

**SECOND DRAFT NEIGHBOURHOOD PLAN CONSULTATION REPLIES AND ARMTHORPE PC RESPONSE**

<b><u>CONSULTEE</u></b>	<b><u>COUNCIL RESPONSE TO REPRESENTATION</u></b>	<b><u>ACTION</u></b>
<p><b>WYG ON BEHALF OF MILLER HOMES</b></p> <p>We write on behalf of Miller Homes regarding land at Grange Farm (SHLAA ref 431) in response to the Second Draft Armthorpe Neighbourhood Development Plan (ANP) which was released for consultation on 22<sup>nd</sup> August 2014.</p> <p>This response builds upon previous representations submitted to the draft (Pre-Regulation) Armthorpe Neighbourhood Plan in August 2013 and the draft Plan in January 2014.</p> <p>This letter contains an objection to the Neighbourhood Development Plan on the following grounds:</p> <ul style="list-style-type: none"> <li>• Unjustified Housing Numbers</li> <li>• Lack of Evidence Base</li> <li>• Site Selection Methodology and Scoring</li> <li>• Green Wedge Policy</li> <li>• Deliverability and Availability of Proposed Housing Sites</li> </ul> <p>It is important to reiterate that a hybrid planning application for up to 564 homes is still pending determination by Doncaster Metropolitan Borough Council for the Grange Farm site. The application was validated in September 2012 (planning application reference 12/02133/FULM) and has been on hold whilst the Neighbourhood Plan Process is underway. We consider that the Grange Farm site is available, in a suitable location for housing development, achievable and viable. Miller Homes remain committed to the early delivery of this site.</p> <p><b>Housing Numbers</b></p> <p>Policy CS2 within the adopted Doncaster Core Strategy identifies Armthorpe as a Principal Town within the settlement hierarchy, setting a housing allocation of between 643 and 923 housing units. Clear justification should be provided to</p>	<p>Please see Policy CS2 of the Doncaster Core Strategy for an explanation of the figures and how</p>	<p>No action is, therefore, required by the Parish</p>

<p>explain the chosen level of housing numbers promoted through the ANP. The draft proposal to allocate two sites to provide between 700 and 800 has not been tested or justified through the wider planning process. Table 1 in the ANP indicates that the 2 sites proposed for housing will deliver between 350-400 dwellings each. It is unclear as to how these figures have been derived and distributed.</p> <p>Paragraph 3.23 of the Core Strategy states that the Principal Town housing growth range will support market-led housing growth and service improvements provided a minimum requirement consistent with the lower end of the range is allocated to each town. The NPPF seeks to boost significantly the supply of housing and therefore the higher end of the indicative housing number should be met to ensure that the housing needs of the area are met.</p> <p>The Core Strategy recognises the importance of delivering allocations which are sustainable and as such seeks to allocate housing sites with priority being given to those well related to the main urban areas. The Grange Farm site is within the parish of Armthorpe which defines the geographical extent of the ANP. However it directly abuts the main urban area of Doncaster where the Core Strategy advocates that new housing should be focussed due to its ease of access to Doncaster and its services, the relationship to the highway network and to other infrastructure it performs well. As such this should be recognised in the site selection methodology and in the general text of the ANP, that this is a significant consideration in the assessment being made of the housing allocations. There appears to have been no recognition of this in the Draft Plan.</p> <p>The Doncaster Sites and Policies DPD was recommended for withdrawal by the Inspector in July 2014. The Inspector had specific concerns regarding the soundness of the Council's reliance on the Core Strategy housing requirement and concern that the evidence base which supports the Council's housing requirement is out-dated. A new Local Plan will now replace the draft Doncaster Sites and Policies DPD and the adopted Core Strategy. Work is already underway on a review of the Strategic Housing Market Assessment which will include an objectively assessed housing need and up to date evidence on the jobs and housing balance. Housing numbers for Doncaster are therefore likely to change which will have implications for the amount of new housing required in Armthorpe.</p>	<p>they have been derived and distributed within the Core Strategy. The ANDP has been declared by Doncaster MBC, as being in general conformity with the Doncaster Core Strategy, which remains an adopted Statutory Plan for Doncaster with a sound evidence base.</p> <p>While the Draft Sites and Policies DPD has been withdrawn by Doncaster MBC, that is not a sufficient reason, of itself, to delay the Armthorpe NDP. This is especially the case when the Armthorpe NDP can make a much needed contribution to satisfy housing and job requirements within the Doncaster area and in particular in Armthorpe. The Doncaster Core</p>	<p>Council.</p> <p>No action is therefore required by the Parish Council</p>
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<p><b>Lack of Evidence Base</b></p> <p>It is unclear how the policies and site allocations within the ANP have been arrived at with limited transparency over the evidence base which was used in the production of the ANP. There is no commentary within the document explaining why certain sites have not been promoted and there is a real danger that the plan may not be sufficiently robust. Comments from Jane Stimpson (DMBC Planning Policy Manager) in October 2013 stated that when the Plan is published for the statutory 6 weeks consultation it will need to be accompanied by an evidence base.</p> <p>The Planning Practice Guidance reiterates the need for proper evidence to underpin Neighbourhood Development Plans. It states <i>'proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan'</i>(paragraph 40).</p> <p>In response to the question <i>'How should the policies in a neighbourhood plan be drafted?' paragraph 41 states 'it should be concise, precise and supported by appropriate evidence'.</i></p> <p><b>Site Selection Methodology and Scoring</b></p> <p>The site selection methodology does not provide sufficient detail in terms of the scoring of the sites and the site selection methodology is not transparent. We do not agree with the scoring of the site at Grange Farm and we consider that there have been some serious errors in the scoring which has implications for the justification behind the two sites that have been selected for housing allocations.</p> <p>The grand totals for the site selection of the two selected sites; reference 474 West of Hatfield Lane is 70 and reference 422 East of Hatfield Lane is 67. Reference 431 Grange Farm scored 66, only 1 less than the proposed housing allocation 422.</p>	<p>Strategy remains an adopted Statutory Plan for Doncaster with a sound evidence base.</p> <p>The Site Selection Methodology explains how the sites were assessed for residential development purposes and the Parish Council then went on to choose the sites for allocation within the ANP. Of particular concern is the need to avoid coalescence of Armthorpe and Edenthorpe and this is clearly stated. The Parish Council therefore, does not accept that there is a lack of evidence about which sites were chosen and which were rejected.</p> <p>The Parish Council does not accept that the Site Selection Methodology fails to provide sufficient details in terms of the scoring, which is wholly transparent. The site selection exercise was undertaken on behalf of the community by the Parish Council, at an Extraordinary Meeting. The values attributed to site characteristics are those arrived at by the Parish Council debating</p>	<p>No action is therefore required by the Parish Council</p> <p>No action is therefore required by the Parish Council</p>
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There are particular concerns in relation to the Grange Farm site with respect to the following aspects of the site selection criteria:

- Important green space – Our objection to the site being classified as a Green Wedge is set out below.
- Public transport – We object to the Grange Farm site scoring '2' as it is within 400m of bus stops on Thorne Road where a wide range of bus services can be accessed such as 67, 69, 83, 85, 87, 88, 88A, 292. The site is also within 400m of bus stops along Elm Road/Mere Lane; therefore it is unclear why the site is rated '2' which is lower than site ref 474 and 422 which are over 800m from bus stops on Thorne Road where services in addition to 81 and 82 can be accessed.
- Key employment site – Whilst it is recognised that site ref 431 is over 800m from Westmoor Park, it is closer than site ref 474 and 422 to other areas of employment to the west, such as the retail development off Thorne Road, Wheatley Park Industrial Estate, Wheatley Retail Park and Kirk Sandall Industrial Estate. Site 431 is also much better located to access the full range of employment opportunities offered by the town centre. Therefore we consider it should be rated higher than '1'.
- Flood zone – The small part of the site which is in a flood risk zone has been excluded from the red line boundary for the planning application. Therefore the site should be scored higher, especially when considering that for site ref 474, the site selection form states 'part of the site known to flood and may affect building on it' and still scores '3'.
- Utility services available – It is not clear why site ref 431 scores '1' in respect of utility services available, whilst site ref 422 and 474 score higher when their utility services available are subject to local connections. There are no problems with utility connections for the Grange Farm site.
- Landowner willing to submit site for development – The Grange Farm site should have a higher score than '2' as a national housebuilder has submitted a planning application to develop the site for housing and therefore the site is available for development.
- Known legal or ownership constraints – The Grange Farm site should have a higher score than '2' as there are no legal or ownership constraints.

The main reason for choosing the two proposed housing sites (422 and 474) and discounting the Grange Farm site appears to be the assumption of coalescence of

the scores to be attached and agreeing values appropriate to each site and characteristic.

<p>Armthorpe and Edenthorpe if the Grange Farm site is developed. The justification for the decision to discount the Grange Farm site is stated as <i>'the critical factor regarding Grange Farm is the effect it will have in closing the gap between Armthorpe and Edenthorpe. There are other sites, eg. East and West of Hatfield Lane which do not suffer from this effect as the open vista to the North will remain. Development would have a harmful effect on landscape character. It is also next to a SSI and it may not be possible to resolve wildlife issues. Road access problems''</i>.</p> <p>We raise an objection to the assumption that the development will close the gap between Edenthorpe and Armthorpe. The scheme proposals submitted to Doncaster MBC have paid close regard to this matter and the scheme has incorporated an extensive green wedge buffer to the east of the site to avoid this. No justification is given in the ANP to the assumption that development would have a harmful effect on landscape character. No significant issues have been identified by WYG in relation to wildlife issues or road access and no justification is given in the Neighbourhood Plan to neither the wildlife issues nor the road access problems.</p> <p>In an earlier version of the Neighbourhood Plan (January 2014) it was stated that the two chosen housing sites were rated as 'extremely poor' compared to Grange Farm in relation to proximity to local services and that the two sites were 'isolated from the rest of the village'. No recognition or weight has been given to this key planning principle in the Second Draft Neighbourhood Plan.</p> <p><b>Green Wedge Policy</b></p> <p>It is identified in the Site Selection form that the Grange Farm site is an important green space. We disagree that the site is part of the Green Wedge as defined in the Doncaster Core Strategy or the now withdrawn Sites and Policies DPD. A suitable buffer can be achieved that maintains separation between Armthorpe and Edenthorpe that is supported by adopted policy CS17 'Map 9 – Indicative Green Wedge' and the detailed technical assessments produced on behalf of both DMBC and Miller Homes. This evidence demonstrates that it is not necessary for a green wedge to cover the entirety of the Grange Farm site. It has been confirmed by DMBC that it is not necessary to exclude the entire site from development. Paragraph 6.28 of the Core Strategy states that the identification of an area as being within the green wedge would not, in itself,</p>	<p>Accessibility to a range of services and facilities is certainly dealt with in the Site Selection Pro Forma in respect of each site. The argument between the Parish Council and developers whose land has not been allocated, centres around their different opinions about how easily accessible competing sites actually are.</p> <p>The Parish Council maintains that the Grange Farm site is part of the Green Wedge and the Countryside Policy Protection Area referred to in Policies CS3 Countryside and CS17 Providing Green Infrastructure. Both these Policies refer to the role of Green Wedges in protecting countryside where possible and appropriate. The Green Wedge and</p>	<p>No action is therefore required by the Parish Council</p>
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<p>exempt it from development. This understanding has been supported through the following technical evidence base documents:</p> <ul style="list-style-type: none"> <li>• DMBC - Landscape Appraisal (2007)</li> <li>• DMBC - Landscape Appraisal (update) (2010)</li> <li>• DMBC - Green Wedge Study (2012)</li> <li>• TPM Landscape – Landscape and Visual Impact Assessment (2012)</li> </ul> <p>As set out in previous responses to the draft Neighbourhood Plan, concern is expressed as to why the site is promoted as a green wedge at odds with the approach within the adopted DMBC Core Strategy policy and accompanying technical evidence base. This approach does not conform to paragraph 184 of the NPPF through which Neighbourhood Plans are required to be in general conformity with the strategic policies of the Local Planning Authority.</p> <p><b>Deliverability and Availability of Proposed Housing Sites</b></p> <p>Delivery potential is an important consideration in promoting allocations in order to be confident that the Council's housing land requirement can be met. Miller Homes is ready, willing and able to deliver a range of homes on the Grange Farm site to meet the local housing needs. The developers' planning application is detailed in part (265 units) and they have a desire to commence development of the scheme as soon as planning permission is granted. Other sites in Armthorpe are not under the same housebuilder control and there would be a significant delay before construction of the dwellings could commence. It would not appear that this has been given any weight in the site selection methodology.</p> <p><b>Conclusion</b></p> <p>To conclude, we object to the Second Draft Armthorpe Neighbourhood Plan for the reasons set out above and we consider that the site at Grange Farm should be included as a housing allocation.</p> <p>We believe that the Grange Farm site accords with all relevant policies in the Second Draft Armthorpe Neighbourhood Development Plan. The proposed</p>	<p>Countryside Policy Protection Area is also specifically referred to in the Draft Armthorpe NDP, preventing coalescence of Edenthorpe with Armthorpe and as such the NPPF is complied with in terms of sustainable development. No action is, therefore, required about Green Wedges, contrary to what WYG say.</p> <p>Grange Farm and the sites West and East of Hatfield Lane are considered by the Parish Council to be deliverable; that is not an issue. This is also confirmed by the most recent SHLAA and circumstances have not changed since. Furthermore, a planning application has already been submitted for one of the sites and the owner of the other allocated site is intending to submit a planning application in 2015.</p> <p>It is true to say that the Grange Farm site accords with most relevant policies in the Second Draft ANP. However, it does not address properly the issue of coalescence</p>	<p>No action is therefore required by the Parish Council</p> <p>No action is therefore required by the Parish Council</p>
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<p>development at Grange Farm is a sustainable gateway project and is the only site in Armthorpe which represents the opportunity to deliver multiple community benefits, increases connections between Doncaster and Armthorpe and develop a range of high quality, sustainable and functional homes. The homes would be built by a Home Builders Federation 5 star rated national housebuilder and would be achievable, available and ready for development now.</p> <p>We trust that you will take into account these comments to produce a sustainable and robust Neighbourhood Plan which will be able to stand up to scrutiny at the relevant stages of the Neighbourhood Planning process. We would welcome the opportunity to engage with you on these matters further.</p>	<p>between Armthorpe and Edenthorpe. Also, the Parish Council had choices to make and the development industry too. In this situation, differences of opinion about the suitability, accessibility and desirability of individual sites were bound to arise.</p>	
<p><b>MR. A. ROLLINSON FOR RTTP HOLDINGS</b></p> <p>This letter represents our comments on the Second Draft Armthorpe Neighbourhood Development Plan. They are made in accordance with the statutory consultation timetable set out by the Parish Council and follow our comments made to the original draft Plan made in March of this year.</p> <p>In a nutshell, we are still of the view that the process involved in the Neighbourhood Plan has been flawed and our criticism of this remains. If anything, our concern about the whole process has been deepened by this second draft.</p> <p>We fully realise that this criticism will be unwelcome but our view is that the second draft appears to be exactly the same in very many ways. The evidence base for the proposed allocations seems to have been 'retro fitted' to suit the originally proposed allocations of land for housing development. These proposed allocations include a site on which the Parish Council previously strongly objected to a</p>	<p>The second draft ANDP assesses the various option sites using a recognised methodology provided by URS, for use by Parish Councils / Neighbourhood Forum etc. The URS methodology is more sophisticated than the one used previously by the Parish Council</p>	<p>No action is required, therefore, by the Parish Council.</p>

