Council Statement - Local Plan Examination and Covid-19

When the Council submitted its Local Plan on 4th March 2020 it could not have anticipated the unprecedented changes to our way of life resulting from Covid-19, which was only in the following week declared to be a pandemic by the World Health Organisation (WHO).

The impact of the pandemic will inevitably have long lasting effects on Local Plan implementation. These effects are difficult, if not impossible, to predict. Effects will vary from short, medium to long term. The unprecedented impacts on the economy currently being experienced during the period of 'lockdown' that started in late March may be long lasting. Alternatively economic recovery may be relatively quick.

In responding to the Inspector's Preliminary Questions (PQs), and engaging in the ongoing examination of the Local Plan, the Council considers it is important to set out how it intends to frame its response to the Examination in the context of Covid-19 and the impact it may have on the Local Plan.

It is the Council's view that examination of the Local Plan and progress towards Plan adoption should proceed as swiftly as possible. The certainty that an up-to-date Local Plan can bring to informing planning decisions, and encouraging economic investment and supporting the social and environmental well-being of the Borough, will greatly assist Doncaster's recovery from Covid-19.

The Plan is proposing a Strategy, and an accompanying suite of policies and proposals, that have been prepared to be consistent with national planning policy and which the Council considers best respond to the challenges and opportunities Doncaster faces as identified during plan preparation. The Local Plan has in-built flexibility, for example, the range of deliverable plan allocations that have been identified to meeting housing and employment needs, and the number of positively worded policies that have been written in a way that can respond and adapt to change. Such flexibility will assist the Local Plan's ability to effectively respond to the need for economic recovery and the specific challenges that we will face in the post-pandemic world.

Longer-term effects are inevitably harder to predict. However, the Local Plan is proposing a robust monitoring framework which will work, alongside Government requirements, such as the Housing Delivery Test (HDT), to inform any need for an early review of the Local Plan that might be required in response to the longer term effects of Covid-19.
The Council will respond positively to any suggestions of Examination participants or recommendations of the Inspector that may better assist the Local Plan’s ability to respond to the Covid-19 emergency and its effects.

Council’s Note on References

Please note, all of the references in the Council’s responses below are to the Doncaster Local Plan 2015-2035 (Publication version – June 2019 – CSD3) unless otherwise stated. Other references to supporting evidence base and Topic Papers are provided with the reference numbers as per the examination library provided in brackets. Occasionally the Council has also included footnotes in addition to those provided by the Inspector for ease of reference.

The Inspector’s Preliminary Questions – Issued 7th April 2020

Duty to Cooperate

PQ1. What were the strategic matters\(^1\) that the Council needed to address during the preparation of the Plan by working cooperatively with neighbouring authorities, prescribed bodies and other relevant parties? Please briefly summarise the main mechanisms that were used to ensure effective and on-going joint working.

Council response – Throughout the preparation of the Doncaster Local Plan there were four key strategic matters that needed to be addressed by working cooperatively with neighbouring authorities, prescribed bodies and other relevant parties. These are included in the Statement of Common Ground (SoCG – CSD13) and are:

- The impact of proposed development on the Strategic Road Network (SoCG Agreement 7) which was collaborative working with Highways England;
- The impact of development on the Local Highway Network (SoCG Agreement 8) which was collaborative working with Barnsley Council and the Mayoral Combined Authority. This also addresses SoCG Agreement 10 regarding Air Quality and Noise;
- The impact of development on the Local Highway Network (SoCG Agreement 8) which was collaborative working with Bassetlaw District Council – this also addresses SoCG Agreement 10 regarding Air Quality and Noise; and,
- The provision of adequate aggregate minerals which was collaborative working with neighbouring authorities and Aggregate Working Parties (Agreement 19).

The SoCG (CSD13) includes a total of 19 Agreements covering matters. However, the four listed above required the most discussion and more detail is given below.

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\(^1\) “Strategic matters” are defined in section 33A(4) of the Act and include sustainable development or use of land that has or would have a significant impact in at least two planning areas or, in a two-tier area, is, or would have a significant impact on, a county matter.
The impact of proposed development on the Strategic Road Network – Highways England
Doncaster Council and Highways England developed a collaborative approach to improvements on and around the Strategic Road Network (SRN). Highways England undertook modelling work to review the potential cumulative impact on the SRN and as a result of that both parties agreed the principle of necessary mitigations. This is expanded upon further in Table 1 (page 11) and Table 2 (page 21) of the Statement of Compliance with the Duty to Cooperate (CSD12), and paragraphs 61 – 62 of the SoCG (CSD13).

The impact of proposed development on the Local Highway Network – Mayoral Combined Authority and Barnsley Council
Doncaster Council, Barnsley Council and the Mayoral Combined Authority are undertaking strategic discussions and collaborative working to investigate potential mitigation and funding opportunities to address issues along the A635. This is a low capacity, single carriageway road which presents significant air quality challenges in the Doncaster villages of Hickleton and Marr. All parties are working on a feasibility study and business case for the delivery of a bypass. This is expanded upon further in Table 1 (page 11) and Table 2 (page 17 and 23) of the Statement of Compliance with the Duty to Cooperate (CSD12), and paragraphs 63 of the SoCG (CSD13). This is also addressed in Agreement 10 – Air Quality and Noise (paragraph 70 of the SoCG – CSD13).

The impact of proposed development on the Local Highway Network – Bassetlaw District Council
Doncaster Council and Bassetlaw District Council have worked closely together on addressing the impact that development in Bassetlaw (at the settlement of Harworth/Bircotes) is having on Doncaster’s local road network. After reviewing the results of the transport modelling work, which shows that 4 out of 5 assessed Doncaster junctions are over capacity, the Councils have agreed to work together to investigate how mitigation schemes will be delivered and funded. This is expanded upon further in Table 1 (page 11) and Table 2 (page 17) of the Statement of Compliance with the Duty to Cooperate (CSD12), and paragraphs 63 of the SoCG (CSD13). This is also addressed in Agreement 10 – Air Quality and Noise (paragraph 70 of the SoCG – CSD13).

The provision of adequate aggregate minerals
Doncaster Council collaborated with relevant neighbouring authorities and Aggregate Working Parties (AWP) to address and ensure the provision of adequate minerals for the planned infrastructure and development proposals identified in Local Plans. Doncaster produces, uses, and exports limestone, sand and gravel aggregate and there is a regional and sub-regional flow of aggregate minerals between areas which predominantly makes up the area covered by the Yorkshire and Humber AWP and to a lesser degree the East Midlands AWP. Agreement 19 in the SoCG assists Doncaster in addressing the NPPF requirements in terms of aggregate flows to and from the plan area. The main mechanisms for ongoing collaboration and joint working are the good ongoing working relationships with the regional authorities supported, by the AWPs. As a result of the collaborative working some amendments were made to Agreement 19. This is expanded upon further in Table 1 (page 15) and Table 2 of the Statement of Compliance with the Duty to Cooperate (CSD12), and paragraphs 83 – 87 of the SoCG (CSD13).
The main mechanisms used
Doncaster Council used a tailored approach depending upon the neighbouring authority, prescribed body or other relevant party. A range of methods have been used including one to one meetings, email correspondence, telephone conversations, workshops, working party meetings and Sheffield City Region Heads of Service meetings. All parties were also consulted during the relevant Local Plan preparation stages and at each stage of the SoCG. Some neighbouring authorities or prescribed bodies required more input and involvement than others and the approaches listed above were used as and when appropriate. Appendix 2 – ‘Collaborative working with neighbouring authorities and prescribed bodies’ in the Statement of Compliance with the Duty to Cooperate (CSD12) lists each neighbouring authority, prescribed body, and which means of communication were used and when.

It is considered that the Council has met the duty to cooperate requirements. The Council has engaged constructively, actively and on an ongoing basis with all neighbouring authorities and prescribed bodies. The Council has worked to resolve, address and consider any strategic matters which have arisen during the preparation of the Local Plan. Collaborative working will continue both throughout the Doncaster Local Plan period and in relation to neighbouring authorities’ local plan preparation.

Strategic Priorities

PQ2. What are the strategic priorities for the development and use of land in the Borough? Which policies in the Plan are intended to address those priorities?

Council response - At the most strategic level, the Borough’s priorities for the development and use of land are set out in the Local Plan’s Vision (page 14 of Chapter 3).

To help achieve this Vision and inform the Local Plan’s policies, the Plan also includes a series of objectives (page 15-16 of Chapter 3). These provide more detail on the priorities. Covering 9 key areas these are the ‘hooks’ for the policies – each of the subsequent Local Plan chapters and associated policies are designed to reflect and deliver these objectives.

Table 3 of CSD17 (page 46-49) identifies more explicitly how the policies seek to implement the Plan’s objectives.

33 of the Local Plan’s policies are identified as being ‘Strategic’ and therefore as being particularly important in identifying and delivering the strategic priorities of the Local Plan. In addition, and to be read in conjunction with the Plan’s Key Diagram (Figure 4, page 44), the policies of Chapter 4 set out the higher level strategic approach to meeting the Borough’s strategic priorities. The identification of a policy as strategic for the development and use of land in Doncaster was informed by an analysis against the NPPF and PPG (as informed by Sections 19(1B and 1C) of the 2004 Planning and Compulsory Purchase Act) as to whether they:

- provide overarching direction / objective.
- shape broad characteristics of development.

2 Sections 19(1B and 1C) of the 2004 Act.
• are of strategic scale.
• provide strategic framework for decisions / balancing competing priorities.
• are required as essential to achieving wider vision/ aspirations of the Local Plan.

It should also be noted that the Local Plan seeks to implement the strategic priorities for the development and use of land set out in national planning policy in the NPPF (and the other national policy referred to in the introduction to the NPPF). As such the Local Plan sets out in more detail, where necessary, the local application of the NPPF’s national priorities for the development and use of land. How the Local Plan achieves this is set out in detail in CSD15.

**Climate Change**

**PQ3. Which policies in the Plan are designed to secure that the development and use of land in the Borough contribute to the mitigation of, and adaptation to, climate change?**

**Council response** - The Local Plan has been prepared in line with Section 19 of the 2004 Planning and Compulsory Purchase Act, as amended by the 2008 Planning Act, to ensure that, taken as a whole, the policies in the Plan contribute to the mitigation of and adaptation to climate change. The Local Plan provides an outcome-focused duty prioritising climate change through numerous policies. The document also reflects the requirements of the NPPF and PPG.

The Climate Change Topic Paper (DMBC1) identifies the national considerations in relation to climate change and planning and identifies how the Local Plan covers the requirements of the NPPF and the PPG. The detail can be found in Appendix 1 of the Topic Paper 1 (page 10 onwards). The Local Plan sets strategic priorities for the borough and provides the policies to help achieve the vision. The Local Plan vision, and specifically objectives 17 and 18, relate directly to climate change in relation to: reducing dependency on fossil fuels; transitioning to a low carbon economy; adapting to the effects of climate change through careful design and development; avoiding flood risk areas; and, managing the residual risks of flooding. The policies throughout the plan address: climate change mitigation and adaptation; conservation and enhancement of the natural and built environment; new development allocations (homes and employment); infrastructure; minerals; energy; historic environment; retail and town centres; design; health; community infrastructure; and, spatial proposals.

The plan acknowledges the need to transform in response to technology, economy, lifestyles and climate change and recognises the need to increase climate change resilience and energy efficiency of buildings and spaces. The plan also acknowledges the need to adapt to challenges include mitigating the effects of climate change from extreme weather events and flooding. The overall spatial strategy aims to deliver positive sustainable economic, social and environmental development, in line with paragraph 11 and Chapter 14 of the NPPF. Growth is distributed and managed in line with the settlement hierarchy, with the emphasis on the Main Urban Area, the 7 Main Towns and 10 Service Towns and Villages. With 50% of new homes in the Main Urban Area and 40% in Main Towns the aim is to reduce travel and avoid areas of flood risk where possible. Major new employment sites will be focused in locations accessible from the

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3 Section 19(1A) of the 2004 Act.
Main Urban Area and Main Towns at locations attractive to the market with good access to the strategic transport network. Retail, leisure, office, cultural and tourist developments will be located sustainably according to a network of centres based on a Sub-Regional Centre; 2 Town Centres; 9 District Centres and a number of Local Centres and Neighbourhood Shopping Parades. This will minimise unnecessary travel.

Local Plan - Chapter 14 Climate Change, Minerals, Resources & Energy
The policies in Chapter 14, and the Local Plan as a whole, set out how we will ensure that:

- we address and adapt to climate change;
- we follow a risk-based approach to the location of development to avoid flood risk where possible;
- where development is necessary in areas at risk from flooding the residual risks to people and property are properly managed;
- we increase the supply of low carbon and renewable energy;
- we protect best and most versatile agricultural land; and,
- we make the best use of our mineral resources.

Local Plan supporting chapters and policies include:

Policy 1: Presumption in Favour of Sustainable Development (Strategic Policy) - provides for Doncaster’s strategic approach being based on a desire to deliver sustainable growth.\(^4\)

Policy 4: Employment Allocations (Strategic Policy) - in particular the explanatory text (paragraph 4.55) states there is support for low carbon economy to help combat climate change. Paragraph 4.56 also says 'sites make best use of road and rail links and other infrastructure to help stimulate business growth particularly in manufacturing, green and high-tech industries'.

Policy 13: Strategic Transport Networks (Strategic Policy) - identifies locations for improvements to road and rail infrastructure plus improvements to bus transport.

Policy 17: Cycling in Doncaster - seeks to provide for new and improved cycling routes in Doncaster

Policy 18: Walking in Doncaster - states walking will be promoted as a means of active travel as well as for recreation. Improvements will be sought to walking connectivity throughout the Borough.

Chapter 10: Green Infrastructure - required for aiding resilience to climate change.

Policy 27: Green Infrastructure (Strategic Policy) – parts A9 and 10 specifically state that major development proposals will be supported that help 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 provide for long term protection and climate change resilience through smart developments, management and maintenance.

\(^4\) However, please note the Council is now proposing to remove Policy 1, but this has not yet been identified thus far through the process. Paragraph 11 of NPPF indicates that Local Plans should reflect the presumption in favour of sustainable development, this is done effectively through the numerous policies within the Plan. PPG paragraph 036 indicates there is no need for a plan to directly replicate the wording in paragraph 11 in a policy.
Policy 30: Ecological Networks (Strategic 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.

Policy 31: Valuing Biodiversity and Geodiversity (Strategic Policy) - states internationally, nationally, and locally important habitats, sites and species will be protected.

Policy 33: Woodlands, Trees and Hedgerows - states 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 a presumption against development that results in the loss or deterioration of ancient woodland and/or veteran trees.

Policy 34: Landscape (Strategic Policy) - states proposals will be supported that take account of the quality, local distinctiveness and the sensitivity to change of distinctive landscape character areas and individual landscape features, in particular Thorne and Hatfield Moors.

Policy 37: Listed Buildings - part C states measures for improving the energy efficiency of a listed building will be supported if they do not conflict with its special interest as a listed building.

Policy 43: Good Urban Design (Strategic Policy) – part B11 states high quality development that reflects the principles of good urban design will be supported that... reduce carbon emissions, adapt to climate change and make efficient use of natural resources during construction and operation through measures such as orientation, layout, inclusion of technology and material selection...

Policy 45: Residential Design (Strategic Policy) – part B11 states new housing, extensions, alterations and changes of use to housing will be supported where... flood resistance and resilience measures with an allowance for climate change are incorporated if located in, or adjacent to, flood risk areas...

Policy 47: Design of Non-Residential, Commercial and Employment Developments (Strategic Policy) - states ‘all non-residential and commercial developments, including extensions and alterations to existing properties, must be designed to be high quality, attractive, and make a positive contribution to the area and new major non-domestic applications (1000m² floor space or more, or a site of 1 hectare or above) must meet the BREEAM rating of at least ‘Very Good’, or any agreed equivalent standard, and secure at least 10% of their regulated energy from renewable sources (or equivalent carbon emission reductions)’.

Policy 57: Drainage - developments will need to provide for adequate drainage and appropriately manage flood risk to existing communities.

Policy 58: Flood Risk Management - all development proposals will be considered against the NPPF, including application of the sequential test.

Policy 59: Low Carbon and Renewable Energy (Strategic Policy) - states we aim to increase the supply of low carbon and renewable energy, which is essential to
meet commitments to reducing carbon emissions and combatting the effects of climate change.

Policy 60: Wind Energy Developments (Strategic Policy) - seeks to provide appropriate locations for renewable wind energy.

Policy 61: Protecting and Enhancing Doncaster’s Soil and Water Resources - the policy protects the best and most versatile agricultural land and ensures developments should not impact on water quality or harm aquifers and identifies the need for flood storage.

Policy 64: Reclamation of Mineral Sites - ensures that mineral extraction sites in biodiversity opportunity areas will direct reclamation towards the UK Biodiversity Action Plan priority habitats indicated in Policy 30 as a priority for that area.

As can be seen from the response above, the Local Plan contains a robust suite of policies covering the wide variety of issues relating to climate change. The overall spatial strategy aims to deliver positive sustainable economic, social and environmental development. The policies throughout the plan address climate change mitigation and adaptation, conservation and enhancement of the natural and built environment as well as new allocations (homes and employment), infrastructure, minerals, energy, historic environment, retail and town centres, design, health, community infrastructure and spatial proposals. Overall, the plan has a balanced approach to sustainable development and with respect to climate change.

**Equalities**

**PQ4. In what ways, positive and negative, are specific policies in the Plan expected to affect the three aims expressed in section 149(1) of the Equality Act 2010 and in particular affect people from groups with “protected characteristics”?**

**Council response** – The Local Plan has 9 Objectives to ensure that the needs of the borough are met and that no groups with protected characteristics may be negatively impacted by the plan. In addition, there are 72 specific planning policies to address the needs of individuals and groups, in accordance with national planning policy requirements. The Council’s Equalities Impact Assessment and Due Regard Statement (CSD8) sets out and evaluates each objective, policy and characteristic type.

Age, as a protected characteristic, will be protected through individual policies and development proposals in the Local Plan. The assessment of policies recognises that vulnerability can change across age groups and the impact of a policy will not necessarily be uniform across all ages. The policies within the plan are written positively to ensure that needs are appropriately assessed and addressed through individual development proposals. For example, Policy 8 (Delivering the Necessary Range of Housing – Strategic Policy) aims to make a positive contribution to the identified housing needs of the borough and will assist in developing diverse communities. It will have a positive impact on older people and those with specialist housing needs.

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5 Age; disability; gender reassignment; marriage and civil partnerships; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
Generally, policies within the plan are written positively with some having positive impacts on those with disabilities. Policy 46 (Housing Design Standards - Strategic Policy) ensures new houses are flexible and adaptable enough to provide a suitable living environment for people as their needs change i.e. residents living longer bringing with it health and disability issues which are associated with older age, including inclusive housing design ensuring houses are easily adaptable and capable of meeting the needs of a wide range of people including those with physical disability.

**Neighbourhood Plans**

**PQ5.** I note that there are made neighbourhood plans for Armthorpe, Bawtry, Burghwallis, Edlington and Tickhill°. Please provide a brief update on progress with other neighbourhood plans in the Borough.

**Council response** - The Council currently has 11 designated neighbourhood plan areas. Of which, 5 have adopted Neighbourhood Development Plans (‘made’) and 1 is awaiting a referendum after the scheduled one has been postponed due to Covid-19 in line with the Government’s updated PPG° published 7th April 2020. Table PQ5 below gives a brief update on the progress of each.

**Table PQ5: Current Neighbourhood Plans in Doncaster (as at April 2020)**

<table>
<thead>
<tr>
<th>Neighbourhood Plan Area</th>
<th>Formal Stage</th>
<th>Comments</th>
</tr>
</thead>
</table>
| Tickhill                | • Adopted    | • Made at Full Council on 24.11.2016  
• See examination library OTH14 |
| Burghwallis             | • Adopted    | • Made at Full Council on 24.11.2016  
• See examination library OTH12 |
| Edlington              | • Adopted    | • Made at Full Council on 19.07.2018  
• See examination library OTH13 |
| Armthorpe               | • Adopted    | • Made at Full Council on 22.11.2018  
• See examination library OTH10 |
| Bawtry                 | • Adopted    | • Made at Full Council on 21.11.2019  
• See examination library OTH11 |
| Edendurpe              | • Examined October – December 2019  
• Published for Referendum 10.02.2020 | • Examination undertaken and plan referred for referendum  
• Referendum was due to take place 19.03.2020  
• Now postponed due to Covid-19 and Gov’t advice is Referendums cannot take place until 06.05.2021. |
| Thorne and Moorends    | • Pre-submission consultation and publicity (Reg 14 consultation ended 12.12.2016) | • The Neighbourhood Plan Working Group are making some amendments to the plan. |
| Sprotbrough (not planning for the whole Parish area. Designated Area boundary) | • Pre-submission consultation and publicity (Reg 14 consultation) | • Doncaster Council responded to Reg 14 on 31.01.2020.  
• SEA responded to 25.02.2020.  
• Currently preparing Submission version of the plan. |

° Submitted documents OTH10 to OTH14.

