Hearing Statement – Matter 3

Doncaster Local Plan

On behalf of Strata Homes

August 2020
1. **Introduction**

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

   - Matter 3: Strategic Approach

1.2. Strata Homes 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 Strata Homes comments upon the submission version of the Doncaster Local Plan, dated September 2019.

1.4. Strata Homes 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. Strata Homes 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. Strata Homes have raised significant concerns relating to the overall need for development proposed in Policy 3, and these are raised in Matter 2. Strata Homes 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. Policy 2 and 3 seek to ensure at least 50% of the Borough’s total housing should be within Doncaster MUA. This equates to the provision of at least 9,200 against the upper end requirement of 18,400. The Housing Policy Topic Paper refers to a residual requirement of 882 dpa over the remaining 17 years (50% of 14,994 equates to 7,497). However, the target when expressed in numbers within Policy 3 is 6,805 to 7,315. Table 3.3 in CSD 7 confirms that the target range established within Policy 3 for the MUA falls below 50% of the Boroughs total housing supply.

2.5. Strata Homes therefore considers that there is a need to review the quantum of housing expressed within Policy 2 and 3 to ensure the policies themselves are consistent. As indicated in response to Q3.4, Strata Homes consider there is a need for further allocations within Doncaster MUA to ensure that the Plan is capable of delivering its spatial strategy and ensuring the delivery of at least 50% of housing within the MUA. The policy, as currently expressed, lacks consistency and clarity. This is not aided through the use of a range within the policy requirement. Strata Homes considered the implications of using a range under Matter 2, and consider that this approach is not justified in the context of the level of economic growth being sought within the Plan.

2.6. The policy as currently expressed lacks consistency and clarity. This is not aided through the use of a range within the policy requirement. Strata Homes 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.

Part B

2.7. As considered in Matter 2, Strata Homes 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. Strata Homes 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.
2.8. Part C

2.9. Strata Homes has no specific comment in relation to this issue.

Part D

2.10. Strata Homes has no specific comment in relation to this issue

2.11. Strata Homes 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.

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?

2.12. As considered in response to Matter 2, and in response to Q3.2, Strata Homes 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.

2.13. 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 Moorends, Sprotbrough, Tickhill and Bawtry.

2.14. This is of particular concern in relation to Doncaster MUA which is identified as the focus for economic and housing growth, and therefore should be accommodating more housing. SDEB 7 Table 3.3 considers that the proposed distribution resultant from allocations is just over
46% of the total allocations. Furthermore, our analysis of sites that are proposed to be allocated shows that some should be discounted due to technical and viability concerns. For example, Site 838 has significant concerns and has been shown in the Council’s evidence to have technical issues and to be unviable.

2.15. Our analysis also shows that the supply of housing in Doncaster is constrained. Housing permissions have lapsed, more recent permissions have reduced the quantum of housing provided, and development has stalled on sites with significant constraints. The discount to be applied over the Plan period amounts to at least 116 dwellings, although we would expect this figure to be potentially higher. This further impacts on the consistency between the plan aspirations and proposed allocations. Further allocations under Policy 6 are required in Doncaster Main Urban Area to ensure that the Plan is capable of delivering the spatial strategy established in Policy 2 (as submitted) and Policy 3.

2.16. Strata Homes consider that the Plan should be modified and the following site should be allocated.

- Site 234, Broad Axe, as indicated in Matter 1 this site performs as well if not better than allocated sites in the sustainability appraisal, performing better than sites 350, 241, 164/430 and Site 33. Passes the sequential test, Performs as well as another site that has been allocated in relation to the Green Belt Assessment. Notably this site was a draft allocation in 2018 and therefore considered appropriate by the council, according to its site selection methodology.

2.17. Strata Homes consider that there are Exceptional Circumstances to support the release of the sites from the Green Belt, in relation to housing need (Matter 2) and the need in Doncaster MUA.

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

2.18. Strata Homes has no specific comment in relation to this issue.
**Q3.5. 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?**

2.19. Strata Homes 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.

2.20. 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.

2.21. 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. Strata Homes 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. The range identified for Doncaster MUA, is not sufficient to ensure that the strategy to deliver at least 50% of development within the MUA can be achieved. The approach taken and lack of consistency internally within the document undermines the effectiveness of the policy.

**Proposed Change**

2.22. 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.
- Allocate additional sites to ensure that the spatial strategy proposed is capable of being delivered.