Representations to the
Doncaster Council Local Plan

Matters, Issues and Questions

Prepared on behalf of Bellway Homes Limited (Bellway)

August 2020
Representations relating to the Examination of Doncaster Local Plan; Inspector’s matters, issues and questions

Prepared on behalf of

Bellway Homes Limited (Bellway)

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1.0 INTRODUCTION

1.1 These representations have been prepared by Barton Willmore on behalf of Bellway Homes Limited (Bellway) (hereafter referred to as the ‘Client’).

1.2 Our Client has a keen interest in the future development of Doncaster and is grateful for this opportunity to engage in the examination hearing sessions. In preparation for those hearing sessions we have prepared, on behalf of our Client, a number of written statements in response to the Inspector’s matters, issues and questions set out within Note 4.

1.3 Our Client is one of the UK’s leading housebuilders, committed to the highest standards of design, construction and service. They have a number of site interests across Doncaster and are therefore pleased to have the opportunity to positively engage with the Inspector and with the Council to help achieve a robust Local Plan.
2.0   **INSPECTOR’S NOTE: MATTERS, ISSUES AND QUESTIONS**

2.1  These representations respond to the Inspector’s matters, issues and questions opening dialogue and debate to allow an informed decision to be made as to whether the Plan is sound and legally compliant and, if not, how it could be modified to ensure that it is.

2.2  Our responses within this statement respond directly to the questions raised by the ‘Inspector’s Note No. 4: Matters, Issues and Questions document’. The matters considered relevant to our Client in this instance are:

- Matter 2 – Quantity of Development needed in the Borough
- Matter 3 - Strategic Approach
- Matter 4 - Green Belt
- Matter 7 - Specific Types of Housing

2.3  We comment on the above matters alongside Barratt and David Wilson Homes (Yorkshire East).

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¹ Doncaster Local Plan Examination - IN No. 4 – Matters, Issues and Questions, June 2020.
M2. Quantity of Development needed in the Borough

Q2.4. Does the Plan clearly establish a housing requirement figure for the Borough for the Plan period as required by national policy?

Q2.5. Is expressing the housing requirement as a range consistent with national policy or otherwise justified? If so, what should the bottom of the range be (assuming that it must be a fixed figure)?

2.1 We have serious concerns regarding the Council’s methodology which has been used to calculate the housing target of 920 dwellings per annum over the plan period 2015 – 2035.

2.2 Policy 3 explains that, using the Government’s Standard Housing Methodology as a starting point, national projections identify a housing need in the Borough for 585 homes per year (baseline growth) over the plan period (8,775 homes). In addition, to meet planned economic growth over the plan period, an additional 327 homes per year (economic growth) is identified. This gives a total objectively assessed housing need (OAHN) of 912 new homes (net) per year for the Borough once economic growth is taken into account.

2.3 The Council’s evidence has shown that an uplift is required in order to meet the economic aspirations, therefore without the top end of the range being met, these jobs will not be delivered. The inclusion of a range does not provide a clear requirement figure, it adds confusion to matters such as five year land supply and housing delivery test.

2.4 The plan does not clearly establish a housing requirement figure for the Plan period. Furthermore, whilst expressing the housing requirement figure as a range, the growth figure is not fixed, it remains an aspirational figure that is not accurate or decisive; there is nothing in planning policy that advocates that approach.

2.5 In summary, Policy 3 which sets the housing figures, is unsound and does not meet the tests of soundness set out in paragraph 35 of the Revised Framework. The policy is not justified, effective or positively planned and should be revised.

Q2.6. Is the strategic aim in policy 3 to facilitate the delivery of 18,400 new homes in the period 2015 to 2035 (920 dwellings per year) justified and positively prepared? In particular:

a) Is it appropriate to plan for a higher figure than the standard method indicates (585 homes per year)?

