1. **Introduction**

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

- Matter 3: Strategic Approach

1.2. Framecourt 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 Framecourt Homes comments upon the submission version of the Doncaster Local Plan, dated September 2019.

1.4. Framecourt 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. Framecourt 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. Framecourt Homes have raised significant concerns relating to the overall need for development proposed in Policy 3, and these are raised in Matter 2. Framecourt 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. Framecourt Homes consider that there should be sufficient provision for new homes in the Service Towns and Villages to reflect their scale and function. These are sustainable towns and villages which also serve their hinterland.

2.5. The policy as currently expressed lacks consistency and clarity. This is not aided through the use of a range within the policy requirement. Framecourt 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.

Part B

2.6. As considered in Matter 2, Framecourt 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. Framecourt 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

2.7. Framecourt Homes has no specific comment in relation to this issue.

Part D

2.8. Framecourt Homes has no specific comment in relation to this issue.

2.9. Framecourt 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. Framecourt Homes consider that sufficient growth should be supported in the Service Towns, with particular regard to Tickhill, to ensure that needs can be met where they arise, and reflecting the role and function of the settlement.

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?

2.12. As considered in response to Matter 2, and in response to Q3.2, Framecourt 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.

2.13. 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.

2.14. Framecourt Homes is concerned that there are insufficient housing allocations in Tickhill. Policy 3 indicates the settlement should be accommodating at least 165 homes. The current level of allocation of 74 units at Site 1028 does not reflect the role, and function of the settlement. Framecourt Homes is concerned that the greenfield Site 1028 does not have access, it requires the demolition of a dwelling, and acquisition of garages, and that overcoming this constraint will have viability implications, alongside addressing air quality and noise issues associated with the presence of the A1(M). The site is identified as having a capacity of 74 dwellings which is not considered to be realistic in the light of the site size, which would
further reduce the quantum of development within Tickhill. Further housing allocations are required in Tickhill to ensure consistency with Policy 2 and 3.

2.15. Framecourt Homes consider that the Plan should be modified and the following sites should be allocated:

- Site 1019, Apy Hill, is a part brownfield site, which performs well in the sustainability appraisal. As stated in response to Matter 4, Q4.2 the site is a part brownfield site which should be given first consideration when releasing Green Belt Sites. Site 1019 should be allocated in order to address the housing shortfall within the settlement either instead of site 1028 or in addition to Site 1028 (with a reduced capacity).

2.16. Framecourt 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 Tickhill.

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

2.17. Framecourt 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?

2.18. Framecourt 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.

2.19. 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.
2.20. 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. Framecourt 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.

2.21. Framecourt Homes are especially concerned about the deficit in Tickhill, particularly in the light of deliverability concerns pertaining to the allocated site 1028. Framecourt Homes consider further allocations should be made. The approach taken and lack of consistency internally within the document undermine the effectiveness of the policy.

**Proposed Change**

2.22. 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.