Doncaster Local Plan  
- Response by The Joint Rural Parishes  
September 2020

Name: The Joint Rural Parishes (JRP)  
Reference Number: 04013

Written Statement for Inspector on the Local Plan for Doncaster.

The Joint Rural Parishes (JRP) have contributed to all Consultation stages of the Local Plan for Doncaster and request that our contribution via these written statements be included for consideration by the Inspector at this stage of the consultation. We confirmed in July 2020 our wish to exercise our right to be heard and further confirmed (by email to the Local Plan Planning Officer Mrs Reeson on 4th Aug 2020) that owing to the Coronavirus’s ongoing health risks: - our decision is for our four representatives to participate at the Local Plan Hearings, Online.


Public consultation and engagement.

Q1.2 Is there any substantive evidence to demonstrate that the public consultation carried out during the plan-making process failed to comply with the Council’s Statement of Community Involvement or legal requirements?

Q1.3. Was the Plan shaped by early, proportionate and effective engagement with communities, local organisations, businesses, infrastructure providers and operators and statutory consultees?

Past Consultation

In previous consultation feedback over 75% of responds supported a greener Doncaster.

Significant support was also given to meeting the Borough’s housing needs outside of the Green Belt as far as was possible.

Consultation feedback also strongly supported bringing vacant buildings back into residential use; the use of brownfield sites and for redundant sites to be used for development, in preference to using Green Belt.

It is acknowledged that affordable housing is needed, however, it has to be understood that rural communities cannot deliver the required supporting amenities and services eg public transport, employment opportunities, health, education and retail provision.
Issues and Options Report 2015, feedback reflected that Options 1 & 2 performed most strongly. These options preferred that the Local Plan focus on the larger settlements with better service levels, increased accessibility and reducing reliance and likelihood of car use, to deliver a sustainable Plan.

Changes to Plan and u-turns were not communicated or made available to the public until August 2019 when the Plan was published for ‘Soundness’.

We note that additional changes and amendments to proposals have been made, again without prior consultation, which are now included in documents submitted by DMBC to the Inspector for examination.

As novices in this process, we have sought to present our comment under the correct Matters, as best we can, and we seek your indulgence, if we have perhaps not been entirely successful in our endeavours.

In order to deliver a robust Local Plan, we use the consultation as an opportunity to comment on the many new changes and their potential impact, and we apologise in advance for the length of our comments.

Previously, the consultation was for the Defined Villages to be ‘washed over Greenbelt’ – In the Published version, this was reversed and removed, with no consultation on the proposed changes for inclusion in the final version of the Local Plan.

At all stages of the consultations – we were told and given written advice that only ‘Infill’ would be appropriate for the Defined Villages. We fully supported this – In the final published version of the Local Plan it now states: ‘Infill, affordable housing, appropriate development’ – we have consistently raised our concerns and objections that there is no evidence to support Affordable Housing in the Defined Villages. The majority of the now newly 40 Defined Villages have little to no amenities or services and therefore this type of development cannot be supported and cannot be considered Sustainable.

The Council has demonstrated in their evidence based HELAA document that there is a surplus of Housing Development land available and as such, the 920 annual housing target can easily be achieved & exceeded to deliver its Affordable Housing target. It is our view, that there is therefore, no need for further Affordable Housing allocations to be included or indeed, considered in the Defined Villages by the Council.

This cannot be justified, when considered against the reasonable alternatives and based on the proportionate evidence-provided by the Council. Consequently, there is no Justification.

The Local Plan, Policy 8: now states ‘Housing sites of 15 or more homes (or 0.5ha or above) will normally be expected to include 23% affordable homes in the Borough’s high value housing market areas or a lower requirement of 15% elsewhere in the Borough. Proposals for affordable housing on developments of less than 15 units will be supported where these meet other development plan polices’.
The JRP notes – that now in the overarching policies, the Plan hierarchy does not allocate housing development targets for the smaller Defined Villages but suggests, that 4-5 new homes might be delivered through windfalls.

By definition, this is directly contradictory. Affordable housing in the Defined Villages cannot be considered sustainable as there is an acknowledged absence of services and amenity provisions, nor are any major developments expected to be delivered where a percentage can be attributed to affordable housing. As such, the JRP cannot see how the inclusion of affordable housing in the 40 smaller Defined villages can be considered justified or sound.

Windfalls will not be counted against the new housing delivery target.

