



City of
Doncaster
Council

Doncaster Planning Policy

Rural Development
Supplementary Planning
Document
Consultation Statement
April 2024



1. Introduction

- 1.1. This document has been prepared in order to demonstrate how the Council has followed the requirements of the [Town and Country Planning \(Local Planning\) \(England\) Regulations \(2012\)](#) in preparing and adopting the Council's Rural Development Supplementary Planning Document (SPD).
- 1.2. SPDs were introduced as part of the Planning and Compulsory Purchase Act 2004. The [Planning Practice Guidance](#) is clear that an SPD needs to add further detail to policies in Local Plans and that they can be used to provide further guidance for development on particular issues. They are a material consideration for determining planning applications, albeit they do not form part of the development plan. SPD build on relevant [Local Plan Policies](#) which were adopted by the Council in September 2021.
- 1.3. The Rural Development SPD provides further guidance for applicants and developers on how planning applications can address and satisfy requirements set out in the following Local Plan Polices:
 - Policy 1: Settlement Hierarchy; Part 5 Countryside Policy Area & Part 6 Green Belt
 - Policy 8: Removal of Occupancy Conditions
 - Policy 11: Gypsies, Travellers and Travelling Show People
 - Policy 25: Development in the Countryside Policy Area.
- 1.4. The SPD also assists local interpretation of relevant [National Planning Policy Framework](#) policy including that related to rural development and for the Green Belt.

2. Consultation Regulations & Habitats Regulation Assessment / Strategic Environmental Assessment Screening

- 2.1. This consultation has been carried out in accordance with the [Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#) (as amended). In line with Regulation 12(a), before adopting a SPD, a Local Planning Authority must prepare a statement setting out who was consulted when preparing the SPD, a summary of the main issues raised and how these issues have been addressed. This document is the Consultation Statement for the adopted SPD as required by Regulation 12(a).
- 2.2. Regulation 12(b) requires that the documents and consultation statement are published for a minimum of 4 weeks and that they specify the date by which representations must be made and the address to which they must be sent.
- 2.3. Regulation 35 requires the documents must be made available to the public at the principal office of the Council and other places the Council consider appropriate as well as publishing on the Council's website.
- 2.4. The Government's national [Planning Practice Guidance](#) states "*SPDs do not require a sustainability appraisal but may in exceptional circumstances require a strategic environmental assessment if they are likely to have significant environmental effects that have not already been assessed during the preparation of the relevant strategic policies.*"
- 2.5. Every stage of the Doncaster Local Plan's preparation (from initial scoping through to Adoption) were subject to a comprehensive sustainability appraisal incorporating strategic

environmental assessment with a number of changes to policies made to address each individual report's recommendations. The Doncaster Local Plan [Habitats Regulation Assessment \(HRA\)](#) Submission Version (2020) and subsequent Addendum (2021), concluded that the policies in the Plan (either alone or in combination) would not impact on any of the European Sites either within, or in close proximity, to the City of Doncaster.

- 2.6. As set out above, the SPD provides further guidance and detail to the relevant adopted Local Plan policies, and does not result in any significantly different effects over and above those already considered and assessed through the preparation of the recently adopted Local Plan and the relevant policies (listed above) which are the strategic policies that the SPD 'hangs off'.

3. Consultation Details

- 3.1. Consultation on the draft SPD took place for a period of four weeks from Thursday 1 February 2024 to 5pm on Thursday 29 February 2024. Consultation was in line with the Council's [Statement of Community Involvement](#) and involved emailing all persons and organisations who had signed up to the Council's Planning Policy database.
- 3.2. The draft SPD and response form were made available on the Council's website and a hard copy was available to view during normal office hours at the Customer Service Desk at City of Doncaster Council's main office: Civic Office, Waterdale, Doncaster, DN1 3BU.
- 3.3. The consultation was also advertised in the Doncaster Free Press and on X (Twitter).
- 3.4. Consultation comments were invited by email to localplan@doncaster.gov.uk or by post via: Local Plans Team, Doncaster Council, Civic Office, Waterdale, Doncaster, DN1 3BU.

