

RESPONSE TO WYG / MILLER HOMES REPRESENTATION

This response focuses on the principles and procedural issues raised by WYG in their submission, rather than the detailed planning policies referred to in Appendix 1 of their document.

MEETING THE LEGAL REQUIREMENTS OF THE NEIGHBOURHOOD PLAN

Alignment with local policy.

The Parish Council (PC) notes the DMBC Draft Sites and Policies DPD was published for consultation in August 2013 at the same time as the Provisional Pre-Regulation Draft of the Armthorpe NP. The relationship between Neighbourhood Plans and Local Plans and the National Planning Policy Framework, is set out in paras. 1.9 to 1.12 in the DMBC Sites and Policies 2013 August, Publication Draft. In general terms, Neighbourhood Plans must conform with strategic policies within the LPA's Local Plan. Comparison of the Armthorpe Neighbourhood Plan (ANP) Pre-Regulation Draft and the DMBC Sites and Policies Draft DPD clearly reveals that the two documents are closely aligned in terms of the strategic issues of the amount and location of housing and employment development. Furthermore, the timescales of the two documents are sufficiently similar to enable a cohesion of the many other policies they contain. Having said that of course, the area of the ANP is but a fraction of the area covered by the DMBC Sites and Policies DPD; many site specific policies and proposals of the two documents, therefore, relate to completely different parts of Doncaster. It is in the very nature of localism that that should be so. Site specific policies especially relating to ANP area will, inevitably, not relate to the DPD Sites and Policies Area as it excludes the ANP area and vice versa.

Conformity with local policy:

The ANP must comply generally with the DMBC Local Development Framework Core Strategy and the DMBC Sites and Policies DPD and the other elements of the re-styled Doncaster Local Plan, because the Core Strategy and Sites and Policies DPD provide the context for neighbourhood plan work. (Again, please see the Draft Sites and Policies DPD / DMBC Core Strategy and the Pre Regulation Draft ANP). Armthorpe is identified in the Core Strategy as a principal town within Doncaster's settlement hierarchy and, as such, will accommodate a significant amount of the housing and employment development in Doncaster, as defined in the DMBC Core Strategy and Sites and Policies DPD. The Core Strategy allocates between 643 and 923 dwellings to Armthorpe and the Draft Sites and Policies DPD a mid-range number of 735 dwellings. The evidence for these allocations is drawn from the evidence base for the Doncaster Local Development Framework Adopted Core Strategy and the Draft Sites and Policies DPD.

Need for SEA

The need for an SA / SEA has not been established at the present time; DMBC has been asked for a screening opinion and the outcome is awaited in time for the six weeks pre-submission consultation on the ANP. A statement as to whether or not a SA / SEA was required will be included in the pre-submission Draft ANP.

Evidence base

The evidence base for the ANP policies and site allocations is that of DMBC's in preparing the Local Development Framework Core Strategy and associated documents. Thus, policy ANP 1 and the associated narrative and table 1 link back directly to the Local Development Framework Core Strategy Policies CS2: Growth and Regeneration Strategy and CS10: Housing Requirements, Land Supply and

Phasing. The ANP narrative goes on to show the link between the development requirements set out in ANP10 and ANP11 and the Local Development Framework policies relating to and addressing flood risk. SP16: meeting the housing requirement of the sites and policies draft DPD is also a key policy in allocating housing land in accordance with the SHLAA / SHMA residential land availability report. Table 1 identifies the sites and indicates the capacity and number of dwellings for each site including Armthorpe, which during the plan period is planned to deliver 785 dwellings.

