

**PRE-REGULATION 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 the land at Grange Farm in response to the pre-regulation draft Armthorpe Neighbourhood Plan [ANP] which was released for public consultation on the 5th August 2013.</p> <p>Before discussing our comments on the ANP it is important to reiterate that with Grange Farm, Miller Homes seeks to create a new, sustainable residential neighbourhood that will become an exemplar of robust, high quality design and of environmental responsibility and excellence. The scheme represents a the only opportunity to;</p> <ul style="list-style-type: none"> <li>• Deliver multiple community benefits (including learning resources, local park enhancements, playgrounds, allotments and mixed-use community hubs), meaning the present and future communities of Armthorpe will have better spaces in which to run, learn, grow food, walk the dog, meet friends or relax;</li> <li>• Increase connections in an intelligent and sensitive way between Doncaster and Armthorpe, resulting in better public transport, pedestrian and cycle situation for Armthorpe, whilst at the same time respecting the important geographical separation; and,</li> <li>• Develop a range of high quality, sustainable and functional homes for everyone that Armthorpe can be proud of as a gateway to the parish. Homes to be built by a HBF 5 star rated national homebuilder and that are achievable, available and ready for delivery now.</li> </ul> <p>This representation expresses a number of principle concerns over the ability to meet the legal requirements of the plan, before turning to address the potential to allocate Grange Farm for residential purposes. A hybrid1 planning application for up to 564 homes</p>	<p>This response focuses on the principles and procedural issues raised by WYG in their submission, rather than the detailed planning policies referred to in Appendix 1 of their document. It is accepted that Grange Farm and Sites 1 and 2 could be developed in compliance with the detailed planning policies referred to in the WYG submission but that is not the issue; the issue here is that the Parish Council has preferred Sites 1 and 2 to Grange Farm in order to meet the strategic housing need as required by the DMBC Local Development Framework Core Strategy.</p>	<p><u>No action to be taken by Armthorpe PC regarding the detailed planning policies referred to in Appendix 1 of their document.</u></p>

(reference 12/02133/FULM) which is pending determination by Doncaster Metropolitan Borough Council [DMBC] and has been on hold whilst the Neighbourhood Plan Process is underway.

**Meeting the legal Requirements of the plan**

We recognise that this document is a ‘provisional draft’ in advance of a formal deposit revision of the plan being released. We welcome the opportunity to comment upon it, however, we do have some concerns that in order for the formal draft ANP to be deemed sufficiently robust we wish to raise.

**1. Alignment with Local Policy**

It is anticipated that the timescales associated with the plan are insufficient to incorporate it into the DMBC Sites and Policies DPD at the relevant time. Whilst it is recognised that; *“Local planning authorities should avoid duplicating planning processes for non-strategic policies where a neighbourhood plan is in preparation,”* (Para 185, NPPF) it remains that the timescales involved are likely to lead to difficulties in reconciliation in the interests of produce a cohesive and flexible strategy. In developing the Neighbourhood Plan after DMBC’s Sites and Policies DPD, there is a risk that the impact of the Neighbourhood Plan on the surrounding area cannot be fully appreciated within the Sites and Policies DPD. This is a potential weakness of this document. We welcome your comments upon the alignment process of the two documents as no reference is currently made to this.

**Meeting the Legal Requirements of the Neighbourhood Plan**

**Alignment with local policy.**

The Parish Council (PC) notes the DMBC Draft Sites and Policies DPD was published for consultation in August 2013 at the same time as the Provisional Pre-Regulation Draft of the Armthorpe NP. The relationship between Neighbourhood Plans and Local Plans and the National Planning Policy Framework is set out in paras. 1.9 to 1.12 in the DMBC Sites and Policies 2013 August, Publication Draft. In general terms, Neighbourhood Plans must conform with strategic policies within the LPA’s Local Plan. Comparison of the Armthorpe Neighbourhood Plan (ANP) Pre-Regulation Draft and the DMBC Sites and Policies Draft DPD clearly reveals that the two documents are closely aligned in terms of the strategic issues of the

The Parish Council is satisfied that the Armthorpe NP is fully aligned with local policy and therefore No action is required by the Parish Council

<p><b>2. Conformity with Local Policy</b></p> <p>Policy CS2 within the adopted Core Strategy identifies Armthorpe as a Principal Town within the settlement hierarchy, setting a housing allocation of between 643 to 923 housing units. In the first instance clear justification should be provided over the chosen level of housing numbers promoted through this informal draft ANP. Whilst it is recognised that the Draft Sites and Policies DPD sets a mid-range number of 735 units, it is important to consider that this is yet to be tested through examination. Aside from the target, the ANP should provide clear evidence over the sites it identifies as available and achievable in meeting this number. We note that Table 1 indicates between 350-400 dwellings for each of</p>	<p>amount and location of housing and employment development. Furthermore, the timescales of the two documents are sufficiently similar to enable a cohesion of the many other policies they contain. Having said that of course, the area of the ANP is but a fraction of the area covered by the DMBC Sites and Policies DPD; many site specific policies and proposals of the two documents, therefore, relate to completely different parts of Doncaster. It is in the very nature of localism that that should be so. Site specific policies especially relating to ANP area will, inevitably, not relate to the DPD Sites and Policies Area as it excludes the ANP area and vice versa.</p> <p><b><u>Conformity with local policy:</u></b></p> <p>The ANP must comply generally with the DMBC Local Development Framework Core Strategy and the DMBC Sites and Policies DPD and the other elements of the re-styled Doncaster Local Plan, because the Core Strategy and Sites and Policies DPD provide the context for neighbourhood plan work. (Again, please see the Draft Sites and Policies DPD / DMBC Core Strategy</p>	<p>The Parish Council is satisfied that the ANP complies generally with the DMBC Local Development Framework and therefore <u>no action is required by the Parish Council</u></p>
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the two sites, but without any evidence base it is unclear as to how these figures have been derived and distributed. We assume that the deposit draft version of the ANP will include this information.

and the Pre Regulation Draft ANP). Armthorpe is identified in the Core Strategy as a principal town within Doncaster's settlement hierarchy and, as such, will accommodate a significant amount of the housing and employment development in Doncaster, as defined in the DMBC Core Strategy and Sites and Policies DPD. The Core Strategy allocates between 643 and 923 dwellings to Armthorpe and the Draft Sites and Policies DPD a mid-range number of 735 dwellings. The evidence for these allocations is drawn from the evidence base for the Doncaster Local Development Framework Adopted Core Strategy and the Draft Sites and Policies DPD.

DMBC has now responded to Armthorpe PC's request for a Screening Opinion about the need for an SA / SEA of the ANP and has stated that an SA / SEA is not required. No

### **3. Need for SEA [Strategic Environmental Appraisal]**

At this stage, there seems to be no clear assessment in terms of SEA or sustainability criteria of those sites that have been promoted to come forward. At page 4 of the plan reference is made to this need and the Department of Communities and Local Government [DCLG] have issued guidance recommending the need for a screening opinion from DMBC officers to ensure compliancy. It is understood from DMBC senior policy officers that the Neighbourhood Plan would be expected to produce some form of Sustainability Statement prior to the formal 6 week consultation period. Again, we welcome a better understanding of this matter.

### **Need for SEA**

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

<p><b>4. Evidence Base</b></p> <p>It is unclear how the policies and site allocations within the document have been arrived at with limited transparency over the evidence base which was used in the production of the plan. With particular regard to site specific policies ANP 10 and 11, it would be reasonable to expect more in depth accompanying analysis which sets out the justification behind the selection process of the housing allocations and why certain other sites were discounted. This is particularly pertinent given the land at Grange Farm clearly aligns with the policies contained within the informal draft ANP. Appendix 1, attached to this representation sets out how the Grange Farm site meets the policy criteria for new development within the informal draft ANP.</p>	<p><b><u>Evidence base</u></b></p> <p>The evidence base for the ANP policies and site allocations is that of DMBC's in preparing the Local Development Framework Core Strategy and associated documents. Thus, policy ANP 1 and the associated narrative and table 1 link back directly to the Local Development Framework Core Strategy Policies CS2: Growth and Regeneration Strategy and CS10: Housing Requirements, Land Supply and Phasing. The ANP narrative goes on to show the link between the development requirements set out in ANP10 and ANP11 and the Local Development Framework policies relating to and addressing flood risk. SP16: meeting the housing requirement of the sites and policies draft DPD is also a key policy in allocating housing land in accordance with the SHLAA / SHMA residential land availability report. Table 1 identifies the sites and indicates the capacity and number of dwellings for each site including Armthorpe, which</p>	<p><u>action is therefore necessary by Armthorpe PC.</u></p> <p>The Parish Council is satisfied that the evidence base supports the ANP policies and site allocations. <u>No action is therefore necessary by Armthorpe PC.</u></p>
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## 5. Deliverability and Availability of allocated sites

There is limited transparency over the reasons for selecting the allocated sites and the way which the informal draft ANP suggests they should be developed. Taking the first point, in order to be found sound it is expected that any allocation of a site should be accompanied by an assessment of that site in terms of deliverability over the plan period. This should take into account all social environmental and economical constraints. This assessment does not appear to have been carried out which is a present weakness of the informal draft ANP. For instance, WYG has historically raised technical concerns over the impact of development along the eastern section of the Westmoor Link Road at the planning appeal for the land at Hatfield Lane (Ref APP/F4410/A/12/2169858). Whilst the Secretary of State judged that the highways measures of the Hatfield Lane scheme would be satisfactory in that case, the allocations represent a different situation, with the added pressure of the development between Hatfield Lane and Mere Lane (Armthorpe Site 2). We remain concerned that potential highway implications from the two proposed allocations have not been given adequate consideration.

