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.

In principle, this broad spatial distribution approach is Justified as, for sustainability reasons, it is appropriate to seek to accommodate significant proportion of growth in and around the main urban areas and towns where there is good access to public transport and services. However, in addition, it is also important to seek to support the service towns and villages where they can accommodate the growth that would seek to support and bolster local services, many of which are in decline in rural areas. These Service Towns and Villages have been selected by the Council because:

“These settlements serve as important local centres, with a sustainable level of provision to support themselves and other small settlements which are close by, and therefore can accommodate a small amount of housing growth within them”.

Paragraph 59 of the NPPF confirms that to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The Council has identified a need to deliver new homes at the service towns and villages and the Plan can only be Sound if the Local Plan achieves that by identifying sufficient sites.

Further, paragraph 68 of the NPPF confirms that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should: identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. Many such sites are likely to be best found at locations around the smaller Service Towns and Villages and, therefore, it is important that the Local Plan specifically identifies sites at the appropriate settlements to meet these requirements. By way of an example, this is not achieved at Tickhill which the Council note is “one of the better scoring Service Towns and Villages, although it scores moderately when compared to all settlements in the top 3 tiers. There are two primary schools, a GP and pharmacy”.

Finally, paragraph 77 of the NPPF is very clear that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby. This is not achieved at Tickhill.
**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?**

In paragraph 1.2.8 of the Housing Topic Paper, the Council identify that ‘a challenge for the Local Plan is to ensure there is a good spread of housing across the Borough and to the places it is needed, in a way which is in-keeping with, and proportionate to, the settlements themselves’. The Topic Paper (4.3.4) goes on to recognise that the Local Plan has sought to allocate as much land as possible in the places it is required by utilising as many brownfield and urban opportunities as possible (see section 7). ‘In a number of locations, this has failed to deliver a suitable amount of housing to help meet respective settlement housing requirements, given how tightly drawn the Green Belt is. In such locations, the possibility of Green Belt land being utilised has been explored, with exceptional circumstances being demonstrated in locations in Barnburgh – Harlington, Bawtry, Carcroft – Skellow, Conisbrough, the Main Urban Area and Tickhill to justify Green Belt release’.

Paragraph 4.4.12 of the Topic paper therefore confirms that allocations have been made ‘insofar as is possible to meet the individual settlement requirements and maintain the settlement hierarchy, strategy and proposed distribution’. However, by way of an example, the Local Plan does not allocate anything like sufficient land to meet the identified requirement at Tickhill, despite the Green Belt assessment noting that land could be released from the Green Belt in the south. Figure 42 of the Topic Paper acknowledges this, by confirming that “Tickhill has a housing target of 165 units, and will deliver under this by 91 units due to constraints in the area. It will deliver 0.6% of the overall borough supply 2018 – 33”. This is also noted in Table 3 of the Sustainability Appraisal Addendum but paragraph 3.3.6 of the Addendum (second bullet) fails to provide any credible and robust reason why sites at Tickhill cannot be found to meet the Spatial Objective and aims in Policies 2 and 3.

To further exacerbate this failure to deliver new houses where they are required and where it would be sustainable, it is noted from Figure 23 of the Housing Topic Paper that, for example, Tickhill is only one of two settlements where there are no outstanding permissions to deliver new homes in the short term. This is recognised by the Council in paragraph 7.9.4 where it is stated that:

“In these settlements, supply via permissions is either more limited or there are no permissions to count towards the allocated supply (Sprotbrough and Tickhill), which makes finding new site allocations imperative if housing is to be delivered in the locations set out in the settlement hierarchy, in the interest of meeting local needs and providing a balanced spatial approach”.

And yet, for example, the Council concludes in 7.9.14 that “Tickhill is also constrained by Green Belt, as well as a number of proposed sites also having access problems. As such, only one site has been allocated which will deliver 45% of the settlements housing target of 165. No other suitable sites have been found locally”. The Council acknowledges, in paragraph 7.15.3 of the Housing Topic Paper, that Green Belt has only been released where there is clear justification to do so, and only as a last resort, where there are not suitable alternatives in the settlements with allocations. “In the case of Barnburgh – Harlington, Carcroft – Skellow, Sprotbrough and Tickhill, there are very little, if any permissions, and no suitable brownfield sites, and so Green Belt is the only realistic source of housing land in these locations”. In this context, the access ‘problems’ referred to in the Council’s assessment for Tickhill, for example, should have been fully tested to find a solution for land to the south of Tickhill (no evidence provided and no engagement with the land owner at all), which is essential when finding allocations is ‘imperative’.
As such, while the Council claims (paragraph 7.8.3) that the distribution strategy is being met because 15% of the total supply in the years 2018 – 33 will be in the Service Towns and Villages, it is recognised that this is because ‘a number of settlements in this tier are delivering over their target and will be capped in allocation calculations for the fifteen-year period’. Such an approach does not appropriately meet the spatial distribution and aims of Policies 2 and 3 because it does not provide a balanced housing delivery which would support all service towns and villages. As such, the Plan is not sustainable overall and fails to achieve the objectives of the Plan and the NPPF.

The overall Spatial distribution is Justified, but the Local Plan fails to appropriately meet that Spatial Distribution Strategy and fails to meet the aims set out in Policies 2&3. It could be made Sound if modifications were made to identify additional land at the settlements where the requirement is not currently met such as to the south of Tickhill.