Doncaster Local Plan
Informal Consultation:
Draft Policies & Proposed Sites

Consultation Booklet & Questions

September 2018
A new Local Plan

We need a new Plan to shape how Doncaster develops: how we want it to look and feel; and the policies and proposals needed to guide development to the right places whilst protecting and improving the environment and people’s quality of life.

The Local Plan is used to decide planning applications and guide investment into the Borough. It delivers the new homes, businesses, jobs, shops and infrastructure needed over the next 15 years. It will replace the 1999 Unitary Development Plan and 2012 Core Strategy.

We want to know what you think

Please help us shape the Plan because it is important – it affects many aspects of people’s lives. Before the more formal stages of Plan preparation, when it becomes harder to have an influence, we want your views. This booklet summarises what we are consulting on, asks questions and gives links to the consultation documents.

We are however not starting from scratch – consultations have already taken place. We also do not have free reign to decide the Local Plan – it must comply with the law and Government policy, in particular the National Planning Policy Framework. All the consultation documents and further information, including on earlier consultations, is available: http://www.doncaster.gov.uk/localplan

How to respond

Please respond to the questions in this booklet (but you don’t need to answer them all) by completing the separate response form. Please respond by 5pm 26th October 2018. If you have any questions, or want to respond in another way, please:

➢ Email: localplan@doncaster.gov.uk
➢ Phone: 01302 734419

Privacy Notice

Please note that all responses will be made public, including name and address, although not personal contact information.

The Council is committed to meeting its data protection obligations and handling your information securely. You should make sure you read and understand the Planning Services privacy notice, which sets out what you need to know about how Doncaster Council will use your information in the course of our work as a Local Planning Authority.
What we are consulting on:

- Local Plan Vision and Objectives
- Policies and Proposals – to help decide future planning applications
- New sites – for housing, employment and minerals – and selection methodology
- Evidence Base and Designations
  - Development Limits – Identification Methodology
  - Economic Forecasts & Housing Need Assessment
  - Employment Land Needs Assessment
  - Green Belt Review
  - (Local) Green Space Selection Methodology
  - Housing and Economic Land Availability Assessment (HELAA)
  - Infrastructure Plan
  - Local Plan Viability Testing
  - Minerals Requirements
  - Retail, Leisure and Town Centre Study (Part 3)
  - Settlement Background Paper
  - Wind Energy Development Background Paper

- Sustainability Appraisal – assessing the Plan for environmental, social and economic impacts

Local Plan Vision and Objectives

Working with ‘Team Doncaster’ (Doncaster’s ‘Strategic Partnership’ of organisations and individuals from the public, private, voluntary and community sectors), an overall Vision for how Doncaster will grow and develop over the next 15 years has been prepared for the Local Plan. Delivery of this is supported by a series of Objectives (as well as the Policies below). Responses to previous consultations on the Vision have been taken into account.

Q 1. Do you agree with the Vision and the Objectives? If not, how should they be amended?

Policies and Proposals

More than 70 policies have been drafted, covering a range of topics that need to be considered when deciding planning applications. The following briefly summarise the policy topics. Draft policies are available to view. This is the first time policies have been issued.

Q 2. Do you agree with the policies? If not, how should they be amended? (Please quote policy number(s) when commenting).

Q 3. Are any there any missing policies?

Q 4. Can you suggest issues that must be explained by explanatory text to aid interpretation and implementation of the policies? (Please quote policy number(s) when commenting).

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1 Designations are protected areas or areas where specific policies apply.
Strategic Approach

Sets a ‘hierarchy’ for the future growth of settlements, directing most new development to Doncaster ‘Main Urban Area’, then to 7 ‘Main Towns’, then to 10 ‘Service Towns and Larger Villages’. Sets policy to be applied to smaller ‘Defined Villages’ and also to development in the Green Belt and to other countryside. Identifies how much housing and employment is needed and how much should be ‘allocated’ in individual settlements; specific sites are identified. Policy also included for existing employment areas.