4. Who was Consulted?

- 4.1. In accordance with Regulation 12, interested parties, including everyone on the Planning Policy database, and those listed in Appendix A of the [Statement of Community Involvement](#), were notified of the consultation. This includes a variety of stakeholders, such as City of Doncaster Council elected members and officers within other departments, town and parish councils, residents, landowners, developers, statutory consultees and other local planning authorities.
- 4.2. At the close of the consultation, the Council had received responses from 11 organisations and individuals. 7 were from statutory consultees (Canal & River Trust; Coal Authority; Environment Agency; Highways England; Historic England; Natural England; and Sport England); 3 from landowners/ development site promoters; and 1 from a member of the public. 2 of the statutory consultee responses did not make any specific comment – so effectively a total of 9 responses were actually received.

5. What Were the Main Issues Raised During Consultation?

5.1 A number of issues were raised during consultation and these are discussed below.

5.2 [Appendix 1](#) sets out in more detail a summary of the issues that were raised and how they have been addressed; as well as a limited number of changes to the SPD where considered appropriate.

5.3 The main issues raised are as follows:

- The [Environment Agency](#) thought the SPG should include reference to other relevant Local Plan policies for flood risk management, biodiversity, waste and environmental management. *No amendments have been made to avoid unnecessary repetition of existing Local Plan policies.*
- The [Highways Agency](#) thought the SPD should be amended so that all scales of development recognise impacts on the strategic road network and for sustainability. *As these issues are covered via Local Plan Policy 13 no change is considered necessary.*
- [Historic Environment](#), whilst supporting various aspects of the SPD, thought that greater reference should be made to the historic environment, that further guidance is needed for enabling development. *Limited wording changes have been made in response.*
- [Natural England](#) didn't provide specific comments but generic advice that various issues under its remit should be covered. *No amendments have been made to avoid unnecessary repetition of existing Local Plan policies.*
- [Sport England](#) raised concern that the SPD may result in sports clubs, and existing and new playing fields/ outdoor sports sites, not being able to gain planning permission for certain ancillary facilities. *Limited wording changes have been made in response to clarify this need not be the case.*
- One [land promoter](#) / owner thought that additional guidance is needed on meeting the specific location of different economic sectors, as per NPPF paragraph 87, particularly for large scale strategic warehousing; and was concerned that that the Local Plan's Countryside Policy Area designation is too much of a development restraint tool and should allow for the above. *No amendments have been made as these matters can be considered by reading the Local Plan in conjunction with the NPPF and/or are better addressed via Local Plan review.*
- Another [land promoter](#) / owner suggested various amendments to aid clarity of the document through minor wording amendments but also sought to extend policy in Local Plan Policy 1 Part 5 to also include Green Belt as well as Countryside Policy Area. *Limited wording changes have been made in response to part of the comments made (whilst rejecting the suggested extension of Local Plan Policy 1 Part 5 policy to the Green Belt).*
- Another [land owner](#), promoting land for development (a site previously refused planning permission on Appeal) in Skellow, sought various amendments to the SPD and to certain Development Management working practices in Doncaster's Planning Service. *No amendments have been made for reasons set out in [Appendix 1](#).*
- A [member of the public](#) thought the SPD should address road safety, fly tipping and crime. *No amendments have been made to avoid repetition of coverage already made (where valid) in existing Local Plan policies.*

