This statement relates specifically to Inspector’s Questions 3.2 to 3.5 Spatial Strategy

1. With reference to our Matter 1 Statement, we do not consider that the proposed spatial strategy is consistent with NPPF para 148, shaping places to contribute to radical reductions in greenhouse gas emissions. The spatial strategy and settlement hierarchy are fundamental to place-shaping and must therefore be explicitly informed by the climate imperative.

2. In our Reg 19 representations we suggested a re-wording of the first part of Policy 2, to lay the foundations of a climate-informed spatial strategy, as follows: Doncaster’s Spatial Strategy will focus on delivering development that is appropriate to the size and needs of individual settlements, and better equips those settlements to achieve the radical reductions in greenhouse gas emissions required by national policy. This development should meet the needs for new homes and jobs, regenerate places and communities, support necessary infrastructure, services and facilities, and enable transformative improvements to carbon efficiency and opportunities for active travel.

3. Addressing the broad spatial distribution (Policies 2 and 3), we have identified the following problems.

3.1 Settlement Hierarchy

3.1.1 The Main Urban Area encompasses several smaller settlements which, in our view, should be considered within separate sub-groups of smaller settlements instead of being absorbed into the Main Urban Area. These are: Cantley, Edenthorpe, Kirk Sandall, Bentley, Scawthorpe, and Scawsby. While these settlements are treated as part of urban Doncaster, there is no way to account for spatial distribution between them, or their distinct needs, which is especially problematic when considering housing land supply requirements and housing mix. For example, Bentley and Cantley are self-evidently very different places, and it is not logical for their housing supply requirements to be grouped together. By contrast, there is a clear logic to considering the affordable housing and housing mix needs of Cantley alongside those of Branton, and those of Bentley alongside those of Adwick. (Bentley and Adwick even share a rail station).

3.1.2 Based on our previous analysis of this problem, we proposed in our previous representations a sub-area approach, in which groups of settlements are considered in a way that is more polycentric, and each sub-area contains a pattern of settlement and areas of countryside. It remains our position that the settlement hierarchy is unsound in its current form, and a sub-area approach along the lines we recommended is needed to remedy this.

3.1.3 This in turn addresses the second main problem with the spatial strategy, which is that there is no spatial strategy for the countryside. For all the diversity of Doncaster’s
countryside, it is lumped together as one spatial type (sub-divided into ‘Green Belt’ and ‘Countryside’ but with no other distinguishing features), which is simply treated as the empty space outside of settlement boundaries.

3.1.4 This lack of active planning for the countryside, and treating it as one spatial type, leads to the egregious Policy 2(5), whereby any parcel of land outside any tier 1 to 3 settlement would be equally susceptible to being released for development in the absence of a borough-wide 5-year housing land supply, regardless of the spatial characteristics of the land supply or the local relationship between the settlement, its countryside or its own development needs.

3.2 Employment Land Distribution

3.2.1 The concentration of new employment land on a small number of very large, peripheral sites runs counter to national policy, especially NPPF para 103 – “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes”; and para 104a – “support an appropriate mix of uses across and area, and within large scale sites, to minimise the number and length of journeys…”.

3.2.2 As we have articulated previously, the major employment sites will be overwhelming accessed by car, are largely disconnected from where people live, and reinforce a dispersed, road-hungry pattern that is directly at odds with addressing the climate challenge.

3.2.3 This is compounded by the Plan relating potential employment growth in the north of the Borough to a putative A1-A19 link road, for which no proposals are actually shown but which would bring a further dose of road-based dispersal towards the end of the plan period.

3.3 Airport

3.3.1 We accept that the airport plays a role in the local economy, and also that aviation-related carbon emissions are an issue that require national and international action. However, the carbon emissions arising from surface access to the airport itself, and from developments surrounding the airport, are entirely within the remit of the Borough’s spatial policies. Pinning a substantial proportion of the Borough’s economic ambitions and a huge component of its physical growth around the continued growth of the airport therefore risks being catastrophically at odds with its climate obligations.

3.3.2 The national policy context for this is found in the following NPPF paras:
• 148 – “shape places in ways that contribute to radical reductions in greenhouse gas emissions”;

• 72a – “[larger scale developments should] consider the opportunities...for net environmental gains”

3.3.3 In other words, it may be technically possible for the scale of development proposed around the airport to be found sound, if it could be demonstrated that it would result in both a net reduction in greenhouse gas emissions and a net environmental gain for the Borough, once the increased road-dependence, the increased economic reliance on the airport, and the increased proportion of Doncaster residents affected by aircraft noise, have been taken into account. This has not been demonstrated and is barely acknowledged. Instead, the economic potential of the airport is taken as read, and the spatial strategy is configured around it.

4. Council’s Proposed Changes in response to PQ14 and PQ15

4.1 These changes do nothing to address our concerns, because they do not address the specific aspects in which we consider the spatial strategy unsound, namely the settlement hierarchy, peripheral emphasis of employment development and dependence on the airport, as described above. Nor do they address the problem of Policy 2(5) in relation to allowing development in a generically-described ‘countryside’. 