Examination of the Doncaster Local Plan

Harworth Group Plc
Rossington (Site Ref 247) (Representor Ref 05205)
Conisbrough and Denaby (Site Ref 1035) (Representor Ref 05205)

Hearing Statement
in relation to
Matter 3 – Strategic Approach

September 2020
Introduction / Context

1. This Statement is submitted on behalf of Harworth Group Plc (‘Harworth’), specifically in relation to land in which it has an interest at Rossington Colliery, and Denaby Main.

2. This Statement provides Harworth’s response to the Inspector’s Matters, Issues and Questions (INSP4) for consideration during the forthcoming hearing sessions. Harworth intend to participate in the hearing session in relation to Matter 3.

3. This Statement relates to Matter 3 regarding ‘Strategic Approach’ in particular, the following questions which are replicated ahead of Harworth’s response.

Question 3.2

*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.

Harworth Response

4. Harworth considers that the broad spatial distribution of development proposed in Policies 2 and 3 is not justified.

5. Harworth supports the distribution of a substantial proportion of the new homes to the Main Towns to meet housing need, facilitate regeneration and support economic growth.

6. Harworth objects to the spatial distribution of employment sites and disputes that new employment sites are distributed to locations accessible from the Main Towns (Policy 2), particularly those to the west of the Borough including Conisbrough and Denaby.

7. Whilst Policy 2 suggests that employment allocations will be focused in locations accessible from the Main Towns, this is not achieved by Policy 3 which steers employment allocations, including those for ‘local employment (including small scale distribution)’, only to sites with ‘good access to the M18/M180 motorways and strategic road network’.

8. The objectives to achieve sustainable development and inclusive economic growth etc do not solely depend upon the allocation of major new employment sites in locations with good motorway access.

9. Whilst Harworth fully advocates the allocation of large scale and strategically located sites (e.g. Bradholme Farm), it is considered that the spatial distribution is inappropriately skewed towards sites at the east of the
Borough which are not necessarily accessible from the Main Towns at the west of the Borough and do not serve to provide local employment opportunities or support regeneration in those locations.

10. The implication of this strategic approach is that there are no allocations made to accommodate relatively small-scale development for logistics, light industry and manufacturing use at the Main Towns, particularly in the west of the Borough. This approach is not justified when considered against reasonable alternatives and is not positively prepared insofar as it does not meet the need for local employment and regeneration in the Main Towns to the west of the Borough.

11. Harworth therefore considers that Policy 3 is not sound. As per our preceding representations, the strategic aim and detail of Policy 3 needs to be changed to allow allocation of sites at the Main Towns for light industry and manufacturing use (including ‘small scale distribution’) specifically in locations that are within and accessible to the existing town. Our suggested change is underlined in the Policy 3 table extract below:

<table>
<thead>
<tr>
<th>Location</th>
<th>Employment</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>Light Industry &amp; Manufacturing</strong></td>
</tr>
<tr>
<td></td>
<td>Rail and manufacturing, particularly advanced manufacturing</td>
</tr>
<tr>
<td></td>
<td>Local employment (including small scale distribution).</td>
</tr>
<tr>
<td></td>
<td>Low carbon and “green industries” (including renewable energy)</td>
</tr>
<tr>
<td><strong>Main Towns</strong></td>
<td>As Doncaster Main Urban Area.</td>
</tr>
<tr>
<td></td>
<td>Locations within and accessible to the existing town</td>
</tr>
<tr>
<td></td>
<td>Unity (Hatfield Power Park and associated business parks)</td>
</tr>
</tbody>
</table>

12. This change is necessary to ensure that ‘light industry and manufacturing’ to provide ‘local employment (including small scale distribution)’ can be provided in Main Town locations which are attractive to the market at a more local level (i.e. relative to the larger-scale allocations of regional significance) and support the inclusive economic growth and regeneration of the Main Towns.

**Question 3.3**

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?

**Harworth Response**

**Policy 4 Employment Sites**

13. Given our response to Question 3.2 (above), it follows that the employment allocations in policy 4 are not justified when considered against reasonable alternatives to deliver an appropriate spatial distribution of development.

14. On the basis of a strategic change being made within Policies 2 and 3 and there being a requirement to identify additional or alternative sites to achieve a corresponding distribution of development, Harworth suggests that Site 1035 be favourably considered given the positive contribution its development will make to local employment, inclusive economic growth and regeneration at the Main Town of Consibrough and Denaby.
15. Inclusion of this site (in part) as an employment allocation would constitute a main modification that is required to ensure the Plan is consistent in this respect.

16. For reference, Site 1035 is promoted by Harworth for employment (in part) and housing (in part) given its location adjacent to both existing employment and housing areas.

**Policy 6 Housing Sites**

17. With regard to Policy 6 (housing allocations) Harworth considers that this is not justified when considered against reasonable alternatives to deliver an appropriate spatial distribution of development, in particular:

   i. The distribution of development resultant from the proposed allocations at Conisbrough and Denaby.

   ii. The quantum of dwelling numbers allocated at Rossington Sites 662 and 247.

**Conisbrough and Denaby**

18. Whilst Harworth has no objection to the overall quantum of housing development to be allocated at sites in Conisbrough and Denaby it considers that the proposed allocation sites are not the most appropriate when considered against reasonable alternatives, including the allocation of Site 1035 (in part) for housing development.

19. Please see our Statement in response to Matter 4 Green Belt and Matter 13 Natural and Built Environment for further consideration of this.

**Rossington**

20. Harworth supports the broad distribution of housing development, including the allocation of a substantial proportion of housing at Rossington.

21. In particular, Harworth supports the allocation of Site 662 and Site 247 for housing development, and notes that the boundary alignment and resultant land area for Site 247 has now been corrected to 14.1 ha (see Council’s suggested main modification1,2).

22. However, the indicative capacity of these sites is not considered to be justified based on the evidence available. As per our preceding representations it is demonstrated that Site 662 may be fully developed in a shorter timeframe than indicated in Table H1(G), whilst Site 247 which forms an extension to Site 662 may deliver a greater number of dwellings than indicated.

23. Indicative masterplanning work undertaken demonstrates that Site 247 can accommodate 406 dwellings (across 14.1 ha), which is in excess of the 349 units indicated in Table H2(G) (as amended by the Council’s suggested main modification). Harworth supports the increase to 349 from 230 as stated in the publication version of the Plan, but considers that this may still fail to make full and effective use of the former colliery land as per the revised wording of paragraph 16.1291.

24. Accordingly, Table H1(G) and Table H2(G) should be amended as per our preceding representations for accuracy and to ensure full and effective use of land that will assist in achieving the strategic aims and spatial distribution of development.

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2 DMBC16 page 11