Appendix 1 – Summary of Consultation Responses and Changes Made to the SPD

Name / Organisation	Section / Paragraph	Comment Summary	CDC Response	SPD Amendments
<p>Blue Anchor Leisure (Agent: Peacock & Smith)</p>	<p>Section 3.5 (Policy 25, Part 4)</p>	<p>Comment is framed primarily to promote the needs of the storage and distribution sector, including that for major development associated with Doncaster’s motorway junctions.</p> <p>Para 86d of the NPPF indicates that planning policies should be flexible enough to accommodate needs not anticipated in the plan, to allow for new and flexible working practices and to enable a rapid response to changes in economic circumstances.</p> <p>Flexibility is needed to allow for strategic warehouse needs to maintain a sufficient supply of such land over the Local Plan period.</p> <p>Opinion given that the Local Plan’s use of Development Limits / designation of Countryside Policy Area is essentially “as a general development restraint tool rather than reflecting land that needs to be protected from development because of its landscape value or particular countryside character.”</p> <p>The SPD should require an assessment of the character of the location to determine its suitability for the proposed use. Under Criterion C) of Part 4 of Policy 25 the SPD should include text at Para 3.5.22 to reflect the policy at Para 87 of the NPPF that the specific locational requirements of different sectors will be recognised.</p>	<p>The Local Plan is read in conjunction with NPPF policy and was prepared (and found by Examination) to be consistent with it. The Local Plan itself includes significant flexibility and the Inspector concluded in his Report that there was no need to provide greater flexibility through identifying reserve sites or to include a policy to allow employment development on land in the countryside policy area in certain circumstances (para.203). NPPF 86b is Plan <u>making</u> policy and the SPD cannot be used to amend existing policy.</p> <p>Meeting the needs of Strategic Warehousing is best addressed by the Local Plan and is kept under review by plan monitoring (including the need for Local Plan review).</p> <p>The use of Development Limits is part of the Local Plan’s strategic approach for promoting development according to the Plan’s Settlement Hierarchy / Policy 1. It is not an inherently negative development restraint tool (as is being suggested) but a positive tool to direct development to the most sustainable locations whilst recognising the <i>intrinsic</i> character and beauty of the countryside.</p> <p>Policy 25, Part 4, is based upon implementing the NPPF’s policy on supporting a prosperous rural economy (given in NPPF paragraphs 88 and 89). This can be read in conjunction with NPPF paragraph 87 whereby individual decisions can take account of “the specific locational requirements of different sectors.”</p> <p>See response above. Policies 2 and 3 ensure sufficient land/sites have been identified to meet the needs of strategic warehousing. It is not the role of the SPD to, in effect, reconsider the suitability of any given area for designation as Countryside Policy Area (or indeed Green Belt) which could be implied by the comment.</p> <p>Any given application for development considered against Local Plan Policy 25 Part 4 will include an assessment of its impact upon countryside character and landscape, etc., through the various relevant policies of the Local Plan (including Policy 25 Part 4 C and D and those referred to in paragraph 2.2.6 of the SPD).</p>	<p>No amendments required</p> <p>No amendments required</p>
<p>Canal & River Trust</p>	<p>Not applicable</p>	<p>No comment to make.</p>	<p>Noted.</p>	<p>No amendments required.</p>
<p>Cawkwell, Paddy J</p>	<p>Not specified</p>	<p>The SPD should address road safety, fly tipping and crime.</p>	<p>To the extent these are relevant to planning applications, relevant policies have already been included in the Local Plan (e.g. highway safety via Policy 13: Promoting Sustainable Transport in New Developments; fly tipping / crime via Policy 47: Safe and Secure Places). No further detail specifically for rural development proposals is considered necessary in the SPD.</p>	<p>No amendments required.</p>

Name / Organisation	Section / Paragraph	Comment Summary	CDC Response	SPD Amendments
Coal Authority	Not applicable	No comment to make.	Noted.	No amendments required.
Environment Agency	Not specified	<p><u>Flood Risk Management</u>: There may have been an attempt to avoid duplication of policy wording and replicate content from other adopted/ proposed policy documents as recommended in national guidance. Nonetheless, the Environment Agency would have welcomed crucial reference to the Doncaster Strategic Flood Risk Assessment and relevant planning policies, such as – but not limited to – Local Plan Policies 56 and 57. Further, we would also have expected directive signposting to the adopted Flood Risk SPD that provides useful guidance to applicants and consultees.</p> <p><u>Biodiversity</u>: Welcome inclusion of reference to NPPF para 88 on supporting a prosperous rural economy and para 180 on need to contribute to and enhance natural and local environment. However, SPD should signpost to policy on blue-green infrastructure, ecological connectivity and the need for focused enhancement.</p> <p>Recognise there may a preference not to duplicate policy wording and replicate content in other adopted/ proposed policy documents, but nonetheless would have supported reference to relevant strategic biodiversity policies beyond Local Plan Policy 25 such as – but not limited to - Policies 26, 29, 30, 31 and 32. Moreover, Doncaster Council is in a strong position to also reference its BNG SPD that shapes how relevant development proposals in the countryside would be expected to deliver improvements through habitat creation or enhancement after firstly avoiding and then after mitigating harm. The Environment Agency would obviously be supportive if a precise signpost was applied to Section 3, paragraph 3.1.2 of the BNG SPD, as this would highlight to all applicants and consultees of the benefits from enhanced watercourses in providing connectivity for biodiversity.</p> <p><u>Waste</u>: Recognise the aim to deliver new waste management facilities as part of the strategic network in Doncaster and South Yorkshire. Further, the Environment Agency notes that the draft SPD has inserted signposting to the adopted Joint Waste Plan, should clarity be sought for non-allocated sites, including those that may be proposed in the countryside. Welcome the recognition of the outline of waste development types and acknowledge the Joint Waste Plan highlights the broad location types where proposals may be acceptable in principle. That said, in addition to flood prevention in Paragraph 3.5.27, the Agency would have preferred to see specific reference to a need for waste proposals to avoid negatively impacting on the health and wellbeing of rural communities, while protecting the natural environment including water quality. Subject to size and scale, there may also be a case to reflect waste management/ pollution prevention in the information needed for equestrian centres and other commercial enterprises as listed at Paragraph 3.9.26. The Environment Agency would particularly welcome</p>	<p>The Environment Agency is correct to assume there has been an attempt at brevity and avoidance of repetition of other policy documents. The Local Plan is to be read as a whole. It is not considered necessary to explicitly refer to the suggested policies which are fully addressed in the Local Plan and the dedicated Flood Risk SPD.</p> <p>Again, the Environment Agency is correct to assume there has been an attempt at brevity and avoidance of repetition of other policy documents. The Local Plan is to be read as a whole. It is not considered necessary to explicitly refer to the suggested policies which are fully addressed in the Local Plan and Biodiversity Net Gain SPD</p> <p>There has been an attempt at brevity and avoidance of repetition of other policy documents. The Local Plan is to be read as a whole. It is not considered necessary to explicitly refer to the suggested policies which are fully addressed in the Local Plan and the Joint Waste Plan.</p>	<p>No amendments required.</p> <p>No amendments required.</p> <p>No amendments required.</p>

