3.1 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?

3.1.1 We are broadly supportive of Policy 1 which is consistent with the aims of the NPPF to deliver sustainable development. It is positive that Doncaster have sought to align with this aim through Policy 1 and development options should be brought forward in this context.

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.

3.2.1 In respect of question 3.2 a) we agree with focusing new homes in the Main Urban Areas to ensure the plan is prepared with the objective of contributing to the achievement of sustainable development. However the 50% does not go far enough accounting for the intrinsic nature of the borough. The plan as currently written is unsound and should be edited as explained below in the interests of justified plan making and consistency with national policies.

3.2.2 Whilst we support the broad spatial distribution of development outlined within policies 2 and 3, we maintain that higher levels of growth should be directed to the Main Urban Area. On a pure population basis Doncaster's Main Urban Area is by far the dominant settlement and largest in this part of the Sheffield City Region with a population of 158,141 (2011 Census) - the next largest settlement being Thorne at 17,295 (2011 Census) with the remainder involving a number of smaller dispersed settlements beyond. The reality is that Doncaster town is the foremost settlement within the local authority, with excellent sustainable transport links (including East Coast Mainline), acting as a hub from which all other settlements support (see figure 1 below).
3.2.3 There is clearly a need for a significant increase in housing delivery in Doncaster’s Main Urban Area in line with both existing population demographics and our comments at Matter 2 and given the ability to deliver sustainable growth, wider geographical constraints of the District - in terms of flood risk and other key constraints. It therefore follows that the Main Urban Area should be the primary focus for sustainable growth, in line with Policy 1 of the Local Plan as submitted and national policy, maximising on infrastructure and service provision in the Main Urban Area.

3.2.4 With reference to the ‘at least’ 50% figure of homes identified to be delivered in the Main Urban Area there are two points to be made.
3.2.5 Firstly, it is essential that any percentage is taken as a minimum. This should be reinforced throughout the Local Plan to ensure delivery on sites in addition to those identified through the Local Plan allocations, accounting for lapses and ensuring that growth is truly deliverable and developable. We have significant concerns over the sites which have been selected not fulfilling the deliverability and developability criteria. A number of the sites selected are unviable. This is set out in detail within our comments relating to Matter 1 and 5.

3.2.6 Secondly, on a demographic basis it is clear that Doncaster’s Main Urban Area makes up for the largest town in the district, 9x larger than the next largest settlement of Thorne. Applying a higher percentage would ensure development continues in the most sustainable locations in line with the NPPF.

3.2.7 Our suggested modification is to alter the ‘at least’ 65% for these reasons.

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?

3.3.1 No, as set out in our response to question 3.2 we believe a higher spatial percentage for Doncaster’s Main Urban Area should be adopted. Our suggested Main modification is to alter ‘at least’ 50% to ‘at least’ 65%.

3.5 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?

3.5.1 In conjunction with the settlement hierarchy outlined in Draft Policy 2, Draft Policy 3 goes on to state the specific distribution of development. With specific consideration to the Main Urban Area of Doncaster, it states at least 50% of the Borough’s total housing should be focused within it. We must reiterate that the policy should clearly state at least 65% as a minimum figure.

3.5.2 Within Policy 3, DMBC have outlined minimum and maximum housing requirements which essentially distributes the identified required growth across each settlement according to its place in the Settlement Hierarchy. We believe this approach is misguided and is missing an opportunity in terms of those areas of land which have been considered for development for many years. The incorporation of a upper and lower limit for housing numbers is prohibitive and is likely to have a detrimental impact on housing delivery in the longer term – stifling those areas where the housing market is healthy and delivery is able to proceed at pace.
3.5.3 Taking Armthorpe as an example, Armthorpe is designated as a Main Town, and has a housing target of 420 – 930 dwellings c.7% of the overall allocated borough supply. This is too broad a range. We have noted previously how DMBC state that the entirety of this identified requirement is to be met through allocations made through the Neighbourhood Plan. Yet in applying a maximum target of 930 dwellings in Armthorpe it fails to take account of its strategic relationship with Doncaster and suitability of land adjacent to the Main Urban Area of Doncaster.

3.5.4 Significant areas of land, including the Land at Grange Farm, which are otherwise sustainably located and entirely deliverable, will face additional, unnecessary restrictions, as proven by the planning history of the site thus far.

3.5.5 Setting a minimum figure only, with no ceiling would readdress he soundness of the plan, in accordance with paragraph 60 of the NPPF.