The JRP contend – that affordable housing is not only unsustainable but, when there is no expectation of development, this directly contradicts Policy 8. However, even if all of the 4-5 windfalls did deliver affordable housing, as per the current Policies – none of these would count towards the delivery of the Borough’s affordable housing targets or indeed any of its housing target.

Additionally, ‘appropriate development’ has now been included within the wording of the Local Plan. We advocate, that there needs to be a concise explanation of what constitutes ‘appropriate development ‘in the Conservation and Greenbelt rural villages? The statement in itself is too vague for interpretation.

Does it mean ‘Appropriate development’ as per the NPPF 145 & 146? Is this consistent with National Policy? Which states ‘A Local Planning Authority should regard the construction of new buildings as ‘inappropriate in the Green Belt’. Exceptions to this are’: - it then goes on to list what the exceptions are e.g. buildings for agricultural etc.

Clarity in this matter is much needed for the Plan to be effective, sound and consistent with National Policy.

We have stated in every response to Consultation submissions, that the Local Plan is very much Landowner and Developer led.

We maintain, that there has been poor encouragement to engage the public in participating and responding to the Local Plan Consultations.

Overall, the number of responses remain extremely low with the vast majority of respondents being mainly Landowners, Developers or their agents, businesses, statutory consultees and key stakeholders.

The numbers from the Council’s Statement of Consultation and Statement of Community Involvement show that ……… ‘The Local Plan consultation database already includes a wide cross section of groups and individuals (2,500 +).

This may very well be the case. However, we would stress that only a small percentage of this database actually responded to any of the consultation stages of the Local Plan.
The largest volume of responses was made as a result of advertising site plans in the Proposed Sites consultation in 2018. DMBC acknowledge this attracted an additional 600 responses compared to previous consultations.

We consider this statement to be very misleading since it intimates 2,500 responses, when clearly this was not the case.

**Number of responses to each stage of Consultation:**

- **Vision, Aims, Objectives, Issues and Options (13th July – 7th Sept 2015) = 610** responses which represented 0.2% of the Borough population.
- **Homes and Settlements (7th March – 18th April 2016) = 157** responses representing 0.05% of the pop with 19% from Agents rep/Landowners and Developers.
- **Draft Policies and Proposed Sites (13th Sept – 26th Oct 2018) = 1,200** responses representing 0.4% of pop with 12% from Landowners/Developers/Agents.
- **Local Plan Draft Publication (12th Aug – 30th Sept 2019) = 209** responses + 5 petitions representing 0.07% of the pop with 78% (166) from Organisations with the largest number of these being from Landowners/Developers or their Agents.
- **Participation Inspectors Examination consultation (Sept/Oct 2020) = 59** responses which represents 0.02% of the Borough pop with the vast majority from Landowners, Developers or their Agents and a few statutory consultees.

We acknowledge the difficulty in producing the Local Plan. However, on numerous occasions in our responses to the Council, we have requested that new evidence-based documents be made available to the Public as soon as possible when they have been completed, to make it easier for residents to participate.

Unfortunately, this has not been the case and historically over the consultation periods in the creation of the Local Plan we have experienced the opposite, a deluge of very lengthy documents made available to the Public all at once.

This has made the Consultations process more onerous for communities and its residents, as reviewing and digesting thousands of pages prior to responding, has had the opposite effect of encouraging engagement.

We suspect in most cases, the vast amount of information and volume of data has turned people off and as a result, very few have submitted their views or responded in any way to the proposals in the Local Plan.

No summaries of the Council’s proposals for the Local Plan have been forthcoming or published in the Local Press to encourage participation by communities. Only a single article in 2016 was placed in the local press about the creation of a new Local Plan for Doncaster.

We do not consider that the Plan was shaped by early, proportionate or effective engagement with local communities and organisations.
Developer contributions and viability assessments at planning application stage.

We maintain that Developer contributions, whether Section 106 money or the new Community Infrastructure Levy, should be spent in the communities which are directly impacted by the development.

These levies, when applied, are intended to make appropriate contributions by the developer towards the creation of services, amenities, school places and infrastructure that are needed by the community as a direct result of the development in that area. As such, they are justifiable and these contributions must be allocated to supporting the sustainability of the development within that community.

In our view, an applied levy cannot be considered justifiable, if consequently, the funding is not then allocated and spent in that community.

Policy 66: ‘The Council has suggested a change to part A to include an additional criterion referring to pooled contributions to reflect a recent change to the Community Infrastructure Levy Regulations’.