Doncaster Sheffield Airport

Policy to support development and expansion of the Airport, including operational uses but also additional and conditional housing land with the delivery of housing linked to the proven delivery of jobs, ensuring the area is capable of being accessed by a variety of transport types and not just by cars. Development will be expected to link better with the existing communities near the Airport whilst minimising environmental impact. The Airport owners have recently consulted on a Master Plan to cover the next 20 years – the Local Plan will support this where appropriate to do so.

Town Centres

Policies to support the Borough’s town and other centres for shopping, leisure and other uses. Policy included to minimise the harmful impacts (such as on health) from excessive provision of betting shops and hot food ‘take-aways’.

Countryside

Policy to assess development in the countryside (but outside of the Green Belt – where National Policy will apply) such as conversion of rural buildings, new and replacement dwellings, and business, commercial and tourism proposals.

Green and Blue Infrastructure / Natural Environment

Policies to protect and enhance landscapes, ecological networks, open spaces, geodiversity, biodiversity, waterways, woodlands, trees and hedgerows.

Historic Environment

Policies to protect and enhance historic buildings (nationally and locally ‘listed’), conservation areas, historic parks and gardens, and archaeology.

Design & Built Environment

Policies to ensure new development is well designed, respecting (or where necessary enhancing) local character and what makes places distinctive. Separate policies to assess residential and non-residential development proposals, and to encourage high standards of safety, security and amenity.

Health & Wellbeing

Policies to ensure proposals promote healthy communities; protect existing, or provide, new education, community and leisure facilities; and avoid or minimise risks from pollution and contaminated land.

Housing

Policies to support affordable housing, houses in multiple occupation, existing residential areas and the specific needs of gypsies, travellers and travelling show people.

Transport

Includes policy for improvement to the Borough’s roads, rail, bus and freight transport; for promoting sustainable transport; parking in Doncaster town centre; lorry parking; and cycling and walking. Also policy to guide provision of telecommunications and utilities infrastructure including reducing the need to travel.
Climate Change, Flooding & Resources

Policies to address and adapt to climate change; ensuring development takes account of flood risk and drainage; promotes the supply of low carbon and renewable energy; and protects and enhances Doncaster’s soil resource and water supply.

Policies are provided to meet the needs for minerals extraction; including identifying existing and new sites for extraction, ‘areas of search’ for future supply and safeguarding areas for beyond the plan period. Reclamation of former sites is promoted; and policy is proposed to set out how any ‘gas or oil’ proposals would be assessed.

Delivery: Developer Contributions and Viability

Policy is provided to require developers to mitigate the impacts of development by contributing, either financially or in-kind, to, for example, affordable housing, school places, open space, other infrastructure, etc. However, such provision must not make development unviable – a separate policy setting out how this will be assessed is also provided.

Spatial Proposals

A number of policies for specific sites and areas are suggested including Doncaster, Thorne and Mexborough town centres; and the Unity mixed use regeneration project at Stainforth/ Hatfield.
New Sites for Housing, Employment and Minerals

Site Selection Methodology

To ensure the Local Plan proposes the most sustainable development sites (allocations), that conform with national planning policy, and will deliver the plan’s Vision and Objectives, a site selection methodology has been developed. The methodology set out a number of stages that sites are consistently assessed against – including the legal requirement to take account of Sustainability Appraisal.

Earlier consultation (late 2015) on site selection methodologies for housing, employment (including mixed use) and minerals sites are available. A summary of comments and our response is now published.

Sites

New sites are proposed for allocation in the Local Plan for housing, employment and minerals extraction. These are shown on maps, organised by individual settlements for housing, with minerals and employment sites shown separately.

Q 5. Do you agree with our selection of potential Site Allocations?

Q 6. Are there any potential Site Allocations that you think we have missed?

Q 7. Do you have any comments on individual sites as shown in the following location maps and schedule of sites? (Please quote reference number(s) when commenting).

Q 8. Do you agree with the proposed boundary of the Site?

Q 9. Do you agree with the identified proposed use(s) on the Site?

Q 10. Are there any special local issues or problems that could affect future development of the site that should be identified?

Q 11. Are there any restrictions that should be put on future development of the site, for example, in terms of use or buildings?