<p>previous planning application. It is very difficult to see how such a 'volte face' can be reasonably justified and we are in no way satisfied that this Second Draft addresses this matter.</p> <p>There is still no reasoned justification as to why the Parish Council's previous 'demand' for a relief road has been abandoned and we are still of the view that the previous response on this point was utterly dismissive. The requirement for the delivery of a relief road is an 'inconvenient truth'.</p> <p>Our previous comments about proposed Policy ANP4 stand; reliance on compulsory purchase powers is not a sound basis to plan positively for the provision of sufficient new housing.</p> <p>On behalf of our clients (RTTP Holdings) we are obtaining ongoing legal advice and will take such advice when necessary once the Parish Council publishes its response to the comments received on this second draft of the Plan and when the plan moves forward to the Examination before an Inspector. We will be making both planning and legal representations at that time.</p> <p>Our firm view is still that the Plan will be found to be 'unsound' and believe that the future planning for Armthorpe will be best served by being returned to Doncaster MBC as part of its work towards a new Local Plan (now that its policies and sites Development Plan Document has been withdrawn).</p> <p>We await the response to our comments with great</p>	<p>and looks at more characteristics of the various sites and takes into account distances to facilities etc., which the methodology previously used by the Parish Council did not do in the same way.</p> <p>There were doubts from a number of residents that a relief road would not necessarily be effective enough in reducing congestion in Armthorpe Centre. In addition the Parish Council dismissed it as not being deliverable because of ownership issues.</p> <p>The use of Compulsory Purchase Orders was encouraged by the Planning and Compulsory Purchase Act and remains an important tool for land assembly. Barton Lane is a windfall site in mixed-use with both bad neighbour uses and existing residential development. It remains a site, which in terms of accessibility and proximity, is close to many facilities such as shops, bus services and a health centre. It is also the case that any houses that will be delivered at Barton Lane are over and above the allocations on the two main sites at Hatfield Lane. Furthermore, if Barton Lane were redeveloped for housing the bad</p>	<p>No action required by Armthorpe Parish Council.</p> <p>No action required by Armthorpe Parish Council.</p>
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<p>interest and will seek legal advice on them at the appropriate juncture.</p>	<p>neighbour uses would be removed and this would clearly be of advantage to the Armthorpe community. However, it is recognised that Barton Lane is in multiple ownership, which can often lead to delay while development packages are put together. No action is required, therefore by the Parish Council about Barton Lane.</p>	
<p><b>McATEER ASSOCIATES LTD.</b></p> <p>We write on behalf of our clients, the Lazarus Group, in respect of the above draft plan. As we have previously stated, on a number of occasions, my clients support the Parish Council in ensuring the correct level of development for the town is brought forward, that it is located in the correct location, and that it is deliverable in the life of the Plan. As major landowners in Armthorpe, they take their position seriously and would ask that the following comments be taken into account.</p> <p><b>Policy ANP1</b></p> <p>The Lazarus Group support the Parish Council's decision to allocate a range of housing between 700 and 800 dwellings during the period 2011 and 2028. Such an allocation is in accordance with the policies of the adopted Doncaster Core Strategy. The Lazarus Group control the land at Site 1 (The Lings, West Moor Link Road) and are confident that the site is capable of delivering the allocated number of houses in the plan period.</p> <p>However, Lazarus Group object to the need for a 'residential site brief when Policy ANP10 of the draft plan sites out criteria against which a planning application for housing would be assessed.</p>	<p><b>Policy ANP1</b></p> <p>The Parish Council welcomes the support from the Lazarus Group for the level of development and its location put forward in the ANP.</p> <p>The Parish Council notes Lazarus Group's objection to a residential site brief. However, the Parish Council feels that residential site briefs are standard practice when</p>	<p>No action is therefore necessary by the ANP regarding the level of development and its location.</p> <p>No action is, therefore, required by the Parish Council regarding residential site</p>

<p><b>Policy ANP2</b></p> <p>The Lazarus Group agree that new housing development should be well integrated with the existing built-up area and surrounding environment.</p> <p><b>Policy ANP3</b></p> <p>The Lazarus Group support the Parish Council's recognition that small unallocated sites can help meet the housing needs of Armthorpe provided they are not in conflict with other policies of the Plan. Such sites provide for the flexibility needed in meeting the housing needs of an area.</p> <p><b>Policy ANP4</b></p> <p>Whilst the Lazarus Group have no objection to the development of land at Barton Lane, the likelihood of it coming forward in the Plan period is remote and the policy could be regarded as unsound as it fails the test of deliverability required by national planning policy.</p>	<p>Neighbourhood and similar plans are being prepared.</p> <p><b>Policy ANP2</b> The Parish Council welcomes the support from the Lazarus Group for integrating housing development within the existing built up area and surrounding environment.</p> <p><b>Policy ANP3</b> The Parish Council welcomes the support from Lazarus Group for small unallocated sites helping towards meeting Armthorpe's housing needs.</p> <p><b>Policy ANP4</b> The Parish Council welcomes the support from Lazarus Group for development of land at Barton Lane, though the Group regard it as unlikely to happen. Although not in accordance with the Parish Council's wishes, who would prefer a comprehensive residential scheme, part of the site at Barton Lane is the subject of a planning application for residential development, which demonstrates that there is already interest in the site and suggests that it will be delivered within the Plan period. However, if planning permission were granted, the Parish Council</p>	<p>briefs.</p> <p><b>Policy ANP3</b> No action is, therefore, required by the Armthorpe Parish Council.</p> <p><b>Policy ANP4</b> No action is, therefore, required by the Parish Council.</p>
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<p><b>Policy ANP5</b></p> <p>The Lazarus Group agree that housing sites must be of a high quality and makes a positive contribution to achieving a successful place. However, they consider that the design criteria set out in the policy are overly prescriptive and would remove the opportunity for innovative design and layout.</p> <p>In particular, they object to the inclusion of Criterion N in respect of plot boundaries, and can see no planning reason for front boundaries to have 'robust boundary walls, fences, railings or hedges'.</p> <p><b>Policy ANP6</b></p> <p>The Lazarus Group consider the wording of the policy is imprecise, and that it is inappropriate to refer to the provision of 'new facilities.' Whilst they accept that new developments should not be over bearing on infrastructure, any requirement to upgrade infrastructure should be based on the impact of the particular development. The policy should make it clear that any such requirement placed on a development is to be based fairly on the impact of that development, as required by national planning policy and the CIL Regulations.</p> <p><b>Policy ANP9</b></p> <p>The Lazarus Group object to this policy as being unnecessary. Firstly the</p>	<p>recognise it would make a more comprehensive approach to Barton Lane less likely.</p> <p><b>Policy ANP5</b> The Parish Council welcomes the Lazarus Group support for high quality housing. However, the Group considers design criteria to be overly prescriptive especially criterion N. The Parish Council wishes to point out that ANP 5 is fully in line with the Doncaster Core Strategy Policy CS14 Design and Sustainable Construction. CS14 requires development to be of a high quality design and lists design principles and standards which will achieve this, including reference to boundary walls.</p> <p><b>Policy ANP6</b> The Parish Council notes Lazarus Group's concern that the policy is imprecise and anyway should not refer to new facilities. However, the new facilities could include shopping, leisure and other uses such as infrastructure in line with national planning policy and CIL regulations.</p> <p><b>Policy ANP9</b> The Parish Council notes Lazarus</p>	<p><b>Policy ANP5</b> No action is, therefore, required by the Parish Council</p> <p><b>Policy ANP6</b> The policy has been slightly amended to include shopping, etc.</p> <p><b>Policy ANP9</b> No action is, therefore, required</p>
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<p>criteria for the development of the two allocated sites contains no reference to phasing. Secondly, given the date at which the plan would become operable any reference to development being able to start in 2014 is superfluous.</p> <p><b>Policy ANP10</b></p> <p>The Lazarus Group support the allocation of their site referred to as The Lings for housing development and are confident it is capable of delivering between 350 and 400 dwellings in the plan period.</p> <p>However, they object to the overly prescriptive nature of the criteria set down to control the development of the site. In particular, they object to the following criteria for the reasons stated:</p> <p><b>2</b> The Lazarus Group accept that if the development of the site places pressure on the provision of school places, then, in accordance with national planning policy, it is appropriate for the development to ameliorate any pressure. However, the housing allocation is, using the Doncaster Council's standards, not sufficiently large to accommodate a school as well as delivering the necessary housing. This fact was stated as being the case at the Parish Council Extraordinary Meeting on 2 July 2014, and it was decided that a financial contribution would be required.</p> <p>It is submitted the reference to the provision of education facilities or contributions' should be amended to read 'education contributions.'</p> <p><b>4</b> The Lazarus Group consider the provisions of Policy ANP34 in its current form by reference to Appendix 2 the Green Wedge Plan, to be inconsistent with the Doncaster Core Strategy. The introduction of this criterion is similarly unacceptable and objection is made to its inclusion for the reasons stated in objection to Policy ANP34.</p>	<p>Group's objection to this policy because it is unnecessary. However, the Parish Council disagrees, as there is a reference to phasing and it is standard practice to have an indication as to when the development might start.</p> <p><b>Policy ANP 10</b></p> <p>The Parish Council welcomes Lazarus Group's support for the allocation of the Lings.</p> <p><b>2.</b> The Parish Council agrees that developer contributions can be in the form of new facilities or a financial contribution.</p> <p><b>4.</b> The Parish Council believes that Policy ANP34 (re-numbered ANP 35) is consistent with the Doncaster Core Strategy; see in particular para. 6.2.8 of the Core Strategy and</p>	<p>by the Parish Council</p> <p><b>Policy ANP 10</b> No action is, therefore, required by the Parish Council</p> <p><b>2. The Parish Council will amend the reference to education facilities by including 'education contributions' as well as new buildings.</b></p> <p><b>4. No action is required by the Parish Council, except re-numbering ANP 34 to ANP 35.</b></p>
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<p>7 The Lazarus Group consider this criteria is based on an unsubstantiated assessment of the site. The Secretary of State accepted the site represents an appropriate urban extension in line with the Doncaster Core Strategy. Neither the Secretary of State or his Inspector found it to be in a rural setting. In describing the site, the Inspector's only reference to features and vegetation is found at paragraph 12 of his report where he refers to the fact the land rises gently from the north-east to the south-west, and that "...There are several mature trees on the eastern part of the site and hedgerows of varying height and extent on the frontages of Hatfield Lane and West Moor Link." Furthermore the Inspector at paragraph 115 of his report stated " the development as a whole would relate well to the existing urban form, given the spread of the built up area on two sides of the site.... Development would extend up to the A630, which marks the limit of the built-up area to the southeast, and which is a distinct physical feature close to Armthorpe. For these reasons I consider the appeal proposals would represent a natural extension of the settlement, and it would not fundamentally alter the pattern of built development</p>	<p>Map 9 Green Wedges, where the inter-relationship between Green Wedges and Countryside Protection Policy Areas, is set out. Regarding the Inspector's Decision on The Lings appeal, the Parish Council now accepts both the Inspector's and the Secretary of State's decisions that The Lings would generally be suitable for development, although doing so clearly represents an urban extension. This is why The Lings is now allocated by the ANP for residential and associated uses and also employment uses in the north- eastern corner of The Lings.</p>	
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<p>and open land in the locality." As a result, we cannot agree with the statement in Criterion 7 that the site is "essentially within a rural setting with local natural features and vegetation," or that the landscaping would identify this as a fact.</p> <p>It is submitted that this criterion is inappropriate and should be removed from the policy, especially as there is now a planning permission for employment uses on land immediately to the north-east of the proposed residential allocation.</p> <p>The Lazarus Group object to the form of the 'Key Considerations' and for the reasons stated above consider they should not refer to the site as being part of a rural setting, nor should there be reference to the need to comply with the provision of a Green Wedge between the employment and housing allocations.</p> <p>The Lazarus Group also object to the 'Key Considerations' requiring a landscaped area of linear open space running east-west along the southern boundary of the site. The impact of the development of the site for housing on properties along Mercel Avenue was fully considered by both the Secretary of State and his Inspector. However, whilst the Secretary of State was content that "tree planting... to the north of the existing dwellings on Mercel Avenue" was all that was required, the Parish Council now appear to be seeking a landscape strip in excess of what was considered necessary by the Secretary of State. The Lazarus Group have previously made objection to this requirement and whilst the policy itself has been amended appropriately it is considered its justification should recognise this change.</p> <p><b>Policy ANP12</b></p> <p>The Lazarus Group support the allocation of the land south of West Moor Link as a Major Employment Site (Site 3).</p>	<p><b>Policy ANP12</b></p> <p>The Parish Council welcomes the support of the Lazarus Group for the allocation of land south of the West Moor Link as a Major Employment Site.</p>	<p><b>Policy ANP12</b></p> <p>No action is therefore required by the Parish Council</p>
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<p>The Proposals Map should recognise the site has planning permission as with other such sites.</p>	<p>Regarding the Proposals Map, the Major Employment Site, according to the Lazarus Group should be recognised as having planning permission. This is not necessary as the site is allocated as a Major Employment Site along with the other two sites. Whether or not planning permission has been granted for any of these sites is not strictly necessary to the Draft Plan. Instead it is deemed appropriate to show all the allocated Major Employment Sites in one colour, i.e. purple.</p>	<p>The Parish Council will amend the Proposals Map by showing all the allocated Major Employment Sites in one colour (purple).</p>
<p>However, they object to the exclusion of Class B8 Distribution Warehousing from the site. It is respectfully submitted that the Secretary of State has recognised that the delivery of other sites in the Parish and Borough would not meet the needs of the market, and that this site was entirely acceptable for such uses. There can be no planning reason for Class B8 being excluded from this site. (The site is ideally located close to the strategic highway network.) Furthermore, the site has the benefit of an outline planning permission which allows Class B8 uses. It is therefore nonsensical for the Neighbourhood Plan to exclude such uses in this policy.</p>	<p>The Parish Council would still prefer to restrict additional B8 warehousing of which there seems an adequate supply. However, as the site now has the benefit of Outline Planning Permission which allows B8 uses, the Parish Council has no alternative but to withdraw its objection to B8 warehousing</p>	<p>The PC agrees therefore, to include B8 warehousing as an acceptable use on the major employment sites and has amended Policy ANP12 accordingly.</p>
<p><b>Policy ANP19</b></p> <p>The Lazarus Group recognise that developer contributions may be necessary to mitigate the impacts of development. However, such contributions must be justified and in accordance with relevant CIL Regulation or advice on S.106 Obligations. They therefore object to the inclusion of points C and D in the policy. Neither has been justified nor are they sufficiently clear in their intent. Such an approach is contrary to national planning policy.</p>	<p><b>Policy ANP19 (re-numbered ANP 21)</b> The Parish Council's approach is that developers should comply with CIL regulations and S106 obligations. Points C and D in ANP 19 are an elaboration of the fundamental approach set out in the first sentence of ANP 19. The</p>	<p><b>Policy ANP 19</b> No action is therefore required by the Parish Council, except re-numbering ANP 19 to ANP 21.</p>