As stated in our previous submissions, when the Local Plan is adopted, the Council will have a Master Plan of proposed development sites. This will provide an opportunity to fully assess, calculate and recognise the cumulative impact of those developments, rather than how it is now, where impacts are submitted by each individual developer and no cumulative affect is acknowledged or recognised.

Since the Council has considerable development ambitions for the duration of the Plan it would seem prudent for the Council to endorse pooled contributions to establish and understand the full cumulative development implications eg; Road Traffic volume assessment and infrastructure.

Knowing the extent that any cumulative impact will create means that the Council will be better informed about the remedial actions needed and the associated cost of mitigation provision. This should make the process much easier by providing a clear contribution and Levy amount that will be required by individual developers.

In this instance the JRP would continue to advocate for pooled contributions to reflect and address cumulative impact from planned development.

The changes to the Community Infrastructure Levy Regulations are currently out to Consultation. The resulting feedback and outcome of the proposed changes are therefore unknown at this stage of the Local Plan.

The JRP would like a commitment from the Council that it will engage in a Public Consultation on the changes to the Community Infrastructure Levy Regulations and on its proposal for adoption and implementation, along with clearly defining the implications of how this will affect the Local Plan, currently under examination.
Proposed changes to the NPPF.

Changes proposed to National Planning are currently out to consultation and may include and require identification of Growth, Renewal and Protection areas/sites within the Borough.

The resulting feedback and outcome of the proposed changes are therefore unknown at this stage of the Local Plan.

The JRP would like a commitment from the Council that it will engage in a Public Consultation on how it will propose adoption and implementation of any changes made to the NPPF, along with clearly defined implications of how this will affect the Local Plan, currently under examination

Matter 2. Quality of Development needed in the Borough

Housing requirement for the Plan period 2015 to 2035

To avoid duplication - Comments on this Matter are made throughout and across our response to different Matters.

Employment Land

To avoid duplication – Comments on this Matter are made throughout and across our response to different Matters, with main focus combined with Matter 8.

High Melton: High Melton is a small Green Belt conservation village in the west of Doncaster. There is a college site located in the village in Green Belt. In July 2015 the college was operational as outlined in Doncaster Infra Structure Strategy Annex, Education Learning Chapter 2 pages 15 2.22. Since this time the college has been closed for the last 4-years, with the last students leaving in July 2016. The site was put up for sale and in 2017, with 360 Degrees Media being the preferred bidder.

The bidder secured a grant from the Sheffield City Region for £4.1 million with Doncaster Council contributing £2.1 million of the grant with the intention to build sound studios.

As the time period has now expired the bidder has subsequently lost this grant funding.

Since DMBC, previously agreed to contribute £2.1 million to this venture, implying that tacit agreement was given and that planning approval would be granted, ensuring that the company had confidence in their plans to purchase the site, these decisions have raised a number of concerns within the JRP, namely;

- In principle or tacit approval of this project by the Council on this site,
- Promoting Housing and Educational space for Employment development,
- No exceptional circumstances demonstrated for development on Green Belt
- No prior consultation with residents, community or Parish Council,
- No reference given to said community on the need for permission from the Secretary of State.
We consider, if the proposed Local Plan for Doncaster is adopted, then the current development proposal for this site is contrary to NPPF and Green Belt Policy 2.6.13 of the Local Plan, which states: there are no exceptional circumstances for releasing Green Belt land for employment purposes in Doncaster.

Since the building of sound studios cannot be considered housing, we maintain employment and new business proposed for this site, must and should be redirected to brownfield land.

We advocate, it is necessary to have clarity on the issues raised for this site within the LP, to ensure it is consistent with national policy.

Unfortunately, the decisions made to date over the development of this site, only goes to strengthen the points and comments we make over the input in the creation of the Local Plan in Matter 1: Developer and Landowner’s interests have been given priority over the wishes and needs of communities and residents.

**Matter 3. Strategic Approach**

**Spatial strategy and Defined Villages and Countryside**

To avoid duplication – Comments on this Matter are made throughout and across our response to different Matters.

**Matter 4. Green Belt**

**Stage 2 Site Assessments**

The assessment was submitted through the ‘Call for Sites’. The test for removing Green Belt land under exceptional circumstances was assessed in two ways, strength of resultant boundaries and the five purposes of Green Belt (NPPF para 134) giving a score of weak to strong in assessing the sites proposed for development. It states these results will not be the only test for justifying exceptional circumstances. Each individual site needs to show that all other tests and considerations, including community interest and benefits, have been met.

The JRP contest that this has not been demonstrated or met.

