Examination of the Doncaster Local Plan

Council Hearing Statement

Matter 6.
Housing Development Requirements

September 2020
Site specific requirements for housing allocations without planning permission

Q6.1. Are the development requirements for the housing allocations without planning permission set out in Appendix 2 to the Plan justified? Is there sufficient detail to provide clarity to developers, local communities and other interested parties about the nature and scale of development proposed\(^0\)? Are the Council’s suggested changes to Appendix 2 relating to sites ref 133 (Thorne) and 247 (Rossington) necessary to make the Plan sound?

1. As set out in Planning Practice Guidance, the aim of the developer requirements is to provide “sufficient detail”\(^1\). As such, the developer requirements provide overarching detail as to what will be expected when developers design the sites, unless there is something more specifically important to be mentioned on certain sites that needs to be borne in mind, or that readers need to be aware of.

2. The design section in particularly is important to helping the reader understand the scale and nature of development. As such, these sections are often longer than others to provide sufficient detail, although these also do not go into finite details which will instead be resolved through the planning application process. Other sections such as education contributions are not costed at this point to future proof the plan and allow details to be agreed at the time of an application based on up to date information (see response to 6.14). They do however make readers aware that there will be a requirement related to this, or other matters as listed.

3. The Council considers the requirements to be justified, and these reflect the preliminary thoughts on site requirements from officers across the Council who would usually be consulted on their relative disciplines were a planning application to be submitted. They reinforce the relevant policies of the plan and other details on a site specific basis, and are clear on what is expected from the outset, but the requirements are also concise, providing sufficient details as per Planning Practice Guidance\(^2\), without stifling design or covering matters that can otherwise be resolved at application stage.

4. As the developer requirements should be read in conjunction with other policies in the plan, the detail provided in Appendix 2 is considered sufficient to highlight the key considerations, but concise enough that they do not needlessly repeat every policy requirement already set out within the Local Plan’s policies.

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\(^0\) Ibid.

\(^1\) OTH41 PPG ID: 61-002-20190315

\(^2\) OTH41 PPG, Plan Making, Reference ID: 61-002-20190315
5. The Local Plan viability testing\textsuperscript{4} has factored in site specific requirements into testing and found that sites remain viable and can deliver some level of policy contribution when tested. The Council is satisfied that the developer requirements are able to be met without the viability of sites being impacted.

6. The developer requirements are also proportionate to the size of the sites allocated, i.e. generally sites of 500 or less units. Where larger sites are allocated such as Woodfield Way (836) or Poplars Farm (940 – Airport), these are or will be supported by more detailed masterplanning and design guidance such as the Carr Lodge SPD (836), or the requirement to undertake a masterplanning exercise as part of development proposals around the airport, as set out in Policy 7.

7. On changes to sites specifically:

- 133 – this change is necessary to give greater clarity on how this site impacts on the setting of Thorne House. Since the Local Plan was submitted for examination, the Council has continued to liaise with Historic England looking to resolve the outstanding objection to the allocation of the site. The developer has undertaken additional heritage assessment which has been shared with the Council and Historic England. In summary, the Council’s understanding is that Historic England are agreeable to removing their objection and supporting the principle of the site being allocated in the Local Plan, but with additions (above those already proposed by the Council through DMBC15) to the developer requirements (Appendix 2) and further consideration as to any implication of the capacity of the site (currently 24 dwellings) arising. The Council will continue to progress such discussions in the run up to the Hearing sessions in order to provide a conclusion to this matter as soon as possible.
- 247 – this change is necessary to ensure the site meets the requirement of NPPF paragraph 139(f), and ensure a clearly defined and permanent boundary is created.

**Housing mix**

Q6.2. Is the requirement in policy 8 part A for development to deliver a mix of house size, type, price and tenure to address the needs and market demand in the latest Housing Need Assessment or other robust evidence justified?

8. NPPF paragraph 61 requires that the size, types and tenures of housing need for different groups in the community should be assessed and reflected in planning policies. In light of this question, the Council has concluded that reference to “price” is not consistent with national policy, and therefore have proposed a modification to remove this.

\textsuperscript{4} SDEB48.1 Whole Plan Viability testing 2019, pages 122 - 139
9. Subject to the removal of the word "price", Policy 8 part A reflects the requirement of NPPF paragraph 61.

10. To inform the housing mix requirement, Policy 8 requires that evidence should be informed by a Housing Need Study or other robust evidence. The Council published a Housing Needs Study\(^5\) in 2019 which can be used to inform development proposals, and this will be periodically updated. This evidence looks at the housing mix requirement on a settlement by settlement basis allowing the policy to deliver settlement specific interventions rather than a more general Borough wide assumption and requirement. Appendix 4 gives a summary of requirements arising from the 2019 study.

11. Therefore, the policy requirement is supported and will continue to be informed by an up to date local evidence base which assesses the housing needs of different groups in the community (including at localised levels) as required by NPPF paragraph 61. The needs of travellers are covered separately in Policy 12 and via a separate evidence base.

**Q6.3. Is the inclusion of Appendix 4 in the Plan justified and consistent with the wording of policy 8? Will it be effective in helping to ensure that the need for different types of homes in different parts of the Borough are met throughout the Plan period?**

12. Please note, the response to Question 6.2 above and the Main Modification to remove the reference to ‘price’ from Part A of Policy 8 which is also relevant to this question. The following response assumes that this Main Modification has been proposed and accepted.

13. Policy 8A requires new developments to deliver a mix of house types and sizes to address the needs and market demand identified in the latest Housing Needs Study. Appendix 4 is a summary of that needs evidence taken from the latest Housing Needs Study 2019 (SDEB24.1 & 24.2) so will go some way towards providing applicants with a starting point for establishing what may be an appropriate and justified housing mix from the outset, including where certain house types are already over supplied.

14. The Council accepts that such information is only ever ‘point-in time’ and will date, but this is less problematic in the context of local plans having to be reviewed at least once every 5 years, which is a not too dissimilar timescale for reviewing Housing Needs Assessments anyway, meaning the Appendix could be revised through a plan review. The policy (Part A) also makes clear housing mix can be considered based on “other robust evidence” which acknowledges it may not always be appropriate to use the Housing Needs Study findings.

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\(^5\) SDEB24.1 Housing Needs Study
15. Inclusion of Appendix 4 goes some way to ensure that the need for different types of homes in different parts of the borough is met throughout the plan period. The data shows that, although there is some variation across the Borough, the greatest need is for larger 3 and 4+ bedroom housing. Together these account for a third of the housing types required overall. There is also a notable requirement for 2 bed bungalows whilst flats form a lower amount of the housing required. The Council considers inclusion of Appendix 4 will make the policy far more effective in terms of meeting such needs than a Local Plan that excludes such detail and leaves the applicant and decision maker having to find such details in supporting evidence base documents which are often, by their very nature, lengthy documents. It is also clear that the policy is not overly prescriptive and that the data is indicative and point-in-time.

