Hearing Statement – Matter 3

Doncaster Local Plan

On behalf of H. Burtwistle & Son

August 2020
1. **Introduction**

1.1. This is a Hearing Statement prepared by Spawforths on behalf of H. Burtwistle & Son in respect of:

- Matter 3: Strategic Approach

1.2. H. Burtwistle & Son 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 in bold for ease of reference. The following responses should be read in conjunction with H. Burtwistle & Son comments upon the submission version of the Doncaster Local Plan, dated September 2019.

1.4. H. Burtwistle & Son 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. H. Burtwistle & Son 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. H. Burtwistle & Son has raised significant concerns relating to the overall need for development proposed in Policy 3, and these are raised in Matter 2. H. Burtwistle & Son 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. H. Burtwistle & Son consider that distribution across the Main Towns should not just reflect the current size of the town but also reflect their location with respect to the wider economic growth and regeneration aspirations of the Borough.

2.5. H. Burtwistle & Son consider that the target for the level of housing growth in Thorne and Moorends should also have regard to its regeneration ambitions, the IMD 2019 indicates that deprivation has worsened within Thorne Moorends since 2015, with the ward containing neighbourhoods which are amongst the 10% and 20% most deprived neighbourhoods in the country. Regard should also be given to its location on the Strategic Road Network, its opportunities for multi modal transport, and the level of facilities available including within the designated town and local centres, and train stations. Given the need for regeneration and investment within Thorne Moorends, as sought within the Plan 16.131, and evidenced in latest IMD data, and in recognition of the location of Thorne Moorends and its connectivity to the transport network, existing employment and facilities within its designated town and local centres, it is vital that sufficient land for housing is identified within Thorne Moorends. H. Burtwistle & Son consider that within this overall strategic approach, new allocations should be informed by an adequate Level 2 SFRA, ensuring that allocations are appropriate.

2.6. The policy as currently expressed lacks consistency and clarity. This is not aided through the use of a range within the policy requirement. H. Burtwistle & Son 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, H. Burtwistle & Son consider that further/alternative allocations should be made in Thorne and Moorends to ensure that land can come forward where it is needed.

2.7. Part B

2.8. As considered in Matter 2, H. Burtwistle & Son 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 produce by the current 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 requirement. As stated above, these should reflect a settlement’s potential for growth, and alignment with the strategy for employment land. H. Burtwistle & Son 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.

2.9. Part C

2.10. H. Burtwistle & Son has no specific comment in relation to this issue.

Part D

2.11. H. Burtwistle & Son has no specific comment in relation to this issue

2.12. H. Burtwistle & Son 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. H. Burtwistle & Son consider that further growth should be supported in the Main Town of Thorne Moorends, responding to its locational advantages.

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?

2.14. As considered in response to Matter 2, and in response to Q3.2 H. Burtwistle & Son 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.

2.15. 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.

2.16. H. Burtwistle & Son note that policy 2 indicates that housing allocations to accommodate economic led housing growth are directed to the most sustainable and deliverable urban and urban extension sites in the Doncaster Main Urban Area and Main Towns in accordance with the growth ranges set out in Policy 2 and in accordance with a sequential approach to flood risk.

2.17. In Thorne the number of dwellings allocated in the Submission Plan amounts to 736 dwellings this sits significantly below the top end of the range which would support economic growth. Further our review of sites indicates that three of the sites have stalled, or permission has lapsed. This amounts to 113 dwellings.

2.18. Of the 19 employment allocations, three are located around Thorne, reflecting its location, on the M18 and M180 and rail network. Further the Plan is seeking to support the regeneration of the North of Doncaster, this is reflected in Policy 2 and 3, and explanatory text paragraph 4.31 and 16.130. Therefore not meeting the requirement for housing that supports economic growth runs counter to the ambitions of the Plan for Thorne. It undermines the proposed distribution and will lead to mismatch between housing and employment. The council [PQ12, DMBC 7] recognise that there is a need to balance the need to avoid flood risk where possible but acknowledge the need for regeneration, the delivery of affordable housing and delivering development close to existing services and facilities. H. Burtwistle & Son considers that there is a need therefore to identify further residential allocations in Thorne to support the Councils economic ambitions and ensure consistency with the Spatial Strategy. Consistent with national policy, allocations in Thorne should be informed by a Level 2 SFRA, as discussed in response to Matter 1. H. Burtwistle & Son that all sites identified as failing the Sequential Test need therefore to be reviewed in the light of the Level 2 SFRA and appropriate Sustainability Appraisal [ID -7].
2.19. H. Burtwistle & Son consider that the Plan should be modified and the following sites should be allocated:

- Site 244/331 Coulman Road, Thorne, The site performs better in the Sustainability Appraisal than proposed allocation 81/343 and Site 396.
- Site 313/245, Northgate, Thorne

Q3.4. Is the suggested change to policy 2 set out in the Council’s response to PQ14 necessary to make the Plan sound?

2.20. H. Burtwistle & Son 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?

2.21. H. Burtwistle & Son 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.

2.22. 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.

2.23. 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. H. Burtwistle & Son 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 approach taken and lack of consistency internally within the
document undermines the effectiveness of the policy.

**Proposed Change**

2.24. 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 and Main Towns 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.