Examination of the Doncaster Local Plan

Council Hearing Statement

Matter 3.
Strategic Approach

September 2020
Presumption in favour of sustainable development

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?

1. NPPF Paragraph 11 (OTH39) states that Plans should apply a presumption in favour of sustainable development.

2. The inclusion of Policy 1 was guided by the former advice of the Planning Inspectorate who suggested a model policy which, if included in a Local Plan, would be an appropriate way of meeting the expectation in the NPPF that plans include policies to guide how the presumption in favour of sustainable development will be applied locally. Paragraph 15 of the previous 2012 version of the NPPF (OTH40) required Local Plans to have "clear policies that will guide how the presumption should be applied locally".

3. However, current guidance in the Planning Practice Guidance at Paragraph 36 of 'Plan Making' (ID: 61-036-20190723) states that there is no need for a plan to directly replicate the wording of NPPF paragraph 11 in a policy.

4. The Council considers the Local Plan's policies taken as a whole (and when read in conjunction with the NPPF) reflect the presumption in favour of sustainable development. It is therefore suggested that Policy 1 can be removed from the Plan via a Proposed Main Modification.

   Proposed Main Modification:

   Delete third sentence of Paragraph 4.1, Policy 1 and Paragraphs 4.2-4.4 of the Explanatory Title to Policy 1.

Spatial strategy

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.

5. Early consultations on the Local Plan proposed various options for the distribution of development, including new homes, throughout the Borough.
6. The 2015 Issues and Options consultation\(^1\) set out 3 main options (with 3 others rejected because of their potential to restrict long term economic growth and prosperity and undermine efforts to regenerate and renew former mining communities contrary to the aims and objectives of the Local Plan).

7. The 3 proposed options were:
   - Option 1 which was a 'business as usual' continuation of the adopted Core Strategy approach;
   - Option 2 which focussed more on Doncaster and Main Towns with reductions in surrounding areas; and
   - Option 3 which proposed greater dispersal of growth across wider range of settlements such as smaller market towns and free-standing villages.

8. Appendix 1 of the 2015 Consultation\(^2\) compares the housing growth distribution for each of the proposed options.

9. Consultation responses contained two clear messages regarding housing distribution: i) the larger and more sustainable urban areas ought to be the main focus for housing growth; and ii) local housing needs should be met locally and this should extend to those smaller settlements that provide a good range of services.

10. Consultation responses strongly supported Options 1 and 2 but there was significant support for providing housing close to where services were available to meet local need. There was also support for various forms of hybrid Option.

11. The Sustainability Appraisal of the Issues and Options\(^3\) found that Option 2 ("urban concentration") was considered overall to be the most sustainable of the strategic options in terms of distributing growth and development across the borough; Option 1 (the “business as usual option”) was also potentially suitable and deliverable.

12. Following the consultation on Issues and Options, a new hybrid option was developed and presented in the 2016 Homes and Settlements Consultation\(^4\). In this option housing would be more dispersed relative to Options 1 and 2 but more growth will be directed towards the main urban area and main towns than Option 3.

13. The 2019 Sustainability Appraisal Report\(^5\) and accompanying appendices, document appraisal of the Local Plan including the preparation and consultation of growth options 1-3 and the preferred hybrid option which has been taken forward in the Local Plan. Paragraphs 5.2.27-5.2.33

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\(^1\) AE01 Doncaster Local Plan Issues and Options (2015)
\(^2\) AE01 Doncaster Local Plan Issues and Options (2015), Appendix A, pages 25-28
\(^3\) AE06 Sustainability Appraisal of Doncaster's Growth Options (2015)
\(^4\) AE03 Homes and Settlements Consultation (2016)
\(^5\) CSD7.1 Sustainability Appraisal Report 2019
(page 42) summarise the reasons for rejecting Options 1-3 and choosing the preferred hybrid Option.