Finally, in allocating the chosen sites there remains a lack of clarity over the availability and deliverability of these sites for development over the plan period. To detail, Policy ANP4 acknowledges the ability for 'Barton' lane to deliver some 185 dwellings, however goes on to confirm land ownership issues and existing uses as potential barriers to realising this development. Furthermore, it appears that there is no indication if the layouts produce for Armthorpe Site 1 and Armthorpe Site 2 yield a viable project.

during the plan period is planned to deliver 785 dwellings.

### Deliverability and Availability of Allocated Sites

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

The Parish Council is therefore satisfied that the deliverability and availability of the Allocated Sites is justified in the ANP. No action required by the Parish Council

<p>We would reemphasise that with the Grange Farm site, Miller Homes are ready willing and able to deliver a range of homes to meet the local needs of Armthorpe. The scheme is the only site in north Armthorpe that is being developed directly by a homebuilder, resulting in a truly deliverable scheme.</p> <p><b><u>Allocation of land at Grange Farm</u></b></p> <p>We believe that Grange Farm accords with all relevant policies of the informal draft ANP (see Appendix 1). Grange Farm has organically evolved as a sustainable, gateway project with a strong design identity offering multiple benefits to Armthorpe. 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.</p>	<p>considerations are set out on page 15 and 16 of the ANP in relation to Site 1 where attention is drawn to the need to accommodate a green wedge north of the site. On page 18 the ANP records the same key considerations in relation to Site 2. There can be little doubt about the process and criteria used by the Parish Council to define the major sites for development in accordance with the Local Development Framework Core Strategy and the Sites and Policies considerations.</p> <p><b><u>Allocation of land at Grange Farm</u></b></p> <p>A critical element of most development plans is identifying sites for housing. Because of the very close links between the DMBC Local Development Framework and the ANP, the techniques employed in site selection in the NP follow those used in the DMBC Local Development Framework. The methodology used in both plans is set out on pages 12 to 15 of the ANP Issues Report, January 2013. Armthorpe PC cannot, therefore, agree with the view of WYG that the policies and site allocations have been arrived at with limited</p>	<p>The Parish Council is satisfied with the reasoned justification for not allocating land at Grange Farm, having regard to policies contained in the DMBC Local Development Framework Core Strategy, Sites and Policies DPD Draft, and the Pre-</p>
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<p><b><u>Interpretation of Green Wedge Policy</u></b></p> <p>As set out in our previous letter to Armthorpe Parish Council (dated 15th February 2013) a suitable buffer can be achieved that maintains separation between Armthorpe and Edenthorpe that is supported by adopted policy CS17, 'Map9–IndicativeGreenWedge' (an extract of which is set out on the subsequent page) 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. These assessments also demonstrate the need to allocate green wedge to the south of Armthorpe which we note has not been included within the ANP's spatial mapping. Again, the draft plan makes no reference to this.</p> <p>Extract of DMBC Adopted Core Strategy(2012)'Map9-Indicative Green Wedge' with site overlay</p> <p>Draft DMBC Sites and Policies DPD policy SP37 states that an</p>	<p>transparency. The process is clear and the sites selected satisfy the criteria listed in both the ANP and the DMBC Sites and Policies Draft DPD. It is true that the outcome was not to select Grange Farm, but rather to propose both Site 1 and Site 2 East and West of Hatfield Lane. However, that is in the nature of site selection; not all sites considered are selected and it is the view of the Armthorpe PC that these major sites in particular, have been allocated following a rigorous process of site selection</p> <p><b><u>Interpretation of Green Wedge Policy</u></b></p> <p>Green wedge policy is referred to at various points in the DMBC Local Development Framework Core Strategy, the DMBC Draft Sites and Policies DPD and, of course, the Pre Regulation Draft ANP. Review of the three documents reveals that the ANP follows closely the broad concepts promulgated in relation to green wedges and their various functions. The Grange Farm land is perceived by the PC as an important part of the green wedge separating Armthorpe from Edenthorpe. An inspection of the proposals map shows that quite</p>	<p>Regulation ANP. <u>No action is therefore necessary by the Armthorpe PC</u></p> <p>The Parish Council is satisfied that inclusion of Grange Farm as an agricultural unit in the Green Wedge is in accordance with the DMBC Core Strategy, DMBC Draft Sites and Policies DPD and the Pre-Regulation Draft ANP. There is no justification for</p>
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<p>extensive green wedge buffer should be sought in this location (i.e. between Armthorpe and Edenthorpe). Whilst the draft DMBC Sites and Policies DPD fails to expand on what constitutes an extensive green wedge buffer, it has been confirmed by DMBC that it is not necessary to exclude the entire site from development on this basis. 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>Concern is expressed as to why this draft has promoted a Green Wedge at odds with the approach within adopted DMBC Core Strategy policy and an accompanying technical evidence base. Such an approach does not conform with 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>Further, the Provisional Draft ANP does not justify the rationale behind the chosen layouts and green wedge buffer distances for the allocations identified at the plans entitled ‘<i>Armthorpe Site 1 and Armthorpe Site 2.</i>’ Identifying the justification behind these buffers is critical to the process.</p> <p>We trust that you will take into account these comments to produce a sustainably robust plan which will be able to stand up to scrutiny at the relevant stages of the Neighbourhood Planning process. As a final note we would welcome the opportunity to engage with you on these matters further in preparation for the formal draft version of the ANP.</p> <p><b>Appendix 1 – Policy Alignment of Grange Farm Proposals</b></p>	<p>clearly; residential parts of Edenthorpe are immediately north of the A630 and to the south is the farm land of Grange Farm and the woodland beyond. North of the A630 and east and west of Hatfield Lane is open farmland. The draft ANP proposals retain a green area south of the A630 from the Sainsbury’s Superstore to the proposed employment site west of Westmoor Lane. North of the A630 is an extensive tract of farmland running up to the A18 Thorne Road and beyond on the eastern side of Edenthorpe and Kirk Sandall.</p> <p><b><u>Appendix 1 – Policy Alignment of Grange Farm Proposals</u></b></p> <p>With the exception of the policies</p>	<p>excluding Grange Farm from the Green Wedge and developing it. <u>No action is, therefore, necessary by the PC</u></p> <p>Because Appendix 1 deals with matters of detailed imple-</p>
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<p><b>Policy alignment of Grange Farm proposals</b></p> <p><u>Policy ANP1 – Land allocation total and site allocations</u>  The proposal provides the opportunity to contribute up to 564 homes towards Armthorpe’s allocation that are both demonstrably deliverable and achievable over the plan period.</p> <p><u>Policy ANP2 – Integrating allocated sites</u>  Grange Farm incorporates excellent new connections, investing in routes within Shaw Wood and off-site pedestrian and cycle routes enhancing Armthorpe’s links with Doncaster. In terms of design quality, the masterplan has been produced as a result of detailed technical input and over three years worth of community engagement resulting in a holistic design, supported by DMBC’s Independent Design Review Panel, incorporating a range of housing types which respect their local context. The scheme provides beneficial new facilities, including an eco-learning shelter, mixed use regeneration of the Grange Farm buildings for the benefit of the wider community and developed an informed rationale approach to providing new open spaces incorporating advice from Landscape Architects and Urban Designers.</p> <p><u>Policy ANP5 – Design of New Development [on allocated sites]</u>  Whilst there appears to be no transparent selection process for allocated sites, it is important to clarify that Grange Farm unlike other proposed allocations does meet the expectations of allocated sites within the draft Plan. Commenting on each criterion in turn:</p> <ol style="list-style-type: none"> <li>1. The detailed proposals in the submitted planning application focus on creating an identity for the development, resulting in an attractive and welcoming place. This has included the extensive use of character areas as detailed within the Design and Access statement which contribute towards the positive future identity of Armthorpe.</li> <li>2. The submitted proposals contribute towards a sense of enclosure as appropriate given the low density nature of this location. This</li> </ol>	<p>referring to green wedges in particular, the Appendix refers to detailed planning policies and how far the Grange Farm site could be said to comply with those policies. The PC feels that these detailed planning policies could be satisfied by appropriate development of any of the three major sites; however satisfying detailed planning policy does not support the view that Grange Farm should, therefore, substitute for either Sites 1 or 2 put forward in the pre-regulation draft of the ANP.</p>	<p>mentation of planning policies (with the principal exception of the Green Wedge) the Parish Council does not consider it necessary to comment on Grange Farm’s compliance or not with the detailed policies. <u>No action is therefore considered necessary by the Parish Council.</u></p>
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<p>includes the use of heightened buildings at key gateway points and nodes within the development. More information may be found within the site's Design and Access Statement.</p> <ol style="list-style-type: none"> <li>3. Proposals have been designed in accordance with Secured by Design standards and have been developed to maximise the security of private property and public areas. The highways solution that the scheme puts forward has been confirmed as acceptable by DMBC in terms of highways safety. More information may be found within the site's Design and Access Statement and Transport Assessment.</li> <li>4. Increasing permeability has been central to the proposed scheme's development philosophy, with a dedicated off-site fund for improving local cycleway and footpath connectivity, contributions towards improving access to Shaw Wood and the potential for significant increases in public transport linkages from Armthorpe to Doncaster's Main Urban Area. More information may be found within the site's Design and Access Statement and Travel Plan.</li> <li>5. A legible development is one that provides recognisable routes, intersections and landmarks to help people find their way around, ensuring that the place has a clear image and is easy to understand. Grange Farm achieves this through the use of gateway architecture, central green spaces and clearly signed thoroughfares. More information may be found within the site's Design and Access Statement.</li> <li>6. The site has been designed to ensure future flexibility in use. Examples of this approach include the development of an eco-shelter which is able to be used for a range of community activities and the regeneration of the Grange Farm buildings for adaptable mix of uses. More information may be found within the site's Design and Access Statement.</li> <li>7. The development is inclusive, introducing a range of housing types and sizes (including Affordable Housing) and understands the needs of the locality, unlocking public expertise through three</li> </ol>		
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<p>years worth of meaningful consultation. The planning application provides for the widest range of homes to accommodate all types to meet Armthorpe’s housing requirements. More information may be found within the site’s Statement of Community Involvement and Design and Access Statement.</p> <p>8. The proposals create vibrant places and spaces with active street frontages and a range of uses across the site. More information may be found within the site’s Design and Access Statement.</p> <p>9. The proposal is sustainable in terms of social, economic and environmental interpretations of the concept. Environmentally, the proposals avoid the development of Flood Zone land, avoid the loss of protected Ecological species, reducing the need for motorised journeys through increased connectivity. More information may be found within the site’s Sustainability Statement.</p> <p>10. The proposals deliver all homes to Code for Sustainable Homes Level 4. More information may be found within the site’s Design and Access Statement and Sustainability Statement.</p> <p>A. The site is well related to both the Main Urban Area of Doncaster (specifically the Edenthorpe retail area and high street) as well as the High Street of Armthorpe, supplemented by measures advocated through the plan which encourage the use of non-pollutant travel modes to these locations. More information may be found within the site’s Sustainability Statement and Travel Plan.</p> <p>B. The current masterplan demonstrates an appropriate response to the level of technical and public input that has been provided. In this regard the scheme is sympathetic to the locality, providing housing for all and aiding integration through potential s106 contributions including:</p> <ul style="list-style-type: none"> <li>• Affordable Housing</li> <li>• Enhancement fund for Shaw Wood</li> <li>• Investment in off-site pedestrian and cycle routes, including</li> </ul>		
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<p>new crossings improving links with Armthorpe and Doncaster.</p> <ul style="list-style-type: none"> <li>• Potential for a park and ride facility</li> <li>• 20% on-site open space in excess of adopted DMBC policy standards; including on-site play areas where residents and visitors can play informal sports, walk the dog and have picnics.</li> <li>• Investment in local educational facilities to meet demand.</li> <li>• Community allotments</li> <li>• Eco resource shelter for use by local school and community groups.</li> </ul> <p>C. The development has taken privacy distances and access to daylight and sunlight into account in accordance with Miller Homes standards and guidance documentation such as the South Yorkshire Residential Design Guide (2011). All Miller homes are designed to high standards of quality and space, for example through the use of higher ceilings to allow more light and space. More information may be found within the site's Design and Access Statement.</p> <p>D. The scheme would introduce green landscaping buffers and mounding, softening the relationship with the Westmoor Link Road, and would (through its Green Wedge buffer) ensure that sufficient distances are maintained to ensure that there would be no significant impact on living conditions in terms of privacy. More information may be found within the site's Design and Access Statement.</p> <p>E. Internal living spaces have been designed in accordance with Miller Homes guidelines. More information may be found within the Design and access Statement and detailed housing elevations/ plans.</p> <p>F. The current scheme identifies what is considered a significant level of green infrastructure, encouraging healthy lifestyles and a continuing corridor linking to south, north and central Doncaster. More information may be found within the Design and Access Statement and Sustainability Statement.</p>		
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<p>G. A detailed Tree Survey accompanies the scheme and confirms that there would not be an unacceptable loss in the quantity and quality of trees or hedgerows. The scheme also provides new landscaping features which consolidates the identity and amenity quality of spaces and places. This includes valuable tree retention where possible, native species planting and use of swales/ reed beds in roundabouts and at entrances to provide visual interest and attract wildlife. More information may be found within the accompanying Landscape Strategy.</p> <p>H. All open spaces and playing spaces have been developed centrally as part of a green strategy for the site. They are placed centrally within the site, away from busy roads and in natural, directly accessible nodes. Further information may be found within the Landscape Strategy and Design and Access Strategy.</p> <p>I. Children’s play areas for the site (including several Local Areas of Play and one Local Equipped Area of Play) are to be designed taking account of maintenance, repair and replacement. More information may be found within the landscape strategy and Design and Access Statement.</p> <p>J. The proposed development has included for a robust, and justifiable landscape buffer as set out within the landscape strategy prepared by TPM landscape. This has been informed through Landscape and Visual Impact Assessments and has been developed in consultation with DMBC.</p> <p>K. The development layout has been designed to ensure positive place making that is both attractive and functional, providing landscaped public realm which encourages healthy and inclusive lifestyles. This has included adoption of the Building for Life principles and use of the South Yorkshire Residential Design Guide (2011). More information may be found within the Design and Access Statement.</p> <p>L. All access points operate safely and have been developed using Miller Homes’ industry experience in addition to</p>		
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extensive pre-application consultation with DMBC Highways officers. The proposals offer the opportunity to reduce the intrusiveness of the Westmoor Link Road and give pedestrians and cyclists a greater priority (for example including pedestrian linkages across to Lyndale Avenue). More information may be found within the site's Transport Assessment, Design and Access Statement and Travel Plan.