Deliverability and Availability of Allocated Sites

The allocation of land for development, especially housing and employment, is a matter for the ANP and this is clearly set out on pages 4 and 5 of the DMBC Sites and Policies Draft DPD paras 1.9 to 1.12. However, the ANP does not have free reign to allocate land as it wishes because “due to the lack of brownfield sites, any allocations at Armthorpe will be on land identified in the Unitary Development Plan as Countryside Policy Area.” This means the quantum of both housing and employment development is defined by the DMBC Core Strategy and its location is circumscribed by the limits set out by the UDP / Local Development Framework Core Strategy. As for the criteria used to define more closely the sites proposed for housing and employment, these are set out under ANP 10 and ANP 11 both of which list the criteria used to select land at The Lings, Westmoor Link Road, Site 1 and land west of Hatfield Lane, Site 2. Key considerations are set out on page 15 and 16 of the ANP in relation to Site 1 where attention is drawn to the need to accommodate a green wedge north of the site.

On page 18 the ANP records the same key considerations in relation to Site 2.

There can be little doubt about the process and criteria used by the Parish Council to

define the major sites for development in accordance with the Local Development Framework Core Strategy and the Sites and Policies considerations.

Housing Site Selection

A critical element, then, of most development plans is identifying sites for housing. Because of the very close links between the DMBC Local Development Framework and the ANP, the techniques employed in site selection in the NP follow those used in the DMBC Local Development Framework. The methodology used in both plans is set out on pages 12 to 15 of the ANP Issues Report, January 2013. Armthorpe PC cannot, therefore, agree with the view of WYG that the policies and site allocations have been arrived at with limited transparency. The process is clear and the sites selected satisfy the criteria listed in both the ANP and the DMBC Sites and Policies Draft DPD. It is true that the outcome was not to select Grange Farm, but rather to propose both Site 1 and Site 2 East and West of Hatfield Lane. However, that is in the nature of site selection; not all sites considered are selected and it is the view of the Armthorpe PC that these major sites in particular, have been allocated following a rigorous process of site selection.

Interpretation of Green Wedge Policy

Green wedge policy is referred to at various points in the DMBC Local Development Framework Core Strategy, the DMBC Draft Sites and Policies DPD and, of course, the Pre Regulation Draft ANP. Review of the three documents reveal that the ANP follows closely the broad concepts promulgated in relation to green wedges and their various functions. The Grange Farm land is perceived by the PC as an important part of the green wedge separating Armthorpe from Edenthorpe. An inspection of the proposals map shows that quite clearly; residential parts of Edenthorpe are immediately north of the A630 and to the south is the farm land of Grange Farm and

the woodland beyond. North of the A630 and east and west of Hatfield Lane is open farmland. The draft ANP proposals retain a green area south of the A630 from the Sainsbury's Superstore to the proposed employment site west of Westmoor Lane. North of the A630 is an extensive tract of farmland running up to the A18 Thorne Road and beyond on the eastern side of Edenthorpe and Kirk Sandall.

APPENDIX 1

With the exception of the policies referring to green wedges in particular, the Appendix refers to detailed planning policies and how far the Grange Farm site could be said to comply with those policies. The PC feels that these detailed planning policies could be satisfied by appropriate development of any of the three major sites; however satisfying detailed planning policy does not support the view that Grange Farm should, therefore, substitute for either Sites 1 or 2 put forward in the pre-regulation draft of the ANP.

RESPONSE TO O & H PROPERTIES LTD.

The Steering Group welcomes the support of O & H for the allocation of land to the west of Hatfield Lane (S2).

ANP 2: With regard to O & H's comment on ANP2, their suggested alternative wording has been accepted by the Steering Group and will be recommended to the PC in preparing the pre-submission Draft ANP.

ANP5: The Steering Group accepts O & H's suggestion that reference to Code 4 for sustainable homes should be replaced with a wording relating to Doncaster MBC's Core Strategy Policies and current building regulations.

ANP 10 and 11: O & H's suggestion regarding an amendment to the 2 policies to allow for financial "contributions" as an alternative to developers providing education facilities on site, is accepted by the Steering Group.

ANP34: The Steering Group welcomes the commitment of O & H to the principle of a green wedge and accepts their suggestion about on going discussions with the PC about the green wedge.

APP3: The PC notes O & H's view that the level of detail shown on the plan for Site 2 is not normally necessary at this stage in plan preparation. However other planning authorities have included indicative layouts at this stage, sometimes as part of a planning brief. Indeed, the Steering Group has agreed on the basis of a representation made by O & H that the layout is merely illustrative and has indicated this in both ANP 10 and ANP11.

