made to comments made to various parts of the Local Plan summarised elsewhere.

Response:
The Joint Rural Parishes (JRP), which represents the rural communities to the west of Doncaster, held a number of meetings to formulate a joint response to the Doncaster Local Plan 2015-2035, which is being examined by the Inspector on its soundness and legal compliance. This submission should be considered a general overview which reflects the majority opinion and key concerns of the following communities: Barnburgh and Harlington, Brodsworth incl. Green Lane, Cadeby, Clayton and Frickley, Hickleton, High Melton, Hooton Pagnell, Skelbrooke and Hampole, Marr and Pickburn. In addition Parishes may also submit responses on issues that are more specific to their individual community.

Consideration has been given to the Local Plan in its entirety, including the Appendices, HELAA, Settlement Background Paper, Settlement Audit, Local Plan Evidence Base, Doncaster Infrastructure Strategy, Green Belt Topic Paper, Green Belt Stage 3 Site Summaries, Vision, Aims and Objectives 2015, Section 106 Monitoring Report, Interactive Maps and NPPF March 2019. The JRP has agreed that the Local Plan has been positively prepared, effective and consistent with national policy, though it has reservations about its effectiveness, which will be explained more fully in the text.

Summary:
Introduction is made to comments made to various parts of the Local Plan summarised elsewhere.

Response:
Noted
Comment Ref: C/Introduction/04288/1/001

Attend Examination: Attend Hearing

Area: Miscellaneous - Introductions

Policy:

Tests of Soundness: Justified Effective Consistent with national

1.1 This report is prepared by Turley on behalf of our clients the Peel Group and Doncaster Sheffield Airport Limited (hereafter referred to as "Peel/DSA"). It provides representations to Doncaster Council (DC) in respect of the Proposed Publication Version Local Plan (LP) which is currently the subject of public consultation. 1.2 The Report has been prepared in general support of the LP and in particular draft policy 7 which supports the expansion of Doncaster Sheffield Airport (DSA). It does though provide suggested modifications to the wording of the draft policy (and its supporting justification) to ensure it aligns with the ambitions and objectives of Peel/DSA and its draft Airport Masterplan (DSAM). However, there are elements of the LP which are considered to be unsound as they are not justified, effective or consistent with national planning policy. As a result, Peel considers that several modifications are necessary to make the LP sound. This relates to other policies including draft spatial policy 3 relating to housing provision and the proposed policy on the open countryside. Other modifications are sought on a number of non-strategic policies. Moreover, the representations also seek to rectify deficiencies and inconsistencies in the LP, including omission sites. In this respect, land east of Gatehouse Lane is proposed within the draft DSAM for residential development and accordingly, the Regulation 18 Consultation in October 2018 identified it as a Late Housing Site (not yet assessed) with a reference number of 1010. A residential allocation has been requested, however notwithstanding it appearing as an unassessed housing site in October 2018, the LP now proposes that it remains in countryside. We comment further on this at paragraphs 5.8 and 9.1 below. 1.3 The remainder of this representation is structured as follows: - Chapter 2: provides a summary of the Peel Group and the regional economic framework which supports the growth of DSA; - Chapter 3: provides an overview of DSA and its vision for growth as articulated through the draft DSAM; - Chapters 4-6: consider specific LP policies; - Chapter 7: considers sites that are identified within the DSAM but are omitted from the LP by the absence of a positive land allocation; and - Chapter 8: provides summary and conclusions.

Summary:

General support for Policy 7, but suggest modified policy wording and supporting text wording to ensure in aligns with the ambitions of the Airport owners and the Airport masterplan. Elements of the Local Plan are considered unsound and several modifications are required to make it sound. There are also omitted sites that should be included, such as land to the East of Gatehouse Lane.

Response:

Introductory type comments - specific detailed aspects of the Representation will be picked up through the subsequent parts of this summary/response document.
2.1 The Peel Group is one of the leading infrastructure, real estate and investment enterprises in the UK. Peel operates a diverse network of businesses, ranging from ports to airports; land to leisure; media to hotels; wind farms to biomass, and holds a portfolio of investments in major public companies. 2.2 Peel is passionate about the growth, regeneration and prosperity of the North. It has worked with partners in the private and public sectors to drive economic growth in the North of England. Peel is excited by the Government's plans to build a Northern Powerhouse. 2.3 It believes that it is important to plan for economic growth at local, city region, and pan-regional levels. In 2008, Peel launched "Ocean Gateway" which brings together its assets across Liverpool, Cheshire and Manchester and seeks to redefine the economic role the combined area would have for the UK. Since 2010, Peel and other partners have supported "Atlantic Gateway" - a broader economic growth and regeneration programme across this area. By combining its key assets with those of the major partners working to support the LEPs, an even more ambitious programme of economic growth has developed. In 2013, a review of the first five years of Ocean/Atlantic Gateway recorded a direct investment of #2bn, annual Gross Added Value (GVA) of #466m and over 10,000 net additional jobs. 2.4 Government priorities in creating a Northern Powerhouse include stimulating economic growth, raising productivity, and improving connectivity. Peel support these objectives and is keen to explore how their aspirations and key projects can align across the North of England to help deliver a Northern Powerhouse. Peel believes that the Northern Powerhouse has the potential to: - improve connectivity, locally, nationally and internationally, for people and freight - create more private sector jobs - rebalance the economy and close the 'North-South divide' - improve skills, education and training - retain talented workers in the North and attract new talent - deliver more and better housing - be economically self-sufficient and reduce state dependency - drive urban regeneration - create great places to live and work - champion environmental quality 2.5 Peel wishes to be a key investor partner in delivering the Northern Powerhouse. In 2015 Peel launched "Peel in the Northern Powerhouse", a statement of commitment to partnership in helping deliver the Northern Powerhouse. It features 150 projects across the North of England which can be part of the economic and social transformation which Government seeks. 2.6 One of these 150 projects is the continued planned expansion of DSA. Indeed the Government itself clearly recognises the role the airport can play in delivering a Northern Powerhouse: 2.7 "The International gateway to Sheffield City Region for passengers and part of the logistics hub. Over #113m is currently being invested to improve its surface connectivity which will increase passenger numbers, and hence heighten its strategic significance and GVA benefits to the north."

2.6.1 One North: A Proposition for an Interconnected North (HM Government, July 2014) The Regional Economic Framework 2.8 The Sheffield City Region (SCR) Strategic Economic Plan (SEP) sets an ambitious target to increase GVA within the City Region by #3.1bn by 2025. Achieving this ambition will strengthen SCR's contribution to the national economy and its role within the Northern Powerhouse. It targets 70,000 net additional jobs within SCR and it identifies seven long term spatial areas of growth and change where a significant proportion of growth is expected to occur. 2.9 One of the seven SCR areas of growth and change is the Doncaster Sheffield Airport corridor which is: "Recognised as a catalyst for business development, inward investment and job creation with regard to logistics, engineering and associated aviation activities." 2.10 It is crucial the LP fully aligns with the objectives of the SEP. 2.11 To support the SCR SEP, an Integrated Infrastructure Plan (IIP) has been published. The IIP articulates and evidences required infrastructure, spatial requirements linked to supporting the economic priority areas identified in the SEP. In essence, it seeks to provide the infrastructure necessary to create the best opportunities for economic growth, jobs and homes, to create the best attractive environments for businesses and residents. To focus investment, the IIP identifies a number of strategic spatial priorities: 1. Growth of the advanced manufacturing innovation district; 2. Provide growth and enhance the role of DSA and the surrounding area; 3. Maximise the benefits of HS2 in the Sheffield City Region; and 4. Stimulate growth and regeneration in Town and City Centres. 2.12 DSA is expressly identified as a growth area which is currently being developed as an engineering and aero-industry centre "alongside and including" housing growth. The IIP encourages Spatial Frameworks such as the Doncaster LP to be prepared to identify strategic areas of future housing delivery aligned with the ambitions of the Growth Areas and Urban Centres - this should include strategic opportunities for housing as an integrated element of Growth Areas. Global Innovation Corridor 2.13 DSA is working with partners in the Sheffield City Region, including the Local Enterprise Partnership, universities and advanced manufacturers, to create the Global Innovation Corridor (GIC): a destination for research, development, manufacturing, maintenance, repair and overhaul. 2.14 GIC will traverse the heart of the City Region capitalising on assets of global significance - linked by the region's multi-modal transport connectivity to drive growth through innovation-led research, advanced manufacturing and engineering. 2.15 An expanded DSA will provide the global connectivity required to benefit the businesses within the GIC and deliver further high-quality investment to the DSA site and wider GIC. Businesses such as Rolls Royce require specialist facilities and a live airport for on-site training. 2.16 Focused around our R&D assets and skilled specialisms, the GIC will be a global magnet for people, industry and innovators, that will to grow our advanced manufacturing, wellbeing and digital clusters underpinned by great transport infrastructure. 2.17 The GIC will connect assets such as theAdvanced Manufacturing Innovation District, Advanced Manufacturing Research Centre, Advanced Wellbeing Research Centre, the Sheffield Olympic Legacy Park, National College for High Speed Rail, Barnsley's Digital Media Centre and Doncaster Sheffield Airport.
Summary:

Peel is passionate about growth, regeneration and prosperity in the North of England. Peel has a track record of delivering economic growth programmes in the North. It supports Northern Powerhouse objectives and the potential of the North, and has committed to this via its Peel in the Northern Powerhouse statement (2015). DSA is one of 150 projects. The government clearly recognise the role an airport can play in delivering the northern powerhouse: "The International gateway to Sheffield City Region for passengers and part of the logistics hub. Over #113m is currently being invested to improve its surface connectivity which will increase passenger numbers, and hence heighten its strategic significance and GVA benefits to the north." (One North: A Proposition for an Interconnected North (HM Government, July 2014)) The Sheffield City Region Economic Plan sets ambitious growth targets and one of seven city region areas of growth and change is DSA. It is crucial the Local Plan fully aligns with the SCR Strategic Economic Plan. To support this, the Integrated Infrastructure Plan identifies spatial priorities, including expressly DSA as a growth area for engineering and aero industry, "alongside and including" housing growth. This encourages spatial frameworks to identify strategic areas for housing aligned with the ambitions of growth areas and urban centres. DSA is working with partners in the Sheffield City Region, including the Local Enterprise Partnership, universities and advanced manufacturers, to create the Global Innovation Corridor (GIC): a destination for research, development, manufacturing, maintenance, repair and overhaul. An expanded DSA can provide the connectivity business in the GIC require and deliver high quality investment to DSA and the wider GIC. The GIC will be a global magnet for people, industry and innovators. The GIC will connect assets such as the Advanced Manufacturing Innovation District, Advanced Manufacturing Research Centre, Advanced Wellbeing Research Centre, the Sheffield Olympic Legacy Park, National College for High Speed Rail, Barnsley's Digital Media Centre and Doncaster Sheffield Airport.

Response:

Introductory type comments - specific detailed aspects of the Representation will be picked up through the subsequent parts of this summary/response document.
**Comment Ref:** C/Introduction/04418/1/001  
**Attend Examination:** Attend Hearing  
**Reason:** To allow participation in discussions regarding the sustainability appraisal, settlement strategy, proposed housing requirement and distribution of development including site selection and allocations.  
**Area:** Miscellaneous - Introductions  
**Policy:**

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<th>Tests of Soundness</th>
<th>Positively prepared</th>
<th>Effective</th>
<th>Legally Compliant</th>
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**Comment:**

1.1 This submission has been prepared by Longwall Property on behalf of Inherent Property Ltd in response to the consultation on the Publication version of the Doncaster Local Plan. 1.2 Inherent Property are working with the owners of a site on Worksop Road in Tickhill (reference 930) to promote it through the emerging Local Plan as a potential residential development site. We have previously written to the council regarding the site and provided a Development Statement identifying the site’s development potential. 1.3 These comments have also been prepared with the knowledge of the owners of the adjoining site (reference 281). Both parties have indicated a willingness to work together to ensure the wider site can be delivered.

**Summary:**

Introduction is made to comments made to various parts of the Local Plan summarised elsewhere.

**Response:**

Noted
Comment Ref:    C/Introduction Letter/04430/1/001

Comment:
Please find enclosed a representation prepared by Pegasus Group on behalf of The Gascoine Group in relation to Land of West Bawtry Hall, Bawtry. The representation considers the content within the Publication Draft of the Doncaster Local Plan. The representation should be read in conjunction with the accompanying representation produced by Pegasus Group to the draft policies and proposed site informal consultation in September 2018 and promotional document which are enclosed. (SEE EMAIL FOR other documents)

Summary:
The representation considers the content within the Publication Draft of the Doncaster Local Plan. (on behalf of The Gascoine Group in relation to Land of West Bawtry Hall, Bawtry) The representation should be read in conjunction with the accompanying information produced by Pegasus Group to the draft policies and proposed site informal consultation in September 2018 and promotional document which are enclosed.

Response:
1.1 This representation is prepared by Pegasus Group on behalf of The Gascoine Group in relation to Land of West Bawtry Hall, Bawtry. The representation considers the content within the Publication Draft of the Doncaster Local Plan. 1.2 In compiling this representation Pegasus Group have applied the four elements of soundness referred to in the National Planning Policy Framework, which are; positively prepared, justified, effective and consistent with national policy. 1.3 This representation should be read in conjunction with the accompanying representation produced by Pegasus Group to the draft policies and proposed site informal consultation in September 2018. That document promotes the site and illustrates why it should be allocated for residential development. The purpose of this submission is to focus on the matters within the Publication Draft only, mainly the overall requirement and distribution of housing. (SEE EMAIL FOR other documents)

Summary:

Pegasus Group have applied the four elements of soundness referred to in the National Planning Policy Framework, which are; positively prepared, justified, effective and consistent with national policy in considering the content of the Local Plan representation should be read in conjunction with the accompanying representation produced by Pegasus Group to the draft policies and proposed site informal consultation in September 2018. Focusing on publication draft, the information identifies why the site should be allocated for residential development
1.1 This statement has been prepared to respond to the Doncaster MBC Local Plan Publication Draft having regard to whether the Draft Plan is sound when considered against the four tests of soundness as set out in the National Planning Policy Framework (the "Framework"). Plans are "sound" if they are: - Positively Prepared - providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is consistent with achieving sustainable development; - Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; - Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and - Consistent with national policy - enabling the delivery of sustainable development in accordance with policies in this Framework. 1.2 Johnson Mowat make the following comments in relation to a number of Draft Policies in the Publication Draft and promote Site 1013 and land immediately adjacent, to the south of Common Lane, Auckley on behalf of The Strategic Land Group (SLG), who have an interest in the site. Appendix 1 contains a plan showing the extent of the site. 1.3 An Outline planning application for residential development (of up to 82 dwellings) which was validated by Doncaster Council on 13th September 2017 was refused on 19th July 2019 (Application Ref 17/02278/OUTM). The application was refused for three reasons, the first reason relating to the current location of the site within the Countryside Policy Area. The other two reasons for refusal relate to the access design and resultant loss of part of an existing hedgerow. It is considered that in light of the highway details submitted to the Council’s highways team in the months leading up to the refusal, that the highways reason for refusal is not insurmountable. In relation to the third reason for refusal (regarding loss of part of a hedgerow), the proposed removal of some hedging will be required to accommodate a new access point. The LVIA and the revised drawings submitted to the Council provide a comprehensive landscape design which will be an important part of the development proposals. The Landscape Framework Plan describes measures to enhance the biodiversity of the site, including the use of native planting, linking wildlife corridors, and the creation of attenuation ponds to assist in water management and create new habitats. In light of these facts it is considered that the third reason for refusal can be overcome. Appendix 2 contains the indicative site layout that formed part of the Outline application. The Outline application relates to Site 1013. 1.4 Details of additional land to the immediate north east of the site have also been put forward to the Council which relates to land outlined in blue on the plan at Appendix 1. 1.5 Johnson Mowat submitted representations to the Informal Consultation Draft Sites and Policies document in October 2018 on behalf of SLG. A number of the comments made remain relevant, given the continuation of the Council’s approach in the Publication Draft. (SEE EMAIL FOR Appendices)
We have been instructed on behalf of the Sandbeck Estate, who are landowners within the Borough, to submit a response to the Doncaster Local Plan Regulation 19 Consultation. Our client's interest is in respect of the settlements of 'Tickhill' and 'Stainton'. We previously submitted representations to the Regulation 18 Consultations promoting these sites and we reiterate some of this evidence again. Furthermore, we have prepared additional evidence in the form of a 'Comparative Landscape and Green Belt Assessment' which compares our client's site at Wong Lane to the Regulation 19 Local Plan preferred site (Sunderland Street) in terms of Green Belt purposes (See Appendix B). Our comments focus on the settlements of Tickhill and Stainton. The Sandbeck Estate is committed to working alongside Doncaster Metropolitan Borough Council to bring forward deliverable sites under its ownership. Please see Appendix A for a Location Plan of the five sites. We therefore suggest that several changes should be made to the aforementioned draft strategies and policies before the Plan could be considered sound. We also propose that "Land off Lindrick Lane, Tickhill" (HELAA Reference Site 356), "Land off Wong Lane, Tickhill" (HELAA Reference Site 357) and Land at Stud Farm, Tickhill" (No current HELAA Reference) are deleted from the Green Belt and allocated for housing development in Tickhill over the plan period. The site at Sunderland Road - the Local Plan's preferred site should be removed. We also support the future allocation of "Manor Farm" and "Land to North of Limekiln Lane" at Stainton. Our suggested changes (and associated justification) to the Local Plan policies and proposals are set out in Section 2 below. (SEE EMAIL FOR Appendices) (NOTE THIS REP IS FOR SITE 1021 AND THE OTHER COMMENTS ARE ONLY THOSE WHICH REFER TO THIS SITE, THE COMMENTS FOR THE OTHER SITES ARE INCLUDED UNDER THEIR REFNUMBER - SEE: 03568 / 03569 / 03570 / 03571)

**Summary:**

Comments made regarding Site 1021 - Land at Stud Farm, Tickhill, which are combined with comments made and summarised elsewhere.

**Response:**

Tickhill does have a shortfall of housing against its allocated target, however it has a number of constraints to the delivery of housing, including Green Belt and access issues. The site in question has a weak case in Green Belt terms for continuation in the site selection process. It is also adjacent to Tickhill Castle and within the view of St Mary's Church in the Tickhill conservation area. As such, site 1021 scores particularly strongly against the historic aims of the Green Belt.
Tests of Soundness:

Justified

Comment:

Some land within our client's ownership was assessed as part of the HELAA evidence base. Our client's sites at Tickhill and Stainton are set out below. The sites are known as: "Land off Wong Lane, Tickhill" - HELAA Site 357; "Land off Lindrick Lane, Tickhill" - HELAA Site 356; "Land at Stud Farm, Tickhill" (not assessed in the 2017 HELAA) - "Land at Manor Farm, Stainton" - HELAA Site 359 - "Land North of Limekiln Lane, Stainton" - HELAA Site 358. Sites 356, 357, 358 & 359 were all identified as Deliverable / Developable Sites in the HELAA and therefore there were no physical or technical reasons as to why the sites could not come forward for residential development (the only constraint being that the land lies within Green Belt). In conclusion, following the assessment of the sites in the Doncaster HELAA update, we consider that our clients land should be deleted from the Green Belt, where necessary and allocated as housing sites in the Local Plan. Our comments with regard to individual sites are in respect of the settlements of Tickhill and Stainton. (NOTE THIS REP IS FOR SITE 1021 AND THE OTHER COMMENTS ARE ONLY THOSE WHICH REFER TO THIS SITE, THE COMMENTS FOR THE OTHER SITES ARE INCLUDED UNDER THEIR REFNUMBER - SEE: 03568 / 03569 / 03570 / 03571)

Summary:

Comments made regarding Site 1021 - Land at Stud Farm, Tickhill, which are combined with comments made and summarised elsewhere.

Response:

Tickhill does have a shortfall of housing against its allocated target, however it has a number of constraints to the delivery of housing, including Green Belt and access issues. The site in question has a weak case in Green Belt terms for continuation in the site selection process. It is also adjacent to Tickhill Castle and within the view of St Mary's Church in the Tickhill conservation area. As such, site 1021 scores particularly strongly against the historic aims of the Green Belt.
National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document. About National Grid National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales and National Grid Electricity System Operator (NGESO) operates the electricity transmission network across the UK. The energy is then distributed to the eight electricity distribution network operators across England, Wales and Scotland. National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK’s four gas distribution networks where pressure is reduced for public use. National Grid previously owned part of the gas distribution system known as ‘National Grid Gas Distribution limited (NGGDL). Since May 2018, NGGDL is now a separate entity called ‘Cadent Gas‘. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect National Grid’s assets.

Summary:
Information about National grid and its role is provided as introductory information to their main representations.

Response:
Comment:

1.1 These representations have been prepared by Barton Willmore on behalf of Barratt and David Wilson Homes (Yorkshire East) (hereafter referred to as the 'Client'). 1.2 Our Client has a keen interest in the future development of Doncaster and is grateful for this opportunity to engage in the forward planning process. Our Client is keen to ensure that the emerging Local Plan is sound and will bring forward the Authority's housing and employment needs. Our Client is pleased to have the opportunity to positively engage with Doncaster Council (hereafter referred to as the 'Council') to help it achieve a robust Local Plan. About Barratt and David Wilson Homes 1.3 Barratt and David Wilson Homes is Britain's best-known house builder and has built over 300,000 new homes around the country, including 17,579 homes last year. Our Client is leading in the field of low carbon design, urban regeneration, social housing and innovation. 1.4 Barratt and David Wilson Homes is one of the largest residential developers in the UK, helping to meet housing demands in a range of towns, cities and rural areas. Our Client builds a variety of housing from first-time buyers apartments to family houses, plus many for social rent and shared ownership. 1.5 Our Client currently has interests in the following sites within Bawtry: - 141 - Westwood Road, Bawtry (allocated for housing); - 146 - Tickhill Road, Bawtry (promoted for housing allocation, but dismissed).