- M. Car parking has been provided in accordance with Miller Homes' industry experience and DMBC standards; incorporating South Yorkshire Residential Design Guide. A key focus of the development is to treat highways as streets and not as roads. Whilst a high proportion of streets are designed for pedestrian priority, the appropriate levels of street parking have also been incorporated. More information may be found within the proposed site layout and Design and Access Statement.
- N. The site has been subject to detailed boundary treatments to ensure that plot boundaries are defined in a way that respects local characteristics. Boundary treatments range from 1.8m high close boarded wooden fences to dwarf hedges and brick walls to create and define defensible spaces. Further information may be found within the Design and Access Statement and boundary treatment diagrams.
- O. In accordance with Miller Homes' responsibilities as a national homebuilder and in line with the company's standard corporate responsibility policy the site waste management plan will ensure arrangements are made for collection of landfill refuse and other materials. The site's layout further demonstrates the correct road widths for refuse collections and has ensured provision for waste storage. Further information may be found on the site layout and Design and Access Statement.
- P. The site avoided development on the south western section (south of Dodge Dyke) due to the presence of land within Flood Zone 3. It has also incorporated resilience measures in

the form of linear landscaping drainage and across the Westmoor Link Road and Sustainable Urban Drainage mechanisms (including swales) to the South of the proposed development to the west of the site, acting as a buffer between the adjacent Flood Zone 3 areas south of Dodge Dyke. Further information may be found within the site's Food Risk Assessment and Landscaping Strategy.

Policy ANP6 – Provision of New Facilities

The proposed development includes the provision of new facilities such as eco-learning resource, new connective and circular routes, allotments and a mixed use community focal point. Its development and associated highway works also unlock the potential for future development of new community and retail facilities. More information may be found within the site's Design and Access Statement.