Q 12. Are there any conditions that should be met before development of the Site?

Evidence Base

All of the following documents are available to view on the Council’s website.

Development Limits – Identification Methodology

Report explaining the methodology used to define settlement ‘development limits’ proposed as a new approach in the Local Plan (in Policy 2 – Spatial Strategy & Settlement Hierarchy). Once complete this work may impact on the ‘Small Sites Review’ – sites received as part of the Call for Sites, which are too small for allocation – which will need revising.

Q 13. Do you agree with the proposed methodology?
Economic Forecasts & Housing Needs Assessment

Independent report by consultants which is a key part of the evidence to setting targets for the overall amount of housing and employment land in the Borough.

Q 14. Do you have any comments on the Report?

Employment Land Needs Assessment

Report to help inform setting target for overall amount of employment land in the Borough.

Q 15. Do you have any comments on the Assessment?

Green Belt Review

Land can only be taken out of the Green Belt, or added to it, through the Local Plan process. A review of Doncaster’s Green Belt has been carried out by independent consultants. The Review does not itself make any decisions but is used alongside the Site Selection Methodology to identify Local Plan site allocations. Stages 1 and 2 were previously published – including a Strategic Review of how broad areas of Green Belt perform against nationally defined Green Belt ‘purposes’; and a review of the ‘Countryside Policy Area’ (i.e. that part of Doncaster’s countryside that lies outside of Green Belt).

Stage 3 is now published – this assesses the implications of removing specific sites from the Green Belt.

Q 16. Do you agree with the Green Belt Review methodology and results? (Please quote reference number(s) if commenting on individual sites).

Local Green Space Selection Methodology

Green areas identified by local communities that rules out development other than in very special circumstances.

Q 17. Do you agree with the Methodology and proposed sites?

Housing and Economic Land Availability Assessment (HELAA)

Process that helps identify an initial pool of sites as ‘suitable, available and achievable’ for housing and employment development, from which site allocations can be selected.

Q 18. Do you have any comments on the HELAA?
Infrastructure Plan

This sets out plans for delivering infrastructure and services across the Borough over the Local Plan period – what is needed, how much it will cost, and how it can be funded and delivered. It includes transport; education; green spaces and routes; health; flooding and drainage; community, sport and cultural facilities; energy and telecommunications; and utilities.

Q 19. Do you have any comments on the Infrastructure Plan?

Local Plan Viability Testing

Independent report by the District Valuer to consider the impact of Local Plan policies on likely development proposals in the Borough.

Q 20. Do you have any comments on the Local Plan Viability Testing Report?

Mineral Requirements Evidence

- Local Plan: Mineral Requirements (including SA)
- Assessing Mineral Site Representations
- Mineral Safeguarding Areas
- Hydrocarbons Evidence Base

Evidence base documents to guide the identification and sustainable use of minerals.

Q 21. Do you have any comments on the Minerals requirements evidence?

Retail, Leisure and Town Centre Study (Addendum)

Addendum to earlier published independent Retail, Leisure & Town Centres Study with advice on sequential and impact assessments to inform proposed Policy 23 (Locating Town Centre Uses).

Settlement Background Paper

Explains how the housing, employment and retail strategies for the distribution of new development has evolved. It sets the context for the Site Selection Methodology for housing and employment sites and supports proposed Local Plan Policies 2 and 3 (spatial strategy, settlement hierarchy, levels and distribution of growth).

Q 22. Is the proposed spatial strategy sufficiently clear and coherently explained?

Q 23. Do you agree that we should use the figure of 407 hectares for the amount of employment land rather than the 2015 figure which was 474 hectares?
Q 24. Do you agree with the proposed means of deciding broadly where new housing and employment sites should be located?

Q 25. Do you have any alternative proposals for how housing and employment sites could be distributed?

Q 26. Do you agree with the approach to retail provision?

Q 27. Are you satisfied that this approach will see the borough grow in the correct way over the plan period?

Q 28. Do you agree with the revised approach to Defined Villages?

**Wind Energy Development Background Paper**

Report explaining the proposed approach to Wind Energy, and suggesting Areas suitable for Renewable Wind Energy Development (‘Areas of Search’) in the Local Plan.