**Boundary Strength**

The Green Belt is there to provide protection from development. According to the Planning Authority and The Green Belt Review, lack of a defined boundary seems to be an argument for extending settlements until a strong boundary is reached.

The history and nature of settlement patterns in Doncaster, rural exceptions, brownfield sites all conspire to soften boundaries. Indeed, good design and landscaping all soften boundaries.

As the analysis predominantly utilises one metric for appraising a level of afforded protection – ‘boundary strength’, seeking to impose such a measure is a wholly unreasonable way to ascertain and assess the strength of a Green Belt site.
We strongly believe this argument prejudices any analysis based on such a metric. It will also conspire to undermine the strength and protection of the Green Belt in the future as it facilitates a precedence for further land removal from Green Belt as softer boundaries are delivered around development in Green Belt.

It is **unjustifiable** to use this criterion as an argument to remove sites from Green Belt.

**Green Belt Boundaries**

Homes and Settlements (2016) and Settlement Background Paper 2018: states

1.3.13. The remaining 28 settlements, be they within green belt or countryside, were proposed to be washed over (included within) one of these two designations as appropriate.

1.3.14. This approach was revised following the conclusion of the 2018 Draft Policies and Proposed Site Consultation. A decision has been made to revert to the original 40 defined villages.

However, as shown in Policies 2 and 3 of the Local Plan, this differs from the original approach in the Homes and Settlements Paper where it was proposed that only ‘limited infill’ development would be permitted within defined villages. It now proposes that some development may be permitted in ‘appropriate’ locations, including ‘affordable housing’.

The proposed Plan submitted for examination, fundamentally changes the status of villages previously considered to be entirely within the Green Belt, without discussion or debate with appointed representative bodies i.e. Parish Councils or the JRP, and indeed, lessens the protection of these communities from inappropriate development and loss of Green Belt across the Borough, because the Council and the developer could claim that a ‘public interest’ benefit exists.

Furthermore, despite previously stating that no development would be permitted within these defined locations, development sites are now specifically included within the Borough’s development land and site availability and have even undergone further appraisal.

Evidence based document Page24 of Housing & Employment Site Selection Methodology Results Report 5.3.2 states *The Defined Villages are not supported as having an indicative housing allocation, or allocated housing sites, as they are not considered to be the most sustainable locations in line with national planning policy. Although infilling within settlement boundaries may be appropriate and supported through planning policy at the Defined Villages (as well as some potential extensions to some settlements in line with Policy 3, any such sites will be treated as windfalls and are not therefore contributing towards plan period supply to meet the Local Plan housing requirement; they would be an additional supply if an application can be determined positively in due course’*

This is contrary to previous published proposals. No opportunity for consultation regarding these changes has been offered.
Potential extensions to some settlements. Previously, the consultation was for ‘No Defined Development Limits’ for Smaller Defined Villages. However, the Plan now suggests that the ‘defined development limits’ of these villages in the Green Belt can potentially change through development extensions and that these will be treated as ‘windfalls’ as they are not contributing towards the LP housing requirement.

We contend, that if they are not a requirement and housing development in these Green belt locations will not count towards the LP housing requirement and target delivery, then there is by definition: no need, and therefore, no grounds which satisfy the criteria of ‘exceptional circumstances’ for extensions or windfalls.

This aligns with our feedback in our statement on Matter 7 of land in the Green Belt, which supports our warrant for clarity and a change of wording of this policy.

It is unclear how considerations for ‘appropriateness’ will be measured, since no other criteria have been provided; what determines ‘Public Interest’ for development in the Green Belt and how ‘affordable housing’ can be considered sustainable, when all the overwhelming evidence is to the contrary.

The JRP remain gravely concerned that the LP is already heavily weighted by the opinions of Developers & Landowners whose preference will always be to build on clean, virgin land, where profit margins are the greatest.

Policy C812, Part B relates to local affordable need and where small-scale Affordable Housing would be supported on Green Belt or Countryside. However, we note that, even if ‘exceptional circumstances’ are determined for some Green Belt sites e.g. 929 in Sprotbrough and 777 in Harlington – The Plan gives no assurance that these sites will deliver Affordable Housing at the ‘expected’ 23 percent, stated in Policy 8.

The JRP believe, Policy 8 is ambiguous and needs to be more clearly defined to address this.

See feedback on Affordable Housing under Matter 6.

Any development in a community should meet with the approval of people within it. Full participation and involvement in developing plans (including Neighbourhood Plans) ensure that those plans deliver what is in the best interests of those communities.