Policy ANP7 – Provision of Affordable Housing

The site provides for a level of affordable housing in accordance with policy CS12 of the adopted DMBC Core Strategy. The development meets local need and is in accordance with this policy. Further information may be found within the development's Planning Statement.

Policy ANP8 – Provision of a mix of housing types

The development has provided for a mix of housing types and sizes to ensure flexibility in meeting the current and future needs of Armthorpe and Doncaster. More details may be found within the site layout and Design and Access Statement.

Policy ANP9 – Phasing of housing development

This policy confirms that the phasing of housing will be relation to adopted DMBC Core Strategy policy CS10. As such, sustainable urban extensions will form part of the Council's and Armthorpe's strategy for delivering growth. In terms of sequential release, policy CS10 B) does allow for some flexibility in releasing phase 2/3 sites sooner where proposals help to deliver one or more urban brownfield



sites. The Grange Farm proposals do accord with CS10 B) in this regard as there is potential to upgrade the Sainsbury's roundabout to a signalised junction, utilising land in the applicant's ownership. More information may be found with the site's Transport Assessment.

Policy ANP16 – Pedestrian and Cycle Connections to the village centre

The scheme offers contributions to improve the pedestrian and cycle connections both to Armthorpe and, as a gateway development, to Doncaster's main urban area. For example, it will enhance public footways from Mere Lane, through the site and across the Westmoor Link Road via underpass investment and the creation of a new pedestrian link across to Lyndale Avenue. More information may be found within the Design and Access Statement and Travel Plan/ Transport Assessment.

Policy ANP17 – Encourage better use of public transport

As a gateway site, it offers the potential to encourage a better use of public transport, including offering the potential for a park and ride scheme and public transport penetration into the site (offering a comprehensive circular bus service for Armthorpe). More information may be found within the site's Travel Plan and Transport Assessment.

Policy ANP18 – New development to provide parking on site

The development is in demonstrable accordance with Doncaster Council parking standards. More information may be found within the Transport Assessment and Design and Access Statement.

Policy ANP19 – Developer Contributions

The site provides the opportunity for a significant level of investment in local infrastructure and planning obligations. To detail;

- A. This site is in accordance with part A, as several principles have been agreed in principle to range from on-site provision (including Affordable Housing, SUDs and open space.
- B. There are site specific provisions such as a commuted sum to

Shaw Wood to help deliver improvements, a Travel Plan and the introduction of an extensive green buffer, some 150m wide to prevent the merging of Armthorpe and Edenthorpe.

C. The public realm improvements and investment in design have been central to the scheme's evolution, demonstrating the potential for contributions on this site in this manner.

D. The scale of the site enables the potential for pooled contributions where necessary.

Please note more information may be found within the site's draft Section 106 heads of terms and within the Planning Statement.

Policy ANP 26 – Contributions from developers of new housing to fund additional education facilities

As part of delivering a socially sustainable development the site offers the opportunity for significant education contributions to help Armthorpe respond to its need for more school places. More information may be found within the site's Sustainability Statement.

Policy ANP 31 – Public Open Space on housing

The development of Grange Farm will open up this area of land for public enjoyment and create a link in the linear green infrastructure of Doncaster. More information may be found within the site's landscape strategy and Design and Access Statement.

Policy ANP 32 – Parks and Open Spaces

This site offers the opportunity for considerable levels of investment in existing parks and open spaces included Shaw Wood, enhancing its offer as a community resource. More information may be found within the Planning Statement.

Policy ANP 33 – Sustainable Urban Drainage

The scheme provides Sustainable Urban Drainage measures to alleviate surface water drainage. More information may be found within the site's Flood Risk Assessment and Drainage Strategy.

Policy ANP 34 – Definition of Green Wedge

The proposals have treated the distinction between Armthorpe and

<p>Edenthorpe with the upmost care. The current scheme incorporates an extensive green wedge buffer (some 150m in width) to the east of the site in order to maintain a clear distinction Armthorpe and Edenthorpe in accordance with policy CS17 of the adopted Core Strategy and in particular adopted 'Map 9' which shows the location for green wedge proposals.</p> <p>The project has been developed in close consultation with DMBC, who advised that Policy CS17 confirms that the identification of an area as being within a Green Wedge would not in itself exempt it from development. This is supported by a technical evidence base which demonstrates the position of the green wedge. More information may be found within the letter to Armthorpe from WYG dated 15th February 2013.</p> <p><u>Policy ANP 35 – Visual Connections with the Countryside</u></p> <p>As a gateway site, the proposed scheme capitalises on visual sightlines via improved landscaping corridors leading to a smooth integration with the surrounding countryside. The scheme's impact has been tested through a Landscape and Visual Assessment prepared by TPM landscape which confirms that the development would not have a significant adverse effect on the character of the surrounding landscape. This is further supported through DMBC Landscape assessments and Green Wedge studies. More information may be found within the Landscape and Visual Impact Assessment.</p>		
<p><b>MRS. P. CHEETHAM OF O &amp; H PROPERTIES LTD.</b></p> <p>O&amp;H Properties Ltd (O&amp;H) are the freehold owners of the land to the west of Hatfield Lane in Armthorpe. O&amp;H work to secure outline planning permission on their land and then take responsibility for setting the design framework and delivering the infrastructure before passing the land on to house-builders. We are grateful for the opportunity to comment of the provisional, pre-regulation draft of the Armthorpe Neighbourhood Development Plan.</p>		

<p>O&amp;H are pleased that Armthorpe Parish Council have recognised that by allocating the land to the north of Armthorpe they will be able to secure a permanent green edge to the village. This is clearly a key priority for the local community and it is important that suitable locations for growth are identified that enable vital green infrastructure to be secured. Land to the west of Hatfield Lane is ideally positioned to facilitate the delivery of the green wedge and ensure that it is maintained in perpetuity.</p> <p>We have secured planning permissions for similar sized, mixed-use village extensions throughout Bedfordshire, Buckinghamshire and Essex and welcome the opportunity to bring our experience as a master developer to this scheme. On a number of our other schemes we have been successful in delivering permanent green edges to settlements whether in the form of a country park, nature reserve or green wedge. O&amp;H are committed to bringing forward a planning application for the site once the Neighbourhood Plan is made and the allocation confirmed.</p> <p>We are keen that your Neighbourhood Plan progresses smoothly through publication and examination so that an application can be made and homes delivered within the early stages of the plan period. In this context, we offer the following comments for your consideration.</p> <table border="0"> <thead> <tr> <th data-bbox="188 1139 315 1166"><b>POLICY</b></th> <th data-bbox="383 1139 546 1166"><b>COMMENT</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="188 1182 277 1209"><b>ANP1</b></td> <td data-bbox="383 1182 1155 1342">O&amp;H wholly support the allocation of 'West of Hatfield Lane' (Site 2) and consider that this location for accommodating growth is in accordance with the other priorities that are set out in the Neighbourhood Plan.</td> </tr> </tbody> </table>	<b>POLICY</b>	<b>COMMENT</b>	<b>ANP1</b>	O&H wholly support the allocation of 'West of Hatfield Lane' (Site 2) and consider that this location for accommodating growth is in accordance with the other priorities that are set out in the Neighbourhood Plan.	<p>ANP 1 The Steering Group welcomes the support of O &amp; H for the allocation of land to the west of Hatfield Lane (S2).</p>	<p>The Parish Council welcomes the support of O &amp; H for allocating land to the west of Hatfield Lane. <u>Action: No</u></p>
<b>POLICY</b>	<b>COMMENT</b>					
<b>ANP1</b>	O&H wholly support the allocation of 'West of Hatfield Lane' (Site 2) and consider that this location for accommodating growth is in accordance with the other priorities that are set out in the Neighbourhood Plan.					

