Hearing Statement – Matter 3

Doncaster Local Plan

On behalf of Avant Homes

August 2020
I. **Introduction**

1.1. This is a Hearing Statement prepared by Spawforths on behalf of Avant Homes in respect of:

- Matter 3: Strategic Approach

1.2. Avant Homes has significant land interests in the area and has made representations to earlier stages of the Local Plan process.

1.3. The Inspector's Issues and Questions are included for ease of reference. The following responses should be read in conjunction with Avant Homes comments upon the submission version of the Doncaster Local Plan, dated September 2019.

1.4. Avant Homes has also expressed a desire to attend and participate in Matter 3 of the Examination in Public.
2. **Matter 3 – Strategic Approach**

**Q3.1.** Is the presumption in favour of sustainable development set out in policy 1 consistent with national policy and would it be effective in helping decision makers know how to react to development proposals?

2.1. Avant Homes has no specific comment in relation to this issue.

**Q3.2.** Is the broad spatial distribution of development proposed in policies 2 and 3 justified? In particular, the aims to accommodate:

a) At least 50% of new homes in and around the Main Urban Area; approximately 40% at seven Main Towns; and about 10% at ten Service Towns and Villages.

b) The ranges for the number of new homes in and around each of the individual Main Towns and Service Towns and Villages.

c) Major new employment sites in locations accessible from the Main Urban Area and Main Towns in locations attractive to the market with good access to the strategic transport network as well as Doncaster Sheffield Airport.

d) Retail, leisure, office, cultural and tourist developments in the network of town centres defined in Table 2.

2.2. Avant Homes have raised significant concerns relating to the overall need for development proposed in Policy 3, and these are raised in Matter 2. Avant Homes is concerned with the Spatial Strategy and distribution and the consistency between the proposed distribution within Policy 2 and 3 and the proposed allocations for housing and employment.

2.3. Policy 2 and 3 focus growth towards Doncaster, followed by the Main Towns and then a smaller element within the Service Towns and Larger Villages.
2.4. Policy 2 and 3 seek to ensure at least 50% of the Borough’s total housing should be within Doncaster MUA. This equates to the provision of at least 9,200 against the upper end requirement of 18,400. The Housing Policy Topic Paper refers to a residual requirement of 882 dpa over the remaining 17 years (50% of 14,994 equates to 7,497). However, the target when expressed in numbers within Policy 3 is 6,805 to 7,315. Table 3.3 in CSD 7 confirms that the target range established within Policy 3 for the MUA falls below 50% of the Boroughs total housing supply.

2.5. Avant Homes therefore considers that there is a need to review the quantum of housing expressed within Policy 2 and 3 to ensure the policies themselves are consistent. As indicated in response to Q3.4, Avant Homes consider there is a need for further allocations within Doncaster MUA to ensure that the Plan is capable of delivering its spatial strategy and ensuring the delivery of at least 50% of housing within the MUA. The policy, as currently expressed, lacks consistency and clarity. This is not aided through the use of a range within the policy requirement. Avant Homes considered the implications of using a range under Matter 2, and consider that this approach is not justified in the context of the level of economic growth being sought within the Plan.

2.6. The Plan does not seek to identify sites in other defined villages. This approach does not support the planned delivery of housing in defined villages which would serve to meet local housing needs in settlements that are relatively sustainable. This is not consistent with national policy (paragraph 78) which is clear that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.

2.7. Avant Homes is concerned that the policy approach for defined villages that is proposed within the Plan lacks clarity. Policy 2 lists 40 defined villages. Policy 3 identifies a defined village’s cumulative Growth Limit that are not surrounded/within Green Belt locations, although this is not explicit within the policy itself. Avant Homes consider that the exclusion of defined villages, that are surrounded by Green Belt/within Green Belt, from Policy 3 serves to reduce the clarity in the approach for these excluded but ‘defined’ villages.

2.8. Policy 2 provides support for infill development within the defined villages. It goes on to state that in exceptional circumstances, subject to the demonstration of clear local community support, residential development in appropriate locations may also be supported in the Countryside on land adjacent to the development limits. Given that there is policy support
for appropriate development within the defined villages, even those that are surrounded by Green Belt, it appears inconsistent to exclude these villages in Policy 3.

2.9. It is unclear what role the Sustainability Assessment has had in informing the approach for the Defined Villages within Policy 3, and the cumulative growth limit, accepting that this does not form an allocation. There are a number of villages within the Green Belt, such as Wadworth, that are sustainable villages. Wadworth has a range of facilities with good access via a range of modes to Doncaster MUA, Tickhill, and is well placed to provide a greater role than currently identified. It benefits from a higher score for settlement facilities than a number of the defined villages identified in Policy 3, such as Arksey, Blaxton, Austerfield and Fishlake. Significantly, given the concerns we raise in Matter 1 a number of villages listed with a cumulative growth limit appear to be constrained by flood risk, including amongst others, Arksey, Blaxton and Fishlake.

2.10. Avant Homes consider that the approach with regards to Defined Villages within Policy 2 and 3 should be clarified, and further that allocations should be made within Defined Villages having regard to their relative sustainability, relationship with other larger settlements, and constraints, notably flood risk, consistent with the Frameworks approach to flood risk, Green Belt and approach to rural housing.

2.11. The policy as currently expressed lacks consistency and clarity. This is not aided through the use of a range within the policy requirement. Avant Homes consider the level of growth for the Main Towns, and Service Towns and Villages should reflect the potential for economic growth in those locations in order to support sustainable travel patterns. As noted above, Avant Homes consider that allocations should be made in Defined Villages to ensure that land can come forward where it is needed.