14. A Settlement Audit published in 2015 (and subsequently revised in 2017 and 2020) examined what services exist in which settlements across the Borough. This helped inform where the most appropriate locations for housing were in accordance with the preferred settlement strategy. Generally, and as may be expected, larger settlements in terms of population and size had better levels of service provision, supporting the preference to allocate the majority of new development to the Main Urban Area and the Main Towns.

15. Table 3 of the Local Plan summarises the preferred proposed Settlement Hierarchy.

16. Housing growth is composed of two main elements: baseline or normal household growth and economic-led growth.

17. The economic-led housing growth is distributed to Doncaster and the Main Towns only, not on a pro-rata basis but in accordance with growth ranges that will provide some flexibility to select the most sustainable and deliverable sites across these settlements. The Settlement Audit (updated throughout plan preparation) shows that Doncaster and the seven Main Towns are clearly larger than, and have a greater service function than, other settlements in the Borough. It is proposed that 60-70% of the economic-led housing growth is directed to Doncaster Main Urban Area in recognition of its status as a sub-regional centre that serves the whole Borough and a wider catchment. It is proposed that up to 10% of the economic-led housing growth is distributed to each of the Main Towns in recognition of their relatively high service level provision and relative sustainability.

18. This approach, and why the use of growth ranges for distributing housing amongst the two upper tiers of the Settlement Hierarchy is justified, is discussed in the answer to Q3.2b below.

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

19. The Local Plan’s overall strategy requires that at least 50% of new homes will go to the ‘Main Urban Area’, approximately 40% to the ‘Main Towns’ (and about 10% to the ‘Service Towns and Villages’). Why this is a justified approach is explained above in answer to Q3.2a.

20. The Local Plan’s housing requirement is distributed amongst 18 settlements in the Borough across the top 3 levels of the Plan’s Settlement Hierarchy.

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6 SDEB2.2 Settlement Audit (2020 Update)
7 CSD3 Doncaster Local Plan Regulation 19 Publication Version, Table 3, page 22
21. New dwellings to accommodate baseline (normal household growth without any uplift for economic growth) is allocated to the top 3 levels of the Plan's Settlement Hierarchy. Baseline growth is a proportionate split based on the % of existing households in an area. (Baseline growth from the Defined Villages is reallocated to the top 2 levels of the hierarchy as no allocations are proposed in the Defined Villages due to their low sustainability and service provision).

22. Economic growth is allocated to the top 2 levels of the Settlement Hierarchy only. Of the economic uplift 60 – 70% is distributed to the Main Urban Area and up to 10% each to the Main Towns. The majority is distributed to the Main Urban Area in recognition of its status as a sub-regional centre which serves the whole borough and wider catchment.

23. As shown in Policy 3, ranges are proposed to guide how growth in the Main Urban Area and the Main Towns is to be achieved. More specifically ranges are employed to guide the distribution of economic uplift derived housing within the Main Urban Area and the 7 Main Towns.

24. So, in the Main Urban Area, 60 – 70% of the economic requirement equates to 3,055 – 3,564 dwellings. In the Main Towns, up to 10% of the economic requirement is to be distributed to each of the 7 settlements; this equates to between 0 to 509 dwellings in each town. These amounts are in addition to baseline growth.

25. The 2016 Homes and Settlements Consultation\(^8\) first introduced the notion of ranges for the housing targets for the top two tiers of the settlement hierarchy. These ranges provide a means by which settlements can deliver more or less against their targets but which also allows the overall figure for each tier, and for the Borough as a whole, to balance.

26. The ranges provide flexibility in acknowledgement of the fact that there are known constraints in some areas, such as flood risk or Green Belt, which means that delivering towards the top of the range in certain locations may prove challenging. This flexibility allows selection of the most sustainable and deliverable sites across these settlements. During plan making, the higher end of the range is not "forced" to be achieved if constraints are considered to override need in any particular settlement. This will include, for example, application of the flood risk sequential approach to urban sites and sustainable urban extensions across these settlements.