Summary:

Comments noted. see following sections for detail

Response:

Responses to Representations in respect to SA are set out in the Wood Environment & Infrastructure SA Report Addendum
1.1 These representations have been prepared by Barton Willmore on behalf of Barratt and David Wilson Homes (Yorkshire East) (hereafter referred to as the ‘Client’). 1.2 Our Client has a keen interest in the future development of Doncaster and is grateful for this opportunity to engage in the forward planning process. Our Client is keen to ensure that the emerging Local Plan is sound and will bring forward the Authority's housing and employment needs. Our Client is pleased to have the opportunity to positively engage with Doncaster Council (hereafter referred to as the ‘Council’) to help it achieve a robust Local Plan. About Barratt and David Wilson Homes 1.3 Barratt and David Wilson Homes is Britain’s best-known house builder and has built over 300,000 new homes around the country, including 17,579 homes last year. Our Client is leading in the field of low carbon design, urban regeneration, social housing and innovation. 1.4 Barratt and David Wilson Homes is one of the largest residential developers in the UK, helping to meet housing demands in a range of towns, cities and rural areas. Our Client builds a variety of housing from first-time buyers apartments to family houses, plus many for social rent and shared ownership. 1.5 Our Client currently has interests in the following sites within Bawtry: - 141 - Westwood Road, Bawtry (allocated for housing); - 146 - Tickhill Road, Bawtry (promoted for housing allocation, but dismissed).
The landowner has sought to work collaboratively with Doncaster Metropolitan Borough Council (DMBC) over recent years to explore the development options on the land at Nutwell South, Nutwell Lane, Armthorpe. In doing so, the landowner has submitted several site submissions and written representations to support the development of Site 149 as part of the emerging Local Plan process. Such submissions have included evidence which strongly supports the proposed allocation. The landowner has also sought to meet with DMBC at every opportunity to discuss the site in more detail in addition to at tempting to work with the Neighbourhood Plan Steering Group in order to promote the site for development as part of this process. Unfortunately the Site was not progressed as part of the Neighbourhood Plan which has since been adopted. Irrespective of the evidence base to support an allocation at the Site, the Site has not been allocated for development as part of the emerging Local Plan either. It is strongly advisable that Site 149 should be re-considered now for a mixed-use development comprising both residential and employment uses, within which, the proposed development would include the opportunity for a bypass road to facilitate traffic management within the village. The draft indicative masterplan previously submitted is appended for reference. This masterplan demonstrates how the site could be developed and emphasises that development on the site is entirely feasible and will assist the Council in meeting its housing and employment land targets. Pre-application meetings with various departments from across the Council were undertaken in the summer of 2017 including attendance from Assistant Director of Development, Head of Planning, Investment and Tourism Team Manager, Investment and Tourism Team Manager, Highways, and Economic Development. A copy of the Pre-Application Document is again appended for reference. The pre-application submission focussed on the delivery of small and medium enterprises (SME's) at the site however, it’s considered that there is also potential for a mixed-use development across the wider site to provide both residential and employment uses. A further pre-application meeting was held with the Council in December 2018 following submission of the representations submitted in October 2018. The meeting was requested by the landowner following a change in circumstances and the material start on the adjacent employment site at West Moor Park. The purpose of the meeting was the discuss the principle of a mixed use development on the site and the need to review the site selection methodology and site assessments in this respect, to ensure a consistent approach from the Council across the Borough. The Council welcomed the opportunity to discuss the site and the site selection methodology in more detail in this respect. The Council advised that the site selection methodology would be reviewed in advance of the next round of Consultation which was welcomed by all however, from a review of the evidence base to support the emerging Local Plan this has not been implemented in advance of this Local Plan Consultation which is grossly disappointing. As outlined above, since the aforementioned meeting with DMBC in December 2018, phase one of the site adjacent to the north (West Moor Park Extension) is now complete. The adjacent development includes a road which leads directly to the northern site boundary and effectively 'opens up' and unlocks the site at Nutwell Lane for development. Site 149 is therefore now entirely available and there are no known technical constraints to the site being brought forward for development in the short-medium term. The provision of a road up to the site boundary of Site 149 also presents an opportunity for the development of the site to provide a much needed bypass for Armthorpe and the local area. This is a rare opportunity to improve the local transport network which should not be ignored by DMBC.

Summary:
The landowner has sought to work collaboratively with the Council over the years to explore development options for land at Nutwell South. Several representations have been submitted to support the development of site 149. The site was not progressed as part of the Neighbourhood Plan or as part of the emerging Local Plan. Site 149 should be re-considered for a mixed-use development (housing and employment) which would include a bypass road to help with traffic management. The draft indicative masterplan is submitted as an appendix. Development on the site is entirely feasible and will help meet housing and employment land targets. Pre-application meetings have been held (2017) and a copy of the document is included as an appendix. It focused on the delivery of small and medium enterprises, but there is also the potential for a mixed use development for both residential and employment. A further meeting took place in October 2018 with the Council in which the landowner wanted to discuss the principle of development and the need to review the site selection methodology and site assessments. The Council advised that the site selection methodology would be reviewed in advance of the next consultation. However a review of the Local Plan evidence base has not been implemented. This is grossly disappointing. Phase 1 of West Moor Park Extension (to the north of site 149) is now complete and includes a road which 'opens up' and unlocks site 149. This means that site 149 is entirely available and there are no known technical constraints to bringing the site forward. There is an opportunity to provide an Armthorpe bypass.

Response:
Comment:
These representations have been prepared by Savills (UK) Ltd on behalf Mr Philip Lodge (the landowner) in respect of his landholding at Nutwell Lane, Armthorpe, in response to Doncaster Metropolitan Borough Council’s (DMBC) Local Plan Publication Consultation. Our client’s land is identified in the plan’s evidence base as Site 149 Nutwell South. These representations focus on the soundness of the Draft Plan. As such these representations focus on the Soundness and Legal Tests contained within Paragraph 35 of the NPPF which states plans must be: a. Positively prepared - providing a strategy which, as a minimum, seeks to meet the area’s housing and employment needs; and is informed by agreement with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; b. Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; c. Effective - deliverable over the plan period, and based on effective joint working on cross - boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and d. Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in this Framework. These representations build upon previous comments made at the Informal Consultation in October 2018 and the follow on meeting with the Council in December 2018. A copy of the previous representation is appended for completeness. Savills remain significantly concerned with the Council's methodology and site selection process. As such, Savills remain concerned with the Council’s ability to allocate and deliver sufficient deliverable sites for both housing and employment uses across the Borough over the Plan period. Site 149 is considered to be a highly sustainable and deliverable site for an employment led, mixed use development and the justification for discounting the site is significantly unfounded without due appropriate evidence.

Summary:
This representation builds upon previous comments made to the Informal Consultation stage in October 2018 and with a meeting with the Council in December 2018. Savills remain significantly concerned with the Methodology and Site Selection Process. There is a concern with the Council's ability to allocate and deliver sufficient deliverable housing and employment sites over the plan period. Site 149 is highly sustainable and deliverable site for employment led, mixed use development. The justification for discounting the site is significantly unfounded without due appropriate evidence.

Response:
Noted
UKOOG is the representative body for the UK onshore oil and gas industry, including exploration and production. We support the process of local plan making and want to ensure that any proposed plan with respect to onshore oil and gas is sound and meets with the criteria and policies outlined by Government in the NPPF, Planning Practice Guidance and related Written Ministerial Statements. In our view, minerals plans should establish clear criteria-based policies against which proposals can be transparently assessed on a case by case basis. This letter should be read in conjunction with our previous response to the 'Informal Consultation: Draft Policies and Proposed Sites', which closed on 26th October 2018. Our response to this earlier consultation is appended in annex 1. The planning process for onshore oil and gas is one of five regulatory processes that are required under the current policy framework set by government. As such the proposed plan should include a review of each regulatory function and identify those areas which fall outside of the planning process. PPG 012 and PPG 112 make clear that planning authorities are not responsible for matters covered by other regulatory regimes. MPAs “should assume that these regimes will operate effectively. Whilst these issues may be put before mineral planning authorities, they should not need to carry out their own assessment as they can rely on the assessment of other regulatory bodies.” This planning policy principle has been re-confirmed in a number of legal cases including most recently. (Frack Free Balcombe Residents Association) v West Sussex CC 2014.

Summary:
supports the process of local plan making. The representation clarifies the planning authority as one of five regulatory regimes and PPG 012 and PPG 112 make clear that planning authorities are not responsible for matters covered by other regulatory regimes.

Response:
Comments noted
Felsham Planning and Development is instructed to submit a representation to the Local Plan consultation on behalf of INEOS Upstream Ltd. This representation deals with Policy 65 covering unconventional gas and associated development management policies, in particular Policy 55 Pollution and Policy 64 Reclamation of Minerals Sites (Restoration, Aftercare and After-Use). We have previously expressed concerns about the wording of policy 65, which did not reflect the positive approach to unconventional gas required by the Written Ministerial Statement (WMS) of 17th May 2018 and revised NPPF 2018. The subsequent WMS of 23rd May 2019 reiterated the approach to policy making that the Government requires. We are pleased to note the revisions made to policy 65 to provide a simple policy that makes a positive statement in support and removes all the very restrictive text in the draft. However, it leaves any hydrocarbon application to be judged against the other policies of the plan, which could easily be used to block any applications. In addition it fails to follow the Government’s explicit direction to provide policy guidance for each phase of the process namely exploration, appraisal and production. Whilst the policy has been revised to provide the positive statement we sought there is a need for a simple set of criteria which set out the principles against which any application will be assessed. Without that the current draft policy is unsound because it is simply a statement and provides no guidance about specific points to address. Therefore, INEOS is supportive of the positive policy approach but believe that some amendments are necessary. At the outset it is important to note: - The planning process for onshore oil and gas is one of five regulatory processes that are required under the current policy framework set by government. As such the proposed plan should include a review of each regulatory function and identify those areas which fall outside of the planning process. PPG 012 and PPG 112 make clear that planning authorities are not responsible for matters covered by other regulatory regimes. Minerals planning authorities should assume that these regimes will operate effectively. Whilst these issues may be put before mineral planning authorities, they should not need to carry out their own assessment as they can rely on the assessment of other regulatory bodies. This planning policy principle has been re-confirmed in a number of legal cases including most recently, (Frack Free Balcombe Residents Association) v West Sussex CC 2014. - Unconventional gas is a national resource for the benefit of all. National policy recognises that minerals development has certain characteristics, such as temporary use over a long period of time and adverse impacts which may require mitigation (PPG 001); that impacts will vary from site to site (PPG 013); are best assessed through the EIA process but that does not mean that an EIA is necessarily required (PPG 011); and impacts are best controlled through the imposition of appropriate work programmes (PPG 015). Assessments and decisions should be made, and mitigation applied, on a case-by-case basis as envisaged by national policy. PPG 018 refers to the need for any proposed separation distance [to] be established on a site specific basis and should be effective, properly justified and reasonable. - The point of appraisal is to understand the potential in any given area. At the point of making an application for an appraisal well it will not be possible to supply a completed appraisal of the hydrocarbon resource field because the purpose of the appraisal well is to help to gather such information. - National policy does not require that production is undertaken within a specific timescale.

**Summary:**

Introduction The representation deals with Policies 55, 64 and 65. pleased to note the revisions made to policy 65 to provide a simple policy that makes a positive statement in support and removes all the very restrictive text. There is a need for a simple set of criteria which set out the principles against which any application will be assessed INEOS is supportive of the positive policy approach but amendments are required.

Response:

Comments noted. the introduction identifies policy responses to policies 55, 64 and 65 in relation to Written Ministerial Statements. See policy responses to policies 55, 64 and 65 for detailed response.
Comment:
Cuadrilla Resources Limited (Cuadrilla) welcomes the opportunity to participate in the 2019 consultation of the Doncaster Local Plan 2015 - 2035 (Publication Version). We support the process of local plan drafting and consultation and wish to ensure that this is undertaken with due consideration to the onshore oil and gas industry, in particular ensuring consistency with policies set out in the National Planning Policy Framework (NPPF), associated Planning Practice Guidance (PPG) and related Written Ministerial Statements. This letter should be read in conjunction with our previous response (dated 26th October 2018) to the informal consultation of the Doncaster Local Plan (Draft Policies and Proposed Sites) September 2018. Cuadrilla is a member of United Kingdom Onshore Oil and Gas (UKOOG), the representative body for the UK onshore oil and gas industry, including exploration and production. Cuadrilla is aware that UKOOG has made a submission to Doncaster Council in relation to this consultation; Cuadrilla supports the representations made by UKOOG in that submission. Cuadrilla's own submission is set out below. We focus our submission on the content of Policy 65 (Providing for Energy Minerals (Onshore Gas and Oil (Hydrocarbons)).

Summary:
Support the process of local plan drafting and consultation and wish to ensure that this is undertaken with due consideration to the onshore oil and gas industry, in particular ensuring consistency with policies set out in the National Planning Policy Framework (NPPF), associated Planning Practice Guidance (PPG) and related Written Ministerial Statements.

Response:
Comments noted.
IGas supports the views of UKOOG, the representative body for the UK onshore oil and gas industry, including exploration and production. IGas makes the following comments in respect of the vision and objectives of the plan and those policies considered relevant to the hydrocarbon industry.

**Comment:**

IGas supports the views of UKOOG, the representative body for the UK onshore oil and gas industry, including exploration and production. IGas makes the following comments in respect of the vision and objectives of the plan and those policies considered relevant to the hydrocarbon industry.

**Summary:**

IGas supports the views of UKOOG, the representative body for the UK onshore oil and gas industry, including exploration and production. IGas makes the following comments in respect of the vision and objectives of the plan and those policies considered relevant to the hydrocarbon industry.

**Response:**

comment noted
Comment:

1.1. Spawforths have been instructed by EON to submit representations to the Doncaster Local Plan 2015-2035 Publication Version. 1.2. EON welcomes the opportunity to contribute to the Doncaster Local Plan and are keen to further the role of Doncaster Council within the Sheffield/Leeds City Region, and Yorkshire and Humber as a whole. 1.3. As you are aware, EON has significant land interests in the area and has made representations to earlier stages of the emerging Local Plan. EON operate Tween Bridge, which comprises 22 turbines and has a total power output of 44MV. In 2015, the wind farm met around 30,000 homes annual electricity needs. 1.4. The Tween Bridge Wind Farm provides a community fund towards worthwhile local projects and initiatives. This fund will provide approximately £1.25 million over the life of the wind farm for the benefit of local people. Tween bridge also contributes around £400k in business rates to Doncaster MBC. 1.5. Significantly, Tween Bridge was determined to be an appropriate location for wind energy development following the scrutiny of a public inquiry. Notwithstanding the requirement to ensure appropriate environmental safeguards, particularly in respect of nature conservation interests on the adjoining Thorne Moors and to ensure the safe operation of Doncaster Sheffield Airport, the scheme was deemed to be acceptable subject to conditional control. 1.6. Although Tween Bridge, like all other onshore wind energy schemes has been approved for a temporary period, the operational turbines at the wind farm form an integral component of the landscape. 1.7. Given the availability of additional grid network capacity at Tween Bridge and informed by initial baseline assessment work and consultation, EON has commenced work on a feasibility study to explore the scope to deliver up to four further wind turbines on the site. There are a number of potential options that could be pursued to achieve this objective. In this context it would seem sensible to keep the potential option open to develop further wind turbines at Tween Bridge. 1.8. Having reviewed the Local Plan 2015-2035 Publication Version and the published evidence base documents it is clear that Policy 60 of the Local Plan and the Background Policy Document on Wind Energy Development seek to confirm an Area of Search for wind energy development that would not include the existing wind energy developments within the Borough such as Tween Bridge. Instead, the proposed Area of Search would encompass land to the west of the Borough and to the south east of Barnby Dun - a location that does not, at least as of yet, accommodate any wind energy development. 1.9. The Background Policy Document has been principally driven by outdated landscape assessment work that was undertaken before Tween Bridge and other wind energy developments within the Borough became operational. Hence the document fails to acknowledge that existing turbines, including the 22 turbines at Tween Bridge, form an integral part of the landscape. Wind energy operators do not appear to have been consulted on the Background Policy Document and EON only became aware of the document through the Doncaster Local Plan Informal Consultation: Draft Policies and Proposed Sites, September 2018. 1.10. EON would like to make comments on the following policy in the Doncaster Local Plan 2015-2035 Publication Version: - Policy 60 Wind Energy Development and associated Background Policy Document on Wind Energy Development and Landscape Character Study. 1.11. Observations are set out below with reference to the provisions of the Framework and amendments are suggested to ensure that the Local Plan is made sound. 1.12. EON welcome the opportunity for further engagement and the opportunity to appear at the Examination in Public. 1.13. We trust that you will confirm that these representations are duly made and will give due consideration to these comments. 1.14. Please do not hesitate to contact us to discuss any issues raised in this Representation further.

Summary:

Comments noted.

Response:
Comment Ref: C/Introduction Letter/05172/1/001

Attend Examination: Attend Hearing

Reason: To provide a full explanation of our points and address issues raised by the Council, Inspector or other participants.

Area: Miscellaneous - Introductions

Policy:

Tests of Soundness:

Comment:

Please find enclosed a representation prepared by Pegasus Group on behalf of Mr. J. Wilson in relation to Land at Martin Lane Bawtry. The representation considers the content within the Publication Draft of the Doncaster Local Plan. The representation should be read in conjunction with the representation produced by Pegasus Group to the draft policies and proposed site informal consultation in September 2018, which is enclosed (appendix 2). This representation is accompanied by a revised Concept Masterplan (appendix 1). In addition appendix 2 also includes the Initial Appraisal of Key Landscape & Visual Issues and Housing Need Evidence Appraisal. (SEE EMAIL FOR Appendices)

Summary:

Representation by Pegasus Group on behalf of Mr. J. Wilson in relation to Land at Martin Lane Bawtry

Response:
Comment:
Please find enclosed a representation prepared by Pegasus Group on behalf of Metacre Limited in relation to Land at Crabgate Lane, Carcroft & Skellow. The representation considers the content within the Publication Draft of the Doncaster Local Plan. The representation should be read in conjunction with the accompanying representation produced by Pegasus Group to the draft policies and proposed site informal consultation in September 2018, which is enclosed.

Summary:
Promoting site at Crabgate, Skellow

Response:
1.1 This representation is prepared by Pegasus Group on behalf of Metacre Limited in relation to Land at Crabgate Lane, Carcroft & Skellow. The representation considers the content within the Publication Draft of the Doncaster Local Plan. 1.2 In compiling this representation Pegasus Group have applied the four elements of soundness referred to in the National Planning Policy Framework, which are; positively prepared, justified, effective and consistent with national policy. 1.3 This representation should be read in conjunction with the accompanying representation produced by Pegasus Group to the draft policies and proposed site informal consultation in September 2018. That document promotes the site and illustrates why it should be allocated for residential development. The purpose of this submission is to focus on the matters within the Publication Draft only, mainly the overall requirement and distribution of housing.

Summary:
Pegasus have compiled the representation considering the tests of soundness referred to in the National Planning Policy Framework, which are; positively prepared, justified, effective and consistent with national policy.

Response:
Comment:
Please find enclosed a representation prepared by Pegasus Group on behalf of Metacre Limited in relation to Land at Mill Lane, Carcroft & Skellow. The representation considers the content within the Publication Draft of the Doncaster Local Plan. The representation should be read in conjunction with the accompanying representation produced by Pegasus Group to the draft policies and proposed site informal consultation in September 2018, which is enclosed.

Summary:
Representing site 185 - Mill Lane, Carcroft.

Response:
1.1 This representation is prepared by Pegasus Group on behalf of Metacre Limited in relation to Land at Mill Lane, Carcroft & Skellow. The representation considers the content within the Publication Draft of the Doncaster Local Plan. 1.2 In compiling this representation Pegasus Group have applied the four elements of soundness referred to in the National Planning Policy Framework, which are; positively prepared, justified, effective and consistent with national policy. 1.3 This representation should be read in conjunction with the accompanying representation produced by Pegasus Group to the draft policies and proposed site informal consultation in September 2018. That document promotes the site and illustrates why it should be allocated for residential development. The purpose of this submission is to focus on the matters within the Publication Draft only, mainly the overall requirement and distribution of housing.

Summary:
The representation will consider the four tests of soundness - positively prepared, justified, effective and consistent with national policy.

Response:
Framecourt Homes welcomes the opportunity for further engagement and the opportunity to appear at the Examination in Public.

Reason: Test of Soundness:
- Positively prepared
- Effective
- Justified
- Consistent with national

Comment:
3.1. Framecourt Homes is concerned that the Doncaster Local Plan - Publication Plan is deficient in its content and the evidence base does not reflect national guidance. Test of Soundness 3.2. Framecourt Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X Positively Prepared X Effective X Justified X Consistency with National Policy

3.3. Framecourt Homes is concerned that the draft Local Plan does not reflect the Framework (2019). Framecourt Homes is concerned that the housing requirement does not reflect economic growth ambitions, the level of employment allocations, nor is it sufficient to meet the identified needs for affordable housing. Further Framecourt Homes are concerned that there are insufficient housing allocations to meet the housing requirement. 3.4. Framecourt Homes is concerned that there is a lack of up to date, available, and robust evidence base to accompany the Plan, particularly in respect of an up to date Housing Needs Assessment, whilst a 2019 update is referred to in the Plan, it is not yet publicly available, the Viability Evidence (May 2019), which requires further testing to support its conclusion, and specific evidence to justify key policies 3.5. Framecourt Homes consider that the Policies in the Local Plan are not justified and does not provide an appropriate strategy. The Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 3.6. In these circumstances, Framecourt Homes do not consider the Doncaster Local Plan, in its current form, to be sound.

3.7. However, Framecourt Homes consider that the plan can be made sound subject to proposed changes as set out within the following sections of these representations. Framecourt Homes will continue to work with the Council to develop appropriate modifications to the Local Plan.

Proposed Change 3.8. To overcome the objection and address soundness matters, the Council should: - Identify a higher housing requirement to meet economic and affordable housing ambitions and needs. - Identify sufficient supply of housing to meet the identified housing requirement. - Review and make available supporting evidence for the Plan as indicated in these representations. - Review and provide additional testing in the Whole Plan Viability Report; and - Respond to the evidence and provide increased flexibility in the Plan, refer to specific proposed changes under each policy.

Summary:
The Local Plan is unsound. It does not reflect the framework (2019) and also does not reflect the economic growth ambitions, level of employment allocations and is insufficient to meet identified affordable housing needs. There are also insufficient housing allocations. There is a lack of up to date and robust evidence to accompany the plan, especially an up to date housing needs assessment. The 2019 version is unavailable at this stage. It does not provide an appropriate strategy and could fail to deliver sustainable development in accordance with the policies in the framework, and is inconsistent with national policy. Changes can be made to make this sound: - Identify a higher housing requirement to meet economic and affordable housing ambitions and needs. - Identify sufficient supply of housing to meet the identified housing requirement. - Review and make available supporting evidence for the Plan as indicated in these representations. - Review and provide additional testing in the Whole Plan Viability Report; and - Respond to the evidence and provide increased flexibility in the Plan, refer to specific proposed changes under each policy.

Response:
1.1. Spawforths have been instructed by Framecourt Homes Ltd to submit representations to the Doncaster Local Plan 2015-2035: Publication Version, for their site at Apy Hill Lane, Tickhill. 1.2. Appended to these representations is a report assessing the housing requirement, prepared by Regeneris Consulting. (SEE EMAIL FOR Regeneris Report) 1.3. Framecourt Homes welcomes the opportunity to contribute to the emerging Local Plan for Doncaster and is keen to further the role of Doncaster within the Sheffield City Region, South Yorkshire and the Yorkshire and Humber Region as a whole. 1.4. Framecourt Homes has significant land interests in the area, which can positively contribute towards the economic and housing growth agenda. 1.5. Framecourt Homes would like to make comments on the following topics and sections in the Doncaster Local Plan 2015-2035 Publication Version: - General Comments - Policy 2 - Spatial strategy and settlement hierarchy - Policy 3 - Level and distribution of growth - Policy 6 - Housing Allocations - Site 1019: Apy Hill Lane, Tickhill - Policy 8 - Delivering the necessary range of housing - Policy 19 - Development affecting public rights of way - Policy 20 - Access, design and layout of public rights of way - Policy 29 - Open space provision in new developments - Policy 46 - Housing design standards - Policy 66 - Developer contributions - Policy 67 - Development viability 1.6. In each case, observations are set out with reference to the provisions of the Framework and where necessary, amendments are suggested to ensure that the Local Plan is found sound. 1.7. Framecourt Homes welcomes the opportunity for further engagement and the opportunity to appear at the Examination in Public. 1.8. We trust that you will confirm that these representations are duly made and will give due consideration to these comments. 1.9. Please do not hesitate to contact us to discuss any issues raised in this Representation further.
Comment Ref: C/Introduction/05177/1/002

Attend Examination: Attend Hearing

Reason: The iPort is a logistics and warehousing site of regional and national importance, therefore it is appropriate that a representative is able take part in the hearing sessions.