Q 29: Do you agree that areas of search within which sites may be potentially suitable for wind energy development should be identified within Doncaster?

Q 30: Do you have any views on the methodology identified for establishing areas of search within which sites may be potentially suitable for wind energy development?

Q 31: Do you have any views on the proposed area of search for wind energy developments?

Q 32: Do you have any comments on the draft Wind Energy developments policy (Policy 60)?

**Sustainability Appraisal**

Sustainability Appraisal (SA) (including Strategic Environmental Assessment) assesses the significant environmental, social and economic effects of the Plan’s preferred sites and policies; the “reasonable” alternatives to the Plan’s proposed strategy and proposals; and the reasons for discounting alternatives. Mitigation is proposed to avoid, minimise and compensate for negative effects and to maximise positive effects.

SA is an integral part of the Council’s site selection process for identifying new sites for housing, employment and minerals and is now published for consultation.

We previously consulted on the SA Scoping Paper and the SA of the 2016 Homes and Settlements consultation.

Q 33. Do you have any comments on the Sustainability Appraisal?
FAQs - Frequently Asked Questions
Planning is complex but we hope the following answers some of the common questions that you may have. For anything else, please contact us.

Q. Why do we need a new Local Plan?
Q. What is the consultation about?
Q. How can I find out if the Plan affects me?
Q. What if proposed development affects my view or the value of my house?
Q. What progress has been made so far in preparing a new Plan?
Q. What is the next stage? What is the timetable for preparing the Local Plan?
Q. How much development is planned and why?
Q. What do you mean by “Green Belt”, “brownfield”, “greenfield” and “countryside”?
Q. Why is building being proposed in Green Belt and countryside? Why can’t old industrial sites and derelict land be used instead?
Q. Who will be building the houses?
Q. What about schools, GPs, shops, roads and traffic, etc.?
Q. What about the natural and built environment; such as wildlife, landscape, historic areas?
Q. What about Neighbourhood Plans?
Q. Can I see a map of the proposals?

FAQs about new sites for housing, employment and minerals

Q. How have you chosen the sites to develop?
Q. Is this the first opportunity to formally make comments on sites?
Q. Are these the final sites that will feature as allocations in the adopted Local Plan?
Q. Why does the Local Plan not include sites at the Main Town of Armthorpe?
Q. Does an allocated site still require planning permission; and will I be able to have a further say about the development?
Q. Why are some sites, that were originally put forward through the ‘Call for Sites’, no longer being considered, or are now different? Why are there some ‘new’ sites?
Q. Are there any other sites being considered then?
Q. Why do some sites receive more detailed assessment than others?
Q. Why does the capacity of a site change between some documents/ stages of the process?
Q. Why do some of the site boundaries overlap and/or have different capacities assigned to them through different documents?
Q. Why is the total site capacity different to what is being included in the plan period supply for some sites?
Q. Why are different sites in different evidence base documents?

Q. Why do we need a new Local Plan?

Government requires all local Councils to develop a long-term plan which sets out how and where land can be developed over the next 15 years. We have an existing plan but it needs updating because parts of it are old.

Q. What is the consultation about?

The role of this informal consultation (which is strictly not needed according to Government guidance) is to get your views on draft sites for development and on policies and proposals that will be guide decisions on planning applications. The Plan will be used to define the boundaries of settlements and Green Belt – and explain the approach to development proposals in other parts of the countryside.
Q. How can I find out if the Plan affects me?

The Plan contains many positive policies and proposals which together ensure that Doncaster will continue to improve as a place to live, work and visit. Inevitably, however, some people will be directly impacted by new development, for example, where it is near their homes. To find out more, see the maps and information presented by individual towns and villages.

Q. What if proposed development affects my view or the value of my house?

The Planning System exists to take difficult decisions in the wider public interest and meet development needs in the most sustainable way. Unfortunately, this can negatively impact upon views, which can, in theory at least, impact on house values. However, overall new development will bring new investment into Doncaster’s economy and enable people to have a better chance of buying their own home or being employed or to take advantage of planning benefits that often come alongside new investment such as provision of new and/or better equipped open space, etc.