° PPG - What changes have been introduced to neighbourhood planning in response to the coronavirus (COVID-19) pandemic? - Paragraph: 107 - Reference ID: 41-107-20200407 - Revision date: 07 04 2020
amendment – revised area agreed following 6 weeks publicity in December 2018) ended 31.01.2020

<table>
<thead>
<tr>
<th>Region</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rossington</td>
<td>• Designation of the Neighbourhood Area 27.11.2012</td>
</tr>
<tr>
<td></td>
<td>• Doncaster Council responded to Reg 14 01.04.2019</td>
</tr>
<tr>
<td></td>
<td>• SEA responded to 23.04.2019</td>
</tr>
<tr>
<td></td>
<td>• Currently preparing Submission version of the plan.</td>
</tr>
<tr>
<td>Auckley</td>
<td>• Designation of the Neighbourhood Area 11.06.2018</td>
</tr>
<tr>
<td></td>
<td>• Currently developing their Neighbourhood Development Plan</td>
</tr>
<tr>
<td></td>
<td>• Undertaken a ‘Call for Sites’ (ended on 28.09.2018)</td>
</tr>
<tr>
<td></td>
<td>• Undertaken informal consultation.</td>
</tr>
<tr>
<td>Stainforth</td>
<td>• Designation of the Neighbourhood Area 11.06.2018</td>
</tr>
<tr>
<td></td>
<td>• Currently developing their Neighbourhood Development Plan</td>
</tr>
<tr>
<td></td>
<td>• Undertaken informal community consultation and survey</td>
</tr>
<tr>
<td></td>
<td>• In addition, Stainforth Town Council is exploring the potential for a Neighbourhood Development Order.</td>
</tr>
</tbody>
</table>

PQ6. Why does the Plan not set out a housing requirement for each designated neighbourhood area as required by NPPF paragraph 65?

**Council response** - The Council consider that the housing requirement for each designated neighbourhood area is zero. This is because the Local Plan identifies sufficient sites overall to meet its housing allocation requirements and does not rely on neighbourhood plans making housing allocations to contribute to achieving the overall Local Plan housing allocation requirement.

Doncaster Council take a pro-active approach to Neighbourhood Plans and are frequently involved in meetings and readily available throughout the process in an advisory capacity. This includes discussing housing options with neighbourhood planning groups and setting out the Council’s housing position (existing and emerging). Whilst there is no requirement for neighbourhood plans to allocate housing sites, they are able to identify additional housing sites if they wish to do so.

The Council believes that this position needs to be made clearer within the Local Plan and would suggest the following could form the basis of a Main Modification to the plan for clarity.

New section (red text) included in the explanatory text to Policy 3: Level & Distribution of Growth (Strategic Policy) – Paragraph 4.49 page 35 with consequential amendments to the subsequent paragraph numbering for the remainder of this section.

**Approach to Housing & Neighbourhood Plans**

4.49 The Local Plan does not make specific housing requirements for individual areas. This is because the Local Plan identifies sufficient sites overall to meet its housing allocation requirements, and does not rely on neighbourhood plans making additional housing allocations therefore. Given national guidance is clear
that the Council should seek to avoid conflicts where possible between respective plans, and avoid duplication of the process, a number of sites allocated in the Local Plan have already been identified as allocations in ‘made’ and emerging neighbourhood plans. Whilst there is no requirement for neighbourhood plans to allocate housing sites, they are able to identify additional housing sites if they wish to do so, and provided that they are in general conformity with the strategic policies in the Local Plan.

**Plan Period**

PQ7. The Plan seems to cover the period 2015 to 2035. NPPF requires strategic policies to look ahead over a minimum 15 year period from adoption. It is unlikely that the Plan will be adopted before 2021. Do the strategic policies relating to housing and economic development identify sufficient land to meet needs to at least 2036?

**Council response** - The plan period was identified in line with the up-to-date Local Development Scheme (CSD14) and anticipates adoption of the plan in 2020, and therefore 15 years from adoption. The Council extended the end of the plan period (from 2032 to 2035) following revisions to NPPF in 2018, and post the Council’s 2018 Draft Policies & Proposed Sites consultation, to align with this as well as reflect consultation responses in respect to this matter. There is also now a statutory requirement to review local plans at least every five years meaning there would be at least 3 plan reviews before the 2035 end of the plan period date. The Council will be failing in its statutory duties therefore should the plan not be reviewed well before the end of the current plan period.

Notwithstanding this and, in respect to housing land supply, there are 3 allocations in the plan that are identified as delivering beyond the end of the plan period (i.e. 2035+) which have a combined capacity of 2,292 dwellings. Further detail is provided at section 7.11 of the Housing Topic Paper (DMBC4). There are 3 employment allocations in the plan which also have additional capacity post 2035 with a further 37 hectares available as set out in the Employment Land Supply Buffer Note at para 2.8 (SDEB9). With respect to minerals supply, then Areas of Search are identified for both during and beyond the plan period, and there are also the Minerals Safeguarding Areas for consideration beyond the plan period.

In conclusion therefore, the local plan’s strategic policies in relation to housing and economic development identifies sufficient land to meet the needs to at least 2036, despite the plan period ending in 2035.

**Green Belt**

PQ8. Please provide a list and maps of all changes to the Green Belt proposed in the Plan (other than minor changes to correct cartographical errors etc.). For each site, include a brief bullet point summary of the exceptional circumstances (战略性的 and site-specific, as appropriate) that justify the change.

**Council response** - The following sites in the following locations are the proposed Green Belt allocations. Table PQ8 shows that without allocating these Green Belt sites, these settlements cannot meet their housing targets, however
allocating Green Belt land helps a number of areas reach targets, or get some way towards these.

Table PQ8: Green Belt Allocations Summary

<table>
<thead>
<tr>
<th>Green Belt Site Ref</th>
<th>Capacity</th>
<th>Location</th>
<th>Housing target</th>
<th>Without Green Belt allocation</th>
<th>With Green Belt allocation(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>033</td>
<td>112</td>
<td>Main Urban Area</td>
<td>6,805 - 7,315</td>
<td>6,780</td>
<td>7,042</td>
</tr>
<tr>
<td>115</td>
<td>150</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>040</td>
<td>200</td>
<td>Conisbrough - Denaby</td>
<td>465 - 975</td>
<td>328</td>
<td>528</td>
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<tr>
<td>141</td>
<td>20</td>
<td>Bawtry</td>
<td>110</td>
<td>70</td>
<td>90</td>
</tr>
<tr>
<td>165</td>
<td>300</td>
<td>Carcroft - Skellow</td>
<td>300</td>
<td>7</td>
<td>307</td>
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<tr>
<td>777</td>
<td>66</td>
<td>Barnburgh - Harlington</td>
<td>60</td>
<td>0</td>
<td>66</td>
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<tr>
<td>929</td>
<td>80</td>
<td>Sprotbrough</td>
<td>95</td>
<td>0</td>
<td>80</td>
</tr>
<tr>
<td>1028</td>
<td>74</td>
<td>Tickhill</td>
<td>165</td>
<td>0</td>
<td>74</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1,002</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The Council has only sought to allocate Green Belt sites in areas which cannot otherwise meet their housing requirement via planning permissions or suitable non-Green Belt allocations. This has not been achieved in all areas. For example, in Mexborough it was not deemed that exceptional circumstances justified the release of the sites there, given the options available and the findings of the Green Belt Review (DMBC3 pages 80–83).

Green Belt is only proposed as a ‘last option’ when no other suitable sites exist in settlements which have allocations to help areas meet the spatial strategy. In many cases, sites have been ruled out for matters such as flood risk and access prior to Green Belt being considered.

The Green Belt Topic Paper (DMBC3) covers all matters in more detail, and the Green Belt Review (independently undertaken by Arup) shows how the sites scored in their individual Green Belt assessments (SDEB15.3.1/3.2/4). Details of the exceptional circumstances and maps for each individual site are provided in Appendix PQ8, which shows how a number of different matters accumulate in each case to justify exceptional circumstances for removing land from the Green Belt.

**PQ9.** Section 7.6 of the Green Belt Topic Paper\(^8\) seems to suggest that the creation of a country park and adding 19 hectares of land to the Green Belt south of the former Rossington Colliery would represent compensatory improvements to the environmental quality and accessibility of remaining Green Belt land to offset the harm that would be caused by the removal of other land from the Green Belt\(^9\). Paragraph 16.123 of the Plan refers to a new country park at Rossington “in accordance with the permissioned scheme” but does not refer to compensatory improvements to the Green Belt. (a) Should the Plan set out specific requirements for that proposal to ensure that it is effective in securing compensatory improvements in this part of the Borough? (b) Would that particular scheme provide effective compensation in relation to land to be removed from the Green Belt in other parts of the

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\(^8\) DMBC3.

\(^9\) NPPF 138.
Borough, for example at Conisbrough, Harlington, and Carcroft/Skellow, having regard to engagement with landowners and other interest groups?  

**Council response** - In relation to question (a), the Council would be agreeable to expanding paragraph 16.123 of Chapter 16, to include the following text (additional text shown in red) which could form the basis of a Main Modification to the plan.

"... reclaimed as a new country park in accordance with the permissioned scheme. The Green Belt in this location has been extended to cover the area of the country park, enhancing the Green Belt and securing Green Belt improvements including environmental and biodiversity enhancement, improved accessibility, recreational benefits, landscape and visual enhancements and the improvement and greening of degraded land. This also helps to compensate for the loss of Green Belt at other locations across the Borough."

Regarding question (b), whilst there is some Green Belt which is being removed at Rossington due to an area of land being developed as part of the planning permission for the Rossington Colliery redevelopment, the amount of land proposed to be brought into the Green Belt in Rossington is far greater than the Green Belt loss in this location.

A country park will not exclusively be used by local residents, and the benefits are wide ranging. As set out in the Green Belt Topic Paper (DMBC3), the Rossington country park will provide environmental and biodiversity improvements (including wildflower areas, woodlands, new hedgerows and wetland habitats as well as general greening of degraded land); enhanced accessibility in opening up previously private colliery land to the public with a network of paths and reinstatement of a lost bridleway; increased recreational opportunities as a result of making the land public; visual and landscape enhancements to improve this long degraded and industrialised landscape; and a new Green Belt boundary, which will conform to the built form of the adjacent housing site and reflect the eventual urban/rural edge in this location. Furthermore, whilst not currently in the Green Belt, bringing this site into the Green Belt will result in 19ha of new Green Belt land to help offset the overall loss of Green Belt in this location.

As such, the Council are satisfied that the compensatory improvements that this proposal offers comprises effective compensation for the overall loss of Green Belt across the Borough, and that the collective improvement this can make to the overall remaining Green Belt in the Borough is of a scale and quality which could not be replicated through more localised Green Belt compensatory improvements.

There is nothing in the NPPF or PPG that specifies that compensatory improvements must be local to the area where land will be removed from the Green Belt. However, the Council does recognise that there may be more localised improvements to the Green Belt which can be identified closer to the sites which are proposed for allocation, and which would require those bringing forward the sites for development to compensate the loss of Green Belt locally.

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10 PPG ID: 64-003-20190722.
and on a site by site basis, in addition to the already proposed Rossington country park.

As such, preliminary work has been undertaken in collaboration with the Council’s ecologists to assess how, through developer requirements, localised off site Green Belt improvements can be identified in addition to the compensatory improvements at Rossington, in order to enhance the case strength for Green Belt release.

Moving forward, this work may require the Council to liaise with private landowners in some circumstances in order to discuss specific improvements to certain sites. In other cases, it is anticipated that improvements could be made to Council owned land to either create biodiversity and environmental improvements, enhance access, and encourage full enjoyment of the Borough’s countryside. Initial work has been undertaken to identify potential sites and interventions which might form compensatory improvements, and further details can be provided on this ongoing work if necessary.

As per PQ10 (below), the Council is proposing that we will add a new developer requirement into the requirements for each site to be removed from the Green Belt (Sites 033; 040; 115; 141; 165; 777; 929; and 1028) requiring the site to contribute towards a qualitative improvements to remaining Green Belt land within the vicinity of the site. This ensures that, alongside the amendment to paragraph 16.123, compensatory Green Belt improvements are enshrined within the Local Plan.

**PQ10. Should the development requirements for any of the housing allocations set out in Appendix 2 of the Plan include specific reference to creating readily recognisable Green Belt boundaries and/or making compensatory improvements to the environmental quality and accessibility of remaining Green Belt land close to the site?**

**Council response** - The Council agrees that creating more readily recognisable Green Belt boundaries should be more strongly set out within the developer requirements for sites 033, 777, 929 and 1028. For other Green Belt allocations, boundaries will be clearly defined by existing infrastructure (040, 115, 165/186), and in the case of 141 will not require a Green Belt boundary, as this is an isolated area of Green Belt being fully removed and leaving no further Green Belt beyond it.

The Council therefore identifies the following suggested changes (additional text shown in **red**) to Appendix 2 that could form the basis of Main Modifications to the plan in relation to boundaries and also compensatory Green Belt improvements as set out in the answer to PQ9.

| Developer requirements – Site 033 (page 260). |
| Create a new section in the table: |
| **Title:** Compensatory Green Belt Improvements |
| **Body:** As the site allocation results in the loss of Green Belt land, this must be compensated for by contributing to improving the environmental quality and |
"The scheme should develop pedestrian and cycle connections through the site between Sheffield Road and Warmsworth Halt. Properties fronting Sheffield Road must be set back along similar building lines to the existing housing, with private drives to the front. The layout must ensure existing private boundaries are locked together on the eastern edge of the site to ensure security. Landscaped buffers should be included along the western and southern edges of the site to soften the settlement edge and provide a buffer between adjacent uses. In the interests of creating a new strong, defensible, and likely to be permanent Green Belt boundary in this location, a clearly defined site boundary should be formed to the western limit of the site, using suitably tall, dense and continuous hedgerow or tree planting. This could form the periphery to wider on site efforts to provide a visual softening between countryside and urban forms, or be used as plot boundaries, but must define the actual site limits in a clear and linear fashion."

Developer requirements – Site 040 (page 261)
Create a new section in the table:

<table>
<thead>
<tr>
<th>Title: Compensatory Green Belt Improvements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Body: As the site allocation results in the loss of Green Belt land, this must be compensated for by contributing to improving the environmental quality and accessibility of remaining Green Belt land within the vicinity of the site. Details of specific sites and projects will be established in discussion with the Council.</td>
</tr>
</tbody>
</table>

Developer requirements – Site 115 (page 265)
Create a new section in the table:

<table>
<thead>
<tr>
<th>Title: Compensatory Green Belt Improvements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Body: As the site allocation results in the loss of Green Belt land, this must be compensated for by contributing to improving the environmental quality and accessibility of remaining Green Belt land within the vicinity of the site. Details of specific sites and projects will be established in discussion with the Council.</td>
</tr>
</tbody>
</table>

Developer requirements – Site 141 (page 267)
Create a new section in the table:
Title: Compensatory Green Belt Improvements

Body: As the site allocation results in the loss of Green Belt land, this must be compensated for by contributing to improving the environmental quality and accessibility of remaining Green Belt land within the vicinity of the site. Details of specific sites and projects will be established in discussion with the Council.

Developer requirements – Site 165 / 186 (page 272)

Create a new section in the table:

Title: Compensatory Green Belt Improvements

Body: As the site allocation results in the loss of Green Belt land, this must be compensated for by contributing to improving the environmental quality and accessibility of remaining Green Belt land within the vicinity of the site. Details of specific sites and projects will be established in discussion with the Council.

Developer requirements – Site 777 (page 294).

Create a new section in the table:

Title: Compensatory Green Belt Improvements

Body: As the site allocation results in the loss of Green Belt land, this must be compensated for by contributing to improving the environmental quality and accessibility of remaining Green Belt land within the vicinity of the site. Details of specific sites and projects will be established in discussion with the Council.

Under design, amend to:

"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. 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. In the interests of creating a new strong, defensible, and likely to be permanent Green Belt boundary in this location, a clearly defined site boundary should be formed to the southern limit of the site, using suitably tall, dense and continuous hedgerow or tree planting. This could form the periphery to wider on site efforts to provide a visual softening between countryside and urban forms, or be used as plot boundaries, but must define the actual site limits in a clear and linear fashion. The design of the southern boundary will also need to take account of the electricity pylons and the required stand-off needed."

Developer requirements – Site 929 (page 299).
Create a new section in the table:

Title: Compensatory Green Belt Improvements

Body: As the site allocation results in the loss of Green Belt land, his must be compensated for by contributing to improving the environmental quality and accessibility of remaining Green Belt land within the vicinity of the site. Details of specific sites and projects will be established in discussion with the Council.

Under design, amend to:

"New development should front toward Cadeby Road and Melton Road with building set back to reflect existing street frontages and building lines. New homes should provide surveillance over the open space to the east through properties fronting toward it set back behind private drives and any retained trees / hedgerows. Pedestrian and cycle connections should be provided between Melton Road and Cadeby Road and the open space. The layout should be informal, and include enhanced landscape planting, to the western edge of the site to soften this aspect of the site's edge within the wider landscape. In the interests of creating a new strong, defensible, and likely to be permanent Green Belt boundary in this location, a clearly defined site boundary should be formed to the western limit of the site, using suitably tall, dense and continuous hedgerow or tree planting. This could form the periphery to wider on site efforts to provide a visual softening between countryside and urban forms, or be used as plot boundaries, but must define the actual site limits in a clear and linear fashion."

Developer requirements – Site 1028 (page 302).

Create a new section in the table:

Title: Compensatory Green Belt Improvements

Body: As the site allocation results in the loss of Green Belt land, this must be compensated for by contributing to improving the environmental quality and accessibility of remaining Green Belt land within the vicinity of the site. Details of specific sites and projects will be established in discussion with the Council.

Under design, amend to:

"New development should incorporate appropriate stand-off from the Motorway edge and include noise attenuation measures. If open space is to be provided it may be appropriate to locate POS along this edge. Rear gardens of new homes should back onto existing rear gardens to the north and west in a secure layout. Properties should front southward in an outward looking arrangement with landscape buffering along the southern edge to soften the settlement edge adjacent the countryside. In the interests of creating a new strong, defensible, and likely to be permanent Green Belt boundary in this location, a clearly defined site boundary should be formed to the southern limit of the site, using suitably tall, dense and continuous hedgerow or tree planting. This could form the periphery to wider on site efforts to provide a visual softening between countryside and urban forms, or be used as plot boundaries, but must define the actual site limits in a clear and linear fashion."
Additionally, an amendment to the developer requirements for design are also proposed for site 247 (page 275), to read:

"Further development to the south of the permitted Rossington Colliery development / Torne Park must ensure integration with the approved illustrative masterplan and design code for the area to the north. These documents and plans must be updated and accompany the submission of any planning application for this site (247). The layout for this area must ensure housing is locked together with the proposed housing to the north to create a secure block structure. Landscaped pedestrian and cycle links will need to be created through the site to link the permitted Torne Park housing area to the proposed country park to the south. Preferably this will be a continuation of the route provided adjacent to the drain. New housing along the southern boundary of the site should integrate with and front southward toward the country park. Housing should be set away from Holmes Carr Wood with appropriate separation distances between new development and the woodland. The southern site boundary will be delineated by the point at which the new development platform meets the sloping hill, however, in the interests of creating a new strong, defensible, and likely to be permanent Green Belt boundary in this location, opportunities should be explored for enhancing this and forming a clearly defined site boundary, using suitably tall, dense and continuous hedgerow or tree planting. This area could also incorporate footpaths which link the site to the country park."

In summary, the Council agree that matters highlighted in PQ10 need to be more clearly set out to ensure that strongly defined resultant boundaries and further localised compensatory improvements are delivered, and proposed to amend the developer requirements accordingly to ensure this, as well as paragraph 16.123 in relation to ensuring the compensatory improvements of Rossington country park (PQ9).