<p><b>Policy ANP22</b></p> <p>The Lazarus Group support the Council in seeking to encourage small retail units in the allocated housing sites. However, it should be made clear that it should be the market that decides the appropriateness of such units, and that the inclusion of such units should not be a prerequisite of any housing layout. The Lazarus Group also object to the Plan placing a limit on the size of any retail unit. They consider the size should be the result of the market and a retail impact assessment. Such a low limit would prevent any form of convenience store coming forward, as even a Spar or similar store require a minimum floor area of 250 sqm.</p> <p><b>Policy ANP26</b></p> <p>The Lazarus Group recognise that new development should be required to contribute to the provision of educational infrastructure where necessary as a result of development. However, they object to the wording of the policy in respect of the provision of new development and facilities. Neither housing allocation is large enough to justify the requirement for a new school when based on the Borough Council's standards.</p> <p>The first and last bullet points of the policy should be removed.</p> <p><b>Policy ANP27</b></p> <p>The Lazarus Group object to the need to identify land on the allocated housing sites for a school. Neither site is capable of accommodating a school and delivering the necessary housing. Furthermore, the policy has no justification</p>	<p>Parish Council therefore, wishes to retain points C and D In the Policy.</p> <p><b>Policy ANP 22 (re-numbered ANP 24)</b> The Parish Council notes Lazarus Group's view but still wishes to indicate the Council's support for small retail units. The 100 square metre site is illustrative and is intended to be so. A market and Retail Impact Assessment would be expected as part of a planning application.</p> <p><b>Policy ANP 26 (re-numbered ANP 28)</b> The Parish Council welcomes Lazarus Group's support for developer contributions to education infrastructure if new development requires it. The LEA has confirmed that there is existing pressure on primary schools that will need addressing either by a new or extended school. The precise location has not been chosen and further discussions with developers may be required. Consequently, the Parish Council will not agree to delete the first and last bullet points.</p> <p><b>Policy ANP 27</b> Lazarus Group's objection to identifying land on the allocated housing sites is noted and the Parish Council agrees that this</p>	<p><b>Policy ANP 22 (re-numbered to ANP 24)</b> No action required as ANP 22 24 is considered by the Parish Council to be indicative of the best approach to small retail units.</p> <p><b>Policy ANP 26 (re-numbered to ANP 28)</b> will, however, be amended to include the old ANP 27 (which will be deleted) as an option for discussion.</p> <p><b>Old Policy ANP 27</b> will be deleted but the Policy text will be retained as an option</p>
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<p>for such provision.</p> <p>It is respectfully submitted that this policy should be deleted.</p> <p><b>Policy ANP34</b></p> <p>Whilst the Lazarus Group support the principle of Green Wedges, they remain concerned that the extent of the Green Wedge shown on the Proposals Map (Appendix 2) is contrary to Core Strategy Policy CS17. The Core Strategy makes it clear that Green Wedges are to be used to protect strategic rural gaps between settlements. The Core Strategy identifies the gap in this part of the Borough as between Armthorpe and Edenthorpe. It is respectfully submitted that the introduction of a Green Wedge south of West Moor Link does not fulfil this objective, a fact which was recognised by the Inspector at paragraph 112 of his report where he stated: "Significantly it (the site) does not form part of the green wedge in the strategic gap between Armthorpe and Edenthorpe." Furthermore, the Lazarus Group consider the land between the housing and employment allocations plays no purpose in maintaining this gap and should be removed. The Lazarus Group accept that a landscape buffer is necessary on the northern edge of the housing allocation, but do not accept that it can or should be regarded as a Green Wedge.</p> <p>The Proposals Map (Appendix 2) should be amended accordingly.</p> <p><b>Policy ANP35</b></p> <p>The Lazarus Group consider the wording of this policy to be contradictory and confusing. By definition new development will impact on openness. They cannot see that the policy is anyway necessary as other policies of the plan require landscaping to be provided to soften the impact of new development.</p> <p>In addition to their objections to the Written Statement of the draft Plan, and their objection to Appendix 2, the Green Wedge Plan, the Lazarus Group wish to object to both the Proposals Map and the Site Selection Scoring Form for the housing allocation at The Lings</p>	<p>policy can be deleted but its provision incorporated in Policy ANP26 as an option.</p> <p><b>Policy ANP34 (re-numbered ANP 35)</b></p> <p>The Parish Council notes Lazarus Group's comments but will retain the Green Wedge to the north of the allocated residential site. The Parish Council still wishes to have a buffer between the edge of both the housing allocation and the Major Employment Site. Such a buffer, the Parish Council believes would also constitute a Green Wedge at this point in Armthorpe.</p> <p><b>Policy ANP 35 (re-numbered ANP 36)</b></p> <p>The Parish Council accepts that new development will impact on openness, as did the Appeal Inspector. However, that impact should still be minimised by a sensitive approach to landscaping.</p>	<p>for discussion under the new ANP 28.</p> <p><b>Policy ANP 34-(re-numbered to ANP 35)</b></p> <p>No action is, therefore, required by the Parish Council.</p> <p><b>Policy ANP 35-(re-numbered to ANP 36)</b></p> <p>No action is, therefore, required by the Parish Council at this stage.</p>
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<p>In respect of the Proposals Map, the annotation for the land for employment development, south of West Moor Link should be coloured brown to reflect the fact it is has planning permission and is not in fact just an allocation. This would be consistent with the approach to the land referred to as Site 1 West Moor Park Extension.</p> <p>In respect of the Site Selection Scoring, the Lazarus Group consider the Parish Council are inconsistent with the scores attributed to the housing allocation at The Lings. In this respect, it is considered that the attached comments better reflect the relative merits of the site, and clearly demonstrates the appropriateness of the housing allocation. Based on these comments the site should be given a further 8 points giving a total of 75 points.</p> <p>The Lazarus Group hope that their response will be fully taken into account by the Parish Council, and, as ever, would be pleased to discuss their response if it is considered appropriate. They would also register their intention to attend any public debate into the policies of the Neighbourhood Plan.</p> <p><b>Important Green Space</b> It is unclear what point is trying to be made on this criteria. Armthorpe's comments state that there are a number of green spaces within 800m. As this is an Environmental Consideration, we would have thought that this should be seen as a positive. Even if it is seen as a negative, to be consistent with the rest of the site scoring, to be "within 800m" should score 2 points. Depending on if you are considering the matter as a positive or a negative, less than 400m would either score a 1 or a 3 and it would be vice-versa for over 800m. Therefore, surely "within 800m" should fall in to the 400-800m distance that scores a 2 in all the other assessments. <b>Therefore score should be 2 not 1.</b></p> <p><b>Sites Designated as being of local importance</b> The nature reserve at Ikea is in excess of 400m from the proposed residential site, although its location within the Ikea site is not marked on the OS or visible on</p>	<p>This point has been addressed in the response to ANP 12 above.</p> <p>Regarding the Site Selection scoring, this was the subject of an Extraordinary Meeting of the Parish Council. The Parish Council firmly believes The Lings score confirms its allocation for housing. The adjustment suggested by the Lazarus Group would not, in any event, materially alter the ranking of the sites, which was derived from the scores agreed by the Parish Council acting on behalf of the Armthorpe Community.</p>	<p><b>The Parish Council agrees to amend the Proposals Map relating to the Major Employment Sites – see response to ANP 12 above.</b></p> <p>No action is, therefore, required by the Parish Council.</p>
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Google Earth. In addition, we must request details of the "2 local wildlife sites stated as being within 300m". The only sites that they could possibly be are both on the opposite side of West Moor Link which would provide an effective barrier. **Therefore score remains as 1.**

**Town/Local Centre/Shop** Measuring on the OS the distance from the site to the shopping centre on Mill Lane in Armthorpe village centre, the site is actually closer than site 474 West of Hatfield Lane. However, site 474 has scored 2 points as against the 1 awarded to our site. To be consistent, the site should score at least the same as site 474. **Therefore score should be 2 and not 1.**

**Cycle Route** The Armthorpe to Doncaster cycleway runs along West Moor Link and less than 400m from the site. The footpath that the cycleway is on actually continues up to and past the site. It is only the official route that heads off into Edenthorpe rather than continuing along West Moor Link. **Therefore, score should be 3 not 2.**

**Tree Preservation Orders** We cannot understand the scoring consistency. There are three categories in None, One and More than One. The site has none and this is confirmed in the comments section. It would therefore be expected, as with site 596 which also has none, that the site would be awarded the maximum 3 points. However, only 2 have been awarded. **Therefore, score should be 3 and not 2.**