<p><b>ANP2</b></p>	<p>O&amp;H support the principles enshrined in Policy ANP2 but are concerned that the paragraph that follows the policy could be seen as conflicting with the proposed land use strategy. We propose the following alternative wording:  <b>It is important that new and existing residents feel part of the same community. New development should not be perceived as a separate place and should be of a size and character that avoids dominating the local area.</b></p>	<p><u>ANP 2:</u> With regard to O &amp; H’s comment on ANP2, their suggested alternative wording has been accepted by the Steering Group and will be recommended to the PC in preparing the pre-submission Draft ANP.</p>	<p><u>change required</u>  The Parish Council agrees with O &amp; H’s suggested alternative wording.  <u>Action: the wording of ANP2 to be amended in preparing the Pre-Submission Draft ANP</u></p>
<p><b>ANP5</b></p>	<p>O&amp;H supports the principles of Policy APN5 and recognises the need to encourage sustainable construction. However, the requirement to achieve code 4 for sustainable homes is contrary to the Doncaster Core Strategy objective. It should be replaced with a reference to the Doncaster Core Strategy policies and current building regulations to ensure the soundness of the Neighbourhood Plan.</p>	<p><u>ANP5:</u> The Steering Group accepts O &amp; H’s suggestion that reference to Code 4 for sustainable homes should be replaced with a wording relating to Doncaster MBC’s Core Strategy Policies and current building regulations.</p>	<p>The Parish Council accepts O &amp; H’s suggestion regarding Code 4 for sustainable homes.  Action: ANP5 to be amended in line with DMBC Core Strategy and current building regulations.</p>
<p><b>ANP10 &amp; 11</b></p>	<p>O&amp;H are concerned that point 2 on both policies could be read to apply to all levels of education being provided for on-site. The reality is that it will probably be necessary to accommodate primary provision on one of the sites to the north of Armthorpe but that it is too early to determine which site. Point 2 also fails to allow for financial contributions from the other developer. It is highly unlikely that secondary school provision will be provided on site but, again, the policy does not allow for financial contributions to be made to upgrade existing</p>	<p><u>ANP 10 and 11:</u> O &amp; H’s suggestion regarding an amendment to the 2 policies to allow for financial “contributions” as an alternative to developers providing education facilities on site, is accepted by the Steering Group.</p>	<p>The Parish Council accepts O &amp; H’s suggestion about an amendment to ANP 10 and 11 to allow for financial contributions.  <u>Action: ANP 10 and 11 to be amended to allow for financial contributions.</u></p>

<p>secondary provision within Armthorpe. We propose the following alternative wording:</p> <p>2. Education facilities <b>or contributions</b> sufficient to serve the demographic profile of the housing on site;”</p> <p><b>ANP34</b> O&amp;H are committed to providing a Green Wedge to the north of their site thereby establishing a permanent edge to the village. We look forward to on-going discussion with Armthorpe Parish Council over this matter to ensure that, when fixed, the extent of the Green Wedge is fit for purpose.</p> <p><b>App.3</b> O&amp;H support the general distribution of land uses that are shown on the plan for Site 2. However, the plan is taken to a level of detail that is not normally necessary for a development plan and we consider that it is too soon to fix where the access and crossing points will be or where the footpaths will run through the Green Wedge. The status of these plans needs to be clarified by reference to the fact that they are for illustrative purposes only. O&amp;H will be undertaking a series of technical assessments and further consultation that will inform the layout of the scheme.</p> <p>I trust that these comments are helpful as you refine your plan but please make contact if I can provide any clarification. I look forward to hearing from you regarding the next stage of the Neighbourhood Plan.</p>	<p><u>ANP34</u>: The Steering Group welcomes the commitment of O &amp; H to the principle of a green wedge and accepts their suggestion about on going discussions with the PC about the green wedge.</p> <p><u>APP3</u>: The PC notes O &amp; H’s view that the level of detail shown on the plan for Site 2 is not normally necessary at this stage in plan preparation. However other planning authorities have included indicative layouts at this stage, sometimes as part of a planning brief. Indeed, the Steering Group has agreed on the basis of a representation made by O &amp; H that the layout is merely illustrative and has indicated this in both ANP 10 and ANP11.</p>	<p>The Parish Council accepts O &amp; H’s suggestion about on-going discussions concerning the Green Wedge.</p> <p>The Parish Council accepts that the level of detail shown on site 2 is too great. <u>The wording of APP3/ANP10/ANP 11 be amended as appropriate.</u></p>
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<p><b>MR. J. ADAMS, DELOITTE LLP FOR CEMEX</b></p> <p>We write on behalf of our client CEMEX UK Ltd, to provide representations on the Draft Armthorpe Neighbourhood Development Plan Document. CEMEX wishes to ensure that the emerging policies within Armthorpe, as part of the Doncaster Metropolitan area, are the most appropriate in all circumstances, that they are founded on a robust and credible evidence base and are reasonably flexible to enable the plan to deal with changing circumstances and comply with National Planning Policy.</p> <p>Nationally, CEMEX owns a number of strategic sites, which are either due to, or have already ceased being in operational use. In accordance with National Planning Policy, CEMEX is seeking to promote these sites for alternative uses.</p> <p><b>CEMEX, Armthorpe</b></p> <p>Deloitte is instructed by CEMEX to advise on planning related matters in respect of its national assets. Within the Doncaster Metropolitan area, CEMEX owns one site, the extent of which is shown on the attached site plan. The site falls within the area covered by the draft Armthorpe Neighbourhood Development Plan and the address of the site is as follows:</p> <p><u>CEMEX Armthorpe</u> Holme Wood Lane Armthorpe</p> <p>The area under CEMEX's ownership is located approximately 1km to the east of Armthorpe village centre, directly to the east of Junction 4 of the M18. The site is currently undeveloped. The surrounding land to the north of the CEMEX site is an operational quarry.</p> <p><b>Countryside Policy Protection Area Designation</b></p> <p>CEMEX note that the Armthorpe site is designated as being part of the Countryside Policy Protection Area. Adopted 2011 Core Strategy Policy CS3: <i>Countryside</i> states that the countryside in the east of the Borough will continue to be protected through a Countryside</p>	<p>The PC notes the comment that the CEMEX land be allocated for alternative development uses. However, the site is within flood zone 3 and liable to flooding whereas alternative sites are not. In addition, the alternatives are a better fit with the criteria set out in the DMBC Local Development Framework Core Strategy and the draft Sites and Policies DPD and other evidence based material.</p>	<p>The Parish Council does not agree with the Deloitte suggestion that the CEMEX land be allocated for alternative development use for the reasons set out in the Council's response. Nor does the Council agree that the designation as countryside policy protection area should be altered to land for employment uses. <u>No action to be taken, therefore, by the Parish Council.</u></p>
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Protection Policy Area and that new development will be resisted, however identifying the CEMEX site for employment would increase the ability of the plan to accommodate occupier requirements and deliver economic growth. This accords with the objectives of the NPPF and CEMEX therefore considers there to be sound planning policy reasons as to why the site should now be allocated for alternative uses.

*Suitability for Employment Uses*

The CEMEX site is located directly adjacent to Junction 4 of the M18, making the site highly accessible and suitable for logistics or distribution purposes. The area directly to the west of Junction 4, opposite the CEMEX site, is already developed for employment uses.

The development of this land would provide jobs for local people, and in doing so would assist with the promotion of sustainable economic growth in accordance with the NPPF.

Development of the site for logistics and distribution purposes could be designed to ensure that it would not detrimentally impact the local area. Any future development would comply with landscaping requirements in order to screen the development. The site is not in close proximity to any existing or proposed residential areas, thereby minimising the potential to cause detriment to local amenity. CEMEX therefore believe that the site is viable for B8 uses.

**Conclusion**

In conclusion, CEMEX supports an approach of removing the Countryside Policy Protection Area designation and designate the land for employment uses. CEMEX encourages the Council to incorporate more flexibility into the emerging plan and acknowledge the benefits that the development of this land would deliver, while causing very few negative impacts. CEMEX therefore urges the council to re-allocate the site as a Major New Employment Site under draft neighbourhood policy ANP 12.



<p>We welcome the opportunity to meet to discuss any aspect of these representations with you and please do not hesitate to contact me if you require any further information regarding this matter.</p> <p>CEMEX is pleased to have the opportunity to comment on the emerging development brief, and requests that CEMEX continues to be updated on the programme of future planning documents. Should you have any queries on this correspondence, please contact Michael Bottomley on 0207 303 5636.</p>		
<p><b>MR. I. GRIFFIN OF MLA PLANNING CONSULTANTS ON BEHALF OF MR. P. LODGE</b></p> <p>Please find set out below a representation on behalf of Philip Lodge, landowner at Nutwell South in response to the draft Neighbourhood Plan. As detailed in our email exchange, to which you replied on the 19<sup>th</sup> August following your return from holiday, we do not consider that there is sufficient detail in the draft Plan to enable us to provide substantive comment. I therefore make the following general points:</p> <ol style="list-style-type: none"> <li>1. The final page of the draft plan indicates that additional information is available. You have subsequently advised that this information is not for release during this informal consultation exercise. I therefore need to caveat my comments in that they are subject to the sight of this critical information.</li> <li>2. There is little detail to comment on since none of the sites which have not been identified as an allocation are referenced at all within the document. In addition, there is no analysis of why the sites that have been identified were selected.</li> <li>3. Although I appreciate an informal consultation period is over and above the statutory requirement, a small window within August is never the most appropriate time to undertake an exercise of this nature. I am sure the Parish Council would have made this point in the event it had been a situation where they were the stakeholder.</li> </ol> <p>Without any detail behind the draft Plan, this highlights two particular</p>	<p>The PC notes MLA's consultation response dated 27 August 2013. Further information will be available during the formal consultation on the pre-submission draft of the ANP. The principal sites allocated for development, Sites 1 and 2, and the Major Employment Site are clearly depicted within the Pre-Regulation Draft ANP. In addition the DMBC Local Development Framework Core Strategy and the Sites and Policies Draft DPD and the ANP Issues and Options Report contain an explanation as to how site selection has been approached for both employment and residential development. The comment about the informal consultation on the Pre-Regulation ANP draft recognises that the consultation is over and above the statutory requirement but goes on to complain that August is not a good month for such an exercise. While</p>	<p>The Parish Council agrees that more information will be available during the Pre-Submission Draft Consultation of the ANP. Regarding the concern about consulting in August, the Parish Council would point out that the Pre-Submission Consultation presents another opportunity for representations to be made by persons affected by the Draft ANP. The Parish Council also disagrees with the statement that there is no published detail behind the Draft ANP. Nor</p>

