HEARING STATEMENT

MATTER 1: LEGAL AND PROCEDURAL REQUIREMENTS AND OTHER GENERAL MATTERS (REF: 05173 / 05174)

ON BEHALF OF METACRE LIMITED

Word count (excluding Inspector’s questions) – 891

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004

Prepared by: Matthew Good
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1.0 Introduction

1.1 This hearing statement is provided on behalf of our client Metacre Limited. It is made in respect of ‘Matter 1: Legal and Procedural Requirements and other General Matters’ Responses are provided solely to questions which are directly relevant to our client’s site and previous submissions made on their behalf.

1.2 Metacre Limited are promoting two sites through this Local Plan. These being:

- Land at Crabgate Lane, Skellow (site reference: 186) – this is part of the proposed site allocation Land north of A1, Skellow in combination with site reference 165, and
- Land at Mill Lane, Skellow (site reference: 185)

1.3 Our Client is an important stakeholder in the plan making process and wishes to ensure that the Doncaster Local Plan is prepared in a robust manner that passes the tests of soundness contained in the National Planning Policy Framework (NPPF) (para. 35), namely that the plan is:

- Positively Prepared;
- Justified;
- Effective; and
- Consistent with national policy.

1.4 Our client supports many of the policies within the Local Plan and believes with modifications the plan should be found sound. We welcome the opportunity to comment on the Inspector’s Matters, Issues and Questions and provide the following responses to selected questions in so far as they relate to our previous representations.
2.0 Inspectors Questions

2.1 The omission of a response to a specific question should not be construed as our client having nothing further to add. Our client reserves the right to respond not only to the questions identified in this hearing statement but others as relevant and deemed necessary during the hearing session(s).

2.2 The questions are taken in order of publication within the Matters, Issues and Questions document (ref: INSP4).

Sustainability Appraisal

Q1.5. Did the sustainability appraisal consider and compare reasonable alternatives as the Plan evolved, including for the broad spatial distribution of housing, economic and other development? Was the Plan informed by the findings of the sustainability appraisal?

2.3 The sustainability appraisal at submission did not assess the full range of appropriate and reasonable alternatives in relation to the housing requirement. In particular it did not consider a housing requirement of 1,073 dwellings per annum (dpa). Whilst this was rectified after submission in the sustainability appraisal addendum (ref: CSD7), published March 2020, this document clearly did not inform the plan.

2.4 It is notable from Appendix C of the addendum that a requirement of 1,073dpa does not score substantively worse for any of the sustainability objectives compared to the Council’s favoured figure of 920dpa. We address the inadequacy of the 920dpa figure within our comments upon matter 2.

Spatial Strategy

Q1.8. Is the Plan consistent with national planning policy that expects strategic policies to look ahead over a minimum 15 year period from adoption, or is it otherwise justified?

2.5 No, paragraph 22 of the National Planning Policy Framework is clear in that strategic policies should look ahead over a minimum 15-year period from adoption. The Plan covers the period 2015 to 2035; as it is unlikely the Plan would be adopted before 2021, the plan period is required to look ahead to
2036 as a minimum.

Q1.12. Are the spatial strategy and allocations in the Plan, including those listed above, consistent with national planning policy relating to development and flood risk?

2.6 Our client is supportive of the allocation of Land at Crabgate Lane, Skellow (site reference: 186) in combination with site reference 165, which is located entirely within flood zone 1, though holds concerns with the Council’s approach to site selection with regard to flood risk in other cases.

2.7 The Council have identified several housing allocations in flood zones 2 and 3, however there are considered to be sequentially preferable sites for allocation. An example is Land at Mill Lane, Skellow (site reference: 185); this site represents a sustainably located site which is available and deliverable and would contribute towards meeting housing requirements over the minimum 15-year period. While Land at Mill Lane, Skellow (site reference: 185) was rejected as a site allocation as a result of the fact that part of the site is located within flood zones 2 and 3, these elements only make up a small percentage of the overall site and do not make the site unsuitable in its entirety. Our client has demonstrated, through a site promotion document (attached as appendix 1), that the development can be appropriately designed to exclude built development from flood zones 2 and 3 and that residential development can be positioned entirely within flood zone 1.

2.8 Indeed, the majority of the site is located within Flood Zone 1 as identified by the Environment Agency Flood Map for Planning and is therefore considered to be at lowest risk of flooding, only a small section of the southern part of the site is located within Flood Zones 2 and 3. Preliminary flood risk and drainage technical work for this site has found that there are drainage mechanisms and/or engineering solutions which would reduce or remove the risk of flood, alongside a sequential approach to steer residential development to the areas of lowest flood risk within the site. The site promotion document clearly demonstrates that all development can be accommodated in flood zone 1 on this site.

2.9 The rejection of this site appears to be a blanket approach which does not have regard for site-specific intricacies such as the potential for flood risk to be
designed out and minimised; concerns are raised in this regard.
Appendix 1: Mill Lane, Skellow Site Delivery Document