I. **Introduction**

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

- Matter 3: Strategic Approach

1.2. Priority Space 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 Priority Space comments upon the submission version of the Doncaster Local Plan, dated September 2019.

1.4. Priority Space 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. Priority Space 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. Priority Space has raised significant concerns relating to the overall need for development proposed in Policy 3, and these are raised in Matter 2. Priority Space 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. Priority Space considers that the distribution across the Main Towns should not just reflect the current size of the town but also reflect their location with respect to the wider economic growth aspirations of the Borough. Within this context, Carcroft and Skellow is of a similar scale to the Main Towns, and should be identified as such to recognise the provision of existing employment parks, its location on the A1(M) and its focus on regeneration and growth. Within this overall strategic approach, new allocations should made and informed by an adequate Level 2 SFRA, or appropriate flood risk assessment.

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. Priority Space 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. As noted above, Priority Space consider that allocations should be made in Defined Villages to ensure that land can come forward where it is needed.

Part B

2.6. As considered in Matter 2, Priority Space 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. Priority Space 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. Priority Space consider that the status of, and housing requirement for Carcroft-Skellow should be revised to account for its growth potential and to support its regeneration and renewal, consistent with the approach set out in response to Q3.2 a

2.7. Part C

2.8. Priority Space have no specific comment in relation to this issue.
Part D

2.9. Priority Space have no specific comment in relation to this issue.

2.10. **Priority Space** 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. **Priority Space** consider that further growth should be supported in Carcroft, responding to current employment and future economic growth potential.

**Q 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?**

2.11. As considered in response to Matter 2, and in response to Q 3.2, **Priority Space** 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.

2.12. 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 Moorsends, Sprotbrough, Tickhill and Bawtry.

2.13. **Priority Space** would also like to highlight that Policy 2 indicates that housing allocations to accommodate economic led housing growth should be directed to the most sustainable locations and deliverable sites in the Doncaster Main Urban Area and Main Towns in
accordance with the growth ranges set out in Policy 2 and in accordance with a sequential approach to flood risk.

2.14. As considered under Q.3.2 and our earlier representations Priority Space consider that the scale of housing growth at Carcroft and Skellow should be reviewed in light of the level of existing employment, the future employment growth potential and the existing scale of the settlement. The settlement is similar in scale to Main Towns such as Adwick and Woodlands, with employment allocations at the scale of those within other Main Towns and Doncaster Main Urban Area. The role and function of the settlement should be reviewed in line with the regeneration and economic growth potential. Priority Space consider further allocations should be made having regard to the findings of Level 2 SFRA, or appropriate Flood risk assessments, informed by the Sustainability Appraisal [NPPG – ID 01-22].

2.15. Priority space consider that the Plan should be modified and the following site should be allocated.

- Site 273, Askern Road, Carcroft. The site is well located in terms of proximity to services and facilities, including access to employment and performs well in the sustainability appraisal. An updated Flood Risk and Drainage assessment, including a sequential test has been prepared and demonstrates that the site has not flooded for a significant period of time. Further it demonstrates that in the event of a breach of flood defences, water would be displaced over lower lying land, and would not result in flood risk to existing properties. Priority Space have engaged with the Environment Agency and the Environment Agency have confirmed that it does not object to the site coming forward.

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

2.16. Priority Space has no specific comment in relation to this issue.
2.17. Priority Space 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.

2.18. 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.

2.19. 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. Priority Space 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.

**Proposed Change**

2.20. 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.
- Review the role and function of Carcroft to reflect its location and growth potential.
- Allocate additional sites to ensure that the spatial strategy proposed is capable of being delivered, including Site 273.