<p>risks; firstly the evidence base for the production of the Neighbourhood Plan as a statutory planning document whether this be challenged during Inspection or at any point through the Courts. Secondly, if this document is the one to be presented at the referendum, it shows no option appraisal or thought process by which local residents can make an informed decision. It is therefore open to criticism as a fait accompli.</p> <p>Since there is little content on which to assess the proposed allocated sites, I raise the below points in no particular order:</p> <ol style="list-style-type: none"> <li>1. There is no environmental assessment of the individual environmental impacts or the cumulative environmental impacts of the proposed sites. The 2011 Census showed 6,108 dwellings in Armthorpe, therefore a proposed 780 additional units is a significant increase, the impacts of which need to be assessed.</li> <li>2. There is no reference to earlier work such as the Village Masterplan, which was produced following extensive consultation in Summer 2010. Citing just one example; this document states: <p><i>“the need for increased traffic levels to avoid the ‘Heart of Armthorpe’ is an absolute necessity. This could be achieved via the option to provide a by-pass to link Cantley with the M18 and A630, another to link to Doncaster via Leger Way and a ring road linking Nutwell Lane to Armthorpe Road or Doncaster Road, which must be considered when further developments are discussed.”</i></p> <p>It would appear that no consideration has been given to these highways solutions as part of the Draft Plan.</p> </li> <li>3. There is a lack of consistency in the approach to the Draft Plan and recent consultation responses for planning applications. Land at the Lings off West Moor Link has been identified as a</li> </ol>	<p>that may be so, the Pre-Regulation consultation will be followed by the statutory six-week consultation on the pre-submission draft of the ANP. Looking beyond the pre-submission draft stage to examination, the examiner is hardly likely to cavil with an extra period of consultation! The comment regarding an environmental assessment of the proposed sites is being addressed by DMBC who have been asked for a scoping opinion about such an assessment.</p> <p>The Village Master Plan is not a statutory document and there is no requirement to refer to it in the ANP. However, on page 6 of the ANP Issues Report, January 2013, it says, “the planning of Armthorpe is not a new exercise and this report is based on the Unitary Development Plan, earlier community profiles and the Armthorpe Master Plan from June 2010.” MLA’s comments go on to refer to new highways as a means of addressing the traffic congestion in Armthorpe. While the Parish Council accepts there is a problem of traffic congestion in Armthorpe, there are a number of possible solutions, apart from new highways, and these should be addressed in TIA’s accompanying</p>	<p>does the Council accept that the Armthorpe Master Plan should pre-determine the ANP. <u>No action is therefore proposed by the Council in response to most of MLA’s comments.</u></p>
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<p>draft housing allocation, despite a strong objection from the Parish Council when the planning application was submitted (and again at appeal). This included no less than 10 reasons for the objection including non compliance with the Village Masterplan, settlement coalescence, no major benefits to the Village, and highways concerns. It isn't clear how these points have been addressed through the proposed allocation in the draft plan. This does not include the huge number of letters of objection from members of the public.</p> <p>In summary, there is no published detail behind the draft Plan and as such little to comment on. This needs to be published for full scrutiny and only at that point can a full and reasoned assessment take place.</p>	<p>planning applications for residential and other development. Regarding lack of consistency in the approach to the Draft Pre-Regulation ANP as opposed to responses to planning applications, it is a matter for the PC to come to a view about development proposals, always bearing in mind the need for conformity with the DMBC Local Development Framework Core Strategy and the draft Sites and Policies DPD. There is, of course, no requirement to conform to the Armthorpe Master Plan or any other non-statutory document. Finally, the Parish Council cannot accept there is no published detail behind the draft NP; quite the reverse, there is a lot of detail, already published, bearing in mind the context and methodology provided by the DMBC Local Development Framework Core Strategy and the Draft Sites and Policies DPD.</p>	
<p><b><u>SPORT ENGLAND</u></b> Thank you for consulting Sport England on the above Neighbourhood Plan. Planning Policy in the <b>National Planning Policy Framework</b> identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically</p>	<p>The Parish Council notes Sport England's view that National Policy for Sport should comply with paras. 73 and 74. The Council also agrees that local plan policy should be underpinned by robust and up-to-date assessments and strategies for indoor and outdoor sports delivery.</p>	<p>The Parish Council agrees with the representations made by Sport England. <u>No action by the Parish Council is therefore necessary</u></p>

<p>active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.</p> <p>It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England’s role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, ‘<b>Playing Fields Policy – A Sporting Future for the Playing Fields of England</b>’.</p> <p><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/">http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/</a></p> <p>Sport England provides guidance on developing policy for sport and further information can be found following the link below (although please be aware that this is in the process of being updated to reflect revised planning guidance):</p> <p><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/">http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</a></p> <p>Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood Plan reflects the</p>	<p>The Council also notes the reference to the community infrastructure levied and the possibility of using it to improve sports’ provision.</p>	
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<p>recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations.</p> <p><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</a></p> <p>If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and designed in accordance with our design guidance notes.</p> <p><a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a>If you need any further advice please do not hesitate to contact Sport England using the contact details below.</p>		
<p><b>McATEER ASSOCIATES/LAZARUS GROUP</b></p> <p>I write on behalf of my clients, the Lazarus Group, who have land interests in Armthorpe, in respect of the above draft plan. As you will be aware, my clients are supporters of the Parish Council in their objective of ensuring that development in Armthorpe is at the correct level for the town and in the right location, and have sought to assist you in your decision making whenever possible. For this reason they are pleased to have a further opportunity to make submissions to the Parish Council in advance of the formal consultation process of the Neighbourhood Plan.</p> <p>The Lazarus Group support the Parish Council's decision to direct development to the north of Armthorpe, not just because it is where their land interest lie, but also because they firmly believe that it is the most appropriate location for the development required to maintain the growth and prosperity of the town whilst respecting its character and setting. The Lazarus Group therefore support the allocation of the land south of West Moor Link and east of Hatfield Lane for a mixed development of housing and employment.</p>	<p>The PC welcomes the support of the Lazarus Group regarding the level of development which the Pre-Regulation Draft ANP proposes in Armthorpe, bearing in mind, of course, that the scale of development is set in the DMBC Local Development Framework Core Strategy with which the ANP must comply.</p> <p>The PC also welcomes the Lazarus Group's support for development to the north of Armthorpe and in particular south of Westmoor Link and east of Hatfield Lane for a mix of housing and employment. The PC notes Lazarus Group's concern that only B1 and B2 uses and not B8 are to be allowed on the Major Employment Site east of Hatfield Lane and south of Westmoor link.</p>	<p>The PC welcomes Lazarus Group's support for the level and distribution of development in the Pre-Regulation Draft ANP.</p> <p>Regarding B1 and B2 uses the PC does not agree that B8 uses should be encouraged as well. <u>No change is necessary.</u></p>

However, whilst the Lazarus Group support the principle of the two allocations, they do have a number of concerns and queries over the detail of the policies which seek to control the form and location of the development.

The Lazarus Group are aware that, whilst Neighbourhood Plans are intended to increase the involvement of the public in development planning, any Neighbourhood Plan is required to be in accordance with national planning policy, as set out in the National Planning Policy Framework and any strategic plan covering the locality in this case the adopted Doncaster Core Strategy. My clients are therefore concerned that the Neighbourhood Plan appears to be departing from this requirement on two major issues.

Firstly, a large part of the land south of West Moor Link and east of Hatfield Lane is identified as a 'Broad Location' for a Major Employment Site and the explanation to Policy CS5 states in such areas *"to provide flexibility and avoid stifling investment, it is envisaged that in most cases the policies will avoid prescribing specific employment uses and sectors on the sites."* Lazarus are therefore concerned that whilst the land is allocated as a "Major Employment Site" under Policy ANP12, the policy states that only B1 b/c and B2 uses will be permitted. As the Parish Council will be aware when this site was considered, as part of the wider area in the appeal, the Secretary of State accepted that the site was ideally located for a B8 use. Lazarus would therefore request the Parish Council to reconsider their proposals, especially as national policy and law allows the change of use from B1/B2 to B8 without the need for planning permission.