**Affordable housing**

<table>
<thead>
<tr>
<th>Q6.4. Are the requirements of policy 8 part B for housing sites of 15 or more homes (or 0.5 hectares or above) to normally include 23% affordable homes in high value housing market areas or 15% elsewhere justified by adequate, proportionate and up to date evidence about need and viability?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes. NPPF paragraph 61 requires policies to take into account the housing needs of different groups, including those that require affordable housing. Policy 8 Part B (Delivering the necessary range of housing) fulfils this requirement with the 23%/15% affordable housing requirement for sites 15+ units (0.5ha). The policy has been informed by an up-to-date Housing Needs Survey 2019. The Housing Topic Paper also provides a summary of the Study in respect to affordable housing.</td>
</tr>
</tbody>
</table>

17. This Housing Needs Study evidence identifies that there is a net affordable housing need of 209 dwellings per annum (see summary Table 5.5 on page 74 for details). This figure has been derived through a 4-stage process and analysis of the next 5-years (2019-2024). Stage 1 identifies current affordable housing need, as well as taking into account affordability of open market price and rents. Stage 2 factors in future need, such as new household formation rates. Stage 3 then looks at the supply of affordable housing, including scheduled additions from our Council House Build Programme, those occupied by households in need and annual supply of social re-lets. Stage 4 off-sets this supply (stage 3) from total need (stage 1 & 2) to give a net annual shortfall of 209dpa. In the absence of any updated information, this should be extrapolated forward for the Local Plan's plan period. It is important to note that the Affordable Housing Need calculation (AHN) was not done at the base date of the plan (2015) but in late 2018/early 2019. As such, the expected/scheduled affordable units at that time of the assessment were factored

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6 SDEB24.1 Housing Needs Study 2019 - Table 5.5 on page 74  
7 DMBC4 Housing Topic Paper 4 – Housing 2020 – section 6.2 pages 60-63
into the calculation of the net 209dpa which may not have been made clear through the Council’s response to the Preliminary Questions (PQ34).8

18. Of the overall housing target (920dpa) there is greatest need for 3-bed houses (47%); and 23% bungalows. There is significant variation in net AHN across different settlements ranging from a net need of 60+dpa each in Lower Wheatley and Balby; to a net surplus of 70+dpa each in Town Centre and Mexborough. The size/type mix in each settlement also varies across the Borough - in some areas, the need is focussed towards 3-bed houses, for others it’s 1-2 bed bungalows. At least 75% of all affordable units should be available for rent, and the remainder available for shared ownership.

19. In addition to the information gained through the Housing Needs Study, the Council has a wealth of information from its Housing Register, which can also be utilised as part of a wider evidence base upon which to inform future development and interventions.

20. At the end of July 2019, 9,648 applicants were registered on Doncaster Council’s Housing Register. Applicants interested in bidding for social housing, including some housing association accommodation, are required to be on the register prior to bidding for advertised properties. During the 12 months ending July 2019, 1,665 properties were advertised through the Choice Based Lettings process. A total of 80,398 bids were received, equivalent of an average of 48 bids for every vacant property.

21. In addition to the evidence on need, the Council has taken into account whole plan viability when deriving at the affordable housing requirement figures. See response to Matter 1 and Question 1.13 for further details. In brief, the affordable housing requirement of Policy 8 Part B, and the variable rates approach that is being taken forward, is a viability-evidence led policy approach and is in line with NPPF paragraph 34 and PPG and therefore both consistent with national policy and justified by the up-to-date and robust evidence.

22. In terms of supply, the Council’s response to PQ349 identifies an affordable housing supply for the plan period of 3,185 dwellings (and up to 3,461 dwellings if the housing at the Airport in line with Policy 7 comes forward). This is broken down as follows (Table 6.4), with the details in PQ34 and the supporting Appendix PQ34.

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8 DMBC7 Doncaster Council Response to Preliminary Questions - 2nd June 2020
9 DMBC7 Doncaster Council Response to Preliminary Questions - 2nd June 2020
Table 6.4: Plan Period Affordable Housing Supply

<table>
<thead>
<tr>
<th>Source</th>
<th>Affordable Housing Supply (Units)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Completions first 4 years of the plan period (1st April 2015 – 31st March 2019)</td>
<td>704</td>
</tr>
<tr>
<td>Permissioned Supply (Commitments as at 1st April 2018 – Chapter 16 &amp; Tables H1(A-O) of Local Plan(^{10}))</td>
<td>1,009</td>
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<tr>
<td>Non-permissioned Allocations Supply (Chapter 16 &amp; Tables H2(A-Q) of Local Plan)</td>
<td>1,472</td>
</tr>
<tr>
<td><strong>SUB-TOTAL</strong></td>
<td><strong>3,185</strong></td>
</tr>
<tr>
<td>DSA Housing (Policy 7)</td>
<td>276</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>3,461</strong></td>
</tr>
</tbody>
</table>

23. It should be noted that this is highly likely to be an underestimate of overall affordable housing supply due to 3 main reasons:

- There is no allowance made for the Council’s own affordable housing delivery programme (other than where they are existing commitments and Council House Build Programme known at the point of the assessment being undertaken in late 2018/early 2019 and therefore already factored into the 209dpa ‘net’ need calculation). Since this time, the Council House Build Programme has been worked up further, including looking at ways of utilising around £100m against which we would seek to secure additional grant funding from, for example Homes England, to supplement the programme, especially in areas where the Housing Needs Survey identifies particular concentrations of need not likely to be met by the market and/or allocations in the plan as eluded to at paragraph 6.11 of the Local Plan itself;

- A number of permissions, in particular smaller schemes just above the 15 unit threshold, make commuted sums in lieu of direct on site provision to bring forward affordable housing (including to assist DMBC schemes mentioned above) elsewhere in the borough; and,

- A number of the larger permissioned sites have clawback and overage agreements written into the Section 106 Agreements which requires periodic review of viability at key triggers during the lifetime of these developments looking as to whether an affordable housing contribution could be secured at a later date.

24. In conclusion, Policy 8 Part B sets variable affordable housing rates for the Borough which have been informed firstly by an up-to-date Housing Needs Survey (209dpa or 23% requirement), but the requirement has been revised downwards to a lower 15% requirement for the lower value market areas of the Borough given the findings of the whole plan viability

\(^{10}\) Adjustments to avoid double counting with units delivered in 2018/19 and so included in the above supply already.
testing. Overall, the Council believes that affordable housing needs will be met through the Policy.

Q6.5. Is the reference in paragraph 6.9 to 75% of the affordable homes being for rent and 25% for low cost home ownership justified? Is it consistent with the national policy expectation that 10% of homes on major sites should be available for affordable home ownership? If the 75%/25% split is justified and consistent with national policy, should it be referred to in policy 8 rather than the reasoned justification?

25. The 75%/25% tenure split has been evidenced and is justified through the Housing Needs Study 2019\(^{11}\), in particular see paragraphs 5.26-5.28 on pages 75-76). The evidence has considered national policy, past trends in delivery and the relative affordability of alternative tenure options.

26. NPPF paragraph 64 requires housing sites 10+ units to provide at least 10% of the homes to be available for affordable home ownership (as part of the overall affordable housing contribution from the site). The Housing Needs Study 2019\(^{12}\) is clear that the 75%/25% tenure split identified satisfies this requirement of national policy (see paragraph 5.28 on page 75). The Whole Plan Viability Testing 2019\(^{13}\) does assume that at least 10% of all the dwellings on site are affordable home ownership, although the Council accepts that this could be made clearer in the evidence base. The Addendum to the Whole Plan Viability Testing 2020 evidence base, which was published as part of the Council’s response\(^{14}\) to the Inspector’s Preliminary Questions (see Appendix PQ32), is clearer that the 10% requirement of NPPF for affordable home ownership has been tested.

27. On reflection, the Council considers that the policy would be more effective were the tenure split identified above, and set out in the explanatory text at paragraph 6.9 of the Local Plan, be also included in the policy wording at Part B and would like to suggest the following Main Modification.

B) ...(including starter homes / discounted market sales housing which meet the definition in the NPPF) on-site. Of this, there should be a tenure split of around 75% affordable homes for rent (including social rent) and 25% intermediate low-cost home ownership. Proposals for affordable housing...

**Internal space standards**

Q6.6. Is the requirement in policy 46 part A for all new housing to meet the Nationally Described Space Standard as a minimum justified by adequate, proportionate and up to date evidence about need, viability and timing\(^{15}\)?