RESPONSE TO DELOITTE/CEMEX

The PC notes the comment that the CEMEX land be allocated for alternative development uses. However, the site is within flood zone 3 and liable to flooding whereas alternative sites are not. In addition, the alternatives are a better fit with the criteria set out in the DMBC Local Development Framework Core Strategy and the draft Sites and Policies DPD and other evidence based material.

RESPONSE TO IAIN GRIFFIN/MLA ON BEHALF OF PHILIP LODGE, OWNER AT NUTWELL SOUTH.

The PC notes MLA's consultation response dated 27 August 2013. Further information will be available during the formal consultation on the pre-submission draft of the ANP. The principal sites allocated for development, Sites 1 and 2, and

the Major Employment Site are clearly depicted within the Pre-Regulation Draft ANP. In addition the DMBC Local Development Framework Core Strategy and the Sites and Policies Draft DPD and the ANP Issues and Options Report contain an explanation as to how site selection has been approached for both employment and residential development.

The comment about the informal consultation on the Pre-Regulation ANP draft recognises that the consultation is over and above the statutory requirement but goes on to complain that August is not a good month for such an exercise. While that may be so, the Pre-Regulation consultation will be followed by the statutory six week consultation on the pre-submission draft of the ANP. Looking beyond the pre-submission draft stage to examination, the examiner is hardly likely to cavil with an extra period of consultation!

The comment regarding an environmental assessment of the proposed sites is being addressed by DMBC who have been asked for a scoping opinion about such an assessment.

The Village Master Plan is not a statutory document and there is no requirement to refer to it in the ANP. However, on page 6 of the ANP Issues Report, January 2013, it says “the planning of Armthorpe is not a new exercise and this report is based on the Unitary Development Plan, earlier community profiles and the Armthorpe Master Plan from June 2010.” MLA’s comments go on to refer to new highways as a means of addressing the traffic congestion in Armthorpe. While the Parish Council accepts there is a problem of traffic congestion in Armthorpe, there are a number of possible solutions, apart from new highways, and these should be addressed in TIA’s accompanying planning applications for residential and other development.

Regarding lack of consistency in the approach to the Draft Pre-Regulation ANP as opposed to responses to planning applications, it is a matter for the PC to come to a view about development proposals, always bearing in mind the need for conformity with the DMBC Local Development Framework Core Strategy and the draft Sites and Policies DPD. There is, of course, no requirement to conform to the Armthorpe Master Plan or any other non-statutory document.

Finally, the Parish Council cannot accept there is no published detail behind the draft NP; quite the reverse, there is a lot of detail, already published, bearing in mind the context and methodology provided by the DMBC Local Development Framework Core Strategy and the Draft Sites and Policies DPD.

RESPONSE TO McATEER ASSOCIATES/LAZARUS GROUP

The PC welcomes the support of the Lazarus Group regarding the level of development which the Pre-Regulation Draft ANP proposes in Armthorpe, bearing in mind, of course, that the scale of development is set in the DMBC Local Development Framework Core Strategy with which the ANP must comply.

The PC also welcomes the Lazarus Group's support for development to the north of Armthorpe and in particular south of Westmoor Link and east of Hatfield Lane for a mix of housing and employment. The PC notes Lazarus Group's concern that only B1 and B2 uses and not B8 are to be allowed on the Major Employment Site east of Hatfield Lane and south of Westmoor link. However, the PC wishes to promote B1 and B2 uses to encourage a more diverse economic base rather than further logistics and distribution firms, which are already prolific at the Westmoor Park site. Logistics and distribution businesses do not necessarily employ local labour and the jobs they do offer are often not well paid either.

The PC does not agree that ANP 34 is contrary to the DMBC Local Development Framework Core Strategy CS17. The PC feels that retaining a green area south of Westmoor Link and east of Hatfield Lane does contribute to the retention of a green wedge between Armthorpe and Edenthorpe.