Secondly, the Lazarus Group are concerned that the Neighbourhood

However, the PC wishes to promote B1 and B2 uses to encourage a more diverse economic base rather than further logistics and distribution firms, which are already prolific at the Westmoor Park site. Logistics and distribution businesses do not necessarily employ local labour and the jobs they do offer are often not well paid either.

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

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

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

<p>Plan Policy ANP34 appears to be contrary to the Core Strategy CS17. The Core Strategy is clear about the role of Green Wedges and Doncaster Council has carried out a number of studies to determine where they should be located. The Core Strategy makes it clear that the Green Wedges will be used to protect strategic rural gaps between settlements and that in the east of the borough the strategic rural gaps include that between Armthorpe and Edenthorpe. It is respectfully submitted that to require a Green Wedge on the land south of West Moor Link and east of Hatfield Lane cannot be regarded as fulfilling the stated purpose. Lazarus would therefore request that you reconsider your approach, especially as the need for a Green Wedge was fully debated in the appeal and the Secretary of State concluded a 20m landscaped area south of West Moor Link was sufficient to protect the character of the countryside to the north.</p> <p>Turning now to the way in which the Neighbourhood Plan deals with the allocations for the land controlled by the Lazarus Group, my clients have a number of concerns with both the policies and the Proposals Map.</p> <p>The Lazarus Group have no objection to their site referred to as The Lings, being allocated to deliver between 350 and 400 dwellings as required by Policy ANP10. However, they are concerned that if any weight is to be given to the Proposals Map at Appendix 2, then the only way in which the site could deliver the 350 – 400 dwellings would be to develop at a very high density and certainly at one higher than we have understood both the Parish Council and local residents to require. Lazarus would therefore seek the opportunity to discuss the requirements of Policy ANP10 at this time before the formal consultations take place. Lazarus believe that by working with the Parish Council the site can deliver the type of development required</p>	<p>necessary before final boundaries are confirmed.</p> <p>Regarding the Major Employment Site, Lazarus Group queries the apparent allocation of an existing local employment area as well as the undeveloped land. In response, however, the PC regards it as important to include the existing local employment area, as it is a mixture of developed, partially developed and undeveloped sites.</p>	
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<p>to enhance this approach into Armthorpe.</p> <p>The Lazarus Group also support the allocation of their land south of West Moor Link as a Major Employment Site, subject to the concerns expressed above. However, they do not fully understand the Proposals Map and the extent of the allocation shown on it. The Proposals Map appears to allocate an existing local employment area, which has a multitude of ownerships, as part of the Major Employment Site. My clients are unsure as to why this proposal is being put forward when their land has already been accepted by the Secretary of State as suitable and able to be delivered with an appropriate access onto West Moor Link. Again the Lazarus Group would wish to discuss the proposed allocation with the Parish Council as they believe the objectives of the Neighbourhood Plan can be achieved in a much more satisfactory manner and would be pleased to work with the Parish Council to ensure they are delivered. It is hoped that the Parish Council accept that the Lazarus Group want to continue to work with them to achieve the development required by the Neighbourhood Plan in a manner which will enhance the vitality and character of Armthorpe. They would therefore request a meeting with the Parish Council, or its representatives as soon as possible to allow the matter raised above to be discussed.</p> <p>We hope that this information is of assistance to you at this time, and look forward to receiving your response at your earliest convenience.</p>		
<p><b><u>ANDREW ROLLINSON/RTTP HOLDINGS</u></b></p> <p>We are aware that there will be a formal pre-submission consultation stage later in the process and we will be making representations at that stage.</p> <p>For now though we wish to make the following comments on the draft</p>	<p>The PC's response to the submissions made on behalf of RTTP Holdings, is as follows:  <u>Traffic Congestion</u>  RTTP Holdings attach much weight to the 2010 Armthorpe Master Plan. However, the Master Plan has no</p>	<p>The PC does not agree with the RTTP Holdings about the weight to be attached to the 2010 Armthorpe Master Plan. <u>No change is</u></p>



plan published on 5<sup>th</sup> August:-

Traffic Congestion

- On the matter of congestion the 2010 Armthorpe Masterplan highlighted that *traffic congestion in Armthorpe, is already a very real problem.....the fear of gridlock through the centre of Armthorpe is one of the major concerns of all residents. To help mitigate this all new developments should be able to access roads that circumnavigate the 'Heart of Armthorpe'.*
- With regard to a 'By-Pass/ Ring Road' the Masterplan noted that the *planning department and developers at the planning stage must consider this proposal to ensure provision of a by-pass / by-passes.*
- Whilst the two proposed housing allocations (The Lings, West Moor Link Road and West of Hatfield Lane) would have access to the M18 and Doncaster via the A 630 there is nothing within the draft plan which would facilitate the provision of a relief road to ameliorate the existing situation which, as noted above, *is already a very real problem.* In this regard the draft plan fails to address the legitimate concerns of Armthorpe's residents.
- Allocation of the wider area of land to the South of Armthorpe (as shown on the enclosed Relief Road sketch) would facilitate the provision of a single carriageway relief road similar to that which has recently been opened between the B & Q and Tesco Extra stores at Balby.
- There is no explanation as to why the previous commitment to the provision of a relief road seems to have been completely abandoned in the draft plan. The plan fails to address what has previously been regarded as an essential element of the future planning of Armthorpe and in this regard is considered to not be *positively prepared* and, therefore, not sound.

statutory significance and the PC is not required to take it into account. Having said that, page 6 of the ANP Issues Report, January 2013, says, "the planning of Armthorpe is not a new exercise and this report is based on the Unitary Development Plan, earlier community profiles and the Armthorpe Master Plan from June 2010". The PC accepts that there are problems of traffic congestion, especially at peak periods. These problems will be addressed in the TIA's accompanying planning application, particularly in connection with Major Employment Site and Sites 1 and 2 The Links, West Moor Link Road and East of Hatfield Lane. The TIA's will address a number of measures to ease existing congestion and increased traffic from the new developments. The measures will include traffic management / junction improvements / improved public transport / and increased cycling and walking provision. RTTP Holdings accept that two large housing allocations, The Lings, West Moor Link Road and off Hatfield Lane would have access to the M18 and Doncaster via the A630. However, they argue the

therefore necessary by the PC

The Parish Council agrees that there are problems of traffic congestion; these will be addressed at the planning application stage. However, no change is therefore necessary by the PC.