Area: Miscellaneous - Introductions

Policy: Tests of Soundness: Justified Effective Consistent with national

Comment:

1.1 RPS have written this note on behalf of our client Troy Verdion, who is developing the iPort. Doncaster council’s website states; iPort is a Strategic Rail Freight Interchange (SRFI) which is delivering more than six million sq. ft (562,000 sq. m) of Grade A logistics warehousing linked with a high specification rail freight intermodal container facility. This will provide rail freight services to all major UK ports and the Channel Tunnel. 1.2 In recent months transport company Maritime Group and print specialist Kingsbury Press have agreed separate deals to take space at iPort, however there still remains availability on the site for logistics and warehousing. 1.3 Verdion strongly supports the local plan Objective of encouraging and supporting a competitive, diverse and stable economy (para 3.5.1) and will continue to work with DMBC in order to achieve it.

We welcome the recognition given so far to the role of iPort at draft paragraph 7.18. However, it is considered that there is a significant risk that this objective will not be achieved because of some aspects of the Local Plan that are unsound, namely employment allocations and Green Belt boundaries.

Summary:

Strongly support the Local Plan objective of encouraging and supporting a competitive, diverse and stable economy (para 3.5.1). Welcome the recognition of the role of iPort (para 7.18). There is a significant risk that this will not be achieved because some aspects of the Local Plan are unsound ? employment allocations and Green belt boundaries.

Response:

Comments noted
3.1. Avant Homes is concerned that the Doncaster Local Plan - Publication Plan is deficient in its content and the evidence base does not reflect national guidance. Test of Soundness

3.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound.

Which test of soundness are comments about? X Positively Prepared X Effective X Justified X Consistency with National Policy

3.3. Avant Homes is concerned that the draft Local Plan does not reflect the Framework (2019). Avant Homes is concerned that the housing requirement does not reflect economic growth ambitions, the level of employment allocations, nor is it sufficient to meet the identified needs for affordable housing. Further Avant Homes are concerned that there are insufficient housing allocations to meet the housing requirement. 3.4. Avant Homes is concerned that there is a lack of up to date, available, and robust evidence base to accompany the Plan, particularly in respect of an up to date Housing Needs Assessment, whilst a 2019 update is referred to in the Plan, it is not yet publicly available, the Viability Evidence (May 2019), which requires further testing to support its conclusion, and specific evidence to justify key policies. 3.5. Avant Homes consider that the Policies in the Local Plan are not justified and does not provide an appropriate strategy. The Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 3.6. In these circumstances, Avant Homes do not consider the Doncaster Local Plan, in its current form, to be sound. 3.7. However, Avant Homes consider that the plan can be made sound subject to proposed changes as set out within the following sections of these representations. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change

3.8. To overcome the objection and address soundness matters, the Council should: - Identify a higher housing requirement to meet economic and affordable housing ambitions and needs. - Identify sufficient supply of housing to meet the identified housing requirement. - Review and make available supporting evidence for the Plan as indicated in these representations. - Review and provide additional testing in the Whole Plan Viability Report; and - Respond to the evidence and provide increased flexibility in the Plan, refer to specific proposed changes under each policy.

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<tr>
<th>Tests of Soundness</th>
<th>Positively prepared</th>
<th>Effective</th>
<th>Justified</th>
<th>Consistent with national</th>
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**Summary:**

Concerned the plan does not reflect national guidance and considers the plan to be unsound. The housing requirement does not reflect economic growth ambitions or the level of employment allocations, nor is it sufficient to meet the identified needs for affordable housing. There are insufficient allocations to meet the housing requirement. There is a lack of up to date, available and robust evidence to accompany the plan. The housing needs assessment especially is out of date with the 2019 update referred to in the plan not publicly available. The Viability assessment requires further testing to support its conclusion and specific evidence to justify key policies. The policies in the plan are not justified and it does not provide an appropriate strategy. It could fail to deliver sustainable development in accordance with the NPPF, which it is not consistent with. It is not currently sound, but can be made so if the Council: - Identify a higher housing requirement to meet economic and affordable housing ambitions and needs. - Identify sufficient supply of housing to meet the identified housing requirement. - Review and make available supporting evidence for the Plan as indicated in these representations. - Review and provide additional testing in the Whole Plan Viability Report; and - Respond to the evidence and provide increased flexibility in the Plan, refer to specific proposed changes under each policy.

**Response:**
1.1. Spawforths have been instructed by Avant Homes to submit representations to the Doncaster Local Plan 2015-2035 Publication Version and for their site at Scawthorpe, Newton and Wadworth. 1.2. Appended to these representations is a report assessing the housing requirement, prepared by Regeneris Consulting. (SEE EMAIL FOR Appendices) 1.3. Avant Homes welcomes the opportunity to contribute to the emerging Local Plan for Doncaster and is keen to further the role of Doncaster within the Sheffield City Region, South Yorkshire and the Yorkshire and Humber Region as a whole. 1.4. Avant Homes has significant and deliverable land interests in the area, which can positively contribute towards the economic and housing growth agenda. 1.5. Avant Homes would like to make comments on the following policies in the Doncaster Local Plan 2015-2035 Publication Version: - General Comments - Policy 2 - Spatial strategy and settlement hierarchy - Policy 3 - Level and distribution of growth - Policy 6 - Housing Allocations - Rejected and New Sites: - Site 494: Green Lane, Scawthorpe - Site 1036: Melton Road, Newton - HELAA Site (871): Wadworth Hill, Wadworth - Policy 8 - Delivering the necessary range of housing - Policy 19 - Development affecting public rights of way - Policy 20 - Access, design and layout of public rights of way - Policy 29 - Open space provision in new developments - Policy 39 - Historic Parks and Gardens - Policy 46 - Housing design standards - Policy 66 - Developer contributions - Policy 67 - Development viability. 1.6. In each case, observations are set out with reference to the provisions of the Framework and where necessary, amendments are suggested to ensure that the Local Plan is found sound. 1.7. Avant Homes welcomes the opportunity for further engagement and the opportunity to appear at the Examination in Public. 1.8. We trust that you will confirm that these representations are duly made and will give due consideration to these comments. 1.9. Please do not hesitate to contact us to discuss any issues raised in this Representation further.

Summary:
Avant homes have numerous deliverable sites they are promoting and provide comments to ensure the plan is found sound.

Response:
<table>
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### Comment:

3.1. Avant Homes is concerned that the Doncaster Local Plan - Publication Plan is deficient in its content and the evidence base does not reflect national guidance. Test of Soundness 3.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 3.3. Avant Homes is concerned that the draft Local Plan does not reflect the Framework (2019). Avant Homes is concerned that the housing requirement does not reflect economic growth ambitions, the level of employment allocations, nor is it sufficient to meet the identified needs for affordable housing. Further Avant Homes are concerned that there are insufficient housing allocations to meet the housing requirement. 3.4. Avant Homes is concerned that there is a lack of up to date, available, and robust evidence base to accompany the Plan, particularly in respect of an up to date Housing Needs Assessment, whilst a 2019 update is referred to in the Plan, it is not yet publically available, the Viability Evidence (May 2019), which requires further testing to support its conclusion, and specific evidence to justify key policies. 3.5. Avant Homes consider that the Policies in the Local Plan are not justified and does not provide an appropriate strategy. The Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 3.6. In these circumstances, Avant Homes do not consider the Doncaster Local Plan, in its current form, to be sound. 3.7. However, Avant Homes consider that the plan can be made sound subject to proposed changes as set out within the following sections of these representations. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 3.8. To overcome the objection and address soundness matters, the Council should: - Identify a higher housing requirement to meet economic and affordable housing ambitions and needs. - Identify sufficient supply of housing to meet the identified housing requirement. - Review and make available supporting evidence for the Plan as indicated in these representations. - Review and provide additional testing in the Whole Plan Viability Report; and - Respond to the evidence and provide increased flexibility in the Plan, refer to specific proposed changes under each policy.

### Summary:

Concerned the plan does not reflect national guidance and considers the plan to be unsound. The housing requirement does not reflect economic growth ambitions or the level of employment allocations, nor is it sufficient to meet the identified needs for affordable housing. There are insufficient allocations to meet the housing requirement. There is a lack of up to date, available and robust evidence to accompany the plan. The housing needs assessment especially is out of date with the 2019 update referred to in the plan not publicly available. The Viability assessment requires further testing to support its conclusion and specific evidence to justify key policies. The policies in the plan are not justified and it does not provide an appropriate strategy. It could fail to deliver sustainable development in accordance with the NPPF, which it is not consistent with. It is not currently sound, but can be made so if the Council: - Identify a higher housing requirement to meet economic and affordable housing ambitions and needs. - Identify sufficient supply of housing to meet the identified housing requirement. - Review and make available supporting evidence for the Plan as indicated in these representations. - Review and provide additional testing in the Whole Plan Viability Report; and - Respond to the evidence and provide increased flexibility in the Plan, refer to specific proposed changes under each policy.

### Response:

Attend Examination: Attend Hearing
Tests of Soundness:

Comment:

1.1. Spawforths have been instructed by Avant Homes to submit representations to the Doncaster Local Plan 2015-2035 Publication Version and for their site at Scawthorpe, Newton and Wadworth. 1.2. Appended to these representations is a report assessing the housing requirement, prepared by Regeneris Consulting. (SEE EMAIL FOR Appendices) 1.3. Avant Homes welcomes the opportunity to contribute to the emerging Local Plan for Doncaster and is keen to further the role of Doncaster within the Sheffield City Region, South Yorkshire and the Yorkshire and Humber Region as a whole. 1.4. Avant Homes has significant and deliverable land interests in the area, which can positively contribute towards the economic and housing growth agenda. 1.5. Avant Homes would like to make comments on the following policies in the Doncaster Local Plan 2015-2035 Publication Version: - General Comments - Policy 2 - Spatial strategy and settlement hierarchy - Policy 3 - Level and distribution of growth - Policy 6 - Housing Allocations - Rejected and New Sites: o Site 494: Green Lane, Scawthorpe - Site 1036: Melton Road, Newton - HELAA Site (871): Wadworth Hill, Wadworth - Policy 8 - Delivering the necessary range of housing - Policy 19 - Development affecting public rights of way - Policy 20 - Access, design and layout of public rights of way - Policy 29 - Open space provision in new developments - Policy 39 - Historic Parks and Gardens - Policy 46 - Housing design standards - Policy 66 - Developer contributions - Policy 67 - Development viability 1.6. In each case, observations are set out with reference to the provisions of the Framework and where necessary, amendments are suggested to ensure that the Local Plan is found sound. 1.7. Avant Homes welcomes the opportunity for further engagement and the opportunity to appear at the Examination in Public. 1.8. We trust that you will confirm that these representations are duly made and will give due consideration to these comments. 1.9. Please do not hesitate to contact us to discuss any issues raised in this Representation further.

Summary:
Avant homes have numerous deliverable sites they are promoting and provide comments to ensure the plan is found sound.

Response:
Concerned the plan does not reflect national guidance and considers the plan to be unsound. The housing requirement does not reflect economic growth ambitions, nor is it sufficient to meet the identified needs for affordable housing. There are insufficient allocations to meet the housing requirement. There is a lack of up to date, available, and robust evidence to accompany the Plan, particularly in respect of an up to date Housing Needs Assessment, whilst a 2019 update is referred to in the Plan, it is not yet publically available, the Viability Evidence (May 2019), which requires further testing to support its conclusion, and specific evidence to justify key policies. In these circumstances, Avant Homes do not consider the Doncaster Local Plan, in its current form, to be sound. However, Avant Homes consider that the plan can be made sound subject to proposed changes as set out within the following sections of these representations. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 3.8. To overcome the objection and address soundness matters, the Council should: - Identify a higher housing requirement to meet economic and affordable housing ambitions and needs. - Identify sufficient supply of housing to meet the identified housing requirement. - Review and make available supporting evidence for the Plan as indicated in these representations. - Review and provide additional testing in the Whole Plan Viability Report; and - Respond to the evidence and provide increased flexibility in the Plan, refer to specific proposed changes under each policy.
Tests of Soundness:

Comment:

1.1. Spawforths have been instructed by Avant Homes to submit representations to the Doncaster Local Plan 2015-2035 Publication Version and for their site at Scawthorpe, Newton and Wadworth. 1.2. Appended to these representations is a report assessing the housing requirement, prepared by Regeneris Consulting. (SEE EMAIL FOR Appendices) 1.3. Avant Homes welcomes the opportunity to contribute to the emerging Local Plan for Doncaster and is keen to further the role of Doncaster within the Sheffield City Region, South Yorkshire and the Yorkshire and Humber Region as a whole. 1.4. Avant Homes has significant and deliverable land interests in the area, which can positively contribute towards the economic and housing growth agenda. 1.5. Avant Homes would like to make comments on the following policies in the Doncaster Local Plan 2015-2035 Publication Version: - General Comments - Policy 2 - Spatial strategy and settlement hierarchy - Policy 3 - Level and distribution of growth - Policy 6 - Housing Allocations - Rejected and New Sites: o Site 494: Green Lane, Scawthorpe o Site 1036: Melton Road, Newton o HELAA Site (871): Wadworth Hill, Wadworth - Policy 8 - Delivering the necessary range of housing - Policy 9 - Development affecting public rights of way - Policy 20 - Access, design and layout of public rights of way - Policy 29 - Open space provision in new developments - Policy 39 - Historic Parks and Gardens - Policy 46 - Housing design standards - Policy 66 - Developer contributions - Policy 67 - Development viability 1.6. In each case, observations are set out with reference to the provisions of the Framework and where necessary, amendments are suggested to ensure that the Local Plan is found sound. 1.7. Avant Homes welcomes the opportunity for further engagement and the opportunity to appear at the Examination in Public. 1.8. We trust that you will confirm that these representations are duly made and will give due consideration to these comments. 1.9. Please do not hesitate to contact us to discuss any issues raised in this Representation further.

Summary:
Avant homes have numerous deliverable sites they are promoting and provide comments to ensure the plan is found sound.

Response:
3.1. Avant Homes is concerned that the Doncaster Local Plan - Publication Plan is deficient in its content and the evidence base does not reflect national guidance. Test of Soundness

3.2. Avant Homes considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy

3.3. Avant Homes is concerned that the Local Plan does not reflect the Framework (2019). Avant Homes is concerned that there is a lack of up to date, available, and robust evidence base to accompany the Plan, particularly in respect of an up to date Housing Needs Assessment, whilst a 2019 update is referred to in the Plan, it is not yet publically available, the Viability Evidence (May 2019), which requires further testing to support its conclusion, and specific evidence to justify key policies. 3.4. Avant Homes consider that the Policies in the Local Plan are not justified and does not provide an appropriate strategy. The Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 3.5. In these circumstances, Avant Homes do not consider the Doncaster Local Plan, in its current form, to be sound. 3.6. However, Avant Homes consider that the plan can be made sound subject to proposed changes as set out within the following sections of these representations. Avant Homes will continue to work with the Council to develop appropriate modifications to the Local Plan.

Proposed Change 3.7. To overcome the objection and address soundness matters, the Council should:

- Review and make available supporting evidence for the plan as indicated in these representations;
- Review and provide additional testing in the Whole Plan Viability Report; and
- Respond to the evidence and provide increased flexibility in the Plan, refer to specific proposed changes under each policy.

Summary:
To overcome the objection and address soundness matters, the Council should: - Review and make available supporting evidence for the plan as indicated in these representations; - Review and provide additional testing in the Whole Plan Viability Report; and - Respond to the evidence and provide increased flexibility in the Plan, refer to specific proposed changes under each policy.

Response:
1. Spawforths have been instructed by Avant Homes to submit representations to the Doncaster Local Plan 2015-2035 Publication Version and for their site at Doncaster Road, Hatfield (Site 170). 1.2. Avant Homes welcomes the opportunity to contribute to the Doncaster Local Plan and are keen to further the role of Doncaster within the Sheffield City Region, South Yorkshire and the Yorkshire and Humber Region as a whole. 1.3. Avant Homes have a significant land interest in the area which can positively contribute towards the economic and housing growth agenda. 1.4. Avant Homes would like to make comments on the following policies in the Doncaster Local Plan 2015-2035 Publication Draft:

- Policy 6 - Housing Allocations, Site 170: Doncaster Road Hatfield.
- Policy 8 - Delivering the Necessary Range of Housing.
- Policy 14 - Promoting Sustainable Transport in New Developments.
- Policy 27 - Green Infrastructure.
- Policy 29 - Open Space in New Developments.
- Policy 42 - Character and Local Distinctiveness.
- Policy 43 - Good Urban Design.
- Policy 46 - Housing Design Standards.
- Policy 66 - Developer Contributions.
- Policy 67 - Development viability.

1.5. In each case, observations are set out below with reference to the provisions of the Framework and amendments are suggested to ensure that the Local Plan is made sound. 1.6. Avant Homes welcome the opportunity for further engagement and the opportunity to appear at the Examination in Public. 1.7. We trust that you will confirm that these representations are duly made and will give due consideration to these comments. 1.8. Please do not hesitate to contact us to discuss any issues raised in this Representation further.

Summary:
Comments noted.

Response:
This statement, prepared by Lichfields on behalf of Hallam Land Management, provides a response to Doncaster Council’s ("the Council") Local Plan Publication Draft Consultation. This response is prepared in regard to our client’s land interests at Woodhouse Lane, Hatfield and considers whether the emerging Local Plan has been positively prepared, is justified, is effective and is consistent with national policy.

**Summary:**
This statement, prepared by Lichfields on behalf of Hallam Land Management, provides a response to Doncaster Council’s ("the Council") Local Plan Publication Draft Consultation. This response is prepared in regard to our client’s land interests at Woodhouse Lane, Hatfield and considers whether the emerging Local Plan has been positively prepared, is justified, is effective and is consistent with national policy.

**Response:**
Noted
3.1. Priority Space is concerned that the Doncaster Local Plan - Publication Plan is deficient in its content and the evidence base does not reflect national guidance. Test of Soundness 3.2. Priority Space considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 3.3. Priority Space is concerned that the draft Local Plan does not reflect the Framework (2019). Priority Space is concerned that the housing requirement does not reflect economic growth ambitions, the level of employment allocations, nor is it sufficient to meet the identified needs for affordable housing. Further Priority Space are concerned that there are insufficient housing allocations to meet the housing requirement. 3.4. Priority Space is concerned that there is a lack of up to date Housing Needs Assessment, whilst a 2019 update is referred to in the Plan, it is not yet publically available, the Viability Evidence (May 2019), which requires further testing to support its conclusion, and specific evidence to justify key policies 3.5. Priority Space consider that the Policies in the Local Plan are not justified and does not provide an appropriate strategy. The Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 3.6. In these circumstances, Priority Space do not consider the Doncaster Local Plan, in its current form, to be sound. 3.7. However, Priority Space consider that the plan can be made sound subject to proposed changes as set out within the following sections of these representations. Priority Space will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 3.8. To overcome the objection and address soundness matters, the Council should: - Identify a higher housing requirement to meet economic and affordable housing ambitions and needs. - Identify sufficient supply of housing to meet the identified housing requirement. - Review and make available supporting evidence for the Plan as indicated in these representations. - Review and provide additional testing in the Whole Plan Viability Report; and - Respond to the evidence and provide increased flexibility in the Plan, refer to specific proposed changes under each policy.

Summary:
General 1. Housing requirement does not reflect the growth ambitions or the level of employment allocations. 2. Housing requirement does not meet the need for affordable housing. 3. Lack of an up to date housing needs assessment. 4. Local Plan in current form is not consistent with national Policy. Proposed changes: 1. Higher housing requirement 2. Review of supporting evidence 3. Additional 'whole plan viability report' required. 4. Increased flexibility

Response:
1.1. Spawforths have been instructed by Priority Space Ltd to submit representations to the Doncaster Local Plan 2015-2035 Publication Version, for their site at Askern Road, Carcroft. 1.2. Appended to these representations is a report assessing the housing requirement, prepared by Regeneris Consulting. 1.3. Priority Space welcomes the opportunity to contribute to the emerging Local Plan for Doncaster and is keen to further the role of Doncaster within the Sheffield City Region, South Yorkshire and the Yorkshire and Humber Region as a whole. 1.4. Priority Space has significant land interests in the area, which can positively contribute towards the economic and housing growth agenda. 1.5. Priority Space would like to make comments on the following topics and sections in the Doncaster Local Plan 2015-2035 Publication Version: - General Comments - Policy 2 - Spatial strategy and settlement hierarchy - Policy 3 - Level and distribution of growth - Policy 6 - Housing Allocations - Sites 273: Askern Road, Carcroft - Policy 8 - Delivering the necessary range of housing - Policy 19 - Development affecting public rights of way - Policy 20 - Access, design and layout of public rights of way - Policy 29 - Open space provision in new developments - Policy 46 - Housing design standards - Policy 66 - Developer contributions - Policy 67 - Development viability. 1.6. In each case, observations are set out with reference to the provisions of the Framework and where necessary, amendments are suggested to ensure that the Local Plan is found sound. 1.7. Priority Space welcomes the opportunity for further engagement and the opportunity to appear at the Examination in Public. 1.8. We trust that you will confirm that these representations are duly made and will give due consideration to these comments. 1.9. Please do not hesitate to contact us to discuss any issues raised in this Representation further.

Summary:

General 1. Housing requirement does not reflect the growth ambitions or the level of employment allocations. 2. Housing requirement does not meet the need for affordable housing. 3. Lack of an up to date housing needs assessment. 4. Local Plan in current form is not consistent with national Policy. Proposed changes: 1. Higher housing requirement 2. Review of supporting evidence 3. Additional 'whole plan viability report' required. 4. Increased flexibility
Comment: 3.1. Firsure is concerned that the Doncaster Local Plan - Publication Plan is deficient in its content and the evidence base does not reflect national guidance. Test of Soundness 3.2. Firsure considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 3.3. Firsure is concerned that the draft Local Plan does not reflect the Framework (2019). Firsure is concerned that the housing requirement does not reflect economic growth ambitions, the level of employment allocations, nor is it sufficient to meet the identified needs for affordable housing. Further Firsure are concerned that there are insufficient housing allocations to meet the housing requirement. 3.4. Firsure is concerned that there is a lack of up to date, available, and robust evidence base to accompany the Plan, particularly in respect of an up to date Housing Needs Assessment, whilst a 2019 update is referred to in the Plan, it is not yet publically available, the Viability Evidence (May 2019), which requires further testing to support its conclusion, and specific evidence to justify key policies. 3.5. Firsure consider that the Policies in the Local Plan are not justified and does not provide an appropriate strategy. The Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 3.6. In these circumstances, Firsure do not consider the Doncaster Local Plan, in its current form, to be sound. 3.7. However, Firsure consider that the plan can be made sound subject to proposed changes as set out within the following sections of these representations. Firsure will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 3.8. To overcome the objection and address soundness matters, the Council should: - Identify a higher housing requirement to meet economic and affordable housing ambitions and needs. - Identify sufficient supply of housing to meet the identified housing requirement. - Review and make available supporting evidence for the Plan as indicated in these representations. - Review and provide additional testing in the Whole Plan Viability Report; and - Respond to the evidence and provide increased flexibility in the Plan, refer to specific proposed changes under each policy.

Summary: The housing requirement does not reflect economic growth ambitions, the level of employment allocations, nor is it sufficient to meet the identified needs for affordable housing. Furthermore, there are insufficient housing allocations to meet the housing requirement. There is a lack of up to date, available, and robust evidence base to accompany the Plan, particularly in respect of an up to date Housing Needs Assessment and the Viability Evidence (May 2019) which requires further testing to support its conclusion, and specific evidence to justify key policies. The Council should: - Identify a higher housing requirement to meet economic and affordable housing ambitions and needs. - Identify sufficient supply of housing to meet the identified housing requirement. - Review and make available supporting evidence for the Plan as indicated in these representations. - Review and provide additional testing in the Whole Plan Viability Report; and - Respond to the evidence and provide increased flexibility in the Plan, refer to specific proposed changes under each policy.