Q. What progress has been made so far in preparing a new Plan?

We have previously consulted on:

- **Call for Sites** (from 2014) – for possible development sites from landowners, developers, etc.
- **Vision, Aims & Objectives** (2015) – a vision for how the Borough will develop by 2032 and aims and objectives that will help achieve it.
- **Issues and Options** (2015) – 3 options for the broad approach to where development should be located.
- **Homes and Settlements** (2016) – approach to the number and distribution of new homes.

Q. What is the next stage? What is the timetable for preparing the Local Plan?

Feedback from this consultation will help us to prepare and consult on a “Publication” draft Plan (scheduled for Spring 2019), to be followed by its submission (in Summer 2019) to Government for an Examination in Public in 2019. We aim to adopt the Plan by the end of 2019.

Q. How much development is planned and why?

We believe there is a need for a total of 920 new homes per year (15,640 in total) over the plan period to 2032. Of this we need to identify specific sites to meet 15 years’ worth or 13,800. This is required to meet natural population growth as well as additional housing we believe is necessary to house additional people arising from the Council’s ambitious plans to encourage economic development and new jobs. To support this we believe there is a need for at least 407 hectares of employment land. Calculation of housing need and employment land required is complex – the Council’s evidence and further information is set out in the Local Plan’s evidence base.

Q. What do you mean by “Green Belt”, “brownfield”, “greenfield” and “countryside”?

These are terms used to refer to the status of land in the planning system.

Greenfield land is simply land that has not been developed before. This land has no statutory protection in its own right unless it is subject to some form of protective designation (e.g. a Site of Special Scientific Interest, Green Belt, etc.).

“Brownfield” is land that has been previously developed. It is usually, but not always, in urban areas.

Green Belt is a ‘statutory’ designation where strict planning controls apply in order to prevent the further growth of a large built-up area, prevent neighbouring towns from merging and/or preserve the special character of a town. Its boundaries are defined, and can only be amended, by a Local Plan. Individual parcels of land within the wider Green Belt can be either greenfield or brownfield. The physical characteristics of a site are not the deciding factor – it is the policy designation in the plan that matters.

Not all of Doncaster’s “countryside” is Green Belt – only the western half of the Borough. In Doncaster, countryside will be defined as the land outside of Green Belt and beyond settlement development limits.
Planning controls restrict development in the countryside, but there are greater opportunities for new development where justified in line with national and local planning policy.

**Q. Why is building being proposed in Green Belt and countryside? Why can’t old industrial sites and derelict land be used instead?**

Our surveys and analysis show that we simply do not have enough brownfield land or other land within the urban area for the amount of new housing required to meet our target. Therefore, we need to identify land in the countryside and in the Green Belt land where urban extensions could be considered. The amount of Green Belt land that may be required will depend on the final selection of sites which are being consulted upon.

**Q. Who will be building the houses?**

Most of the houses will be built by private developers. The Council does now have a programme for building new council houses but the number is small compared to the overall amount required.

**Q. What about schools, GPs, shops, roads and traffic, etc.?**

The Local Plan has looked at where new facilities and infrastructure such as schools, shops and roads are required and how they will be provided; either by developer contributions or public finance. An indicative list of required infrastructure is included in the Infrastructure Delivery Plan. The Council has fully engaged with infrastructure providers, such as Yorkshire Water and the local education authority, in preparing its Local Plan. They have not identified any 'showstoppers'. Consideration has been given to the impact identified sites will have on congestion and the availability of public transport links to transport interchanges and to the borough’s ‘Strategic Highways Network’. Concerns regarding the impact of additional traffic in specific areas will also be thoroughly considered by the Council in the determination of planning applications. The Council has also prepared a strategic transport model to consider the high level impacts of new development throughout the Borough. This will be used in any future transport assessments prepared by developers in seeking to promote development on their site. In negotiating on submitted planning applications the Council will utilise this model to best effect to determine the works required to mitigate negative transport impacts arising from the development proposals. The Local Plan will include policies which support the provision of local shops and community facilities.