**Flood Risk**

**PQ11. Are any of the allocations in the plan wholly or partly in flood zones 2 or 3 such that an exception test is required by national policy and guidance? If so, please list all allocations, the flood zone, uses proposed, and a brief summary of the justification for the proposal in terms of the sequential and exception tests. For any sites that require an exception test to comply with national policy requirements, please summarise how parts (a) and (b) of NPPF 160 have been passed.**

**Council response** – There are a number of planning permissions in FZ2/3 that can be included in the borough’s land supply. Housing sites with detailed planning permission (and non-major development) are, by the NPPF’S definition, deliverable so long as there is no clear evidence to the contrary. These sites will be safe in line with the mitigation measures as per their Flood Risk Assessments. In terms of ‘new allocations’ (Employment Sites – Policy 5 & Table 4 and Housing Sites – Policy 6 and Tables H2(A-Q)) any which are wholly or partly in FZ2/3 are set out in the summary table at Appendix PQ11, including whether the exception test is required. The table also summarises how parts (a) and (b) of NPPF para 160 have been met (i.e. that the exception test has been passed) where identified as being required.
PQ12. Policy 58 part C confines the sequential test area of search for housing, business and industrial development on windfall sites to the settlement in question. The allocations for housing and economic development in the Plan are intended to meet identified needs and are based on a spatial strategy that concentrates growth at the larger settlements with remaining growth delivered elsewhere to support the function of other sustainable settlements and to help to meet more local needs\(^\text{11}\). So what is the justification for potentially allowing housing, business and industrial development on windfall sites in areas of high flood risk when such development may not be necessary to meet identified needs and sites at lower risk of flooding may be available elsewhere in the Borough?

**Council response** - The Council’s justification for the approach of Policy 58, and in particular part C, is set out in Appendix 2 of the Flood Risk Topic Paper (DMBC2). The approach very much replicates that of the Council’s existing Development & Flood Risk SPD (October 2010) which was introduced following the major flooding events of June 2007 where large areas of the Borough were affected, and the subsequent changes to national planning policy with the publication of PPS25 & supporting Practice Guidance.

The approach through the SPD was worked up in conjunction with the EA and the original guidance note that the Council adopted (prior to formalising into the SPD) was identified as an example of best practice in the Government’s PPS25 Development & Flood Risk Practice Guide (Updated December 2009\(^\text{12}\)). Under the section entitled ‘Applying the Sequential Test for individual planning applications’ the approach identified Doncaster as “an example of successful local application of the Sequential Test”.

”Doncaster Council’s Forward Planners worked closely with the Environment Agency to produce their 'Flood Risk Policy Guidance Note’ to aid Sequential Test implementation. The note has been approved by Council members and has been afforded weight by the Planning Inspectorate in a number of dismissed appeals. The note is a ‘living document‘ to allow for improvements to be made, but will eventually be translated into an Supplementary Planning Document. The note clarifies how national guidance on the Sequential Test will be applied to the Doncaster area. It resolves common queries about when and where it must be applied, who has responsibility for undertaking it, and how it will be applied for common development types. The note has promoted understanding and consistency between Local Authority Development Control Officers, given applicants a better idea of what to include in their applications, and given developers greater certainty, early in the process, about whether their development is likely to pass the Sequential Test or not. Ultimately, it has resulted in a number of developments being successfully steered away from flood risk areas.” (Source: CLG – 2009 - PPS25 Practice Guide - pg.91)

The Council, with support from the EA, consider the approach through policy 58 part C is still justified as well as being a ‘tried and tested’ approach. NPPF (2012 and Revised 2018/2019 and supporting PPG) retains the policy thrust of PPS25 and PPG25 with the sequential approach to avoidance where possible. Policy 58

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11 Plan paragraph 4.6.
ensures national policy requirements in respect to sequential testing is complied with, whilst reflecting both the relatively unique flood risk constraints of the Borough, as well as the size of the Borough and the variety of its dispersed settlements. Some of the largest settlements are located where they are due to the coal-mining legacy. Many communities are still experiencing challenges linked to the post-industrial decline of this once very important sector of the borough’s economy.

The borough itself is the largest metropolitan borough in England and covers an area of 226 square miles. Over two-fifths of the Authority’s area is FZ2/3 with a significant concentration in the northeast ‘quarter’ of the Borough, in particular at Main Towns such as Thorne-Moorends. In addition, large parts of Doncaster Town Centre, including key town centre mixed use regeneration areas, and the wider Main Urban Area are at residual risk of flooding. Applying a ‘borough-wide’ area of search will not achieve many of spatial planning’s wider objectives for some communities which must consider flood risk avoidance against the full host of Planning considerations at a scale smaller than the Borough itself.

The approach is a balance between the need to avoid flood risk where possible, but acknowledging the need for regeneration, utilising brownfield sites, efficient use of land, minimising urban sprawl into the Countryside, delivering affordable housing, bringing forward development close to existing services and facilities, and so forth. Without adopting such an approach some parts of the borough risk being left to ‘wither on the vine’ and/or stagnating large tracts of derelict post-industrial land with all the associated urban social issues that ensue.

The Flood Risk Topic Paper (DMBC2) justification (Appendix 2) identifies the following in particular:

**Housing, Business & General Industrial (B1 & B2) – Area of Search elsewhere in same settlement**
- The Local Plan identifies a sustainable settlement hierarchy which by its very nature sets out the most sustainable locations for new development which have the best access to services and facilities, including public transport and reducing the need and dependency for travel by modes such as private car;
- The overall approach of the Local Plan has been subject to a robust Sustainability Appraisal process;
- Although allocations have been made to meet the plan period development need, NPPF is clear that housing supply should be boosted so these are minima rather than ceilings;
- Some of the settlements have a housing growth range where the top of the range has not been met (for example Thorne-Moorends) and Neighbourhood Plans may be looking to allocate for more growth than the local plan in line with NPPF/PPG, and/or alternatively windfall development will help meet the top of the range over the course of the plan period in some of the borough’s settlements that are otherwise very sustainable locations;
- Although sufficient allocations have been identified for the plan period’s development need without relying on windfall sites, the 5-Year Housing Land Supply statement does make a windfall allowance and this forms an important source of additional supply to help ensure a 5-year supply can be demonstrated throughout the plan period. Failure to be able to show a deliverable housing supply will result in the tilted planning balance being
triggered with an increase in speculative applications not in accordance with the local plan spatial strategy and at odds with NPPF’s development-plan led approach;

- NPPF is clear of the need to ensure efficient use of land and infilling and development on windfall sites ensures that such sites, many also being brownfield, can be redeveloped and often be an improvement in terms of flood resistance and resilience than the existing use(s);
- Efficient use of land and infilling also helps support the vitality and viability of existing centres and sustain services;
- Windfall sites often provide opportunity for mixed use developments where less vulnerable uses such as retail and offices can/are often directed to ground floor with more vulnerable residential uses above;
- More vulnerable housing uses still have the ‘safety net’ of the exception test to comply with which must demonstrate that the development will be safe for its lifetime and not increase flood risk elsewhere thus applications can still be refused on this part should the development ultimately not be considered as appropriate/safe/mitigating risks;
- In terms of employment, then these are identified as less vulnerable uses in flood risk areas;

**Offices - Area of Search elsewhere within the Town Centre where the development is being proposed**

- Offices are proposed to be predominately within Doncaster town centre but also within other town centres (Mexborough and Thorne), and Doncaster Sheffield Airport (aviation related uses) and Local Centres;
- A separate (town centre uses) sequential test will be required for town centre uses including offices to ensure the vitality of town centres;
- The Local Plan identifies a town centre boundary which reflects the Town Centre Masterplan as endorsed by the Council’s Executive.

**Retail – Area of Search elsewhere within the settlement’s town/district/ local centre or where a settlement does not have a retail area defined on the Policies Map, elsewhere within the same settlement as per the proposal**

- Retail uses are required to be directed to existing centres to ensure vitality and viability of our centres in an era of ever changing retail habits with a shift to online shopping;
- Directing such uses to existing centres supports wider Planning and sustainability objectives such as tending to be places with the greatest level of accessibility and ability to support multi-purpose and linked trips;
- Supporting town centres generates local employment, promotes beneficial competition and creates attractive, healthier and safer centres.

**Mixed-use**

- Needs to justify scheme should be considered as a single proposal or otherwise separate out uses and in line with the above

**All other proposals**

- Normally a borough-wide search unless a case can be made to narrow due to certain locational needs of the development or specific catchment requirements.
- This is the opening stance taken through national planning policy, although the policy does allow for an individual justification to be made to reflect truly geographical or locational needs of development, for example
a clear catchment such as a new fire or ambulance station that has a set
emergency response time to abide by.

It is noted that there have been no representations raising any soundness issues
in respect to Policy 58. There are however representations, for example Thorne
& Moorends Town Council, whom identify dissatisfaction with the limited scale of
allocation to the settlement relative to the town’s size, population and wider
sustainability credentials due to the spatial strategy’s approach of avoiding flood
risk. The emerging Neighbourhood Plan also has an aspiration for more
development than that set out in the local plan, and acknowledges that this will
require sites at risk of flooding, but well protected by existing defences.

The EA are of course very well versed in the day-to-day determination of
applications in the Borough, including sites in FZ2/3 as a statutory consultee to
the Development Management process. As noted, the EA have confirmed post
Regulation 19 that they support the approach as being justified so long as
suggested changes are considered to the current policy to remove the less
sustainable Defined Villages whereby the borough-wide area of search would be
required; the Council agrees with this. This change would also make the policy
more consistent with policies 2/3 and the Defined Villages in the Countryside
‘half’ of the Borough where the policy is clear that the cumulative growth limit
does not apply to sites/applications that are medium-high flood risk. The EA
have now signed the SoCG (CSD13), in particular Agreement 12 which relates to
flood risk, with the relevant extract from page 32 as follows.

Flood risk (ref 12)

72. Flood risk is a major issue for Doncaster as 43% of the borough is within
Flood Zone 2 or 3. As a result of this, there has been regular on-going
consultation and engagement with the Environment Agency. This has resulted
in their involvement throughout the evolution of the Local Plan as their
comments and suggestions have been considered and incorporated in to the
policies and the Flood Risk Topic Paper. This joint working has ensured that
the Local Plan complies with national guidance regarding flooding and has
guided where development can take place but also has regard to the
regeneration needs of the borough.

73. While preparing the Strategic Flood Risk Assessment Level 1, the Council’s
consultants JBA shared the evidence base and data with neighbouring
authorities, utility companies and bodies such as the Canals and Rivers Trust.
Any comments and issues were incorporated into the work at the earliest
stage and no further issues have been raised throughout the process.

Agreement 12: Doncaster Council will continue to liaise with the Environment
Agency and neighbouring authorities where necessary. Hydraulic Modelling
evidence will be kept under review and an update to the Level 1 Strategic Flood
Assessment will be considered and then a more detailed level 2 Assessment may
follow on.

The following suggested change to Policy 58 part C is therefore proposed to
address the EA’s outstanding response that the policy should be stricter in
respect to the sequential test for proposals at the Defined Villages (new text
shown in red).
C) All windfall development proposals outside of Development Allocations in Flood Zones 2 and 3a will be supported as follows:

*Housing; and business and general industrial (B1 & B2 use classes)* for proposals at tiers 1 to 3 of the settlement hierarchy (as defined by Policy 2): will be required to pass a sequential test with an area of search normally confined to elsewhere within the same settlement.

In conclusion, the justification for applying the Council’s sequential test area of search as per Policy 58 part C has been set out above, and in the Flood Risk Topic Paper (DMBC2). In brief, it is an approach that strikes an appropriate balance between national policy objectives of avoiding flood risk where possible, with the plethora of other spatial planning objectives and delivering sustainable development in a borough such as Doncaster with its own relatively unique set of circumstances, constraints and challenges. The policy seeks to bring forward sites at lowest risk of flooding, if such options are reasonably available, first and foremost elsewhere at the same settlement as opposed to elsewhere in the borough that extends to 225 square miles. Although sufficient allocations are being made through the plan to meet the borough’s development needs over the plan period, these are minimums as opposed to ceilings in line with NPPF’s objective of boosting supply.

Given applications that do not pass the sequential test should normally be refused, a borough-wide approach to the sequential test may completely render some otherwise very sustainable sites and proposals from coming forward purely because of their initial coarse categorisation as being FZ2/3. The Exception Test and Flood Risk Assessment policy requirements, in consultation with the EA and Lead Local Flood Authority as part of the Development Management stage, provides the ‘safety net’ to refuse any proposals that will not be safe for their lifetime, and/or increase flood risk elsewhere. This approach is a far more positive and pragmatic one to pursue as it allows for a more detailed and informed discussion around ‘residual’ flood risk to sites given most of the borough is already well defended by existing defences, which the EA Flood Map for Planning does not take into account. The Council’s experience over recent years is that ‘residual’ flood risk(s) can often be mitigated to a satisfactory level (including factoring in climate change allowances), and sites still found to be viable, as part of a multi-disciplinary approach to development involving other professionals outside of Planning, such as Flood Risk Engineers and Architects.

**PQ13. Is the meaning of the statement in the sixth paragraph of policy 2 that development will be accommodated in flood zones where sites are safe or can be made safe clear, and is such an approach consistent with policy 58 and national policy?**

**Council response** – It is not the Council’s intention that this part of Policy 2 is intended to be used to circumnavigate either NPPF or Policy 58 in respect to flood risk. The Council accepts that, as drafted, this is not clear and suggest the following change which could form the basis of a Main Modification to the plan (with new wording identified in red).

*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. Other development will only be*
Spatial Strategy and Distribution of Growth

PQ14. Which specific parts of policy 2 make clear how a decision maker should react to a development proposal? What is the purpose of the other parts of policy 2?

Council response - Policy 2 is intended to encapsulate the Plan’s overall Spatial Strategy and Settlement Hierarchy.

Policy 2 is not wholly a development management policy but is part provided to explain the context for the Plan’s overall approach to how growth is to be provided for in the Borough. It gives the strategic context for how decisions have been made on where to locate development through site allocations. However, where considered key to implementation of the spatial strategy, and necessary to guide determination of individual development proposals, development management policy is also given.

The ‘Overall Strategy’ part of Policy 2 is a summary of the Plan’s Strategy. It does not give specific development management policy but sets the strategic context for key policies of the Plan which decide the level and distribution of growth and for specific uses such as housing, employment, retail, leisure, office, cultural and tourist developments.

The ‘Settlement Hierarchy’ part of Policy 2 elaborates further on how the overall strategy should be implemented. It also introduces development management policy necessary for relevant ‘levels’ of the hierarchy.

Parts 1, 2 and 3 of the Settlement Hierarchy refer to the support that will be given to development in “appropriate locations” (as defined) on non-allocated sites within the development limits of the ‘Doncaster Main Urban Area’, ‘Main Towns’ and ‘Service Towns and Villages’ respectively. These parts state which settlements are relevant to each of the top levels of the hierarchy.

Part 4 provides policy for development within the Defined Villages and lists the relevant villages. To avoid repetition of national policy, reference is made to NPPF policy for non-residential development.

Part 5 provides policy for the area designated as ‘Countryside’ as defined. In recognition of NPPF policy on ‘rural housing’ (paragraphs 77-78) and ‘supporting a prosperous rural economy’ (paragraphs 83-84), development management policy is given which should be read in conjunction with the development management considerations given in Policy 26.

The second part of Part 5 of Policy 2 provides policy for the situation where a five-year borough-wide deliverable supply of housing cannot be demonstrated. This is to provide flexibility and to retain a degree of plan-led “control” over the location of development in these specific circumstances.

The last part of Part 5 of Policy 2 applies to land in the (defined) “Countryside” adjacent to 14 Defined Villages which is to be read in conjunction with the
relevant part of Policy 3. This is also development management policy. (See also answer to PQ16).

Part 6 of the Policy gives the Local Plan’s Green Belt development management policy, which gives almost total deference to the NPPF. Local interpretation of the meaning of “infill development”, in the context of NPPF paragraph 145e, is the only development management policy considered necessary to include in the Local Plan.

The footnotes to Policy 2 (labelled as *, ** and ***) assist implementation of the relevant parts of the development management policy.

If the Inspector is of the opinion that the clarity of Policy 2 should be improved to highlight the specific parts that a decision maker should use to react to a development proposal, it is proposed that the following Main Modifications should be made:

- Delete the title prior to Paragraph 4.5: “Spatial Strategy, Settlement Hierarchy and Growth Targets”.

- Amend Paragraph 4.5 to read as follows (included in a text box and formatted as per the Local Plan Vision given on pages 14 and 15 of the Local Plan) and titled “Spatial Strategy”:

  **Spatial Strategy**

  Doncaster’s spatial strategy seeks to concentrate growth at the larger settlements of the Borough, making the most of existing services and facilities and delivering new development to where it is most needed. Remaining growth is delivered elsewhere in the Borough to support the function of other sustainable settlements and to help meet more local needs. Policies 2 and 3 set out the overall strategy, the supporting settlement hierarchy and the levels and distribution of the anticipated growth.

  **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.**

  Development should help create and maintain strong, sustainable, cohesive and inclusive communities, making the most effective use of previously developed land (except where that land is of high environmental value) and the best use of key transport corridors and existing infrastructure, enabling people to access jobs, services and facilities locally.

  **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’).**
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’.

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. Other development will only be accommodated in flood zones where sites are safe or can be made safe.

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.

Major new employment sites will be focused in locations accessible from the ‘Main Urban Area’ and ‘Main Towns’ at locations attractive to the market with good access to the Strategic Transport Network as well as Doncaster Sheffield Airport.

Retail, leisure, office, cultural and tourist developments will be located according to a ‘Network of Centres’ based on a ‘Sub-Regional Centre’; 2 ‘Town Centres’; 9 ‘District Centres’ and a number of ‘Local Centres’ and ‘Neighbourhood Shopping Parades’ (see Table 2). Proposals will be supported which protect and enhance their vitality and viability and minimise unsustainable trip generation. Mixed-use developments (including housing and other uses such as small-scale shops and leisure services) will be actively encouraged in and around town and district centres and other areas of good public transport accessibility. Within local centres and neighbourhood shopping parades a degree of flexibility in the mix and range of uses and activities which can be permitted will be allowed, whilst securing adequate protection of the existing retail function.”

- Re-name Policy 2 as “Settlement Hierarchy (Strategic Policy)”.
- Delete the following sub-titles from Policy 2: “Overall Strategy” and “Settlement Hierarchy”.
- Amend policy text prior to “1) Doncaster Main Urban Area” to read:

  “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.

  Development should help create and maintain strong, sustainable, cohesive and inclusive communities, making the most effective use of previously developed land (except where that land is of high environmental value) and the best use of key transport corridors and existing infrastructure, enabling people to access jobs, services and facilities locally.”
Decisions on the location and scale of development should be informed by Doncaster’s Settlement Hierarchy as set out below which should be read in conjunction with Policy 3: Level and Distribution of Growth.

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’).

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’.

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. Other development will only be accommodated in flood zones where sites are safe or can be made-safe.

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.

Major new employment sites will be focused in locations accessible from the ‘Main Urban Area’ and ‘Main Towns’ at locations attractive to the market with good access to the Strategic Transport Network as well as Doncaster Sheffield Airport.

Retail, leisure, office, cultural and tourist developments will be located according to a ‘Network of Centres’ based on a ‘Sub-Regional Centre’; 2 ‘Town Centres’; 9 ‘District Centres’ and a number of ‘Local Centres’ and ‘Neighbourhood Shopping Parades’ (see Table 2). Proposals will be supported which protect and enhance their vitality and viability and minimise unsustainable trip generation. Mixed-use developments (including housing and other uses such as small-scale shops and leisure services) will be actively encouraged in and around town and district centres and other areas of good public transport accessibility. Within local centres and neighbourhood shopping parades a degree of flexibility in the mix and range of uses and activities which can be permitted will be allowed, whilst securing adequate protection of the existing retail function.

Development limits have been drawn around the Doncaster ‘Main Urban Area’, ‘Main Towns’, ‘Service Towns and Villages’ and the ‘Defined Villages’. Within development limits, proposals for new development will be supported provided it accords with both the Settlement Hierarchy and other policies in the Local Plan.”

PQ15. What is the purpose of the table in policy 3 that sets out the distribution of growth? (a) Is it to explain and justify the distribution proposed through allocations in the Plan? Or (b), is it intended to make clear how a decision maker should react to a development proposal?
**Council response** - The table in Policy 3 which sets out the distribution of growth is primarily provided to explain and justify the distribution of growth proposed through allocations in the Plan.

However, the figures provided for the number of homes in ‘Doncaster Main Urban Area’, the ‘Main Towns’ and the ‘Service Towns and Larger Villages’ also provide a context for development management decisions in terms of assessing overall need for housing in a particular settlement. The figures given would become relevant to assessing individual planning applications where, for example, delivery of housing in an individual settlement was shown to be significantly exceeding or under-achieving the Local Plan settlement ‘target/requirement’. In such situations, this would inform planning decisions balancing housing need against other factors such as compliance with other Plan policies and harm to/benefit from other material considerations.

The latter part of Policy 3 which is relevant to 14 Defined Villages which are surrounded by ‘Countryside’, as defined in Part 5 of Policy 2, is development management policy to be read in conjunction with the last part of Part 5 of Policy 2. This is relevant where, in exceptional circumstances (as defined in Policy 2), and subject to the demonstration of clear local community support (as defined in Policy 2), residential development in appropriate locations (as defined in Policy 2) may be supported in the ‘Countryside’ on land adjacent to the development limit of a Defined Village.