<p><u>Housing Allocations</u></p> <ul style="list-style-type: none"> <li>• The adopted Core Strategy requires the provision of between 643 and 923 new homes in Armthorpe. The two proposed housing allocations are envisaged to provide between 700 and 800 new homes.</li> <li>• The National Planning Policy Framework (NPPF) seeks a significant boost in the supply of housing and the delivery of a wide choice of high quality homes.</li> <li>• By failing to allocate sufficient housing land to meet the higher figure of 923 new homes it is considered that the plan will not ensure sufficient choice and competition in the market for land and will not prove adequately effective.</li> <li>• There is no compelling evidence within the draft plan that windfall sites have consistently become available in the area and that they will continue to provide a reliable source of supply.</li> <li>• The plan is considered to be unsound with regard to housing land supply and illogical given the comments within proposed policy ANP2 that <i>dispersing new housing development across a range of sites will help ensure that these sites are of a size and character that avoids dominating the local area.</i></li> </ul> <p><u>Barton Lane</u></p> <ul style="list-style-type: none"> <li>• Proposed policy ANP4 notes that <i>the site known as Barton Lane and identified on the proposals map as Residential Policy Area has the potential for approximately 185 dwellings (and) is encouraged to come forward for residential development.</i></li> <li>• The commentary of this proposed policy refers to a disparate pattern of ownerships yet evidence has already been provided to the Steering Group of the land assembly necessary to facilitate the development of the land further to the south and</li> </ul>	<p>failure to allow for a relief road to the south of Armthorpe means the plan does not address Armthorpe's residents' concerns.</p> <p>The PC does not accept this argument; as already mentioned above, there are many different measures, which TIA's could identify to address existing and future traffic congestion.</p> <p>Regarding the Relief Road sketch, there is no necessity for further developments in addition to Barton Lane and the two Sites 1 and 2 and the Major Employment Site adjacent to the Westmoor Link.</p> <p>The RTTP submission also says that because the Relief Road around the south of Armthorpe is not put forward in the ANP Pre-Regulation Draft, the Draft is "not positively prepared and therefore not sound". The PC cannot agree: the Pre-Regulation Draft conforms to the DMBC Core Strategy and the Draft Sites and Policies DPD, both of which propose substantial tracts of housing and employment development. It is obvious the Pre Regulation ANP Draft is sound and this is confirmed by DMBC's Policy Manager on behalf of DMBC.</p> <p><u>Housing Allocation</u></p> <p>The RTTP Holdings' submission</p>	<p>The PC does not agree that the ANP does not recognise residents' concern about congestion. Such concerns will be addressed through the planning application process. Also, the suggestion that the Armthorpe NP is 'unsound' is wrong in the Council's opinion as the plan clearly conforms with the DMBC Core Strategy and Sites and Policies DPD. Indeed, the DMBC Policy Manager (Planning) has confirmed that the Pre-Regulation ANP Draft does conform and is, therefore, sound. <u>No change is therefore, necessary by the PC.</u></p>
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<p>east along with the provision of a relief road to the south of Armthorpe).</p> <ul style="list-style-type: none"> <li>It is respectfully suggested that this proposed policy is not really a policy at all in so much as it does not allocate the land for housing and does not provide certainty. Furthermore, it relies on the relocation of existing businesses to provide sufficient land to meet the higher housing target and provide more competition in the market for housing land. Again, the draft plan is not considered to be effective and to be unsound.</li> </ul>	<p>accepts that the DMBC Core Strategy puts forward the provision of between 643 and 925 homes in Armthorpe and this is in line with the NPPF.</p> <p>The RTTP submission goes on to say because the ANP does not meet the highest figure of 923 there will be insufficient choice and competition in the market for land. The PC simply does not agree; the pit top development demonstrates that there is likely to be a strong market for housing development in Armthorpe.</p> <p>Regarding windfall sites, there have been a number of them over the years not least the pit top development. While that scale of windfall development is not likely to be repeated, it will not be necessary to any large degree bearing in mind the availability of Sites 1 and 2 during the plan period.</p> <p>RTTP maintain that the plan is unsound with regard to housing supply; this is simply not true as the ANP Draft conforms to the DMBC Core Strategy and Draft Sites and Policies DPD.</p> <p><u>Barton Lane</u></p> <p>RTTP Holdings criticises the policy ANP4 for identifying land at Barton Lane for housing because this</p>	<p>The Parish Council does not agree that because the Armthorpe NP does not meet highest figure of 923 dwellings, there will be insufficient choice and competition. <u>No change is necessary by the Parish Council.</u></p> <p>With regard to Barton Lane, the PC cannot accept that</p>
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	<p>proposal relies on relocating existing businesses to provide sufficient land to meet the higher housing target. For this reason RTTP consider the Draft ANP to be ineffective and therefore not sound. In response, the PC would point out that the Planning and Compensation Act 2004 provides the compulsory purchase powers to enable land if necessary to be assembled for development subsequently. The PC cannot accept therefore, that the Draft ANP is rendered unsound because of the need for land assembly.</p>	<p>Barton Lane is not appropriate for housing because it is in several business ownerships. The possibility of using CPO powers allows non-conforming uses to be acquired by planning authorities such as DMBC. <u>No change is necessary by the Parish Council.</u></p>
<p><b>MR. C. BROADWITH OF ENGLISH HERITAGE</b>  <b>Response Dated 31 January 2013</b>  Thank you for giving notice that the Armthorpe Parish Council have applied to Doncaster Council for designation of a Neighbourhood Plan Area under Part 2 of the Neighbourhood Planning (General) Regulations 2012.</p> <p>We consider that the planning and conservation team at Doncaster Metropolitan District Council are best placed to assist you in the development of your Neighbourhood Plan and, in particular, how the strategy might address the area's heritage assets. Consequently, we do not consider that there is a need for English Heritage to be involved in the development of the strategy for your area.</p> <p>We would also advise you to contact the staff at the South Yorkshire Archaeology Service, who look after the Historic Environment Record. They should be able to provide details of not only any</p>	<p>The Parish Council notes that English Heritage considers there is no need to get involved in the development of the strategy for the Armthorpe Area. The Council also notes the suggestion about contacting the South Yorkshire Archaeology Service who looks after the Historic Environment Record. English Heritage also refers to online resources about historically important buildings, archaeological remains and landscapes.</p>	<p>The Council welcomes the helpful suggestions about heritage information being available through the South Yorkshire Archaeological Service in addition to English Heritage's own document.</p> <p><u>No change is necessary by the Parish Council</u></p>

designated heritage assets but also locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway ([www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)). It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan.

English Heritage has produced a number of documents which your community might find helpful in helping to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. These can be found at:-

<http://www.english-heritage.org.uk/caring/get-involved/improving-your-neighbourhood/planning-opportunities/>

<http://www.english-heritage.org.uk/professional/advice/hpg/historicenvironment/neighbourhoodplanning/>

You may also find the advice in *“Planning for the Environment at the Neighbourhood Level”* useful. This has been produced by English Heritage, Natural England, the Environment Agency and the Forestry Commission. As well as giving ideas on how you might improve your local environment, it also contains some useful further sources of information. This can be downloaded from:

[http://www.ourneighbourhoodplanning.org.uk/news/2012/07/30/Planning\\_for\\_the\\_Environment\\_at\\_a\\_Neighbourhood\\_Level](http://www.ourneighbourhoodplanning.org.uk/news/2012/07/30/Planning_for_the_Environment_at_a_Neighbourhood_Level)

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Thank you.

**Further Response Dated 19th August 2013**

Thank you for consulting us in connection with the Armthorpe

<p>Neighbourhood Development Plan, under the Neighbourhood Planning (General) Regulations 2012.</p> <p>We do not wish to make additional comments on the Provisional Draft Plan, over and above the advice we gave in our letter of 31 January 2013, which we attach, for your information.</p> <p>If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.</p>		
<p><b>MR C. HARDIE OF THE HIGHWAYS AGENCY</b></p> <p>The Highways Agency has now reviewed the draft Armthorpe NDP as on your web-site as at 7th August 2013 and would make the following comments:</p> <p>The HA has no objection in principle to the New Housing or Major Employment site proposals. The principles of our response in our letter dated 30th January 2013 still apply.</p> <p>The new housing proposals suggest fewer houses than for the equivalent sites in the January 2013 consultation. Nevertheless, the developments will be sufficiently large individually to still require a full Transport Assessment in accordance with DfT standards. In particular, the HA would look for an assessment of the impacts on the Strategic Road Network (the M18) and suitable mitigations to be provided by the developer.</p> <p>Similarly, the Major Employment Sites are likely to have significant impacts on the M18 and possibly the M180, M62, M1.</p> <p>It is important to understand that the cost of mitigating impacts on the Strategic network should be considered when developing your land-use strategy. The Agency, will of course, be happy to work with your Council and developer partners to identify appropriate solutions in a</p>	<p>The Parish Council welcomes the statement that the Highways Agency has no objections to the new housing or major employment sites, in principle. The agency goes on to say that these developments will still require a full transport assessment which would, in particular, look at the impact on the strategic road network, particularly the motorways.</p>	<p>The Parish Council welcomes the support from the Highways Agency for the major housing and employment proposals in the ANP. <u>No change is necessary by the Parish Council</u></p>

<p>cost-effective manner.</p> <p>I would be happy to discuss any of the points raised in this e-mail if that would be considered helpful and please contact me should you need.</p>		
<p><b>MR. J. KING OF NATURAL ENGLAND</b></p> <p>Thank you for your consultation on the above dated 01/08/2013.</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 is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils of Neighbourhood Forums where they consider our interests would be affected by the proposals made. Natural England does not have the resources to get involved in all neighbourhood plans and will prioritise our detailed engagement to those plans that may impact on nationally protected nature conservation sites, and/or require an Strategic Environmental Assessment or Habitats Regulation Assessment.</p> <p><b>Natural England does not consider that this plan poses any likely or significant risk to nationally designated nature conservation sites and so does not wish to make specific comments on the neighbourhood plan.</b></p> <p>Regarding local wildlife sites – in accordance with paragraph 117 of the National Planning Policy Framework – the neighbourhood plan’s proposals map should identify locally designated wildlife sites, including the woodland wildlife site within the employment allocation</p>	<p>The Council notes that Natural England does not consider this plan to pose any likely or significant risk to nationally designated nature conservation sites and so does not wish to make specific comments on the ANP. The Parish Council welcomes the support by Natural England for the identification of locally designated wildlife sites.</p>	<p><u>The Parish Council agrees to amend the Proposals Map to show locally designated wildlife sites, including the wildlife site within the employment allocation, which extends Westmoor Park (this site has been preserved within the approved planning permission).</u></p>

<p>which extends Westmoor Park (this site has been preserved within the approved planning permission).</p> <p>The lack of detailed comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may make comments that will help the Parish/Town Council or Neighbourhood Forum to fully take account of the natural environment in the plan-making process.</p> <p>We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.</p> <p>For clarification of any points in this letter, please contact John King on 0300 060 4129. For any further consultations on your plan, please contact: <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a></p>		
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