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.

3.1 We do not believe the broad spatial distribution of development is justified. It has failed to take adequate account of the constraints posed by green belt and flood risk – in terms of both practicality and national policy - and has not been the subject of an appropriate sustainability appraisal. Our reasoning in that regard is set out more fully in our response to Matter 1 and is not, therefore, repeated here.

3.2 For the spatial strategy to be found sound, more development will need directing to those settlements in the south west of the borough which is outside the green belt and free of flood risk.

   b) The ranges for the number of new homes in and around each of the individual Main Towns and Service Towns and Villages.

3.3 We do not believe these ranges are justified. Again, in our response to Matter 1 we have set out why – for reasons related to green belt policy and flood risk – it will be necessary for some settlements to have different housing requirements to those indicated in the Plan in order for it to be sound.

3.4 In addition, there are two further points which are specifically relevant in this regard, as follows.

**Auckley and Hayfield Green are separate settlements**

3.5 The proposed settlement hierarchy treats Auckley and Hayfield Green as a single settlement and assigns a single growth target to the combined settlement. This is not justified by the evidence.

3.6 Our case in this respect is set out fully in §2.10 to §2.16 of our representations made in respect of the Publication draft of the Plan and won’t, therefore, be repeated here. In
summary, however, Auckley and Hayfield Green are physically and functionally separate and both are sustainable in their own right. The distinction between Auckley and Hayfield Green is no different to that between other settlements in the borough which are in close proximity to each other and which have been treated as separate settlements in the settlement hierarchy. At an early stage in the Plan process, the two were treated as separate settlements and no justification is given for combining the two settlements.

3.7 The distribution of the housing requirement at this level of the settlement hierarchy is justified on the basis of ensuring those settlements can meet their own local housing need. By arbitrarily combining the two settlements and then directing all the housing requirement to Hayfield Green, Auckley is unable to meet its own local housing need.

3.8 This element of the Plan will not, therefore, be effective in delivering its stated strategy of allowing smaller settlements to meet their own needs, nor is the proposed distribution justified by the evidence. For the Plan to be sound, Auckley and Hayfield Green should be treated separately, with a standalone housing requirement being set for Auckley (and sites identified to deliver it, such as Site 1013 and adjacent land, to the south of Common Lane).

**Distribution of the “economic growth” component of housing supply**

3.9 The proposed housing requirement is explained as comprising two elements – a “baseline” local need component and an uplift to support economic growth. All of the economic growth component has been directed to the Main Urban Area despite one of the main drivers of economic growth – Doncaster Sheffield Airport – being located to the south of the borough away from the Main Urban Area.

3.10 Our representations in respect of the Publication draft Plan cover that point in detail at §2.51 to §2.56.

3.11 For the distribution of homes to reflect the justification provided by the council, a proportion of the “economic uplift” component of the housing requirement should be directed towards to the south west of the borough, closer to the airport.
Summary

3.12 Overall, there are three shortcomings of the proposed distribution of new homes: the treatment of flood risk and green belt; the treatment of Auckley and Hayfield Green; and the distribution of the “economic uplift” component of the housing requirement. Each of those problems of soundness could be overcome by directing more housing growth to the south west of the borough – the location closest to the airport and which is unconstrained by green belt or flood risk. That should, in part, involve giving Auckley its own housing target.

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?

3.13 For the reasons set out in our response to Matter 1, policy 6 of the Plan is not consistent with policies 2 and 3. In summary, there is a significant difference between the planned distribution of new homes and the actual proposed distribution of new homes. The proposed distribution has not been subject to a sustainability appraisal and does not appropriately reflect national policy relating to either green belt or flood risk.