**PQ16.** The last part of part 5 of policy 2 allows residential development on land in the countryside adjacent to the development limit of Defined Villages in certain circumstances. (a) Is this intended to apply to those Defined Villages that are surrounded by Green Belt? (b) If so, is that consistent with national policy? (c) If not, should this be made clear in the Plan?

**Council response** - Part 5 of Policy 2 applies to the area defined as “Countryside” in the opening sentence to part 5 – note the capital “C” which is used throughout the Local Plan when referring to this designated area (as opposed to the more generic use of the term “countryside” elsewhere in the Plan). Relevant explanatory text is also included in paragraph 4.10. The last part of part 5 of Policy 2 therefore, by definition, does not apply to Defined Villages which are surrounded by Green Belt. To assist implementation of the Policy, it is proposed that a Main Modification be made to Part 5 of Policy 2 to replace the term ‘Countryside’ with ‘Countryside Policy Area’. This also requires consequential amendments to all other references to ‘Countryside’ throughout the Local Plan and on the Policies Map.

**PQ17.** (a) Are the “size limits for an individual scheme/site” and “growth limits” set out in policy 3 for 14 of the 40 Defined Villages listed in policy 2 intended to be used by decision makers when reacting to development proposals in those settlements and/or adjacent to their development limits? (b) Paragraphs 4.5.7 to 4.5.12 of the Green Belt Topic Paper indicate that figures are provided only for the Defined Villages that are not surrounded by Green Belt. If that is so, should it be made clear in the Plan?
**Council response** - The last part of Part 5 of Policy 2 is development management policy to determine development proposals. The rationale behind the policy is to afford some limited flexibility in supporting small-scale growth (expansion beyond development limits) of the Borough's smallest settlements where remaining infill opportunities within development limits are now limited, in number and extent, following developments implemented since adoption of the Unitary Development Plan. However, the policy prevents inappropriate development of the Countryside via the safeguards imposed by the quantitative limits in the table of Policy 3 and the qualitative criteria of the last part of Policy 2 Part 5 – including the need to demonstrate ‘exceptional circumstances’ (as defined), ‘clear local community support’ (as defined) and in ‘appropriate locations’ (as defined).

It only applies to land adjacent to the development limit of a Defined Village surrounded by Local Plan designated Countryside – as explained in answer to PQ16. This part of Policy is also clear that this only applies to those Defined Villages (which by definition are only those surrounded by Countryside) which have defined ‘size limits for individual schemes/sites’ or ‘cumulative village growth limits’ set out for the 14 relevant Defined Villages in Policy 3. This is discussed in the quoted paragraphs 4.5.7 to 4.5.12 of the Green Belt Topic Paper (DMBC3). As discussed in response to PQ16 it is proposed that a Main Modification be made to Part 5 of Policy 2 to replace the term ‘Countryside’ with ‘Countryside Policy Area’. As a consequential amendment to this, and to improve the clarity of Policy 3, it is proposed that a Main Modification be proposed to the final part of the table in Policy 3 to amend the title of the first column to read “Location: Defined Villages surrounded by Countryside Policy Area”.

All policies are intended to be read together and individual policies do not necessarily refer to each other (see Local Plan para 1.14). However, Policies 2 and 3 do specifically refer to one another in the case of the Defined Villages.

The table in Policy 3 for the 14 Defined Villages not surrounded by Green Belt applies to land adjacent to their development limits in the designated ‘Countryside’. As explained in the last paragraph of Policy 2 Part 5 (‘Countryside’) this is an exception to the policy approach otherwise applied to Countryside (via Policy 2 Part 5, Policy 26 and relevant national policy in the NPPF).

This ‘Countryside exception’ policy therefore does not apply to land within the Development Limits of the Defined Villages; policy for such areas is given in Policy 2 Part 4 – which states that proposals will be considered against other policies in the Plan (e.g. Policy 11 (Residential Policy Areas)). Therefore, it follows that the site and cumulative limits only apply to proposals on sites adjacent to (outside of) the development limits for these specific villages.

It is considered the Policy approach is sufficiently clear. However, if the Inspector considers further clarification is required, the following main modification is suggested (new text in **red** and deleted text struck through and in **black**):

...
Amend footnote 5 to Policy 3 to read:

"The growth limit has been derived by calculating the share of each Defined Village’s local needs. As in the settlement hierarchy the local needs in these areas have been reallocated to the Main Urban Area and Main Towns, there is no requirement to allocate land at these locations. However, in line with and subject to the caveats in Policy 2, some development may be permissible in the Countryside adjacent to the above villages locations, up to the cumulative growth limit and on sites up to the sizes specified in this table. Any delivery in such locations will be additional to the allocated supply, and not form part of it.”

Chapter 16: Spatial Proposals

PQ18. Other than policies 68 to 72, do any parts of chapter 16 materially alter or add to any of the policies in the Plan?

Council response - A deliberate decision was made to include Chapter 16 in the Local Plan as an intended user-friendly and accessible interpretation of how the Plan will affect the individual settlements of the Plan’s settlement hierarchy.

Local interpretation is achieved by giving some context for individual settlements (in terms of settlement profile, role and function) and by setting out the land-use proposals for housing and employment, as well as the area specific policies 68 to 72.

In terms of the land-use proposals, they add to Policy 4 (Employment Allocations), Policy 5 (Employment Policy Areas) and Policy 6 (Housing Allocations).

Chapter 16 lists the Employment Allocations with Planning Permission in Tables E1 to E8 as referenced in the explanatory text to Policy 4.

Chapter 16 lists the Housing Allocations with Planning Permission in Tables H1A to H1O; the Housing Allocations without Planning Permission in Tables H2A to H2Q; and the Reserve Development Sites in Tables H3A to H3E; as referenced in the explanatory text to Policy 6.

The Local Plan will have a wide and varied readership with differing levels of familiarity with the planning system and Local Plans. In particular, it was considered important that residents within the Borough could have access to a quick summary as to how their local area will be affected. Chapter 16, together with the Policies Map, are provided to help achieve this.

Nothing in Chapter 16 conflicts with the remainder of the Local Plan.

iPort, Rossington

PQ19. Table E4 and the Policies Map identify land west of West End Lane, Rossington (iPort) as an Employment Allocation with planning permission with a gross site area of 178.72 hectares, 158 hectares of which is expected to be developed in the Plan period. Paragraph 16.127 describes iPort as being one of the UK’s largest logistics developments including a rail freight intermodal container facility serving all UK ports and the channel tunnel. Paragraph 16.123 states that the site continues
to be washed over Green Belt reflecting the very special circumstances that supported its development as well as the site still being a long way from completion. (a) Is the site an Employment Allocation or an Employment Policy Area? (b) Given the size of the site, and the apparent national significance of the development proposed, would policy 4 or 5 provide an effective framework for determining planning applications that may be submitted during the Plan period in the context of national policy relating to development in the Green Belt?

**Council response** – In response to part (a), the iPort development is an Employment Allocation in line with Policy 4: Employment Allocations. Paragraph 4.60 (the explanatory text to Policy 4) states that “In addition to new employment allocations, the employment land requirement also includes some sites that have already been developed between 2015 and 2018 and others with planning permission. The following provides links to Tables E1-8 of Chapter 16 which lists the sites with planning permission”. The iPort planning permission is therefore listed in the Rossington section in Chapter 16 on page 224, Table E4.

In response to part (b), the outline planning permission (issued on 19 August 2011) granted permission for intermodal terminal and rail and road served distribution units in Use Class B8. Therefore the outline permission has established that there are very special circumstances which justify this specific development in the Green Belt. This covers the whole extent of the site including future phases. The Council supports uses which are envisaged in the outline permission, and expects reserved matters to come forward in line with this. Any uses which are not B8 and therefore not in line with the permission and the established rationale for ‘very special circumstances’ would need to be considered on their merits in line with national planning policy on Green Belt and any relevant policies in the Local Plan. These would not be for the very special circumstances established through the original permission, and therefore would need to justify their own reasons for any differing proposals needing to be in the Green Belt. The Council needs to ensure that this Green Belt development comes forward for the reasons established as necessary in the Green Belt, and as long as phases are in line with the outline and therefore the very special circumstances justification, there should be no concern about the delivery of this site, and reserved matters phases do not need to re-establish the very special circumstances agreed through the outline if they are in accordance with it.

Regarding the retention of iPort in the Green Belt, the Council’s position on planning permissions in the Green Belt is set out in the Green Belt Topic Paper (DMBC3) paragraph 5.3.7 onwards. This section states that the site will not be considered for removal from the Green Belt until an appropriate time to do so, following the completion of the development. Until the site is developed it is not possible to draw an accurate boundary. If the site remains partially undeveloped it makes it impossible to say where the most suitable or defensible boundary is. Also removal of land from the Green Belt could potentially result it being developed more freely for reasons other than those being assessed as contributing towards very special circumstances as set out above. Not removing the iPort from the Green Belt will not prejudice development in accordance with the outline in any way.

Chapter 16: Spatial Proposals of the Local Plan, includes iPort within Policy 4 and Policy 5. This should be corrected so iPort is only shown as an Employment Allocation (i.e. Policy 4) thus reflecting its circumstance as a planning permission (as shown in Table E4). Therefore it is proposed to amend paragraph 16.127 to
delete the reference to iPort and refer only to Bankwood Lane as follows (with additional text in red and deleted text struck through and in black).

**Employment Policy Areas (Policy 5)**

16.127. There is one are a number of existing employment sites including:

- **iPort** – one of the UK’s largest logistics developments including a rail freight intermodal container facility. This is of regional importance and provides freight services to all UK ports and the Channel Tunnel.
- **Bankwood Lane, Rossington.** Due to the opening of Great Yorkshire Way, this site now has excellent access to the motorway network and this will help it to realise its potential as an employment site.

For consistency, it is also proposed to amend Chapter 16 paragraph 16.158 for Askern so the Employment Policy Areas are accurately reflected to include all the existing employment sites and show that part of Askern Saw Mills has planning permission and is already included in Policy 4 as follows.

**Employment Policy Areas (Policy 5)**

16.158. Existing employment sites include:

- **Askern Saw Mills** – two small established employment sites supporting local businesses. Existing employment site with outline planning permission for a mixed use scheme including new units for employment uses which will serve the local area.
- **Selby Road** – two separate sites on either side of A19 supporting a regional company with some vacant land and a supermarket.
- **Askern Industrial Estate** – existing site with a mix of small units providing local jobs.

The Council suggests that both of these amendments could form the basis for Main Modifications to the plan to provide clarity and consistency in respect to allocated employment sites and existing employment designations.

**Housing Completions since 2004/5**

PQ20. Figure 16 in the Housing Topic Paper sets out net completions in the Borough each year between 2004 and 2018 and an average rate of 658 dwellings per year over that period. Evidence included in representations, based on Government statistics, includes significantly different figures, including an annual average of 1,013 net completions in the same period. Please clarify which figures are correct.

**Council response** - The figures quoted in the Housing Topic Paper (DMBC 4) are taken from historic findings in the Residential Land Availability report (RLA - the Council’s own annual monitoring of housing completions), and are accurate as per the historic findings within these. The figures quoted in the Pegasus representation on behalf of the Gascoigne Group are taken from MHCLG ‘Table

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13 DMBC4.
14 Table 4.1 on page 6 of the Pegasus Group representation on behalf of Gascoigne Group Ltd.
122: housing supply, net additional dwellings, by local authority district, England 2001-02 to 2018-19’.

The Council has reviewed this information and also liaised with MHCLG about the returns, and believe there are issues in using these data in the manner they have been used in the representation. The Council believes that the only way to accurately use Table 122 is to reflect the whole dataset, including the period 2001–04.

For the years 2001–11, the figures originally provided have been corrected for Doncaster by MHCLG by 365 units every year from the original figures, to make the numbers in this timeframe reflect the difference in dwellings between the 2001 and 2011 censuses and correct the annual returns to make the total additional dwellings for the period 2001–11 equate to the 2011 census findings (so Census 2001 + annual net additions estimates’ = Census 2011 dwelling count). This has been done for every local authority.

In not reporting what the years 2001–04 report, the representation misses the following returns as summarised in Table PQ20a below.

Table PQ20a: Extract from MHCLG Table 122: Housing Supply – Net Additional Dwellings by Local Authority District – England – 2001-02 to 2018-19

<table>
<thead>
<tr>
<th></th>
<th>2001-02</th>
<th>2002-03</th>
<th>2003-04</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>335</td>
<td>1,745</td>
<td>-2,285</td>
</tr>
</tbody>
</table>

Two of the first three years show significant deficits, and although trying to replicate the years shown in the Housing Topic Paper, (DMBC4 - 2004 onwards), the Council believes that it is inaccurate to omit these from the source. Only using 2004 onwards is problematic when calculating averages as it shows inaccurately high figures which would otherwise be tempered by the first three years figures, if averaged out over 10 years (as required due to the census correction), rather than 7 years – or 766 dpa (2001–11) instead of 1,013 dpa (2004–11). The totals for years 2004–2011 are actually higher than the overall difference in housing between 2001 and 2011 (and therefore between censuses) according to Table 122.

On an annual basis, the dataset has some notable issues for years 2001-2011. Firstly, in the years 2004–05, 2005–06 and 2007–08, the Council did not provide a return and so the figures are imputed by MHCLG. Secondly, for the years 2001–04, MHCLG estimated the figures.

It is not useful to read the years 2001–11 in annual terms given the above, rather the Council believes you should simply calculate the total dwellings recorded between the 2001 and 2011 census (7,659 dwellings, according to Table 122), or an average of 766 dwellings per annum. This gives the most accurate understanding of housing delivery in Doncaster in this period when using this table.

15 From MHCLG: “In previous years, as a basis for imputation the ratio of the number of house building completions on quarterly Local Authority house building returns (P2) to the net additions figure was calculated at regional level, using data from all local authorities that finalised their HFR return. For local authorities which failed to submit a HFR return this ratio was applied to the number of house building completions reported on their P2 quarterly house building returns for the financial year.”
The return also notes that following the 2021 census, the numbers for 2011–21 will also be corrected to account for the actual difference as per the censuses. However, the Council believes that there are some issues with the figures provided up to 2018, which can be corrected using subsequent accurate RLA findings, as set out in Table PQ20b below.

**Table PQ20b: Comparison of MHCLG Table 122 & Doncaster Council’s Annual Housing Monitoring Reports 2011-12 to 2017-18.**

<table>
<thead>
<tr>
<th>A - Year</th>
<th>B - Table 122</th>
<th>C - RLA correction</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011 - 12</td>
<td>457</td>
<td>440</td>
</tr>
<tr>
<td>2012 - 13</td>
<td>316</td>
<td>349</td>
</tr>
<tr>
<td>2013 - 14</td>
<td>654</td>
<td>693</td>
</tr>
<tr>
<td>2014 - 15</td>
<td>792</td>
<td>881</td>
</tr>
<tr>
<td>2015 - 16</td>
<td>1,162</td>
<td>1,025</td>
</tr>
<tr>
<td>2016 - 17</td>
<td>1,049</td>
<td>1,049</td>
</tr>
<tr>
<td>2017 - 18</td>
<td>1,208</td>
<td>1,137</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>5,638</strong></td>
<td><strong>5,574</strong></td>
</tr>
<tr>
<td>Difference (B - C)</td>
<td></td>
<td>-64</td>
</tr>
</tbody>
</table>

If you add the total in column C to the difference between the 2001 and 2011 census, then the total 2001–2018 housing completions are 13,233, or a 17-year average of 778dpa – remarkably similar to the annual average of 766dpa in years 2001–2011.\(^\text{16}\) Therefore, using the data that the Council has published in its RLAs, the average figure of 658dpa for the years 2004 - 2018 provided in the Housing Topic Paper (DMBC4) is correct. However, if using MHCLG Table 122 all the way back to 2001 (as the Council believe it should be used), and amend the as yet to be census confirmed data from 2011 onwards with the Council’s corrected RLA data for this time, the average figure increases to 778 dwellings per annum (2001 – 2018). This is somewhat lower than the 1,013 dpa figure suggested in the representation, which does not account for the aforementioned issues with MHCLG Table 122.

**Housing Requirement**

**PQ21.** Policy 3 states that the strategic aim is to facilitate the delivery of 18,400 new homes in the period 2015-2035 (920 per year) and refers to a need for 820 dwellings per annum once supply in the years 2015-2018 is deducted from the overall requirement. Paragraph 4.38 refers to local housing need based on the standard method being 585 homes per year, and to a objectively assessed need for housing of 912 homes per year once economic growth is taken into account. National policy requires strategic policy making authorities to establish a housing requirement figure for their whole area\(^\text{17}\). Please clarify what the housing requirement is for the period 2015 to 2035 (total number of dwellings and annual average).

**Council response** - The housing requirement for the plan period (2015-2035) is a range being: 11,700 (20 years x 585dpa) - 18,400 (20 years x 920dpa) dwellings.

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\(^{16}\) If you rely solely on the figures in the table for 2001–2018, the average is 782dpa.  
\(^{17}\) NPPF 65.
When delivery in the first three years of the plan period (3,400 net units between 2015 and 2018) is deducted, the residual net requirement for the years 2018–2035 is 8,300 - 15,000 dwellings (or 488dpa-882dpa).

As set out above, the housing requirement is expressed as a range. At the point the local plan was being prepared the range was 585dpa–920dpa. The 585dpa ‘bottom of the range’ figure represented Local Housing Need (LHN) as calculated via the Government’s standard methodology at the point of assessment in early 2018. The 920dpa ‘top of the range’ figure includes the economic uplift (rounded up from the actual figure of 912dpa) as established in the Economic Forecasts and Housing Needs Assessment (SDEB44).

The bottom end of the range is expressed narratively (as opposed to an actual figure being specified) as it is the LHN figure as calculated through the Government’s standard methodology. This will be recalculated each year throughout the plan period. For this reason, the Council has resisted inserting a figure into the policy given it would, and already has, become out-of-date. See response to PQ23 as to why the Council considers this is justified, and not problematic. In fact in the current uncertain climate in respect to Covid-19, the Council believes this provides much needed flexibility to help deal with the inevitably uncertain times ahead as alluded to in our preamble to the PQs.

A brief summary of how the plan has derived at its housing requirement range is set out in the Housing Topic Paper (DMBC4), in particular section 4.1, with greater detail in the respective evidence base, such as SDEB44.

PQ22. The “baseline growth” figure of 585 homes per year referred to in paragraph 4.38 of the Plan is derived from the 2014-based household projections. Evidence has been submitted that indicates that the population assumptions include in those projections may be unrealistically low\(^1\). Other submitted evidence indicates that household formation rates amongst 15 to 34 year olds could be greater than assumed in the 2014-based household projections\(^2\). Does that evidence have any implications for the baseline demographic growth assumed in the Plan?

Council response – Although the Government has made clear that they intend to review the approach to the standard methodology, at the time of drafting both the local plan and this response, PPG\(^3\) is clear that the 2014 household projections are to be used as the baseline for calculating LHN via the standard methodology.

PPG states that “the 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes.” As set out in our response to PQ21 above, the 585dpa was

\(^{1}\) Paragraphs 4.2 to 4.10 of Appendix 3 to the representation by Turley on behalf of Peel Land and Property Management Limited.

\(^{2}\) Paragraphs 4.30 to 4.31 of Appendix 1 to the representation by Spawforths on behalf of Firsure Ltd and others.

\(^{3}\) PPG - Why are 2014-based household projections used as the baseline for the standard method? - Paragraph: 005 - Reference ID: 2a-005-20190220 - Revision date: 20 02 2019.
the Council’s LHN at the time the evidence was being prepared. The 2019 LHN figure for Doncaster is now 553dpa.

Although Regulation 19 stage (and indeed submission) were pre-Covid-19 being declared a global pandemic by the WHO, there is also now a great deal of uncertainty surrounding the mid-2018 ONS population projections (and any inferred household formation rates from them). If the effects are as significant as the last recession (and arguably may be even greater) then household formation rates may well now decline given issues such as buyer confidence, access to lending, job security, unemployment, and so forth. How individuals may react in this unprecedented ‘post-lockdown/ post-Covid-19’ future also remains to be seen.

The representation from Firsure Ltd particularly cites the 15 to 34 year olds and suppressed assumptions around their ability to form new households due to the last economic downturn, affordability issues, and stricter access to lending. Such matters that may well now be a reality again post-Covid-19 as this cohort is arguably going to be one of the most impacted groups again. In addition to this, insights into ‘new’ ways of working for many, including the proven ability for more agile working and less commuting into central areas for work, may impact on previous preferences and perceived needs to form new households driven by work based locational needs, particularly for younger professionals such as the 15 to 34 year olds. Whether the effects are an initial short shock, or much longer-term, are still too early for anybody to reliably forecast. Until such detail is known, including what the Government’s policy response is going to be, then the local plan requires in-built flexibility to respond accordingly.

