**LOVERSALL PARISH COUNCIL**

**RESPONSE TO DMBC LOCAL PLAN “ISSUES AND OPTIONS” CONSULTATION**

**WITH SPECIFIC REFERENCE TO “CALL FOR SITES” PROPOSALS SITED IN LOVERSALL PARISH**

**This response follows the format of the Local Plan “Issues and Options” online survey. There are two “Call for Sites” proposals located partly or wholly in Loversall parish. Our detailed response to the “Call For Sites” proposals is addressed in the context of the survey questions. Loversall Parish Council objects to both of the “Call for Sites” proposals principally, but not solely, because both of them constitute a completely unjustified intrusion into the Green Belt.**

**CONTEXT**

Loversall Parish Council has provided information to every household in the parish, notifying residents of the existence of the Local Plan and the two “Call for Sites” proposals. The plan and the consultation survey were discussed at a special parish meeting in August. Some residents will find an online survey a difficult way to respond and we are trying to make provisions for these residents. The meeting was very well attended and the Parish Council feels confident that it can speak for the residents.

The Parish Council has also met with parish councillors from Tickhill and Wadworth and district councillor James Hart. We have a common view in general terms about the non-acceptability of the “call for sites” proposals.

**CALL FOR SITES PROPOSALS**

The proposals are entitled***: “Land at Loversall”*** and ***“Land around Wadworth”*** Neither proposal has previously been brought to DMBC’s attention and could not have been considered or evaluated as part of the DMBC *Core Strategy.* The nature of the two proposals is summarised below:

**Site Name: *“Land around Wadworth”*** (Applicant:Foljambe Estate)

* 475 hectares (1173 acres or 1.8 sq miles)
* Large employment park warehousing/distribution
* Neighbouring use – agricultural
* States access to adopted highway (but doesn’t state how access will take place)
* States achievable in 1-5 years
* DMBC map of sites also shows a large housing development adjacent to Wadworth

**Site Name : *“ Land at Loversall”*** (Applicant: N.Lee)

* 13.7 hectares (34 acres or 0.53 sq miles)
* Mixed use but could accommodate 415 dwellings
* States access to adjacent development of the M18 link road
* Start date depending upon the development of the adjacent link road

**ISSUES & OPTIONS SURVEY RESPONSES**

**Q1. IN GENERAL TERMS, WHERE SHOULD NEW HOMES BE PROVIDED IN DONCASTER ?**

* In accordance with Doncaster’s previously agreed *Core Strategy* we believe that most new homes should be provided in the Main Urban Area of Doncaster and in the existing major towns.
* Brownfield sites close to shops, facilities and public transport should be prioritised.
* As far as possible each town and village should get sufficient homes to meet the needs of its own population with the proviso that development should not encroach on the Green Belt.
* We do not agree that development should be led by developers but instead by the needs of Doncaster residents.

 **“CALL FOR SITES” PROPOSALS.**

* **Neither proposal would lead to development in the Main Urban Area or a major town, nor development on a brownfield site but instead in the Green Belt.**
* **Neither proposal would be addressing the housing needs of Loversall residents**
* **Both proposals would wholly be led by the interest of landowners/developers wishing to dispose of their land and would have nothing to do with the needs of the population as described in the *Core Strategy***
* **The *“Land at Loversall”* proposalwould in effect be a new settlement, which is an option already rejected by DMBC. If it proceeded as a housing proposal of 400+ homes this would mean a development with approximately 8x the total number of existing households in Loversall parish. It would need to remain isolated from Loversall itself as there can be no vehicular access from the proposed development into the village without causing traffic chaos and unacceptable safety risk. It would also be an unacceptable disruption to the quality of life of the residents of the conservation village.**

**Q2. WHERE, MORE SPECIFICALLY, SHOULD NEW HOMES BE BUILT ?**

* We support the general thrust of the table provided in the *“Issues and Options”* document, which indicates most growth in the main towns and the Main Urban Area
* We agree that infill building only should be allowed in towns and villages with fewer than seven services and no building beyond the existing envelope for villages with two or fewer services.
* We have no better information than DMBC (as suggested by the *Core Strategy*) to suggest any changes to the share of development in each settlement.

**Q3. WHERE SHOULD NEW EMPLOYMENT OPPORTUNITIES BE PROVIDED ?**

* Whilst appreciating the need for a range of employment opportunities, developments in Doncaster in recent years seem to have been skewed towards the warehousing and distribution sector. We firmly support the aim of the growth plan to support higher skilled jobs and requisite training opportunities.
* The excellent transport links, which are often cited as a reason to attract distribution centres, are the same transport links that would support Doncaster as a business and commercial centre and we believe this should be a key aim of any development plan. As far as possible the development of offices to support this should be in the town centre in order to support the renewal of the town and because there are good public transport links to the town from most other towns and villages in the borough.
* It is obviously advantageous to build hubs of related businesses eg around Lakeside and we support this approach.
* We support the improvement of internal transport links where this would be conducive to development on existing brownfield sites currently remote from major networks.
* Provided that intrusion into the Green Belt can be avoided, it makes sense that job creation takes place close to the residential areas that need jobs. Conversely it makes no sense to develop employment sites close to where there is low demand for employment.