27. Not every settlement has to deliver at the top of its range for the Borough to meet its overall economic housing "target". The purpose of the ranges is that some settlements may be able to deliver towards the top of their range, and others towards the bottom, but collectively the numbers will balance out and respective tiers will deliver their overall housing targets. Within the Main Towns, if every settlement delivered at the top of their range, there would be an over-supply against the Main Town target of 35

\(^8\) AE03 Homes and Settlements Consultation (2016)
40% of the Borough’s total housing, and vice versa if all settlements delivered towards the bottom.

28. The table on page 39 of the Housing Topic Paper illustrates numerically how the housing requirement for the Borough is distributed in the Borough, taking account of baseline and economic need and the growth ranges.

29. The exact distribution of the allocation of the economic-led housing growth element across the Main Urban Area and Main Towns is in accordance with the site selection methodology. This comprises a sustainability appraisal of sites but also has regard to the findings of the Housing and Employment Land Availability Assessment (HELAA), the distribution of existing planning permissions (that are deliverable), progress with neighbourhood plans, a sequential approach to flood risk and the need to demonstrate exceptional circumstances to justify taking land out of the Green Belt. Exact allocations in the Main Towns can therefore range completely from 0% to 10%.

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.

30. National guidance is clear that plans should contribute to the achievement of sustainable development and be aspirational but deliverable. Also sufficient land should be made available in the right places at the right time to support growth, innovation and improved productivity. Planning policies should help create conditions for businesses to invest, expand and adapt and plans should recognise and address the specific locational requirement of different sectors.

31. With that in mind, the 2015 Issues and Options consultation asked a number of questions which related to the broad location of employment. It also asked for views on various options for the spatial distribution of development, including new employment, throughout the Borough. The Statement of Consultation outlines the key findings from that consultation while the Summary of Responses offers more detail. The spatial distribution of employment sites then took those findings and comments into consideration.

32. The Issues and Options consultation formed the basic broad locations for the spatial distraction of employment development. However for the

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9 DMBC4 Topic Paper 4: Housing
10 SDE46 Site Selection Methodology
11 SDEB45 Housing and Employment Land Availability Assessment
12 NPPF paragraph 8a page 5, paragraph 81 and 82, page 23
13 AE01 Doncaster Local Plan Issues and Options, questions 3, 4, 5 and 8 on pages 12-14 & 16-17
14 AE01 Doncaster Local Plan Issues and Options, section 4, pages 19-24
15 CSD10 Statement of Consultation, paragraphs 3.21 – 3.22, pages 14-16
16 AE02 Issues and Options Summary of Responses (2015), pages 21-31 & 39-47 and 55-56
locations to be successful and attract end users, they need to be located not only for the benefit of the communities in the borough, but also to be suitably located for the market. National guidance reiterates this stating that local authorities need to assess market demand using local data and market intelligence. Wider market signals relating to economic growth should also be used.\(^\text{17}\)

33. In order to ensure that the broad locations and then the sites themselves are attractive to the market, the HELAA\(^\text{18}\) assessment included a marketing workshop which was used to assess the sites\(^\text{19}\). The workshop included attendees who have and overarching strategic view of the employment land market across the region.

34. The Employment Land Review and the Employment Land Needs Assessment also addressed market demand\(^\text{20}\). They both demonstrate that historical demand in the borough has been close to junctions along the M18 and A1(M), particularly at junctions close to Balby (Main Urban Area) and Armthorpe, Adwick & Woodlands, Rossington and Thorne (all Main Towns). Indeed almost 70% of development was in those five areas with direct access to the motorway/strategic transport network. It is also shown that over half of the land developed in the Borough since 2000 was for distribution warehousing (56%) i.e. large sites. Historical demand shows that the market is looking for land suitable for large foot prints accessible from the Main Urban Area and Main Towns and therefore the broad distribution of employment sites is justified.