New and improved infrastructure is required to support the additional housing and employment development and the requirements will be agreed with the infrastructure providers. All sites allocated within the local plan are still required to go through the usual formal planning application process. Detailed discussions of improvements required will take place at this stage. If the Council feels these are not adequately addressed planning permission will be refused.

The Planning System requires development to contribute financially or otherwise to meeting its infrastructure needs. The Council may decide to prepare a ‘Community Infrastructure Levy’. However, at present the existing system of seeking contributions (‘Section 106’ agreements) is the preferred method in Doncaster – but this will be kept under review.

**Q. What about flooding?**

Flooding is a major constraint on development in some parts of the Borough. Maps prepared by the Environment Agency show flood areas by various levels of risk, to help us avoid areas of unacceptable risk. This is supported by a Strategic Flood Risk Assessment. We have assessed all our proposed development sites to establish the risk of flooding. As a result, with the exception of a small number of sites the Council have been able to allocate the vast majority of development in areas at the lowest risk of flooding. Where sites are proposed for allocation for development on land at higher risks of flooding we have demonstrated that they can be delivered appropriately and safely. Planning policies will ensure that new developments have to demonstrate that they can be delivered safely with regard to flood risk, and that they won’t make flooding worse for other areas before they are granted planning permission.

**Q. What about the natural and built environment; such as wildlife, landscape, historic areas?**

The role of the plan is to balance the need for housing and employment growth whilst protecting Doncaster’s unique natural and built environment. This is a key part of the site identification process which uses sustainability appraisal (underpinned by a rigorous evidence base) to help select the most sustainable
sites. The Local Plan will also contain a suite of policies covering all aspects of the natural and built environment that must be considered to inform development proposals and whether to grant them planning permission.

Q. What about Neighbourhood Plans?

We welcome neighbourhood plans and a number of parishes and groups are in the process of producing their own plans. Careful consideration of these is being given during the preparation of the Local Plan. Neighbourhood plans must be prepared in accordance with the Government’s National Planning Policy Framework and should be in general conformity with the strategic policies of the Local Plan. Neighbourhood plans should support the strategic development needs set out in the Local Plan and plan positively to support local development. Officers are working with parishes and groups to ensure this continues to be the case.

Q. Can I see a map of the proposals?

Yes, to view a map please visit the Sustainability Appraisal webpage.

Questions : New Sites for Housing, Employment and Minerals

Q. How have you chosen the sites to develop?

Over 1000 sites have been assessed for development for different uses, mostly as sites for housing and employment. Sites suggested by developers and landowners have been assessed alongside sites we already knew about from previous studies. We have difficult choices to make to identify the most appropriate sites for future development. These sites now suggested are needed to meet the targets for new homes and jobs shown in the Plan. They are the ones that in our view are the most sustainable sites, which will meet the needs of local communities and are not remote from existing communities. Potential sites have been consistently assessed against pre-prepared methodology.

Q. Is this the first opportunity to formally make comments on sites?

Yes. We previously consulted on total development needed, its broad distribution and a draft methodology to select sites. To date, none of these have been site specific.

Q. Are these the final sites that will feature as allocations in the adopted Local Plan?

The sites proposed are those which the Council believe to be the most sustainable, deliverable and developable to meet the Borough’s development needs over the plan period based on the extensive evidence base that has been prepared. However, the sites may change due to public consultation feedback, changes to national planning policy and evidence, late sites, High Court rulings, and as a result of the Plan’s Public Examination process.

Q. Why does the Local Plan not include sites at the Main Town of Armthorpe?

Armthorpe Parish Council has made the decision to develop a Neighbourhood Plan for their Parish which includes decisions on future development sites for their area. The Local Plan will not duplicate this and will defer to the Neighbourhood Plan. As of September 2018, the Neighbourhood Plan has been independently examined and is now progressing towards a referendum for the community to either support, or object to, its adoption. However, please note that some potential employment sites around Junction 4 of the M18 fall outside of the Neighbourhood Plan’s designated area – they are therefore proposed for inclusion in the Local Plan.

Q. Does an allocated site still require planning permission; and will I be able to have a further say about the development?