Response:
1.1. Spawforths have been instructed by Firsure Ltd to submit representations to the Doncaster Local Plan 2015-2035 Publication Version and for their site at Stripe Road, Rossington. 1.2. Appended to these representations is a report assessing the housing requirement, prepared by Regeneris Consulting. (SEE EMAIL FOR Regeneris Report) 1.3. Firsure welcomes the opportunity to contribute to the emerging Local Plan for Doncaster and is keen to further the role of Doncaster within the Sheffield City Region, South Yorkshire and the Yorkshire and Humber Region as a whole. 1.4. Firsure has significant land interests in the area, which can positively contribute towards the economic and housing growth agenda.

1.5. Firsure would like to make comments on the following topics and sections in the Doncaster Local Plan 2015-2035 Publication Draft:

- General Comments
- Policy 2 - Spatial strategy and settlement hierarchy
- Policy 3 - Level and distribution of growth
- Policy 6 - Housing Allocations to Sites 302 and 305: Stripe Road, Rossington
- Policy 8 - Delivering the necessary range of housing
- Policy 19 - Development affecting public rights of way
- Policy 20 - Access, design and layout of public rights of way
- Policy 29 - Open space provision in new developments
- Policy 46 - Housing design standards
- Policy 66 - Developer contributions
- Policy 67 - Development viability

1.6. In each case, observations are set out with reference to the provisions of the Framework and where necessary, amendments are suggested to ensure that the Local Plan is found sound. 1.7. Firsure welcomes the opportunity for further engagement and the opportunity to appear at the Examination in Public. 1.8. We trust that you will confirm that these representations are duly made and will give due consideration to these comments. 1.9. Please do not hesitate to contact us to discuss any issues raised in this Representation further.
Comment:

3.1. Metroland is concerned that the Doncaster Local Plan - Publication Plan is deficient in its content and the evidence base does not reflect national guidance. Test of Soundness 3.2. Metroland considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy Justification 3.3. Metroland is concerned that the Local Plan does not reflect the Framework (2019). Metroland is concerned that there is a lack of up to date, available, and robust evidence base to accompany the Plan, particularly in respect of an up to date Housing Needs Assessment, whilst a 2019 update is referred to in the Plan, it is not yet publically available, the Viability Evidence (May 2019), which requires further testing to support its conclusion, and further evidence is required to justify key policies. 3.4. Metroland consider that the Policies in the Local Plan are not justified and does not provide an appropriate strategy. The Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 3.5. In these circumstances, Metroland do not consider the Doncaster Local Plan, in its current form, to be sound. 3.6. However, Metroland consider that the plan can be made sound subject to proposed changes as set out within the following sections of these representations. Metroland will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 3.7. To overcome the objection and address soundness matters, the Council should: - Review and make available supporting evidence for the plan as indicated in these representations; - Review and provide additional testing in the Whole Plan Viability Report; and - Respond to the evidence and provide increased flexibility in the Plan, refer to specific proposed changes under each policy.

Summary:

Proposed Change To overcome the objection and address soundness matters, the Council should: - Review and make available supporting evidence for the plan as indicated in these representations; - Review and provide additional testing in the Whole Plan Viability Report; and - Respond to the evidence and provide increased flexibility in the Plan, refer to specific proposed changes under each policy.

Response:
1.1. Spawforths have been instructed by Metroland to submit representations to the Doncaster Local Plan 2015-2035 Publication Version and for their site at Alverley Lane, Balby (Site 115). 1.2. Metroland welcomes the opportunity to contribute to the Doncaster Local Plan and are keen to further the role of Doncaster within the Sheffield City Region, South Yorkshire and the Yorkshire and Humber Region as a whole. 1.3. Metroland have a significant land interest in the area which can positively contribute towards the economic and housing growth agenda. 1.4. Metroland would like to make comments on the following policies in the Doncaster Local Plan 2015-2035 Publication Draft:

- General Comments
- Policy 6 - Housing Allocations
  - Site 115: Alverley Lane, Balby; MUA
- Policy 8 - Delivering the Necessary Range of Housing
- Policy 14 - Promoting Sustainable Transport in New Developments
- Policy 19 - Development Affecting Public Rights of Way
- Policy 20 - Access, Design and Layout of public rights of Way
- Policy 27 - Green Infrastructure
- Policy 29 - Open Space in New Developments
- Policy 42 - Character and Local Distinctiveness
- Policy 43 - Good Urban Design
- Policy 46 - Housing Design Standards
- Policy 66 - Developer Contributions
- Policy 67 - Development viability
- Housing Site 115; Alverley Lane, Balby; MUA

1.5. In each case, observations are set out below with reference to the provisions of the Framework and amendments are suggested to ensure that the Local Plan is made sound. 1.6. Metroland welcome the opportunity for further engagement and the opportunity to appear at the Examination in Public. 1.7. We trust that you will confirm that these representations are duly made and will give due consideration to these comments. 1.8. Please do not hesitate to contact us to discuss any issues raised in this Representation further.

Summary:

Comments noted.

Response:
Comment: On behalf of our client, FCC Environment (FCC), we are writing to make representations in response to the Doncaster Local Plan Publication Draft Consultation. FCC are making representations in respect of their landholdings at i) Barnsdale Bar, an active limestone quarry; and ii) Bootham Lane, an active landfill site. FCC Environment is one of the largest waste and resource management companies in the UK; employing over 2,400 staff and operating more than 200 facilities in England, Scotland and Wales. Each year they handle around 15 million tonnes of household, commercial and industrial waste including waste from contracts with more than 50 local authorities across England, Scotland and Wales.

Summary: Introduction to representations made by FCC Environment, summarised elsewhere.

Response: comment noted
We are instructed by Hallam Land Management & Henry Boot Developments ("HLM/HBD") to submit representations on a number of a strategic and allocation policies. Our view is that the submitted Publication Draft of the Local Plan is unsound and the reasons for this are explained in detail below. HLM/HBD is promoting a number of sites in the Adwick & Woodlands area and these are identified in the plan (ref: 8915-L-01A) appended to these representations and have been subject to previous representations. HLM/HBD is the appointed development partner of the landowner and their appointment represents a significant step forward in the planning and delivery of the sites.

Summary:
The Local Plan is unsound. Hallam Land Management are the appointed development partner of the landowner which represents a significant step forward in planning and delivery of sites.
This Local Plan representation has been prepared by DLP Planning Ltd on behalf of A J Atkinson & Sons in response to the publication of the Doncaster Local Plan (Regulation 19) for consultation. This representation relates to Manor Farm, Marr. This representation should be read alongside the formal response form that has also been completed and submitted in relation to the site. Site and Context The site at Manor Farm measures 1ha in total and is located to south of Barnsley Road, within the village of Marr, which lies 7km to the north west of the centre of Doncaster. The site lies opposing Church Lane to the north east, Grove Court to the immediate north, and with Blacksmiths Lane to the west. (SEE EMAIL FOR Fig.1 - Aerial view of the site) The site has historically been in agricultural use; with the more modern agricultural sheds still used for storing of crops. The farmstead comprises Grade II Listed Buildings, as illustrated in Figure 2 below. The later parts of the building which form the western extent of the farmstead are not detailed within the Listing, but due to their proximity and relationship are considered as curtilage listed. The Farmhouse which is situated to the south of the site and outside the red line is also Grade II listed (ref: SE5139205163) and comprises a prominent two storey render dwelling which is occupied by the site owners and operator of the farm holding. Planning History An application reference: 17/02585/FULM and 17/02586/LBCM for erection of 7 new dwellings and the conversion of existing buildings to form 5 dwellings, with the repair of colonnade feature, access, landscaping and addition of stone wall to Barnsley Road was approved by Doncaster Council on 28th August 2019. The site is currently being marketed with planning permission and it anticipated that the sale will be agreed shortly.

Summary:
Re site at Manor farm Marr o Greenbelt in Local Plan. o Site has planning permission (17/02586 Aug 2019) for 7 dwellings and conversion of existing dwellings. o Requests that site is removed from Greenbelt to reflect PP. o Also wants adjacent land to west of the site taken out of the GB to provide a "logical rounding off" to the settlement of Marr.

Response:
Comment:

1.1 Following instructions from Polypipe Ltd, ID Planning are commissioned to make representations to the Doncaster Publication Local Plan consultation, September 2019.  1.2 These representations are made in the specific context of the development potential of two areas of land off Broomhouse Lane, Edlington which support the growth of the existing Polypipe operation in accordance with the growth strategy which seeks to support existing businesses to expand.  1.3 Polypipe Building products operate from two sites in Doncaster manufacturing above and below ground plastic building products used in housebuilding and the DIY market.  1.4 The company headquarters are at their site on Broomhouse Lane industrial estate where they have operated from for 40 years. The site employs approximately 850 staff, many of whom come from the local area.  1.5 The site is constrained and additional expansion areas are required to ensure the efficient and viable operation of the business in the future.  1.6 The areas of land that are being promoted for development are shown on the plans attached at Appendix 1 and comprise; - Site 1 - Land to the north east of the existing Polypipe site. Site is bounded by Broomhouse Lane and Lords Head Lane, Edlington. - Site 2 - Land to the south of Broomhouse Lane. Site comprises the existing car park and land immediately to the south. (SEE EMAIL FOR PLAN) (THIS REP IS FOR ONE SITE - FOR OTHER SITE SEE REP 05311)  1.7 Polypipe own site 1 and part of site 2, currently used as car parking. The remainder of the proposed development site is public open space and in the ownership of Doncaster Council.  1.8 A review of the Publication Local Plan has been undertaken in conjunction with consideration of the Councils evidence base.  1.9 These representations seek to make comment on the relevant parts of the Publication Plan and to promote the two sites at Edlington for identification as employment land to provide short and long term employment land to allow Polypipe, one of the regions large employers to continue to operate in an efficient and effective way in Doncaster.

Response:

"Attend Examination: Attend Hearing"

Reason: Attendance at the hearing will enable a thorough discussion regarding the deliverability of the strategy of the plan.

Area: Miscellaneous - Introductions
1.1. These representations have been prepared by Savills (UK) Ltd on behalf of Miller Homes in response to the Doncaster Publication Draft Local Plan and in support of the land at Grange Farm, Doncaster identified on the attached Site Location Plan (Appendix 1), with the proposals explained in the Vision Framework Document (Appendix 2). (SEE EMAIL FOR Appendices) 1.2. The thrust of these representations is to share the significant concerns we have over DMBC's current strategy to allocate sufficient developable housing sites within the Main Urban Area of Doncaster. Having established a minimum target for the MUA of 17,262 dwellings against a supply of 7,445 dwellings based on our initial assessment the current draft strategy shows a shortfall of -9,817 dwellings. 1.3. It is therefore recommended that new sites should come forward which can clearly demonstrate developability and deliverability. The land at Grange Farm represents an opportunity to deliver essential growth adjacent to the Main Urban Area of Doncaster. Comments have also been made in relation to location of housing, housing mix, affordable housing and sustainable transport. 1.4. The land at Grange Farm represents an opportunity to deliver essential growth adjacent to the Main Urban Area of Doncaster. Comments have also been made in relation to location of housing, housing mix, affordable housing and sustainable transport and Neighbourhood Planning. 1.5. The Vision Document (Appendix 2) outlines a strong vision and opportunity for high quality place making on the site, whilst also setting out the headline deliverability and developability of the land for c.264 new homes. The Document demonstrates how the site constitutes sustainable development in the context of the National Planning Policy Framework (NPPF), paragraph 11, and how the development of this site can deliver high quality sustainable, well connected housing in accordance with the emerging plan. The site should clearly be a preferred option and future development site. 1.6. This representation has been prepared in accordance with paragraph 35 of the NPPF which states plans must be: a. Positively prepared - providing a strategy which, as a minimum, seeks to meet the area's LHN; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; b. Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; c. Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and d. Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in this Framework. 1.7. The following sections of this report are arranged as follows: - Section 2: Provides background to the site; - Section 3: Sets out our comments on the Initial Draft Local Plan; - Section 4: Outlines the Vision and Developability of the site; and, - Section 5: Concludes and summarises the report.

Summary:

Representation by Savills on behalf of Miller Homes and Grange Farm. Significant concern over the strategy to allocate sufficient developable housing sites within the urban area. Having established a minimum target for the MUA of 17,262 dwellings against a supply of 7,445 dwellings based on our initial assessment the current draft strategy shows a shortfall of -9,817 dwellings. New sites must therefore come forward which can clearly demonstrate developability and deliverability. Grange Farm presents a chance to deliver essential growth adjacent to the urban area. There is a strong vision and opportunity for high quality place making on the site - deliverable and developable land for c. 264 new homes. The site can be high quality, sustainable and well connected housing. Site should clearly be preferred.

Response:

Noted - introductory comments with the detail being picked up through the various parts of the local plan the Representation refers to elsewhere in this summary/response document.
2.1 Thorne is defined as one of the Boroughs Main Towns and is expected to accommodate 510 - 1,020 dwellings which equates to 5.5% of the 40% of new homes allocated to this centre over the plan period. The Policies Map allocates sites (without planning permission) capable of supporting just 345 dwellings (736 dwellings including allocations with permission) within Thorne/Moorends, allowing few opportunities for choice and competition in the local housing market and a reduced delivery of much needed affordable housing. The reminder of the proposed allocations to Moorends is made up of sites with extant planning permission, although not necessarily being delivered or capable of being delivered.  

2.2 Don Parkinson is concerned that the number of dwellings proposed to be allocated for the Borough has been significantly underestimated in this iteration of the Local Plan. We note that this concern has been shared by a number of other parties during the local plan consultation process, with a number of the parties raising similar concerns as part of earlier representations. In summary, Don Parkinson considers that contrary to the Council’s latest claims in relation to its housing needs, the number of houses currently identified will not meet the objectively assessed housing needs of the community over the plan period, particularly in locations such as Thorne/Moorends where significant employment growth is expected.
Comment:

1. Lichfields is instructed by Don Parkinson Partnership (Don Parkinson) to make representations to the Publication Version of the Doncaster Local Plan published for consultation by Doncaster Council (the Council) on 12 August 2019. 1.2 These representations relate specifically to an area of land measuring approximately 32 ha in size between the existing built up areas of Thorne and Moorends, identified in earlier iterations of the draft local plan as Sites 002, 003, 004 and 005, and referred to for the remainder of these representations as the ‘subject site’ (Appendix 01). They build on earlier representations made by J R A Moorhouse Planning to the Draft Policies and Proposed Sites October 2018 consultation on behalf of the same landowner. (SEE EMAIL FOR Appendices) 1.3 The land is in the full control of Don Parkinson, the site is strategically positioned to accommodate housing and there are no insurmountable constraints to bringing this land forward for development as an allocation in the Local Plan. Further, there is no justification for reversing the Council’s previous decision to allocate the land for housing development in the previous draft Local Plan. 1.4 The land (and wider Thorne/Moorends settlement) has long been recognised as a sustainable location for growth. The Draft Sites and Policies DPD (2014) identified the northern and southern section of the site as a residential allocation (Appendix 02). The Housing and Economic Land Availability Assessments (2018) identifies the full site as available, deliverable & developable within the first 6-10 years, capable of supporting 754 units and suitable for development but with national policy or physical constraints. The Settlement Profiles, Local Plan Evidence Base (2018) report identified the settlement as having excellent access via road and rail and “one of the best scoring settlements against the Settlement Audit Criteria.” 1.5 Despite the site’s obvious strengths and long-standing history as a preferred location for residential growth, the Publication Draft of the Local Plan fails to identify the site as a preferred location for residential growth. 1.6 The remainder of these representations are dedicated to demonstrating that the Plan in its current form is unsound when considering relevant national policies, and that despite the Council’s latest conclusions on the suitability of this site for housing, there are no insurmountable constraints to bringing the subject site forward in the plan period. In particular, it is the view of Don Parkinson that the Plan fails to deliver a sustainable pattern of development, by not allocating sufficient growth to Thorne/Moorends in line with the Plan’s own hierarchy.

Summary:

The land in question measures 32 ha between Thorne and Moorends. It was identified in earlier versions of the plan as Sites 002, 003, 004 and 005. It is solely owned by one person and there are no insurmountable constraints to bringing this land forward for development. There is no reason for the Council to reverse its decision to allocate the land for housing. The land (as well as Thorne and Moorends) is recognised as a sustainable location for growth and the Draft Sites and Policies DPD identified the northern and southern sections of the site for a residential allocation. The HELAA identifies the site as ‘available, deliverable and developable within the first 6-10 years, and capable of supporting 754 units and is suitable for development but with national policy or physical constraints. The Settlement Profile report identifies the settlement as having excellent access via road and rail and one of the best scoring settlements. The Plan is currently unsound against national policies and there are no insurmountable constraints to bringing the subject site forward in the plan period. The Plan currently fails to deliver a sustainable pattern of development, by not allocating sufficient growth to Thorne/Moorends in line with the Plan’s own hierarchy.

Response:
2.1 Thorne is defined as one of the Boroughs Main Towns and is expected to accommodate 510 - 1,020 dwellings which equates to 5.5% of the 40% of new homes allocated to this centre over the plan period. The Policies Map allocates sites (without planning permission) capable of supporting just 345 dwellings (736 dwellings including allocations with permission) within Thorne/Moorends, allowing few opportunities for choice and competition in the local housing market and a reduced delivery of much needed affordable housing. The remainder of the proposed allocations to Moorends is made up of sites with extant planning permission, although not necessarily being delivered or capable of being delivered.  

2.2 Don Parkinson is concerned that the number of dwellings proposed to be allocated for the Borough has been significantly underestimated in this iteration of the Local Plan. We note that this concern has been shared by a number of other parties during the local plan consultation process, with a number of the parties raising similar concerns as part of earlier representations. In summary, Don Parkinson considers that contrary to the Council’s latest claims in relation to its housing needs, the number of houses currently identified will not meet the objectively assessed housing needs of the community over the plan period, particularly in locations such as Thorne/Moorends where significant employment growth is expected.
Lichfields

1.1 Lichfields is instructed by Don Parkinson Partnership (Don Parkinson) to make representations to the Publication Version of the Doncaster Local Plan published for consultation by Doncaster Council (the Council) on 12 August 2019. These representations relate specifically to an area of land measuring approximately 32 ha in size between the existing built up areas of Thorne and Moorends, identified in earlier iterations of the draft local plan as Sites 002, 003, 004 and 005, and referred to for the remainder of these representations as the 'subject site' (Appendix 01). They build on earlier representations made by J R A Moorhouse Planning to the Draft Policies and Proposed Sites October 2018 consultation on behalf of the same landowner. (SEE EMAIL FOR Appendices) 1.3 The land is in the full control of Don Parkinson, the site is strategically positioned to accommodate housing and there are no insurmountable constraints to bringing this land forward for development as an allocation in the Local Plan. Further, there is no justification for reversing the Council's previous decision to allocate the land for housing development in the previous draft Local Plan. 1.4 The land (and wider Thorne/Moorends settlement) has long been recognised as a sustainable location for growth. The Draft Sites and Policies DPD (2014) identified the northern and southern section of the site as a residential allocation (Appendix 02). The Housing and Economic Land Availability Assessments (2018) identifies the full site as available, deliverable & developable within the first 6-10 years, capable of supporting 754 units and suitable for development but with national policy or physical constraints. The Settlement Profiles, Local Plan Evidence Base (2018) report identified the settlement as having excellent access via road and rail and "one of the best scoring settlements against the Settlement Audit Criteria". 1.5 Despite the site's obvious strengths and long-standing history as a preferred location for residential growth, the Publication Draft of the Local Plan fails to identify the site as a preferred location for residential growth. 1.6 The remainder of these representations are dedicated to demonstrating that the Plan in its current form is unsound when considering relevant national policies, and that despite the Council's latest conclusions on the suitability of this site for housing, there are no insurmountable constraints to bringing the subject site forward in the plan period. In particular, it is the view of Don Parkinson that the Plan fails to deliver a sustainable pattern of development, by not allocating sufficient growth to Thorne/Moorends in line with the Plan's own hierarchy.

Summary:
The land in question measures 32 ha between Thorne and Moorends. It was identified in earlier versions of the plan as Sites 002, 003, 004 and 005. It is solely owned by one person and there are no insurmountable constraints to bringing this land forward for development. There is no reason for the Council to reverse its decision to allocate the land for housing. The land (as well as Thorne and Moorends) is recognised as a sustainable location for growth and the Draft Sites and Policies DPD identified the northern and southern sections of the site for a residential allocation. The HELAA identifies the site as ‘available, deliverable and developable within the first 6-10 years, and capable of supporting 754 units and is suitable for development but with national policy or physical constraints. The Settlement Profile report identifies the settlement as having excellent access via road and rail and is one of the best scoring settlements. The Plan is currently unsound against national policies and there are no insurmountable constraints to bringing the subject site forward in the plan period. The Plan currently fails to deliver a sustainable pattern of development, by not allocating sufficient growth to Thorne/Moorends in line with the Plan's own hierarchy.
Comment:
2.1 Thorne is defined as one of the Boroughs Main Towns and is expected to accommodate 510 - 1,020 dwellings which equates to 5.5% of the 40% of new homes allocated to this centre over the plan period. The Policies Map allocates sites (without planning permission) capable of supporting just 345 dwellings (736 dwelling including allocations with permission) within Thorne/Moorends, allowing few opportunities for choice and competition in the local housing market and a reduced delivery of much needed affordable housing. The remainder of the proposed allocations to Moorends is made up of sites with extant planning permission, although not necessarily being delivered or capable of being delivered. 2.2 Don Parkinson is concerned that the number of dwellings proposed to be allocated for the Borough has been significantly underestimated in this iteration of the Local Plan. We note that this concern has been shared by a number of other parties during the local plan consultation process, with a number of the parties raising similar concerns as part of earlier representations. In summary, Don Parkinson considers that contrary to the Council’s latest claims in relation to its housing needs, the number of houses currently identified will not meet the objectively assessed housing needs of the community over the plan period, particularly in locations such as Thorne/Moorends where significant employment growth is expected.

Summary:
Thorne is a main Town and is expected to accommodate 510 - 1,020 dwellings equating to 5.5% of the 40% of new homes. The Policies Map allocates sites (without planning permission) capable of supporting 345 dwellings (736 dwellings including allocations with permission) within Thorne/Moorends. There are few opportunities for choice and competition in the local housing market and a reduced delivery of much needed affordable housing. The remainder of the Moornds allocations are sites with extant planning permission and may not be delivered or capable of being delivered. Concerned that the number of dwellings proposed for the borough has been significantly underestimated. This concern was raised by a number of parties as part of earlier representations. The number of identified houses will not meet the objectively assessed housing need in areas such as Thorne and Moorends where significant employment growth is expected.