**Ecological Value** The assessment confirms that the site is not affected by ecological value. The comments state "the interior of the site should be assessed". Only 1 point has been awarded, whilst other sites have been awarded 2 points. An Ecological Appraisal of the site was undertaken in May 2010 by Louise Hill of MRB Ecology and Environment. The assessment recorded limited impact on local biodiversity due to the loss of open farmland and suggested mitigation measures that offset the limited impact. This has been accepted by DMBC and the Planning Inspector and Secretary of State following the planning application and subsequent planning appeal. **Therefore, score should be 2 and not 1.**

<p><b>Significant Infrastructure Crossing Site</b> The assessment suggests 16Kv and 175Kv cables cross the site. The 175Kv cables do not cross the proposed residential allocation, they run along and within the boundary of the recently approved employment application on the eastern side of the site. The 16Kv cables do cross the proposed residential allocation but are subject to a "lift and shift" clause should the site come forward for development. <b>Therefore, score should be 2 and not 1.</b></p> <p><b>Views In?</b> During the previous planning appeal on the proposals, the inspector considered views in and out of the proposed site. He found, at para 117 of the appeal decision that "Due to the relatively flat nature of this area of countryside, the site is not particularly prominent in the wider landscape ..... From the open land to the north, public vantage points are limited, and existing hedgerows and trees would restrict the extent of views..... I do not consider that the composition of these views would be materially altered". At para 118, the inspector concluded "that the proposed development would not have a damaging effect on the character and appearance of the area". <b>Therefore, score should be 2 and not 1.</b></p> <p><b>Views Out?</b> During the previous planning appeal on the proposals, the inspector considered views in and out of the proposed site. He found, at para 117 of the appeal decision that "Due to the relatively flat nature of this area of countryside, the site is not particularly prominent in the wider landscape..... From the open land to the north, public vantage points are limited, and existing hedgerows and trees would restrict the extent of views..... I do not consider that the composition of these views would be materially altered". At para 118, the inspector concluded "that the proposed development would not have a damaging effect on the character and appearance of the area". <b>Therefore, score should be 2 and not 1.</b></p>		
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<p><b>MR. I. GRIFFIN OF MLA FOR MR. P. LODGE</b></p> <p><b>In response to the updated Draft Neighbourhood Plan we would like to make the following comments on behalf of the landowner of Sites 513 and 514</b></p> <p>Please see below a summary of comments in relation to the Second Draft Neighbourhood Plan:</p> <p><b>Methodology</b></p> <p>We again criticise the site selection methodology used. The proforma is a one size fits all approach, and does not take into account specific concerns for the village to reflect the Issues Report from January 2013. If the scoring and methodology is not going to reflect issues identified, what was the point of this document? The URS proforma is largely an accessibility matrix for sites, not an assessment of proposals. As a result there was little or no assessment of any of the information provided for the above sites nor any others (masterplans and technical reports - a number which were prepared at the request of the Parish Council).</p> <p>The document goes on to state that the results of the scoring assessment were that "the sites chosen were the same as those allocated in the First Draft Plan, which vindicated the original site selection methodology undertaken by the Parish Council and dispels the criticisms received in this regard". This is incorrect. Had the correct inputs been used at the initial scoring exercise, this would</p>	<p>The Parish Council notes the comments of Iain Griffin on behalf of MLA</p> <p>Regarding Methodology, the Pro Forma URS approach is intended to be a consistent assessment of the suitability of alternative sites for development, not an assessment of proposals themselves. The Parish Council firmly believes the URS Pro Forma approach is consistent and fair and has been applied across all the sites identified earlier by DMBC. The inputs used to evaluate the alternative sites were subject to internal checking by DMBC. While scores assigned by the Parish Council are inevitably subjective, they do represent the community's views expressed on their behalf by the Parish Council.</p> <p>MLA's conclusion that the URS Pro Forma Methodology and the one used by the Parish Council originally, produced the same outcomes in terms of preferred sites because of "errors in scoring etc." is</p>	<p>No action to be taken by the Parish Council at this stage.</p> <p>No action to be taken by the Parish Council at this stage</p> <p>No action is, therefore, required by the Parish Council.</p>
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have found in our view that Site 514 was in fact in the top two sites largely because there were no significant objections to the proposals, nor did the flood risk issue exist.

incorrect in the Parish Council's opinion. The overall suitability of The Lings, for development, was also the conclusion by the Appeal Inspector and Secretary of State, both of whom looked at the merits/demerits of The Lings site. This opinion of the Inspector/ Secretary of State that The Lings was a very suitable site was tested by reference to compliance with the Doncaster UDP/Core Strategy/ NPPF and the now withdrawn, Draft Sites and Policy DPD. Mr. Griffin commented on his quote about site suitability for urban extension and much needed housing, saying it was subjective and personal. However, this comment disregards the fact that many planning judgements are, in the final analysis, subjective. Indeed, these comments are entirely consistent with the Secretary of State / Inspector's conclusion about The Lings which are also subjective! The Lings is, of course, directly adjacent to the land west of Hatfield Lane (which separates the two sites) and the two sites together are regarded favourably, after a thorough analysis of the issues.

<p><b>Scoring</b></p> <p>Notwithstanding this, we have criticisms regarding the input for the scoring used as part of the current draft Neighbourhood Plan. There are references to cycle paths, with sites 513 and 514 identified as not being close to a cycle way despite one running down the site of Nutwell Lane, which the land owner gifted to the public a number of years ago.</p> <p>There are numerous other factual inaccuracies in the scoring, most of which have been pointed out previously. The land being grade 3 agricultural land, is therefore not high quality as described. Other sites, which attract the same classification of agricultural land are simply referred to as agricultural land. Bizarre comments remain in the scoring sheets, including subjective and personal comments such as sites 474 and 422 "being a good site for urban extension...and will provide much needed houses". There is also reference to 175kv power lines on site 422 with no further comment, whereas the same power lines on site 514 are referenced and considered obtrusive and would need to be designed around. These were of course factored in as part of the masterplanning exercise for sites 513 and 514. The above suggests that the scoring exercise has not been undertaken objectively, and cannot be relied on. These are just some examples and we have not sought to provide, and others exist.</p>	<p>Scoring: The Parish Council has based its assessment on formal cycle ways rather than informal ones. It is now accepted that Mr. Lodge donated land for a cycle way. Despite this, the empirical scores were not the only considerations as the Site Selection Methodology on page 3 clearly says; with only 9 points separating the highest and lowest scores, the Parish Council considered in further detail 1. Suitability, 3. Availability and 4. Summary. The Parish Council regards the single factor of the impact on urban form as a show-stopper, in that it is so significant as to outweigh other factors. Reference to the Inspectors/Secretary of State's decision at The Lings Inquiry confirms the view that visual impact can be a serious consideration in determining whether land should be developed or not. The Parish Council regards development of the land to the south of Armthorpe as much more intrusive in its impact on the urban form of Armthorpe, in that it would relate poorly to the rest of Armthorpe. Developing sites 513 and 514 East and West of Nutwell Lane, would also conflict with the Green Wedge and Countryside</p>	<p>Doncaster Council has confirmed that there is a formal cycleway on Nutwell Lane.</p> <p>No action to be taken by the Parish Council.</p>
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<p><b>Green Wedge</b></p> <p>The current proposed green wedge to the south of the settlement has never previously been mentioned. The fact this follows land ownership boundaries over private land, rather than a specific wedge designed to prevent settlement coalescence (it is presumed) suggests it has been prepared to undermine the promotion of land to the south. Where is the evidence base that supports the inclusion of a green wedge in land containing agricultural buildings and a water treatment works, or the design of this green wedge? It would be expected that this evidence base would include information which explains why the green wedge proposed to the south is far greater than the proposed wedge to the north, given the current southern boundary of Armthorpe is 1 mile from Old Cantley, whereas the northern boundary is less than half a mile from Edenthorpe?</p>	<p>Protection Policy Area south of Armthorpe. The reference to grade 3 agricultural land as high quality is correct, although Grades 1 and 2 are of the highest quality.</p> <p>Development would have to be designed around any 16KV power lines on site 422 west of Hatfield Lane or elsewhere, as they would have to do for sites 513 and 514 that have large pylons, higher energy loadings and bigger offsets.</p> <p>The planning application for The Lings site (474) has already taken account of the overhead power lines, which shows the land below the lines as public open space.</p> <p>Green Wedge:</p> <p>The Parish Council refutes the suggestion that the Green Wedge to the south “has been prepared to undermine the promotion of land to the south.” In fact, the Green Wedges on the northern and southern edges of Armthorpe reflect para. 6.2.8 and Map 9 Green Wedges, of the Adopted Doncaster Core Strategy.</p>	
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<p><b>Next Steps</b></p> <p>On behalf of my client we are obtaining ongoing legal advice and will take such advice when necessary once the Parish Council publishes its response to the comments received on this second draft of the Plan and when the plan moves forward to the Examination before an Inspector. We will be making both planning and legal representations at that time.</p>	<p>Next Steps.</p> <p>The Parish Council notes that Mr. Griffin's clients are obtaining legal advice in making planning and legal representations to the examination before an independent examiner appointed by Doncaster Council, in its capacity as the local planning authority.</p>	
<p><b>DAVID LOCK ASSOCIATES</b></p> <p>On behalf of our client O&amp;H Properties Ltd (O&amp;H) we are pleased to provide a response to Armthorpe Parish Council's consultation on the <i>Second Draft Armthorpe Neighbourhood Development Plan</i> (August 2014).</p> <p><b><u>Background to the representations</u></b></p> <p>O&amp;H are the freehold owners of the 'Land West of Hatfield Lane' and in recognition of the importance of this site to the strategic growth of the village, O&amp;H have contributed towards and played an active role in assisting the Parish Council with the preparation of the Armthorpe Neighbourhood Development Plan. O&amp;H are keen to continue to work in partnership with the Parish Council to bring the Neighbourhood Plan to independent examination and adoption.</p> <p><b><u>Consultation on Draft Armthorpe Parish Council Neighbourhood Development Plan (January 2014)</u></b></p> <p>In response to the Parish Council's consultation on the <i>Draft Armthorpe Parish Council Neighbourhood Development Plan</i> in March 2014, O&amp;H provided a series of comments and recommendations. O&amp;H welcomes the efforts made by the Parish Council to consider and respond to some of the recommendations outlined within these representations.</p> <p>O&amp;H are particularly grateful for the efforts made by the Parish Council to rectify the discrepancies that had been identified in relation to the plan shown at the</p>		

<p>now superseded 'Appendix 3'. O&amp;H have worked with the Parish Council to ensure that 'Appendix 1 to the Second Draft Plan – Armthorpe Proposals Map' and any other plans relating to Land to the West of Hatfield Lane are accurate and consistent.</p> <p><b><u>Second Draft Armthorpe Neighbourhood Plan - Vision and Aims - SUPPORT</u></b></p> <p>We endorse the shared vision and aims of the local community outlined within the plan. O&amp;H have the same vision for sustainable growth and consider that the Neighbourhood Plan reflects the most appropriate growth strategy for Armthorpe. In particular O&amp;H welcome the opportunity to work with the Parish Council and the local community to deliver this shared vision and aims through the development of Land to the West of Hatfield Lane.</p> <p><b><u>Land to the West of Hatfield Lane - UPDATE</u></b></p> <p>O&amp;H strongly supports the identification of 'Land West of Hatfield Lane' as a location for sustainable growth on the <i>Armthorpe Parish Neighbourhood Plan Proposals Map</i> and within Policies ANP1 and ANP11.</p> <p><i>Sustainability Appraisal and Site Assessment</i></p> <p>For the second draft Neighbourhood Plan, O&amp;H note that a Sustainability Appraisal has been undertaken to assess the Neighbourhood Plan to comply with European Strategic Environmental Regulations. The site selection methodology has also been refined to address concerns raised at the previous stage of consultation. We consider that these advancements provide a robust evidence base to support the draft Plan and are wholly proportionate to and appropriate for a neighbourhood plan.</p> <p>Having reviewed the Sustainability Appraisal (SA) and the Site Selection information we consider that they generally provide an accurate reflection of the known environment of 'Land West of Hatfield Lane'. Furthermore, they accurately demonstrate that this site is suitable for accommodating the scale of development required for Armthorpe and substantiates that it will contribute to the most</p>	<p>The Parish Council welcomes the support for the shared vision and aims of the community outlined within the Neighbourhood Plan. Also, that O &amp; H consider the Neighbourhood Plan reflects the most appropriate growth strategy for Armthorpe.</p> <p>The Parish Council also welcomes the support from O&amp;H for the identification of land west of Hatfield Lane as a location for sustainable growth on the Neighbourhood Plan Proposals Map and within Policies ANP1 and ANP11.</p> <p>O&amp;H regard the Sustainability Appraisal and the Site Selection Methodology as providing a robust evidence base proportionate to and appropriate for a Neighbourhood Plan. The Parish Council welcomes this support from O&amp;H.</p>	<p>No action to be taken by the Parish Council.</p> <p>No action to be taken by the Parish Council</p> <p>No action to be taken by the Parish Council.</p>
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appropriate growth strategy when considered against other alternatives. The *Site Assessment and Selection Methodology* provides a summary of the findings of the site assessment process for each of the sites assessed including 'Land West of Hatfield Lane'. The summary in relation to 'Land West of Hatfield Lane' confirms that the site has good access to public transport, greenspace and existing employment uses and the motorway network.

