MATTER 1

THE STRATEGIC LAND GROUP (04444)

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?

1.1 The sustainability appraisal (SA) did not consider reasonable alternatives for the broad spatial distribution of housing and the Doncaster Local Plan (Plan) was not informed by the findings of the SA in respect of the proposed housing distribution.

Informing the plan

1.2 The SA process started with six different approaches to delivering Doncaster’s growth aspirations, which were gradually refined to produce the four options which are considered in the Sustainability Appraisal Report 2019 (SAR 2019).¹

1.3 Option 4 – a hybrid of Option 1 (Core Strategy approach) and Option 2 (Doncaster and Main Towns focus) - is stated to be the preferred approach. However, Option 4 does not reflect the actual distribution of housing proposed in the Plan.

1.4 Table 1 summarises the housing ranges for each of the four SA options (taken from the SA of Doncaster’s Growth Options, March 2016) and compares it to the proposed distribution of new homes (taken from Table 3.3 of the Sustainability Appraisal Report Addendum 2020 (SARA 2020)². To assist in interpreting the figures, green shading has been used where the proposed distribution in the Plan falls within the SA Option 4 range (or within 20% of the Option 4 fixed target). Red shading has been used where the proposed distribution falls outside the SA Option 4 range (or differs by more than 20% from the Option 4 fixed target). Of the 18 settlements in the hierarchy, only 8 have a proposed distribution that is close to the SA Option 4 figures.

¹ Examination Library Reference CSD7.1
² Examination Library Reference CSD7
1.5 It is not our submission that the precise distribution of homes in the Plan should be subject to SA. However, the Practice Guidance makes clear that if there is a significant change to the proposals, the SA should be updated. It goes on to clarify that “[a] change is likely to be significant if it substantially alters the plan and/or is likely to give rise to significant effects.”§ It is self-evident that the proposed distribution of new homes in the Plan is significantly different to Option 4. As a consequence, it has not been subject to an SA.

1.6 The SARA 2020 seeks to address this concern at §3.34 to §3.3.6. However this amounts to little more than an explanation as to why the proposed distribution has changed - it does not address the sustainability of the distribution itself. The SARA 2020 also points us to Appendices H, I and J of the SAR 2019. None of these appendices consider the sustainability of the proposed distribution of new homes.
1.7 This is of particular concern given the twin challenges of flood risk and green belt with which this Plan has to contend. In justifying the choice of Option 4, the Publication Draft SA (2019) notes at §5.2.23 that the Option would steer development away from Thorne and Moorends once the sequential test was applied and focus “more growth around the cluster of villages and towns in the south west of the Borough (e.g. Finningley, Auckley and Hayfield Green and Tickhill) where there are no known flood risk constraints.” When the precise distribution of homes between settlements is central to the way the Plan intends to deal with flood risk, it is imperative that it is properly reflected in the SA.

1.8 Similarly, SAR 2019 notes that, overall, Option 4 provides an “appropriate balance” between urban concentration and delivering some development in the rural areas. Again, when the proposed distribution of new homes differs so greatly from that proposed, it cannot be certain that the same conclusion applies.

1.9 It is clear that the proposed distribution bares no relation to the distribution that has actually been subject to SA – it is significantly different. Given the weight afforded to the precise distribution of homes in choosing Option 4 – especially in respect of its impact on flood risk and green belt – that is a significant failing of the SA.

Reasonable alternatives

1.10 Although the council have acknowledged the challenges presented by the green belt and flood risk in the SA, they have not informed the options to be assessed. The four growth options considered essentially comprise differing degrees of urban concentration.

1.11 In respect of green belt, the SAR 2019 notes that Option 4 “will have a greater impact on the openness of the Green Belt and countryside that Options 1 and 2.”

1.12 As noted earlier in our §1.7, the SAR 2019 also notes that Option 4 focusses more development in Moorends and Thorne – settlements where the flood risk is expected to be highest, but that “a much lower figure is anticipated due to the application of the

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4 SAR 2019 §5.2.29
5 Ibid. §5.2.29
sequential flood risk.”\textsuperscript{6} As our Table 1 (above) shows, this has not transpired in practice.