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\(^{11}\) SDEB24.1 Housing Needs Study 2019
\(^{12}\) SDEB24.1 Housing Needs Study 2019
\(^{13}\) SDEB48.1-48.3 Whole Plan Viability Testing 2019 & Appendices
\(^{14}\) DMBC7 Doncaster Council Response to Preliminary Questions - 2nd June 2020
\(^{15}\) OTH41 PPG ID:56-020-20150327.
28. The Housing Design Standards Policy Evidence Paper\textsuperscript{16} outlines in detail the evidence and the justification for the requirement of all new housing to meet the Nationally Described Space Standards. This evidence base was constructed with the methodology outlined in PPG\textsuperscript{17} in mind to address need, viability and timing.

29. When evidencing the need for the requirement, the Housing Design Standards Policy Evidence Paper showcases a variety of data sources including Doncaster planning applications, national research papers, Housing Needs Surveys\textsuperscript{18} and Government statistics which demonstrate for need across a variety of factors. Issues such as: density, ventilation, dwelling occupancy, storage, overcrowding, education, health, housing and accessibility are discussed in relation to the impacts of space standards. This was supplemented with a detailed analysis of a percentage of new builds in Doncaster to demonstrate discrepancies in standards between what the market is current building and the Nationally Described Space Standard. This analysis, including the methodology used and further justification can be found between pages 77-89 with summary statements on pages 89-90.

30. When assessing viability, pages 90-93 of the Housing Design Standards Policy Evidence Paper outlines a broad analysis of the potential impact to supplement the findings within Whole Plan Viability Testing 2019\textsuperscript{19} and Whole Plan Viability Testing 2016\textsuperscript{20} and considers the impact on affordability on pages 93-96. This meets more than the minimum justification required in the above referenced PPG.

31. When determining timing, Housing Design Standards Policy Evidence Paper\textsuperscript{21} clearly outlines a justified position by the Council on page 97.

\textbf{Housing for older people and people with disabilities}

\begin{tabular}{|c|}
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Q6.7. Is the requirement in policy 8 part C for developers to demonstrate how the provision of housing types suitable for older people can be increased, especially bungalows, extra care facilities and supported living accommodation, justified? \\
\hline
\end{tabular}

32. Yes. Policy 8D specifically offers support to proposals that increase the supply of bungalows, extra care facilities and supported living accommodation. NPPF paragraphs 59 and 61 are clear that the needs of groups with specific housing requirements are addressed and reflected in planning policies, including older people and people with disabilities. The

\textsuperscript{16} SDEB25 Housing Design Standards Policy Evidence Paper
\textsuperscript{17} OTH41 PPG Para 020 ID: 56-020-20150327 (27.03.15)
\textsuperscript{18} SDEB23.1 Housing Needs Survey 2015 & SDEB24.1 Housing Needs Study 2019
\textsuperscript{19} SDEB48.1 Whole Plan Viability Testing 2019
\textsuperscript{20} SDEB49 Whole Plan Viability Testing 2016
\textsuperscript{21} SDEB25 Housing Design Standards Policy Evidence Paper
need for such a policy is justified by the Housing Needs Study 2019\textsuperscript{22} and the Doncaster Housing Design Standards evidence paper\textsuperscript{23}.

33. By the end of the plan period there is projected to be a significant increase in both population and the percentage of population aged 65 years and over and that these could account for nearly a quarter of the Borough’s population. As the number of people aged 65 or over increases, so too does the number of people projected to reach older ages, including the number of people aged both 75+ and 85+. Long term health problems or disabilities (LTHPD) are not limited to those over 65 years of age, although the data shows it is more prevalent amongst this demographic. 21% of the Borough is thought to be suffering from LTHPD. By the end of the plan period it is expected that 25% of the Borough’s population will be suffering from a LTHPD. As set out in the response to Question 6.3 above, the Study finds that there is a notable need for bungalows accounting for 22% of the overall requirement. There is clearly an expectation amongst older people from the Study that they will be able to downsize which in turn will free up family housing for other buyers or renters.

34. There is a growing national focus on people being able to live at home as long as possible and this can only be facilitated if there is a sufficient supply of suitable, or adaptable, housing. Policy 8D will assist with this objective, alongside other Local Plan policies such as Policy 6 (Housing Allocations) and Policy 46 (Housing Standards).

Q6.8. Is the requirement in policy 46 part B for at least 65% of all new homes on developments of over 0.5 hectares or 10 or more units to meet Building Regulation standard M4(2) justified by adequate, proportionate and up to date evidence about need, viability and site specific factors such as vulnerability to flooding, site topography, and other circumstances\textsuperscript{24}?

35. The Housing Design Standards Policy Evidence Paper\textsuperscript{25} sets out in detail the evidence outlining the justification for the requirement for 65% of new housing to meet Building Regulations M4(2). This evidence base was constructed with the methodology outlined in PPG\textsuperscript{26} in mind which addresses need, viability and timing. The Paper\textsuperscript{27} uses a variety of data sources across pages 10-57 and summarised on pages 69-71, derived from national statistics, research papers from credible national organisations, Housing Needs Survey 2015\textsuperscript{28} and Housing Needs Study 2019\textsuperscript{29}, supplemented with local data to ensure Doncaster need is demonstrated adequately and effectively. It has done this with NPPF\textsuperscript{30},

\begin{flushleft}
\textsuperscript{22} SDEB24.1 Housing Needs Study & SDEB24.2 Housing Needs Study Appendix
\textsuperscript{23} SDEB25 Housing Design Standards Policy Evidence Paper
\textsuperscript{24} OTH41 PPG ID:63-009-20190626 and PPG ID:56-007-20150327 and 56-008-20160519.
\textsuperscript{25} SDEB25 Housing Design Standards Policy Evidence Paper
\textsuperscript{26} OTH41 PPG Para 007 ID: 56-007-20150327 (27.03.15)
\textsuperscript{27} SDEB25 - Housing Design Standards Policy Evidence Paper
\textsuperscript{28} SDEB23.1 - Housing Needs Survey 2015
\textsuperscript{29} SDEB24.1 - Housing Needs Study 2019
\textsuperscript{30} NPPF 2019 (61) and footnote 46 p.39
\end{flushleft}
PPG$^{31}$ and Government$^{32}$ requirements in mind. These data sources are considered more than adequate, proportionate and up to date. Where a data source has a recent 2020 update, the numbers do not materially change the demonstrated need enough to change the policy requirement.

36. When determining viability the Housing Design Standards Policy Evidence Paper$^{33}$ outlines a broad assessment of the potential impacts on pages 58-60 as well as a wider financial justification based on social factors on pages 61-68 to supplement the findings within the Plan’s Whole Plan Viability Testing Reports$^{34}$. This more than meets the minimum justification required in the above referenced PPG$^{35}$. The Policy also has wording that does allow flexibility for viability to be considered on a site by site basis.

37. The Council are not planning to allocate for the identified housing need on flood risk sites. Any reserve sites in flood risk areas would need to include mitigation measures to address the risk. Sites which have been approved in flood risk areas have mitigation plans in place and built into their design, usually by increasing overall site levels and / or marginally increasing finished floor levels which should not create unfeasible level access constraints to thresholds of individual homes. Many of these sites already have detailed planning permission so the policy will not apply to them as the detailed design has been approved e.g. site 838. Like Doncaster generally, most of the allocation sites proposed are relatively flat so level access should not be a major challenge. A number of more topographically challenging sites have already received detailed planning permission so the policy will not apply to them e.g. sites 638 and 944. Some unbuilt sites and those without detailed planning permission could in theory have topographical challenges, e.g. sites 414, 154, 1048, but the exact extent of these is difficult to ascertain until a detailed layout is submitted plotting individual units, access arrangements and site levels.

