1.1 This Hearing Statement has been prepared on behalf of our client (Theakston Estates Limited) (ID 01937). Our client responds to Question 3.2 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:

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.

1.2 Objective 10 of the Plan identifies a clear objective to “focus new homes primarily within the main urban area of Doncaster” and Policies 2 and 3 respond to this by stating that “at least 50% of new homes will go to the Main urban area” (added emphasis).

1.3 Theakston Estates agrees with the approach to focus the majority of housing delivery in the MUA however, for context, this is a significant dilution to the 64% of housing which was previously directed to the MUA, and endorsed by the Inspector, in the former Core Strategy.

1.4 The Inspector stated in relation to the Core Strategy distribution focusing on the MUA that:

“In this way, the Core Strategy seeks to change the pattern of development to ensure better access to services and especially public transport. This is a vital aspect of sustainable development.” (Paragraph 35)

1.5 South Yorkshire and Doncaster has a dispersed settlement pattern and the most sustainable option is to focus growth in the MUA. In recent years, the main towns and service villages have benefitted from development which has come forward speculatively and the preparation of the Plan therefore provides an opportunity to direct growth where it is most sustainable and where it would contribute to wider aims such as realising the economic strategy.

1.6 We have reviewed the Plan and the relevant evidence base documents to understand the distribution of the potential sources of housing land supply, however there appears to be conflicting information. For instance, the Housing Topic Paper [DMBC4] (Figure 25/ Figure 46) indicates that 53.2% of the supply is located in the MUA whereas Table 3.3 in the Sustainability Appraisal Addendum [CSD7] suggests the proportion in the MUA is 46.4%, yet both documents are dated March 2020.

1.7 In addition, the Council’s approach to re-basing the period in which the housing requirement and housing land supply are calculated also adds an unnecessary complication. We have therefore looked to simplify the position in order to understand the proportion of the housing supply which is located in the MUA and if it aligns with the requirement in Policies 2 and 3.
1.8 The plan period is 20 years between 2015-2035 and the housing requirement for this period is 18,400 dwelling or 920dpa. If the Plan is to fulfil the aims and requirements of Objective 10, and Policies 2 and 3, at least 9,200 homes (460dpa) must be delivered in the MUA.

1.9 Using the Council’s data, the bullets below indicate the housing land supply in the MUA within the plan period:

- 2015-18: 1,440 net completions in MUA
- 2018-33: 7,042 dwellings (which includes 3,489 dwellings from sites with planning permission or prior approval and 3,553 dwellings from new allocations)
- 2033-35: 140 dwellings

1.10 For clarity, the above figures exclude the potential contribution to the supply by Reserve Development Sites as these sites are not deliverable and cannot be relied upon to deliver new homes. The approach to exclude these sites from the housing supply is consistent with that taken by the Council.

1.11 The housing supply in the MUA totals 8,622 dwellings which equates to 46.9% of the overall housing requirement (18,400). This means that there is a deficit of at least 578 dwellings if the Plan is to deliver at least 50% of new homes in the MUA.

1.12 This broad calculation also assumes a best-case scenario that each site will come forward and we have highlighted separately our concern for the lack of flexibility and not factoring in lapse rates. If you assume a typical lapse rate of 10% (which equates to around 720 dwellings 2018-2035), the Council’s position worsens still further and, together with the above deficit, indicates that the Council needs to identify land in the MUA for at least a further 1,300 dwellings.

1.13 In addition, we have identified our concern for the deliverability of some sites in the MUA and also the approach taken by the Council to allocate sites in Flood Zones 2 and 3.

1.14 Our concern for the proportion of new homes being delivered in MUA is also perpetuated by the net completions data. Table 1 below summarises the net completions in the Borough within the last 4 years (within the early part of the plan period) and the amount located in the MUA.

<table>
<thead>
<tr>
<th>Year</th>
<th>Borough Total</th>
<th>MUA Total</th>
<th>MUA %</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015/16</td>
<td>1,025</td>
<td>459</td>
<td>44.8%</td>
</tr>
<tr>
<td>2016/17</td>
<td>1,049</td>
<td>555</td>
<td>52.9%</td>
</tr>
<tr>
<td>2017/18</td>
<td>1,137</td>
<td>426</td>
<td>37.5%</td>
</tr>
<tr>
<td>2018/19</td>
<td>1,189</td>
<td>368</td>
<td>31.0%</td>
</tr>
<tr>
<td>Total</td>
<td>4,400</td>
<td>1,808</td>
<td>41.1%</td>
</tr>
</tbody>
</table>

Source: DMBC Residential Land Availability Reports

---

1. As detailed in our response to Q2.5 (see Matter 2 Statement), we do not consider a range to be justified.
2. Data gathered from DMBC Residential Land Availability Reports
3. Data gathered from the Housing Topic Paper [DMBC4]
4. Data gathered from the Housing Topic Paper [DMBC4]
5. Please see paragraph 4.82 in the Local Plan (Publication Draft) [CSD3]
6. Please refer to our response to Q5.7 (Matter 5 Statement) where we set out in further detail our concern for the approach to lapse rates.
7. Please refer to our responses to Q1.11, Q1.12 and Q5.8
Just 41.1% of new homes have been delivered in the MUA in the last 5 years and the proportion of completions in the MUA exceeded 50% in just one of the years (2016/17) and in the most recent year of monitoring, the proportion was just 31.0% (368 dwellings).

It is recognised that a large proportion of the Council's housing land supply (particularly in the short term) is comprised by sites with planning permission. The data in Table 1 indicates that there could be a potential delivery issue with some of the committed developments in the MUA.

This further adds to our concerns regarding the housing trajectory where the housing supply appears drop off in the later years of the plan period. The Housing Topic Paper [DMBC4] (Figure 25) also indicates that just 140 dwellings will come forward in the MUA within the final two years of the plan which is significantly short of the Plan’s objective to direct at least 920 dwellings to the MUA over this two year period (based on 460 dpa x 2).

These concerns all point to a need to achieve a step change and to allocate more homes in the MUA to avoid the Plan failing to achieve its objective and policy requirement to deliver the majority of new homes in this area.

Word Count: 966

---

8 Please refer to our response to Q5.10 (see Matter 5 Statement)