**“CALL FOR SITES” PROPOSALS**

**The proposed “Land around Wadworth” development cannot be supportable:**

* **The proposal is designated as warehousing and distribution and as such is not the type of development that should be supported within a strategy which, as in the *Core Strategy*, seeks to promote higher quality/skilled jobs.**
* **The proposed development is not adjacent to a residential area that requires such an employment development – it has been stated that the nearby Railport will already provide 5000 jobs and further development would represent a huge concentration of employment in a single area.**
* **The development proposes to take 475 hectares out of Green Belt. According to the *Core Strategy* this is equivalent to Doncaster’s total land requirement for employment in distribution/warehousing and light industry combined !**
* **If any further development of this type was actually required then it should be provided within the boundaries of existing development in the M18 corridor area from Rossington to Thorne and not in Green Belt. If the “Broad Location for Growth - Option 2” was adopted, then the proposed A1 corridor near Adwick and Woodlands would be a more suitable location, giving a better distribution of job opportunities across the Borough.**
* **Much of the proposed development appears to be designated on land that regularly floods.**
* **The proposal does not specify how it intends to access the transport network.** **Any access onto the A60 would be strongly opposed; currently there is only a footbridge over the River Torne, with a bridle way linking Wadworth and Rossington. The A60 connects small communities into Doncaster and is inappropriate for heavy traffic and would add to the already unacceptable noise levels .**
* **The DEFRA “Round 1 Noise Maps” show parts of Loversall experiencing average noise levels above 65dB in the daytime and above 60dB at night. The World Health Organisation advises that continuous noise levels above 55dB are potentially injurious to health and that specific health issues are associated with levels above 65dB. Since the “Round 1” mapping was carried out the M18 has been widened between Junctions 2 and 3 and it is highly probable that increased traffic associated with the Railport and better access to the airport will generate even more noise. “Round 2” mapping results for small areas are not yet available but levels are likely to have worsened around Loversall. We have learned that there is an investigation being carried out by the Highways Agency into an “important issue” of noise at Loversall and the Parish Council is awaiting a response to a FOI request about this issue. The proposed warehousing/distribution development at Wadworth, across the road from Loversall, is bound to add to the already unacceptable noise levels to which Loversall residents are exposed. It is not acceptable to knowingly allow a development that puts the health of local residents at risk.**

**Q4. TO WHAT EXTENT SHOULD LAND BE TAKEN OUT OF THE GREEN BELT TO MEET THE BOROUGH’S HOUSING AND EMPLOYMENT NEEDS?**

* The approach to the Green Belt should be In keeping with National Policy guidelines and DMBC *Core Strategy* viz development in Green Belt should take place only if very exceptional circumstances apply. We believe that even on the western edge of the Borough, where development is justified to meet the needs of the local population, encroachment should be avoided unless all opportunities for development on brownfield sites are exhausted.

 **“CALL FOR SITES” PROPOSALS**

**There are proposals for two sites wholly or partly within Loversall Parish, both adjacent to a conservation area and within the Green Belt. These proposals, “*Land around Wadworth”* and *“Land at Loversall”* respectively propose to take 1.8 sq miles and 0.53 sq miles out of Green Belt. The proposals are completely at odds with the policy intent of the Government’s National Planning Policy Framework (NPPF) and also with Doncaster Council’s existing *Core Strategy*. We take the view that the NPPF reflects previous national policy on the Green Belt and therefore should have no impact upon the approach to the Green Belt previously taken by Doncaster in its *Core Strategy* - presumably based upon extensive local research, scenario planning and local consultation. We are totally opposed to either of these proposed developments taking place in the Green Belt in Loversall and Wadworth:**

* **The NPPF states that it *“attaches great importance to Green Belts. “The fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open ; the essential characteristics of Green Belts are their openness and permanence”* (para 79). The *Core Strategy*, whilst pre-dating the NPPF, fully reflects its intent, stating that the national policy will be applied, including the presumption against inappropriate development other than in very special circumstances, for example, where necessary to sustainably deliver the Growth and Regeneration Strategy (ref CS3A).**
* **Doncaster Council has previously established that the Growth and Regeneration Strategy can be delivered without altering the general extent of the Green Belt within Doncaster***:* ***“…development allocations involving Green Belt are expected to be very limited. However, it is possible that Green Belt sites may be more sustainable than non-Green Belt alternatives but the consideration of alternative sites will be across the Main Doncaster Urban Area and all the Principal Towns so that precise allocations to each town within the growth ranges can address a number of objectives including minimising the loss of Green Belt*” (para 3.37)**
* **The NPPF goes on to state that *“Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outside sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land”* (para 81). Again, the *Core Strategy* accords with the new NPPF: *“Proposals which are outside development allocations will only be supported where they would: 1. protect and enhance the countryside, including the retention and improvement of key green wedges where areas of countryside fulfil a variety of key functions; 2. not be visually detrimental by reason of siting, materials or design; 3. not create or aggravate highway or amenity problems; and; 4. preserve the openness of the Green Belt and Countryside Protection Policy Area and not conflict with the purposes of including land within them”* (CS3C) *. And… “The countryside will be more attractive, accessible and vibrant with farm based rural diversification projects”.***
* **The call for sites developments proposed in the Green Belt in and around Loversall and Wadworth would not enhance and protect the countryside, would be visually detrimental, would aggravate highway problems (in Loversall and on the A60), would not preserve the openness of the countryside and would result in the loss of agricultural land.**
* **Objective 9 of the *Core Strategy* refers to “minimising the loss of agricultural land”. Applying DEFRA/National Statistics Office figures for average yields for crops in 2014, then the loss of agricultural land for the “*Land in Loversall”* proposal would result in an annual loss of 118 tons of Cereal (89 tons Barley/ 51 tons oilseed rape). The *“Land around Wadworth*” proposal would result in a loss of 4085 tons of cereal (3087 tons Barley/1757 tons of oilseed rape)**
* **Finally, the The NPPF goes on to say *that “inappropriate development is, by definition, harmful to the green belt and should not be approved except in exceptional circumstances”.*****Paragraph 89 /90 of the NPPF lists the exceptional circumstances, which may be taken into account when considering a proposal for development on the Green Belt. None of the exceptions listed can be said to apply to either of the two “Call for Sites” proposals in Loversall/Wadworth.**