35. It is also justified that the broad spatial distribution for employment land should include Doncaster Sheffield Airport. The Airport is a major economic driver, not just for Doncaster, but also for the wider City Region. There is a support for the Airport in two key documents/strategies produced by the Sheffield City Region. The current SCR Strategic Economic Plan (SEP) (for the period 2015 – 2025) recognises that the airport is a catalyst for business development, inward investment and job creation with regard to logistics, engineering and associated aviation activities\(^\text{21}\). The SCR Integrated Infrastructure Plan (SCRIIP) sets out a number of Spatial Packages for the SCR Growth Areas which includes the Airport. The SCRIIP recognises that the provision of large industrial buildings will be key to supporting the growth of aviation and engineering businesses\(^\text{22}\).

36. The Council’s response to Q10.1a sets out further justification for accommodating land at Doncaster Sheffield Airport.

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\(^\text{17}\) OTH41 PPG, Housing and Economic Needs Assessments paragraph 026, Reference ID: 2a-026-20190220

\(^\text{18}\) SDEB4SHousing and Employment Land Availability Assessment

\(^\text{19}\) SDEB4SHousing and Employment Land Availability Assessment, section 7.3, pages 31-32

\(^\text{20}\) SDEB10 Employment Land Review, section 2.5, pages 15-16 and SDEB8 paragraph 2.59-2.64, pages 16-18 & paragraph 3.23-3.40, pages 27-32

\(^\text{21}\) AE17 Sheffield City Region Strategic Economic Plan (2015-2025), particularly section 5.2.3, page 31

\(^\text{22}\) AE18.1 and AE18.2, Sheffield City Region - Integrated Infrastructure Plan (Parts 1 and 2), particularly pages 5, 7, 18, 29, 27 and 52
37. Regarding the strategic road network, the Employment Land Review and the Employment Land Needs Assessment show that good access is necessary for sites to be successful, particularly large sites suitable for logistics uses where getting goods from one part of the country to another is key\textsuperscript{23}. Policy 13 builds on this recognise the that the strategic road network plays a key role on supporting the economic growth of the Borough and wider Sheffield City Region.

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

38. Local Plan (CSD3) Policy 2 proposes a 'Network of Centres' approach to guide decision making for retail, leisure, office, cultural and tourist developments in line with NPPF paragraph 85a (OTH39).

39. The Local Plan and its evidence base employs the definition of 'main town centre uses' given in the glossary to the NPPF.

40. The 'Network' is set out in Table 2 of the Local Plan.

41. Doncaster has a dispersed network of town, district and local centres where shops and other services and facilities are concentrated. The Local Plan's strategy and supporting policies aim to ensure that these centres remain vibrant, attractive and welcoming places in which to visit, shop, do business and enjoy leisure.

42. Each centre has its own distinct characteristics, strengths and opportunities and vary greatly in size and function. Each has been classified according to the role and function they perform.

43. The position of a centre within the network is based on a number of factors such as the size and type of shops and provision of other non-retail uses, catchment areas and proximity to other centres. The size and type of a retail, leisure and office or mixed-use proposal will determine which centre is the most appropriate place to locate it in. Policies set out in Chapter 8 of the Plan provide more detail.

44. Two main pieces of evidence support the categorisation of the Borough's centres.

45. The 2015 'Doncaster Retail, Leisure and Town Centres Study'\textsuperscript{24} undertook a performance analysis of Doncaster Town Centre and the smaller town centres of Mexborough and Thorne using a range of indicators of vitality and viability. Existing shopping patterns, and retail expenditure capacity, for convenience and comparison retail was also examined. Paragraphs 9.40-9.41 conclude with the recommendation that the current

\textsuperscript{23} SDEB10 Employment Land Review, section 2.5, pages 15-16 and SDEB8 paragraph 2.59-2.64, pages 16-18 
& paragraph 3.23-3.40, pages 27-32
\textsuperscript{24} SDEB40.1 Doncaster Retail, Leisure and Town Centres Study (2015)
designations of Doncaster town centre as the sub-regional centre, and Mexborough and Thorne as town centres be maintained.