Sprotbrough - The proposed housing allocation sites 929, 788, 252 and 872 would extend the defined boundary of the village, encroaching on Green Belt. The allocation of 80 homes is 15 below the target figure for Sprotbrough. There is no justification for removing the land from Green Belt.

Additionally, the land on these sites is classified by DEFRA as Grade 2, the best and most versatile (BMV) agricultural land in Doncaster. It is hardly sustainable to remove land of this quality for building. Most especially, since no detailed assessment has been carried out by the Council on any of these sites in order to determine if any were of a lower grade, which would therefore provide a better alternative to development on BMV land. (Included in Matter 13).
The Parish Council’s submission suggests that 788 would be the best site for building homes, (should exceptional circumstances be demonstrated), as it would have the least impact on Green Belt.

The site proposed by the Council for removal from Green Belt in Sprotbrough is 929, which is not adjacent to urban development and is outside the Defined Development Limits of the village. This site is also contrary to NPPF 138 which states: ‘Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport’.

Site 788 is well-served by public transport, whereas, site 929 is not. Again, we maintain, the proposed development site 929, is in breach of national policy guidelines when better alternatives are available.

The NPPF 138: ‘When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt’. Based on national policy, the more urban Green Belt site 788 in Sprotborough, would meet the regulations more appropriately, if exceptional circumstances can be demonstrated for its removal.

The Plan sets new homes targets based on DMBC’s identified needs for towns and villages across the Borough. At no point in the Plan does it state or direct these allocations to be delivered in specific parts of a town or village.

There is no evidence base which dictates where pockets of development should take place or at a specific area within a village or town, except for available sites, which then direct where development might take place.

This site 929 does nothing more than extend the village by taking up agricultural land. The site has strong boundaries to the north and south, and softer hedgerow boundaries to the east and west. Development would precipitate erosion of Greenbelt as it would create a much softer boundary, thereby reducing boundary strength and its afforded protection.

In response to PQ10, the Council suggested the site would create a more defined boundary. The boundary is already strongly defined by roads and hedgerows.

In response to Inspector’s note 4, Qu 4.6, the Council’s response is not sound.

Harlington - Site 777 proposed for 66 homes is similarly located in Green Belt and has an agricultural land classification by DEFRA as Grade 3, which is good quality land.

As with the 929 Sprotborough site, similar issues are attributed to site 777 at Harlington.

The site proposed is not adjacent to urban development and is outside the Defined Development Limits of the village.
It is not served well by public transport and no detailed assessment has been carried out by the Council on the site in order to determine if any land has a lower agricultural grade and therefore a better alternative to the proposed development site.

Contrary to the NPPF and 2.1.8 para 138 which states justification for the use of Green Belt land should be that which is serviced by public transport.

Additionally, this site has a boundary next to a Flood Zone 2 as well as being adjacent to a Flood Storage area from the River Dearne (Environmental Agency Map 2020).

Banbrough and Harlington combined, have very few employment opportunities in the village and only have a few services. There are no shops or supermarket. The GP surgery and the only primary school are already operating at full capacity. There is only one bus an hour and no public transport in the Mexborough or Rotherham directions, which promotes car reliance, undermining DMBC’s own carbon reduction Policy. As residents will have to travel outside of the village for employment, leisure and to shop, this could hardly be considered ‘sustainable development’.

Service towns and Larger villages have a role to provide housing, employment, retail and other key services and facilities for the local area, however the majority of these services are not provided by these villages.

Policy 2 Spatial Strategic and Settlement Hierarchy (strategic policy) has a chart that shows growth is distributed as follows: Housing, Logistics, Light Industry and Manufacturing, Offices, Retail, Leisure, Culture and Tourism.

Since Barnburgh & Harlington show zero growth in all of these categories and do not have the requisite services to support housing development, in our view these villages should be re-classed within the Defined villages.

Despite very strong opposition from the Parish Council and residents, the authority has allocated 66 houses, thus showing disregard for the community and reaffirming an approach which is developer led, wholly at the expense of, and over the interests of the community, in order to deliver the LP.

Additionally: by taking more than is needed from the Green Belt to deliver +10% more homes – DMBC by its own admission acknowledge these are not needed, means that the over-delivery does not meet ‘exceptional circumstance’ criteria – which is contrary to the NPPF.

The delivery of 66 new homes exceeds the needs target of 60 for the village by +10%.

We maintain, in the first instance: there are no exceptional circumstances to remove Green Belt at this site. Furthermore: The LP states that the ‘over-supply’ will not contribute to the Borough’s housing target and will not be offset against any under-delivery, where Green Belt removal is planned in other areas.