As per the Council’s preamble to the PQs, and more specifically responses to PQ21 above, and PQ23 below, the local plan’s approach to Policy 3 (setting the housing requirement as a range with the bottom being a non-fixed LHN figure as derived via the standard methodology) provides (alongside other policies) some of this much needed flexibility. This includes being able to respond to the Government’s intention to revisit the standard methodology in due course. However, and perhaps more fundamental now than any of this, is that the approach will assist with the current uncertainty surrounding both the latest pre-Covid-19 data (mid-2018 population projections, household formation rates, affordability ratios, unemployment levels, market confidence, access to finance etc.) and an ever-changing understanding of these in the future.

As the Council has already set out in our preamble to the PQs, and in some of the individual responses themselves, there is now a statutory requirement to review local plans at least every five years. By the stage of the first review, or possibly even sooner, there will be a clearer understanding of what the short/medium/long terms effects of Covid-19 will be on a range of fundamental parts of the evidence used to inform the Local Plan. A plan review could be undertaken as soon as identified as being necessary, which could be even sooner than 5 years after adoption given the unprecedented point we are currently at. In the meantime, having an up-to-date local plan provides the clear policy framework to help bring forward development and growth which will assist with the Government’s wider policy response to Covid-19. There will almost inevitably be a need to build our way out of (a likely) recession should the effects prove to be more medium/longer term, as opposed to just being a shorter initial shock as forecast by some. This is of course a far more positive approach for development.
plans and the Planning profession to adopt, as opposed to awaiting until there is a clearer picture in order to then act.

In conclusion, the local plan has been prepared during a period of considerable flux in terms of changes to population projections and transition from CLG data to ONS, coupled with the publication of the Government’s standard methodology for calculating LHN; which in itself is only an interim solution. The approach taken through the Local Plan is one of flexibility which the Council views as being very much in line with NPPF. For example, paragraph 11a that states plans should be sufficiently flexible to adapt to rapid change. Although the Council could never have predicted the unprecedented global pandemic that is Covid-19 during its preparation of the Local Plan, the need for such flexibility has never been more apparent and important as we move forward into a post-Covid-19 landscape.

**PQ23. What is the rationale for policy 3 stating that the five year requirement will be based on local housing need derived from the standard method as revised throughout the Plan period? Specifically, what is the local justification for departing from national guidance which states that housing requirement figures in adopted strategic policies should be used for calculating the five year housing land supply figure where the plan was adopted in the last five years or policies have been reviewed within the last five years and found not to need updating?

**Council response** - 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; 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 this aspirational objective. 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.

The Council’s view is that the approach is consistent. The principle of identifying housing requirements as a range, with the LHN figure as the lower end of the range, is clearly supported in PPG in respect to both calculating 5-year supply\(^{22}\) and for calculating the Housing Delivery Test (HDT) result\(^{23}\). The Council’s view is that such an approach allows the Local Planning Authority to accord with the Government’s (and the Council’s) clear objective of delivering significant economic and other growth, whilst striking the important and appropriate balance between this aim and plan-led decision-making. The approach suggested by the Council achieves this important balance.

\(^{21}\) PPG ID-68-005-20190722.
\(^{22}\) PPG Paragraph: 027 Reference ID: 68-027-20190722
As per our response to PQ21 above, the Council’s intention is to avoid setting an actual figure for the bottom of the range in the plan/policy itself. Although PPG is clear that the LHN figure may be relied upon for a period of 2 years after Submission, the insertion of the figure would date the plan very quickly which was considered as being unhelpful; hence the more narrative approach was taken forward. Further to this, the Council are fully aware that the figure/method to calculating LHN may change following further Planning reforms and that the current methodology may prove only to provide an interim solution.

Variable figures are not inappropriate and are a common feature of the Planning system. Every Local Planning Authority works to variable and changing requirement figures (even where a singular ‘fixed’ requirement figure is adopted in the plan) through 5-YHLS Statements as well as the Government’s HDT Results for example. All provide the opportunity to report/calculate using the latest LHN figure at that point in time. Indeed, where local plans are more than 5 years old (and have not been reviewed), the housing requirement may well change on an annual basis (see NPPF paragraph 73). Requirements are continually being adjusted to take account of matters such as: under-delivery; residual requirements; appropriate buffers etc., as well as how such should be addressed (e.g. Liverpool or Sedgefield method). Variables such as those noted normally result in an annually changing residual housing requirement throughout plan periods for all Authorities. The Council does not consider that the approach it advocates for the Doncaster Local Plan introduces uncertainty nor does it undermine predictability. Indeed, the planning system regularly considers and responds to such variables.

NPPF paragraph 65 establishes that housing requirement figures should be met over the plan period and Policy 3 identifies the 18,400 upper end of the range plan period requirement with sufficient sites allocated (Policy 6) to ensure that this will be met. The Council’s approach affords us to make long-term strategic decisions in order to allocate sites sufficient to deliver the housing requirement by the end of the plan period (or in Doncaster’s case sooner than that by 2030/31 – see Housing Topic Paper for details – section 7.28 (DMBC4). Given there is now a statutory requirement for local plans to be reviewed at least once every 5 years, then the requirement to use the LHN figure for purposes of 5-YHLS (as per paragraph 73 of NPPF) where strategic policies for housing are more than 5 years old, will not occur. If it were to arise then the Council would be failing in its statutory duties.

By way of summary, the expectation from PPG (ID-68-005-20190722) is that housing requirement figures in adopted strategic policies should be used for calculating 5-YHLS where the plan was adopted in the last 5 years, or policies have been reviewed within this time and found not to need updating. The Council’s view is that expressing the housing requirement as a range has been justified and is appropriate; in fact in light of the newfound uncertainty post-Covid-19 is the exact sort of flexibility that NPPF calls for. As such, the range does constitute “the housing requirement figures in adopted strategic policies” as per the expectation of PPG. PPG Paragraph 027 (ID: 68-027-20190722) then says that where a housing requirement is expressed as a range, one can use the lower figure. There is no departure therefore from national policy.
PQ24. If I were to conclude that the proposal in policy 3 to express the housing requirement as a range is justified in principle but that, to be effective and consistent with national policy and guidance\(^{24}\), the lower end of the range should be defined numerically, what would the figure be?

**Council response** – Given the Council’s responses to PQ21 through to PQ23 above, the Council does not agree that the approach advocated through Policy 3 is inconsistent with national policy (NPPF paragraph 65) and/or paragraph 027 of the PPG (ID: 68-027-20190722). As such, the Council maintains its position that the LHN as calculated through the standard methodology does provide the Council (and applicants) with a figure for the bottom of the range. As at 1\(^{st}\) April 2019 this figure is 553dpa.

PQ25. What is the current five year requirement (total number of dwellings from 1 April 2019), including appropriate buffer, calculated (a) as proposed in policy 3; (b) on the basis of the lower end of the range figure referred to in your response to PQ24 above; (c) on the basis of a housing requirement of 920 dwellings per year; and (d) on the basis of 920 dwellings per year adjusted to take account of completions since 2015?

**Council response** – Table PQ25 provides the response to this question.

**Table PQ25: Five-Year Requirement Scenario Summary**

<table>
<thead>
<tr>
<th></th>
<th>(a) Policy 3b current LHN figure</th>
<th>(b) Lower end of range PQ24</th>
<th>(c) Housing requirement of 920dpa</th>
<th>(d) 920dpa adjusted to factor in completions from 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>LHN/OAN</td>
<td>553</td>
<td>553</td>
<td>920</td>
<td>920</td>
</tr>
<tr>
<td>Net Completions 2015-2019</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>4,727</td>
</tr>
<tr>
<td>5-Year Requirement</td>
<td>2,765</td>
<td>2,765</td>
<td>4,600</td>
<td>4,275</td>
</tr>
<tr>
<td></td>
<td>(5 x 553)</td>
<td>(5 x 553)</td>
<td>(5 x 920)</td>
<td>(5 x 855(^*))</td>
</tr>
<tr>
<td>+10% Buffer</td>
<td>277</td>
<td>277</td>
<td>460</td>
<td>428</td>
</tr>
<tr>
<td>5-Year Requirement with appropriate buffer</td>
<td>3,042 (608dpa)</td>
<td>3,042 (608dpa)</td>
<td>5,060 (1,012dpa)</td>
<td>4,703 (941dpa)</td>
</tr>
</tbody>
</table>

\(^*\)The 855 figure is derived by deducting net completions for the first 4 years of the plan period 1\(^{st}\) April 2015 – 31\(^{st}\) March 2019 (4,727) from the 20-year plan period requirement (18,400), and then dividing by the remaining 16 years of the plan period (1\(^{st}\) April 2019 – 31\(^{st}\) March 2035) as follows: 18,400 - 4,727 = 13,673. 13,673/16 = 855.

**Housing Supply for the Plan Period**

PQ26. Paragraph 4.83 of the Plan refers to windfalls having been a significant source of supply, and includes various annual average figures in the region of 400 to 550 per year. Furthermore, it states that windfalls will make a significant contribution to five year supply. Paragraph 7.19.6 of the Housing Topic Paper refers to it being appropriate to set a windfall allowance of 200 dwellings per year. So what is the justification for the Plan not including a windfall allowance

\(^{24}\) NPPF 65 and PPG ID: 68-005-20190722.
(that avoids any double counting with any assumptions about supply from small site commitments)?

**Council response** – NPPF paragraph 70 is clear that where an allowance is being made from windfall sites, there should be compelling evidence that this source will provide a reliable supply, and the allowance should be realistic having regard to not just historic delivery, but also regard to the HELAA and expected future trends.

Looking at the historical evidence, windfalls have always made up a substantial supply of housing delivery in the borough, averaging 496dpa over the 20-year period immediately after adoption of the UDP (1998-2008) – see Housing Topic Paper (DMBC4) and section 7.19 for further details and analysis. This shows that even following the period of having a recently adopted/up-to-date development plan, i.e. the point where you would expect completions and supply from allocated sites to far outstrip windfalls, there has always been a healthy windfall supply which reflects the size of the borough and the numerous range and size of settlements within it. In just a single of those 20 monitoring years (2001/02) did the supply from windfalls equate to below 200dpa, with most delivering far in excess of this and hence the average for the 20-year period as above. The Council expects such a trend will continue, but that the supply from windfalls post-adoption of the local plan is likely to see a reduction in windfall supply for at least the early years/phases of the plan period.

In respect to the HELAA (SDEB45), then the 2018 Update report has been reviewed in terms of the deliverable/developable supply. Once sites that are already allocated in the plan are removed, and any sites where there is likely to be a policy objection (for example sites that are designated as Employment Policy Area, Public Open Space, or Green Belt) then relatively few sites remain. Table PQ26 below is a brief summary of the identified supply from the 2018 HELAA.

**Table PQ26: HELAA Potential Windfall Supply Summary**

<table>
<thead>
<tr>
<th>Total Number of sites</th>
<th>25</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Capacity of sites (units)</td>
<td>456</td>
</tr>
<tr>
<td>Of which failed local plan flood risk sequential test (FZ2/3 and/or significant surface water flooding – see stage 5 of site selection methodology SDEB46) (Units)</td>
<td>195 (43%)</td>
</tr>
<tr>
<td>Of which were not supported as allocations due to access concerns (see stage 6 of site selection methodology SDEB46) (Units)</td>
<td>36 (8%)</td>
</tr>
<tr>
<td>Of which were not supported as allocations due to wider site selection methodology findings (SDEB46) e.g. landfill site with unknown ground conditions/potential for gas emissions, or Local Wildlife Site/ unacceptable loss of trees etc.) (Units)</td>
<td>225 (49%)</td>
</tr>
</tbody>
</table>

In other words, the local plan has allocated the vast majority of urban sites that would otherwise have been a source of potential windfalls in the future in efforts to comply with wider national policy objectives, such as efficient use of land, using previously developed land, avoiding loss of Countryside/Green Belt, loss of agricultural land, and so forth. The main factor for why 43% of the 456 units identified above have not been allocated is that they failed the flood risk sequential test. Their ability to come forward as windfalls in the future therefore rests entirely on compliance with local plan Policy 58 part C (as well as any other relevant policies in the plan) which could be difficult in the context of an up-to-date local plan that allocates sequentially preferable sites that may not be taken
up until well into the plan period at some settlements. The other sites have also been considered, but not taken forward as allocations due to matters such as access (more detailed technical assessment by Highways colleagues compared to HELAA assessment) as well as wider sustainability and spatial planning objectives, such as protecting local wildlife sites and unacceptable loss of trees.

In addition to the above, in the Council’s experience, sites that are typical windfall sites are not put forward by land owners through the development plan/HELAA process as such sites can generally be redeveloped when the timing suits the landowner, and depending on their personal circumstances. Not having an allocation in the plan is not necessarily an impediment to a successful planning application, and there is little incentive for such site owners to make sites known/available to the Council for consideration. This is evidenced by the fact that, of the supply identified above, 69% of the total units is on sites that have been promoted to the local plan process by Doncaster Council (Assets & Strategic Housing Departments) as opposed to private landowners.

The above summary highlights strong evidence for a windfall allowance based on historic delivery, but very little in the way of evidencing a potential future supply from specific sites in the HELAA. It has not been possible to make an allowance from windfalls during the plan period towards the overall housing requirement due to lack of evidence to provide certainty around future supply. However, the local plan has resisted an additional allocation buffer, unlike some local plan’s that add say 20% for choice, flexibility, non-delivery etc. We anticipate a supply from windfalls of around 200dpa (3,400 over the remainder of the plan period). Reducing the scale of allocations due to assumptions around windfall rates would remove the buffer and therefore likely result in the need to allocate additional sites (or the same sites) to provide confidence again that sufficient housing supply will come forward. It is also noted that a common response from the industry representations is that the plan is ‘unsound’ due to not identifying additional allocations as part of a buffer. The Council has not made any attempts to reduce allocations due to anticipated supply from windfalls therefore, but expect a continued supply which provides part of the flexibility for any non-delivery on allocated sites and, coupled with other sources of housing supply, ensures the housing requirement will be met over the plan period.

PQ27. Please provide a summary table setting out supply for the plan period (2015 to 2035) from:

- Net completions 2015-2018
- Expected completions on allocations with planning permission at 2018.
- Expected completions on other commitments at 2018 (eg small sites).
- Expected completions on allocations without planning permission.
- Any other sources of supply expected to be delivered by 2035 (e.g. windfalls).
- Total number of new homes expected to be built 2015-2035.
- Any other identified sources of supply not expected to be delivered by 2035 (e.g. allocations continuing to be built after 2035, reserve sites).
- Any other identified sources of supply that would not count towards the aim of accommodating 18,400 homes in the plan period (e.g. those at Doncaster Sheffield Airport).
Council response – Table PQ27 below sets out the supply as per the Publication version (June 2019) of the Local Plan, including the appropriate reference. However, a number of amendments have been identified, largely through the representations, which result in consequential updates to some of these figures. These have been identified in the Schedule of Minor Amendments to the plan (CSD6) submitted alongside the Local Plan for examination (although these are factual/minor in nature so are not part of the examination itself). For ease of reference, the table below includes the revised figure and a short explanation as to why the change is necessary. The Housing Topic paper (DMBC4) provides additional details on housing supply from the various sources, in particular at section 7. The table identifies that 23,791 new homes are expected to be built by the end of the plan period. A further 4,930 dwellings are identified from other sources (2,638 units on reserve sites, or housing at the Airport in line with Policy 7) with the balance (2,292 units) falling beyond the plan period.

Table PQ27: Plan Period Housing Supply Summary

<table>
<thead>
<tr>
<th>Housing Supply Source</th>
<th>Plan Period Supply 2015-2035</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Local Plan Figure (Ref)</td>
<td>CSD6 Amendment Figure</td>
</tr>
<tr>
<td>Net completions 2015-2018</td>
<td>3,400 (Table 5/ pg44, bullet point 2)</td>
<td>n/a</td>
</tr>
<tr>
<td>Expected completions on allocations with planning permission at 2018.</td>
<td>9,548 (Table 5/ pg44 bullet point 5)</td>
<td>9,289</td>
</tr>
<tr>
<td>Expected completions on other commitments at 2018 (e.g. small sites).</td>
<td>Permissions 5+ units at Defined Villages</td>
<td>83</td>
</tr>
<tr>
<td>Expected completions on allocations without planning permission.</td>
<td>Permissions 1-4 units borough-wide</td>
<td>502</td>
</tr>
</tbody>
</table>
of the wider approved colliery permission was not mapped correctly as part of the Development Management process; please see the comparison plans on final page of CSD6 for the difference. There is no general change to the overall area of the 2 sites, as the southern boundary of the additional allocation remains unchanged. However, where the 2 sites adjoin the correctly mapped boundary provides for a larger developable area of the allocation (Ref: 247) than what there was previously; 9.85ha increasing to 14.1ha.

<table>
<thead>
<tr>
<th>Any other sources of supply expected to be delivered by 2035 (e.g. windfalls).</th>
<th>Defined Village housing in line with Policy 2/3</th>
<th>290 (Policy 2/3)</th>
<th>n/a</th>
</tr>
</thead>
<tbody>
<tr>
<td>Windfalls (200/annum)</td>
<td>3,400 (n/a)</td>
<td>n/a</td>
<td></td>
</tr>
</tbody>
</table>

This is the supply for the 17-year period 2018-2035 as windfalls delivered in the first 3 years of the plan (2015-2018) are known and already included in the net completion figure in row 1 above. 17 x 200 = 3,400

| Brownfield Land Register 2019 | 197 (n/a) | n/a |

Additional sites (i.e. the ones not already shown as allocations in the plan) on the 2019 brownfield register are derived from a number of sources. The 197 units is made up of 17 sites; 15 that are now permissioned and 2 sites which have applications pending. The Council accepts that there could be some overlap in assumptions around supply from this source and the windfall supply of 200dpa, although in line with the guidance the brownfield register only identifies sites capable of delivering 5+ (net) units. The remainder of the potential supply from the brownfield register is entirely dependent on landowner intentions, in particular for occupied sites.

| Total number of new homes expected to be built 2015-2035 | 23,791 |

This is the amended figure incorporating amendments from CSD6 as set out above.

<table>
<thead>
<tr>
<th>Any other identified sources of supply not expected to be delivered by 2035 (e.g. allocations continuing to be built after 2035, reserve sites).</th>
<th>Allocations supply post 2035</th>
<th>2,236 (Table 5/ pg.44 bullet points 8&amp;9)</th>
<th>2,292</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reserve Sites</td>
<td>1,483 (Table 5/ pg.44 bullet point 11)</td>
<td>1,438</td>
<td></td>
</tr>
</tbody>
</table>

CSD6 amends the northern Rossington Colliery site area (Ref: 247) as set out above which includes a higher capacity for the site resulting in 56 units now falling beyond the end of the plan period.

CSD6 corrects a typo and incorrect capacity/reversal of last 2 digits of the figure from 1,483 to 1,438. Some are constrained by FZ3 so would only come forward if in line with Policy 58 which may be difficult in the context of an up-to-date local plan with sufficient allocations for the plan period identified that are sequentially preferable. The remainder are sites that may have been
Any other identified sources of supply that would not count towards the aim of accommodating 18,400 homes in the plan period (e.g. those at Doncaster Sheffield Airport).

<table>
<thead>
<tr>
<th>Source</th>
<th>Allocation</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Airport allocation</td>
<td>280</td>
<td>(Policy 7 – Part E2)</td>
</tr>
<tr>
<td>Airport jobs-dependent allocation</td>
<td>920</td>
<td>(Policy 7 – Part E3)</td>
</tr>
</tbody>
</table>

**Total number of new homes from other sources**

| 4,930 |

PQ28. Paragraph 4.77 of the Plan refers to capped and uncapped supply, with the latter including an additional 2,263 dwellings in the period 2018-2033. Are there any policies in the Plan that would prevent that “capped” supply being delivered before 2033?

**Council response** - No, nor is this the intention of “capping”. Capping is a calculating measure we have used in relation to 15 year allocated supply to ensure a distribution of housing across the Borough and to the places intended to receive new housing. This is because the settlements with allocations fall into 3 tiers – the Main Urban Area, Main Towns and Service Towns and Villages, which each have collective targets of 50%, 40% and 10% respectively of the Borough’s housing supply per tier.

Within these tiers, there are settlements with a significant supply from existing permissions, such as Dunscroft, Dunsville, Hatfield & Stainforth, Askern and Edlington.