46. Doncaster Town Centre is the main shopping and leisure destination in the Borough, serving a ‘sub-regional’ catchment area. Mexborough and Thorne are both important ‘town centres’ which provide a wide range of facilities serving large catchment areas.

47. The 2019 ‘Doncaster District and Local centres Survey’ provides evidence to support categorisation of Doncaster’s centres below the level of Town Centre.

48. District Centres are based on the size and range of shops and services they offer, but also there is an assumption about the size of the catchment they serve. Each of the district centres serve significant areas of the Borough and even parts of the adjoining districts e.g. Bawtry serves a number of rural villages in Bassetlaw and Mexborough serves some smaller villages in Rotherham. District centres contain a large group of shops together with supporting retail services, such as banks, estate agents (although it acknowledged that these services are reducing all the time with branch closes), cafés and restaurants along with community facilities such as health centres, libraries, and places of worship and leisure facilities. They can attract high street brands to collectively form a coherent shopping centre; either in a long linear street or a purpose built centre. Some of the district centres offer a significant amount of food shopping provision sold within larger supermarkets or superstores.

49. Local Centres are the next step down from District Centres in the retail hierarchy and are usually smaller in number of units, floor space and diversity of uses. Although some Local Centres contain more retail properties than certain District Centres, they do not contain the number or range of high street brands (such as Co-op or Sainsbury’s Local etc.) or larger format stores that District Centres have. This is because Local Centres serve a more local role, often serving walkable catchment areas and attract smaller independent shops and services. These Local Centres do play an equally important role serving local shopping needs, and social interaction to our communities. The more localised shops and services include post offices, newsagents, small convenience stores (top-up shops), pharmacies, hairdressers and estate agents. Local Centres also often contain important community facilities adding to that social connection such as medical practices, dentists, places of worship and public houses.

50. Next in the retail hierarchy are neighbourhood shopping parades which tend to be smaller again in size and range and generally contain 3 or 4+ units in a row. Some are purpose built with residential flats above. They tend to be small clusters or groups of shops and businesses that reside within existing residential areas, serving the everyday needs of the immediate neighbourhood.

25 SDEB38 Doncaster’s District and Local Centres Survey (2019)
51. A number of criteria were used to assess each centre including an analysis of the composition of each one. The size and type of shops and provision of other-non-retail uses, catchment areas and proximity of other centres and the consideration of the number of vacant units, the take up in levels of residential properties in the centres and the number of non-commercial uses within the area. Details of the survey work and resulting proposed boundary for each centre is given in the District and Local centres Survey26.

52. Table 3.3 in the addendum to the sustainability appraisal27 compares the distribution of homes proposed in policy 3 with the actual distribution of homes proposed in site specific policies in the Plan.

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?

53. For housing, Policy 3 of the Local Plan (CSD3), requires:
   • At least 50% of the Borough’s total housing, within the range of 6,805 – 7,315 homes, to be provided in the 'Doncaster Main Urban Area' (Tier 1);  
   • About 40% of the Borough’s total housing to be provided in the 'Main Towns' within individual ranges for each Main Town (Tier 2); and  
   • About 10% of the Borough’s total housing to be provided in the 'Service Towns and Larger Villages' (Tier 3) with targets for each settlement.

54. The Housing Topic Paper28 gives in detail a breakdown of housing supply over the Plan Period with comparisons against the settlement targets given in Policies 2 and 3 (including the ranges for settlements in the two highest settlement tiers of the Plan's Settlement Hierarchy).

55. Figure 46 on page 103 of the Topic Paper breaks down supply to show how the 15 year allocated supply is distributed within the 18 settlements of the levels 1-3 of the Settlement Hierarchy.