O&H welcomes the Parish Council's initiative to undertake the SA and assessment of sites within the neighbourhood area and agree that this work supports the policies defined within the plan. As noted above whilst we consider they provide a generally accurate assessment, O&H would like to take this opportunity to provide some further detail and clarifications to ensure that the evidence base supporting 'Land West of Hatfield Lane' is robust.

The table in Appendix 1 provides additional information in relation to the various site assessment criteria, where relevant, that we hope will assist in supporting and substantiating the allocation of this site, particularly when assessed against any alternative sites. Work to establish an accurate environmental baseline is ongoing and this table reflects the latest position.

It is important to note that whilst the site assessment proforma indicates that the site has the capacity of up to 925 dwellings, the proposed allocation ANP11 for 350 – 400 represents a more appropriate capacity for the site taking into account the requirement to provide a Green Wedge (in accordance with draft Policy ANP34) and the incorporation of suitable residential densities to complement existing and planned neighbouring residential areas.

The assessment undertaken (by URS) as part of the neighbourhood plan process is therefore considered to provide a worst case, and therefore robust, examination of the site. However, it is important to recognise the design work undertaken by O&H and their own technical evidence base which supports the emerging proposals, is based on a capacity more akin to the allocation numbers (350 – 400 units). It is this initial design work and O&H's technical evidence base which is used to inform the details and clarifications set out in Appendix 1 of these representations.

*Other Key Considerations: Flood Risk - OBJECT*

The Site Assessment also suggests that the site may be prone to flooding and that a detailed flood risk assessment would be required to determine the necessary measures to offset or mitigate the risk of flooding. **O&H object to**

O&H note that the Site Assessment Pro Forma indicates that the site has a capacity of up to 925 dwellings as opposed to the proposed allocation for 350 – 400 dwellings. This is a more appropriate capacity for the site allowing for the requirement to provide a Green Wedge in accordance with draft Policy ANP34 (re-numbered ANP 35). The lower figure for the proposed allocation also allows more suitable residential densities consistent with existing and planned residential areas.

Flood Risk:

Although there is no official record of flooding on the site, the Parish

Flood Risk

No action to be taken by the Parish

**this statement which does not reflect the content of the completed site selection form, or the Environment Agency Flood Map, for Land to the West of Hatfield Lane which confirms that the site is located in Flood Zone 1.**

In accordance with the National Planning Policy Framework (NPPF) and associated technical guidance, Flood Zone 1 comprises land assessed as having less than 1 in 1000 annual probability of river or sea flooding. A Flood Risk Scoping Report prepared in October 2013 on behalf of O&H confirms that the site has a low risk of fluvial flooding with no material impact on the overall developable potential of the site. The potential for flooding from sewers is also considered to be low. This report also suggests that there is no significant risk of surface water flooding within the study site. O&H recommends that the summary of findings in relation to Land West of Hatfield Road contained within the *Site Assessment and Selection Methodology* is amended accordingly.

In general however, O&H are satisfied that the site assessment process has confirmed that the Land West of Hatfield Site is a suitable location for development, is available and that there is an opportunity to bring forwards the sustainable development of the site well within the plan period. The above supporting technical information provides further detail to support the site's suitability.

#### **Policy ANP11 – GENERAL SUPPORT WITH DETAILED OBJECTIONS**

O&H supports Policy ANP11 and considers that it is broadly sound and consistent with national planning policy and the adopted Doncaster Council Core Strategy, 2011 – 2028. However, O&H would like to take this opportunity to request some refinements to the precise wording of elements of the policy to address some outstanding concerns.

#### ***Affordable Housing (relates also to Policy ANP7) - OBJECT***

Within their representations in relation to the Draft Armthorpe Parish Council Neighbourhood Development Plan (January 2014) O&H objected to the wording of

Council accepts that local knowledge indicates there is minor flooding on parts of the site during some periods of inclement weather. However the Parish Council also accepts that the Environment Agency Flood Map confirms the site is within Flood Zone 1. In conclusion, the Parish Council fully accepts there is no significant flood risk to development of Land West of Hatfield Lane.

#### **Policy ANP11**

While O&H support ANP11, they would wish to suggest some refinements, including Affordable Housing, education facilities and Policies ANP26 and ANP 27. The Parish Council, having further considered the Affordable Housing issue, agrees with the concern of O&H about sufficient flexibility regarding viability and deliverability of schemes.

O&H request that to ensure soundness of Policies ANP7 and

Council at this stage.

The Parish Council will agree an amendment to policies ANP10 and 11 along the lines suggested by David Locke Associates - see below.

The Parish Council to agree an

Policy ANP7 and Point 1 of Policy ANP11. In justification of this objection, O&H explained its concerns that the existing wording of the Policies were not in line with Paragraph 173 of the NPPF which requires that careful attention should be paid to understanding viability and costs in plan-making and decision taking. O&H recommended that in order to ensure the soundness of Policies ANP7 and Point 1 of ANP11 in this regard, minor but important refinements should be made to ensure that their wording reflects 'Policy CS12: Housing Mix and Affordable Housing' of the Doncaster Council Core Strategy. This is considered to provide sufficient flexibility to ensure that the viability and deliverability of schemes is considered when determining the proportion, type and tenure split that will be required for residential development schemes.

O&H note that, as outlined within the Council's response to consultation on the draft version of the plan, *Draft Neighbourhood Plan Consultation Replies and Armthorpe PC Response*, consideration is given to the comments made by O&H as outlined above. This document suggests that '*further consideration to be given to the wording of Policies ANP7 and ANP11 to ensure that these policies do reflect the wording of Policy CS12 of the Doncaster Core Strategy*'. O&H also note that there has been no change to the wording of Policy ANP7 or point 1 of Policy ANP11 and would like to reiterate the objections in relation to Policy ANP7 and point 1 Policy ANP11 made in March 2014.

We suggest that the wording of point one of ANP11 is adjusted slightly to:

1. *Affordable housing in situ and in line with Doncaster Council's affordable housing policy requirement of 26%, subject to viability.*

#### **Education Facilities - OBJECT**

O&H acknowledge that the development of the 'Land to the West of Hatfield Lane' will place additional demand on local facilities. O&H note that the proposed allocation of Land at The Lings, West Moor Link Road through Policy ANP10 will deliver between 350 – 400 dwellings. This proposed allocation will provide the same quantum of growth that is anticipated to be delivered through the development of the Land to the West of Hatfield Lane site.

However, a minor, yet key, discrepancy between the two policies is that, although point 2 of ANP11 (West of Hatfield Lane) relates to the provision of **educational facilities**, the wording of point 2 within ANP10 (The Lings) correctly states that "*Education facilities or contributions sufficient to serve the democratic profile of the housing on site*".

ANP11, minor amendments should be made to comply with the wording of Policy CS12 of the Core Strategy by adding "subject to viability" to both policies. The Parish Council agrees with this suggestion.

amendment to policy ANP7 to accord with part of Policy CS12 of the Core Strategy as suggested.

#### Educational Facilities

Regarding educational facilities required as a result of land east and west of Hatfield Lane, the Parish Council agrees that wording which accepts contributions as well as education facilities should be incorporated in both ANP11 and ANP10.

The Parish Council agrees with the addition of the word "contributions" to ensure consistency between policies ANP 10 The Lings and ANP 11 west of Hatfield Lane.

Importantly, the extent of education contributions / facilities required will a) relate to the pupil yield from the proposed development; b) take into account existing capacity in local schools. Only when both of these components are reviewed and considered further as part of a planning application, can it be determined the extent of education contributions required that relate to the proposed development, and whether this results in a need for facilities to be provided on-site.

In light of the above, O&H also consider that it would be premature to pre-determine the location for any potential educational facilities required through the growth proposed by Land at The Lings and Land to the West of Hatfield Lane. O&H consider that it is essential that both policies (ANP10 and ANP11) are identical as both will be subject to the same process to determine appropriate contributions or on-site facilities. O&H therefore suggest that point 2 of Policy ANP11 is amended to reflect the wording of point 2 of ANP10 as follows:

*“Education facilities **or contributions** sufficient to serve the demographic profile of the housing on site”.*

#### **Policy ANP26 / ANP27 - OBJECT**

As noted in respect of Policy ANP11 above, whilst O&H will ensure appropriate contributions and / or facilities are provided in respect of education, this will be determined through an assessment of local capacity alongside the need resulting from the proposed development itself. It will be through this assessment that the appropriate education requirements are determined and if this indicates additional on-site facilities are required, this will be incorporated into any future design work. However, it is not considered appropriate to pre-determine this within Policy ANP27 at this stage as the requirements, including specific land area, are not known. In this respect policies ANP26 and ANP27 are inconsistent with each other and should be reviewed as policy ANP26 correctly indicates that education requirements may actually be represented through extending facilities or commuted sums.

#### **Compliance with Doncaster’s Core Strategy (2012)**

O&H considers that the Armthorpe Neighbourhood plan will provide an opportunity to establish a shared vision for the development of Armthorpe which will identify the most sustainable and suitable locations for development to

#### **ANP 26 and ANP 27**

The Council accepts that ANP 26 and ANP 27 are inconsistent with each other as presently expressed and should be amended. The Parish Council will, therefore, delete the old Policy ANP 27 as such and retain the policy narrative by including it as part of the re-numbered ANP 28 (previously ANP 26).

The Parish Council agrees that compliance with the Core Strategy is essential as far as the

**Policy ANP 26 (re-numbered Policy ANP 28) will be amended to include the old ANP 27 as an option and become bullet point 4.**

**The old Policy ANP 27 will be deleted.**

<p>provide homes, services, open spaces, facilities and infrastructure to support new and existing elements of the local community. Crucially, the scale of development that is allocated at 'Land West of Hatfield Lane' makes a significant contribution to the housing requirement of Armthorpe as set out in the Doncaster Core Strategy (Policy CS2). Fundamentally, the allocation of this site will secure the green wedge consistent with Doncaster's Core Strategy (Policy CS17) and ensure coalescence between Armthorpe and Edenthorpe is restricted.</p> <p>Furthermore, the single ownership of this site by O&amp;H means that there are no constraints to its delivery and, subject to the timing of the planning application process, the implementation of development here is capable of meeting the phasing requirements of Doncaster's growth as set out in their Core Strategy policy CS10.</p> <p>O&amp;H are committed to the continued development of this shared vision which has been outlined within the Second Draft Armthorpe Neighbourhood Plan. O&amp;H will continue to support the Parish Council and the community of Armthorpe to bring forward the plan through independent examination and subsequent referendum.</p> <p>I hope that these comments provide a useful and constructive set of recommendations which will assist the Parish Council to further enhance effectiveness, sustainability and the robustness of the Neighbourhood Plan. These representations do set out a small number of outstanding issues that we are confident can be resolved through collaborative working with the Parish Council ahead of the examination of the Plan. Therefore, O&amp;H look forward to retaining ongoing engagement with the Parish Council and with the Neighbourhood Plan process, including participation at the forthcoming examination and subsequently as part of any planning application process.</p> <p>If you have any queries in relation to the comments made within this letter, if you would like me to expand on these comments or if I can be of any further assistance, please don't hesitate to contact me.</p>	<p>Neighbourhood Plan is concerned and the Parish Council acknowledges that the Neighbourhood Plan achieves that compliance.</p>	
<p><b>APPENDIX 1</b></p> <p><b>ADDITIONAL TECHNICAL INFORMATION AND CLARIFICATIONS TO SITE SELECTION METHODOLOGY FORM – SITE 474, WEST OF HATFIELD LANE</b></p>	<p>The Parish Council welcomes the additional technical information and clarifications to Site Selection Methodology Form – Site 474 West of Hatfield Lane.</p>	

Criteria	Summary of Existing Assessment	O&H Comment / Recommendation		
<b>Suitability</b>				
How would development of this site relate to the surrounding uses	However, the development is clearly a significant urban extension on the Northern edge of Armthorpe but unlike Grange Farm, it does not lead to coalescence of Armthorpe and Edenthorpe.	O&H consider that, in addition to the fact that the proposed development will not result in coalescence, the proposals will help secure a permanent green edge to Armthorpe and provide a high quality and sympathetic edge to the urban extent of the existing village.		
How is the site currently accessed?	From Hatfield Lane; a new junction will be required. Access to the A630 is close by...cont.	<p>An initial Transport Appraisal has been undertaken by O&amp;H's engineering consultants in December 2013. This concludes that the site is well related to a network of footpaths and cycleways and public transport.</p> <p>O&amp;H are working in partnership with the developers of 'The Lings' to ensure that the planned new roundabout on Hatfield Lane is designed to accommodate both developments. Early work has shown that in highway terms the allocated scale of development is deliverable. It is likely that some additional local highway and access improvements will be required. These would be determined as part of the planning application process.</p>		
<b>Environmental Considerations</b>				
Important green space / Sites of European Importance / national importance / local importance	Thorne and Hatfield Moors as SSSIs are noted as being over 800m away	<p>An Ecological Assessment, including Phase 1 Habitat Survey and desk-based assessment, was produced in respect of the site by O&amp;H's ecological consultants in July 2014.</p> <p>This confirmed that there are no statutory designations of nature conservation value within the site or immediately adjacent to it. Sandall</p>		