38. The Council recognise both these potential flooding and topographical challenges in Policy 46 (penultimate para of policy) and para 12.30 of the associated policy explanation, which set out such exceptions whereby developers might demonstrate meeting the standards is not feasible or viable. This would also apply to reserve sites and windfall sites. It is therefore considered that the policy provides sufficient flexibility to assess these issues on a site by site basis for the relatively small number of sites which may have an issue in meeting the accessibility standards.

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$^{31}$ PPG Para 004 ID: 63-004-20190626 (26.06.19) and PPG Para 005 ID: 63-005-20190626 (26.06.19)
$^{32}$ MHCLG (then DCLG) OTH62 Building regulations: guide to available disability data
$^{33}$ SDEB25 - Housing Design Standards Policy Evidence Paper
$^{34}$ SDEB49 Whole Plan Viability Testing 2016 and SDEB48.1 Whole Plan Viability Testing 2019
$^{35}$ OTH41 PPG Para 007 ID: 56-007-20150327
Q6.9. Is the requirement in policy 46 part C for at least 5% of all new homes on developments of over 0.5 hectares or 10 or more units to meet Building Regulation standard M4(3) justified by adequate, proportionate and up to date evidence about need, viability and site specific factors such as vulnerability to flooding, site topography, and other circumstances?

39. The Housing Design Standards Policy Evidence Paper\(^{36}\) sets out in detail the evidence outlining the justification for the requirement for 5% of new housing to meet Building Regulations M4(3) adaptable. This evidence base was constructed with the methodology outlined in PPG\(^{37}\) in mind which addresses need, viability and timing.

40. Within the Housing Design Standards Policy Evidence Paper\(^{38}\) alongside data sources used for justification for M4(2), there is demonstrated need identified for M4(3) adaptable dwellings in Doncaster. This has been summarised on pages 71-72. In paragraphs 2.75-2.78 it uses calculations derived internally using the Habinteg methodology, alongside those outlined in the Housing Needs Study 2019\(^{39}\) to help determine the policy requirement alongside the data sources, such as Disability Living Allowance.

41. Please refer to the response to Q6.8 above regarding viability and site specific factors.

Design of housing developments

Q6.10. Are the requirements in policies 42 to 45 relating to the design of housing developments justified? In particular:

a) The approach to “standardised or off the shelf” designs in policy 42 part B.

b) The requirement in policy 43 for all major developments to make use of pre application engagement with the Council, Design Review and urban design tools including masterplans, design guides, and design codes.

c) The requirement in policy 45 part D for all major developments to utilise Building for Life throughout the design process.

d) The requirement in policy 42 part D for the provision of public art in all major urban extensions and high profile and prominent developments, particularly in the key priority areas listed and shown on the Policies Map.

e) The requirements in policy 44 part C relating to all edge of settlement developments.

42. [Specific responses are made to parts a to e of Q6.10 below, after the following introductory response].

43. NPPF\(^{40}\) states that the creation of high quality buildings and places is fundamental to what the planning and development process should

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36 SDEB25 Housing Design Standards Policy Evidence Paper
37 OTH41 PPG Para 007 ID: 56-007-20150327
38 SDEB25 Housing Design Standards Policy Evidence Paper
39 SDEB24.1 Housing Needs Study 2019
40 OTH39 NPPF 2019, paragraph 148
achieve, and that being clear about design expectations, and how these will be tested, is essential for achieving this. The Local Plan objective 5\textsuperscript{41} seeks to ‘ensure our towns, suburbs, villages and countryside benefit from high quality appropriate development that reinforces distinctive and vibrant places’. NPPF\textsuperscript{42} states that plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. NPPF\textsuperscript{43} sets out the key outcomes planning policies should deliver in terms of design. PPG\textsuperscript{44} sets out the appropriate levels referred to in the NPPF and suggests planning policies can set out the design outcomes that development should pursue as well as the tools and processes that are expected to be used to embed good design. The policies in Chapter 12 of the Local Plan aim to achieve this by clearly setting out a framework of design expectations to secure high quality development.

44. In 2019 Place Alliance undertook a design quality audit of 142 housing developments across England\textsuperscript{45}, and from correlations with data on market, contextual and design governance factors, a number of conclusions were drawn. Although no sites were in Doncaster, it found today the design of new housing developments are still overwhelmingly ‘mediocre’ or ‘poor’ (three quarters of the audited projects), with ‘patchy’ practice, but most places have the potential to achieve good design. It found common design problems such as poor streetscapes, highway and parking design, little character or identity, and car dependent schemes. The Report recommends councils set clear design aspirations in policy, use established design tools, utilise Design Review Panels, and, echoing NPPF\textsuperscript{46}, refuse poor and mediocre design where this does not meet clearly defined design aspirations in policies and standards.

45. In this background, Policy 45 aims to encourage housing developments which respond positively to the context and character of existing areas (alongside Policy 42) and create high quality residential environments. At part A Policy 45 sets out the key well-established planning considerations to assess a development’s impact on neighbouring land uses, which are common development management considerations for whatever scale of proposal. Part B provides a framework of high level design principles as considerations to assess the design quality of residential development types and provide a strong steer to applicants on key design issues to address.

46. The design principles in part B of Policy 43 (all developments) and part B of Policy 45 (housing developments) reflect established objectives of good

\begin{footnotesize}
41 CSD3 Doncaster Local Plan 2015-2035 Regulation 19 Publication Version, paragraph 3.5, page 15
42 OTH39 NPPF 2019, paragraph 125
43 OTH39 NPPF 2019, paragraph 127
44 OTH41 PPG Para 002 ID: 26-002-20191001
46 OTH39 NPPF 2019, paragraph 130
\end{footnotesize}
urban design as also set out in the National Design Guide\(^{47}\). These include: accessibility and legibility (M1 and M2 of National Design Guide, page 23), continuity and enclosure of streets with active building elevations (B2- page 19, H2- page 39), street design and car parking (M3- page 24, P1-P3- pages 31-32), inclusivity (U3- page 36) appearance (I2 and I3- pages 15-16), good landscaping (M3- page 24, N3- page 28), space, storage and servicing (H3- page 40), etc. The principles at Part B of Policy 45 (residential design) also reflect Building for Life\(^{48}\) criteria given the requirements of Policy 45 D. In this way overarching good design objectives are translated into what is hopefully a more helpful, focused and less abstract set of key locally defined design principles specifically for residential development. Most of these principles are already encapsulated in the Council’s adopted SPD’s\(^{49}\) covering residential design, so have been effectively used to promote high quality housing for the past 5-10 years without any significant detriment to viability or deliverability.

47. The following specific responses are made to parts a to e of Q6.10.

| 47. | The approach to “standardised or off the shelf” designs in policy 42 part B. |
| a) | The approach to “standardised or off the shelf” designs in policy 42 part B. |

48. In addition to the above, NPPF\(^{50}\) states planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change. Policy 42 attempts to encourage developers to propose homes and buildings which are suited to local character or develop new distinctive developments with strong identity suited to the local area. It is not considered prescriptive in terms of outcomes, but focuses on process.