If, for calculation purposes, the Council did not apply a cap when settlements surpass their individual housing targets, then certain areas would account for a disproportionate amount of housing within the tiers towards the overall supply. Capping prevents oversupply against housing targets in one area from offsetting the housing requirements in other areas. For example, Askern and Edlington alone can account for all the housing needed in the Service Towns and Villages tier, however if this were allowed to happen then eight other settlements deemed sustainable and needing housing to meet local needs would not require any new sites – which would not be in accordance with the settlement strategy.

Instead, by capping settlements when they surpass the housing target, all settlements will receive the opportunity to deliver their housing target locally.

The “over-supply” of housing above the housing target in each settlement will be set aside for calculation purposes to account for housing in the final two years of the plan (16 – 17), where no specific allocations are being made to meet the requirement beyond year 15. This means that between 2015 and 2035, the 18,400 dwellings target will be met overall.
The only way to ensure delivery is spread across the whole plan period equally would be to apply a policy which phases the release of housing sites, however this was not felt likely to be popular with the development industry and difficult to implement in practice. The Council also questions whether such an approach would be considered positive and in line with NPPF.

Nor does the Council think it is appropriate, given the high levels of supply, to allocate more large sites (which are not the sequentially preferable options in any eventuality) to ensure that housing will be continue to be delivered across the plan period due to their scale and prolonged build out rates. Some large sites will still be delivering later in the plan period, some sites may be delayed in coming forward, and overall the plan will deliver more than enough housing for the 20 year period – although it is unlikely it will be in a uniform manner. Furthermore as a large amount of the supply is made up of permissions, the Council would not be able to phase the release of these sites – in effect meaning that a large amount of new allocations would need to be deliberately delayed to ensure they deliver later in the plan period once permissions have been developed.

PQ29. The Council’s Five Year Deliverable Housing Land Supply Statement 2019-2024 identifies total capacity of 6,870 dwellings on sites considered to be deliverable on 1 April 2019. How many of those dwellings fall into the following categories:

a) Sites of fewer than 10 dwellings with outline or full planning permission.

b) Sites of 10 or more dwellings with detailed planning permission.

c) Sites of 10 or more dwellings with outline planning permission.

d) Sites with a grant of planning permission in principle.

e) Allocations without planning permission.

Council response – Firstly, as part of preparing the response to this question the Council has identified a typo in the 5-Year Deliverable Housing Land Supply Statement (SDEB27) for the total supply figure from the Main Urban Area (Appendix A – Doncaster Main Urban Area on page 10). The table as published states this supply to be ‘1,192’ but should read ‘1,912’ units (+720 units). The Council apologises for any confusion that this may have caused and, for clarity, the following (Table PQ29a) is an updated version of the summary table from pg. 5 with corrected figures shown in red (and deleted figures struck through and in black).

Table PQ29a: What is Doncaster’s Deliverable Housing Land Supply

<table>
<thead>
<tr>
<th>Source of Supply</th>
<th>Total Remaining net Capacity (as at 1st April 2019)</th>
<th>Deliverable Capacity net (0-5 years)</th>
<th>Lapse rate/ non-delivery allowance applied to Total Deliverable Capacity</th>
<th>Deliverable Capacity net (0-5 years &amp; post lapse rate being applied)</th>
<th>Sources/ Further Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Planning Permissions 5+ Units (net) as at 1st April 2019</td>
<td>11,446</td>
<td>4,344 5,061</td>
<td>10%</td>
<td>3,905 4,555</td>
<td>See Residential Land Availability Report 2019 (SDEB26). Appendix A of this Statement provides the details of the sites that make up the 5-year supply for reference, including where discounting has occurred and evidence for Major Outline permissions 10+ units. A 10% lapse</td>
</tr>
</tbody>
</table>

---

25 SDEB27.
<table>
<thead>
<tr>
<th>Source of Supply</th>
<th>Deliverable Capacity net (0-5 years)</th>
<th>Deliverable Capacity net (0-5 years &amp; post lapse rate being applied of 10%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Sites of fewer than 10 dwellings with outline or full planning permission.</td>
<td>786</td>
<td>707</td>
</tr>
<tr>
<td>b) Sites of 10 or more dwellings with detailed planning permission.</td>
<td>3,449</td>
<td>3,104</td>
</tr>
<tr>
<td>c) Sites of 10 or more dwellings with outline planning permission.</td>
<td>1,314</td>
<td>1,183</td>
</tr>
<tr>
<td>d) Sites with a grant of planning permission in principle.</td>
<td>119</td>
<td>119*</td>
</tr>
<tr>
<td>e) Allocations without planning permission.</td>
<td>1,561</td>
<td>1,405</td>
</tr>
<tr>
<td><strong>Total Deliverable Supply from Specific Sites</strong></td>
<td><strong>7,229</strong></td>
<td><strong>6,518</strong></td>
</tr>
<tr>
<td>Windfall Allowance</td>
<td>1,000</td>
<td>1,000</td>
</tr>
<tr>
<td><strong>TOTAL DELIVERABLE SUPPLY</strong></td>
<td><strong>8,229</strong></td>
<td><strong>7,518</strong></td>
</tr>
</tbody>
</table>

* The supply has not had a 10% non-delivery allowance applied given the total supply from this source had already been discounted to remove any schemes that were not under construction as at 1st April 2019.
PQ30. Which parts of which submitted documents provide the clear evidence for the assumptions about the number of dwellings expected to be delivered within five years on each of the sites that fall into categories (c) to (e)?

Council response – The Council’s 5-Year Housing Land Supply Statement, covering the period 2019-2024, (SDEB27) sets out the relevant parts of NPPF/PPG in respect to the definition of deliverability and how this can be evidenced (see paragraph 1.7). The PPG states that plan-makers can use the Housing & Economic Land Availability Assessment (HELAA) to demonstrate the deliverability of sites. The Council’s HELAA methodology (SDEB45) sets out assumptions around lead-in times from Outline permission to Reserved Matters and commencement, as well as build-out rates depending on site size and number of developers on site, and so forth. The methodology was agreed with the Housing Stakeholder Group which included representatives from the Home Builders Federation as well as other stakeholders. In particular, see section 6.2.8 on page 17 of the April 2015 (published December 2016) HELAA for the methodology as this has not been repeated in the future annual HELAA updates in the interests of brevity. In addition to this, the Housing Topic Paper (DMBC4) includes analysis and evidence of recently achieved build out rates based on the annual monitoring and a summary of the HELAA lead-in times (pages 79-80).

In respect to the sources of supply (c to e) that the question specifically enquires about:

- (c) Sites of 10+ dwellings with outline permission – Appendix A of the Council’s 5-Year Deliverable Housing Land Supply Statement (SDEB27) includes further details for the 8 sites that contribute towards this supply. In line with the above, the HELAA methodology has been applied in respect to lead-in times for detailed planning and starts/completions on site as well, unless otherwise stated e.g. evidence provided as part of a Public Inquiry. Progress towards Reserved Matters and/or towards provision of any significant infrastructure required has also been set out where relevant. Likewise, evidence provided from any Regulation 19 representations from agents/developers/landowners has been used and briefly summarised in this Appendix.

- (d) Sites with grant of planning permission in principle – as at 1st April 2019 there were 206 units that fell into this category. As eluded to above, the Council has only included in the deliverable supply the 119 units from the eight sites that were already under construction based on the Council’s annual monitoring (Residential Land Availability Report 2019 - SDEB26). Appendix C of the Council’s 5-Year Housing Land Supply Statement (SDEB27) includes a summary of this supply. As well as these sites being under construction, some have already had completions recorded during the previous 2018/19 monitoring year.

- (e) Allocations without planning permission - Appendix D of the Council’s 5-Year Deliverable Housing Land Supply Statement (SDEB27) includes further details for the 27 sites that contribute towards this supply. In line with the above, the HELAA methodology has been applied in respect to lead-in times for planning and starts/completions on site, unless otherwise stated. Progress towards planning permission, where relevant, is also identified. This includes a number of Doncaster Council led affordable
housing schemes and land disposals to the market as part of the comprehensive Assets Review Programme. Likewise, evidence provided from any Regulation 19 representations from agents/developers/landowners has been used and briefly summarised in this Appendix.

PQ31. Section 7.13 of the Housing Topic Paper identifies a total of 2,152 dwellings on sites under one hectare that are committed or allocated in the Plan or on the Brownfield Register. It goes on to state that this represents 11.7% of the requirement of 18,400 dwellings for the Plan period and concludes that this meets the requirement in NPPF 68. However, paragraph 4.81 of the Plan sets out different figures, and seems to suggest that 8% of supply is on sites under one hectare. Please clarify, and advise whether you consider that the Plan is consistent with national policy in this regard.

Council response – At the time the local plan was drafted for Publication, the most up-to-date Brownfield Register published was the 2018 version. All of the allocations in the local plan that were Brownfield, and less than 1 ha in size, were also identified on the 2018 Brownfield Register and therefore was broadly compliant with NPPF paragraph 68a, albeit short by 3% of the 10% requirement as the local plan acknowledges at para 4.81. To address this therefore as soon as practicably possible, the text committed the Council to identifying at least 10% of the supply through the next update to the Brownfield Register. After the plan was published under Regulation 19 (July 2019) the Council undertook its annual update to the Brownfield Register and this was published in December 2019. The Housing Topic Paper was drafted in early 2020 to support Submission of the local plan and used the more up-to-date supply from the 2019 Register therefore and hence the difference in its reporting of the higher 11.7% figure.

In effect, the Council has now already done what paragraph 4.81 was stating. Having re-checked the final size of the allocations in the local plan (as some were slightly tweaked as part of mapping sites on the Policies Map), and compared with the latest 2019 Brownfield Land Register, there is nearly 13% (2,320 units) of the plan period ‘upper end of the range’ housing requirement (18,400) identified on small sites (less than 1ha in size) either allocated through the plan (1,311 units) or listed on the 2019 Brownfield Register (1,009 units). These figures supersede both the ones quoted in the local plan and Housing Topic Paper.

The text at paragraph 4.81 is now already time expired therefore and the Council suggests amendments as follows which could be considered as grounds for a Main Modification. The following is an updated version of paragraph 4.81 from the local plan on pg. 42 with new and updated text shown in red (and deleted text struck through and in black). The revised wording also provides clarity that the percentage is based on the whole plan period requirement of 18,400 dwellings.

| 4.81 The Allocations include a good range of sites in terms of spread across the Borough, Greenfield and Brownfield, urban and urban extensions and of different sizes including a number of smaller sites which, along with windfall opportunities, should encourage the small building firms to increase delivery in the Borough. National policy requires at least 10% of the housing requirement to be allocated on sites up to 1 hectare in size to be identified on sites of up to 1 hectare in size in the Local Plan, and/or identified in Brownfield Land Registers. |
996 of the allocations identified on the Policies Map are on sites up to 1 hectare in size and equate to 1,297,311 dwellings. The Local Plan’s housing requirement for the 20-year plan period is expressed as a range. Compared to the top of the range this represents 7% of the requirement. Further to this, the 2018 Brownfield Land Register identifies an additional 146 sites totalling 142,109 units on sites less than 1 hectare in size which are not proposed as allocations. Collectively this equates to a total of 813% of the plan period requirement of 18,400 dwellings being on small sites less than 1 hectare in size. The next update to the Brownfield Register will commit to identify additional small sites to make good the 2% shortfall.

Viability

PQ32. The viability testing report26 runs base appraisals for the site typologies, and then applies various sensitivity tests. However, none of these appraise the full set of policy requirements included in the submitted Plan ie 23% affordable housing in high value areas and 15% elsewhere with all of the policy requirements including M4(2) and M4(3). Please carry out that particular appraisal and present the results as in a similar way to section 6 of the report and appendix 3.

Council response – The Council instructed CP Viability to undertake this appraisal in line with the above. A separate Addendum to the Whole Plan Viability Testing report 2019 (SDEB48.1) has been provided (please see Appendix PQ32).

PQ33. How many dwellings on allocated sites (a) with and (b) without planning permission that are assumed to be built within the Plan period are within (i) high value market areas (as defined on the map in Appendix 5) and (ii) elsewhere? Please provide lists of the sites in each category in the same order as they are set out in chapter 16 of the Plan.

Council response - Summary Table PQ33 sets out supply from both permissioned and non-permissioned sites in the plan period within the high and low value areas. The detailed tables in line with those at Chapter 16 of the local plan are set out at Appendix PQ33. The Table shows that 76% of the supply is in the higher value area and that one-fifth of the supply from the lower value area is from permissioned sites.

Table PQ33: Housing Allocations by Viability Value Area

<table>
<thead>
<tr>
<th></th>
<th>High value market area</th>
<th>Low value market area</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) No of dwellings in plan period from permissioned sites (%)</td>
<td>6,148 (39%)</td>
<td>3,141 (20%)</td>
<td>9,289</td>
</tr>
<tr>
<td>b) No of dwellings in plan period from non-permissioned sites (%)</td>
<td>5,977 (38%)</td>
<td>653 (4%)</td>
<td>6,630</td>
</tr>
<tr>
<td>Total (%)</td>
<td>12,125 (76%)</td>
<td>3,794 (24%)</td>
<td>15,919</td>
</tr>
</tbody>
</table>

The above does not include any housing at the Airport in line with policy 7 which is identified as being in the higher value area. The Housing & Employment Site Selection Methodology Report (SDEB46 page 115 onwards) sets out some additional explanation that is relevant in terms of the viability challenges in the

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26 SDEB48.1.
lower value market areas. It is also worth noting that of the 653 units identified above, 41% of the capacity is on sites owned by Doncaster Council, including sites in the Housing Revenue Account. As landowner, the Council can (and does) dispose of its assets motivated by a range of objectives that are not always driven by maximising capital receipts and expecting returns and land values akin to the assumptions that have fed into the viability evidence base. Of the remaining 385 units, all of this capacity, with the exception of a single site, have progressed to either now have permission or applications pending.

**Affordable Housing**

**PQ34. How many affordable homes per year are expected to be delivered through the requirements of policy 8 part B in the plan period 2015 to 2035?**

**Council response** - The following analysis is based on:

- delivery in the first 4 years of the plan period (2015-2019);
- affordable housing units secured through permissions (as at April 2019);
- remaining allocations; and,
- Airport housing in line with Policy 7.

There is an identified supply of 3,461 affordable homes. Table PQ34 provides a breakdown of the supply with supporting detail located at Appendix PQ34. It should be noted that this is highly likely to be an underestimate of overall affordable housing delivery due to 3 main reasons:

- There is no allowance made for the Council’s own affordable housing delivery programme (other than where they are existing commitments) which is being worked up, including the Council House build programme;
- A number of permissions, in particular smaller schemes just above the 15 unit threshold, make commuted sums in lieu of direct on site provision to bring forward affordable housing (including to assist DMBC schemes eluded to above) elsewhere in the borough; and,
- A number of the larger permissioned sites have clawback and overage agreements written into the Section 106 Agreements which requires periodic review of viability at key triggers during the lifetime of these developments looking as to whether an affordable housing contribution could be secured at a later date.

**Table PQ34: Affordable Housing Supply for Plan Period**

<table>
<thead>
<tr>
<th>Source</th>
<th>No. of Affordable Housing Units</th>
<th>Comments</th>
</tr>
</thead>
</table>
| Completed (1st April 2015-31st March 2019) | 704                             | LDF Core Strategy Policy CS12 requires 26% affordable housing on sites 15+ units. This includes both Council and private units. Annual breakdown as follows:  
  - 2015/16 – 151;  
  - 2016/17 – 161;  
  - 2017/18 – 166;  
  - 2018/19 – 226. |
| Permissioned Supply (Ch 16 - Tables H1(A-O)) | 1,009 | Expected yield from planning permissions (as at 1st April 2019) based generally on s106 Agreements and with some adjustments to avoid double counting with units delivered in 2018/19 and so included in the above supply already. Appendix PQ34 includes site-by-site details. |
| Non Permissioned Allocations (Ch 16 - Tables H2(A-Q)) | 1,472 | Anticipated yield based on Policy 8B 15%/23% requirement with adjustments to reflect that some of these sites are now permissioned (but not included in the above). Appendix PQ34 includes site-by-site details. |
| Policy 7: DSA Housing (Initial 280 units & up to 920 jobs-led units) | 276 | 23% affordable requirement area |
| **Total** | **3,461** | |

**Accessible and Adaptable Homes**

**PQ35.** The Housing Design Standards Policy Evidence Paper\(^{(27)}\) projects that the number of 65 year old and over households in the Borough will increase by 705 per year through the plan period. The Evidence Paper also projects an annual increase of 225 households with long term health problems or disabilities during the Plan period. Would the requirement in policy 46 for 65% of all new homes on developments of over 0.5 hectares or 10 or more units to meet Building Regulation standard M4(2) be likely to meet the expected need for accessible and adaptable homes?

**Council response** –

In summary:

705 x 15 = 10,575 projected increase in 65 year old and over households

705 – 135 = 570 x 15 = 8,550. This figure is lower due to the fact we have subtracted the 135 65+ who have Long Term Health Problems or Disabilities because they are included in the 225 figure (see explanation below).

225 x 15 = 3,375 projected increase in households with long term health problems or disabilities.

Total need 8,550 + 3,375 = **11,925**

The Evidence Paper (SDEB25) proposed the percentage requirement based upon the assumed delivery of 920 homes per year over a 15 year period, but it was accepted at 65% this would not fully meet the identified need (65% of 920 dwellings per year is 598 dwellings x 15 years = 8,970 homes with the potential to deliver the M4(2) standards. 8,970 is below the total need figures. 65% was considered a reasonable target for the policy given that:

- The informal consultation preceding Publication had proposed a lower percentage figure (in the absence of a supporting evidence paper), but

\(^{(27)}\) SDEB25.
had met with some negative responses from the development industry even at a lower level;

- There is a recognition that some of the need will continue to be met through adaptations of existing social and private housing, Council new build and Housing Associations. This is outlined within the evidence paper; and,
- The need to be mindful of viability and deliverability issues.

To answer PQ35, the Council have undertaken a more detailed analysis of the actual remaining potential and what sites the policy could apply to from the current time. Only units without full detailed planning permission on sites of 10 units or more that are capable of achieving the standards have been counted, other existing permissions with approved full detailed designs have no scope to change unless an amendment application is submitted. There are 9,678 units on allocated sites which do not have full planning permission as of April 2020. See Appendix PQ35 for the detailed workings as to how this figure was calculated.

If the current wording of the policy was applied to the number of remaining units without full planning permission as of April 2020, calculated above, it is estimated that a maximum of 6,291 homes (65% of 9,678) could be delivered to part M4(2), and 484 homes (5% of 9,678) could be delivered to part M4(3) of the policy. This could give a combined theoretical total of 6,775 (6,291 + 484) homes built to M4(2) and M4(3) adaptable standards. However, it is anticipated that it would be unlikely that this full ask would be obtained from allocated sites, as some sites may have viability or technical constraints which means the full 65/5% could not be achieved. This is acknowledged in the wording of the policy and explanatory text. Also, by the time the Local Plan is adopted this figure will be lower as other detailed and reserved matters permissions are likely to be obtained on allocated sites. Conversely, the above figures only include allocated sites in the Local Plan, and do not include the potential delivery of further housing through windfall sites, reserve sites, and development tied to jobs growth at Doncaster Sheffield Airport (Policy 7). It is therefore concluded that the figures of 6,291 and 484 could be considered as optimistic estimates based upon allocated sites, or conservative estimates if other potential sources of supply are factored in (albeit a precise figure for this cannot at present be assumed).

PPG 28 suggests Local Planning Authorities should assess the likely future need for housing for older and disabled people (including wheelchair user dwellings). Section 2.38 – 2.88 of the Housing Design Standards evidence paper (SDEB25) discusses the projected need in detail. The evidence paper suggests by 2035 there will be an increase in 705 households per year obtaining an individual aged 65+. There will also be an increase of 225 households obtaining an individual with a Long Term Health Problem or Disability (LTHPD). Not all individuals aged 65 and over will require adaptable housing (i.e. M4(2) or M4(3)). Figure 17 within the evidence paper outlines the number of people in Doncaster with a LTHPD broken down into age categories based upon data from the 2011 Census and ONS population projections. This estimates that by 2035, roughly 60% of those individuals with a LTHPD will also be within the 65 and above age category. Using this calculation, this would estimate that 135 out of the 225 new households with a LTHPD would cover the need for age 65+ households that have a LTHPD.

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28 ID: 56-007-20150327
705 homes per year minus the 135 already accounted for under the 225 figure leaves 570 homes per year (8,550 in total). 8,550 plus the 3,375 (225 x 15) equals 11,925. The total need of for older and disabled people is therefore 11,925 homes.

Theoretically, Policy 46 could deliver 6,775 adaptable homes as discussed above. This figure is higher than the projected need of 3,375 (225 x 15 years) households with a LTHPD, so this would, if delivered, ensure that those with the greatest need (i.e. those with a LTHPD) for an adaptable and accessible home could have their needs met. However, it would not meet the full needs of the growth in households of those aged 65+ as the remaining 3,400 homes (6,775 - 3,375) would not cover the shortfall of 8,550 in the total number required (still 5,150 adaptable homes short).

