M3. Strategic Approach

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.

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.

The Main Urban Area is defined as the contiguous built-up area of Doncaster comprising a number of distinct but connected districts arranged around the town-centre; such as Warmsworth. As such, we support that at least 50% of new homes should be located in this location.

Doncaster is the principal settlement within the local authority, with excellent sustainable transport links (including the East Coast Mainline), acting as a hub from which all other settlements support. As such, the Main Urban Area should be the primary focus for sustainable growth, in line with Policy 1 of the Local Plan as submitted and national policy, maximising on infrastructure and service provision.

As per the policy wording, “at least 50%”, suggests that this should be a minimum target. It is vital that the sites identified in the plan to accommodate this growth are deliverable, developable and viable to ensure that the spatial approach is met.

Additionally, some development should also be delivered in the smaller settlements and it is considered that the broad spatial distribution of development allows for this. It is vital that communities across the Borough remain viable; supporting the services and facilities that already exist in a range of 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?

As set out above in our response to Question Q3.2, at least 50% of new homes should be located in and around the Main Urban Area. It is vital that the sites identified in the plan to accommodate this growth (both allocations and reserve sites) are deliverable, developable and viable.
The Warde-Aldam Estate owns land in and around Warmworth and it is considered that these sites would assist in meeting the housing need in the Main Urban Area if other allocated or reserved sites are not considered viable or deliverable over the specified plan period.

It is essential that appropriate measures are in place to monitor the delivery of housing sites to ensure that there is not a shortfall at any point during the plan period. We do not consider that the measures outlined within paragraphs 15.12 to 15.14 provide an appropriate arrangement to ensure proper monitoring and corrective action is taken should it become apparent that a shortfall in housing provision is occurring. A lack of a 5 year housing land supply should be a trigger and highlighted as such in the document. As such, to ensure that enough deliverable sites are allocated, the Council may need to identify additional land to ensure that the minimum housing requirement of 920 dwellings per annum is met.

There are no specific timeframes or triggers within the Draft Local Plan for undertaking or requirement for completion of a review. Criterion e) of the monitoring text on page 184 only states that they need to determine if there is any need to undertake a partial or full review of the Local Plan rather than undertaking one. The Council therefore run a real risk of under delivering by not undertaking a review if a short fall is occurring. This needs addressing within policy to comply with paragraph 33 of the NPPF. Reviews at least every five years are a legal requirement for all local plans (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012) and this should be embedded in to policy.

Whilst we understand it is not the purpose of the Examination to consider discounted sites, as part of the Examination there are key questions of soundness and NPPF compliance. It is therefore considered that further consideration should be given to our clients land at Warmworth to ensure that the spatial strategy is met in respect of the proportion of development proposed to the Main Urban Area.

Our clients sites are known as follows:

- “Mill Lane, Warmworth” - HELAA Housing Site Reference 213
- “Common Lane, Warmworth” - HELAA Housing Site Reference 212 & 214
- “West Farm Fields between High Road and Low Road West, Warmworth” - HELAA Housing Site Reference 162’;

Please see our comments to the Doncaster Local Plan Publication Draft 2019 for further details on these three sites. However, for ease, we would like to highlight that the two strategic sites (HELAA Refs 212, 213 & 214) are considered to be a well contained sites within the Main Urban Area to accommodate future housing development to meet the objectively assessed housing need for the Borough over the Plan period. Both of these sites are identified as deliverable and developable in the HELAA with only the Green Belt being a constraint to future development. As such, these sites would help assist in delivering the much needed housing requirements in a sustainable location in accordance with the broad spatial distribution of development as per Draft Policy 2 and 3 of the Draft Local Plan.
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?

In accordance with the settlement hierarchy outlined in Draft Policy 2, Draft Policy 3 goes on to state the specific distribution of development across the Borough, with at least 50% of development being directed to the Main Urban Area of Doncaster. This proposal also acknowledges that development could also occur in other settlements subject to it being commensurate to the existing size of the settlement.

Whilst we support the use of the settlement hierarchy to help establish the most sustainable locations of growth, it is important that the figures set out in Draft Policy 3 are just minimum figures. Capping development in some areas could lead to stifling sustainable development in the future. As such, providing a minimum figure only (with no ceiling / cap) would readdress the soundness of the plan, in accordance with paragraph 60 of the NPPF.