If this is the case, any excess housing delivered in Green Belt locations not counting against the annual total for the Borough, will only serve to encourage developers to exceed the limits.

The JRP advocate this needs to be addressed.
The JRP advocate: If exceptional circumstance can be demonstrated to remove land from the Green Belt, then by definition, the entire development must contribute towards the Borough’s target, otherwise, it contravenes the NPPF.

The Green Belt review suggests a mixed strength boundary, and a moderately strong case for inclusion on boundary strength.

Nevertheless, it would again permanently remove BMV agricultural land from production, as with site 929 at Sprotbrough.

When releasing Green belt land planning conditions are even more important. Stronger instructions are needed eg. site 777 states a boundary is required, hedgerow or tall trees could be used. Developers are normally only responsible for 5 years leaving concern over what happens if these trees die or need attention.

Past experience in the borough is that the authority does not follow up on such projects, potentially leading to longer term boundary softening: this accords with issues we raised previously in relation to site 929.

Summary

We maintain no ‘exceptional circumstances’ have been demonstrated to remove land from the Green Belt nor has any ‘need’ been established to support this irreplaceable loss.

Doncaster’s housing need, produced using Government’s standard methodology, shows a recommendation of 585 new houses per year, combined with an over ambitious economic growth forecast, has resulted in a target of 920 houses per annum.

A prediction based on vision rather than evidence based. We maintain that the Economic Growth forecast is one which is unachievable and as such, necessitates annual monitoring and assessment of delivery. If the actual Economic Growth does not match that predicted in the LP, then by default, the annual new housing target must be reduced to reflect the true Economic Growth.

In this likely scenario, there would be no need to remove Green Belt to meet the delivery of the Boroughs housing needs – Annual monitoring of houses built, including windfalls, is essential in order to contain development, thus reducing the need for Green Belt release.

Government Policy is clear, the NPPF provides strong protection and defends against development in Green Belt.

To ensure National Policy is not undermined, we strongly advocate that no Green Belt is released until towards the end of the Plan period: following annual assessments on Economic need and the status of the current housing market. Without this modification, it makes the Plan unsound and not consistent with national policy.

Building on Green Belt is inappropriate and land should never be released while brownfield land and alternatives are available otherwise exceptional circumstances are not met and this is not consistent with national policy and consequently the LP does not meet the requisite test for of soundness as it cannot be justified.
Matter 5. Housing Supply

1). Needed Supply

In our previous responses to consultations the JRP has raised concerns over the targeted increase in housing supply, particularly the portion which derives from projected population and economic growth. Paragraphs 4.37 and 4.38 of the Local Plan state that Doncaster’s housing need has been assessed from evidence in the Economic Forecasts and Housing Needs Assessment (Peter Brett Associates, May 2018) and the earlier Doncaster Housing Need Assessment 2015 (partially updated 2016).

The 2016 update of the Housing Needs Assessment, using the Government’s Standard Housing Methodology, identifies a housing need in the Borough for 585 homes per year (baseline growth) over the plan period. In addition, to meet planned economic growth over the plan period, a further need for 327 homes per year is identified. This gives a total objectively assessed housing need (OAHN) of 912 new homes per year for the Borough once economic growth is taken into account.

Doncaster’s economic growth predictions are based on Sheffield City Region’s LEP, which takes a very optimistic approach to forecasting.

Section 2.1 of the Doncaster Housing Need Assessment 2015 states that “the SCR LEP jobs growth scenario is a challenging one—it represents a growth requirement for Doncaster that is 80% higher than the national average and makes the assumption that this growth requirement will continue until the end of the Local Plan period”, and “this OAN (Objectively Assessed Need figure) represents a housing need figure that is both ambitious (58% higher than the official government projection of 582 per year, and around 41% higher than the long term historic average demand (652 per year), and realistic – as shown by the potential jobs growth forecasted from forthcoming transformational projects”.

The JRP strongly questions how realistic the Council’s hopes for these transformational projects actually are, and consequently how justified the plan for over 300 additional homes per year is. Growth at 80% higher than the national average every year for 20 years seems more reminiscent of El Dorado than Doncaster.

