HEARING STATEMENT FOR THE EXAMINATION IN PUBLIC:
DONCASTER LOCAL PLAN

MATTER 3: STRATEGIC APPROACH

PREPARED ON BEHALF OF HALLAM LAND MANAGEMENT LTD AND HENRY BOOT DEVELOPMENTS

SEPTEMBER 2020

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1. INTRODUCTION

1.1. This Statement is prepared by Freeths LLP on behalf of our client Hallam Land Management Ltd and Henry Boot Developments (“HLM/HBD”) and is submitted as evidence as part of the examination into the Doncaster Local Plan (“DLP”). HLM/HBD has made detailed representations on a number of policies at the Regulation 19 stage (ref: 05283) and is promoting land to the north of Adwick & Woodlands for residential and employment development. This land is not proposed for allocation in the Submission Version of the DLP.

1.2. This Statement relates to Matter 3 ‘Strategic Approach’ of the ‘Matters, Issues and Questions’ note prepared by the Inspector (INSP4) and forming the basis of the Examination Hearings.

2. Q.3.2 – IS THE BROAD SPATIAL DISTRIBUTION OF DEVELOPMENT PROPOSED IN POLICIES 2 AND 3 JUSTIFIED?

2.1. No. Our concern relates to part b) of the question, the method for distributing new homes around each of the individual Main Towns and Service Towns and Villages.

2.2. Within the settlement hierarchy of the spatial strategy the distribution between settlements has been determined on existing household split percentages and therefore a ‘pro-rata’ approach.

2.3. There are two principal issues with the approach taken. Firstly the distribution within a settlement tier has no account for the individual sustainability characteristics of the particular settlements. At the Main Towns level of the hierarchy the ‘rankings’ table1 of the updated Settlement Audit shows a relatively modest range of scores between the seven settlements, with the highest scoring settlement Conisbrough and Denaby awarded 122 and the lowest scoring settlements Dunscoft, Dunsville, Hatfield, and Stainforth and Armthorpe scoring just two less with 10. It appears from the DLP and

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1 Para 4.3.1 of SDEB2.2
2 Note Edlington also scores 12 but is a ‘Service Town and Village’
the supporting evidence that the sustainability credentials of each settlement have been used only to group settlements within particular tiers of the hierarchy and have played no further part in informing the level of development attributed to each settlement. If this is the case and DMBC are stating that effectively all settlements within a level of a hierarchy (taking Main Towns as an example) are judged to perform to a sustainability level where it is difficult to differentiate based on such factors, then why has the strategy departed from that of the adopted Core Strategy where ‘Principal Towns’ were all given the same development range (646-923)³?

2.4. Again taking the Main Towns tier as an example there are differences to be drawn between the settlements. For example Armsthorpe and Rossington are the only two settlements within this tier that do not have a train station, which is one of the six ‘primary’ sustainability services in the Settlement Audit Assessment. It appears this has played no part in how development has been allocated.

2.5. Secondly, there is a clear potential for settlements to be disadvantaged by this ‘pro rata’ approach based on past development rates. Specifically if a settlement has experienced significant housing growth over the past number of years, then this will boost further growth within the Plan period. Equally, settlements that have had restricted or limited growth will continue to be constrained by the approach.

2.6. Policy 3 sets out the overall housing requirement figure for the Plan but also has a table which proposes the range of development for the Main Urban Area and the Main Towns and a single figure for Service Towns and Larger Villages. In response to PQ15 which seeks to understand the purpose of this, DMBC has advised that the primary purpose is to “explain and justify the distribution of growth proposed through allocations in the Plan”. We fail to see how the table achieves this. It sets out a distribution of growth but there is no clear explanation or justification as to how this has been derived. Further, when you analyse the amount of development that is being directed to particular settlements, the figures quoted in Policy 3 appear somewhat redundant. The table below demonstrates that of the 7 Main Towns, only 3 settlements (Adwick Woodlands, Conisbrough & Denaby and Thorne & Moorends) have permissions and allocations for development within the range specified by Policy 3.

³ Policy CS2 of the Core Strategy.
Table 1. – Main Towns

<table>
<thead>
<tr>
<th>Settlement</th>
<th>Proposed Range</th>
<th>Actual No of Dwellings Granted Permission of Allocated</th>
<th>Variation (from top of range)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adwick Woodlands</td>
<td>255-765</td>
<td>482</td>
<td>-283</td>
</tr>
<tr>
<td>Armsthorpe</td>
<td>420-930</td>
<td>1049</td>
<td>+119</td>
</tr>
<tr>
<td>Conisbrough &amp; Denaby</td>
<td>465-975</td>
<td>528</td>
<td>-447</td>
</tr>
<tr>
<td>Dunsclroft, Dunsville, Hatfield &amp; Stainforth</td>
<td>575-1085</td>
<td>1828</td>
<td>+743</td>
</tr>
<tr>
<td>Mexborough</td>
<td>475-985</td>
<td>310</td>
<td>-675</td>
</tr>
<tr>
<td>Rossington</td>
<td>385-895</td>
<td>1142</td>
<td>+247</td>
</tr>
<tr>
<td>Thorne &amp; Moorends</td>
<td>510-1020</td>
<td>736</td>
<td>-284</td>
</tr>
</tbody>
</table>

2.7. The fact that the amount of housing that will actually be directed to these settlements (acknowledging that this could further vary through windfalls) bears little relationship to the ranges expressed in the policy, causes confusion. It would be a legitimate expectation of anyone reading the Plan to think that development within the Main Towns would be delivered within the parameters of Policy 3, but this is not the case. The Service Towns and Larger Villages tier is specified as a single figure, albeit it is noted that they are not expressed as ‘minimum’ requirements. Askern has a requirement of 165 and is proposed for 691 (+526) and Edlington has a requirement of 230 and is proposed for 665 and is further evidence that housing delivery will bear little resemblance to the figures set out in Policy 3.

2.8. It is noted that as part of their response to PQ15 DMBC advise:

“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.”

2.9. We would question how effective this approach will be in reality given that there are numerous settlements that already exceed the limits specified by Policy 3.

2.10. We conclude that Policy 3 is not justified and further evidence needs to be provided to support the spatial distribution of development. Reliance on a pro-rata distribution is not considered sufficient. Further, any spatial distribution within Policy 3 needs to be consistent with decisions on the quantum of development that is to be directed to settlements. This is not to say that decisions on allocations inform the strategy, this would not be appropriate, but the strategy has to reflect the reality of where development is proposed.