Response:
Comment:  

1. Lichfields is instructed by Don Parkinson Partnership (Don Parkinson) to make representations to the Publication Version of the Doncaster Local Plan published for consultation by Doncaster Council (the Council) on 12 August 2019. 1.2 These representations relate specifically to an area of land measuring approximately 32 ha in size between the existing built up areas of Thorne and Moorends, identified in earlier iterations of the draft local plan as Sites 002, 003, 004 and 005, and referred to for the remainder of these representations as the 'subject site' (Appendix 01) They build on earlier representations made by J R A Moorhouse Planning to the Draft Policies and Proposed Sites October 2018 consultation on behalf of the same landowner. (SEE EMAIL FOR Appendices) 1.3 The land is in the full control of Don Parkinson, the site is strategically positioned to accommodate housing and there are no insurmountable constraints to bringing this land forward for development as an allocation in the Local Plan. Further, there is no justification for reversing the Council's previous decision to allocate the land for housing development in the previous draft Local Plan. 1.4 The land (and wider Thorne/Moorends settlement) has long been recognised as a sustainable location for growth. The Draft Sites and Policies DPD (2014) identified the northern and southern section of the site as a residential allocation (Appendix 02). The Housing and Economic Land Availability Assessments (2018) identifies the full site as available, deliverable & developable within the first 6-10 years, capable of supporting 754 units and suitable for development but with national policy or physical constraints. The Settlement Profiles, Local Plan Evidence Base (2018) report identified the settlement as having excellent access via road and rail and "one of the best scoring settlements against the Settlement Audit Criteria" 1.5 Despite the site's obvious strengths and long-standing history as a preferred location for residential growth, the Publication Draft of the Local Plan fails to identify the site as a preferred location for residential growth. 1.6 The remainder of these representations are dedicated to demonstrating that the Plan in its current form is unsound when considering relevant national policies, and that despite the Council's latest conclusions on the suitability of this site for housing, there are no insurmountable constraints to bringing the subject site forward in the plan period. In particular, it is the view of Don Parkinson that the Plan fails to deliver a sustainable pattern of development, by not allocating sufficient growth to Thorne/Moorends in line with the Plan's own hierarchy.

Summary:  
The land in question measures 32 ha between Thorne and Moorends. It was identified in earlier versions of the plan as Sites 002, 003, 004 and 005. It is solely owned by one person and there no insurmountable constraints to bringing this land forward for development. There is no reason for the Council to reverse its decision to allocate the land for housing. The land (as well as Thorne and Moorends) is recognised as a sustainable location for growth and the Draft Sites and Policies DPD identified the northern and southern sections of the site for a residential allocation. The HELAA identifies the site as 'available, deliverable and developable within the first 6-10 years, and capable of supporting 754 units and is suitable for development but with national policy or physical constraints. The Settlement Profile report identifies the settlement as having excellent access via road and rail and is one of the best scoring settlements. The Plan is currently unsound against national policies and there are no insurmountable constraints to bringing the subject site forward in the plan period. The Plan currently fails to deliver a sustainable pattern of development, by not allocating sufficient growth to Thorne/Moorends in line with the Plan's own hierarchy.

Response:
2.1 Thorne is defined as one of the Boroughs Main Towns and is expected to accommodate 510 - 1,020 dwellings which equates to 5.5% of the 40% of new homes allocated to this centre over the plan period. The Policies Map allocates sites (without planning permission) capable of supporting just 345 dwellings (736 dwelling including allocations with permission) within Thorne/Moorends, allowing few opportunities for choice and competition in the local housing market and a reduced delivery of much needed affordable housing. The remainder of the proposed allocations to Moorends is made up of sites with extant planning permission, although not necessarily being delivered or capable of being delivered.  

2.2 Don Parkinson is concerned that the number of dwellings proposed to be allocated for the Borough has been significantly underestimated in this iteration of the Local Plan. We note that this concern has been shared by a number of other parties during the local plan consultation process, with a number of the parties raising similar concerns as part of earlier representations. In summary, Don Parkinson considers that contrary to the Council’s latest claims in relation to its housing needs, the number of houses currently identified will not meet the objectively assessed housing needs of the community over the plan period, particularly in locations such as Thorne/Moorends where significant employment growth is expected.

Summary:
Thorne is a main Town and is expected to accommodate 510 - 1,020 dwellings equating to 5.5% of the 40% of new homes. The Policies Map allocates sites (without planning permission) capable of supporting 345 dwellings (736 dwellings including allocations with permission) within Thorne/Moorends. There are few opportunities for choice and competition in the local housing market and a reduced delivery of much needed affordable housing. The reminder of the Moorends allocations are sites with extant planning permission and may not be delivered or capable of being delivered. Concerned that the number of dwellings proposed for the borough has been significantly underestimated. This concern was raised by a number of parties as part of earlier representations. The number of identified houses will not meet the objectively assessed housing need in areas such as Thorne and Moorends where significant employment growth is expected.

Response:
1.1 Lichfields is instructed by Don Parkinson Partnership (Don Parkinson) to make representations to the Publication Version of the Doncaster Local Plan published for consultation by Doncaster Council (the Council) on 12 August 2019. 1.2 These representations relate specifically to an area of land measuring approximately 32 ha in size between the existing built up areas of Thorne and Moorends, identified in earlier iterations of the draft local plan as Sites 002, 003, 004 and 005, and referred to for the remainder of these representations as the ‘subject site’ (Appendix 01) They build on earlier representations made by J R A Moorhouse Planning to the Draft Policies and Proposed Sites October 2018 consultation on behalf of the same landowner. (SEE EMAIL FOR Appendices) 1.3 The land is in the full control of Don Parkinson, the site is strategically positioned to accommodate housing and there are no insurmountable constraints to bringing this land forward for development as an allocation in the Local Plan. Further, there is no justification for reversing the Council’s previous decision to allocate the land for housing development in the previous draft Local Plan. 1.4 The land (and wider Thorne/Moorends settlement) has long been recognised as a sustainable location for growth. The Draft Sites and Policies DPD (2014) identified the northern and southern section of the site as a residential allocation (Appendix 02). The Housing and Economic Land Availability Assessments (2018) identifies the full site as available, deliverable & developable within the first 6-10 years, capable of supporting 754 units and suitable for development but with national policy or physical constraints. The Settlement Profiles, Local Plan Evidence Base (2018) report identified the settlement as having excellent access via road and rail and "one of the best scoring settlements against the Settlement Audit Criteria” 1.5 Despite the site's obvious strengths and long-standing history as a preferred location for residential growth, the Publication Draft of the Local Plan fails to identify the site as a preferred location for residential growth. 1.6 The remainder of these representations are dedicated to demonstrating that the Plan in its current form is unsound when considering relevant national policies, and that despite the Council’s latest conclusions on the suitability of this site for housing, there are no insurmountable constraints to bringing the subject site forward in the plan period. In particular, it is the view of Don Parkinson that the Plan fails to deliver a sustainable pattern of development, by not allocating sufficient growth to Thorne/Moorends in line with the Plan’s own hierarchy.

Summary:
The land in question measures 32 ha between Thorne and Moorends. It was identified in earlier versions of the plan as Sites 002, 003, 004 and 005. It is solely owned by one person and there no insurmountable constraints to bringing this land forward for development. There is no reason for the Council to reverse its decision to allocate the land for housing. The land (as well as Thorne and Moorends) is recognised as a sustainable location for growth and the Draft Sites and Policies DPD identified the northern and southern sections of the site for a residential allocation. The HELAA identifies the site as ‘available, deliverable and developable within the first 6-10 years, and capable of supporting 754 units and is suitable for development but with national policy or physical constraints. The Settlement Profile report identifies the settlement as having excellent access via road and rail and is one of the best scoring settlements. The Plan is currently unsound against national policies and there are no insurmountable constraints to bringing the subject site forward in the plan period. The Plan currently fails to deliver a sustainable pattern of development, by not allocating sufficient growth to Thorne/Moorends in line with the Plan’s own hierarchy.

Response:
This Local Plan representation has been prepared by DLP Planning Ltd on behalf of 360 Degrees Media in response to the publication of the Doncaster Local Plan (Regulation 19) for consultation. This representation relates to the 'Former Doncaster College Campus, High Melton' and should be read alongside the response form that has also been completed and submitted in relation to the site. 360 Degrees Media are working alongside Doncaster Metropolitan Borough Council and Sheffield City Region to prepare proposals for a commercial film and media hub at the former Doncaster College site in High Melton. This entails the creation of film and TV studios, visual effects production facility (VFX), a film, TV and VFX training academy and hotel and events business. An element of residential development is proposed enabling development to support the wider scheme. 360 Degrees Media is focused on attracting a diverse range of new businesses to the High Melton site near Doncaster to create a unique digital ecosystem around the creative industries. Working closely with existing digital businesses in the region 360 aims to build a hub for new entrants to the industry as well as seasoned companies who can benefit from this ecosystem. In this way 360 aims, over the next 3-5 years, to build a sustainable network of companies that can support and attract larger businesses to relocate at High Melton and further expand the site as a hub for the creative and digital industries in South Yorkshire and nationally. The development has the potential to create around 6,700 new jobs in Doncaster within the film sector and its supply chain. Site and Context The site is circa 23ha in size and comprises the former Doncaster College Campus, which consists of a number of college buildings, a large car park, a number of listed buildings and open spaces. The site also encompasses the High Melton Golf Course. The southern portion of the site possesses a large band of mature trees. (SEE EMAIL FOR Fig.1: Aerial view of the site) The village of High Melton is located to the north/north-east of the site. The site bounded by agricultural land to the west, east and south. The site is located within Flood Zone 1. Proposed Allocation The draft Local Plan document and Proposals Map currently shows the site washed over by Green Belt and included within a Parks and Gardens of Local Historic Interest area as indicated in Figure 2. This is despite the long established brownfield nature of the northern portion of the site which adjoins the High Melton Settlement boundary. (SEE EMAIL Fig. 2: Policies Map Extract) DLP Planning objects to the failure of the plan to designate the site for development. To ensure the soundness of the Local Plan the remainder of this letter sets out how the Plan should be modified to address soundness.

Summary:
Re former High Melton College site. Proposals Map currently shows the site washed over by Green Belt and included within a Parks and Gardens of Local Historic Interest area. This is despite the long established brownfield nature of the northern portion of the site which adjoins the High Melton Settlement boundary. Objects to the failure of the plan to designate the site for development.
Comment:
Please find enclosed a representation prepared by Pegasus Group on behalf of Peter Kelly, Graham White, Paul Pennington and Stewart Oades in relation to Land at Paper Mill Fields, Tickhill. The representation considers the content within the Publication Draft of the Doncaster Local Plan. The representation should be read in conjunction with the accompanying representation produced by Pegasus Group to the draft policies and proposed site informal consultation in September 2018. (SEE EMAIL FOR Accompanying representation)

Summary:
Reps are provided by Pegasus Group on behalf of Peter Kelly, Graham White, Paul Pennignton & Stewart Oades in respect to land at Tickhill (Paper Mill Fields).

Response:
1.1 This representation is prepared by Pegasus Group on behalf of Peter Kelly, Graham White, Paul Pennington and Stewart Oades in relation to Land at Paper Mill Fields, Tickhill. The representation considers the content within the Publication Draft of the Doncaster Local Plan. 1.2 In compiling this representation Pegasus Group have applied the four elements of soundness referred to in the National Planning Policy Framework, which are; positively prepared, justified, effective and consistent with national policy. 1.3 This representation should be read in conjunction with the accompanying representation produced by Pegasus Group to the draft policies and proposed site informal consultation in September 2018. That document promotes the site and illustrates why is should be allocated for residential development. The purpose of this submission is to focus on the matters within the Publication Draft only, mainly the overall requirement and distribution of housing.
Comment:

1.1 Following instructions from Polypipe Ltd, ID Planning are commissioned to make representations to the Doncaster Publication Local Plan consultation, September 2019. 1.2 These representations are made in the specific context of the development potential of two areas of land off Broomhouse Lane, Edlington which support the growth of the existing Polypipe operation in accordance with the growth strategy which seeks to support existing businesses to expand. 1.3 Polypipe Building products operate from two sites in Doncaster manufacturing above and below ground plastic building products used in housebuilding and the DIY markets. 1.4 The company headquarters are at their site on Broomhouse Lane industrial Estate where they have operated from for 40 years. The site employs approximately 850 staff, many of whom come from the local area. 1.5 The site is constrained and additional expansion areas are required to ensure the efficient and viable operation of the business in the future. 1.6 The areas of land that are being promoted for development are shown on the plans attached at Appendix 1 and comprise; - Site 1 - Land to the north east of the existing Polypipe site. Site is bounded by Broomhouse Lane and Lords Head Lane, Edlington. - Site 2 - Land to the south of Broomhouse Lane. Site comprises the existing car park and land immediately to the south. (SEE EMAIL FOR Plan) (THIS REP IS FOR ONE SITE - FOR OTHER SITE SEE REP 05285) 1.7 Polypipe own site 1 and part of site 2, currently used as car parking. The remainder of the proposed development site is public open space and in the ownership of Doncaster Council. 1.8 A review of the Publication Local Plan has been undertaken in conjunction with consideration of the Council’s evidence base. 1.9 These representations seek to make comment on the relevant parts of the Publication Plan and to promote the two sites at Edlington for identification as employment land to provide short and long term employment land to allow Polypipe, one of the regions’ large employers to continue to operate in an efficient and effective way in Doncaster.

Summary:

Introduction Representations relate to - Site 1 - Land to the north east of the existing Polypipe site. Site is bounded by Broomhouse Lane and Lords Head Lane, Edlington. - Site 2 - Land to the south of Broomhouse Lane. Site comprises the existing car park and land immediately to the south. Polypipe own site 1 and part of site 2 The representations seek to make comment on the relevant parts of the Publication Plan and to promote the two sites at Edlington for identification as employment land to provide short and long term employment land to allow Polypipe (THIS REP IS FOR ONE SITE - FOR OTHER SITE SEE REP 05285)

Response:
The matters raised in our representation go to the heart of the Local Plan. It is considered that attendance at the relevant hearing sessions will allow further comment to be made where appropriate.

Please see attached correspondence, promotional and technical reports: Doncaster Council should be congratulated for progressing the Local Plan. We do raise concerns however, that the slippage in progress may have unintended consequences of the need to introduce further changes for example an extension to the Plan period to ensure consistency with national policy, of a minimum 15 year period from 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. 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 and allocated for the delivery of up to 80 dwellings in the early part of the Plan period. 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. (SEE EMAIL AND SUPPORTING DOCUMENTATION FOR ADDITIONAL DOCUMENTS)

Summary:
- Plan period should be a minimum 15 years from adoption.
- A failure to adequately address local housing needs will act as brake upon economic growth aspirations. Suggest that the housing requirement be increase accordingly, and stated as a minimum.
- Spatial strategy fails to meet needs of Carcroft and Skellow.
- Concerned 'Crabtree Lane' site will not deliver enough houses.
- Reserve site at Owston Road Carcroft is flood risk and has not been developed despite being allocated 20 years.
- Suggest land West of Ings Lane Skellow (Greenbelt) is allocated.
Comment:

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.

Summary:

Suggests Local Plan timescales are optimistic and adoption will not be until 2021.

Response:
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<th>Comment Ref:</th>
<th>C/Support JRP/0739/1/001</th>
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<tr>
<td>Name:</td>
<td>Mr Jonathan Storer</td>
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<td>Organisation:</td>
<td>Cadeby Parish Council</td>
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<td>Date:</td>
<td>30/09/2019</td>
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<tr>
<td>Area:</td>
<td>Miscellaneous - Introductions</td>
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<td>Policy:</td>
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<td>Tests of Soundness:</td>
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**Comment:**

Cadeby Parish Meeting broadly supports the response of the JRP, which will be submitted separately. There are three additions (two of which are particular to Cadeby) that we would like to make.

**Response:**

Noted. Please see response to comments of Joint Rural Parishes.
The issues are complex and require further debate during Public Examination of the Local Plan.

Please see Theakston Estates’ response to Policies 2, 3 and 6 in relation to the housing requirement, housing supply, development in the Main Urban Area and the approach to the reserve development sites.

Please see Theakston Estates’ response to Policies 2, 3 and 6 in relation to the housing requirement, housing supply, development in the Main Urban Area and the approach to the reserve development sites.

Noted
1.1. Spawfords have been instructed by Strata Homes Ltd to submit representations to the Doncaster Local Plan 2015-2035 Publication Version, for their site at Broad Axe, Scawthorpe (Site 234). 1.2. Appended to these representations is a report assessing the housing requirement, prepared by Regeneris Consulting (SEE EMAIL FOR REGENERIS REPORT) 1.3. Strata Homes welcomes the opportunity to contribute to the emerging Local Plan for Doncaster and is keen to further the role of Doncaster within the Sheffield City Region, South Yorkshire and the Yorkshire and Humber Region as a whole. 1.4. Strata Homes has significant land interests in the area, which can positively contribute towards the economic and housing growth agenda. 1.5. Strata Homes would like to make comments on the following topics and sections in the Doncaster Local Plan 2015-2035 Publication Draft: General Comments - Policy 2 - Spatial strategy and settlement hierarchy - Policy 3 - Level and distribution of growth - Policy 6 - Housing Allocations - Site 234: Broad Axe, Scawthorpe - Policy 8 - Delivering the necessary range of housing - Policy 19 - Development affecting public rights of way - Policy 20 - Access, design and layout of public rights of way - Policy 29 - Open space provision in new developments - Policy 46 - Housing design standards - Policy 66 - Developer contributions - Policy 67 - Development viability 1.6. In each case, observations are set out with reference to the provisions of the Framework and where necessary, amendments are suggested to ensure that the Local Plan is found sound. 1.7. Strata Homes welcomes the opportunity for further engagement and the opportunity to appear at the Examination in Public. 1.8. We trust that you will confirm that these representations are duly made and will give due consideration to these comments. 1.9. Please do not hesitate to contact us to discuss any issues raised in this Representation further.
Comment:

Carter Jonas LLP has been instructed by our client Harworth Group Plc (Harworth) and the Gilliat Family to submit representations to the Doncaster Publication Draft Local Plan (“the DLP”) in support of Gateway 180, Bradholme Farm, Thorne, Doncaster Site Ref. 160. The Council will be aware that representations to the emerging local plan in respect of this site were made to the September 2018 Informal Consultation, Draft Policies and Proposed Sites document, and promotion as part of previous iterations of the plan on behalf of the landowners and developers.

During this period there have also been on-going discussions between Council Officers [Planning Policy Officers], Harworth and Carter Jonas in respect of the site. In parallel with the progression of the emerging Local Plan, a pre-application enquiry was submitted on 17 May 2019 and a subsequent meeting with Officers was held on 11 July 2019 to discuss the principle of development of the site, the associated scheme specifics, the technical detail required as part of a planning application and the requirement for an Environmental Statement (ES). A copy of the pre-application response is attached in Appendix 1 for reference. An EIA screening request was subsequently submitted on 25 July 2019 (ref: 19/01782/SCRE) and a response was received on 12 August 2019 confirming that the proposed development at Gateway 180 to include employment space (B1(c) B2 and B8) with ancillary offices, including necessary earthworks, access roads, landscaping, and flood risk and drainage works due to the physical scale and potential increase in traffic, emissions, air quality and noise would require an EIA. A copy of the Screening Opinion dated 12 August 2019 is also attached within Appendix 2 for reference. Our comments and representations to the Publication Draft Local Plan are set out below. For reference these representations include the following information:

- Pre-application Response dated September 2019 (Appendix 1)
- Screening Opinion dated 12 August 2019 (Appendix 2)
- Employment Land Review, prepared by Knight Frank dated September 2019 (Appendix 3)
- Accessibility Note prepared by Development Planning Limited dated September 2019 (Appendix 4)
- Ecology Note prepared by AES-LTD dated 23rd August 2019 (Appendix 5)
- Flood Risk Technical Note prepared by BWB Consulting Ltd, dated September 2019 (Appendix 6)
- Illustrative Masterplan prepared by Harris Partnership (Appendix 8)
- Officers Report for application ref: 08/03189/FULM (Appendix 9)
- Mining and Minerals Report prepared by Geoffrey R Marsden dated June 2008 (Appendix 10)
- Agricultural Land Classification prepared by Agricultural Systems Analysis (appendix 11)
- Inspectors Letter in relation to the withdrawn Sites and Policies Development Plan document dated (SEE SERVER FOR Appendices)

In brief summary we consider that Site 160: Gateway 180, Bradholme Farm is significantly more acceptable and thus preferable in planning terms than the draft allocation at Site 001: Thorne North. Soundness Paragraph 35 of the NPPF 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.

Summary:

Carter Jonas on behalf of Harworth Group are submitting representations to the Publication Local Plan in support of Gateway 180, Bradholme Farm, Thorne (site 160). A list of information included is given. In brief summary it is considered that Site 160: Gateway 180, Bradholme Farm is significantly more acceptable and preferable in planning terms than Site 001: Thorne North.

Response:

Noted
As you will be aware, we act on behalf of Tanks & Vessels Industries (TVI) who currently own significant areas of land on the eastern / northern side of the Bankwood Lane Industrial Estate in Rossington and are considering future redevelopment proposals for their land. A plan showing the location of the site is attached (see Plan 1). INTRODUCTION ID Planning are instructed by TVI to make representations to the Doncaster Publication Draft Policies & Proposed Sites Consultation (August 2019) in relation to their land interests at Bankwood Lane Industrial Estate, Rossington. Land at Bankwood Lane Industrial Estate is largely occupied for employment and industrial uses. Our client controls an extensive area of land in the northern part of the industrial estate. With rationalisation of the business in recent years a substantial part of the main TVI site in the eastern part of the industrial estate is becoming surplus to requirements and the potential exists for further employment and/or residential development on this land. The adopted Doncaster Unitary Development Plan (1998) allocated part of the Bankwood Lane Industrial Estate as an 'Employment Site' with the wider industrial estate identified as an 'Employment Policy Area'. The following representations relate to the continued use of our client's land at the industrial estate for employment purposes. A review of the Publication Draft Policies & Proposed Sites Consultation documents has been undertaken, following which we wish to make comments in respect of: - Policies 2, 4 and 5 of the Doncaster Publication Draft Policies & Proposed Sites Draft Policies (August 2019); and - Submission Policies Map.

Introduction letter explaining representation in relation to the continued use of our client's land at the industrial estate for employment and we wish to make comments in respect of: - Policies 2, 4 and 5 of the Doncaster Publication Draft Policies & Proposed Sites Draft Policies (August 2019); and - Submission Policies Map.

Response: Noted.
On behalf of our client, Teakwood Partners and Godwin Developments, please find enclosed representations to your consultation on the Doncaster Local Plan (DLP): Publication Draft Plan (Regulation 19). This letter comprises our formal comments to the consultation. We have also completed and enclosed the associated ‘Comments Forms’. Teakwood Partners and Godwin Developments have recently acquired and are looking to redevelop land at Watch House Lane (the “Site”) for residential uses, as shown in Figure 1 below. Pre-application discussions have been undertaken with Officers regarding the Site, who are supportive of its redevelopment for residential. (SEE EMAIL FOR Figure 1: Site and Surrounding Area)

Summary:
Introduction to representations made by Quod Limited, summarised elsewhere, in support of land at Watch House Lane, Doncaster.

Response:
Support welcome
In order to provide further information and/or clarification regarding the support for Policy 2 / 3 / 31. In order to provide further information and/or clarification on any of the points raised within the accompanying Representations Report and/or Delivery Statement in respect of Policy 4 and the allocation of Site 001: J6, M18, Thorne North for employment use and to directly address any comments that may be raised by objectors to the allocation.