1.13 Similarly – and also as noted in our §1.7 above - the justification for Option 4 explains that it “focusses more growth around the cluster of villages and towns in the south west of the Borough (e.g. Finningley, Auckley and Hayfield Green and Tickhill) where there are no known flood risk constraints.”\textsuperscript{7} In reality the proposed distribution would see those three settlements (which we submit are actually four settlements at Matter 3) deliver just 379 new homes – roughly 2% of the 18,400 dwelling target. This does not comprise “focussing more growth.”

1.14 This is compounded by the justifying text in the Plan to Policy 3\textsuperscript{8} which seems to suggest that the sequential test has been applied on the basis that the spatial distribution must be met, and no consideration has been given as to whether other sites in other settlements might be more suitable (this is a point we consider in more detail in response to Q.1.12).

1.15 Taken together, this shows that although the council have considered green belt and flood risk in the sustainability appraisal process, they have not considered an option that would seek to minimise the impact on either flood risk or the green belt. Given the importance of both those designations in national planning policy, and the large parts of the borough impacted by them, this must be considered a reasonable alternative.

Summary

1.16 On the basis of these failings of the SA, the Plan cannot be considered justified or in conformity with national policy. It is not sound. To remedy this situation, the council should update the SA to include consideration of both the proposed distribution of new homes and alternative distributions which seek to minimise the impact of development on flood zones and the green belt.

\textsuperscript{6} Ibid. §5.2.23
\textsuperscript{7} SAR 2019, §5.2.23
\textsuperscript{8} Doncaster Local Plan 2015-2035, §4.41 (Examination Library Reference CSD4)
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?

1.17 The Plan will not be adopted before 2021 and it will not, therefore, cover the minimum 15 year period from adoption. We would recommend extending the Plan period until 2037 to ensure there is a minimum of 15 years from adoption and providing a little contingency against further delays in the Plan process.

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?

1.18 The thrust of national planning policy is that it is desirable to locate housing development outside of areas at risk of flooding as far as reasonably possible. To achieve that, national policy directs that the sequential test should first be applied to direct sensitive development – such as housing – away from areas of flood risk. “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)” then the exception test should be applied to consider how that development can be made safe.

1.19 This is a clear two stage process. First the sequential test is applied. Secondly – and only if the exception test identifies too few sites – the exception test is applied. This does not appear to be the process that has been followed in preparing the Plan.

1.20 Some of the concerns we have in respect of the treatment of flood risk in establishing the proposed distribution of new homes have been set out in our response to Q1.5. Fundamentally, flood risk has not informed the proposed distribution of homes.

1.21 In respect of plan-making, the Practice Guidance explains that “the Sequential Test should be applied to the whole local planning authority area to increase the possibilities of accommodating development which is not exposed to flood risk.” This has not taken place. While the SAR 2019 justifies the Option 4 distribution partly on the basis of directing growth to the south west of the borough where the risk of flooding is lowest.

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9 National Planning Policy Framework, §159.
10 Planning Practice Guidance, Paragraph: 020 Reference ID: 7-020-20140306
11 SAR 2019, §5.2.23
this has not happened in practice. Just 2% of the housing requirement is to be delivered in the four settlements named as examples.

1.22 At §4.41, the Plan notes that “[t]he flood sequential approach is applied to urban sites and sustainable urban extensions across these settlements subject to the growth ranges” (my emphasis). A correct reading of the Practice Guidance however tells us that the sequential test should not be subject to settlement growth ranges – it should be applied to the whole borough. Where development could be sustainably located in another part of the borough and would be at a reduced risk of flooding, the Plan should allocate that site in preference.

1.23 The apparently haphazard approach that has been taken to flood risk is underlined by the difficulty in identifying precisely which proposed allocations fall within areas of flood risk. Despite repeated requests throughout the plan-making process, useable information identifying which proposed allocations were at risk of flooding was not made available until the Inspector specifically requested it in his Preliminary Issues and Questions. If flood risk had genuinely been taken into account as part of the plan-making process, that information would have been readily available at an early stage in the process.

1.24 The information that has now been provided confirms that there are a number of homes proposed to be delivered in areas at risk of flooding. There is no information available to explain why those homes could not be delivered on alternative sites within the borough which are not at risk of flooding, despite there being a number of such sites before the examination (such as Site 1013 in Auckley).

1.25 The Plan is not, therefore, consistent with national policy in respect of flood risk. Consideration should be given to identifying alternative sites which are not at risk of flooding via the application of the sequential test.