The growth figures in the SCR LEP derive from a report by the consultancy Metro Dynamics and are clearly described as targets not predictions by them. The Peter Brett Associates Report (para 2.23) says of the Metro Dynamics figures “the targets do not use economic forecasts; the report makes it clear that they are aspirations rather than predictions” and quotes the Metro Dynamics report as saying ‘We believe that these targets will push Sheffield City Region to further improve its economy ... they are attainable, yet challenging. They will ensure that SCR continues to move forward, creating an economy that works for all its citizens. But they are targets, rather than predictions. They require significant policy interventions and economic investments to achieve them. All of them are set higher than what we believe would occur without changes, and are meant to encourage action towards them.’ In other words - they are wishes which may never come true.
The Sustainability Appraisal states that the SCR Strategic Economic Plan 2015 – 2025 aim is to create or deliver: 70,000 more jobs across the SCR in the 10-year Plan.

The SCR Common Ground (Jan 2020 update of this Plan) states of the 70k job target ‘... necessitates the SCR increasing its expected level of employment growth by more than 60%’. It would be difficult to argue that a 60% increase to achieve 70k over the 10-year Plan period was not a significant or challenging target to deliver.

However, Doncaster now aim to further increase its SCR apportioned Target, to 27,100.

The JRP note, that between 2015-2032 Doncaster now expects to deliver 27,100 new jobs from a 300k population and comparing this with Sheffield over the same period, who have set their target at 25,550 with a population of + 600k (double that of Doncaster), seems very disproportionate and is conceivably unattainable.

The JRP consider, this new increase in Doncaster’s target to be unrealistic, since its setting is based wholly on aspiration, with no evidence base to validate or to support that it can be delivered or is achievable - more especially since we are already 5-years into both the SCR and the Local Plan period.

In addition, the JRP can see no justification to ‘pro-rata’ or to extrapolate the new jobs target across a longer period, since a 60% increase is already a difficult challenge to deliver in the current SCR Plan. There are no documented or evidence based new targets yet set or agreed by the SCR for the following 10 years of a new Plan. In the absence of a crystal ball, the JRP advocate that an additional 15,275 new jobs to be delivered for the remaining years of the LP is not justified or sound.

Principle to establishing the new housing target for the LP is the expected Economic Growth and key to driving this, is the creation of additional new jobs. If the LP is and should be derived from the SCR Growth Plan, then the current 327 new houses per annum needs to be accurately reflected against and based on, the ambitious 60% increase in new jobs of 11,825 and not the unrealistic, unevideced and heavily inflated 27,100 ‘wished’ for new jobs.

DMBC fully participated in the creation of the SCR Growth Plan, in determining and setting of the 70k ambitious new jobs targets for itself and the Region.

We advocate, the creation of new jobs should be based on 11,825 and will be key to anticipating a potential economic growth and as such, the current planned housing targets of 327 per annum which is based on Economic Growth and the delivery of 27,100 additional new jobs - renders the Plan unjustified, unrealistic and unsound.

Based on what is still a very ambitious target, 11,825 equates to 1,182 per annum, multiplying this figure for a further 10 years of the LP, equates to an additional 11,825, with a resulting maximum target of 23,650 for the LP period.

The LP stipulates an additional 6,540 new homes (327 x 20 = 6,540) are needed to meet planned Economic Growth through the delivery of 27,100 new jobs – this gives a distribution ratio, where one new home is needed for every 4 new jobs created.
Clearly, if the jobs target is adjusted to 23,650, the Economic Growth and the corresponding need for new homes derived from this, must also be adjusted to reflect this change.

Using the ratio of 4:1 in the Local Plan - **3,450** fewer jobs created means that **862** fewer new homes will be needed.

The JRP advocate that this **needs to be addressed**.

In addition, some 5 years beyond the planned implementation date of 2015, the proposed Local Plan prepared by Doncaster Council is still based on economic, socio demographic and employment data and assumptions made prior to 2015. Furthermore, DMBC now propose to simply extend the plan by 5 years to 2030 based on this same data set.

The past 5 years have also seen a fundamental shift in the status of the UK, not only internationally but domestically.

The UK’s departure from the European Union, the continued impact of austerity and the ongoing challenges faced by regions, councils and communities, particularly in the north, have had a significant impact on the prosperity, employment, health and well-being of communities and residents across the Doncaster Borough. Previously assumed inward investment, commercial growth, employment opportunities and reduced levels of deprivation and social exclusion have not materialised – nor is it likely to do during the coming years.

As such, the very basis on which the plan defends the scale of development and housing need is fundamentally inaccurate.

