HEARING STATEMENT

MATTER 1: LEGAL AND PROCEDURAL REQUIREMENTS AND OTHER GENERAL MATTERS

Word count (excluding Inspector’s questions) – 898

ON BEHALF OF PERSIMMON HOMES SOUTH YORKSHIRE (Ref: 05289 / 05290 / 03431)

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

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1.0 Introduction

1.1 This hearing statement is provided on behalf of our client Persimmon Homes South Yorkshire. 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 Persimmon Homes are one of the largest home builders in the country with an excellent track record of delivery. They are promoting three sites through this Local Plan. These being:

- Land to the East of Warning Tongue Lane, Cantley (site reference: 164/430) – this is a proposed site allocation,
- Armthorpe Lane, Kirk Sandall (site reference: 116), and
- Cemetery Road, Hatfield Woodhouse (site reference: 119)

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 (MIQs) 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.

Q1.11. Is the Plan consistent with national planning policy relating to the mitigation of, and adaptation to, climate change?

2.6 Our client is supportive of the allocation of Land to the East of Warning Tongue Lane, Cantley (site reference: 164/430) which is located in flood zone 1, though raises concerns with the Council’s approach to site selection with regard to flood risk on various other housing allocations.

2.7 The Council’s response to PQ11 identifies 7 housing allocations that did not have planning permission on 1 April 2018 which are wholly or partly in flood zones 2 or 3. Our client considers the sites at Armthorpe Lane, Kirk Sandall (site reference: 116), and Cemetery Road, Hatfield Woodhouse (site reference: 119) represent sequentially preferable sites to these allocations, as per paragraph 158 of the National Planning Policy Framework which seeks to steer new development to areas with the lowest risk of flooding.

2.8 The site at Armthorpe Lane is located predominantly in flood zone 1 and was discounted from further consideration as a result of the sites flood risk when only approximately 25% of the site was located within Flood Zone 3. Our client has prepared a Site Delivery Document (attached as an appendix to this document) which demonstrates the site would achieve the three overarching objectives of sustainable development in a part of the borough identified for the highest level of growth; to which the Council has not had proper regard for in discounting the site from consideration. The site has the capacity to accommodate at least 300 homes, and potentially over 400, within flood zone 1, and is owned outright by our client and is thereby available and deliverable immediately.

2.9 The site at Cemetery Road is located within flood zone 1 and as such is sequentially preferable to the 7 housing allocations identified in the MIQs. This site was discounted from allocation due to the identification of Hatfield Woodhouse as a village in the settlement hierarchy and as growth is generally centred to the ‘Main Urban Area’ and ‘Main Towns’. Hatfield Woodhouse is located less than one kilometre from Hatfield; which is identified as a ‘Main Town’ and is thereby a sustainable location for growth, and is closely related to other ‘Main Towns’. The site represents a sustainable location for
development and is a sequentially preferable location for development in flood risk terms. There are no known technical constraints which would prevent the development of the site and it is considered available and deliverable.

**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?**

2.10 No, as alluded to in paragraphs 2.4 – 2.7, the Council have identified several housing allocations in flood zones 2 and 3, when there are sequentially preferable sites which are sustainable located and are available and deliverable.
Appendix 1: Armthorpe Lane, Kirk Sandall Site Delivery Document