

COMMENTS FROM JANE STIMPSON DMBC PLANNING POLICY MANAGER - 23 OCTOBER 2013

“Further to the discussions at the Steering Group and following our meeting at the Civic Office I am writing to confirm that it is our opinion the pre-regulation draft of the Armthorpe Neighbourhood Plan has been properly prepared and is in general conformity with the Doncaster Core Strategy.

There appear to be 3 key concerns that have been raised by interested parties who have commented on the draft Plan:

1. The relationship between the Neighbourhood Plan and the Doncaster Sites and Policies Document
2. The conformity with the Core Strategy in terms of:
 - The delivery of housing numbers
 - The location of the green wedge
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3. The lack of evidence base

I will respond to each of these points in turn.

Relationship with Sites and Policies Document

As set out in the report to Full Council (7th March 2013) on the publication of the LDF Sites and Policies Document, paragraph 185 of the NPPF states that, “Local planning authorities should avoid duplicating planning processes for non-strategic policies where a neighbourhood plan is in preparation”. This would seem to suggest that we should simply exclude the areas for which Neighbourhood Plans are being prepared from our proposals map, and that if subsequent NPs are produced in the future, they will effectively redraw the proposals map for the relevant neighbourhood.

With the above in mind, as Armthorpe Parish Council were already preparing a Neighbourhood Plan we did not include any preferred housing or employment sites within Armthorpe parish for the second round of our consultation, to avoid being seen to undermine the Neighbourhood Planning process. However to ensure that the Parish was not left without a plan, we sought delegated authority from Full Council (subject to consultation with the LDF Project Board and relevant Ward Members) to progress an Armthorpe DPD in a timely manner, the content of which would mirror the content as produced by the Parish Council. This document would be progressed through the statutory stages only until the Neighbourhood Plan was adopted (meaning that if the Neighbourhood Plan is delayed we would not be left without a plan for Armthorpe). In our view this approach mitigates the risk of the Armthorpe Neighbourhood Plan being delayed due to unexpected circumstances.

For clarity the recommendation to Full Council on this issue is set out below:

It is recommended that Full Council approve in principal the production of a separate Armthorpe Development Plan Document (focusing on employment and housing sites) with the content to mirror that produced by the Parish Council as part of their Neighbourhood Plan. This document is to be progressed through the statutory stages only until the Neighbourhood Plan is adopted. It is also recommended that

Full Council give delegated authority for the Assistant Director of development to approve the publication version of this document (subject to consultation with the LDF Project Board and relevant Ward Members).

Conformity with the Core Strategy

The Delivery of Housing Numbers

The NPPF indicates at paragraph 184 that, “Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan”. In Doncaster’s case we interpret this to mean the policies within our Core Strategy (which sets out housing targets to settlements, but doesn’t include any strategic site allocations). Policy CS2 of the Core Strategy sets a housing target for Armthorpe of between 646 and 923. The pre-regulation draft of the Armthorpe Neighbourhood Plan identifies two housing sites, which can each provide between 350-400 dwellings. Armthorpe is therefore achieving its housing target. The Parish Council are actively talking to both site owners, who are progressing the schemes.

The location of the Green Wedge

Core Strategy Policy CS17: Providing Green Infrastructure introduces the concept of Green Wedges and explains how they will be used, stating, “ Doncaster’s green infrastructure network (including key green wedges) will be protected, maintained, enhanced and, where possible, extended, based on the principles set out below”. At paragraph 6.27 the CS indicates broad locations where it is “envisaged” GW will be identified, but does not say they “will” be identified in these locations. These envisaged locations are listed in paragraph 6.27 and include, “land to the East of the borough ... between ... Armthorpe and Edenthorpe and Armthorpe...”. The locations of these are shown on map 9 which is titled, “Indicative Green Wedges” with the note on the map “This map is for indicative purposes only”. At paragraph 6.29 it makes it clear that it is not the Core Strategy but a subsequent process that will identify Green Wedges, as it states, “The Proposals Map will provide further detail of the green infrastructure network, including identifying the location of key green wedges”.

The draft Armthorpe NP identifies a Green Wedge broadly in line with the “envisaged” locations shown above, and so is clearly in conformity with the Core Strategy in this regard. The more important question is arguably whether the policies and proposals map will comply with how the Core Strategy sets out Green Wedge should be used. At paragraph 6.28 the Core Strategy states, “Green wedges will overlay Countryside Protection Policy Area /Green Belt designation and areas identified for development. Thus the identification of an area as being within a green wedge would not in itself exempt it from development (although Green Belt/Countryside Protection Policy Area designation would). However, where the green wedge overlays development allocations there will be an expectation that the development must deliver an extensive buffer and an exceptionally high standard of landscaping (to prevent the complete merging of settlements and enhance the amenity and visual appearance of settlement edges), as well as improving access to the countryside etc. They will thus function as a type of green infrastructure corridor with a focus on landscape and amenity”.

The Neighbourhood Plan essentially repeats the above, and so it is clearly not in conflict with the Core Strategy.

The Lack of Evidence Base

As the draft Plan was not at a statutory stage when it was published in August there was no requirement for any evidence to be published to support the Plan. When the Plan is published for the statutory 6 weeks it will need to be accompanied by the evidence base. As agreed at the Steering Group work is being undertaken to this end. The Parish Council have now requested a screening opinion from the LPA as to whether a Strategic Environment Assessment is required. The housing site selection methodology and the results of this are being written up and will be published alongside the draft Neighbourhood Plan.”