49. Representations\(^{51}\) (03431/ 04955 / 04956) suggest that some major developers have products which are capable of being adapted to suit local character, which is what the policy is trying to achieve. This reflects the Council’s experience that many builders have the scope to adapt designs to local character, but will often revert to standard designs used across the country if not encouraged to do so by policy. Part B of Policy 42 refers to part E to allow flexibility for standard designs if these are justified by a robust contextual design analysis, but unfortunately this is often lacking from planning applications. Policy 42 part B is not considered to be a stringent requirement, but reflects good practice in terms of contextual analysis and developing a design response suited to the local area. The

\(^{48}\) OTH65 Building for a Healthy Life (July 2020)  
\(^{49}\) OTH5 Development Guidance and Requirements SPD and OTH6 South Yorkshire Residential Design Guide SPD  
\(^{50}\) OTH39 NPPF 2019, paragraph 127c  
\(^{51}\) CSD11 Full Representations on the Local Plan Regulation 19 Publication Version, pages 823, 824, 825
National Design Guide\textsuperscript{52} and Building for Life\textsuperscript{53} reflect this approach. Historic England support Policy 42 in their 0016 representation\textsuperscript{54}.

b) The requirement in policy 43 for all major developments to make use of pre-application engagement with the Council, Design Review and urban design tools including masterplans, design guides, and design codes.

50. NPPF\textsuperscript{55} states that local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development, this includes community engagement, design review, and Building for Life\textsuperscript{56} which are also referenced in PPG\textsuperscript{57}. It encourages early advice to be sought and use of these tools early in the design process. The Council would concur with this approach and have much experience of successfully employing such tools on major developments and multi-phase schemes. The Carr Lodge Design Code SPD\textsuperscript{58} is just one example which utilised many of these tools and where the positive results can be seen on the ground. The well-established Doncaster Design Review Panel are part of the process, as encouraged by the NPPF\textsuperscript{59}.

51. Policy 43 seeks to clearly set out these tools and the criteria when they should be used, as a formalisation of the existing ‘good practice’ approach. The introductory paragraph in Policy 43 sets out the process and scale of development to which the requirements will be applied, and part C sets out the various tools available.

c) The requirement in policy 45 part D for all major developments to utilise Building for Life throughout the design process.

52. As stated above the PPG encourages use of Building for Life\textsuperscript{60} (BFL), and the Council recognises its use as a valuable and well established tool in helping secure good design. The existing adopted Core Strategy Policy CS14\textsuperscript{61} already requires major developments to meet Building for Life, so the proposed requirement in Policy 45 D represents a continuation of an established approach and use of BFL as a design tool. The Council would argue BFL has helped improve design quality since the Core Strategy adoption in 2012 without significant detriment to housebuilding (as evidenced by the Council’s track record in delivery of new homes). In the

\begin{thebibliography}{99}
\bibitem{52} OTH63 National Design Guide (2019), paragraphs 58-59, pages 15-16
\bibitem{53} OTH65 Building for a Healthy Life (July 2020), pages 44-49
\bibitem{54} CSD11 Full Representations on the Local Plan Regulation 19 Publication Version, page 822
\bibitem{55} OTH39 NPPF 2019, paragraph 129
\bibitem{56} OTH65 Building for a Healthy Life (July 2020)
\bibitem{58} OTH9 Carr Lodge Design Code SPD
\bibitem{59} OTH39 NPPF 2019, paragraph 129
\bibitem{60} OTH65 Building for a Healthy Life (July 2020)
\bibitem{61} OTH3 Adopted Core Strategy Development Plan Document (2012) paragraphs 6.1 and 6.4, Policy CS14, pages 70-71
\end{thebibliography}
Council’s experience Building for Life is recognised and accepted by most large house builders and is also one of the very few nationally established and well known tools available to monitor the quality of new housing developments. As such it has been used by CABE62 and more recently Place Alliance in recent National Design Quality Audits63.

53. Since the inspector published the MIQ’s, BFL has been updated and renamed as Building for a Healthy Life64 (BHL) with a greater emphasis on securing healthy places. It has been updated in partnership with Homes England, NHS England and the NHS Improvement. BHL integrates the findings of the three-year Healthy New Towns Programme led by NHS England and NHS Improvement. The changes from BFL to BHL are highlighted in pages 86-89 of the document, and are considered an evolution of the existing principles which still complement the principles of Policy 45 and other Local Plan policies. The fit with the NPPF and National Design Guide65 is set out on page 7 of the document. Pages 6, 8 and 9 of the document sets out how BHL is more effective when used throughout the design process in a collaborative way, as is the Council’s experience. Policy 45 part D reflects this by encouraging use of the tool throughout the process.

54. In order to reflect this update the Council propose the following modification of Policy 45 part D:

Major applications (of over 0.5 hectares or 10 or more residential units) which include housing should utilise Building for a Healthy Life throughout the design process, including at pre-application stage where the tool can be beneficial in helping shape high quality housing schemes.

And associated para 12.18 to: The design quality of major schemes should be shaped and assessed by using the Building for a Healthy Life criteria (or any subsequent revised national standard) in addition to the policy criteria above. A high quality scheme will perform well against all of Building for a Healthy Life criteria.

55. The requirement of sites to deliver public art is in accordance with NPPF paragraph 124 in helping to create high quality places, with good design and where people want to live and work. It provides an opportunity to add to the overall quality of an area, create visual attractiveness and create a strong sense of place in line with NPPF paragraph 127.

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64 OTH65 Building for a Healthy Life (July 2020)
56. It is not unusual for Local Plans to require provision of public art, or a ‘percentage toward art’ aspiration. The Doncaster Creative & Cultural Strategic Partnership (CCSP) have a shared vision to see all people who live, work, study and visit Doncaster taking part and enjoying great cultural experiences. Public Art is part of the cultural offer. The CCSP launched Doncaster’s first partnership owned Creative & Culture Strategy in 2016. Action 3 of the action plan under aim 1 (page 11) seeks to ‘embed art and culture in buildings and spaces across Doncaster, by integrating arts and culture into local plans’. The Council has a public art strategy which was approved by Cabinet 22.05.18. It seeks to enhance Doncaster’s cultural offer and exposure of local communities (particularly the more disadvantaged) to art. Pages 7 and 8 of the Strategy discuss the role planning can play in delivering public art.

57. Policy 42 (particularly parts C and D) are designed to help implement these aspirations. Not all sites are included, only those which may warrant art due to their location, prominence, intensity of footfall, or scale of development. Many of the sites identified in the Policy are Council owned and the requirement will apply equally to public sector led developments. In the absence of any existing planning policy for public art, through negotiation, the planning authority are already successfully facilitating the incorporation of art into the design of a number of recent public and private developments through the planning process, with no significant adverse effect on development viability noted.

58. Part C of Policy 44 is not considered prescriptive in terms of outcomes, using words such as ‘should’ and ‘can’. It reflects design aspirations of existing saved UDP policies (ENV4, ENV53) and Core Strategy Policy CS16(d). It seeks to draw attention to a specific important design issue (the visual and physical transition between urban and rural environments and character areas) and set out key considerations to guide a contextual design assessment as also identified in the Landscape Study. How the settlement edge is designed and landscaped is important in conserving and enhancing the character and identity of both adjacent urban and rural areas as aspired to under Local Plan objective. If the design process encouraged under policies 42-43 are undertaken properly as is good practice (see response to part A above- advocated in NPPF, PPG, National Design Guide, BHL) the contextual analysis will identify the most

| e) The requirements in policy 44 part C relating to all edge of settlement developments. |

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66 AE09 Creative and Culture Strategy 2016-2021 (2016)
68 OTH1 Adopted Unitary Development Plan pages 63, 100
69 OTH3 Adopted Core Strategy Development Plan Document page 75
70 SDEB36 Landscape Character Capacity Study, page 7 of part 3
71 CSD3 Doncaster Local Plan 2015-2035 Regulation 19 Publication Version, paragraph 3.5, page 15
appropriate design response to the settlement edge and in doing so the design should meet the spirit of Policy 44 part C.

**Backland and tandem development**

Q6.11. Is the approach to backland and tandem development set out in policy 45 part C justified? Are the Council’s suggested changes to the policy and the Policies Map necessary to make the Plan sound and would they be effective in so doing?