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		<p>some revised signposting in the supporting text to Local Plan Policies 54 and 55, which would clearly highlight the need to balance proposals for non-allocated waste sites with other competing visions and policy aims.</p> <p><u>Environmental Management</u>: The water environment, which includes surface waters (rivers, streams, canals, lakes, wetlands, floodplains, and their riparian areas), as well as groundwaters, are an extremely important part of the natural environment. The conservation and enhancement of such environments is vital in creating a range of valuable and well connected habitats that support a healthy and diverse range of species. The Environment Agency welcomes the acknowledgement of and reference to those development proposals that must occur in specific rural locations, such as mineral workings, certain renewable energy projects and infrastructure/ engineering operations. We are concerned that insufficient balance has been applied in relevant chapters/ sections to clearly illustrate the main environmental challenges that may need to be overcome to successfully address statutory requirements. Again, we would prefer to see additional text at Paragraph 2.2.6 that clearly presents the wider environmental constraints that are applicable to the rural distinctiveness of Doncaster. Indeed, the Environment Agency would welcome specific text that reflects the important role of Local Plan Policies 54, 55, 56, 57, 58, 59, 60 and 61, while also the overall strategic objectives for Chapter 10</p>	<p>There has been an attempt at brevity and avoidance of repetition of other policy documents. The Local Plan is to be read as a whole. It is not considered necessary to explicitly refer to the suggested policies which are fully addressed in the Local Plan.</p>	<p>No amendments required.</p>
Highways England	Not specified	<p>The SPD should set out more clearly the need for even small scale development to be “highly tuned into the need for sustainability and transport above that of the single occupant vehicle”. The aggregated impact on the Strategic Road Network from dispersed development sites needs to be taken into account alongside the potential for any associated mitigation.</p>	<p>The concerns of the Highways Agency are appreciated and proposals will continue to be considered against Local Plan Policy 13 (Promoting Sustainable Transport in New Developments) included in the Local Plan, partly, to address this concern.</p> <p>In respect of proposals for local business and community needs (economic development) these will be considered mindful of NPPF paragraphs 88 and 89 on ‘supporting a prosperous rural economy’ including the policy that planning decisions in rural areas may have to be found ‘in locations that are not well served by public transport’ and ‘exploits any opportunities to make a location more sustainable (for example, by improving the scope for access on foot, by cycling or by public transport)’.</p> <p>No further detail specifically for rural development proposals is considered necessary in the SPD beyond that already included (in, for example, paragraph 3.2.25 concerning proposals for isolated dwellings and para 3.5.16 concerning tourism accommodation).</p>	<p>No amendments required.</p>
Historic England	General Comment	<p>The document is well structured, exploring and explaining key clauses within relevant Local Plan policy in an easy to follow and logical manner.</p>	<p>Support noted.</p>	<p>No amendments required.</p>