It should be borne in mind that some of the future need for adaptable housing will continue to be provided for through the local authority. This would be in the form of the Council’s adaptations programme, the Council’s housing stock, and new build programme. We estimate up to 1,000 new homes may be delivered through the Council House Build programme over the plan period, with these homes being built to the standards required by Policy 46. As demonstrated in the evidence paper, however, the future need cannot rely solely on the Council and the policy should ensure the private sector also offers a realistic and proportionate supply. The 65%/5% target figures could have been higher to meet the need, but were also based upon the need to respond to viability issues and concerns raised during the consultations on earlier iterations of the Local Plan- i.e. balancing aspiration with deliverability.

So overall whilst it cannot be accurately answered at this stage due to the factors discussed above, it is considered the policy target percentages are reasonable and should, whilst not fully meeting the likely future need for housing for older and disabled people, make a major contribution to developing a more adaptable and equitable housing stock for the community and future generations.

As set out in the evidence paper, the Council finds it appropriate and justified to require that 65 percent of all new dwellings are built to M4(2) requirements and 5 percent of new builds to be built to M4(3) wheelchair adaptable standards. It would help accommodate the projected increase of 705, 65 and over households per year and projected increase of 225 LTHPD households per year.

In light of the policy objective to offer people the choice to live more independently for longer, this gap is important to overcome particularly in the private sector housing market where many will continue to choose to live. The Council is committed to ensuring a wide range of needs is catered for by ensuring genuine housing choices in Doncaster, the standards will help support this. It is imperative that we recognise that without this adequate and appropriate choice we will be failing to create housing that serves all our community.

**Rural Housing**

PQ36. Policy 2 part 5 states that all non Green Belt land outside the development limits of the Main Urban Area, Main Towns, Service Towns and Villages and Defined Villages is to be treated as countryside
meaning that development proposals will be subject to policy 26. Policy 26 seems to only allow new dwellings if they are essential for rural workers. Does that mean that new dwellings in all parts of the countryside (as defined in policy 2) would be “isolated”?

Council response - As explained below the Local Plan does not suggest that new dwellings in all parts of the Countryside (as defined by Policy 2) would be isolated.

NPPF paragraph 79 provides policy for the “development of isolated homes in the countryside”. However, the NPPF does not define what it means by either “isolated” or “countryside”.

To be effective the Local Plan has defined “Countryside” according to the definition in the opening sentence to Part 5 of Policy 2, i.e.: “as that outside of the Green Belt and beyond defined ‘Development Limits’ as shown on the Policies Map”.

The Council’s interpretation and application of NPPF paragraph 79 is that “isolated” housing should only be allowed if it meets one of the criteria of NPPF paragraph 79. Apart from paragraph 79 the NPPF does not refer elsewhere to where ‘isolated’ homes may be appropriate. Therefore, neither does the Local Plan.

[To minimise repetition of this national policy, local interpretation of NPPF paragraph 79 in the Local Plan is restricted to that for criteria a) and c) – via Parts 3 and Parts 1 respectively of Policy 26. Specific Local Plan policy for criteria d) and e) is not considered necessary as the NPPF policy is sufficiently clear but it should be noted that both provide a potential source of ‘isolated’ housing.]

This does not mean that all other housing development in all parts of the Countryside would be “isolated”, i.e. that no other housing would be allowed. This is because Policy 26 is not the only planning policy relevant to proposals for housing in the Countryside. The Local Plan’s wider strategy (as summarised below) adopts as positive an approach as it can to supporting rural housing so that it responds appropriately to supporting rural housing developments that reflect local needs.

Local Plan policy preparation has had to be mindful of what can be seen to be the competing demands of national planning policy in the NPPF.

For example, Plan preparation has been mindful of the need to ‘recognise the intrinsic character of the countryside’ (NPPF paragraph 170b) and thus avoid a policy approach that could lead to the unplanned gradual erosion of the Countryside from speculative ad-hoc housing proposals.

On the other hand, Plan preparation has also been mindful of the clear policy in the NPPF that “to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities” (NPPF paragraph 78). It achieves this via policy for the Plan’s Settlement Hierarchy set out in Policy 2 – particularly that for Level 3 and 4 settlements.

29 NPPF 79(a).
For the wider Countryside, and in addition to Policy 26, the Local Plan supports rural housing through the following:

- The second part of Part 5 of Policy 2 – which provides policy for the situation where a five-year borough-wide supply of housing cannot be demonstrated. This is to provide flexibility and to retain a degree of plan-led “control” over the location of development in these specific circumstances.

- The last part of Part 5 of Policy 2 – which applies to land in the (defined) “Countryside” adjacent to 14 Defined Villages. This is to be read in conjunction with the relevant part of Policy 3.

- Policy 8 which allows for new residential development where the removal of occupancy conditions is considered appropriate.

NPPF Paragraph 79e allows for the development of isolated homes where the design is of exceptional quality. To avoid repetition of this national policy, the Local Plan does not include its own Policy.

NPPF Paragraph 77 allows for an additional source of new housing in the ‘Countryside’ via ‘rural exception sites’

- Again, to avoid repetition of this national policy, the Local Plan does not include its own Policy. Experience in Doncaster has shown that this has not been a significant source of new dwellings in the Borough. However, the potential remains.

NPPF Paragraph 71 provides for a further additional source of new housing in the ‘Countryside’ via ‘entry-level exception sites’. Again to avoid repetition of this national policy, the Local Plan does not include its own Policy.

Taken together, the above national and local planning policies is considered an appropriate approach towards supporting housing in the Borough’s ‘Countryside’. Development is directed proportionately according to the Plan’s Settlement Hierarchy to achieve the overall need for delivering sustainable development whilst recognising the intrinsic character of the Countryside.

To stress that Policy 26 should be read in conjunction with the NPPF, the following Main Modification is proposed with the following new text (in red) to be inserted at the end of Part 3.

- Other proposals for new dwellings in the Countryside will be supported in line with national policy for ‘entry level’ exception sites for housing, rural exception sites for housing and for isolated homes of exceptional design quality.

**Local Labour Agreements**

**PQ37.** Policy 4 part C states that for developments that propose 20 or more direct jobs, the Council will seek to enter into a local labour agreement with the developer. How is that particular policy intended to be implemented? If it would involve the use of planning conditions or obligations, would that be compliant with relevant legal requirements and national policy?

**Council response** – Policy 4 Criteria C will be implemented using Section 106 Agreements and supported by a Supplementary Planning Document after the
Local Plan has been adopted (as stated in the policy explanatory text paragraph 4.64). The implementation of the policy will also be undertaken with the assistance and guidance of Business Doncaster (the Inward Investment Team for Doncaster). A number of local planning authorities have implemented the use of local labour agreements through Section 106 Agreements and have been implementing them for a number of years.

Doncaster Council already has experience in dealing with such issues through two schemes: iPort where the developer has funded the iPort Academy to help meet training and recruitment needs; and also at Unity, where a training centre will also be provided through the Section 106 Agreement.

The NPPF (paragraph 8) states that the planning system has three overarching objectives to achieve sustainable development: economic; social; and environmental. The economic objective is to help build a strong, responsive and competitive economy; and the social objective is to support strong, vibrant and healthy communities. By encouraging and implementing local labour agreements, it is considered that Criteria C of Policy 4 will meet national guidance.

Local Plan Policy 66 (Developer Contributions) also identifies the principle of local labour agreements and it is considered that asking for such provision meets and complies with the statutory tests i.e. necessary; directly related; and fairly and reasonably related in scale and kind. In line with Policy 66 Part A, local labour agreements will only be sought “where necessary, directly related to the development, and fair and reasonable in scale and kind”. It is therefore not the case that a development could be acceptable in all other respects but unacceptable if a local labour agreement is not in place. As with any planning application, the Development Management process will need to be satisfied that individual applications can meet the statutory tests included in Policy 66 and therefore local labour agreements will be sought on a site by site basis and secured where it is reasonable to do so.

Policy 4 also states that “…the Council will seek to enter in a local labour agreement…” (Council’s emphasis) meaning that although reasonable attempts will be made for employment and other developments that propose 20 or more jobs, to enter into a local labour agreement, it is recognised that it will not be possible for all such developments to secure such an agreement (potentially for a variety of reasons). The requirement for a local labour agreement is one of many considerations that Development Management will need to take into account.

The Employment Land Needs Assessment (SDEB8) shows that Doncaster borough has significant levels of deprivation with 36% of the population living in areas rated in the top 20% deprived in England. It is considered that implementing local labour agreements will greatly benefit the borough through helping communities access local employment and training opportunities. The overall outcome will be to help reduce deprivation and social exclusion.

There is also support for Policy 4, Criteria C from the developer of one of the large employment allocations (Site Ref:001 -Thorne North - representation ref: 05293).

**Major Road Network Enhancement Priorities**

**PQ38.** Policy 13 part A supports proposals to improve key routes and connections and effectively manage traffic and relieve congestion in a
number of locations. Table 7 provides information about eleven major road network enhancement priorities. The broad locations of some of those are shown on the Key Diagram. (a) Is it the intention that the Plan protects any sites and routes for new roads? (b) If so, which specific policies would effectively achieve that, and (c) what is the robust evidence as required by NPPF paragraph 104(c)? (d) If not, what is the purpose of policy 13 part A?

Council response - The key connections identified in Table 7 are not within protected routes therefore requires no policies or evidence at this stage. They are all schemes that have not gone beyond feasibility and therefore do not have defined routes but are being considered on a corridor basis with future potential options to be evaluated before a defined route is reached. In response to part (d) therefore, the purpose of Policy 13 Part A is to identify schemes which facilitate improvements to key routes and connections to the Strategic Road Network. The schemes listed in Table 7 are our priorities as and when funding opportunities become available. The schemes will deliver improvements to capacity; reduce congestion; unlock future development and accommodate recent development; improve air quality; improve safety and the reliability of journey times and provide improved facilities for Non Motorised Users.

PQ39. Which, if any, of the road improvements listed in policy 13 part A and Table 7 are essential to (a) facilitate development proposed in the Plan, and (b) address highway safety during the Plan period?

Council response - There are 2 schemes included that are considered as being essential to facilitate development proposed in the plan. Hatfield Link Road is currently under construction and is a partnership between the Council, the Sheffield City Region, Waystone Limited and Homes England. The main contractor for the link road is Balfour Beatty. The total cost of the project is around £16.7million and due to be opening in summer 2020. The new link road will enable the wider Unity Project (Policy 70) to come forward. The West Moor Link (A630) improvements are also currently being delivered and the modelling has identified that it can accommodate the proposed development in the local plan. None of the schemes are included specifically to address highway safety, although it is an underlying assumption that all new infrastructure schemes will result in improvements to highway safety.

Open Space and Local Green Space

PQ40. To be clear and consistent with policy 28 part D, should part A refer to “open space policy areas” (rather than “the open spaces”)?

Council response – Yes, the Council agrees that this change (i.e. adding the words ‘policy areas’) to Policy 28 part A would provide clarity and would like to suggest that this could form the basis for a Main Modification to the plan (new policy wording identified in red).

Within the open space policy areas as defined on the Policies Map, proposals for the creation and enhancement of sports and recreation facilities will be supported, where:

PQ41. Policy 28 part C protects Local Green Space defined on the Policies Map in accordance with national policy, and paragraph 10.17
refers to a number of areas having been identified by local communities. Please provide a list and maps of all Local Green Spaces designated on the Policies Map, and give a brief summary of the justification for each in terms of the criteria in NPPF paragraphs 99 and 100. To be effective, should policy 28 part C or the reasoned justification refer to the specific areas of Local Green Space designated on the Policies Map?

**Council response –** The Local Green Space - Methodology and Sites evidence base document (SDEB20) identifies the ‘local green spaces’ that have been assessed and includes the 3 sites proposed for allocation (see paragraph 1.37 of the document). The methodology in the document is in two parts and takes account of national guidance and a localised interpretation of the NPPF Local Green Space policy (paragraphs 99 and 100).

The national policy context is discussed in paragraphs 1.5 to 1.12 of SDEB20. The first part of the assessment provides a site description, ownership, submission information, existing designations/permissions, ‘other call for sites reps’ and criteria for evaluating distance, size, connectivity, defined boundary and ‘how the site feels’. The second part takes account of and considers beauty, historical significance, recreational value, tranquillity, wildlife and ‘other’ in line with paragraph 99 and 100 (see paragraph 131 of SDEB20). Appendix A of SDEB20 also provides a ‘Local Green Space Allocation Process’ for guidance.

The three local green space sites proposed for allocation are shown below in Table PQ41 (with summary) and the maps are identified on page 3 onward. The full assessments of all 20 submissions can be found in Appendix D of SDEB20.

**Table PQ41: Local Green Space Sites Summary**

<table>
<thead>
<tr>
<th>Site no.</th>
<th>Site name and summary</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>162</td>
<td>West Farm Fields between High Road and Low Road West, Warmsworth</td>
<td>Warmsworth</td>
</tr>
<tr>
<td></td>
<td><strong>Summary of reasons for designation.</strong></td>
<td></td>
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<tr>
<td></td>
<td>Close community proximity</td>
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<td></td>
<td>Good connectivity</td>
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<tr>
<td></td>
<td>Area is not an extensive tract of land</td>
<td></td>
</tr>
<tr>
<td></td>
<td>‘Feels local in nature’</td>
<td></td>
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<tr>
<td></td>
<td>Well defined boundary</td>
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<tr>
<td></td>
<td>The Parish Council state that the site is a remnant of the previous rural / agricultural nature of Warmsworth, and serves as an important reminder of the history of the area. The site provides a visual break between the conservation area and newer developments. This view is supported by the council’s Conservation Officer.</td>
<td></td>
</tr>
<tr>
<td>489</td>
<td>Land rear and side of Poplar Farm, Sutton Road, Campsall.</td>
<td>Campsall</td>
</tr>
<tr>
<td></td>
<td><strong>Summary of reasons for designation.</strong></td>
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<tr>
<td></td>
<td>Close community proximity</td>
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<td></td>
<td>Good connectivity</td>
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<td></td>
<td>Area is not an extensive tract of land</td>
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<td></td>
<td>‘Feels local in nature’</td>
<td></td>
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<tr>
<td></td>
<td>Well defined boundary</td>
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<tr>
<td></td>
<td>Views are available from the south across the open space formed by the proposed green space towards the elevated historic core of the village of Campsall and the medieval church. The historic connection between the village and the agricultural landscape is thus particularly evident here, as is the historical functional relationship of the farmstead to its land and its separation from the main body of the village. The open space</td>
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</tr>
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</table>
also provides a pastoral setting for the small cottages on Back Lane. It therefore makes a significant positive [contribution] to the conservation area.

<table>
<thead>
<tr>
<th>1015</th>
<th>Cardwell Court, Braithwell</th>
<th>Braithwell</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Summary of reasons for designation.</strong></td>
<td>Close community proximity</td>
<td></td>
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<td></td>
<td>Good connectivity</td>
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<td></td>
<td>Area is not an extensive tract of land</td>
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<td></td>
<td>‘Feels local in nature’</td>
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<td></td>
<td>Well defined boundary</td>
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<tr>
<td>The Parish council submitted information stating that the site is visually attractive and a “real feature of the village of Braithwell”. They add that the site is a scene of tranquillity when viewed especially from the church and play park, and that the site contributes to the character and appearance of the historical setting of the church and manor house.</td>
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<tr>
<td>The council’s Conservation Officer states the field is an important component of the character of the conservation area and contributes to the setting of listed church and Manor Farm and with its limestone boundary walls has some intrinsic historic character. The mature trees within the field also contribute to views towards and from the churchyard which both in their own right and in combination with the church have some aesthetic quality. Designation as green space can be supported for historic and aesthetic reasons.</td>
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</tbody>
</table>

Please note, the Council is already suggesting a change to paragraph 10.17 in the Local Plan to identify the three sites (should this be acceptable to the Inspector – new wording in red and deleted text struck through and black).

'These three areas sites ('West Farm Fields, off Low Road West', 'Sutton Road, Campsall' and 'Cardwell Court, Braithwell') are also identified on the Policies Map as Local Green Space in line with the 'Local Green Space Methodology and Sites’ evidence base document.’

The Local Green Spaces have also to be clearly identified on the Local Plan Policies Map (CSD4). The following 3 maps (Maps PQ41a-c) also show these sites as requested, but please also now note the suggested change to Poplar Farm, Sutton Road, Campsall (Map PQ41b) set out after these first set of plans.
Map PQ41a: West Farm Fields, High Road/Low Road West, Warmsworth

Map PQ41b: Poplar Farm, Sutton Road, Campsall
As part of preparing the Council’s response to the PQs, it has come to our attention that there has been an error when mapping the boundary to site 489 (Poplar Farm, Sutton Road, Campsall) and as such, the Council would like to propose a Main Modification. The Local Green Space evidence base makes it clear that site 489 refers to the larger field in this location (a portion of which was also submitted separately as site 339). See the Local Green Space – Methodology and Sites evidence base (Appendix B Table 1 and Appendix D - SDEB20) for clarification of this. However, when preparing the Local Plan Policies Map (CSD4), site 489 has been incorrectly mapped excluding the land to the north of the site, which was simultaneously submitted as 339, when the proposal reflects the whole site.

To correct this error requires an amendment to the Local Green Space boundary and Residential Policy Area boundary of the supporting Policies Map (CSD4). Map PQ41d shows the 2 land use designations as per the current Policies Map, and Map PQ41e shows how they should be shown.
Map PQ41d: Current Extent of Poplar Farm Local Green Space Designation.

Map PQ41e: Proposed Amendment to Extend Poplar Farm Local Green Space Designation (with Consequential Reduction to Residential Policy Area extent).
PQ41. (a) What is the justification for policy 29 referring to development proposals addressing deficiencies in open space provision? (b) Are the requirements in parts A to E intended to make up for existing deficiencies to benefit the wider community, or to meet the needs of future residents of the development site in ways that take account of existing deficiencies in the local area?

**Council response** – The Council would like to address part (b) of this question first. The requirements of Policy 29 (parts A to E) are intended to deliver benefits for future residents in the first instance, but the wider community may also benefit dependent on the type of open space provided. The provision will not make up for deficiencies in a wider community; it will however prevent the deficiencies from getting worse. Where communities in the borough already have sufficient provision a contribution may still be deemed appropriate, as quantitative deficiencies may not be an issue but access may be. To address local need in each community area a percentage contribution would be required for each of the different type of open space - see Table 2 (page 8) of the Green Infrastructure & Open Space Topic Paper (DMBC6). This is neither practical nor affordable for a developer, as it would equate to around 55% of the site. The Green Space Audit (SDEB18) will therefore be used to determine the most appropriate type of provision (need) for each development.

In response to part (a) of the question, the Council would like to suggest changes which could form the basis of a Main Modification to the text of Policy 29 and delete the words ‘and deficiencies’ and reference to the lower (10%) percentage requirement in part A of the policy; suggested deletions as set out below (struck through text and in black). This will avoid doubt and confusion. Subsequently a number of other consequential amendments will be required if these suggested changes are taken forward, for example Policy 27: Green Infrastructure.

<table>
<thead>
<tr>
<th>To address local green (open) space needs and deficiencies, development proposals:</th>
</tr>
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<tbody>
<tr>
<td><strong>A)</strong> 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.</td>
</tr>
<tr>
<td><strong>B)</strong> 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.</td>
</tr>
<tr>
<td><strong>C)</strong> 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.</td>
</tr>
</tbody>
</table>

...continued as per the rest of Policy 29
The justification for the policy relates to the 2013 Green Space Audit (SDEB18), which provides the evidence for the application of planning conditions and obligations (in line with NPPF paragraphs 55 and 56). The Audit identifies and measures provision for five different types of open space for each community in the borough. The Audit identifies all greenspaces, sports and recreational facilities in the borough. The Audit also measures the provision for different types of open space using various standards (see paragraphs 39, 40 and Table 2 of the Topic Paper (DMBC6) for clarification. The Audit (and subsequent updates) is essential for the Council to plan positively for the provision of open space in line with NPPF paragraph 92a. NPPF Paragraph 96 also says authorities need a robust and up-to-date assessment of open space and recreational provision including surpluses and deficit. It goes on to say ‘Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate’. The policy endeavours to do this by the application of different values of open space requirements in the various communities.

The proposed modified policy will allow the Green Space Audit (and subsequent updates) to be used in planning applications, by identifying the existing open space provision in the various communities and identifying where needs arise. The evidence allows the Council to make decisions to show the obligation is necessary to make the development acceptable by meeting the needs of the occupants, by providing the correct type of open space provision, within the development or within reasonable distance where the occupants will benefit.