59. Please refer to introductory paragraph in response to Q6.10 above which sets the NPPF and PPG context for design policies. The Council have set out the reasons and justification for Policy 45 part C in the response to PQ4372 and below. As set out in the response, it is considered that a stronger policy approach will be more effective in maintaining and managing the character of the identified areas against inappropriate forms of development.

60. NPPF73 states that ‘plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area’. The specific parts of the Borough identified under Policy 45 part C are characterised by mature suburbs with leafy, low density, spacious, villa and semi-detached development often with exceptionally large or long gardens. They represent a specific character typography which is not widespread within the Borough and therefore require sensitive management. These areas often cater for aspirational ‘executive’ homes which are not widespread elsewhere, but are important in supporting the economic aspirations of Doncaster by providing housing of a type and density the modern market is unlikely to deliver in significant numbers, so to a degree irreplaceable. Increasingly these areas are coming under pressure for infill and backland development which is negatively changing the character of the areas and reducing this specific type of aspirational housing offer as explained in the text at paragraph 12.21 of the Local Plan.

61. The areas in Bessacarr identified above also broadly correlate to the existing 2 conservation areas. There is another area in Bessacarr outside the conservation areas which until relatively recently shared similar characteristics to those identified. This area is defined by Bawtry Road/Grange Road/Partridge Flat Road/Plumpton Park Road (see Figure 1 below). It has had significant redevelopment including a larger number of backland and tandem developments, which have altered the prevailing character to such a degree that these forms of development could now be considered part of the character of that specific area. For this reason it has been excluded from the Policies Map. This change in character has

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72 DMBC7 Doncaster Council Response to Preliminary Questions - 2nd June 2020
73 OTH39 NPPF 2019, paragraph 70
taken place despite having UDP policy and an adopted Residential Backland and Infill SPD\textsuperscript{74} which aimed to better control this form of development. It demonstrates what is likely to happen to the other areas identified under part C without a clearer protectionist policy approach in the Local Plan.

62. Part C aims to better manage the pressure for this form of development in the identified areas so that the existing prevailing character is maintained in line with NPPF paragraph 70. The aim of part C is to highlight there should be a general presumption against further backland/tandem development in these areas as by their nature that the form of development could be considered incongruous to the prevailing character of the areas referred to. It will allow the Council to better manage the possible piecemeal erosion of the character of the areas highlighted.

63. This is the logic reflected in an Inspector’s recent decision\textsuperscript{75} for a backland proposal at Warnington Drive, Bessacarr which is one of the character areas highlighted in part C.

"Despite my conclusions regarding the above, the proposal comprises an uncharacteristic tandem form of development on the appeal site. Whilst I

\textsuperscript{74} OTH8 Residential Backland and Infill Development SPD
\textsuperscript{75} AE14 Appeal Decision APP_F4410_W_19_3239619 - 47 Warnington Drive
recognise that it would appear historically that other backland redevelopment or infill developments have taken place within the area covered by the South Bessacarr Conservation Area, there is no evidence of a prevalence of such piecemeal or tandem development elsewhere in the vicinity. I accept that there is a certain degree of variation in plot sizes and widths across the wider Conservation Area, but there remains an absence of development within the long rear gardens of properties on the Northern side of Warnington Drive. This retained area of openness is a positive spatial characteristic of the SBCA, and to allow its erosion would result in an undoubted adverse impact on the existing openness of the appeal site, and the Conservation Area”76.

64. Likewise in another recent decision for a backland development at Park Drive, Sprotbrough (which is another of the areas highlighted in part C) the Inspector found that the proposals ...

"would be an intrusion of development that would be harmfully at odds with the prevailing character and pattern of adjacent residential plots that form the immediate and overriding context of the appeal site”77.

65. Edenthorpe78 and Sprotbrough79 Neighbourhood Plans are being progressed and both include policies and proposals relating to maintaining the character of the respective identified areas under part C. The Edenthorpe Neighbourhood Plan Submission Version (2019) has been recommended to proceed to referendum. It highlights the Thorne Road character area as being important to residents who were keen to see the character maintained (8.23), the Neighbourhood Plan Policy 5 is included to help manage this.

66. The Sprotbrough Neighbourhood Plan is at Regulation 14 (Pre-Submission Consultation and Publicity) stage. The first draft plan (Autumn 2018) includes a section relating to Backland and Infill development (paragraph 82) which describes the pressures and issues the community are experiencing from this form of development, and a draft policy with relevant design criteria which aim to better manage it. It is noted some of the criteria in the draft policy are quite restrictive and will be difficult for any backland/tandem development to achieve e.g. criteria 3 and 4 which say:

“3. The proposed building plot is of similar dimensions, in size and shape to the existing plots within the immediate locality. Proposals that would lead to over-development of a site or the appearance of cramming or tandem development generally will be resisted.

76 AE14 19/00023/REF - Appeal Dismissed 27.03.20, Paragraph 10
77 AE15 19/00021/REF - Appeal Dismissed 03.04.20, Paragraph 6
78 AE12 Edenthorpe Neighbourhood Plan Submission Version July 2019
79 AE13 Sprotbrough Neighbourhood Plan - Pre-Submission Version 2019
4. The site layout reflects the original development of the area. This is particularly important within older established residential areas where a uniformed plot layout and street-scene has been created”.

67. The Council’s suggested changes to Policy 45 and the Policies Map are necessary to make the Plan sound, as they will more clearly define those areas that will be stringently protected from backland and tandem forms of development making the Policy and accompanying criteria more effective.

**Green infrastructure, open space and landscaping in housing developments**

Q6.12. Are the requirements in policies 27, 29 and 49 relating to the provision of green infrastructure and open space and the landscaping of housing developments justified and would they be effective? In particular:

a) The requirement in policy 27 part A for all major developments of 30 or more family dwellings to provide a green infrastructure masterplan which demonstrates how ten specified criteria will be met. Is the Council’s suggested change to apply the requirement to all sites of one hectare or more necessary to make the Plan sound and, if so, is it justified?

b) The requirement in policy 29 for development to address open space deficiencies. If it is not sound, would the Council’s suggested change ensure that it is?

c) The requirement in policy 29 part A for developments of 20 or more family dwellings to provide 10% or 15% of the site as on site open space. If it is not sound, would the Council’s suggested change ensure that it is?

d) The requirement in policy 29 part B for developments of 20 or more family dwellings close to a large open space to provide a commuted sum of 10% or 15% of the residential land value of the development site. If it is not sound, would the Council’s suggested change ensure that it is?

e) The requirement in policy 29 part C for developments of between 10 and 20 family dwellings to provide for a commuted sum of 10% or 15% of the residential land value of the development site to improve existing open spaces within the vicinity of the site. If it is not sound, would the Council’s suggested change ensure that it is?

f) The requirement in policy 29 part D for 16 square metres of open space per person in retirement living schemes and/or aftercare facilities.

g) The requirement in policy 49 part C for generous tree, shrub and hedgerow planting and the reference in paragraph 12.38 to a minimum of one tree per dwelling.

68. [Specific responses are made to parts ‘a to g’ of Q6.12 below, after the introductory response in the next paragraph].
69. The justification for policies 27, 29 and 49 are in the NPPF and the Green Infrastructure and Open Space Policy Topic Paper, which evidences the national and local planning policy requirements, the Green Space Audit and the transition to the Local Plan policy. The purpose of the policies is to deliver, protect and improve green infrastructure, open spaces and provide appropriate landscaping in line with NPPF and PPG. Monitoring will be used to determining the effectiveness of all policies within the Local Plan. The Local Plan acknowledges that situations and circumstances change and commits to regular monitoring to determine effectiveness. An Annual Monitoring Report will track the progress of the Local Plan to determine the effectiveness in the document to meet with the overall plan objectives and implementation of policies.

a) The requirement in policy 27 part A for all major developments of 30 or more family dwellings to provide a green infrastructure masterplan which demonstrates how ten specified criteria will be met. Is the Council’s suggested change to apply the requirement to all sites of one hectare or more necessary to make the Plan sound and, if so, is it justified?