2.6 The implementation of the standard method resulted in significantly reduced levels of housing delivery across the north of England, particularly in Yorkshire, which had negative
impacts upon the wider economy. This significant reduction in homes was further increased by 2016 population projections, to a point that they were omitted form use in the standard method. Given the significant negative impacts that this has had for the north of England a number of authorities have sought to increase the level of homes in order to meet economic aspirations.

2.7 In the case of Doncaster, the Council is preparing an ambitious Local Plan to meet economic requirements, which show a need for over 1000 homes per annum, significantly above that in the standard method, albeit it justified in accordance with the PPG.

b) Are the economic growth assumptions upon which the strategic aim of 18,400 new homes is based aspirational but deliverable between 2015 and 2035?

2.8 Our Client supports the growth aspirations and the evidence provided by the Council.

c) If such economic growth were to materialise, would it be likely to affect demographic behaviour to the extent that an additional 335 homes are needed every year between 2015 and 2035 (on top of the 585 per year that the standard method indicates are needed)?

2.9 The standard method reduces the level of homes significantly below both previously delivered levels of homes and previous plan requirements. The amendments currently being consulted on show a reversal of this in Doncaster with a 75% increase to almost 950 homes per annum.

2.10 The starting point of 585 homes is somewhat misleading in this respect and the Councils uplift is not as significant as it appears when considering previous levels of delivery and the revised standard method figure. Given the difference follows past trends and delivery it is not unreasonable to suggest the requirement will not be met.

d) Do previous levels of housing delivery in the Borough indicate a need for more than 585 homes per year?

2.11 The Council have delivered an average of 829 homes per annum over the last 10 years, with the previous four years all delivering over 1000 homes and the last two years delivering an average of over 1250 homes per annum. These figures, without an up-to-date plan show that the 585 homes figure is significantly constrained and support the need for a significant increase.

e) Should the Plan aim to deliver more than 585 homes per year in order to help meet the need for affordable homes?
2.12 The Councils 2019 Housing Needs study shows a requirement for 209 affordable homes per annum. Whilst these can come forward from a variety of sources, a significant proportion will be delivered as part of market housing schemes. The Councils evidence on past delivery shows that this figure has only been met twice in the last ten years with an average over that period of 157 homes.

2.13 Should the plan only seek to deliver 585 homes this would require approximately 40% of them to be affordable to meet the need, with only 23/15% or market homes required to deliver affordable homes this simply will not be met.
M3. Strategic Approach

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?

2.14 Our Client welcomes the provision of a policy which sets out how development proposals will be considered in the context of the presumption in favour of sustainable development.

2.15 However, we consider that the wording of the policy has an element of repetition and that parts b) and c) are unnecessary and should be deleted. Part a) of the policy states that when considering development proposals, the Council will take a positive approach which reflects the presumption in favour of sustainable development contained within the National Planning Policy Framework. That should be sufficient wording for the policy.

2.16 Parts b) and c) go on to set out the presumption in favour of sustainable development, but this does not accurately align the wording within the Framework. There is no reference to the presumption being subject to material considerations where proposals accord with policies in the plan.

2.17 Our Client recommends that the policy is revised and that parts b) and c) should be removed.

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.

2.18 Our Client objects to the distribution of housing through the settlement hierarchy; it is too heavily focused on both the Main Urban Area and the Main Towns, with 90% of the Council’s housing to be delivered in these areas.

2.19 In addition to the disproportionate growth focussed on these areas, the wording of the policy is vague and could potentially lead to more than 90% growth in these areas leaving Villages to stagnate.

2.20 The proposed distribution strategy identifies a defined village does not have allocations for new development. Our Client suggests that growth should be more evenly distributed across the Authority, with proportionate allocations for development at all levels of the hierarchy whilst conceding that higher levels of growth will be found within the Main Towns and Service Towns and Villages. The Council have a duty to ensure that they deliver the level of
housing set out within the Plan and it is important that housing is directed towards areas where it can be delivered and where people want to live.