The representation is supported by a number of documents and provides support for the allocation of land at Junction 6 of the M18 to the north of Thorne (site reference 001) for employment uses under Policy 4: Employment Allocations (Strategic Policy). A separate Delivery Statement has been prepared, and is attached to this email and Representations Document, which demonstrates that Site 001 is available for immediate development; is suitable for the development of employment uses as proposed by the allocation; and comprises a viable development site for which there is evident commercial interest and market demand. The site is therefore wholly deliverable in order to meet Doncaster’s objectively assessed employment needs in the forthcoming plan period in accordance with the requirements of national planning policy. The Representations Document and Delivery Statement are also supported by an indicative masterplan which shows how a mix of B8, B2 and B1c uses can be delivered on the site (see Appendix 2 to the Representations Document) The Representations Document also provides support for other strategic policies associated with the delivery and location of employment land across the Borough (Policies 2 and 3), and comments on a limited number of wider thematic policies (notably Policy 31). Specific reference is made to the tests of soundness as relevant throughout the response. As such the consultation response comprises the following documents, all of which are attached to this email: 1. Four separate response forms (in respect of policies 2, 3, 4 and 31); 2. A Representations Report (September 2019) - including the Delivery Statement and Illustrative Masterplan as appendices; and 3. A separate copy of the Delivery Statement (September 2019) and associated appendices. We respectfully request the opportunity to expand upon the comments made within these representations at the Examination in Public. I would be grateful if you could confirm receipt of the representation, and should you require any further information please do not hesitate to contact me. (SEE EMAIL FOR Appendices)

The representation is supported by a number of documents and provides support for the allocation of land at Junction 6 of the M18 to the north of Thorne.

Noted.
Comment:
2.1. The Government's core objectives as established through the 2018 National Planning Policy Framework (the 2019 Framework) are sustainable development and growth. Paragraph 11 of the Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The 2019 Framework sets out to boost significantly the supply of homes and that a sufficient amount and variety of land can come forward where it is needed. In terms of building a strong and competitive economy the 2019 Framework states that planning should help create the conditions in which businesses can invest, expand and adapt. The key focus throughout the 2019 Framework is to create the conditions for sustainable economic growth and deliver a wide choice of high quality homes. 2.2. In relation to Local Plan formulation, paragraphs 15 to 37 of the Framework states that Local Plans are the key to delivering sustainable development which reflects the vision and aspirations of the local community. The Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where. 2.3. In relation to the examination of Local Plans, paragraph 35 of the Framework sets out the tests of soundness and establishes that: 2.4. The Local Plan and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sounds. Plans are ‘sound’ if they are: Positively prepared - providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development. Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Framework. 2.5. This document therefore considers the content of the Doncaster Local Plan - Publication Version (2015-2035) on behalf of Strata in light of this planning policy context.

Summary:
Summarises and quotes from NPPF indicating that subsequent comments are made in light of this policy context.

Response:
Noted - general introductory comments
Comment Ref: C/Test of Soundness/0257/3/004

Name: Emma Garner

CUSREF: 0257
Date: 20/09/2019
Organisation: Sprotbrough and Cusworth Parish Council

Representing:

Comment Ref: C/Test of Soundness/0257/3/004

Attend Examination: Not Stated

Reason:

Area: Miscellaneous - Introductions

Policy: Tests of Soundness and national Green Belt Policy

Tests of Soundness:

Comment:

23. The National Planning Policy Framework (NPPF) advises that the Planning Authority should submit a plan for examination which it considers is "sound": namely that it is: "Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in this Framework." 24. The policies in the NPPF are very clear on the importance of the Green Belt, for example: "Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified." "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development." "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations."

Summary:
Summarises and quotes from NPPF that plans should be consistent with national policy and makes reference to national policy on exceptional circumstances for altering Green Belt boundaries based on having assessed all other reasonable options for meeting identified development needs.

Response:
Representation repeats the tests of soundness and national Green Belt policy; no response required
Comment:
I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

Summary:
I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

Response:
Offer to discuss comments further is noted.
Comment Ref: C/General Comments/03506/1/003

Name: Spawforth Associates

Organisation: Spawforth Associates

Date: 30/09/2019

Reason:

Tests of Soundness:

- Positively prepared
- Effective
- Justified
- Consistent with national

Comment:

3.1. H. Burtwistle & Son is concerned that the Doncaster Local Plan - Publication Plan is deficient in its content and the evidence base does not reflect national guidance. Test of Soundness 3.2. H. Burtwistle & Son considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X - Positively Prepared X - Effective X - Justified X - Consistency with National Policy

Justification 3.3. H. Burtwistle & Son is concerned that the draft Local Plan does not reflect the Framework (2019). H. Burtwistle & Son is concerned that the housing requirement does not reflect economic growth ambitions, the level of employment allocations, nor is it sufficient to meet the identified needs for affordable housing. Further H. Burtwistle & Son are concerned that there are insufficient housing allocations to meet the housing requirement. 3.4. H. Burtwistle & Son is concerned that there is a lack of up to date, available, and robust evidence base to accompany the Plan, particularly in respect of an up to date Housing Needs Assessment, whilst a 2019 update is referred to in the Plan, it is not yet publicly available, the Viability Evidence (May 2019), which requires further testing to support its conclusion, and specific evidence to justify key policies 3.5. H. Burtwistle & Son consider that the Policies in the Local Plan are not justified and does not provide an appropriate strategy. The Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 3.6. In these circumstances, H. Burtwistle & Son do not consider the Doncaster Local Plan, in its current form, to be sound. 3.7. However, H. Burtwistle & Son consider that the plan can be made sound subject to proposed changes as set out within the following sections of these representations. H. Burtwistle & Son will continue to work with the Council to develop appropriate modifications to the Local Plan.

Proposed Change 3.8. To overcome the objection and address soundness matters, the Council should: - Identify a higher housing requirement to meet economic and affordable housing ambitions and needs. - Identify sufficient supply of housing to meet the identified housing requirement. - Review and make available supporting evidence for the Plan as indicated in these representations. - Review and provide additional testing in the Whole Plan Viability Report; and - Respond to the evidence and provide increased flexibility in the Plan, refer to specific proposed changes under each policy.

Summary:

General 1. Housing requirement does not reflect the growth ambitions or the level of employment allocations. 2. Housing requirement does not meet the need for affordable housing. 3. Lack of an up to date housing needs assessment. 4. Local Plan in current form is not consistent with national Policy. Proposed changes: 1. Higher housing requirement 2. Review of supporting evidence 3. Additional 'whole plan viability report' required. 4. Increased flexibility.

Response:
Test of Soundness: Positively prepared  Effective Justified  Consistent with national
Policy: Miscellaneous - Summary

Comment:

3.1. H. Burtwistle & Son is concerned that the Doncaster Local Plan - Publication Plan is deficient in its content and the evidence base does not reflect national guidance. Test of Soundness: 3.2. H. Burtwistle & Son considers that the Doncaster Local Plan - Publication Version 2015-2035 is unsound. Which test of soundness are comments about? X  - Positively Prepared X  - Effective X  - Justified X  - Consistency with National Policy Justification 3.3. H. Burtwistle & Son is concerned that the draft Local Plan does not reflect the Framework (2019). H. Burtwistle & Son is concerned that the housing requirement does not reflect economic growth ambitions, the level of employment allocations, nor is it sufficient to meet the identified needs for affordable housing. Further H. Burtwistle & Son are concerned that there are insufficient housing allocations to meet the housing requirement. 3.4. H. Burtwistle & Son is concerned that there is a lack of up to date, available, and robust evidence base to accompany the Plan, particularly in respect of an up to date Housing Needs Assessment, whilst a 2019 update is referred to in the Plan, it is not yet publically available, the Viability Evidence (May 2019), which requires further testing to support its conclusion, and specific evidence to justify key policies. 3.5. H. Burtwistle & Son consider that the Policies in the Local Plan are not justified and does not provide an appropriate strategy. The Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. 3.6. In these circumstances, H. Burtwistle & Son do not consider the Doncaster Local Plan, in its current form, to be sound.
3.7. However, H. Burtwistle & Son consider that the plan can be made sound subject to proposed changes as set out within the following sections of these representations. H. Burtwistle & Son will continue to work with the Council to develop appropriate modifications to the Local Plan. Proposed Change 3.8. To overcome the objection and address soundness matters, the Council should: - Identify a higher housing requirement to meet economic and affordable housing ambitions and needs. - Identify sufficient supply of housing to meet the identified housing requirement. - Review and make available supporting evidence for the Plan as indicated in these representations. - Review and provide additional testing in the Whole Plan Viability Report; and - Respond to the evidence and provide increased flexibility in the Plan, refer to specific proposed changes under each policy.

Summary:

H Burtwistle & Son is concerned that the draft Local Plan does not reflect the NPPF (2019) and the housing requirement does not reflect economic growth ambitions, the level of employment allocations, nor is it sufficient to meet the identified needs for affordable housing. There are insufficient housing allocations to meet the housing requirement. There is a lack of up to date, available, and robust evidence base to accompany the Plan, particularly an up to date Housing Needs Assessment (whilst a 2019 update is referred to in the Plan, it is not yet publically available) the Viability Evidence (May 2019) (which requires further testing to support its conclusion) and specific evidence to justify key policies. Consider that the Policies in the Local Plan are not justified and do not provide an appropriate strategy. The Plan could fail to deliver sustainable development and is not consistent with national policy. Do not consider the Doncaster Local Plan, in its current form, to be sound. However, consider the plan can be made sound subject to proposed changes as set out within the following sections. To overcome the objection and address soundness matters, the Council should: - Identify a higher housing requirement to meet economic and affordable housing ambitions and needs. - Identify sufficient supply of housing to meet the identified housing requirement. - Review and make available supporting evidence for the plan as indicated in these representations. - Review and provide additional testing in the Whole Plan Viability Report; and - Respond to the evidence and provide increased flexibility in the Plan, refer to specific proposed changes under each policy.
Comment Ref: C/Summary/04288/1/016

Name: Turley

Organisation: Turley

Representing: Peel Land and Property Management Limited

Attend Examination: Attend Hearing

Reason: In order to explain further the rationale behind the suggested changes and be given the opportunity to respond to any changes the Council propose to make and any further evidence that is presented.

Area: Miscellaneous - Summary

Policy: Miscellaneous

Tests of Soundness: 

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Comment:

10.1 Peel welcomes the opportunity to comment on the draft policies of the Doncaster Local Plan which includes consideration for the proposed expansion of DSA and its surroundings. 10.2 Peel generally supports the Doncaster LP and in particular draft spatial policy 7 which supports the growth and expansion of DSA. However some modifications are considered necessary to be made to this policy, and a number of other policies, to make the Local Plan sound. 10.3 Peel would welcome the opportunity to discuss these representations with the Council with a view to agreeing suitable revisions.

Summary:

Generally supports the Local Plan and Policy 7 in particular which supports the growth and expansion of DSA, but some modifications are necessary to make the policy and others sound. Welcome the opportunity to discuss these reps with the Council and agree revisions.

Response:

Conclusion type comments - specific detailed aspects of the Representation will be picked up through the previous parts of this summary/response document.
Comment:
2.7 A brief summary of our comments on the Draft Policies are as follows: - Missing evidence in Topic Papers that will not be available until Submission stage. - Lack of explanation of the settlement strategy in Policy 2. - The combined Service Town and Larger Village of Auckley - Hayfield Green is not justified. - Auckley should be identified as a standalone Larger Village within the Service Towns and Larger Village settlement hierarchy tier. - Concerns with the 920 pa Housing Requirement (Policy 3). - We object to the Local Plan only allocating sites for 15 years rather than the whole plan period. - The distribution of growth is not adequately explained or justified within the Local Plan text. There are concerns with the baseline distribution based on existing percentage of households in each settlement; and the lack of distribution of any economic uplift to the Service Towns and Larger Villages. - Exceptional circumstances for the release of Green Belt are inadequate. - Lack of analysis in the Sustainability Appraisal for minimising Green Belt release. - Not all reasonable alternatives have been considered - Airport focus to sustainable settlements e.g. Auckley - The SA Preferred Option 4 doesn't align with the Policy 3 housing target distribution. - The proposed distribution of housing growth differs from the Policy 3 housing distribution, neither of which have been subject to SA. - Concern over deliverability of over 11,600 dwellings via existing permissions. A non-implementation buffer is required. - Additional housing land should be identified to allow for a buffer, under delivery over the plan period and market choice. - Further information is required in relation to the justification for a number of policy requirements - Policy 67 Development Viability - concerns with viability reassessment once development commences / trigger points. Uncertainty for developers / landowners.

Summary:
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Response:
2.7 A brief summary of our comments on the Draft Policies are as follows: - Missing evidence in Topic Papers that will not be available until Submission stage. - Lack of explanation of the settlement strategy in Policy 2. - Concerns with the 920 pa Housing Requirement (Policy 3). - We object to the Local Plan only allocating sites for 15 years rather than the whole plan period. - The distribution of growth is not adequately explained or justified within the Local Plan text. There are concerns with the baseline distribution based on existing percentage of households in each settlement; and the lack of distribution of any economic uplift to the Service Towns and Larger Villages. - Exceptional circumstances for the release of Green Belt are inadequate. - The SA Preferred Option 4 doesn't align with the Policy 3 housing target distribution. - The proposed distribution of housing growth differs from the Policy 3 housing distribution, neither of which have been subject to SA. - Concern over deliverability of over 11,600 dwellings via existing permissions. A non-implementation buffer is required. - Additional housing land should be identified to allow for a buffer, under delivery over the plan period and market choice. - Further information is required in relation to the justification for a number of policy requirements - Policy 67 Development Viability - concerns with viability reassessment once development commences / trigger points. Uncertainty for developers / landowners.
Comment Ref: C/Form - Summary/04960/1/001

Name: Johnson Mowat

CUSREF: 04960

Date: 30/09/2019

Organisation: Johnson Mowat

Representing:

Comment Ref: C/Form - Summary/04960/1/001

Attend Examination: Attend Hearing

Reason: To allow participation in discussions regarding the proposed housing requirement and distribution of development including site selection and allocations.

Area: Miscellaneous - Summary

Policy:

Tests of Soundness: Positively prepared

Justified

Effective

Consistent with national

Comment:

Please see attached Statement which provides a full explanation of Mr and Mrs Hall’s objection to the Local Plan Publication Draft and promotes land off Spring Lane, Sprotbrough. PROPOSED CHANGE Please see attached Statement which provides a full explanation for the suggested changes. In summary it is considered a reasonable alternative strategy to allocate Site 252 off Spring Lane in Sprotbrough for housing, either in addition to or instead of Site 929.

Summary:

Please see attached Statement which provides a full explanation of Mr and Mrs Hall’s objection to the Local Plan Publication Draft and promotes land off Spring Lane, Sprotbrough as well as suggested changes. In summary it is considered a reasonable alternative strategy to allocate Site 252 off Spring Lane in Sprotbrough for housing, either in addition to or instead of Site 929.

Response:
In summary, the Draft Plan is not considered to be positively prepared, justified, effective or consistent with national policy. We therefore consider that the Draft Plan is considered to be 'unsound' in this context. We have grave concerns with the inconsistency of the site selection process and the conclusions that have been drawn in discounting the potential development sites. We remain concerned with the proposed levels of growth for both housing and employment and would encourage the Council to plan more positively in this respect. It is acknowledged that the Local Plan should plan for additional growth to ensure that sufficient available and deliverable land is allocated to meet the new stricter tests imposed by national policy. As previously stated, we have no objection to the broad locations of development however, sufficient, deliverable sites need to be allocated within each settlement to ensure the housing and employment land requirements are met across the Borough across the Plan Period. We are hopeful that DMBC will now utilise this representation in the spirit of proper plan making and adopt the recommendations within, which will help to make the Plan Sound in accordance with the requirements of the upcoming Examination in Public and the associated assessment by the appointed Independent Planning Inspector. The Council are encouraged to revisit the proposed draft allocations in terms of their opportunities and constraints focussing on those sites which are deliverable. Consideration should be given to the infrastructure that is in place as well the wider spatial strategy, given the inaccuracies contained within the HELAA and SAM, particularly with regard to discounting Site 149 on flood risk grounds; and the implication on the site not being appropriately considered for allocation in the emerging Local Plan. It is requested that the site's merits are reconsidered prior to the upcoming Local Plan Examination.
IGas Energy PLC (IGas) welcomes the opportunity to respond to the consultation on the Doncaster Local Plan Publication Version 2019 (the Plan). We note the publication of the Plan follows the consultation on the Draft Policies and Proposed Sites and on which IGas provided comments. IGas is concerned that Policy 65 - Providing for Energy Minerals, does not meet the requirements of the Government’s National Planning Policy Framework in that: o The Policy has not been positively prepared o Does not clearly distinguish between, and plan positively for, the three phases of development (exploration, appraisal and production), whilst ensuring appropriate monitoring and site restoration is provided for. o Does not make reference to all hydrocarbons.

Introduction
IGas is a British company listed on the Alternative Investment Market of the London Stock Exchange. It is a leading UK onshore oil and gas exploration and production company with a portfolio of assets in the north west, east Midlands and the Weald Basin in Southern England. Through the UK onshore licensing regime, IGas has made commitments to Government to explore whether hydrocarbons exist within the licence areas and establish if the UK has a viable onshore oil and gas resource. The UK is globally recognised as a leading example for oil and gas industry regulation. IGas has more than thirty years’ experience of successfully and safely extracting and producing hydrocarbons onshore in the UK working closely with local communities, regulators and MPAs. IGas is committed to the protection of the environment and communities and providing safe and healthy working conditions for its employees and contractors. It is also committed to maintaining close and responsive relationships with the communities in which it operates and has a long record of accomplishment of engaging with local residents. IGas has been operating its own voluntary Community Fund since 2008, which over the last decade, has distributed almost #1 million to local projects that are charitable, educational or benevolent in purpose. IGas holds a number of onshore UK licence interests in three regions many of which it both owns and operates: - North West: EXL273 and PEDLs 056, 145, 147, 184, 188, 189, 190, 193, 293 and 295. - East Midlands: AL009, EXL288, ML 3, 4, 6 and 7, PEDLs 006, 012, 139,140, 146, 169, 200, 210, 273, 278, 305, 316, 317 and 337 and PLs 162, 178, 179, 199 and 220. - Weald Basin: DL002 and 004, ML 18 and 21, PEDLs 021, 070, 235,257 and 326 and PLs 182, 205, 211, 233, 240 and 249. PEDL’s 139, 169, 273, 278, 305 and EXL288 fall within the emerging local plan boundary and extend into Nottinghamshire and Lincolnshire. IGas therefore has a particular interest in the preparation of the Plan. IGas is pleased to see the PEDLs have been included on the Policies map in accordance with Government guidance. IGas currently extracts oil and gas from 16 hydrocarbon fields and 80 production sites in the East Midlands, primarily in the Welton and Gainsborough areas. These areas account for c.50% of the company’s production, totalling more than 47 million barrels of oil to date. Current production is principally from “conventional” reservoirs, where the hydrocarbon is stored in porous geological formations and flows to the surface under its own pressure. This is distinct from “unconventional” reservoirs where hydrocarbons are stored in non-porous rocks and stimulation techniques are deployed to release the hydrocarbon. IGas is actively pursuing interest in unconventional reservoirs within the licences it holds through the carrying out of surveys and investigatory drilling.

Summary
IGas supports the vision and objectives of the Plan for future development and is of the view that onshore oil and gas could make a significant contribution towards achieving sustainable development by the efficient use of natural mineral resources and which would contribute to the economy. IGas is concerned that Policy 65 - Providing for Energy Minerals, does not meet the requirements of the Government's National Planning Policy Framework in that: The Policy has not been positively prepared Does not clearly distinguish between, and plan positively for, the three phases of development (exploration, appraisal and production), whilst ensuring appropriate monitoring and site restoration is provided for. o Does not make reference to all hydrocarbons. The supporting explanation to Policy 65 does not reflect the requirements of the Town and Country Planning (Environmental Impact Assessment Regulations) 2017 and does not set out the roles of other regulators. The definitions for hydrocarbons set out in the Glossary should reflect those provided by the Oil and Gas Authority.

Response:
Comment noted
The Local Plan is unsound. This is because there are several issues with Green Belt boundaries, Employment allocations and structure of Local Plan. Please refer to accompanying representation document for details. PROPOSED CHANGE - Inclusion of a site-specific policy for iPort. (please refer to part 5 of the submitted representation document) - Amendment of Greenbelt boundary to exclude iPort and immediate land to the North East of the site. (please refer to part 4 of the submitted representation document) - Amendment of Policies 4 and 5 of the Local Plan, in order to include a section on employment land being phased. (please refer to part 3 of the submitted representation document) - Removal of some of the employment sites featured in Policies 4 and 5 of the Local Plan, as well as the Policies Map, or introduction of an appropriate phasing policy. (please refer to part 2 of the submitted representation document)
51. Harworth Group therefore contends that a clearly preferable alternative option to that proposed at Conibrough & Denaby exists to meet local housing need, support local jobs and economic growth, protect biodiversity and open space for recreation whilst defining an appropriate new boundary between the settlement and surrounding Green Belt. 52. This alternative option would comprise of the following elements and associated changes to the Policies Map: 53. Site 1035 to be removed from Green Belt and allocated for employment (in part - 4.2 ha) and housing development (in part - 7.3 ha) with the settlement boundary adjusted to suit. Development of this site would deliver c.7,000 sqm of employment space and up to approximately 200 houses. This would contribute significantly to meeting the requirement of 262 dwellings to meet local housing need. 54. Site 383 (in its current form) to be deallocated for housing and instead designated as Green Belt; open space, sports and recreation; and as a local wildlife site. 55. Site 040 (in its current form) to be omitted as a housing allocation and retained as Green Belt. 56. To fully meet local housing need, the Council should consider identifying further land at Conisbrough & Denaby for housing which may be in the form of a reduced extent of site 040 or 383 (i.e. that preserves the biodiversity/amenity function and limits green belt incursion) or other suitable site. 57. Accordingly, Table H2(D) of the Publication Version Local Plan should be amended as follows: (SITE 040 AND 383 SHOWN AS STRIKE THROUGH BUT CANNOT BE SHOWN) Site Ref: 1035 Address: Land off Hill Top Road, Denaby Main Site Area (Ha): 7.3 Indicative Capacity (No of houses): 200 Achievability (deliverable & developable) - 0-5 Yrs: 0 5-10 Yrs: 200 11-15 Yrs: 0 15-17 Yrs: 0 Beyond Plan Period: 0 Site Ref: Address: [Reduced extent of site 040 or 383 or other suitable site] Site Area (Ha): Indicative Capacity (No of houses): 125 Achievability (deliverable & developable) - 0-5 Yrs: 0 5-10 Yrs: 0 11-15 Yrs: 125 15-17 Yrs: 0 Beyond Plan Period: 0 TOTALS: Indicative Capacity (No of houses): 325 Achievability (deliverable & developable) - 0-5 Yrs: 0 5-10 Yrs: 200 11-15 Yrs: 125 15-17 Yrs: 0 Beyond Plan Period: 0 58. To assist in meeting economic growth aspirations, supporting the Main Towns and the west of the borough, employment land should be allocated at Conisbrough & Denaby by amendment to Table 4 of the Publication Version Local Plan as follows: Table 4: Employment Site Allocations Location: Employment - Light Industry & Manufacturing: As Doncaster Main Urban Area. Locations within and accessible to the existing town Unity (Hatfield Power Park and associated business parks) Table 4 (as referenced from Policy 4) should be amended to include the allocation of land at Conisbrough & Denaby for employment development as follows: Table 4: Employment Site Allocations Ref: 001 Address/ Location: Junction 6 M18, Thorne North Gross site area (Ha): 73.63 Area available for employment use (ha): 73.63 Ha to be developed in plan period: 51.54 Ref: 092 Address/ Location: Balby Carr Gross site area (Ha): 11.25 Area available for employment use (ha): 11.25 Ha to be developed in plan period: 8.60 Ref: 258 Address/ Location: Site 1, Middle Bank, Balby Gross site area (Ha): 8.48 Area available for employment use (ha): 5.00 Ha to be developed in plan period: 5.00 Ref: 441 Address/ Location: Land at Carcroft Common, Carcroft Gross site area (Ha): 49.28 Area available for employment use (ha): 24.64 Ha to be developed in plan period: 12.32 Ref: 941 Address/ Location: RHADS Site 1, Phase 4 Business Park Gross site area (Ha): 68.54 Area available for employment use (ha): 68.54 Ha to be developed in plan period: 68.54 Ref: 1032 Address/ Location: Bankwood Lane, Rossington Gross site area (Ha): 17.68 Area available for employment use (ha): 17.68 Ha to be developed in plan period: 17.68 Ref: 1035 Address/ Location: Land at Eland Road, Denaby Main Gross site area (Ha): 4.2 Area available for employment use (ha): 4.2 Ha to be developed in plan period: 4.2 [Plus other sites as appropriate]

Summary:
- Site 1035 to be removed from Greenbelt and allocated for Housing.
- Remove other allocated sites (383/040)
- Identify more land for housing at Conisbrough and Denaby.

