Doncaster Local Plan Examination
Matter 3 Statement - Strategic Approach

Issued  September 2020

1.1 This Hearing Statement has been prepared on behalf of our client (Swan Homes Ltd) (ID 05291). Our client seeks to respond to Questions 3.2, 3.3, 3.4 and 3.5 only.

Spatial strategy

Q3.2. Is the broad spatial distribution of development proposed in policies 2 and 3 justified? In particular, the aims to accommodate:

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

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?

1.2 Questions 3.2(b) and 3.3 are answered jointly below.

1.3 Policy 3 sets out how the housing requirement for the Doncaster Local Plan (“DLP”) will be distributed. This includes a requirement of 55 new homes for Finningley. This reflects paragraph 16.220 of the DLP.

1.4 However, Table H1(O) shows the allocations for Finningley, with only 50 units being allocated over three sites across the Plan period. This represents a shortfall of a minimum of five homes over the plan period which represents 10% of Finningley’s minimum housing requirement not being met. We disagree with paragraph 16.220 of the DLP which states that despite planning for a 10% shortfall against the minimum requirement “it is not necessary to allocate any further land in this settlement to meet the small shortfall of 5.” This is particularly so when there is a suitable, sustainable and available brownfield site being promoted for housing by our client which could meet this identified shortfall.

1.5 Policy 6 clearly fails to meet the NPPF’s call for positive plan preparation, outlining that plans should “be prepared positively, in a way that is aspirational but deliverable” (paragraph 16 of NPPF). By actively planning to fail to meet even the minimum requirement (which we argue should be significantly higher) at this stage, the DLP cannot be said to be sound within the bounds of the NPPF. This can be rectified by allocating additional land at Finningley for housing and revising the development limits of Finningley to allow for additional homes to be delivered.

1.6 As detailed below, our client’s land represents a suitable and sustainable location for new housing and we request that it is allocated for housing and that the development limit for Finningley is revised to include the site. A planning application for the development of 39 homes at the site is due to be submitted in September 2020.
1.7 Our client’s site is located to the east of Station Road and lies to the north of Robin Hood Airport and is approximately 10km east of Doncaster. The site measures approximately 0.8ha in size and comprises an area of hardstanding, scrubland and trees. It is bounded by:

- Residential development off Station Road and on the site of White & Carter wholesalers, the plot of land immediately to the west of the proposal site also has planning permission for residential development;
- An open field and Blakestone Glade residential development to the north;
- Copses of trees and a storage area for caravans, trailers and haulage vehicles with a dirt track access road to the east; and
- A caravan storage area and railway line to the south

1.8 The site can accommodate 39no. units of high-quality family housing and incorporate associated car parking, landscaping, open space and sustainable urban drainage.

1.9 Our client’s site is in a sustainable location for housing and is well served by local public transport connecting Finningley to Doncaster Town Centre. There are two bus stops within 250m of the site, which run frequent bus services to Doncaster. The site is also in close proximity to a pub, sports pitches, a range of schools and healthcare facilities, including:

- Nearest shop (Finningley Post Office): 450m
- Nearest primary school (Hayfield Primary): 2.1km
- Nearest secondary school (Hayfield School): 2.2km

1.10 The site represents a continuation of the recently completed earlier phases of Swan Homes Ltd’s residential development immediately to the north and west of the application site (45 houses in total) (08/00563/OUTM, 12/01327/EXTM) with approval recently granted for a further 14 houses to the west (18/02593/FULM).

1.11 The site is identified as a suitable location for housing within Doncaster’s HELAA (2017-18) [SDEB45] (site 317) and is described as a brownfield urban extension site. The interactive HELAA Housing Map identifies the site as a “Deliverable/Developable Site (not got planning permission)”. The recent approval of applications for residential development immediately to the west clearly confirms the Council’s view that this is a suitable location for housing.

1.12 Furthermore, the Doncaster Local Plan Topic Paper 4: Housing (March 2020 Submission) [DMBC4] states on page 37 that:

“The settlements [including Finningley] 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.” (Emphasis added).