Allocations are made up of a mixture of sites that already have planning permission (and may even be under construction) as well as ‘new’ sites. New sites will still require a subsequent planning application to
Q. Why are some sites that were originally put forward through the ‘Call for Sites’, no longer being considered, or are now different? Why are there some ‘new’ sites?

Some sites previously suggested have progressed to a planning application outside of the Local Plan process and have been completed. Likewise, further sites have been suggested on an ‘ad-hoc’ basis since late 2014; further sites may continue to be submitted throughout the rest of the Local Plan process. Sites may have come forward for different uses compared to those originally envisaged by the landowner/developer at the Call for Sites stage. Some sites have been asked to be withdrawn from the process altogether, and some have had revised site boundaries submitted.

Q. Are there any other sites being considered then?

The site selection methodology considers all sites put forward for consideration as at early June 2017. As discussed above, further sites have continued to be put forward and others may be received. For transparency, ‘late sites’ put forward by May 2018 have identified on the maps but not considered fully for allocation as they were too late to be considered through the last Housing and Employment Land Availability Assessment (HELAA) annual Update (published May 2017) which is an early stage of the site selection process. The Council will need to consider whether these sites can be incorporated, if considered to be reasonable options, through the remaining stages of Local Plan preparation.

Q. Why do some sites receive more detailed assessment than others?

There has been a significant number of sites put forward for consideration, far more than the Local Plan needs to identify. Some sites are not considered as being a ‘reasonable alternative option for development’ – for example they are isolated or in unsustainable locations where there are no services or facilities. Others may have national planning constraints incapable of mitigation such as sites in the ‘functional flood plain’. In the interests of proportionate evidence and assessment, the methodology filters a number of sites out of the process as it evolves. Where this is the case, the report makes clear which these sites are, and the reason(s) why.

Q. Why does the capacity of a site change between some documents/ stages of the process?

Evidence base documents can only ever be a snapshot at a point in time. Estimates of site capacity are founded in the Housing and Employment Land Availability Assessment (HELAA) 2017 (stage 2) in line with the stakeholder group methodology. Likewise, some of the planning permission capacities change as schemes come back to Planning with revised applications, such as substitution of house types or requests to amend the scheme in light of viability/ market conditions, etc. In these instances, the most up-to-date capacity, derived from the planning permission, has been used.

Q. Why do some of the site boundaries overlap and/or have different capacities assigned to them through different documents?

From the original Call for Sites stage, landowners and developers sometimes submitted sites that overlapped with other sites being promoted. Boundaries sometimes overlap with land granted planning permission. The Council has assessed sites verbatim as they were submitted and has not revised site boundaries – as this can affect how sites perform (ownership, constraints, public consultation response, etc). Instead, the Council has ensured discounting of capacity to avoid any double counting of the same area of land – see HELAA stage 2 for more details. Capacities may have also been revised through latter stages of the site selection process to address constraints for example, or where a site may be being supported for mixed uses. Where this is the case the methodology makes clear the reasons why.
Q. Why is the total site capacity different to what is being included in the plan period supply for some sites?

A handful of very large sites have a total site capacity which is greater than what could realistically be developed during the remainder of the Local Plan plan period to 2032. Although the proposal is to allocate all of the site (these are already planning permissions) there must be a reasonable assumption made as to how much the site will deliver during the plan period to ensure sufficient allocations are made that will meet the borough’s development needs within the plan period. Should sites build out quicker than expected, then this will be an additional supply. Also, some permissions will have been under construction prior to the start of the plan period (1st April 2015) so the figures used only reflect the development still to occur.

Q. Why are different sites in different evidence base documents?

Evidence base documents are commissioned at various stages of the Local Plan process. Given the ever changing nature of sites as discussed above, they can only ever be a snapshot in time understanding. Some evidence base documents may therefore assess sites that no longer need to be assessed, and wouldn't have been included if that evidence base was redone at a different point in time. The various stages of the methodology provides further detail for how the Council has dealt with this, including ensuring that sites have been assessed against the most-up-to-date evidence where changes have occurred so that all sites have been treated equally.