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	<p>Paragraph 3.2.6 (Policy 25, Part 1A)</p> <p>Paragraph 3.2.14 (Policy 25, Part 1B)</p> <p>Paragraph 3.2.17 (Policy 25, Part 1C).</p> <p>Paragraph 3.2.31 (Policy 25, Part 1F)</p> <p>Paragraph 3.4.12 (Policy 25, Part 3 Rural Exception Sites)</p> <p>Paragraph 3.4.18b (Policy 25, Part 3 Exception Sites for Community Led Developments)</p>	<p>Support the approach taken in requiring a conversion statement to be submitted with planning applications which sets out a description of the building to be converted and the proposed works to it.</p> <p>Welcome the emphasis on the original building remaining a clear, recognisable and key component of the final design. The degree to which this is necessary will of course depend on the characteristics and quality of the original building.</p> <p>Whilst we support the references provided to Local Plan policies 41, 44 and 46 in this paragraph, we would request that reference is also made to Policy 34. The historic environment context of development proposals in the countryside will be critical to understanding the character of the area which should be used to inform design. Whilst the local distinctiveness policy refers to development proposals needing to be informed by the history and context of a site generally it does not refer to the historic environment or heritage assets specifically.</p> <p>We support the consideration given, where necessary and appropriate, to restricting the curtilage (domestic or otherwise) and permitted development rights of converted buildings in the countryside.</p> <p>It should be noted that, as stated under paragraph 214 of the National Planning Policy Framework, enabling development is that 'which would otherwise conflict with planning policies but would secure the future conservation of a heritage asset'. As such, the local planning authority must assess whether the benefits of any proposal for enabling development clearly and demonstrably outweigh the disbenefits of departing from policy. Enabling development is therefore an exception to the rule and particular attention needs to be given to ensure that proposals are properly evidenced and carefully considered.</p> <p>Historic England has produced guidance on enabling development which could be referred to under this paragraph: Historic England Good Practice Advice in Planning: 4: Enabling Development and Heritage Assets</p> <p>We support the guidance set out in the bullet points to this paragraph.</p> <p>We welcome the reference made to the Local Heritage List.</p>	<p>Support noted.</p> <p>Whilst the Local Plan is to be read as a whole, it is agreed, in this instance, that additional reference to Policy 34 in this paragraph would be beneficial.</p> <p>Support noted.</p> <p>It is accepted that it would be beneficial for Paragraph 3.2.31 to refer to Historic England's guidance on enabling development.</p> <p>Support noted.</p> <p>Support noted.</p>	<p>No amendments required.</p> <p>Amend paragraph 3.2.14 to read: "Consideration of Part 1B (and C and D below) will also be informed by assessment against Local Plan Policy 34 (Valuing out Historic Environment), Policy 41 (Character and Local Distinctiveness); for residential proposals, Policy 44 (Residential Design); and for non-residential, Policy 46 (Design of Non-Residential, Commercial and Employment Developments).</p> <p>No amendments required.</p> <p>Insert additional sentence to end of Paragraph 3.2.31 to read: "Historic England have produced guidance on enabling development which can be used to inform relevant planning applications" with new footnote to read: "Historic England Good Practice Advice in Planning: 4: Enabling Development and Heritage Assets".</p> <p>No amendments required.</p> <p>No amendments required.</p>
Natural England	Not specified	No specific comments made but advises that the SPD considers the following issues: green infrastructure; biodiversity enhancement; landscape enhancement; other	The issues raised have been sufficiently addressed by various Local Plan policies. No further detailed	No amendments required.