56. In summary:
   • 53.2% is distributed to the Doncaster Main Urban Areas  
   • 37.5% is distributed to the Main Towns  
   • 9.3% is distributed to the Service Towns and Villages

57. Housing supply in each individual settlement meets its settlement "target" given in detail in the tables in Section 7.9 of the Topic Paper, starting from page 84.

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26 SDEB38 Doncaster's District and Local Centres Survey (2019)
27 CSD7 (March 2020).
28 DMBC4 Topic Paper 4: Housing (2020), Section 7.9
58. The figures show that the broad spatial distribution of housing allocations (as part of wider actual housing supply) are in line with the spatial strategy given in policies 2 and 3.

59. For employment, Policy 3 supports development according to the following broad distribution (based on a summary of Policy 3’s table):

<table>
<thead>
<tr>
<th>Location</th>
<th>Logistics</th>
<th>Light Industry &amp; Manufacturing</th>
<th>Offices</th>
</tr>
</thead>
<tbody>
<tr>
<td>Doncaster Main Urban Area</td>
<td>Locations that can accommodate large buildings with good access to the M18/M180 motorways</td>
<td>Locations with good access to the M18/M180 motorways and strategic road network</td>
<td>Predominantly Doncaster town centre on mixed-use development sites</td>
</tr>
<tr>
<td>Main Towns</td>
<td>Sites within the multi-modal transport corridor around the Great Yorkshire Way/White Rose Way linking the urban centre to the Doncaster Sheffield Airport, including the urban centre, Lakeside, Rossington iPort, Bankwood Lane and the Airport</td>
<td>As Doncaster Main Urban Area Unity (Hatfield Power Park and associated business parks)</td>
<td>Mexborough and Thorne town centres</td>
</tr>
<tr>
<td>Service Towns and Larger Villages</td>
<td>A1(M)-A19 corridor and the wider strategic transport network which will release the long term potential of the Carcroft employment area</td>
<td>Doncaster Sheffield Airport (aviation related uses)</td>
<td>District and Local Centres</td>
</tr>
</tbody>
</table>

Logistics:
- Road, rail and air related logistics.
- On line retail distribution.

Light Industry & Manufacturing:
- Rail and manufacturing, particularly advanced manufacturing.
- Local employment (including small scale distribution).
- Low carbon and “green industries” (including renewable energy).

Offices:
- Co-located with other town centre uses (including training and education facilities, hotels, health centres etc.).
Small existing sites to support the rural economy
Sites alongside Doncaster Sheffield Airport

60. Policy 4 then allocates sites in line with that approach. In brief the sites are within:

- the Main Urban Area (site refs 092 Balby Carr and 258 Middle Bank);
- the Main Towns of Thorne & Moorends (site ref 001 Junction 6 M18, Thorne North) and Rossington (site ref 1032 Bankwood Lane, Rossington);
- the service towns and larger villages of Carcroft-Skellow (site ref 441 Land at Carcroft Common, Carcroft) and Auckley-Hayfield Green (site ref 941 RHADS Site 1, Phase 4 Business Park).

61. The further detail is as follows and shows that the employment allocations do have regard to the aims in Policy 2 and 3:

- Main Urban Area – both Site 092 and Site 258 are capable of accommodating local employment (including small scale distribution) as well as light industry and manufacturing. Both sites has good access to the M18/M180 motorways and strategic road network through the A6182 – White Rose Way and Great Yorkshire Way;

- Main Towns – both Site 001 (Thorne) and 1032 (Rossington). Site 001 is suitable for larger scale logistics uses and also light industry and manufacturing. It is capable of accommodating large buildings and has good access to the M18/M180 motorway. While Site 1032 is within an existing employment site and is suitable for local employment (including small scale distribution) as well as light industry and manufacturing. It has access to the M18/M180 motorways and strategic road network through the A6182 Great Yorkshire Way;

- Service towns and larger villages - both Site 441 and 941 are adjacent to service towns and larger villages. Site 441 is suitable for local employment (including small scale distribution) as well as light industry and manufacturing and is within the A1(M)-A19 corridor. Site 941 is close to Auckley-Hayfield Green but importantly supports the Doncaster Sheffield Airport and Policy 7. It is suitable for logistics uses as well as light industry and manufacturing.