		<p>Beat Local Nature Reserve LNR / SSSI is located approximately 2 km to the southwest of the site. Initial considerations indicate that the physical extent of separation from the site will provide a barrier to any impacts upon the LNR / SSSI.</p> <p>The site is not subject to a non-statutory designation. However there are a number of non-statutory sites within close proximity to the site. The nearest non-statutory designation is a Local Wildlife Site, Long Plantation, situated approximately 20m to the north of the site beyond the A630 and is undergoing active positive management. There is also another Wildlife Site, Hags Wood, 0.2km to the southwest comprising ancient replanted woodland, this site is also undergoing active management.</p> <p>The scale of development proposed and existing management of local wildlife sites indicates there would not be any significant adverse impacts from the development.</p> <p>Importantly, no evidence of the presence of protected or notable species or associated habitats were recorded on site.</p> <p>Some trees and the pond may be of landscape value and the proposals will seek to retain these where possible.</p> <p>Therefore, no overriding ecological constraints have been identified.</p>		
Community Facilities and Services – Distance to facilities and public transport / cycle paths &	Various indications of closest amenities provided.	It is worth noting that the Transport Appraisal (December 2013), mentioned above, confirms the existing location of bus stops for the 81 and 82 bus services. A good		

footpaths		<p>proportion of the developable (i.e. not green wedge) site is within 400m walking distance of the existing bus stops.</p> <p>Furthermore, there may be the potential to incorporate new stops for these services to provide greater proximity to a wider extent of the proposed residential units, this will be reviewed further as part of the scheme evolution and detailed proposals and any further Transport Assessment.</p>		
<b>Other Key Considerations</b>				
Which flood risk zone does the site fall within?	Zone 1 – but part of the site is known to flood and this may affect building on it.	<p>A Flood Risk Scoping Study was produced by O&amp;H's engineering consultants in October 2013. This confirms the site falls entirely within Flood Zone 1.</p> <p>It also indicates that there are no main rivers in the immediate vicinity of the site and minor drains and watercourses in the surrounding area would have limited catchments and not present significant flood risk to the site. Therefore there is low risk of fluvial flooding.</p> <p>The minor pond on the site is small and therefore no significant flood risk is associated with it.</p> <p>Based on available records the existence of sewers in the vicinity of the site is limited and therefore as is the risk of flooding from them.</p> <p>There is a limited run of foul sewers and a pumping station present immediately adjacent to the southern site boundary. Appropriate considerations of easements will be taken into account in any future</p>		

		<p>development to ensure the sewers systems are afforded residual protection.</p> <p>Given the generally agricultural character of the land within and adjacent to the site, it is not anticipated that a significant risk would be present from surface water flooding. There are no steeply sloping areas of land which would shed pluvial run-off towards the study area.</p> <p>Development on the site would introduce a proportion of impermeable hardstanding area related to roofs, highways and external areas. Therefore, as with all development, the surface water run-off rate will be increased when compared to the existing situation. Appropriate management of surface water discharge will ensure no adverse impacts on flood risks elsewhere.</p> <p>Sustainable Drainage Systems will be an integral part of the design proposals and will seek to provide effective surface water drainage for the future development and ensure it is discharged appropriately.</p>		
Ecological Potential		<p>As noted in relation to environmental considerations above, the Ecological Assessment importantly indicated no evidence of the presence of protected or notable species or associated habitats were recorded on site.</p> <p>Habitats on-site generally comprise of common and widespread species which are of limited intrinsic value.</p> <p>Some trees and the pond may be of landscape value and the proposals</p>		

		<p>will seek to retain these where possible.</p> <p>Therefore, no overriding ecological constraints have been identified. The provision of certain enhancements, potentially including bird and bat boxes, will be considered as part of any future planning application.</p>		
Significant Infrastructure / Utilities	Overhead powerlines through site. Utilities available subject to local connections.	<p>O&amp;H's engineering consultants produced a Foul Water and Utilities Assessment in December 2013.</p> <p>This confirms the presence of a power line running east – west through the site. Additional power lines are also present adjacent to / within surrounding roads including the A630 and Hatfield Lane. As are gas mains and water and drainage apparatus. This includes the water extraction boreholes close to the northern boundary of the site. Telecommunications apparatus is also present within the footpath along Hatfield Lane.</p> <p>Initial discussions with statutory providers have been undertaken and these will be continued as part of any further planning application. Initial correspondence indicates there is sufficient capacity to accommodate the scale of development proposed. The design of the scheme will consider any required offsets and the appropriateness of any connections and diversions.</p> <p>In conclusion the site is well served by all utilities and at the time of the report there are no capacity constraints for the proposed development.</p>		

		<p>There is the potential to divert the overhead line through the site, although further discussions with Northern Powergrid are required.</p>		
<p>* Please note that the information in the first two columns is a summary of the information provided in the original form.</p>				
<p><b>TANGENT PROPERTIES</b></p> <p>1.1 Tangent Properties wishes to make a formal representation in respect of the draft Armthorpe Neighbourhood Plan.</p> <p>1.2 In order to comply with the National Planning Policy Framework (NPPF) any Neighbourhood Plan must conform to the strategic policies of the relevant Local Plan. As paragraph 184 of the NPPF states:</p> <p><b>“Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan..... Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.”</b></p> <p>1.3 To comply with the NPPF it is clear that the Armthorpe Neighbourhood Plan must conform to the strategic policies of the Doncaster Local Development Framework Plan (LDF). In this regard, we note that the Doncaster LDF Sites &amp; Policies DPD has been formally withdrawn, following an independent inspector’s report, as this “higher order” Local Plan has been determined unsound, failing to comply with the NPPF.</p> <p>1.4 Should the Armthorpe Neighbourhood Plan be taken forward at this stage then at best it is premature bearing in mind that</p>		<p>The ANP is in full conformity with the Adopted Core Strategy, which is still extant and will remain in place until a Local Plan replaces it by being adopted as the Statutory Local Plan. It is the Draft Sites and Policies DPD which has been withdrawn to allow the Site Selection/Flood Risk, etc. issues to be clarified</p> <p>1.4 The Parish Council does not accept that the appropriate local</p>	<p>No action is, therefore, required by the Parish Council.</p> <p>1.4 No action is, therefore, required</p>	

<p>the appropriate Local Plan fails to comply with the NPPF or, more worryingly, unsound itself since it has been informed by a non-compliant Local Plan.</p> <p>1.5 We understand that the Doncaster LDF Sites &amp; Polices DPD has not been based upon objectively assessed development needs (a key requirement of the NPPF). In particular, an up to date Strategic Housing Market Assessment has not been prepared to estimate housing need within the borough. Housing estimates have been based upon evidence from 2004 and the Regional Spatial Strategy, a document which has been withdrawn.</p> <p>1.6 In addition, there are other issues with respect to the Sites &amp; Policies DPD, for example the methodology used for site selection and the balance of employment land/housing numbers. Consequently, there are multiple reasons why the plan and the adopted Core Strategy have been considered unsound by an independent inspector and hence the Council's decision to withdraw it.</p> <p>1.7 Our understanding is that it will be at least the turn of this year before the Strategic Housing Market Assessment has been prepared and a revised site assessment methodology adopted. Only then will the evidence base be sufficient to recommence the revised Sites &amp; Policies DPD. In short it is likely that it will be some considerable time before a new draft Local Plan is in place.</p> <p>1.8 In these circumstances we would suggest that the most appropriate course of action would be to withdraw the Armthorpe Neighbourhood Plan and pursue it only when the following have been undertaken:</p>	<p>plan "is the Doncaster Local Development Framework Sites and Policies DPD." On the contrary, the adopted Doncaster Core Strategy is the appropriate Local Plan. Doncaster MBC is preparing a Local Plan for the whole of Doncaster Borough using the most up to date evidence available. Until the Local Plan is completed and adopted, the adopted Doncaster Core Strategy will remain a Statutory Plan for Doncaster, supported by any "made" Neighbourhood Development Plans within its area. The Neighbourhood Plan, in order to comply with NPPF, must be consistent with the DMBC Core Strategy and in the Parish Council's opinion, and Doncaster MBC's opinion, it is.</p>	<p>by the Parish Council</p>
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- Completion by DMBC of a fully updated Strategic Housing Market Assessment and revised site assessment methodology; and
- Submission by DMBC of a revised Sites & Policies DPD which can direct appropriate and evidence based levels of housing and employment growth to its settlements (including to Armthorpe).

1.9 To proceed otherwise would fail to meet the requirements of the NPPF which seeks both a sound evidence base for all plan making and a Local Plan to provide clear strategic policies to inform and direct a Neighbourhood Plan.

### PEGASUS GROUP

We write in response to the consultation on the Second Draft Armthorpe Neighbourhood Plan on behalf of the current landowner of the Armthorpe Shopping Centre, Sheet Anchor Evolve Ltd. We made a representation on the earlier stage of consultation in respect of Policy ANP23 of the First Draft Neighbourhood Development Plan. Please find enclosed a copy of our previous correspondence.

We are again writing to make a representation against Policy ANP23 of the Second Draft Neighbourhood Plan, which seeks to maintain existing employment and/or service trade uses within the commercial centre. The Parish Council response to our previous representation stated that:

*"Pegasus object to the Policy ANP 23 of the Draft Neighbourhood Plan which seeks to maintain existing employment and/or service trade uses within the commercial centre. Pegasus further argue that ANP 23 is not flexible enough to conform with National Planning Policy Framework and its presumption in favour of sustainable development. The way ANP 23 is drafted Pegasus argue, restricts the range of uses to employment and service ones and excludes cultural, community and residential uses referred to specifically in paragraph 23 of the NPPF."*

*The Parish Council accepts that ANP 23, as drafted, is not as flexible as para 23 of the NPPF. However, ANP 23 does not exclude non-employment and non-service uses, instead requiring developers to demonstrate unviability of the existing use and that it has been*

### Policy ANP 23

The Parish Council accepts that the market testing period under the old ANP 23 (re-numbered ANP 25) should have been reduced to six months in the first draft. Having further considered this matter, the Parish Council accepts that the NPPF is generally encouraging of flexible policies. The reference to a six month's unviability test, should, therefore, be deleted in favour of a general statement more in line with para. 23 of the NPPF.

**Policy ANP 23 (now renumbered as Policy ANP 25)**  
The Parish Council will, therefore, amend the policy to exclude the six month unviability test in favour of a general statement in line with para. 23 of the NPPF.

*advertised for sale or lease for twelve months without success. Having reviewed Policy ANP 23 again, the Parish Council feels the criteria requiring unviability to be demonstrated should be maintained but "market testing" could be reduced to six months."*

The action by the Council on this point stated that:

**The Parish Council feels that the period of market testing required under APN 23 should be reduced to six months in the circumstances.**

The Parish Council accepted that the Policy as drafted is not as flexible as Paragraph 23 of the National Planning Policy Framework. However, the period of market testing has not been reduced to six months, as was indicated would be the case in response to our previous representation. The wording of the policy in the Second Draft Neighbourhood Development Plan is identical to that of the First Draft Neighbourhood Development Plan, requiring a period of twelve months market testing. From previous feedback, this should have been reduced to six months.

However, in addition to this, the Parish Council response makes the point that in ANP23, non-employment and non-service uses are not excluded, but developers are required to demonstrate unviability of the existing use. Even if reduced to six months, this would still apply a priority on an employment use of the site, unless this is found to be unviable over a period of six months. However, the National Planning Policy Framework does not give priority to certain uses over others and recognises the importance of a range of uses being needed in the town centre. As previously outlined, the priority being afforded to employment uses is not representative of the flexibility of uses which the National Planning Policy Framework identifies as being needed in town centre locations.

Paragraph 23 of the NPPF specifically refers to cultural, community and residential uses. These important town centre uses are not within the employment or service trade uses that draft policy ANP23 seeks to retain. The wording of the policy is therefore still unduly restrictive against non-employment uses, and the policy should be drafted to accommodate more flexibility in future land uses, in accordance with National Planning Policy.