2.21 The wording of the policy is unclear and is not definitive with ‘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.

2.22 The wording of the policy should be prescriptive and unambiguous. The vague language currently used could potentially result in high levels of housing delivery within the Main Urban Area and Main Towns leaving villages such as Branton, which is sustainable, achieving no growth and effectively being left to stagnate over the plan period.

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

2.23 The Local Plan reclassifies the designation of the village (within the settlement hierarchy) from a ‘Larger Village’ to a ‘Large Defined Village’. The sustainability credentials of the Branton have not changed, yet the status of the village within the settlement hierarchy has been reduced. As such we object to the Council’s distribution strategy.

2.24 Our Client has land interests in the village of Branton. The submission Local Plan puts a “Cumulative Growth Limit” of 70 new homes on Branton, a limit that is almost double and is the largest of all the other Large Defined Villages.

2.25 Our Client has commissioned an independent Housing Needs Market Assessment (submitted alongside these Representations) which demonstrates that Branton actually has a capacity for 100 homes over the plan period. As such, our Client believes there is sufficient justification to shift Branton higher up the settlement hierarchy, for Branton to have its own housing allocation and the cumulative growth limit of 70 new homes for Branton should be increased to 100 new homes utilising our Clients site at located to the east of Doncaster Road and Whiphill Top Lane in Branton.

2.26 In addition, Policy 2 states that "in exceptional circumstances, and subject to the demonstration of clear local community support, residential development in appropriate locations may also be supported in the Countryside on land adjacent to the development limit of a Defined Village". Our Client objects to this approach based on the fact that all planning applications should be considered against adopted planning policy and material planning considerations, not influenced or based on community support.

2.27 Preventing towns and villages from growing and forcing them to stagnate is not acceptable.
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?

2.28 In defined villages the Local Plan severely limits the number of new homes over the plan period. In the case of Branton, the Village’s designation has been downgraded from a Larger Village to a Defined Village, yet the sustainability credentials of the Village have not changed. Our Client contends that the settlement is capable of taking higher numbers of new development and, in terms of growth limits, the policy is inconsistent with the Framework in that respect.

2.29 Policy 2 vaguely defines the Spatial Strategy and Settlement Hierarchy whilst Policy 3 sets out the Level and Distribution of Growth. There are inconsistencies with the level of growth apportioned to different settlement types within the hierarchy due to vague language used.

2.30 Policy 2 apportions the number of new homes as follows:

- In and around the Main Urban Area: “At least 50%”
- Main Towns: “approximately 40%”
- Service Towns and Villages: “About 10%”

2.31 In contrast to Policy 2, Policy 6 refers to Chapter 16 which states at 16.13 that “the Main Urban Area will be the main location for housing growth in the plan period. In total, the area will deliver between 50 – 55% of the Borough’s overall housing requirement in a variety of locations, which includes 60 – 70% of the economic uplift for the Borough being delivered”.

2.32 The wording of the policy effectively introduces a ‘range’ where the distribution figure should be explicit. There is nothing in planning policy that advocates such an approach. The knock-on-effect of having 5% uplift in housing delivery within the Main Urban Area could mean that housing is redirected away from Service Towns and Villages which are only apportioned 10% growth in the first instance. The effects of this redistribution will be hard hitting resulting in a 50% reduction in housing in sustainable settlements such as Branton.

2.33 In summary, the spatial distribution figures should be less ambiguous; the language used should more clearly define housing numbers within each tier of the hierarchy and be consistent across all policies.
M4. Green Belt

Q4.1. Were all reasonable options for meeting identified development needs in non Green Belt locations fully examined during the preparation of the Plan? In particular:

a) Does the Plan make as much use as possible of suitable brownfield sites and underutilised land?