Subsequently the supporting text will also require modification. The Council is now proposing to that the amendments proposed in the Schedule of Suggested Changes to the Local Plan Publication Version (CSD5) are superseded by the suggested changes to support the modified policy as set out above with new text shown in red and deleted text struck through and in black. These are:

**Paragraph 10.21**

10.21. National planning policy states access to high quality open spaces and opportunities for sport and recreation makes an important contribution to the health and well-being. The policy is supported by a robust and up-to-date Playing Pitch Strategy and Green Space Audit, which identifies open space, sport and recreation facilities and opportunities for new provision. Where these documents identify localised needs deficiencies, a higher value of on-site provision or commuted sum will be required...

**Paragraph 10.22**

10.22. The policy indicates that proposals must address open space needs and deficiencies with developments of 20 family dwellings or more, providing either 10 or 15% of the red line boundary as on site open space per family dwelling. In areas that need deficient in children’s play space (informal open space) this the provision of children’s play space will be the highest priority. On smaller development proposals the emphasis may wholly be on the provision of children’s play space (see below). On larger applications where green space provision will equate to 0.4 hectares or
more the type amount of open space to be provided should consider be broken down into a minimum of 32% on-site open space suitable for children’s play in the first instance 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. Ultimately the nature and type of open space will be determined by having regard to the most up to date Green Space Audit, Playing Pitch Strategy and Green Infrastructure Strategy. Where deficiencies are identified in the audit, 15% on-site open space provision will be required.

Paragraph 10.23

10.23. The Green Space Audit identifies a number of different standards and associated open space needs deficiencies within our communities, taking account of five different open space types including: formal and informal open space, allotments, public parks, woodlands and nature conservation areas.

Paragraph 10.30.

**Addressing Open Space Needs Deficiencies and Priorities**

10.30. The Council will liaise with developers to agree area specific priorities for development proposals having regard to open space needs deficiencies and priorities within a community as identified in the latest Green Space Audit.

Paragraphs 35 to 41 in the Green Infrastructure & Open Space Topic Paper (DMBC6) explains there is no one nationally adopted standard for the provision of open space and there are a multitude of different ways to calculate open space requirements for development proposals. All these organisations are reputable and acceptable sources of information and guidance with regards to their respective areas of green space specialism. The percentage requirement is a simple and clear way in which a developer can work out from the outset what the contribution will be. To avoid confusion therefore the Council will standardise the developer requirement to 15% on-site provision or equivalent value as a financial contribution. Commuted sums will be used to enhance existing open space and green infrastructure ‘in the vicinity of’ the development site. This distance varies with the type of green space or green infrastructure – see accessibility standards in the 2013 Green Space Audit (SDEB18) and Table 1 (paragraph 19) of the Topic Paper (DMBC6).

PQ42. Policy 41 provides protection to buildings and structures of local historic interest. Paragraph 11.40 refers to Appendix 10 which sets out criteria that will be used to decide which buildings and structures the policy will apply to. (a) Are those criteria still “draft”? (b) If so, what is the purpose of including them in the Plan?
**Council response** - In previous consultation versions of the Local Plan these criteria have been included for comment. Since then the Civic Trust has trialled the selection criteria for the Council with a small number of sites outside the conservation area. From this the Council has concluded that the selection criteria is a valid and usable method for identifying buildings and structures of local historic interest. As the Council is satisfied with the criteria in Appendix 10 the word ‘draft’ should be removed from the title but the Council has omitted this from the schedule of minor amendments (CSD6) but would like to make an additional amendment to allow this. There is also a consequential amendment required to the explanatory text at paragraph 11.40 to remove the word ‘draft’ from the fourth sentence. The process of establishing the list will still require consultation as explained in paragraph 11.41. The criteria for the Locally listed buildings in Appendix 10 complements the criteria for selection of Parks and Gardens of Local Interest in Appendix 9 and rounds off how undesignated heritage assets are to be identified which is part of our positive strategy for the historic environment.

**Backland and Tandem Development**

PQ43. Policy 45 part C states that, in particular, Bessacarr, Sprotbrough and parts of Thorne Road at Edenthorpe will be “protected from” backland and tandem development. (a) How is that intended to be taken into account by a decision maker; (b) what are the specific geographical areas to which that part of the policy applies; and (c) what is the justification for identifying those particular areas?

**Council response** – In respect to part (a) of the question, the aim was to identify these areas as being under particular pressure from backland and tandem development and particularly important to preserve their prevailing characteristics. This would be managed and delivered through the application of the other parts of the policy criteria and other policies within the plan i.e. those that seek to maintain character. The aim of part C is to highlight there should be a general presumption against further backland/tandem development in these areas, as the nature of that form of development could be considered incongruous to their character.

Using the words ‘protected from’ was to express a clear statement of intent. However, it is appreciated with hindsight the wording in part C and 12.21 could be perceived as overly restrictive and there may be some instances where backland/tandem development may be able to retain the character of these areas, albeit this is likely to be only in exceptional circumstances. If the Inspector considers it necessary, the wording within Part C could be amended through a Main Modification to read as follows (new text in red and deleted text struck through and in black).

In particular, the prevailing character of parts of Bessacarr, Sprotbrough and parts of Thorne Road at Edenthorpe, as defined on the Policies Map, will be protected from further Backland and Tandem development.

In respect to part (b) of the question, it is appreciated that the exact geographical areas highlighted in part C should be more clearly defined and the
Council’s opinion is that this is best achieved through showing the detailed boundaries of the 4 areas as designations on the Policies Map (CSD4). Please refer to the following plans (Maps PQ43a-d) which show the specific areas of Bessacarr, Sprotbrough and Thorne Road, mentioned in the policy, and which are now suggested to be additional designations on the Policies Map (CSD4). The revised policy wording set out above also makes this clear.

**Map PQ43a: Bessacarr**

**Map PQ43b: South Bessacarr**
Map PQ43c: Sprotbrough

Map PQ43d: Thorne Road, Edenthorpe
In response to part (c) of the question, NPPF paragraph 70 states that ‘plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area’. The specific parts of the Borough identified under part C are characterised by mature suburbs with leafy, low density, spacious, villa and semi-detached development often with exceptionally large or long gardens. They represent a specific character typology which is not widespread within the Borough and therefore require sensitive management. These areas often cater for aspirational ‘executive’ homes which are not widespread elsewhere, but are important in supporting the economic aspirations of Doncaster by providing housing of a type and density the modern market is unlikely to deliver in significant numbers, so to a degree irreplaceable. Increasingly these areas are coming under pressure for infill and backland development which is negatively changing the character of the areas and reducing this specific type of aspirational housing offer as explained in the text at paragraph 12.21.

The areas in Bessacarr identified above also broadly correlate to the existing 2 Conservation Areas. There is another area in Bessacarr outside the Conservation Areas which until relatively recently shared similar characteristics to those identified. This area is defined by Bawtry Road/Grange Road/Partridge Flat Road/Plumpton Park Road (see Map PQ43e below). It has had significant redevelopment including a larger number of backland and tandem developments, which have altered the prevailing character to such a degree that these forms of development could now be considered part of the character of that specific area. For this reason it has been excluded from the inset maps above. This change in character has taken place despite having UDP policy and an adopted Residential Backland and Infill SPD which aimed to better control this form of development. It demonstrates what is likely to happen to the other areas identified under part C without a clearer protectionist policy approach in the Local Plan.

Map PQ43e: Bawtry Road/Grange Road/Partridge Flat Road/Plumpton Park Road, Bessacarr Character Area
Part C aims to better manage the pressure for this form of development in the identified areas so that the existing prevailing character is maintained in line with NPPF paragraph 70. The aim of part C is to highlight there should be a general presumption against further backland/tandem development in these areas as by their nature that the form of development could be considered incongruous to the prevailing character of the areas referred to. It will allow the Council to better manage the possible piecemeal erosion of the character of the areas highlighted.

This is the logic reflected in an Inspector’s recent decision for a backland proposal at Warnington Drive, Bessacarr which is one of the character areas highlighted in part C.

Despite my conclusions regarding the above, the proposal comprises an uncharacteristic tandem form of development on the appeal site. Whilst I recognise that it would appear historically that other backland redevelopment or infill developments have taken place within the area covered by the South Bessacarr Conservation Area, there is no evidence of a prevalence of such piecemeal or tandem development elsewhere in the vicinity. I accept that there is a certain degree of variation in plot sizes and widths across the wider Conservation Area, but there remains an absence of development within the long rear gardens of properties on the Northern side of Warnington Drive. This retained area of openness is a positive spatial characteristic of the SBCA, and to allow its erosion would result in an undoubted adverse impact on the existing openness of the appeal site, and the Conservation Area (Paragraph 10, 19/00023/REF - Appeal Dismissed - 27.03.20).

Likewise in another recent decision for a backland development at Park Drive, Sprotbrough (which is another of the areas highlighted in part C) the Inspector found that the proposals ‘would be an intrusion of development that would be harmfully at odds with the prevailing character and pattern of adjacent residential plots that form the immediate and overriding context of the appeal site’ (Paragraph 6, 19/00021/REF - Appeal Dismissed - 03.04.20).

Edenthorpe and Sprotbrough Neighbourhood Plans are being progressed and both include policies and proposals relating to maintaining the character of the respective identified areas under part C.

As set out in the response to PQ5 above, the Edenthorpe Neighbourhood Plan Submission Version (2019) has been recommended to proceed to referendum. It highlights the Thorne Road character area as being important to residents who were keen to see the character maintained (8.23), the Neighbourhood Plan Policy 5 is included to help manage this.

The Sprotbrough Neighbourhood Plan is at Regulation 14 (Pre-Submission Consultation and Publicity) stage. The first draft plan (Autumn 2018) includes a section relating to Backland and Infill development (paragraph 82) which describes the pressures and issues the community are experiencing from this form of development, and a draft policy with relevant design criteria which aim to better manage it. It is noted some of the criteria in the draft policy are quite restrictive and will be difficult for any backland/tandem development to achieve.
e.g. criteria 3 and 4 which say: 3. The proposed building plot is of similar dimensions, in size and shape to the existing plots within the immediate locality. Proposals that would lead to over-development of a site or the appearance of cramming or tandem development generally will be resisted. 4. The site layout reflects the original development of the area. This is particularly important within older established residential areas where a uniformed plot layout and street-scene has been created.

**Noise**

PQ44. Policy 55 indicates that when determining planning applications, particular consideration will be given to noise. Paragraph 13.20 states that guidance in the accompanying Noise Annex will be applied. A minor amendment clarifies that the Annex is actually Appendix 11 in the Plan. This sets out specific thresholds, and states that they will be applied to determine the acceptability of proposals. Should the second sentence of policy 55 part B be modified along the lines of “A noise assessment will be required ... planning application, and this should have regard to the thresholds set out in Appendix 11”?

**Council response** - As set out in paragraph 1.14, all the policies in the Local Plan should be read together and in conjunction with any other material considerations when determining planning applications e.g. the ‘planning balance’ judgement of other issues which will be a matter for the decision maker. Applicants/developers are directed to Appendix 11 via paragraph 13.20 for the relevant standards required for Policy 55, part B. The Council is amenable to amendments as suggested by the Inspector to direct applicants and developers via the Policy which could be the basis for a Main Modification to the plan.

**Wind Energy Development**

PQ45. Is the Area of Search for Wind Energy Development defined on Figure 13 in the Plan based on relevant and up to date evidence having regard to national guidance\(^{30}\)? In particular, does the landscape capacity assessment take appropriate account of changes to the landscape that have occurred since 2006/7, including through the introduction of wind turbines?

**Council response** – Evidence for the Area of Search is described in the Wind Energy Development Policy Evidence Base Document (SDEB12).

As is suggested under PPG\(^{31}\) the Council had independent renewable energy assessments undertaken. The Doncaster Renewable and Low Carbon Energy Study (SDEB11) explored the technical potential for ‘large scale’ wind energy developments. The term ‘large scale wind’ describes the development of commercial scale wind turbines and wind farms. These typically comprise turbines of 1 MW or more with hub heights of circa 80-100m or more. To be considered commercially viable, wind speeds greater than 6.0m/s at 100m are

\(^{30}\) PPG ID: 5-005-20150618.

\(^{31}\) PPG ID: 5-005-20150618
needed. The majority of Doncaster has high enough average annual wind speed to exceed this. However, there are a number of other practical, social and environment constraints that need to be considered. The process of physical constraint mapping in the study has been used to identify which sites are likely to have potential for locating large-scale wind turbines.

As the PPG states, landscape character is important as it often informs much of the debate around wind development. There are eight principal landscape types in Doncaster separated into 20 Landscape Character Areas (LCAs). The Doncaster Landscape Character Assessment (SDEB36) highlights potential areas of moderate landscape sensitivity where wind power schemes may be more suitable. It also highlights that most of the Borough will be sensitive to such development with low to no capacity for wind power developments.

None of the Borough was identified as having high landscape capacity for wind power development. Parts of two Landscape Character Types were identified as being of moderate capacity. These are the ‘Cadeby to Adwick Limestone Plateau LCA’ and the ‘Carcroft to Norton Limestone Plateau LCA’ of the Magnesian Limestone Landscape Type; and the flood plain surrounding the former Thorpe Marsh Power Station (constituting the ‘West Don and Don River Carrlands LCA’ of the River Carrlands Landscape Character Type.

However, the Magnesian Limestone areas are located within the Green Belt where development is only permitted under ‘very special circumstances’. As well as being Green Belt, the limestone ridge areas identified contain a number of important country houses and parklands as well our distinctive limestone villages.

Elsewhere, extensive parts of the Borough are considered to have low landscape capacity for wind turbines. Omitting these areas reduces the theoretical land available for wind development.

Therefore, the designated ‘Area of Search for Wind Energy Developments’ shown on the Policies Map (CSD4) focuses on directing medium-scale to large-scale wind turbines to the less sensitive location within the Don Flood Plain (the area identified as the ‘West Don and Don River Carrlands LCA’32).

The PPG states that ‘when identifying suitable areas it is also important to set out the factors that will be taken into account when considering individual proposals in these areas’. The criteria of Policy 60 set out these factors.

It is important to emphasise that whilst landscape character and capacity was an important consideration informing the chosen areas of search, other factors such as impact on Green Belt, heritage assets and natural conservation areas were also considered and that is why alternative areas of search were not progressed.

The landscape capacity assessment does not take account of changes to the landscape that have occurred since 2006/7, including through the introduction of

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32 In Flood Zone 3b (functional floodplain) essential infrastructure such as wind turbines has to pass the exceptions test to show that it will provide wider sustainability benefits to the community that outweigh flood risk. Proposals will need to show how the development will remain operational at times of flood, and that it will be safe for its lifetime, without increasing flood risk elsewhere in line with the requirements of Policy 58.
wind turbines. It was the best and most up to date data/evidence available to the Council on which to base the policy.

There is an argument being put forward by representatives who are advocating alternative areas of search, that this makes the entire landscape assessment out of date. As landscapes are not subject to radical change over time, the Council do not consider there is a need for a completely updated landscape assessment and and in any case, the selected area of search was not based solely upon consideration of landscape impacts.

However, the Council recognises that the Inspector needs to be satisfied that the geographical area of the Area of Search is justified and based on up-to-date evidence to enable the policy to be found ‘sound’. The Council is therefore commissioning an update to the existing assessment focusing upon specific areas, including where wind energy developments have been completed since 2006/7. The Council will make this evidence available as soon as possible to feed into the remainder of the Examination.

Agricultural Land

PQ46. (a) Is the reference to “overriding need” in policy 61 consistent with NPPF 170(b) and footnote 53? (b) Would compliance with part E of policy 2 (residential development adjacent to development limits of level 1-3 settlements when a five year supply of housing cannot be demonstrated) be likely to be sufficient to demonstrate “overriding need”?

Council response - To ensure that Policy 61 is consistent with NPPF 170(b) and footnote 53 it is suggested that a Main Modification be proposed to delete Part A1 of Policy 61 (with consequential renumbering of parts A2 and A3).

Glossary

PQ47. Are all of the definitions in Appendix 1 to the Plan consistent with those in the NPPF?

Council response – The Glossary has been reviewed and the Council now proposes the following changes. These are made to ensure consistency of some of the glossary items with the NPPF; to improve the wording of others; and to delete some which are not considered necessary to retain.

Affordable Housing. Amend to read:
Homes for people who are unable to access or afford market housing (for example vulnerable people and key workers) and includes social rented, affordable rent and intermediate housing. Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or if for essential local workers); and which complies with one or more of the detailed definitions set out in NPPF. See Policy 8.

Brownfield Land. Amend to read:
See Previously Developed Land. Land that is or was occupied by a permanent structure.

Building for Life. Amend to read:

Colliery Spoil. Delete.

Conventional Hydrocarbons. A change is already proposed in CSD5.

Cultural and Civic Quarter (CCQ). Amend to read: Cultural and Civic Quarter (CCQ): The new development in Doncaster town centre to house all council offices along with major new development uses such as housing, leisure and open space.

East Coast Main Line. Delete.

Greenspace. Amend title to read: Greenspace

Heritage Asset. Amend to read:
A building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. Heritage assets are the valued components of the historic environment. They include designated heritage assets such as listed buildings, conservation areas, historic parks and gardens and archaeological remains as well as assets identified by the local planning authority during the process of decision-making or through the plan-making process (including local listing).

Heritage significance. Amend to read:
The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence but also from its setting. sums up the qualities that make an otherwise ordinary place a heritage asset and justifies a level of protection in planning decisions.

Hydraulic Fracturing (commonly known as fracking). Amend to read:
The fracturing of rock under hydraulic pressure regardless of the volume of fracture fluid used. The process of opening and/or extending existing narrow fractures or creating new ones (fractures are typically hairline in width) in gas or oil-bearing rock, which allows gas or oil to flow into wellbores to be captured.

Local Enterprise Partnership (LEP). Amend to read:
See Sheffield City Region. The LEP is based on a relationship between the public and private sector and a strong commitment to work together to ensure the growth of a rebalanced local economy. The LEP will be led by the private sector and will contribute significantly to the renewal of the national economy as a whole. A body, designated by the Secretary of State for Housing, Communities and Local Government, established for the purpose of
creating or improving the conditions for economic growth in the Sheffield City Region.

Local Housing Assessment. Amend to read:
Local Housing **Need** Assessment
Assessment of local housing need in Doncaster that informs policy on affordable housing. **The number of new homes identified as being needed through the application of the standard method set out in national planning guidance, or a justified alternative approach.**

Local Transport Plan. Delete.

Nature Recovery Network. Amend to read:
The Nature Recovery Network is a major commitment in the UK Government’s 25-Year Environment Plan, and in proposed legislation at the time of plan preparation, intended to improve, expand and connect habitats to address wildlife decline and provide wider environmental benefits for people. **An expanding, increasingly connected, network of wildlife rich habitats supporting species recovery, alongside wider benefits such as carbon capture, water quality improvements, natural flood risk management and recreation. It includes the existing network of protected sites and other wildlife rich habitats as well as and landscape or catchment scale recovery areas where there is coordinated action for species and habitats.**

Neighbourhood Plan(ning). Amend to read:
Introduced by Localism Act 2011. **A plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area.** Can be prepared by local communities setting out local planning policy to help determine planning applications. **In law this is described as a neighbourhood development plan in the Planning and Compulsory Purchase Act 2004.** Must be in general conformity with Strategic Policies of the Local Plan. See Chapter 1.

Previously Developed Land
Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

Renewable Energy. Amend to read:
Energy which comes from natural resources such as sunlight, wind, rain, tides, and geothermal heat, which are renewable (naturally replenished). **Includes energy for heating and cooling as well as generating electricity.** **Renewable energy covers those energy flows that occur naturally and**
repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat.

Sequential Approach. Amend to read:
Considering options for sites for development in a particular order. For example, in terms of new shops, we would first look for sites within a shopping centre and then for sites on the edge of the shopping centre before looking at sites outside the centre. The same approach is applied to finding land at lowest risk of flooding for housing most types of development before support is given to sites at medium-high risk.


Strategic Environmental Assessment (SEA).
This term is used internationally to describe the environmental assessment of plans, policies and programmes. This environmental assessment (the SEA Directive) looks at the effects of certain plans and programmes on the environment. A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment. See Sustainability Appraisal.

Supplementary Planning Document (SPD). Amend to read:
Not part of the statutory Development Plan but can provide more detail on the development of individual sites (Planning Briefs) or the operation of certain policies—Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

Sustainability Statement. Deletion is already proposed in CSD5.

Unconventional Hydrocarbons. A change is already proposed in CSD5.

Windfalls. Amend to read:
Sites for new housing that are not identified when allocating land in a development plan document but that may come forward for development during the Plan period. For example, the redevelopment of former industrial premises following unanticipated closure or relocation of a business—Sites not specifically identified in the development plan.