In summary, we feel that whilst our comments were clearly considered by the Parish Council, the suggested course of action in reducing the market testing period to six months was not implemented. In addition, we would like you to reconsider the requirement for any market testing, in view of the range of uses needed in town centres and the fact that National

<p>Planning Policy does not give priority to employment in the range of uses required in town centres.</p> <p>We would be grateful if you would take our comments into account when drafting the next version of the Armthorpe Neighbourhood Plan. We would also be grateful if you could keep us updated on the progress of the plan and notify us of any consultation process in the future.</p>		
<p><b>NATURAL ENGLAND</b></p> <p>Thank you for your consultation on the above received 16 September 2014.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England has no comments to make regarding the amendments to the plan however we note from the SEA Screening Opinion provided by Doncaster Metropolitan Borough Council that Thorne and Hatfield Moor’s nightjar foraging areas are present in close proximity to the proposed employment allocations. We consider that this issue is not satisfactorily addressed in the baseline information nor the appraisal of policy ANP12: Major Employment Allocations.</p> <p>Whilst Natural England has no records of nightjar in this area, we advise that you consult the council regarding this issue and that should nightjar be foraging on site appropriate avoidance measures will need to be built into Policy ANP12 to avoid impacts.</p> <p>Furthermore we advise that nightjar are a qualifying species of the Thorne and Hatfield Moors Special Protection Area. Where a Neighbourhood Plan could potentially lead to significant environmental effects it will be necessary to screen the Plan in</p>	<p>There is a specific reference to Nightjars in Policy CS16 point C of the Doncaster Core Strategy. However, the Core Strategy Policy does not apply to the Armthorpe Neighbourhood Plan, as the proposals in it are all beyond 3 kms from the Special Protection Area.</p> <p>However, the Consultation Response from Natural England refers to the SEA Screening Opinion provided by DMBC, which stated that there is a possibility of Nightjar habitat foraging areas being affected by the ANP proposals. DMBC has since confirmed that a Screening Opinion under the</p>	<p>No action is required by the Parish Council, as this Core Strategy Policy does not apply.</p> <p>No action is, therefore, needed by the Parish Council as the Habitat Regulations also do not require it in this instance.</p>

<p>relation to the Habitats Regulations. One of the basic conditions that will be tested at Examination is whether the making of the plan is compatible with European obligations and this includes requirements relating to the Habitats Directive.</p> <p>In relation to the Habitats Regulations, a Neighbourhood Plan cannot progress if the likelihood of significant effects on any European Site's qualifying species cannot be ruled out (either alone or in combination with other plans and projects) (see Schedule 2, The Neighbourhood Planning (General) Regulations 2012). Therefore measures may need to be incorporated into the Neighbourhood Plan to ensure that any likely significant effects are avoided in order to secure compliance with the Regulations. A screening exercise should be undertaken if there is any doubt about the possible effects of the Plan on European protected sites.</p> <p>For any queries relating to the specific advice in this letter please contact Merlin Ash on 0300 060 4271 or via email at <a href="mailto:merlin.ash@naturalengland.org.uk">merlin.ash@naturalengland.org.uk</a>. For any new consultations, or to provide further information on this consultation please send your correspondences to <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a></p>	<p>Habitat Regulations is not required because Nightjars are understood to forage within 3 kms. of their breeding areas and the allocated ANP sites are further than 3 kms from Thorne and Hatfield Moors.</p>	
<p><b>HIGHWAYS AGENCY</b></p> <p>Thank you for your consultation of 21 August 2014 on the second draft of the Armthorpe Neighbourhood Development Plan (NDP). The Highways Agency welcomes the opportunity to comment on the second draft of the NDP and has reviewed the document with our primary area of interest, the safe and efficient operation of the Strategic Road Network (SRN), in mind.</p> <p>The Agency has previously commented on the initial draft of the NDP and has highlighted the need to identify the traffic impact of development planned for the area, which still applies. The</p>	<p>The Parish Council accepts the need to amend this reference to transport assessments, as they are</p>	<p>The Parish Council will amend the reference to</p>

<p>previous responses provided by the Agency also highlighted that Transport Assessments should support all types of development and not just development that includes the provision of education facilities, although this reference is still in the document. It is unclear why no account of these comments has been taken in the document and no changes made when the comments have been accepted by the Parish Council, and clarification on this is sought from the Council.</p> <p>I trust the above comments are helpful and I await your response on the point raised. However, if you wish to discuss any issues in relation to the document then please do not hesitate to contact me.</p>	<p>required for any development, which has a significant transport impact and not just education facilities.</p>	<p>transport assessments along the lines suggested by the Highways Agency – see new Policy ANP 17 and the deletions to supporting text in the last paragraphs of ANP 10 and ANP 11.</p>
<p><b>ENVIRONMENT AGENCY</b></p> <p>Thank you for consulting us on the second draft of your Neighbourhood Development Plan.</p> <p>Having considered the revisions made we are satisfied that the previous issues we have raised have been taken into account, and the revised site selection methodology has not resulted in any sites in high flood risks zones being identified and allocated. We noted that your website refers to amendment of policies ANP10 and ANP11 due to there being no Appendix 3 – the policy in the second draft on page 17 still refers to Appendix 3.</p> <p>We have no further comments to make.</p>	<p>The Parish Council agrees that reference to Appendix 3 needs to be deleted from page 17.</p>	<p>The Parish Council will delete reference to Appendix 3 in Policy ANP 11 on page 17 of the Draft Plan.</p>
<p><b>NATIONAL GRID</b></p> <p>National Grid has appointed AMEC to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the current consultation on the above document.</p> <p><b>National Grid infrastructure within Armthorpe Parish Council’s</b></p>		

**administrative area**

Electricity Transmission

National Grid's high voltage electricity overhead transmission lines within Armthorpe Parish Council's administrative area that form an essential part of the electricity transmission network in England and Wales include the following:

<b>Line Ref.</b>	<b>Description</b>
4ZH line	400 kV overhead transmission line from Thorpe Marsh substation in Doncaster to Brinsworth substation in Rotherham

Gas Transmission

National Grid has no gas transmission assets within Armthorpe Parish Council:

Electricity and Gas Distribution

Northern Power Grid owns and operates the local electricity distribution network in Armthorpe Parish Council. Contact details can be found at [www.energynetworks.org.uk](http://www.energynetworks.org.uk).

National Grid Gas Distribution owns and operates the local gas distribution network in Armthorpe Parish Council area. If you require site specific advice relating to our local gas distribution network then information should be sought from:

National Grid Plant Protection  
National Grid, Block 1, Floor 2  
Brick Kiln Street  
Hinckley  
LE10 0NA  
[plantprotection@nationalgrid.com](mailto:plantprotection@nationalgrid.com)

**Specific Comments**

National Grid welcomes the opportunity to comment on the Armthorpe Neighbourhood Plan. As a general comment we would like to suggest that in the future, for ease of use (particularly for those stakeholders not familiar with the local context) that the Parish Council clearly reference the sites on the Proposal Map or identify them elsewhere in the Plan document. For example without local knowledge it is not immediately obvious which site is 'The Lings' or 'West of Hatfield Road', additionally we were simply unable to identify the location of the three sites in ANP 12. It should be noted that at the time of

The cartographic issues raised by National Grid have not been raised by any other consultees. However, the points made are noted and the appropriate adjustments will be made.

The Parish Council will improve the mapping documents to identify all the allocated sites.

viewing there were two different versions of the consultation document available for download on the Parish Council website.

From a review of the Proposals Map it is evident that National Grid's overhead 4ZH 400kV electricity line is located in close proximity to a proposed residential site (assumed to be 'The Lings') and a proposed employment site (unclear which sites reference this is - ANP12?).

It would also appear that the 4ZH overhead line crosses the local employment site at Gunhills Lane (existing and extension).

Whilst National Grid acknowledges the Green Wedge included within appendix 2, it is evident that a number of sites are either crossed or located in proximity to National Grid's high voltage overhead transmission line. Accordingly we request that the following comments are taken into consideration.

We would also recommend that prior to submission, the layout, graphics and presentation of sites is reconsidered to provide greater clarity.

Sites crossed / in close proximity to National Grid's 4ZH overhead electricity line

National Grid does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place our equipment on their land. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. Because of the scale, bulk and cost of the transmission equipment required to operate at 400kV National Grid only supports proposals for the relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by central government. Therefore we advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments.

National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to

The Parish Council fully accepts the Consultation Responses from National Grid and the need, therefore, for development to be located in accordance with the statutory requirements regarding safe distances from pipe lines, electricity networks and other infrastructure for which National Grid is responsible. The Parish Council agrees that a policy is necessary requiring developers to take account of design and safety standards of National Grid infrastructure.

The Parish Council has added a new Policy ANP 18 requiring developers to take account of National Grid infrastructure and ensure that there are no buildings directly beneath overhead power lines; and that all other design and safety standards for National Grid be complied with.

overhead lines.

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which look at how to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines.

'A Sense of Place' is available from National Grid and can be viewed at:

<http://www.nationalgrid.com/uk/Senseofplace/Download/>

Further information regarding development near overhead lines and substations is available here:

<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohlfinal/pdf/brochure.htm>

### **Map of National Grid Assets**

Please find attached in Appendix 1, a map identifying the sites outlined above in relation to the affected National Grid asset.

### **Further Advice**

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from

This is noted with thanks.

the National Grid website or by contacting us at the address overleaf:

- National Grid's commitments when undertaking works in the UK - our stakeholder, community and amenity policy;
- Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties; and
- A sense of place - design guidelines for development near high voltage overhead lines.

Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Julian Austin  
Consultant Town Planner  
[n.grid@amec.com](mailto:n.grid@amec.com)

AMEC E&I UK  
Gables House  
Kenilworth Road  
Leamington Spa  
Warwickshire  
CV32 6JX

I hope the above information is useful. If you require any further information please do not hesitate to contact me.

#### **Annex: Overview- National Grid**

National Grid is a leading international energy infrastructure business. In the UK National Grid's business includes electricity and gas transmission networks and gas distribution networks as described below.

##### Electricity Transmission

National Grid, as the holder of a licence to transmit electricity under the Electricity Act 1989, has a statutory duty to develop and maintain an efficient, co-ordinated and economical transmission system of electricity and to facilitate competition in the supply and generation of electricity.

National Grid operates the national electricity transmission network across Great Britain and owns and maintains the network in England and Wales, providing electricity supplies from generating stations to local distribution companies. We do not distribute electricity to individual premises ourselves, but our role in the wholesale market is key to ensuring a reliable and quality supply to all. National Grid's high voltage electricity system, which operates at 400,000 and 275,000 volts, is made up of approximately 22,000 pylons with an overhead line route length of 4,500 miles, 420 miles of underground cable and 337 substations. Separate regional companies own and operate the electricity distribution networks that comprise overhead lines and cables at 132,000 volts and below. It is the role of these local distribution companies to distribute electricity to homes and businesses.

To facilitate competition in the supply and generation of electricity, National Grid must offer a connection to any proposed generator, major industry or distribution network operator who wishes to generate electricity or requires a high voltage electricity supply. Often proposals for new electricity projects involve transmission reinforcements remote from the generating site, such as new overhead lines or new development at substations. If there are significant demand increases across a local distribution electricity network area then the local network distribution operator may seek reinforcements at an existing substation or a new grid supply point. In addition National Grid may undertake development works at its existing substations to meet changing patterns of generation and supply.

#### Gas Transmission

National Grid owns and operates the high pressure gas transmission system in England, Scotland and Wales that consists of approximately 4,300 miles of pipelines and 26 compressor stations connecting to 8 distribution networks. National Grid has a duty to develop and maintain an efficient co-ordinated and economical transmission system for the conveyance of gas and respond to requests for new gas supplies in certain circumstances.

New gas transmission infrastructure developments (pipelines and associated installations) are periodically required to meet increases in demand and changes in patterns of supply. Developments to our network are as a result of specific connection requests e.g. power stations, and requests for additional capacity on our network from gas shippers. Generally network developments to provide supplies to the local gas distribution network are as a result of

overall demand growth in a region rather than site specific developments.

### Gas Distribution

National Grid also owns and operates approximately 82,000 miles of lower-pressure distribution gas mains in the north west of England, the west Midlands, east of England and north London - almost half of Britain's gas distribution network, delivering gas to around 11 million homes, offices and factories. National Grid does not supply gas, but provides the networks through which it flows. Reinforcements and developments of our local distribution network generally are as a result of overall demand growth in a region rather than site specific developments. A competitive market operates for the connection of new developments.

### **National Grid and Local Development Plan Documents**

The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK's energy infrastructure during this period. There will be a requirement for:

- an expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations); and
- new forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites).

Our gas and electricity infrastructure is sited across the country and many stakeholders and communities have an interest in our activities. We believe our long-term success is based on having a constructive and sustainable relationship with our stakeholders. Our transmission pipelines and overhead lines were originally routed in consultation with local planning authorities and designed to avoid major development areas but since installation much development may have taken place near our routes.