1.13 This further supports the identification of the site for sustainable residential development outwith the existing restrictive development limit. Additionally, within the Doncaster Settlement Profile 2018 document, our client’s land was identified as a ‘Housing Site Option’ within the Countryside on the edge of the Finningley settlement. In the Site Selection Settlement Summaries document [SDEB47] the site was rejected for housing as the Council’s analysis stated it is:
"Rejected housing site: The site is greenfield and countryside and would form an extension to the settlement. Given Finningley can meet most of its housing target via permissions (being just 5 short of its target of 55), it is not considered that such an extension into the countryside is necessary, nor can it be justified. Part of this site falls within Residential Policy Area, however." (Emphasis added)

1.14 However, Swan Homes Ltd contests this as much of the site is in fact brownfield land as recognised by the Council in their own HELAA. In addition, as discussed above, the DLP’s ambition to fail to meet its targets for Finningley is not sound within the bounds of the NPPF, and therefore cannot be used here to justify the rejection of this site which would help the DLP meet these targets for Finningley. Exceeding it by allocating a site of this size would provide a degree of flexibility to ensure that the minimum requirement for Finningley and Doncaster as a whole will be met.

1.15 Within the 2018 Settlement Audit, Finningley scores well for having a primary school, GP Service, POS and a secondary bus service. Despite not having a ‘Town Centre’ as defined in the settlement audit, it has a number of services and amenities distributed across the settlement. It should also be noted that a train station is planned for the neighbouring Robin Hood Airport, which would serve Finningley when completed, further enhancing the settlement’s connectivity.

1.16 The NPPF (paragraph 78) encourages linkages between smaller settlements and villages identifying that housing should be located where it will enhance or maintain the vitality of rural communities, especially where this will support local services and acknowledges that development in one village may support services in nearby villages.

1.17 In the DLP (paragraph 4.17.2), the settlement of Finningley is described as being part of a cluster of villages with Finningley, alongside Auckley-Hayfield Green, being described as providing a service function for the other villages. This makes clear that Finningley, within this support network of villages could accommodate further residential development in the area such as our client’s proposed site.

1.18 It is also notable that Policy 3 includes a “Defined Village Cumulative Growth Limit (over Plan Period)” for Defined Villages as well as a “Size Limit for an Individual Scheme / Site.” It is wholly unsound to include a growth limit or size limit for Villages as this flies in the face of the NPPF which sets out the “Government’s objective of significantly boosting the supply of homes...” (NPPF paragraph 59).

1.19 It is therefore suggested that this limitation is removed from the Plan.

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

1.20 The proposed changes do provide some further clarity on the Strategic part of the text and the decision-making part of the text. However, our client maintains its fundamental concerns regarding the settlement limits.

1.21 The development limits outlined in the DLP present a notion of controlling the location of development, which is a restrictive approach that is at odds with the NPPF. The NPPF directs that Local Plans should “provide a positive vision for the future of each area...” (NPPF paragraph 15). If development limits are proposed, their role should be to help direct development needed to the right places; providing sufficient flexibility to accommodate development needs not currently anticipated (NPPF paragraph 81).
By including development limits to control development, the DLP conflicts with the NPPF (paragraph 16) which requires that Local Plans are “prepared positively, in a way that is aspirational but deliverable...”. Whilst the NPPF expects Local Plans to identify land where development would be inappropriate and does not explicitly preclude the inclusion of settlement boundaries or development limits, it does not specify that Local Plans define settlement boundaries and does not instruct Local Plans to preclude development at the edge of a settlement. Rather, the NPPF simply supports sustainable development.

The Site Selection Settlement Summary [SDEB47] is clear that, for Finningley:

“The settlement is surrounded by countryside, the boundary of which has been reviewed for the Local Plan. This is tightly drawn to the built development limits of the settlement.”

The ‘tightly drawn’ development limits around Finningley, designating our client’s site, which is largely brownfield land (previously used for distribution and manufacturing, recycling and storage of construction waste and materials, and storage of construction plant), as Countryside, restricts development to an extent that is at odds with the NPPF’s presumption in favour of sustainable development. Should development limits remain, the development limit of Finningley should be revised to include our client’s land, which is largely brownfield land, adjacent to existing (or consented) residential development in a sustainable location. This would help achieve the NPPF’s objective that Local Plans are based on robust evidence of development need with a buffer to provide sufficient flexibility.

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?

No. As set out in our Matter 2 Statement the housing requirement figure is not clear as it is expressed as a range without being sufficiently justified and this is not consistent with the NPPF or PPG; with the lower end of the range being entirely out of alignment with the economic aspirations of the DLP.

Furthermore, the table within Policy 3 suggests there is a ceiling on housing delivery. Again, this is inconsistent with the NPPF and it should be made clear that the housing requirement, which should be a single figure, is the minimum.