2.34 Our Client feels that other sites and locations have not fully been examined. Our Client’s site, located to the east of Doncaster Road and Whiphill Top Lane in Branton, was put forward and for allocation and should be considered as a logical extension to the settlement area. The site has potential to be designed in a manner which will enable it to be largely enclosed on all sides, achieve a high standard of design and deliver significant community benefits to the Village. Our Client’s site has the ability to meet identified development needs in non Green Belt locations and will make use of underutilised land.

2.35 In summary our Client rejects the statement that the Plan makes as much use as possible of suitable brownfield sites and/or underutilised land.

Q4.8. Have exceptional circumstances to justify removing each of the eight housing allocations from the Green Belt been fully evidenced and justified?

2.36 Other sites, which are not within the Green Belt, such as out Client’s sites at Branton, have not been explored and could come forward to take the same number of houses. This clearly demonstrates that the exceptional circumstances referenced within the policy have not been fully considered and are not justified. Doing so would significantly reduce the burden of developing Green Belt land unnecessarily.

2.37 With reference to the definition of ‘exceptional circumstances’; Policy 2 states that is a matter for the decision maker to determine. The footnote cites an example where exceptional circumstances may exist:

"where there is a clear demonstrable need for a development, not foreseen by the Plan, that brings significant sustainable development benefits and is consistent with national planning policy in the NPPF”.

2.38 The policy goes on to state that the provision of affordable homes is an example of development likely to meet this definition but that areas at risk of flooding would not considered as appropriate locations for the purposes of this part of the policy.
2.39 The footnote cites ‘significant’ sustainable benefits as constituting exceptional circumstances where there is a clear and demonstrable need for development. Within the Framework there is no requirement for ‘significant’ sustainable benefits where there is identified need. This stipulation seems onerous and our Client believes that sustainable development benefits should be consistent with the wording of the national planning policy in the NPPF.
M7. Specific Types of Housing

Q7.1. Is the approach to housing development in the Countryside set out in policies 2, 3 and 26 justified and consistent with national policy? In particular:

Are the size limits for an individual scheme/site and cumulative growth limits over the Plan period for residential development adjacent to the 14 Defined Villages set out in policy 3 justified?

2.40 Our Client supports the principle of development being allowed outside of development limits as windfall housing provided it is appropriate. Given the level of development approved in similar circumstances through the lack of five year land supply or an out-of-date plan in recent years, more local authorities are starting to include policies to allow this in certain circumstances.

2.41 Policy 3 has three tests, firstly the site must be adjacent to a settlement in tiers 1-3, secondly the scheme must show exceptional circumstances, community support and be in an appropriate location and finally the scale of the development and cumulative growth cannot be met. Whilst our client supports a policy being included, they object to the soundness of these restrictions and tests.

2.42 Firstly the limitation to tier 1-3 settlements has no policy basis. If a smaller settlement has an appropriate site, no harm to the settlement character, landscape character or sustainability to the settlement it should not be dismissed simply because it is outside of the settlement limits. Similarly to deliver the level of homes (10%) in these settlements a significant windfall allowance, including land outside the settlements will be required.

2.43 In terms of the next stage in the policy, we have no objections to the definition of an ‘appropriate location’ as any scheme that does not harm these should be supported. However to require ‘exceptional circumstances’ and ‘community support’ adds in a level of policy that is contrary to national policy.

2.44 Exceptional circumstances are only required for releasing Green Belt land in the plan process and should not be extended to applications simply in the open countryside. Similarly, there is no requirement for community support in national policy. Applications should be considered on their merits and determined as such, if the scheme is shown to have no technical constraints and have no adverse impacts on the character of the area it should not be refused because of a local vote.
2.45 Finally, the limitations on size are considered inappropriate and contrary to policy. Applications should be considered on their merits, again if there are no technical issues and no harm to character from a scheme that exceeds the limits, why should it be refused?

2.46 Overall, the general aims of the policy are supported, however the detailed policy requirements are considered unsound and should be removed.