Reference Number 03259 and 03453

Matter 3 Strategic Approach

Submissions on behalf of

Mr G Turnbull
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We act for Mr W Turnbull of Skellow Grange, who is part landowner of the following sites

- Site ref 164/130  Warning Tongue Lane Doncaster
- Site ref 165/186  Skellow/ Carcroft  [northern section]

We are instructed to attend the examination on his behalf and to comment on the issues that affect the development of these sites and associated matters, that have been set out in our original submissions to the Doncaster Local Plan.

Our client supports the allocation of both of the above sites and wishes us to contribute at the examination to assist in finding the plan sound with relevant modifications.

We have addressed the relevant questions in this Matter 3 and set out our comments below.

In response to the Inspectors questions :-

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?

There is no need for this Policy in the Plan
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.

The Council have proposed to amend the wording of policy 2 in their answer to PG14 and set out new wording to “simplify” the text. This does not alter the split of development between the sustainable locations or the fact that the service towns and villages will not benefit from any economic led housing growth. The Housing Topic Paper DMBC4 at para 4.4.4-4.4.13 discusses the apportionment of growth, wherein the economic uplift proportion of the housing is apportioned to the main urban area [between 60 and 70%] and up to 10% each to the main towns. Service towns and villages receive none of this growth, but are apportioned growth for only 15 years according to the number of households in each settlement. [table page 39 Housing topic paper]. The service towns and villages are sustainable settlements and there is no rationale to exclude them from a degree of meeting some of the proposed economic growth. In the circumstances that the overall housing numbers are increased as a result of planning for 17 years instead of 15 years, or as a result of adding in the complete economic uplift to 1035 dwellings per annum then additions should be made to this tier of settlement according to the availability of appropriate sites.

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

As set out in answer to matter 2 we do not agree that a range of housing provision is an appropriate way of dealing with the housing requirement and have set out that the figure should be the requirement of 920 dwellings per annum x 17 years or a higher requirement based on economic uplift x 17 years.
The housing figures for the service towns and villages are not expressed as a range in Policy 3 but are a general proportionate allocation as described above.

Depending on the findings for the overall housing numbers the distribution should be set out as a single figure which should be regarded as a minima in each case. The use of a range is not necessary in Policy 3, and it does not make the plan easy to understand or use.

The lack of a composite table in the plan, clear setting out, the plan period requirement, the residual requirement and where this is met is lacking and would assist in understanding and using the plan.

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?

The broad spatial distribution is supported and our comments about this are set out in answer to question 2a above, we support the allocation of Sites ref 164/130 Warning Tongue Lane Doncaster and Site ref 165/186 Skellow/ Carcroft

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?

The Councils response to PQ 15 makes it clear that the tables in Policy 3 are also to be used in development management decisions on applications in the listed settlements. The figures in table three should not be used as maximum housing numbers to limit the development in the settlements when considering applications. These numbers should only be regarded as a guide, the detailed site considerations will indicate the appropriate amount of development on individual sites.
The Councils response to PQ 28 implies that the level of development in a settlement will be capped when they surpass the housing target for that settlement and that any oversupply will be “set aside for calculation purposes to account for housing in the final two years of the Plan” it is not at all clear what this means and how this will be implemented.

There should not be capping of development in the sustainable settlements. The broad distribution of growth and the sites allocated in the settlement hierarchy is a planned general distribution of new development, there is no need for the plan to be more prescriptive than this. Sites that exceed the current numbers assigned to them in the Plan will not tip the strategy into freefall. The notion of capping is not flexible or justified and should be removed from the Plan.

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