

	Summary of issue raised	Response
Gladman Developments General	<p>Relationship to the Local Plan – Core Strategy determines that Doncaster’s housing target is 920dpa. It was originally 1,230 dpa as per the RSS but this was found to be non-NPPF compliant as it was not objectively assessed.</p>	<p>The Core Strategy sets the housing target at 1,230 dpa. Subsequent Housing Needs Assessments (both produced by the Council in 2015, and Peter Bretts Associates in 2018) arrived at a figure of 920 / 912 (which we have left as 920dpa)). 920dpa is the target for the emerging Local Plan, which includes the standard methodology figure plus an economic uplift. For 5 year supply purposes, we defer to the Standard Methodology (most recent figure 550dpa). In the emerging Local Plan, the requirement is proposed to be expressed as a range from 585 – 920 dpa (585 being the original Standard Methodology Figure).</p>
	<p>Policy 1 – object to the use of development boundaries. These preclude otherwise sustainable development from coming forward. The framework is clear that sustainable development should proceed. Settlement limits arbitrarily restrict suitable development coming forward. Greater flexibility is required.</p>	<p>This approach mirrors the UDP and Core Strategy in defining a differentiation between urban / countryside, but uses the emerging Local Plan method of defining development limits to draw a boundary.</p> <p>The UDP differentiates between urban / built up areas, with land beyond being in the countryside, and UDP policies ENV2 and ENV4 seek to protect this Countryside Policy Area. Core Strategy Policy CS3 also seeks to protect and enhance the countryside and shows land beyond the built form development limits as Countryside Protection Policy Area, however the urban / rural limits are defined in detail in the UDP. The Neighbourhood Plan proposals reflect this.</p> <p>The emerging Local Plan consulted on a strategy for defining settlement limits in Autumn 2018, and put the principals into practice when drawing a settlement limit around Edenthorpe in the Local Plan publication draft. In practice, this only really effects Edenthorpe in isolation to the east, as to the north and west of the Parish boundary is built form / non countryside, and to the south is the A630. Edenthorpe is part of the wider ‘Main Urban Area’, so the overall boundaries extend around the larger urban form.</p> <p>The Council liaised with the Neighbourhood Plan group about the proposed development limits and it was agreed the Neighbourhood Plan group would use the then development limit methodology to interpret their own boundary. This mirrored the Council’s interpretation, which excluded land to the east of the</p>

		<p>built form (known as Mere Lane). It is, however, important to note that some of the land to the east of Edenthorpe was granted permission on appeal for c. 600 houses in 2018. The settlement boundaries exclude non – complete permissions to replicate the situation ‘on the ground’, however it is expected development will come forward to the east, on land defined as countryside.</p> <p>Policy 2 in the emerging Local Plan provides flexibility in that the countryside could be developed in in the event the borough cannot demonstrate a 5 year supply of housing, and subject to other caveats.</p> <p>The Council is satisfied that the Neighbourhood Plan is therefore well aligned with the Local Plan (existing and emerging) on this matter, and the principal of defining an urban / rural differentiation for planning purposes is well established.</p> <p>The approach taken in the Neighbourhood Plan also reflects consultation with the community. Policy 1 focuses on sustainable development and regeneration within the village. It should also be noted that alongside the greenfield Mere Lane permission, there is another large permission on the Hugerhill site within the settlement limits. Collectively, Edenthorpe is earmarked to deliver over 1000 homes in the Local Plan, a significant amount of the Main Urban Area requirement.</p>
	<p>Policy 3 – housing needs change over time and this should be made more flexible by adding the wording “this should be evidenced by an up to date assessment”...</p>	<p>The Neighbourhood Plan has consulted with the local community and undertaken research on housing provision in the settlement. It made an assessment of the needs of the area and finds the results to be in conformity with what would be expected from population projections. The policy appears sufficiently broad enough to cover a range of needs and is not overly onerous in what it is asking. The boroughs Housing Need Assessment will be periodically updated, which will provide new detail to inform the policy or applicants, alongside the Neighbourhood Plan. The 2019 Housing Needs Survey shows that there is a need in the Main Urban Area (where Edenthorpe is located) for 1, 2 and 3 bedroom units. The Policy asks that developers show they are providing a range of types and sizes to meet a range of needs. This is in line with Core</p>