We therefore wish to be involved in the preparation, alteration and review of Development Plan Documents (DPDs) which may affect our assets including policies and plans relating to the following issues:

- any policies relating to overhead transmission lines, underground cables or gas pipeline installations;

<ul style="list-style-type: none"> <li>• site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines;</li> <li>• land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations;</li> <li>• any policies relating to the diverting or undergrounding of overhead transmission lines;</li> <li>• other policies relating to infrastructure or utility provision;</li> <li>• policies relating to development in the countryside;</li> <li>• landscape policies; and</li> <li>• waste and mineral plans.</li> </ul> <p>In addition, we also want to be consulted by developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised</p>		
<p><b>GORDONS LLP</b></p> <p>We act on behalf of a number of landowners who have property interests in Armthorpe and we have previously made representations on behalf of our clients in relation to the Armthorpe Neighbourhood Development Plan (“the Armthorpe NDP”).</p> <p>We have considered the position which was reported to Members of the Full Council of Doncaster Metropolitan Borough Council (“DMBC”) on 25 September 2014 relating to the withdrawal of the Sites and Policies Development Plan Document (“the SPDP”) following the conclusions of the Inspector and the subsequent confirmation that the SPDP would be withdrawn and a new single Local Plan to be prepared for the Borough of Doncaster.</p> <p>In the context of the Armthorpe NDP, we are particularly interested in the fundamental areas of concern that the Inspector raised regarding the soundness of the SPDP. These being:</p> <ul style="list-style-type: none"> <li>• The need for the housing requirement to be updated in the</li> </ul>	<p>The Parish Council does not accept what Gordons say in this matter.</p> <p>Doncaster Metropolitan Borough Council’s (DMBC) Local Development Framework Core Strategy remains adopted and is the statutory plan. The ANDP must therefore be compliant with the strategic policies in it. Both DMBC and the Parish Council are satisfied that the ANDP conforms to the Core Strategy. Furthermore, there is nothing in the legislation to stop or slow down the production of a Neighbourhood Development Plan.</p> <p>At this advanced stage in the process of producing the ANDP, it is</p>	<p><u>No action required by the Parish Council.</u></p>

<p>Core Strategy following a review of the Strategic Housing Market Assessment to include an Objectives Assessed Need and up to date evidence on the jobs and housing balance.</p> <ul style="list-style-type: none"> <li>• The site selection methodologies and sustainability appraisal criteria needed to be clearer.</li> </ul> <p>The principal issue here is that the new NPPF compliant “objectively assessed housing need figure” necessitates changes to the adopted Core Strategy in order to take account of new housing targets. The process that the DMBC has decided to follow is to progress a new Local Plan to replace the current Core Strategy and as a result there is a new “Call for Sites” to be considered for development in the new Local Plan. This can (and most probably will) include sites that will have not been previously considered.</p> <p>This Report to Full Council also states that the new Local Plan will be progressed as quickly as possible and will need to be prepared alongside the emerging Neighbourhood Plans. We wish to highlight and clarify this point; that being that the Neighbourhood Plans must be progressed in conjunction with the new Local Plan taking account of that new evidence base.</p> <p>Our strong contention is that the Armthorpe NDP cannot be progressed any further until the new Local Plan has been significantly progressed as it is predicated on an evidence base which must be reviewed due to the requirements of the NPPF. Such requirements are in accordance with the Inspector’s observations on compliance with the NPPF and recent litigation in the Courts on these issues of principle.</p> <p>In the representations that we made on behalf of our clients on the Armthorpe NDP, we found it to be inadequate in many respects</p>	<p>considered that just because DMBC has decided to prepare a new Local Plan for the Borough, there is no justification for discontinuing the ANDP. This is particularly so, as it is considered that (a) the current SHMAA is still the latest available and should therefore continue to be used as the basis for calculating housing need and (b) a review of the SHMAA may have little effect on the demand for housing in Armthorpe.</p> <p>Gordons iteration that the ANDP to is inadequate and seriously flawed, the Parish Council previously rebutted most of the points made in this respect. Other outstanding matters were addressed when the Parish Council decided to repeat the site selection process using a methodology developed by consultants, URS Limited and enhanced by the Parish Council using numeric scores. Both the original methodology and the URS one produced similar results. Additionally, a Sustainability Appraisal/SEA was produced on the advice of DMBC, despite it obtaining Counsel’s opinion to the effect that there was no necessity to produce one.</p>	
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<p>and overall, seriously flawed. Given the DMBC's decision to prepare a new Local Plan based on updated evidence and national policy, the only legitimate conclusion is that Armthorpe NDP should be subject to the same review and it cannot be continued until the Local Plan has progressed sufficiently.</p> <p>The Armthorpe NDP is certainly not well advanced and therefore it cannot be excluded from the scope of the new Local Plan. If it is or any planning application is based on the considerations of the Armthorpe NDP then we strongly contend that those decisions would be open to challenge by way of judicial review.</p> <p>We should therefore be grateful for confirmation that until the new Local Plan has been prepared and the evidence base established, the Armthorpe NDP must be put in abeyance.</p> <p>We have also sent this letter to DMBC.</p> <p>We look forward to hearing from you.</p>	<p>On 16<sup>th</sup> December 2014 the Parish Council approved the draft ANDP for submission as a proposal to DMBC, in accordance with the statutory regulations.</p>	
<p><b>LIZZI M</b></p> <p><b>Consultation Response                      DN3 2HJ</b></p> <p>I would like to raise the following issues in response to this consultation.</p> <p><b>Land and Site Allocation</b></p> <p><b>I object strongly to land West of Hatfield Lane site being allocated for housing development.</b></p> <p>This land currently provides green space, farming land, and a natural barrier to the community of Edenthorpe known as the GREEN WEDGE and forms part of the <b>Countryside Policy Protection Area</b> at present. This should be preserved as it is. I note that the green wedge at the South of the village appears to cover a significantly greater acreage than that planned for the north which seems</p>	<p>The Parish Council notes this objection to allocating land west of Hatfield Lane for housing development. However, the amount of land required for housing stems entirely from the adopted Core Strategy's assessment of housing need in the Borough and the most</p>	<p>No change be made to the land west of Hatfield Lane, which is one of 2 sites preferred by the Parish Council following thorough consideration of the</p>

<p>unfair.</p> <p>This land gives a rural outlook to the area and is in keeping with the heritage of a farming community which according to your vision is important.</p> <p>I have great concern about the proposed land allocation especially since Edenthorpe appear to be considering developing at the other side of the link road to the motorway. How much WEDGE will there be then? Very little!</p> <p>I think development being planned in Edenthorpe needs to be brought into the equation when reviewing where housing should be sited in Armthorpe. You state that the Grange Farm site would not preserve a gap. Neither will this development should both occur.</p> <p>Significant development has taken place in Armthorpe within the last decade which has put pressure on roads and schools, and I feel that should be enough reason to go back to DMBC to refute any housing allocation they are trying to impose on Armthorpe.</p> <p><b>Transport Links</b></p> <p>Planned development will always add to traffic congestion. This would add considerably to the traffic to the Armthorpe Village Centre.</p> <p>You should not agree to development which you state will cause congestion. If you recognise this as a problem then you should be going back to DMBC and saying it is unworkable.</p>	<p>suitable general locations for the additional housing. Armthorpe Parish Council, therefore, only has choice over the location of the housing allocations, not whether there should be more housing in Armthorpe. It also follows that an urban extension is inevitable in Armthorpe. To the west and east of Armthorpe there are Core Strategy Planning Policies, which seek to protect countryside by the Countryside Protection Policy, Sites of Special Scientific Interest designation and Green Wedge. In selecting the land West of Hatfield Lane and East of Hatfield Lane, the Parish Council feels that development here will have the least visual impact on Armthorpe. Indeed, this was the conclusion of the Inspector and Secretary of State when they decided an Appeal on The Lings, East of Hatfield Lane.</p> <p>Transport Links: It is agreed that planned development will always add to traffic congestion, or at least in most instances and certainly in the case of Armthorpe. This is why the Parish Council fully accepts that Transport Impact Assessments are necessary for any proposal that will</p>	<p>alternatives and the various representations by land owners, developers, commerce, business, public utilities and the views of Armthorpe residents and interest groups.</p>
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<p><b>Education</b></p> <p>It is quite clear that the schools cannot accommodate the expected yield from younger families moving into the area, without significant development. Extra space has just been provided at one primary school in the area to accommodate the demand caused by previous development.</p> <p>It would seem that Parish Councils are more attuned to the expected windfall of Section 106 monies (required by law from development companies) used to extend and improve the infrastructure of the village rather than listen to the views of residents upon whom the new development impacts.</p> <p><b>Industrial Areas</b></p> <p>I object to this parish considering allocating land for Industrial Development when there is an allocated space at Edenthorpe for a business park already. The HUNGERHILL INDUSTRIAL Site remains a green field and has done so for a significant period of time. Surely existing approved sites around Doncaster should be developed before allocating more.</p> <p><b>I reiterate, I object to the Neighbourhood Plan on its allocation of housing development and proposals for further industrial development.</b></p>	<p>generate significant volumes of traffic to add to the already congested streets in the village.</p> <p><b>Education:</b> It is accepted that primary schools in Armthorpe will not be able to accommodate additional pupils if the proposed development in Armthorpe goes ahead. Options include a new school and/or an extension to an existing one. Developers will be required by the attachment of planning conditions, or through the community infrastructure levy (CIL) to contribute to funding the additional places on a pro rata basis. The Parish Council does not view this as a windfall necessarily but as part of the planning process.</p> <p><b>Industrial Areas:</b> The Hungerhill Lane Employment site is required for development, as well as the sites in Armthorpe. The market has thus far preferred to develop in and around J4 on the M18. Part of this land has recently been granted Planning Permission for an Employment Site. The view of the Inspector conducting the Public Inquiry into The Lings / Site No. 422 was the need to avoid</p>	<p>For the reasons set out by the Parish Council, there is a</p>
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	<p>prejudicing the preparation of the ANP by granting permission prematurely. Regarding the land to the south of Armthorpe, the Parish Council regards its development as much more intrusive in its impact on the urban form of Armthorpe. The Parish Council has also rejected the Grange Farm alternative in order to avoid coalescence of Armthorpe with Edenthorpe.</p>	<p>need for both additional housing and employment land to comply with the DMBC Core Strategy and also the National Planning Policy Framework.</p>
<p><b>JOHN MARSH</b></p> <p>I strongly object to the proposed development of between 400 and 800 houses on the site west of Hatfield Lane, for the following reasons:</p> <ul style="list-style-type: none"> <li>• the increase of traffic will cause further congestion in an already heavily congested village.</li> <li>• the increase in children, into the area, will cause overcrowding problems within the two schools affected. Section 106 money will not compensate for the problems that this will cause.</li> <li>• this is a Countryside Policy Protection Area and should remain so. Building houses on this land will have a detrimental affect on the outlook and environment of the village. The proposed 'green wedge' will not offset the damage caused by increased traffic, increased pollution and increased footfall</li> <li>• building on this land will virtually link us with Edenthorpe. There is the possibility that houses will be built on the Edenthorpe side of the link road. This will join the two villages and Armthorpe will effectively lose it's identity.</li> </ul>	<p>The Parish Council accepts that the proposed housing and employment developments in the Draft ANP will inevitably cause an increase in traffic volumes and also exacerbate overcrowding problems in local primary schools. However, there are measures which can be taken to reduce the impacts, for instance by encouraging greater use of public transport and retaining as much of the proposed Green Wedge as is reasonably possible.</p>	<p>The Parish Council in producing the 2<sup>nd</sup> Draft Neighbourhood Plan must comply with the adopted Doncaster Core Strategy and the National Planning Policy Framework, in order to meet the demands for additional housing and employment during the Plan period 2012 to 2028.</p>

<p>It strikes me that these plans are motivated by the lure of extra money coming into the village rather than any concern for the people living here. I strongly urge the Council to, for once, put the people of Armthorpe first and stop the proposed development of site no. 474.</p>		
<p><b>C. WALTON</b></p> <p>I must congratulate you on the hard work you have all put into the second Armthorpe neighbourhood plan, the proposal of a green wedge around the village protecting some of the countryside is marvellous. I once again would like my comments recorded that the land proposed is in fact the right choice for the village of Armthorpe</p>	<p>The Parish Council welcomes the support from C. Walton for the proposals put forward in the Second Draft Plan.</p>	<p>No action is, therefore, required by the Parish Council.</p>
<p><b>A. &amp; M. WALTON</b></p> <p>We have lived in Armthorpe all our lives and seen it grow to its present Size. The thought off 900 more houses here fills us with dread mainly Because of the traffic it will bring to our already crowded roads.</p> <p>We still have the letter from 2012 from the Dept of Local Government Turning down the last appeal to allow building, we can't see any improvement in the roads since then.</p> <p>We also have concerns regarding Schools, Doctors etc coping with the excessive numbers 900 houses will bring to the village, also public transport.</p> <p>We understand that if the building goes ahead there has to be Affordable Housing for people struggling to get a starter home. We hope it's these people that benefit and not the Builders that make a fortune from any possible building.</p> <p>We are hoping our village can stay as it is and not get any worse.</p>	<p>These objections are noted; the Parish Council agrees that traffic is already a serious problem in Armthorpe. However, there are measures, such as planning conditions, which would help to ameliorate the impact of additional traffic flows. Such measures can include free buses say for two years to encourage residents to use public transport rather than their cars. Regarding schools and medical facilities, again, in granting planning permission, DMBC, as local planning authority, can require developers to contribute to additional facilities that may be required, either under Section 106 or using the Community Infrastructure Levy instead.</p>	<p>Action is, therefore, required to address these issues by the many public and private agencies and bodies which shape and influence communities and where they live and work. The Neighbourhood Plan is just one mechanism that communities can now use.</p>