Regarding the density of development on Site 2, the Lazarus Group argues that to accommodate 350 – 400 dwellings on their site would require very high density housing, indeed too high. The PC notes this point and will give further consideration to it.

The PC wishes to point out that the areas identified at Site 2 are indicative of the retention of green land as part of the green wedge between Armthorpe and Edenthorpe. The Council accepts that further analysis may be necessary before final boundaries are confirmed.

Regarding the Major Employment Site, Lazarus Group queries the apparent allocation of an existing local employment area as well as the undeveloped land. In response, however, the PC regards it as important to include the existing local employment area, as it is a mixture of developed, partially developed and undeveloped sites.

RESPONSES TO ANDREW ROLLINSON / RTTP HOLDINGS

The PC's response to the submissions made on behalf of RTTP Holdings , is as follows:

Traffic Congestion

RTTP Holdings attach much weight to the 2010 Armthorpe Master Plan. However, the Master Plan has no statutory significance and the PC is not required to take it

into account. Having said that, page 6 of the ANP Issues Report, January 2013, says “the planning of Armthorpe is not a new exercise and this report is based on the Unitary Development Plan, earlier community profiles and the Armthorpe Master Plan from June 2010”.

The PC accepts that there are problems of traffic congestion, especially at peak periods. These problems will be addressed in the TIA’s accompanying planning application, particularly in connection with Major Employment Site and Sites 1 and 2 The Links, West Moor Link Road and East of Hatfield Lane. The TIA’s will address a number of measures to ease existing congestion and increased traffic from the new developments. The measures will include traffic management / junction improvements / improved public transport / and increased cycling and walking provision. RTTP Holdings accept that two large housing allocations, The Lings, West Moor Link Road and off Hatfield Lane would have access to the M18 and Doncaster via the A630. However, they argue the failure to allow for a relief road to the south of Armthorpe means the plan does not address Armthorpe’s residents’ concerns.

The PC does not accept this argument; as already mentioned above, there are many different measures, which TIA’s could identify to address existing and future traffic congestion.

Regarding the Relief Road sketch, there is no necessity for further developments in addition to Barton Lane and the two Sites 1 and 2 and the Major Employment Site adjacent to the Westmoor Link.

The RTTP submission also says that because the Relief Road around the south of Armthorpe is not put forward in the APN Pre-Regulation Draft, the Draft is “not positively prepared and therefore not sound”. The PC cannot agree: the Pre-

Regulation Draft conforms to the DMBC Core Strategy and the Draft Sites and Policies DPD, both of which propose substantial tracts of housing and employment development. It is obvious the Pre Regulation ANP Draft is sound and this is confirmed by DMBC's Policy Manager on behalf of DMBC.

Housing Allocation

The RTTP Holdings' submission accepts that the DMBC Core Strategy puts forward the provision of between 643 and 925 homes in Armthorpe and this is in line with the NPPF.

The RTTP submission goes on to say because the ANP does not meet the highest figure of 923 there will be insufficient choice and competition in the market for land. The PC simply does not agree; the pit top development demonstrates that there is likely to be a strong market for housing development in Armthorpe.

Regarding windfall sites, there have been a number of them over the years not least the pit top development. While that scale of windfall development is not likely to be repeated, it will not be necessary to any large degree bearing in mind the availability of Sites 1 and 2 during the plan period.

RTTP maintain that the plan is unsound with regard to housing supply; this is simply not true as the ANP Draft conforms to the DMBC Core Strategy and Draft Sites and Policies DPD.

Barton Lane

RTTP Holdings criticises the policy ANP4 for identifying land at Barton Lane for housing because this proposal relies on relocating existing businesses to provide sufficient land to meet the higher housing target. For this reason RTTP consider the Draft ANP to be ineffective and therefore not sound.

In response, the PC would point out that the Planning and Compensation Act 2004 provides the compulsory purchase powers to enable land if necessary to be assembled for development subsequently. The PC cannot accept therefore, that the Draft ANP is rendered unsound because of the need for land assembly.