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		design considerations; Strategic Environmental Assessment/Habitats Regulations Assessment.	<p>consideration specifically for rural development proposals is considered necessary.</p> <p>The Local Plan's preparation was subject to a comprehensive sustainability appraisal incorporating strategic environmental assessment with a number of changes to policies made to address each individual report's recommendations. The Doncaster Local Plan Habitats Regulation Assessment (HRA) Submission Version (2020) and subsequent Addendum (2021), concluded that the policies in the Plan (either alone or in combination) would not impact on any of the European Sites either within, or in close proximity, to the City of Doncaster.</p> <p>The SPD provides further guidance and detail to the relevant adopted Local Plan policies, and does not therefore result in any significantly different effects over and above those already considered and assessed through the preparation of the recently adopted Local Plan and the relevant policies (listed above) which are the strategic policies that the SPD 'hangs off'.</p>	
Newsholme Developments (Agent: Lichfields)	<p>Paragraph 3.1.2 (Box)</p> <p>Section 3.10</p> <p>Paragraph 4.4.46</p>	<p>It is noted that Local Plan Policy 25 'Development in the Countryside Policy Area' does not directly apply to proposals in the Green Belt but those in the Countryside Policy Area. However, paragraph 3.1.2 of the draft SPD states that whilst this is the case, "some of the principles apply" to development in the Green Belt. It is not clear within the draft SPD as to which "principles" the Council considers applicable and this would benefit from clarification.</p> <p>Section 3.10 of the draft SPD provides further guidance regarding the application of Local Plan Policy 1, Part 5 which relates to the 'Settlement Hierarchy – Countryside Policy Area'. It identifies that if the Council is unable to demonstrate a deliverable five-year housing land supply or it fails the Housing Delivery Test, then residential development will be supported in the Countryside Policy Area if all of the specified criteria is met. However, whilst this element of the policy relates to the Countryside Policy Area, paragraph 3.10.4 identifies that "in the Green Belt; adjacent to any 'Defined Village'; or in the Countryside Policy Area more widely, development would not be approved for this reason". It is unclear from the current drafting as to what "this reason" specifically relates to. This section of the text would benefit from further consideration and clarification; there may be instances where for example, very special circumstances exist that support the principle of development in Green Belt locations.</p> <p>Subheading 'NPPF Paragraph 154g: redevelopment of 'previously developed land'', acknowledges that paragraph</p>	<p>It is accepted the text in the Box following paragraph 3.1.2 could benefit from re-wording, so a change is proposed.</p> <p>It is agreed that reference to "for this reason" in paragraph 3.10.4 is not very clear.</p> <p>This is not intended to suggest or imply this policy could also apply to Green Belt locations (as has been so misinterpreted in this comment). The previous paragraph clearly states this would not apply to Green Belt. To extend this Policy 1, Part 5 policy to Green Belt, even if it were desirable, would effectively be unlawful as it is not the role of SPD to set planning policy which should only be set out in the Development Plan.</p> <p>It is therefore suggested the wording "for this reason" be deleted.</p> <p>The Council believes the current wording of Paragraph 4.4.46 is sufficiently clear and cannot suggest how it could</p>	<p>Amend the wording in the Box following paragraph 3.1.2 to read:</p> <p>* Policy 25 does not directly apply to proposals in the Green Belt. Some of the principles apply; but, in the Green Belt, NPPF Green Belt policy applies – see Section 4 - Development in the Green Belt (which explains the stricter policy requirements that operate in Green Belt areas). <u>Where policy principles in Policy 25 do apply to Green Belt proposals, these are fully explained in Section 4.</u></p> <p>Amend paragraph 3.10.4 to delete "for this reason" to read:</p> <p>"Outside of these areas (i.e. in the Green Belt; adjacent to any 'Defined Village'; or in the Countryside Policy Area more widely), development would not be approved for this reason."</p> <p>No amendments required.</p>

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	<p>Paragraph 4.4.47</p> <p>Paragraph 4.4.48</p>	<p>154g of the National Planning Policy Framework (2023) allows for “limited infilling” and the partial or complete redevelopment of previously developed land. Paragraph 4.4.46 of the draft SPD identifies that there is no definition of “limited infilling”. Whilst the draft SPD states that “a general accepted definition of “infilling” is “a small gap in an otherwise built-up frontage”, it goes onto say that “in the context of 154g infilling need not be restricted to just a small gap in an otherwise built-up frontage and can be wider in scope within the confines of a previously developed site, each case being considered on its own merits”. This latter clarification is welcomed.</p> <p>Reference to NPPF Annex 2, which provides the definition of previously developed land, is made at paragraph 4.4.47. However, it is considered that it would be beneficial for both applicant and the decision-taker to provide further up-front clarification so that it explicitly includes: <i>“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.”</i></p> <p>Paragraph 4.4.48 of the draft SPD identifies that when considering the impact of development on the openness of the Green Belt, reference should be had to section 4.2 of the draft document. Paragraph 4.2.2 references the national Planning Practice Guidance which states that assessing the impact of a proposal on the openness of the Green Belt, requires a judgement based on the circumstances of the case. Whilst the Planning Practice Guidance goes onto identify “by way of <u>example</u>” [our emphasis] matters which may be to be taken into account in this assessment, the draft SPD presents these same matters as the baseline for assessment beyond which consideration of further matters maybe required, stating “These [matters] include, <u>but are not limited to...</u>” [Council’s emphasis]. Paragraph 4.2.2. should be reworded to align with the expectations of national guidance.</p>	<p>be made any clearer (noting a suggestion has not been provided in the comment).</p> <p>This is an example of planning policy where it is difficult (and in fact wrong) to provide an explicit all-encompassing definition. As the paragraph concludes, each case should be considered on its own merits.</p> <p>It is unnecessary to repeat the NPPF Annex 2 definition in the document (where it can be quickly accessed via the provided hyperlink).</p> <p>The deliberate emphasis of “but are not limited to” is considered clear enough to explain that the subsequently listed matters, taken from the PPG, are not an exclusive list and are only examples. No further change is considered necessary.</p>	<p>No amendments required.</p> <p>No amendments required.</p>
<p>Owners of Land South of Ridgill Avenue, Skellow (Agent: Susan Chan)</p>		<p>[Comments made in context of previous failed attempts to promote land, south of Ridgill Avenue, Skellow, for residential use via Local Plan representation and planning application (20/00992/FUL appeal dismissed November 2021 APP/F4410/W/21/3276971).]</p> <p><u>Permitted Development: Part 3 Class Q</u> (agricultural buildings to dwellinghouses)</p> <p>SPD should provide information requirements for Class Q – suggest a checklist be used covering issues not mentioned in the SPD such as floor area limits, highways, noise, pollution and flood.</p>	<p>A conclusive decision on the suitability of residential development on land south of Ridgill Avenue, Skellow has been made via appeal decision APP/F4410/W/21/3276971.</p> <p>The requirements of Class Q are considered sufficiently clear. A checklist would only replicate these requirements without added benefit whilst such further interpretation would be open to challenge and could prove to be problematic.</p>	<p>No amendments required.</p>