Part B

2.12. As considered in Matter 2, Avant Homes do not consider that it is appropriate to express the requirement as a range. It is considered that this creates internal inconsistencies within the Plan and indeed within Policy 3 between the % target and numerical totals of the top end of the range for main towns, and that the particular circumstances in Doncaster clearly justify a higher requirement than the figure produced by the standard methodology. The use of a range does not provide any certainty to those with an interest in the settlement. The requirements for the Main Towns should be revised to provide a single minimum figure. As stated above,
these should reflect a settlement’s potential for growth, and alignment with the strategy for employment land. Avant Homes consider that the level of economic uplift applied to each Main Town should be reviewed to account for the economic growth and regeneration potential of the Main Towns.

Part C

2.13. Avant Homes has no specific comment in relation to this issue.

Part D

2.14. Avant Homes has no specific comment in relation to this issue

2.15. Avant Homes consider that the approach to spatial distribution needs to be reconsidered in order to ensure internal consistencies within the Plan including the balance between housing and economic growth, ensuring that at least 50% of development is within the Main Urban Area. Avant Homes consider that the role of Defined Villages which are currently excluded from Policy 3 should be clarified and that allocations should be made within Defined Villages.

Q3.3. Is the broad spatial distribution of development proposed by the employment and housing allocations in policies 4 and 6 justified having regard to the aims set out in policies 2 and 3? Are any main modifications required to ensure that the Plan is unambiguous and internally consistent in this respect?

2.16. As considered in response to Matter 2, and in response to Q3.2, Avant Homes consider that there should be a single housing requirement and that expressing the requirement as a range is not justified in Doncaster. Expressing the figures as a range creates ambiguity, and does not provide for an internally consistent document, where policy on level of employment growth is supported and the lower of the figures would not account for such economic growth. The use of a range also could result in a distribution of development that does not reflect the strategy also being proposed through Policies 2 and 3 as submitted.
2.17. Notwithstanding these fundamental concerns, the resultant housing allocations do not reflect the proposed distribution. There remains a deficiency and a significant under provision in the following Settlements: Doncaster; Adwick, Conisbrough – Denaby, Mexborough, Thorne Moorends, Sprotbrough, Tickhill and Bawtry.

2.18. This is of particular concern in relation to Doncaster MUA which is identified as the focus for economic and housing growth, and therefore should be accommodating more housing. SDEB 7 Table 3.3 considers that the proposed distribution resultant from allocations is just over 46% of the total allocations. Furthermore, our analysis of sites that are proposed to be allocated shows that some should be discounted due to technical and viability concerns. For example, Site 838 has significant concerns and has been shown in the Council’s evidence to have technical issues and to be unviable.

2.19. Our analysis also shows that the supply of housing in Doncaster is constrained. Housing permissions have lapsed, more recent permissions have reduced the quantum of housing provided, and development has stalled on sites with significant constraints. The discount to be applied over the Plan period amounts to at least 116 dwellings, although we would expect this figure to be potentially higher. This further impacts on the consistency between the plan aspirations and proposed allocations. Further allocations under Policy 6 are required in Doncaster Main Urban Area to ensure that the Plan is capable of delivering the spatial strategy established in Policy 2 (as submitted) and Policy 3.

2.20. Avant Homes consider that the Plan should be modified and the following sites should be allocated.

- Site 494, Green Lane Scawthorpe. As indicated in Matter 1, the site performs better than other allocated sites in the Sustainability Assessment such as 836, it passes the sequential test, and performs better than other sites that have been allocated in relation to the Green Belt Assessment.

2.21. Avant Homes consider that there are Exceptional Circumstances to support the release of the sites from the Green Belt, in relation to housing need (Matter 2) and the need in Doncaster MUA.
Q3.4. Is the suggested change to policy 2 set out in the Council’s response to PQ14 necessary to make the Plan sound?

2.22. Avant Homes has no specific comment in relation to this issue.

Q3.5. Is the approach to deciding development proposals based on the figures for new homes set out in policy 3 for Doncaster Main Urban Area, the Main Towns and the Service Towns and Larger Villages justified, and is it sufficiently clear to be effective?

2.23. Avant Homes do not consider that the approach to deciding development proposals based on the figures for new homes that are set out in Policy 3 are justified, nor do we consider that the approach is sufficiently clear.

2.24. In line and consistent with the approach to economic growth, and the need for employment land expressed in Policy 3, the approach to expressing the housing requirement as a range is not justified or clear as considered under Matter 2 (Q2.5) and in response to Q3.2 above.

2.25. The approach to establishing the requirement as a range for homes in the Main Urban Area, Main Town, Service Towns, and Larger Villages is equally not justified or clear in its present form. Avant Homes have considered in response to 3.2 and 3.3 where there are inconsistencies between the distribution proposed and the allocations proposed where this has resulted in deficit. The range identified for Doncaster MUA, is not sufficient to ensure that the strategy to deliver at least 50% of development within the MUA can be achieved. The approach taken and lack of consistency internally within the document undermines the effectiveness of the policy.
Proposed Change

To overcome the objection and address soundness matters, the following changes are proposed:

- Review and amend the Spatial Strategy.
- Review the approach to the housing requirement, and requirements for Main Urban Area, Main Towns, Service Towns and Villages, and defined villages to ensure that the Plan is internally consistent. Express the requirement as a single minimum figure.
- Allocate additional sites to ensure that the spatial strategy proposed is capable of being delivered.