Response:
5.38 It is considered that the allocation of sites adjoining the existing Employment policy area, Broomhouse Lane Industrial Area will provide flexibility to the main existing occupier, Polypipe. 5.39 Polypipe are a main employer in the local area and wider borough that are important to the economy and provide significant wider social benefits to the communities in which they operate. 5.40 The UDP included a large area of land, site ref 646 that would have enabled expansion but this is now allocated for housing with planning permission. With the exception of site 743, no additional employment sites have been allocated in Edlington or the wider areas in the west of the Borough. 5.41 Polypipe is a national company that provides significant economic and social benefits to Edlington and the wider borough particularly the western areas. The company is significantly constrained on its existing site as a result of the loss of the expansion area to the east. It is therefore necessary to allocated the proposed sites to provide additional areas for the expansion of the company to ensure its efficient operation and growth in the future. 5.42 The delivery of the additional employment areas in this location to support the growth of an existing business and maintain Edlington and the main towns of Mexborough and Consibrough as sustainable, inclusive communities and would ensure the plan is justified and effective in delivering the vision and strategy set out in the Plan.

Summary:
Summary to be found on pages 20 to 21 of the DLP representation on behalf of Polypipe. Allocating the sites will provide flexibility for the employer Polypipe (a national company) provides important economic and social benefits UDP included a large area of land, site ref 646 that would have enabled expansion but this is now allocated for housing with planning permission No additional employment sites have been allocated in Edlington Current location constrained. the two sites should be allocated to allow for expansion Delivery of the additional employment areas in this location to support the growth of an existing business and maintain Edlington and the main towns of Mexborough and Consibrough
3.1 Overall, we support the focus of development in the most sustainable locations and within the Main Urban Areas of Doncaster and with the new approach to development in the countryside (Draft Policy 2), bringing it in line with the new NPPF. 3.2 We do however have fundamental concerns over DMBC's draft strategic approach. 3.3 Our principal comments relate to the district's LHN figure (draft Policy 3). We have concerns over the developability of certain sites and failure to adequately sufficiently allocate the most deliverable housing sites within the Main Urban Area of Doncaster (draft policy 6 and as outlined in tables H1-3, chapter 16). 3.4 We have also provided comments on Draft Policy 1 (Presumption in Favour of Sustainable Development) in terms of Neighbourhood Planning, Draft Policy 8 (Delivering the Necessary Range of Housing), and Draft Policy 14 (Promoting Sustainable Transport in New Developments). 3.5 We therefore wish to make the following points in the interests of assisting DMBC with a sound Local Plan.

Summary:
Support focus of developing in the most sustainable locations in the urban area and the new countryside approach, but have concerns about strategic approach. Wish to make following points to assist in a sound plan.

Response:
Noted - introductory comments with the detail being picked up through the various parts of the local plan the Representation refers to elsewhere in this summary/response document.
DLP Planning have made representations on behalf of 360 Degrees Media for the allocation of land at the Former Doncaster College, High Melton to be allocated as a Special Policy Area to better reflect its brownfield nature and to support the development of this site for creative media industries, or at least to be designated as Major Developed Site in the Green Belt. The future development proposals for this site have been subject to discussion with Doncaster MBC and Sheffield City Region and are supported by these two bodies. The proposed development will have significant positive economic and skills benefit to the Borough and City Region, making the best use of previously developed land and securing the long term future of heritage assets located on the site.

Summary:
Re former High Melton College site. Should be allocated as a Special Policy Area to better reflect its brownfield nature and to support the development of this site for creative media industries, or at least to be designated as Major Developed Site in the Green Belt. The future development proposals for this site have been subject to discussion with Doncaster MBC and Sheffield City Region and are supported by these two bodies. The proposed development will have significant positive economic and skills benefit to the Borough and City Region, making the best use of previously developed land and securing the long term future of heritage assets located on the site.

Response:
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Summary:

the allocation of sites adjoining the existing Employment policy area, will provide flexibility to the main existing occupier Polypipe are a main employer in the local area. UDP included a large area of land, site ref 646 that would have enabled expansion but this is now allocated for housing with planning permission. Polypipe is a national company that provides significant economic and social benefits to Edlington and the wider borough particularly the western areas. The company is significantly constrained on its existing site as a result of the loss of the expansion area to the east should allocate the proposed sites to provide additional areas for the expansion of the company to ensure its efficient operation and growth in the future delivery of the additional employment areas in this location to support the growth of an existing business
### Summary:

Recommendations for the publication draft are as follows, in the interests of effective, justified, consistent and positive plan making:

1. **Recommendation 1**: Doncaster should continue to strive for economic, social and environmental sustainability as well as provide further details on the relationship between the Local Plan and Neighbourhood Plan in the interests of consistency with national policy and justified plan making.

2. **Recommendation 2**: Ensure that a sustainable growth strategy is incorporated to guarantee consistency with DMBC's aims and objectives and the NPPF in the interests of positive plan making. The plan should however ensure that all housing allocations are the most deliverable and can contribute to the supply of housing over the plan period in the interests of effective and justified plan making.

3. **Recommendation 3**: Ensure that a positive growth strategy is incorporated into the LHN to ensure consistency with DMBC's aims and objectives and the SCR growth strategy. In order to achieve this DMBC should adopt a housing target of at least 1,073 dwellings per annum in the interests of positive, consistent and effective plan making.

4. **Recommendation 4**: Ensure that the shortfall of 3,195 units from the previous plan period is accounted for within the new housing target. In the interests of justified and effective plan making.

5. **Recommendation 5**: DMBC should heighten the role of Doncaster within its growth distribution, planning for at least 17,262 dwellings over the plan period within or adjacent to the Main Urban Area in line with Recommendations 2 and 3 and in the interests of effective, justified and positive planning.

6. **Recommendation 6**: DMBC should allocate more land for housing given an overall shortfall within the Main Urban Area of -9,817 plots. In the interests of a positive, justified and effective plan.

7. **Recommendation 7**: DMBC should review its housing need so to provide an up to date assessment to make sure the evidence is up to date in the interests of justified and effective plan making.

8. **Recommendation 8**: Ensure that sustainable transport is incorporated into the design of developments in the interests of effective and positive planning.

For more information please refer to comments in attached report.

### Response:

Noted - these recommendations are a summary of the Representation's proposed changes which will be picked up through the various detailed responses elsewhere in this summary/response document.

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Comment:
Gladman welcome the opportunity to comment on the Publication Version of the Doncaster Local Plan consultation. Having considered the Publication Version of the Local Plan for Doncaster, Gladman are concerned about a range of matters and reiterate many of the same points made on the draft version of the Plan. Blanket policies that seek to unduly restrict development opportunities should be avoided and, where possible, policies should include the provisions necessary for flexibility that allow an NPPF-compliant assessment of the benefits and harm that would arise from a development proposal. The Plan must be positively prepared, effective, justified and consistent with national policy to be found sound at examination. The Council should explore all sources of supply in order to maximise the delivery of its assessed housing need. It is hoped that comments made within this representation are of value to the Council in the preparation of the Local Plan.

Summary:
Concluding statement referring to representations summarised elsewhere.

Response:
Conclusion type comments to the Representation; no response needed
### Comment:

4.1 This Local Plan Representation has been prepared by DLP Planning Ltd on behalf of Mr James Ogley in response to the publication of the Doncaster Local Plan (Regulation 19) for consultation. 4.2 This representation supports the removal of site ref. 040 from the Green Belt and its allocation for housing in the publication version of the Local Plan is supported, and it is considered that the allocation is essential in helping to deliver the spatial strategy for the Borough. The suitability, availability and deliverability of the site is confirmed in this representation. 4.3 This representation objects to the current wording of Policies 6, 27, 29, 30 and 66, and of Appendix 2, and makes a number of recommendations for amendments to ensure the soundness of the Plan.

### Summary:

Site 040 is supported and its suitability confirmed. Objections have been raised to policies 6, 27, 29, 30 and 66, and Appendix 2, and recommendations are made to ensure plan soundness.

### Response:
Comment: 4.1 This Local Plan objection has been prepared by DLP Planning Ltd on behalf of Mr Ian Brealey in response to the publication of the Doncaster Local Plan (Regulation 19) for consultation. 4.2 The suitability, availability and deliverability of the site is confirmed in this representation. 4.3 This representation objects to the current wording of Policies 2, 3, 27, 29, 30 and 66, as well as the lack of considering reasonable alternatives in the Sustainability Assessment and makes a number of recommendations for amendments to ensure the soundness of the Plan.

Summary:
This objection confirms that Brodsworth Quarry is suitable, available and deliverable. We object to the current wording of Policies 2, 3, 27, 29, 30 and 66, as well as the lack of considering reasonable alternatives in the Sustainability Assessment. We make a number of recommendations for amendments to ensure the soundness of the Plan.

Response:
This representation is submitted on behalf of Bellway Homes (Yorkshire) and Mr D Higgins in response to consultation on Doncaster Council’s Draft Policies & Proposed Sites (2018). This representation relates specifically to the promotion of Site 189 Higgins Agriculture Ltd, Old Bawtry Road, Finningley for Housing allocation. 4.2 This representation follows on from previous representations made to Local Plan consultation between 2012 and 2018. 4.3 Section 2 of this representation considers the strategic approach to housing and employment delivery within the Publication Local Plan. Our representations demonstrate that the overall housing requirement is above that currently planned for and should be distributed in a more flexible manner, in order to ensure that the economic growth objectives of the plan are fully supported, as well as meeting local housing need. 4.4 Within this context, the representation objects to the current wording of Policies 3, 6, 7, 27, 29, 30 and 66, and of Appendix 2, and makes a number of recommendations for amendments to ensure the soundness of the Plan. 4.5 Section 3 provides a detailed individual site-specific assessment of the Higgin’s Site in order to demonstrate the suitability and deliverability of the site for housing development. Such development will complement the growth of the Airport and its hinterland. 4.6 The site has previously been considered for housing within the Council’s HELAA document and assessed as being a suitable, achievable and deliverable in order to accommodate further housing growth. 4.7 Therefore, it is recommended that the site should be allocated for housing in order to provide housing including affordable housing, within a sustainable location, which can make a viable contribution to the vitality and sustainability of the village, in accordance with the aspirations of the Framework.

The representation objects to the current wording of Policies 3, 6, 7, 27, 29, 30 and 66, and of Appendix 2, and makes a number of recommendations for amendments to ensure the soundness of the Plan. Section 3 provides a detailed individual site-specific assessment of the Higgin’s Site to demonstrate a suitable and deliverable site. HELAA document assessed the site as being a suitable, achievable and deliverable for housing. Consultants recommend that the site should be allocated for housing, including affordable housing, within a sustainable location, which can make a viable contribution to the vitality and sustainability of the village, in accordance with the aspirations of the Framework. There are a number of tables, figures and appendices within the representation that will require referencing and consideration alongside the comments within the database. These include ten year housing supply, spatial distribution based on employment led housing need, site specific survey requirements, building description, highways scoping appendices.
Comment:

Our client's interest is in respect of the settlements of 'Warmsworth' and 'Clayton'. Our comments therefore focus on these settlements and the associated draft policies. We support the presumption of sustainable development as set out in Policy 1 and that Doncaster's Spatial Strategy will focus on delivering sustainable growth in settlements in accordance with the identified Settlement Hierarchy (Policy 2). However, we do request that the prescriptive restrictions on infill sites and development limits are amended within Policy 2 and that settlements, such as Clayton, should be considered with regard to the current restrictive development boundaries (e.g. existing settlement limits and Green Belt), to ensure that the village can accommodate appropriate future growth to continue to support the existing community and associated local services and facilities. Additionally, the housing figures identified in Policy 3 are very much a minimum target, and not a cap to future growth / development up to 2035. With regard to housing allocations, there are three sites at Warmsworth that are within our client's ownership that are considered suitable for future residential development. The sites are known as: - "West Farm Fields between High Road and Low Road West, Warmsworth"; - "Mill Lane, Warmsworth"; and, - "Common Lane, Warmsworth". It is considered that the above three sites would provide suitable and deliverable residential development sites within the Main Area of Doncaster to help meet the housing needs of the Borough over the emerging Plan period. Furthermore, to protect the future development opportunities post plan period, it is considered that an alternative option is to safeguard land to ensure that the revisions to the Green Belt boundary are long lasting and do not require further amendments post plan period (e.g. future-proof the revised boundaries - identifying land for development beyond the Plan period). For example, paragraph 139 of the NPPF states that when defining Green Belt boundaries, plans should "where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period". We therefore support the proposal to safeguard land for future development also. There are also concerns regarding the overly onerous policy criteria set out in Policy 26 and 28 as the proposed restrictions are not considered to be in accordance with the 2018 NPPF. Amendments are therefore proposed to Policy 26 and 28. Finally, there are also strong concerns over a proposed Local Green Space in Warmsworth that is on land within our client's ownership. In conclusion, it is considered that further consideration needs to be given to the draft policies along with greater consideration to the proposed housing allocations and a Local Green Space allocation. We therefore respectfully request that the Council reconsider the proposed Housing Allocations; particularly in respect of land at Warmsworth, and to allocate our client's land for residential development to meet the identified housing need for the Borough.

Summary:

Concluding summary of comments made to various parts of the Local Plan summarised elsewhere (not included here to avoid repetition).

Response:
Our client's interest is in respect of the settlements of ‘Warmsworth’ and ‘Clayton’. Our comments therefore focus on these settlements and the associated draft policies. We support the presumption of sustainable development as set out in Policy 1 and that Doncaster’s Spatial Strategy will focus on delivering sustainable growth in settlements in accordance with the identified Settlement Hierarchy (Policy 2). However, we do request that the prescriptive restrictions on infill sites and development limits are amended within Policy 2 and that settlements, such as Clayton, should be considered with regard to the current restrictive development boundaries (e.g. existing settlement limits and Green Belt), to ensure that the village can accommodate appropriate future growth to continue to support the existing community and associated local services and facilities. Additionally, the housing figures identified in Policy 3 are very much a minimum target, and not a cap to future growth / development up to 2035. With regard to housing allocations, there are three sites at Warmsworth that are within our client's ownership that are considered suitable for future residential development. The sites are known as: - "West Farm Fields between High Road and Low Road West, Warmsworth"; - "Mill Lane, Warmsworth"; and, - "Common Lane, Warmsworth". It is considered that the above three sites would provide suitable and deliverable residential development sites within the Main Area of Doncaster to help meet the housing needs of the Borough over the emerging Plan period. Furthermore, to protect the future development opportunities post plan period, it is considered that an alternative option is to safeguard land to ensure that the revisions to the Green Belt boundary are long lasting and do not require further amendments post plan period (e.g. future-proof the revised boundaries - identifying land for development beyond the Plan period). For example, paragraph 139 of the NPPF states that when defining Green Belt boundaries, plans should "where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period". We therefore support the proposal to safeguard land for future development also. There are also concerns regarding the overly onerous policy criteria set out in Policy 26 and 28 as the proposed restrictions are not considered to be in accordance with the 2018 NPPF. Amendments are therefore proposed to Policy 26 and 28. Finally, there are also strong concerns over a proposed Local Green Space in Warmsworth that is on land within our client's ownership. In conclusion, it is considered that further consideration needs to be given to the draft policies along with greater consideration to the proposed housing allocations and a Local Green Space allocation. We therefore respectfully request that the Council reconsider the proposed Housing Allocations; particularly in respect of land at Warmsworth, and to allocate our client's land for residential development to meet the identified housing need for the Borough.
Comment:

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Summary:

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Response:
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4.1 These representations have been prepared on behalf of our Client, Barratt and David Wilson Homes (Yorkshire East), who are an interested stakeholder in the borough, with land interests in Bawtry. 4.2 Whilst our Client welcomes the Council’s proposals to prepare a new Local Plan, they have a number of concerns regarding the content of the publication document. A number of these issues relate to the soundness of the Plan and there are concerns that the tests of paragraph 35 of the Revised National Planning Policy Framework will not be met as currently written. Our Client’s comments on Development Management policies are provided with the intention of helping to speed up the decision-making process, and to remove any unnecessary complications. This is to help to ensure the speedy delivery of much needed housing within the borough. 4.3 The principal concerns in terms of the policies as drafted within the publication version of the Plan are the proposed housing figure which the Council have identified as their housing requirement for the plan period. The evidence base which underpins this figure is considered to be flawed and there is an overreliance on the reintroduction of empty homes as well as a disproportionate distribution of housing to the top tiers of the settlement hierarchy. For example, the surplus of housing that is diverted away from villages without a sufficient service function should be distributed evenly across all six tiers of the settlement hierarchy, not just the top two. 4.4 The general Council’s approach to the distribution of housing through the borough is concerning, as they are seeking to deliver 90% of all housing in the main urban area and the main towns, with just 10% of housing in the service towns and villages. There are deliverability issues within the area, which has been demonstrated by the fact the Council have been unable to demonstrate a five-year housing land supply and despite this, the Council are carrying forward the same approach to distribution as is within the adopted Core Strategy. This is unacceptable, and the Council have to propose housing in areas where it can be delivered. Our Client strongly objects to the distribution as currently proposed, and a more even spread through the district should be brought forward. 4.5 Our Client supports Green Belt release in order to meet the housing requirement. Our Client supports Green belt release in order to meet housing requirements and objects to the exclusion of their land interests at Tickhill Road, Bawtry (site ref: 146). The sole reason it has been dismissed is because it scores poorly as part of the Green Belt Review. We have demonstrated within these representations that the Green Belt Review is flawed and the site has been unfairly assessed based on the fact it forms part of a wider Green Belt Parcel that was assessed, rather than being assessed on an individual basis. 4.6 However, our Client does support the proposed allocation of their other site in Bawtry, site reference 141. 4.7 We welcome the opportunity to outline these in further written representations and also in verbal representations at the Examination in Public in the near future.

Summary:
Comments noted. All issues are covered in previous sections of the responses.

Response:
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Summary:
Comments noted. All points covered in previous comments.

Response:
IGas welcomes the opportunity to comment on the policies in the Plan. IGas supports the vision and objectives of the Plan for future development and is of the view that onshore oil and gas could make a significant contribution towards achieving sustainable development by the efficient use of natural mineral resources and which would contribute to the economy. However, IGas is concerned that Policy 65 - Providing for Energy Minerals does not reflect the requirements of the Government’s National Planning Policy Framework in that: IGas is concerned that Policy 65 - Providing for Energy Minerals does not reflect the requirements of the Government’s National Planning Policy Framework in that the Policy has not been positively prepared, does not clearly distinguish between, and plan positively for, the three phases of development (exploration, appraisal and production), whilst ensuring appropriate monitoring and site restoration is provided for and does not make reference to all hydrocarbons. It is considered that the supporting explanation to Policy 65 should reflect the requirements of the Town and Country Planning (Environmental Impact Assessment Regulations) 2017 and should set out the roles of other regulators. The definitions for hydrocarbons set out in the Glossary should reflect those provided by the Oil and Gas Authority. IGas maintains its suggestion that the Council may wish to refer to specific policies and supporting explanations relating to hydrocarbon developments in local plans prepared by other mineral planning authorities that have been through examination, found sound and subsequently adopted. IGas would welcome the opportunity to meet with the Council to assist in the development of the policies to the local plan, particularly in respect of hydrocarbons, to ensure they are consistent with national policy and planning guidance to make the plan sound. We look forward to the next stage of the process.

Summary:
Conclusion / summary provided

Response:
Comment note on conclusion. see individual policy representations for detail response
6.1 In order to achieve soundness in the Local Plan, DMBC, should approach Employment Land supply through a rational and sustainable approach. The Local Plan could utilize a practical scheme of phasing to deal with employment land; sites could be released gradually, in order to meet demand, avoiding excess supply of employment land. Overallocation of land is unsustainable in the long term, as land in Doncaster is a finite resource. By ensuring an aggregate supply of employment land is provided into the future for other uses besides B8, Doncaster is preparing for a diversified and adaptive local economy, which will include various uses, development and infrastructure. Ultimately, a Local Plan that designates employment sites in a hierarchical fashion, applying practicality alongside regional vision will promote sustainable development, and ensure schemes such as iPort are viable. Furthermore, RPS request that the inclusion of a site-specific policy focused on iPort. In order for iPort to be able to develop and remain viable, RPS recommend that the Green Belt boundary is redrawn and DMBC consider the changes highlighted above. 6.2 A site-specific policy would ensure that the development of the site was consistent with the principles that underpinned the granting of permission.

Summary:
Concludes that employment land should be released using a phased approach. Such an approach will ensure iPort is viable. Requests a site specific policy in respect to iPort. iPort should be taken out of the Green Belt.

Response:
Noted. There is no requirement for a phased approach as this would hinder the market. There is no need for a site specific policy as iPort benefits from planning permission. There is no requirement at this time for iPort to be taken out of the Green Belt.
Tests of Soundness:

Comment:

5.1 This representation is submitted on behalf of SYHA Enterprises Ltd and A.A Lund in response to consultation on the draft Doncaster Local Plan (Reg 19) 2019. This representation relates specifically to the promotion of Site 446: Mosham Road, Auckley for Mixed Use allocation. 5.2 Site 446 is retained within the Countryside Policy Area within the draft Local Plan. DLP objects strongly to this designation and to policies 3, 6, 7 and 8 for the reasons set out within this representation. 5.3 The site has been extensively promoted for redevelopment throughout the Local Plan preparation period. The housing led development of the site is supported in principle by Blaxton and Auckley Parish Councils, and by Peel Investments, as promoters of the DSA Masterplan. 5.4 Within this context, Section 3 of this representation provides detailed analysis of the spatial strategy set out within the draft Local plan, in order to demonstrate that the overall housing requirement is above that currently planned for and should be distributed in a more flexible manner, in order to ensure that the economic growth objectives of the plan are full supported, as well as meeting local housing need. The recommendations set out herein are proposed to ensure the soundness of the plan and ensure the most sustainable approach is taken to support the level of location of housing and employment growth sought within the Borough. 5.5 The wide ranging benefits of allocating Site 446 are set out in Section 4 of this representation and it is considered that this site can be comprehensively developed to deliver housing-led uses together with transport infrastructure relating to the proposed railway station, which will complement the growth of the Airport and its hinterland. 5.6 The sites inclusion for housing within the DSA masterplan reflects its under-utilised brownfield status and the sites suitability for development as a cleared level site with good accessibility, being in flood zone 1, with no environmental constraints. 5.7 The development of the sites will contribute towards facilitating the development of a new airport railway station, providing sustainable transport connections not only to the airport but also to settlements within the wider area. The site already benefits from a good public transport service serving Auckley village and is not therefore reliant on a critical mass of new development to secure new public transport links in order to ensure sustainability. 5.8 In respect of the consideration of other sites within Auckley for development, the site has been demonstrated to perform strongly against other sites identified within the Site Selection Methodology document. The site is also demonstrated to be a suitable, achievable and deliverable in order to accommodate further housing growth. 5.9 Therefore, it is recommended that the site should be allocated for housing in order to provide market and affordable housing, as well as other uses, in the short-medium term, within a sustainable location, which can make a viable contribution to the vitality and sustainability of the village in accordance with the aspirations of the Framework. 5.10 The landowners has a confirmed interest to purchase the land for development from SYHA Enterprises, who are committed to bringing the site forward for development in the short term. 5.11 The Local Plan as drafted is unsound because it does not meet the full housing requirement for the Local Plan period, as set out within this representation and is not therefore consistent with the Framework Paragraph 22, which requires strategic policies to cover a minimum 15 year period. 5.12 The resulting housing provision to meet future need is therefore considered unsound. It cannot be regarded as positively prepared, and is not justified by the evidence base for the Plan; nor can it be treated as consistent with national policy and support for the plan-led approach. 5.13 In order to address the overall failure of the plan to designate sufficient land for development, and to take the significant strategic opportunity presented by the proximity of the Auckley site to the airport and the location of the proposed railway station on the southern boundary of the site, we make a number of recommendations herein, including that Site 446 be removed from the current Open Countryside designation and re-allocated as a Housing site in order to contribute to the overall supply of such land within the Borough and assist in the regeneration of the locality.