Name / Organisation	Section / Paragraph	Comment Summary	CDC Response	SPD Amendments
		<p>Seeks commitment from Council for negotiation and pro-active working on prior notification akin to full planning applications.</p> <p><u>Permitted Development: Other Classes</u></p> <p>Seeks 'clarification' of other classes (than Part 3 Class Q) relating to commercial, offices and mixed uses.</p> <p><u>Pre Application Service for Countryside and Green Belt proposals</u></p> <p>Pre-application advice is very policy driven for countryside and green belt land. Whilst this SPD could reduce the number of pre-apps for rural developments, in the event of a pre-app, what would the benefits be over and above the information contained in the SPD? Could there be a bespoke pre-app service solely for countryside and green belt land?</p> <p><u>Design Panel</u></p> <p>Seeks opportunity to present draft designs to Doncaster's Design Panel to inform preparation of applications.</p> <p><u>Rural Worker Dwellings and Land Quality</u></p> <p>Not all green belt land is agricultural ready or suitable for rural enterprises due to previous industrial use, pollution, location, access, etc. Some Councils operate a grading system where sites in the green belt are assessed using a points based methodology for their suitability for agriculture or indeed, another type of use. Could Doncaster offer this as part of the SPD?</p> <p><u>Limited Infill</u></p> <p>Sites such as land south of Ridgill Avenue, Skellow should be seen as infill sites (end of terrace but enclosed, left over after development with no agricultural history and lacking purpose or value).</p>	<p>The Council is required to make decisions on prior notifications within the statutory timetable. Inevitably this means determining submissions as they stand rather than entering into negotiation following submission. Applicants should be encouraged to satisfy themselves that all requirements of Class Q are suitably met ahead of making a formal submission.</p> <p>Given the frequency that permitted development rights (and associated use classes) change, incorporating these other others into the SPD would likely be out of date soon after publication. Equally, any such clarification would only be replicating the General Permitted Development Order because any "interpretation" would be open to challenge and could prove to be problematic.</p> <p>The relevant applications forms (and supporting guidance) for submission of prior approval applications are considered sufficient to prompt the information considered necessary for consideration of prior approvals.</p> <p>CDC is shortly intending to relaunch its pre-application advice services for certain development types. The service recognises the importance of engaging in constructive pre-application discussions and will not simply be an exercise in regurgitating adopted policy or SPD content, but rather will offer bespoke, tailored advice to enable applicants to take projects forward to application stage confidently. More information will be available on the Council's website in due course.</p> <p>The Council does not have the resource capacity to routinely offer this service as part of pre-applications but the option is available to present pre-applications to the Panel.</p> <p>This is considered overly prescriptive and unnecessary. Apart from being resource-intensive to undertake, it could be open to errors in consistency and is likely to quickly date. The Council prefers that each site be considered on its own merits based on a site's characteristics at time of application.</p> <p>Definition of infill for the purposes of the SPD are provided in relevant parts of the SPD. As for the land south of Ridgill Avenue, Skellow, appeal decision</p>	<p>No amendments required.</p> <p>No amendments required.</p> <p>No amendments required.</p> <p>No amendments required.</p> <p>No amendments required.</p> <p>No amendments required.</p>