		<p>Strategy Policy CS12 and furthermore will also be covered by Policy 8 of the emerging Local Plan.</p>
	<p>Policy 5 – The wording should be more flexible and avoid being over-prescriptive in order for schemes to respond to specifics and character of the local area. There should be no one size fits all solution. More flexible wording should be provided to ensure high quality and inclusive design is not compromised by aesthetic requirements alone. To do so could impact on viability.</p>	<p>The Council’s design officer believes the Plan is strong on design matters. We believe the principles are in no way overly onerous, do not seek to be over prescriptive on design (for example, no mention of materials), nor do they seek to tie developers to one approach. It is unclear how these would impact on the viability of schemes, and the point about local reacting to local distinctiveness is specifically covered throughout the policy. The criteria raised in the Neighbourhood Plan are all reasonable and furthermore, as the text proceeding the policy shows, have been thoroughly considered (including also criteria raised in Policy 1). The policy is therefore in response to the matters which are important to the local community, but sufficiently broad enough to not be a “one size fits all” approach as suggested.</p>
	<p>Policy 7 – Local Green Space – NPPF para. 100 notes these will not be appropriate for most areas or open space. The designation should only be used where they can show the requirements are met – close in proximity; demonstrably special and local in character. Para. 100 also notes sites should not be an extensive tract of land. As such, Long Plantation should not be allocated as Local Green Space. Other neighbourhood plans have had sites ruled out due to being extensive tracts of land and not local. The Parish Council should review the sites and check they meet the requirements. The assessments to not overcome the failure to meet specific policy requirements in the NPPF. There is no evidence these are demonstrably special to the local community. None or of particular scenic</p>	<p>Paragraph 100 does not state that Local Green Space will not be appropriate for most areas, this was in the 2012 NPPF but was amended in the 2019 version. As such, it could be argued that the bar has been lowered for assessing Local Green Space designations. The response highlights two important matters that make Local Green Space designations difficult. Firstly, the framework does not define what is meant by the sections (a) – (c) in para. 100, and secondly therefore this is matter is entirely subjective.</p> <p>In preparing the Local Plan, the Council have prepared a paper which seeks to provide a way of assessing Local Green Space, including an interpretation of para. 100 (a), (b) and (c). This recommends that an extensive tract should be no more than 20ha, that beauty is not always necessarily “natural” or scenic is no more than 5 minutes walk from the settlement. Neighbourhood Plans are under no obligation to follow this way of assessing Local Green Space, but whilst the Council may have come to different conclusions using our methodology, the sites proposed are not contrary to the Council methodology on matters such as distance and size. NPPF para. 99 establishes that this process is about allowing communities to identify and protect green spaces of particular importance to them. The Local Community are best placed to assess what areas of Green Space are significantly important to them and the</p>

	<p>quality. The Policy is not in accordance with the basic conditions and should be revisited.</p>	<p>Neighbourhood Plan provides its own assessment and justification of Local Green Space in Edenthorpe.</p> <p>In addition, the development of the Neighbourhood Plan involved a number of public consultation periods where local residents either identified the green spaces illustrated within the Plan or they supported their inclusion as a Local Green Space.</p> <p>All the spaces identified are used for recreational purposes whether that is walking, for sporting activities or play.</p>
	<p>Concerned that the plan does not meet basic condition (a) conformity with national guidance, and contrary to (d) the making of the order contributes to the achievement of sustainable development for reasons set out above.</p>	<p>It is hoped that though the above explanations, these fears are allayed. The Council is satisfied the plan is not contrary to national guidance and believe it suitably contributes to the achievement of sustainable development in the area through infilling, regeneration or through the development of existing sites within the development limit. There is no requirement for a Neighbourhood Plan to allocate sites.</p>
NHS Property Services	<p>Policy 8 – suggested policy wording amendment for 8 (2) to include “Proposals for their redevelopment or change of use to other purposes, will not be supported unless alternative community facilities are proposed as part of the development concerned, <i>or sufficient services/facilities for that type of infrastructure are provided</i>, or that it can be demonstrated that the existing use is unviable.” This will allow NHS estate strategies to be implemented effectively and help the NHS deliver services where needed without being tied to an existing location.</p>	<p>No objection to the inclusion of this sentence, although it may be considered that the following sentence effectively covers this, in that the use could be unviable if sufficient alternative facilities exist.</p>
Severn Trent	<p>Policy 1 – The policy should refer to surface water drainage and SuDS. This should be considered from the outset. The policy</p>	<p>Policy CS4 covers SuDS and this is generally picked up through the planning application process. No objection to including additional wording such as “ it can be served by sustainable infrastructure provision such as water supply, surface water, wastewater drainage, sewage treatment”.</p>

	should also reference the protection of open watercourses.	
	Para 8.11 and 8.12 – Supportive of these paragraphs as they support the delivery of sustainable water management and SuDS.	Support welcome
	Para. 8.16 – there are opportunities to incorporate surface water management into the design of residential street scenes / planting.	Believe this is too specific to be included and in practice not all development will need or be able to do this through design.
	Policy 7 – should support development of flood resilience features on open space provided it does not have a detrimental impact on the primary function of the space. Additional bullet point suggested: <i>“3. The development of flood resilience schemes within areas of local green space will be supported provided that they do not adversely impact on the primary function of the green space.”</i>	Policy 7 seeks to reflect the requirements for Local Green Space as per the NPPF and grant a status akin to Green Belt. As such, we do not believe that the suggestion would fit with the intention of this policy. Policy 6 adequately covers this when it discusses enhancement via development, which is realistically the way in which this would come forward, if it were to.