Summary:

Re site 446 Auckley (rejected Housing site) 1. Site in Countryside Policy Area in Local Plan. 2. Wants site allocating for housing. 3. Says site is Brownfield. 4. Contests 'Woods' SA description of it being a Greenfield site. 5. Attached with the rep are copies of several legal cases and planning appeals that feature Brownfield land interpretation. 6. Allocation would minimise release of other Greenbelt sites. 7. Is needed to support regeneration in an area of growth opportunity. 8. Local Plan does not meet the full housing requirement for the plan period (not consistent with NPPF para 22. 9. Identified in Airport masterplan as an area for future housing growth.

Response:
This letter and enclosed forms set out our Teakwood Partners and Godwin Development’s representations to the Doncaster Local Plan: Publication Draft Plan (Regulation 19). In relation to the Site at Watch House Lane, Teakwood Partners and Godwin Development support its removal from the Employment Policy Area and re-designation into the Residential Policy Area given:

- The Site has been unsuccessfully marketed for a considerable period of time with no viable interest or market demand for the Site for employment purposes.
- The surrounding area is changing in nature from a mix of industrial and residential uses to primarily residential uses.
- The Site is suitable and can provide more appropriate uses such as residential.

However, in relation to the draft policies listed below, the DLP as currently drafted is not justified and unsound. To make the plan sound, the following amendments noted above are required:

- **Policy: Policy 8** Topic: Affordable Housing Requested Change: The DLP should warrant BtR specific recognition, whilst a specific policy approach for BtR should be provided, addressing how DC intents to address affordable housing for BtR schemes.

- **Policy: Policy 14** Topic: Car Parking Requested Change: Policy should be amended to confirm that all schemes, including those outside of the town centre, will be considered on a site by site basis, acknowledging that the minimum car parking standards may not be appropriate or necessary in some areas.

- **Policy: Policy 46** Topic: Housing Design Standards Requested Change: The Policy should be amended to reflect that a deviation to NDSS will be allowed, where the characteristics or circumstances of a development means it is appropriate to do so, specifically referencing BtR as a format where this is the case.

**Summary:**

Concluding comments of other representations made, not summarised here to avoid repetition.

**Response:**

Conclusions are noted.
In conclusion, FCC support the proposed allocations over their landholdings at Barnsdale Bar (Policy 62) and Bootham Lane (Policy 70) as illustrated on the Submissions Policies Map. In addition, FCC wish to safeguard the continuation of the Bootham Lane landfill operations as the Unity regeneration project develops.
Both Edenthorpe and Armthorpe provide a number of recommendations:

**Recommendation 6:** DMBC should allocate more land for housing given an overall shortfall within the Main Urban Area. The Main Urban Area is a key focus for growth and regeneration within the district. The site will create new, safe pedestrian and cycle links to the site itself is well connected and offers the potential to make a significant contribution to housing numbers in line with the Doncaster's Spatial Strategy and offers the potential to make a significant contribution to housing numbers. For these reasons we have over DMBC's current strategy to allocate sufficient developable housing sites within the Main Urban Area of Doncaster. The thrust of these representations is to share the significant concerns we have established a minimum target for the MUA of 17,262 dwellings against a supply of 7,445 dwellings based on our initial assessment this shows a current shortfall of -9,817 dwellings. It is therefore recommended that new sites should come forward which can clearly demonstrate developability and deliverability. The land at Grange Farm represents an opportunity to deliver essential growth adjacent to the Main Urban Area of Doncaster. Comments have also been made in relation to location of housing, housing mix, affordable housing and sustainable transport. We set out our recommendations on the Publication Draft Local Plan as follows, in the interests of effective, justified, consistent and positive plan making. Recommendation 1: Doncaster should continue to strive for sustainable development on the grounds of sustainability (economic, social and environmental) as well as provide further details on relationship between the Local Plan and Neighbourhood plan in the interests of consistency with national policy and justified plan making. - Recommendation 2: Ensure that a sustainable growth strategy is incorporated to guarantee consistency with DMBC's aims and objectives and the NPPF in the interests of positive plan making. The plan should however ensure that all housing allocations are the most deliverable and can contribute to the supply of housing over the plan period in the interests of effective and justified plan making. - Recommendation 3: Ensure that a positive growth strategy is incorporated into the LHN to ensure consistency with DMBC's economic aims and objectives and Sheffield City Region Growth Strategy. In order to achieve this DMBC should adopt a housing target of at least 1,073 dwellings per annum in the interests of positive, consistent and effective plan making. - Recommendation 4: Ensure that the shortfall of 3,195 units from the previous plan period is accounted for within the new housing target. In the interests of justified and effective plan making. - Recommendation 5: DMBC should heighten the role of Doncaster within its growth distribution, planning for at least 17,262 dwellings over the plan period within or adjacent to the Main Urban Area in line with Recommendations 2 and 3 and in the interests of effective, justified and positive planning. - Recommendation 6: DMBC should allocate more land for housing given an overall shortfall within the Main Urban Area of -9,817 plots. In the interests of a positive, justified and effective plan. - Recommendation 7: DMBC should review its housing need so to provide an up to date assessment to make sure the evidence is up to date in the interests of justified and effective plan making. - Recommendation 8: Ensure that sustainable transport is incorporated into the design of developments in the interests of effective and positive planning. As set out within the accompanying Vision Document Miller Homes are committed to delivering the Grange Farm scheme, providing an exceptional place-making opportunity across 11.2 ha of land with an ability to deliver 264 new homes for the district immediately, delivering public open space, improved walking and cycling facilities as well as access to the Armthorpe's public open spaces. The site is located adjoining the Main Urban Area of Doncaster, directly south of Edenthorpe and as such represents a Sustainable Urban Extension. Given the now reduced size of the site it would not impact on the neighbouring areas of Armthorpe and Edenthorpe from merging and would instead constitute a Sustainable Urban Extension. Initial analysis of the site's technical considerations demonstrates there are no insurmountable constraints to the development coming forward on the site therefore the site can be considered as deliverable and developable in the context of the definitions contained within the NPPF. The proposed residential use of the site meets the three strands of sustainable development (social, economic and environmental) as follows: - The Main Urban Area is a key focus for growth and regeneration within the district. - The site is situated close to a number of key bus routes and is also well connected in terms of walking and cycling. - The site will create new, safe pedestrian and cycle links to allow improved access to the green spaces within the area, including Shaw Wood SSSI. - Both Edenthorpe and Armthorpe provide a number of local amenities and facilities. Employment opportunities are also located within close proximity to the site. - The site itself is well connected and will build a critical mass of residents to help support and sustain the existing facilities and services of Armthorpe. - The development of the site offers the potential to make a significant contribution to housing numbers in line with the Doncaster’s Spatial Strategy and would help provide affordable housing and meet housing needs in a sustainable location. - The development of the site will contribute towards sustainable economic growth through direct construction employment and indirect employment and would create an increase in spending power arising from the additional population amongst other fiscal benefits. - The development would contribute to attracting an influx of people in to the area by offering a range of houses and would also assist in the urban regeneration of the area given the economics of the area. We consider the site to be a highly sustainable, deliverable and developable allocation which should be supported for residential development within the emerging DMBC Local Plan. We welcome the opportunity to maintain engagement in the preparation of the new Local Plan and would be happy to discuss any of the points raised within this report. We will also seek to meet with relevant Council officers during 2019 and beyond in the context of carrying out greater evidence base working on the site and supporting the council in delivering a sound Local Plan.
Summary:
Grange Farm is available for immediate development and can come forward in the next 5 years, delivering 264 dwellings to help supply in the urban area. There are concerns with DMBCs current strategy to allocate sufficient developable housing istes in the urban area. There is a calculated shortfall of 9,817 dwellings in this location in the plan. New sites must therefore come forward, such as Grange Farm. The recommendations are: - Recommendation 1: Doncaster should continue to strive for sustainable development on the grounds of sustainability (economic, social and environmental) as well as provide further details on relationship between the Local Plan and Neighbourhood plan in the interests of consistency with national policy and justified plan making. - Recommendation 2: Ensure that a sustainable growth strategy is incorporated to guarantee consistency with DMBC’s aims and objectives and the NPPF in the interests of positive plan making. The plan should however ensure that all housing allocations are the most deliverable and can contribute to the supply of housing over the plan period in the interests of effective and justified plan making. - Recommendation 3: Ensure that a positive growth strategy is incorporated into the LHN to ensure consistency with DMBC’s economic aims and objectives and Sheffield City Region Growth Strategy. In order to achieve this DMBC should adopt a housing target of at least 1,073 dwellings per annum in the interests of positive, consistent and effective plan making. - Recommendation 4: Ensure that the shortfall of 3,195 units from the previous plan period is accounted for within the new housing target. In the interests of justified and effective plan making. - Recommendation 5: DMBC should heighten the role of Doncaster within its growth distribution, planning for at least 17,262 dwellings over the plan period within or adjacent to the Main Urban Area in line with Recommendations 2 and 3 and in the interests of effective, justified and positive planning. - Recommendation 6: DMBC should allocate more land for housing given an overall shortfall within the Main Urban Area of -9,817 plots. In the interests of a positive, justified and effective plan. - Recommendation 7: DMBC should review its housing need so to provide an up to date assessment to make sure the evidence is up to date in the interests of justified and effective plan making. - Recommendation 8: Ensure that sustainable transport is incorporated into the design of developments in the interests of effective and positive planning. The site is a well located sustainable urban extension with god transport links and links to existing settlements and services. It meets the strands of sustainable development: - The Main Urban Area is a key focus for growth and regeneration within the district. - The site is situated close to a number of key bus routes and is also well connected in terms of walking and cycling. - The site will create new, safe pedestrian and cycle links to allow improved access to the green spaces within the area, including Shaw Wood SSSI. - Both Edenthorpe and Armthorpe provide a number of local amenities and facilities. Employment opportunities are also located within close proximity to the site. - The site itself is well connected and will build a critical mass of residents to help support and sustain the existing facilities and services of Armthorpe. - The development of the site offers the potential to make a significant contribution to housing numbers in line with the Doncaster’s Spatial Strategy and would help provide affordable housing and meet housing needs in a sustainable location. - The development of the site will contribute towards sustainable economic growth through direct construction employment and indirect employment and would create an increase in spending power arising from the additional population amongst other fiscal benefits. - The development would contribute to attracting an influx of people in to the area by offering a range of houses and would also assist in the urban regeneration of the area given the economics of the area Ongoing dialogue would be welcome, and the respondent will seek to meet relevant Council officers in 2019.

Response:
Noted - conclusion comments with the detail being picked up through the various parts of the local plan the Representation refers to elsewhere in this summary/response document.
3.40 Overall, Policy 4 and the allocation of Site 001 for the delivery of employment uses is considered to be: 1 Positively prepared - in allowing for the delivery of objectively assessed needs; 2 Justified - in providing an appropriate strategy and site specific allocation which accords with the spatial strategy and priorities for the location and distribution of growth identified in strategic policies 2 and 3, including the delivery of employment allocations across the Borough, including in the defined Main Towns and in locations that can accommodate large buildings with good access to the M18/M180 and wider strategic road network; 3 Effective - in comprising a site which is deliverable over the plan period; and 4 Consistent with national policy - in facilitating the delivery of sustainable development in environmental, social and economic terms.

3.41 A number of amendments to the site-specific development requirements (set out in Appendix 2 of the Local Plan: Publication Version) are recommended in order to reflect the work undertaken and agreed to date on the current planning application, and to ensure that the site’s development and employment opportunities presented can be maximised in line with emerging market demand and the regeneration objectives established by the Doncaster Local Plan.
In order to provide further information and/or clarification regarding the support for Policy 2 / 3 / 31. In order to provide further information and/or clarification on any of the points raised within the accompanying Representations Report and/or Delivery Statement in respect of Policy 4 and the allocation of Site 001: J6, M18, Thorne North for employment use and to directly address any comments that may be raised by objectors to the allocation.

Policy: Miscellaneous - Conclusions

Tests of Soundness:

5.1 As the major landowner and delivery partner of Site 001: Thorne North J6 M18, Mr Donald Parkinson and Barmston (Thorne) Ltd submit their full support for the allocation of this site for employment uses under Policy 4 of the Doncaster Local Plan. 5.2 The Council is justified in allocating Site 001 on the basis of the strategic spatial strategy (Policy 2) and identified priorities for the location and distribution of growth (Policy 3), and the presence of Site 001 itself also demonstrates that sites which accord with these spatial priorities are available and that DMBC is justified in adopting this approach. 5.3 This report, and the accompanying Delivery Statement and Illustrative Masterplan, has demonstrated that Site 001 is available for immediate development; is suitable for the development of employment uses as proposed by the allocation; and comprises a viable development site for which there is evident commercial interest and market demand. 5.4 The site is therefore wholly deliverable in order to meet Doncaster’s objectively assessed employment needs in the forthcoming plan period and thus comprises an effective and deliverable policy in accordance with the tests of soundness set out in the National Planning Policy Framework NPPF. 5.5 Overall, Policy 4 and the allocation of Site 001 for the delivery of employment uses is considered to be: 1 Positively prepared - in allowing for the delivery of objectively assessed needs; 2 Justified - in providing an appropriate strategy and site specific allocation which accords with the spatial strategy and priorities for the location and distribution of growth identified in strategic policies 2 and 3, including the delivery of employment allocations across the Borough, including in the defined Main Towns and in locations that can accommodate large buildings with good access to the M18/M180 and wider strategic road network; 3 Effective - in comprising a site which is deliverable over the plan period; and 4 Consistent with national policy - in facilitating the delivery of sustainable development in environmental, social and economic terms. 5.6 A number of amendments to the site-specific development requirements (set out in Appendix 2 of the Local Plan: Publication Version) are recommended in order to reflect the work undertaken and agreed to date on the current planning application, and to ensure that the site’s development and employment opportunities presented can be maximised in line with emerging market demand and the regeneration objectives established by the Doncaster Local Plan. 5.7 Comments are also made on a limited number of wider thematic Local Plan policies where these are of relevance to the future development of the site, notably to ensure constancy with the Habitats Regulations in terms of European designated sites and to ensure that the policies are positively prepared, effective, justified and consistent with national planning policy and other relevant habitats legislation, and can therefore be considered sound. 5.8 The Parkinson family and Barmston (Thorne) Ltd would be happy to provide further information and/or clarification on any of the points raised within this response, and wish to play an active role in participating in any future hearing sessions on such matters as part of the examination of the plan.

Summary:

The major landowner and delivery partner of Site 001 offer their full support for the allocation of this site for employment uses under Policy 4 of the Local Plan. The Council is justified in allocating Site 001 on the basis of the strategic spatial strategy (Policy 2) and identified priorities for the location and distribution of growth (Policy 3). Site 001 demonstrates that sites which accord with these spatial priorities are available. This representation demonstrates that Site 001 is available for immediate development; is suitable for employment uses and is a viable development site which has commercial interest and market demand. The site is wholly deliverable to meet Doncaster’s objectively assessed employment needs and comprises an effective and deliverable policy in accordance with the Tests of Soundness. Policy 4 and the allocation of Site 001 is considered to be: 1. Positively prepared - in allowing for the delivery of objectively assessed needs; 2. Justified - in providing an appropriate strategy and site specific allocation which accords with the spatial strategy and priorities for the location and distribution of growth identified in strategic policies 2 and 3, including the delivery of employment allocations across the Borough, including in the defined Main Towns and in locations that can accommodate large buildings with good access to the M18/M180 and wider strategic road network; 3. Effective - in comprising a site which is deliverable over the plan period; and 4. Consistent with national policy - in facilitating the delivery of sustainable development in environmental, social and economic terms. It is recommended that a number of amendments to Appendix 2 of the Local Plan to reflect the work undertaken and agreed to date on the current planning application and to ensure that the site’s development and employment opportunities can be maximised in line with market demand and regeneration objectives.

Response:
<table>
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<tr>
<th>CUSREF:</th>
<th>05294</th>
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<tbody>
<tr>
<td>Name:</td>
<td>Lichfields</td>
</tr>
<tr>
<td>Date:</td>
<td>30/09/2019</td>
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<tr>
<td>Organisation:</td>
<td>Lichfields</td>
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</tbody>
</table>

**Comment Ref:** C/Conclusion/05294/1/012

**Attend Examination:** Attend Hearing

**Reason:** To fully represent our clients land interest and respond to matters that may be raised at the hearing sessions. Please refer to accompanying representation 'Doncaster Local Plan Representations to Draft Doncaster Local Plan - Publication Draft' (September 2019) on behalf of Don Parkinson Partnership (doc ref. 60752/01/JG/AK).

**Area:** Miscellaneous - Conclusions

**Policy:** Miscellaneous - Conclusions

**Tests of Soundness:**

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**Comment:**

7.1 In these representations it has been demonstrated that the draft Local Plan is not sound as drafted. This is due to the plan not being positively prepared and failing to identify and allocate deliverable non-Green Belt sites before considering the release of Green Belt land in accordance with the NPPF. Don Parkinson considers that the Council should revisit its strategy for housing allocations and seek to deliver housing on non-Green Belt sites in the first instance.  7.2 Don Parkinson has control of a sustainable site within Thorne which is not currently allocated but suitable to help meet the Council's housing requirement and reduce the need for Green Belt release sites. Don Parkinson has entered into discussions with the Environment Agency in respect of the site currently in a Flood Zone 3 designation and it is considered that there is a suitable technical solution to support the delivery of housing on the subject site.  7.3 Other policies which should be modified to ensure they are capable of being considered sound include, Policies 2 and 26, which restrict the delivery of sustainable unallocated housing sites coming forward if the Council can demonstrate a five-year supply. Furthermore, the policy seeks to restrict housing delivery to circumstances which justify a rural location. These policies do not reflect the fact that areas of Countryside are located adjacent to Main Towns which are more urban in character and can be brought forward as sustainable extensions to established settlements.  7.4 Don Parkinson considers that the proposed amendments to the Plan, which could result in the Plan being considered to be both positively prepared and sound, can be achieved through the process of Main Modifications to the Publication Plan, should it proceed to Examination in the current form.

**Summary:**

The Local Plan is not sound. It is not positively prepared and fails to identify and allocate deliverable non-Green Belt sites before considering the release of Green Belt land in accordance with the NPPF. The Council should revisit its strategy for housing allocations and seek to deliver housing on non-Green Belt sites in the first instance. The site is sustainable and if allocated could help meet the housing requirement and reduce the need for Green Belt release. Discussion are taking place with the EA and there is a suitable technical solution to support the delivery of housing on the site. Policies 2 and 26 should be modified in order to be made sound. They currently restrict the delivery of sustainable unallocated housing sites coming forward. They restrict housing delivery to circumstances which justify a rural location. The policies do not reflect the fact that areas of Countryside are located adjacent to Main Towns which are more urban in character and can be brought forward as sustainable extensions to established settlements. It is considered that the proposed amendments could be achieved through Main Modifications and would mean that the plan would be positively prepared and sound.

**Response:**
Comment:

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Summary:
The draft plan is not sound. It has not been positively prepared and fails to identify and allocate deliverable non-Green Belt sites before considering the release of Green Belt land. The Council should revisit its housing allocations to deliver non-Green belt sites first. This site in Thorne is suitable to help meet the Council’s housing requirement and reduce the need for Green Belt release sites. Discussions with the EA have shown there is a suitable technical solution to support the delivery of housing development. Other policies which should be modified to ensure they are sound. These include policies 2 and 26, which restrict the delivery of sustainable unallocated housing sites coming forward. The policy restricts housing to circumstances which justify a rural location. They do not reflect the fact that areas of Countryside are located adjacent to Main Towns which are more urban in character and can be brought forward as sustainable extensions to established settlements. The proposed amendments can be achieved through the process of Main Modifications to the Publication Plan, should it proceed to Examination in the current form.

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Summary:

The Local Plan is not sound. It is not positively prepared and fails to identify and allocate deliverable non-Green Belt sites before considering the release of Green Belt land in accordance with the NPPF. The Council should revisit its strategy for housing allocations and seek to deliver housing on non-Green Belt sites in the first instance. The site is sustainable and if allocated could help meet the housing requirement and reduce the need for Green Belt release. Discussion are taking place with the EA and there is a suitable technical solution to support the delivery of housing on the site. Policies 2 and 26 should be modified in order to be made sound. They currently restrict the delivery of sustainable unallocated housing sites coming forward. They restrict housing delivery to circumstances which justify a rural location. The policies do not reflect the fact that areas of Countryside are located adjacent to Main Towns which are more urban in character and can be brought forward as sustainable extensions to established settlements. It is considered that the proposed amendments could be achieved through Main Modifications and would mean that the plan would be positively prepared and sound.

Response:
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.

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<th>Tests of Soundness:</th>
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**Summary:**

General (all points covered in other sections of the representation and analysis)
- Plan period should be 15 years from adoption.
- Housing requirement should be increased and stated as a minimum.
- Support release of land from Greenbelt in some circumstances but have concerns regarding approach at Carcroft/Skellow (see comments in other sections)
- Promotes Ings Lane site for release from Greenbelt and casts doubt on deliverability/viability of other allocated sites (covered in other sections of this rep.)

**Response:**

- Attend Examination: Attend Hearing
Comment:
Whilst Marr Parish Meeting welcomes the opportunity to provide input into the development of the Local Plan, we are still extremely concerned that the process would seem to prioritise the demands and requirements of Developers and Landowners resulting in a plan driven by the commercial aspirations of private organisations and not by the residents of Doncaster. We further believe, if the right balance is not achieved, then the resulting Plan cannot be considered robust, effective, sound or fit for purpose nor in the best interest of the Borough nor its residents. We ask that Marr Parish’s submission be included in the Doncaster Local Plan Consultation and we request that the content of our feedback is forwarded to the Inspector and that it will be carefully considered.

Summary:
Whilst Marr Parish Meeting welcomes the opportunity to provide input into the development of the Local Plan, we are still extremely concerned that the process would seem to prioritise the demands and requirements of Developers and Landowners resulting in a plan driven by the commercial aspirations of private organisations and not by the residents of Doncaster. We further believe, if the right balance is not achieved, then the resulting Plan cannot be considered robust, effective, sound or fit for purpose nor in the best interest of the Borough nor its residents. We ask that Marr Parish’s submission be included in the Doncaster Local Plan Consultation and we request that the content of our feedback is forwarded to the Inspector and that it will be carefully consider

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