**Q5. TO WHAT EXTENT SHOULD DEVELOPMENT AVOID FLOOD RISK AREAS?**

Evidently, development on flood risk areas should be avoided where alternatives exist but the fact remains that large areas of the Borough are in flood risk areas. Realistically it may be necessary for some development to take place on areas of low /medium flood risk with effective flood defences in place.

**“CALL FOR SITES” PROPOSALS**

**It is known locally that the portion of land identified by the *“Land around Wadworth”* proposal (to the west of Loversall, and near the M18/A1M Junction 2), is prone to flooding. The area is shown as a fluvial flood zone on the Doncaster SFRA maps. Development in this area would be both in a flood zone and on the Green Belt.**

**Q6. HOW CAN WE BEST PROTECT, MAINTAIN AND IMPROVE DONCASTER TOWN CENTRES**

We believe the focus should be that of the existing *Core Strategy* viz developing and building on the existing infrastructure both in Doncaster centre and the other major towns. Specifically we support increased opportunities for living accommodation in the town centre along with office accommodation. Further development of out of town retail outlets should be curtailed.

**Q7. WHAT APPROACH SHOULD BE TAKEN TO DEVELOPING A HIERARCHY OF TOWN, DISTRICT AND LOCAL CENTRES ACROSS THE BOROUGH?**

We support the approach taken in the *Core Strategy*.

**Q8. HOW CAN THE BOROUGH BECOME MORE ACCESSIBLE AND BETTER CONNECTED TO OTHER PLACES?**

* Doncaster already has excellent rail and road links to other parts of the country but modernising the current mainline rail network would help. The challenge would seem to be more to make Doncaster an attractive place to visit, particularly for business and commerce.
* It will be important to ensure that public transport connections within the borough are continuously improved to facilitate movement between the outlying towns and Doncaster town centre, for the purposes of employment and training.
* Linking some of the central land-locked brownfield sites to national networks might reduce the need for development on flood risk areas or Green Belt

**Q9. HOW SHOULD WE ENSURE ENOUGH MINERALS ARE AVAILABLE FOR DEVELOPMENTAND ALSO PROTECT RESOURCES FOR THE FUTURE?**

DMBC should ensure that potential developers identify the economic value of the mineral and the environmental acceptability feasibility of extraction prior to development.

**Q10. HOW SHOULD WE BEST MEET SPECIALIST HOUSING NEEDS ?**

* The rapidly growing elderly population will have special requirements. If DMBC does not already do so they should in future require developers/builders to ensure that all houses and flats are built to flexible *“Lifetime Homes”*  standards - ordinary houses and flats which incorporate 16 design criteria that can be universally applied to new homes. They should also ensure that 10% of new homes are built to fully wheelchair accessible standards. Both of these approaches are endorsed by, amongst others, the Royal College of General Practitioners.
* Given the extensive current provision for Gypsy and Traveller families, further expansion should be limited. Existing Gypsy & Traveller sites should be consolidated rather than taking a dispersal approach.
* We agree that the approach to affordable homes should be flexible, that houses in multiple occupation should not be concentrated in particular areas, and that the viability of a student village should be explored.

**OPTIONS FOR BROAD LOCATION OF NEW GROWTH**

* We agree that the New Settlement, Low Growth and Total Dispersal options should be rejected.
* We do not support the “greater dispersal” strategy option (3) and have qualified support for Option (1)
* **Loversall Parish Council’s preferred option is Option(2)**, which places greater emphasis on development in the Doncaster Main Urban Area and the seven main towns; provides for employment development near Adwick and Woodlands on the A1 corridor, rather than a further concentration near Rossington; allows no further expansion into the green Belt other than the possibility to the west of the Borough – but only if there are no brownfield opportunities remaining in that part of the Borough; allows no further expansion of villages and, outside the seven main towns, confines housing development to existing planning permissions and quality infill opportunities.