70. The amendment to Policy 27 part ‘A’ will make the plan sound by ensuring that all major development proposals (not just residential proposals) will contribute to Green Infrastructure. The justification for all the policies in this section is in NPPF as mentioned above in the first part of this response. The NPPF also specifies what ‘major development’ is and attributes a 1Ha size to non-residential development proposals. The Council’s current average housing density is 33 dwellings per hectare, which is a similar size to the original policy wording of 30 family dwellings. For brevity and clarification, the revised wording identified in the Council’s response to PQ41 will be used for both residential and non-residential major development proposals. A further amendment to Policy 27 part A1 is needed to complement the changes to Policy 29. The proposed amendment is to replace the word ‘deficiencies’ with the words ‘local need’. Policy 27, part A1 will then read ‘contributes toward delivering identified opportunities, priorities and address deficiencies local need;

b) The requirement in policy 29 for development to address open space deficiencies. If it is not sound, would the Council’s suggested change ensure that it is?

71. Yes, the suggested amendments to Policy 29 (as identified in the Council’s response to PQ41) will ensure the soundness of the policy in line with

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80 Policy 27: NPPF justification. Paragraphs 91, 92a, 98, 102c, 149, 157, 165, 170 a and b, 171, 174a,
81 Policy 29: NPPF justification. Paragraphs 11, 34 and 57, 83d, 92a, 96, 122a, 122e, 127e
82 Policy 49: NPPF justification. Paragraphs 122e, 125, 127a to d
83 DMBC6 Topic Paper 6 - Green Infrastructure and Open Space Policy
84 SDEB18 - Green Space Audit
85 See OTH NPPF Glossary, page 68
86 DMBC7 Doncaster Council Response to Preliminary Questions - 2nd June 2020
87 DMBC7 Doncaster Council Response to Preliminary Questions - 2nd June 2020
NPPF policies identified. The amended Policy 29 will provide a clear policy direction for developers and the Green Space Audit\(^\text{88}\) (and subsequent updates) will provide the open space evidence requirements. The Council acknowledges it is the role of the Green Space Audit to identify open space needs and allow the revised policy to work effectively. In the Council’s response to PQ41\(^\text{89}\) a change was suggested to the third sentence in paragraph 10.21. The Council would now like to delete this sentence in its entirety.

c) The requirement in policy 29 part A for developments of 20 or more family dwellings to provide 10% or 15% of the site as on site open space. If it is not sound, would the Council’s suggested change ensure that it is?

d) The requirement in policy 29 part B for developments of 20 or more family dwellings close to a large open space to provide a commuted sum of 10% or 15% of the residential land value of the development site. If it is not sound, would the Council’s suggested change ensure that it is?

72. The Council’s response to PQ41\(^\text{90}\) refers to the Green Infrastructure and Open Space Policy Topic Paper\(^\text{91}\), which acknowledges there is no nationally adopted standard from the provision of open space. The Green Space Audit\(^\text{92}\) measures five types of open space, all with different standards. To avoid confusion therefore the Council proposes to standardise the developer requirement to 15% on-site provision or equivalent value as a financial contribution and be directly related to new development proposals. This contribution will relate to the development and go toward the area of local need in the community (as identified in the Green Space Audit).

e) The requirement in policy 29 part C for developments of between 10 and 20 family dwellings to provide for a commuted sum of 10% or 15% of the residential land value of the development site to improve existing open spaces within the vicinity of the site. If it is not sound, would the Council’s suggested change ensure that it is?

73. The requirements of the NPPF\(^\text{93}\) are clear in that planning obligation is acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind. Standardising the developer requirement to 15% will make this process simpler and clearer for developers and the contribution will comply with NPPF paragraph 56. The Green Infrastructure and Open Space Policy Topic Paper\(^\text{94}\) provides information on the ‘green space standards’ and where these are derived from (see paragraphs 35 to 44 for information). On reviewing the information in the Topic Paper, the Council believes it is more appropriate

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88 SDEB18 - Green Space Audit
89 DMBC7 Doncaster Council Response to Preliminary Questions - 2nd June 2020
90 DMBC7 Doncaster Council Response to Preliminary Questions - 2nd June 2020
91 DMBC6 Topic Paper 6 - Green Infrastructure and Open Space Policy
92 SDEB18 - Green Space Audit
93 OTH39 NPPF paragraphs 55 and 56
94 DMBC6 Topic Paper 6 - Green Infrastructure and Open Space Policy
to have one standard value to benefit local need and alleviate pressures created by the new development. It will also be simpler and provide developers with clarity.

f) The requirement in policy 29 part D for 16 square metres of open space per person in retirement living schemes and/or aftercare facilities.

74. This figure is derived from the Fields in Trust 2.4Ha standard, this is an open space standard per thousand head of population and includes formal and informal open space. This figure is subdivided into 1.6Ha per thousand population for formal open space (16 square metres per person) and 0.8Ha per thousand population for informal children’s play. In the absence of any other standards, it was deemed appropriate to use this figure for retirement schemes and aftercare facilities as it allows for open space provision in a safe and secure environment, which can be designed specifically for the needs of older people.

g) The requirement in policy 49 part C for generous tree, shrub and hedgerow planting and the reference in paragraph 12.38 to a minimum of one tree per dwelling.

75. The positive health, well-being and financial value benefits of nature within urban areas are well documented and researched. This is reflected in the requirements of NPPF. PPG also flags nature as a characteristic of well-designed places and refers to the National Design Guide which highlights the importance of including nature, and specifically refers to natural and designed landscapes including trees, street trees, grass, planting and water (pages 26-27). This is reflected in the aspirations for ‘generous tree, shrub and hedge planting’ and the target for 1 tree per dwelling.

76. These requirements already form part of the Council’s adopted Development Guidance and Requirements SPD (sections 2.1, 2.3, 2.9 and 10 refer to generous landscaping and 1 tree per dwelling). Therefore these requirements have been applied to decision making since the SPD was adopted in 2015. It has not led to major viability issues or gained significant resistance from the development industry during the past 5 years, evidenced by the Council’s high rates of planning approvals and delivery of new development particularly housing. The Council would argue it has helped provide a clearer aspiration and related target in landscape terms and has resulted in better quality, ‘greener’ developments with greater emphasis given to nature and so has already proven to be effective.

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95 DMBC6 Topic Paper 6 - Green Infrastructure and Open Space Policy paragraphs 36 to 38
96 OTH39 NPPF, paragraph 127
97 OTH41 PPG Paragraph: 001 Reference ID: 26-001-20191001
99 OTH5 Development Guidance and Requirements SPD
77. The reality of any specific target such as the ‘1 tree per dwelling’ is that this has to be balanced by other design issues and policy requirements on a case by case basis, depending upon the specifics of the application proposal. The Council have proven to be pragmatic and flexible in this respect. For example, there are often developments with less than 1 tree per dwelling approved, but a satisfactory scheme has been negotiated which for example may include fewer, but larger native tree species which will deliver similar environmental benefits.