Name / Organisation	Section / Paragraph	Comment Summary	CDC Response	SPD Amendments
		<p>SPD should include Council's expectation of density (units per hectare) for infill sites.</p> <p>SPD should consider the context and character of Green Belt sites.</p> <p><u>Previously Developed Land</u></p> <p>SPD needs to provide further guidance and examples for PDL. The NPPF is too open ended and technical advice is needed</p> <p><u>Affordable Housing</u></p> <p>Guidance on housing to demonstrate affordable housing need should be given.</p> <p><u>Planning Gain</u></p> <p>Technical guidance for planning gain in rural areas should be given on environmental enhancement of the area either on or off-site</p>	<p>APP/F4410/W/21/3276971 clearly concluded that this site is not infill.</p> <p>This is not considered necessary or even desirable as each planning application must be considered on its own merits. If a site is considered to be infill consideration of density will depend on the specific characteristics of that site.</p> <p>Section 2.2 (Local Policy) of the SPD sets out other relevant Local Plan policies that can help determine proposals in the countryside (including those which consider site context and character). Such policy can also apply within the Green Belt (subject to Green Belt policy) as fully described in Section 4 of the SPD.</p> <p>The SPD relies upon the definition of PDL given in Annex 2 of the NPPF. It is not considered necessary to go beyond this definition as it is quite self-explanatory. Each planning application will be considered on its own merits.</p> <p>Section 2 of the Council's Technical and Developer Requirements SPD provides such guidance. Reference is made to this separate SPD in Section 3.4.</p> <p>It is the Council's preference that such considerations should take place as part of normal policy interpretation and implementation rather than through Planning Gain wherever possible. Technical guidance on various topics is given in both the Local Plan and other SPDs. The need for specific 'planning gain' guidance for rural area is not considered necessary.</p>	<p>No amendments required.</p> <p>No amendments required.</p> <p>No amendments required.</p> <p>No amendments required.</p> <p>No amendments required.</p>
Sport England	Paragraphs 4.4.7 – 4.4.14	<p>Concerned that the SPD may result in sports clubs, as well as existing and new playing field/outdoor sports sites, not being able to gain planning permission for the necessary ancillary facilities, such as car parking, storage units, changing rooms and toilets, club houses/pavilions, spectator areas, fencing and sports lighting, etc.</p> <p>Citing an planning appeal decision in Buckinghamshire (APP/N0410/W/23/3326343), Sport England maintain that it is not uncommon for development proposals for club houses/pavilions/changing rooms facilities to take place on land designated as Green Belt.</p> <p>Sport England would welcome revised and additional wording within the SPD that supports the provision of the necessary ancillary facilities that will enable existing and new playing</p>	<p>SPD paragraphs 4.4.7 to 4.4.14 give guidance on the local interpretation of NPPF paragraph 154b which the Council agrees does allow for appropriate facilities for outdoor sport and recreation in the Green Belt. This guidance is considered to be an appropriate positive explanation of NPPF 154b which explains the supportive approach the Council will take to such applications. It is unclear why Sport England believe the SPD could be interpreted as conflicting with NPPF 154b policy.</p> <p>The Appeal Decision referred to is noted but each application has to be considered on its own merits; and, in any case, the Council does not dispute the principle that appropriate facilities in the context of NPPF paragraph 154b should be considered positively.</p>	<p>Amend paragraph 4.4.9 to insert additional text after the first sentence to read:</p> <p>"In terms of outdoor sport and recreation it would be expected that activities would be mostly outdoor, not indoor. <u>These could include, for example, car parking, storage units, changing rooms and toilets, club houses/pavilions, spectator areas, fencing and sports lighting.</u> Horse related development in the Green Belt can be assessed against NPPF Paragraph 154b and the guidance given in Section 3.9. Any facility, or element of a proposal, not considered an appropriate facility will be required to demonstrate 'very special circumstances'.</p>

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		field sites and other outdoor sports facilities to be sustainable.	For the avoidance of doubt, a change is proposed to be made to paragraph 4.4.9 to illustrate, by example, the types of facilities that could be considered ancillary (dependant upon the individual circumstances of any given planning application).	