62. Further information on each allocation is within the Housing and Employment Site Selection Methodology and Results Report\(^{29}\).

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\(^{29}\) SDEB46 Site Selection Methodology, section 9.4 pages 209-211
63. It is not considered that any main modifications are required to ensure that the Plan is unambiguous and internally consistent in this respect.

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

64. Local Plan (CSD3) Policy 2, as submitted for examination, was proposed as a core strategic policy which summarised, in one place, the Plan’s overall strategy and settlement hierarchy. The Council considered it helpful to have one policy that could accessible to the reader of the Plan that directly summarises the overall strategy for development in the Borough and set the basis for how new land allocations have been identified to meet the Borough’s development needs.

65. The NPPF (OTH39) requires that plans are based on an 'appropriate strategy'. However, the NPPF does not require such strategy to be presented in one policy. Indeed Section 19(1B) - (1E) of the Planning and Compulsory Purchase Act 2004 (OTH23) sets out that each local planning authority must identify their strategic priorities and have policies to address these in their development plan documents taken as a whole.

66. The Council considered Policy 2 was sound in the form submitted for examination. However, in response to the Inspector's Preliminary Questions (INSP2, PQ14) changes are proposed to remove parts of Policy 2 which are arguably not relevant to development management decisions. The deleted policy text would be retained as an explanatory text box, formatted as per the Local Plan's Vision on pages 14 and 15 of the Plan, and titled 'Spatial Strategy'. Policy 2 would be re-named as 'Settlement Hierarchy' and would present development management policy for the various "levels" of the proposed hierarchy.

67. The Council is content to suggest this change if it is considered it would make Policy 2 more clearly written and unambiguous so it is evident how a decision maker should react to development proposals; and that the Policy would be more focussed, concise and as accessible as possible.

68. The full proposed change is given at DMBC 15 (pages 1-3).

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?

69. In terms of the broad amounts of development proposed in the various settlements in Local Plan (CSD3) Policy 3, this is discussed, and justified, in detail in response to Matter 3, Question 3.2.

30 OTH39 NPPF 16(d) and OTH41 PPG Paragraph 002 ID:61-002-20190315
70. As discussed in response to the Inspector's Preliminary Question (INSP2) PQ15, the table in Policy 3 which sets out the distribution of growth is primarily provided to explain and justify the distribution of growth proposed through allocations in the Plan.

71. However, the figures provided for the number of homes in ‘Doncaster Main Urban Area’, the ‘Main Towns’ and the ‘Service Towns and Larger Villages’ also provide a context for development management decisions in terms of assessing overall need for housing in a particular settlement. The figures given would become relevant to assessing individual planning applications where, for example, delivery of housing in an individual settlement was shown to be significantly exceeding or under-achieving the Local Plan settlement ‘target/ requirement’. In such situations, this would inform planning decisions balancing housing need against other factors such as compliance with other Plan policies and harm to/benefit from other material considerations.

72. The latter part of Policy 3 which is relevant to 14 Defined Villages which are surrounded by ‘Countryside’, as defined in Part 5 of Policy 2, is development management policy to be read in conjunction with the last part of Part 5 of Policy 2. This is relevant where, in exceptional circumstances (as defined in Policy 2), and subject to the demonstration of clear local community support (as defined in Policy 2), residential development in appropriate locations (as defined in Policy 2) may be supported in the ‘Countryside’ on land adjacent to the development limit of a Defined Village. This is discussed in more detail in response to Matter 7, Question 7.1.