78. The positive health, well-being and financial value benefits of nature within urban areas are well documented and reflected in the requirements of NPPF paragraph 127. PPG\textsuperscript{100} also flags nature as a characteristic of well-designed places and refers to the National Design Guide\textsuperscript{101} which highlights the importance of including nature, and specifically refers to natural and designed landscapes including trees, street trees, grass, planting and water (pages 26-27). This is reflected in the aspirations for ‘generous tree, shrub and hedge planting’ and the target for 1 tree per dwelling. These requirements already form part of the Council’s adopted Development Guidance and Requirements SPD\textsuperscript{102} (sections 2.1, 2.3, 2.9 and 10 refer to generous landscaping and 1 tree per dwelling). These requirements have been applied to decision making since the SPD was adopted in 2015. It has not led to major viability issues or gained significant resistance from the development industry during the past 5 years, evidenced by the Council’s high rates of planning approvals and delivery of new development particularly housing. The Council would argue it has helped provide a clearer aspiration and related target in landscape terms and has resulted in better quality, ‘greener’ developments with greater emphasis given to nature. So has already proven to be effective.

**Health and education facilities in association with housing developments**

Q6.13. Are the development requirements set out in policy 51 aimed at improving and promoting strong, vibrant and healthy communities justified and will they be effective? In particular, is the meaning of the requirement in part D for relevant development proposals to consider and assess healthcare infrastructure implications clear?

79. The Council considers Policy 51 is justified in line with NPPF Chapter 8: Promoting Health and Safe Communities\textsuperscript{103}. The policy wording will be effective in delivering improvements that can positively improve health and wellbeing in Doncaster’s residents. Policy 66 sets out developer contributions, Policy 51 part d suggests that healthcare infrastructure implications of any relevant proposed development have been considered and addressed. This may include additional consultation with healthcare

\textsuperscript{100} OTH41 PPG Paragraph: 001 Reference ID: 26-001-20191001
\textsuperscript{101} OTH63 National Design Guide (2019)
\textsuperscript{102} OT5 Development Guidance and Requirements SPD
\textsuperscript{103} OTH39 NPPF Chapter 8, paragraph 91 a and c
providers to ensure the proposed development will improve and promote strong, vibrant and healthy communities in accordance with the NPPF social objective\textsuperscript{104}.

\begin{table}[h!]
\centering
\begin{tabular}{|p{5cm}|p{5cm}|p{5cm}|p{5cm}|}
\hline
Q6.14. Is the approach to the provision of education facilities in association with residential development set out in policy 53 part B clear, such that it will be effective? \\
\hline
80. NPPF paragraph 94 is clear that there should be a sufficient choice of school places available to meet the needs of existing and new communities and that the Council should take a proactive, positive and collaborative approach to meeting this requirement. Policy 53 part B could be applicable to allocated housing sites in the Plan, or windfall applications 20+ units in areas where school capacity is an issue. In the case of the former, the supporting development requirements (Local Plan Appendix 2) makes clear when a contribution towards education will be required. This is based on the assessment of sites undertaken by the Council’s Pupil Place Planning and Admissions Team as part of the SA technical work which assessed the impact on both primary and secondary school capacity from respective site options\textsuperscript{105}. This level of detail is considered to be sufficient and will ensure that the policy will be effective in line with NPPF.

81. Providing further details at plan-making stage (such as how much the contribution should be or what the contribution is to be used for) is not considered as being helpful given the lag between the time of the assessment and timing of a subsequent planning application. Over time, school catchments can and do change and details around site layout and mix of house types (not always known at plan-making stage and particularly so for large sites) can impact on the level of contribution needed. There is also the possibility that, following adoption of the Local Plan, the Council may move towards introducing CIL which would remove education contributions from Section 106 and include in the CIL anyway.

82. School capacity and contributions are therefore best assessed at the point of the planning application when Section 106 is identified as the mechanism for securing such contribution as per the current policy approach, and set out in Policy 66 (Developer Contributions). The Council’s viability evidence base\textsuperscript{106} has made a significant assumption around what the cost per dwelling towards education provision would be (circa £4,000/dwelling on sites 20+ units) and this is informed by the assessment undertaken by the School Places Admissions Team as part of the SA. The assessment looked at which pyramid of schools would be affected by a development and the projections for the future based on actual numbers of pupils currently on the role. A 5% allowance is factored in for contingency purposes and standard Department for Education costs

\begin{footnotesize}
\textsuperscript{104} OTH39 NPPF, paragraph 8b \\
\textsuperscript{105} CSD7.9 SA Report 2019 - Technical Appendix - Criteria 8Biii and 8Bvi - Primary Secondary Education Capacity \\
\textsuperscript{106} SDEB48.1 Whole Plan Viability Testing 2019
\end{footnotesize}
for primary and secondary school places to derive at a total education developer contribution.

**Pollution and noise affecting housing developments**

Q6.15. Are the requirements in policy 55 for mitigation measures relating to noise, air quality, water and artificial lighting justified in so far as they relate to residential development? In particular, are the noise standards in appendix 11 justified, and is the change suggested by the Council needed to ensure that the Plan is clear about how they are intended to be taken into account by decision makers?

83. Yes, the policy has been developed in line with national guidance and the Council considers requirements of Policy 55 to be justified in line with NPPF paragraphs 122 part e, 170 part e, 180, 181, 182, 183 and 204 part g.

84. For new residential developments, the noise standards set out in Appendix 11, are justified in line with PPG107. Appendix 11 contains more detail on acceptable local noise standards, builds on, and varies the noise exposure hierarchy from the PPG. The noise exposure hierarchy identified in *Planning Practice Guidance: Noise*108 Annex identifies measurable local values through which to determine the acceptability of noise sensitive proposals where noise exposure from transport is a factor.

**Telecommunications and utilities in housing developments**

Q6.16. Are the requirements in policy 22 for telecommunications and utilities infrastructure provision in housing developments justified and consistent with national policy? In particular, the requirement for connectivity to the fastest technically available broadband network unless this is not possible.

85. The requirements in Policy 22 for telecommunications and infrastructure provision in housing developments are justified and consistent with national policy.

86. The Local Plan site selection and allocation process ensures that the allocated sites would have access to essential utilities (Gas/Water/Electric). Consultation with utility providers raised no concerns with the potential location or number of new developments.

87. Connectivity to communications infrastructure and especially broadband is increasingly classed as essential infrastructure.

88. Policy 22 part B states that "all new housing and commercial developments must provide connectivity to the fastest technically unavailable broadband network except in the case of new developments where this is not possible."

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107 OTH41 PPG ID: 30-005-20190722
available broadband”. This is in line with requirements in the NPPF for
digital infrastructure and especially “full fibre connections to existing and
new developments” (NPPF paragraph 112) and support for “flexible
working practices” (NPPF paragraph 81)

89. The Council is actively involved in the ‘Superfast South Yorkshire’ and
‘City Fibre’ projects to bring the best available full fibre broadband
connectivity across the Borough. As at 2019, Doncaster has 97.2%
coverage for Superfast broadband. In 2019 Doncaster was chosen as one
of the next ‘Gigabit’ cities. This will enable full fibre to premises
connectivity which can result in much faster speeds than even Superfast
broadband.

90. Superfast South Yorkshire will act as a consultee on planning applications.
It is likely that the following condition will be placed on permissions:

‘Upon commencement of development details of measures to facilitate the
provision of gigabit-capable full fibre broadband for the
dwellings/development hereby permitted, including a timescale for
implementation, shall be submitted to and approved in writing by the
Local Planning Authority. The development shall be carried out in
accordance with the approved details.

REASON

To ensure that all new housing and commercial developments provide
connectivity to the fastest technically available Broadband network in line
with the NPPF (para. 112) and Policy 22 of the Doncaster Local Plan’.

91. In summary, the best available broadband technology is available or is
currently being implemented over most of Doncaster Borough. Any
existing and new developments should be able to be connected to at least
Superfast full fibre broadband. The NPFF paragraph 112 says policies
should prioritise full fibre connectivity to existing and new developments.
This priority is fulfilled by Policy 22 part B.