Once housing targets are amended to reflect a more evidence based potential for economic growth, additional changes will be required and will need to be included across the Plan eg: land supply currently identified for housing development within the Plan, may now show a surplus of housing land availability, potentially reducing or removing the ‘exceptional circumstances’ need to build on Greenbelt land and an avocation for retention, rather than removal.

For several years Doncaster has suffered from an oversupplied property market and a reducing volume of homebuyers in a financial position to purchase. Using aspirational rather than realistic need figures would perpetuate this trend.

**2. Intended Supply**

In questions 5.1, 5.2 and 5.3 the Inspector has noted that the intended housing supply for the Plan period 2015-2035 in Table 5 of the Plan consists of:
Net completions 2015 to 2018 3,400
Expected completions on allocations with planning permission at 2018 9,289
Expected completions on other commitments at 2018 not allocated in the Plan (small sites and in Defined Villages) 585
Expected completions on allocations without planning permission 6,630
**Total 2015 to 2035** 19,904

The Council’s responses to PQ26 and PQ27 identify further sources of supply during the Plan period:

Windfalls (200 per year 2018-2035) 3,400
Windfalls at Defined Villages 290
Windfalls on sites identified in the brownfield register 2019 197
**Total windfalls** 3,887

In total, the above would provide a supply of **23,791** dwellings between 2015 and 2035. This compares to the strategic aim set out in policy 3 of delivering 18,400 new homes in that period, a supply in excess of target of 29.3%

In addition, **2,292** new homes are expected to be built on a number of allocations after 2035 due to the intended building timetable for those particular large sites. There are no policies in the Plan that would prevent all these homes being completed before 2035.

Furthermore, “reserve sites” are identified in the Plan which have the potential capacity to accommodate another **1,438** new homes. Paragraph 4.82 of the Plan states that, due to HS2 and flood risk, there is doubt about whether they could be developed in the Plan period, and that for this reason they have not been factored into housing supply. As the government has promised significant funding for flood protection measures, and significant doubts are still being raised about the deliverability of HS2 even by Parliamentary committees, the sites of at least some of these homes could well become viable during the duration of the Plan.

If both of the above additional sources of supply come to fruition during the plan period, the total supply would increase to **27,521** or 49.6% in excess of the maximum stated target and this does not include the **1,200** additional homes which Policy 7 proposes should be built near Doncaster Sheffield Airport dependent on job growth at the Airport.

As Doncaster Sheffield Airport is one of the “transformational projects” which have been used to justify the aspirational upper target of **18,400** new dwellings, the 1,200 homes appear to be included in the target, yet excluded from the calculation of supply.
The additional 327 homes per annum is a target based on and to meet Planned Economic Growth through the delivery of new jobs.

Since the additional 1,200 homes at the Airport are also dependent on Economic Growth, we maintain there is no distinction and these should be included within the overall delivery target. As both are based on the creation of new employment.

In view of the above, the JRP believes that the answer to the Inspector’s question Q5.2 a, b & c “... does the Plan identify sufficient land to ensure that the strategic aim of delivering 18,400 new homes in the Plan period 2015 to 2035 can be achieved?” - is definitely yes.

The JRP believes that there is more likely to be a risk of oversupply, rather than undersupply. Doncaster seems likely to exceed a target which in itself is already overinflated. This would result in a “glut” of new homes, a dysfunctional housing market and a consequent increase in empty and neglected properties amongst the town’s older existing housing stock.

The JRP note that in the evidence-based draft ‘Homes and Settlement’ document, it states the current total of households for the Borough as 130,165 with the LP proposing an additional 18,400 new homes over the 20 years of the plan period. In all previous consultations we have raised concerns over the targeted increase, these concerns still remain since this still constitutes an increase of over +14% on the total available housing stock, in a Borough which has one of the worst performing housing markets in the UK.

3). Table 5 provides a figure of 6,630 for expected completions on allocations without planning permission. This includes 66 houses on former Greenbelt land at Plot 3 Harlington (Table H2K) and 80 houses on former Greenbelt land north of Cadeby Road Sprotbrough (Table H2P).

The JRP believes that, in view of the likely oversupply of identified sites, these developments do not meet the criteria for development and the purpose of removal from the Green belt. They should be removed from the plan and the land should be retained as Greenbelt – there are no exceptional circumstances to justify removing these sites from the Greenbelt.

There is a clear demonstratable over supply of housing land available. Consequently, it does not require or need Greenbelt land in order to achieve target delivery.

4). The JRP believes that the answer to the Inspector’s question Q5.3 a,b,c, & d - is yes - the plan should be modified to include the specified windfalls and homes at Doncaster Sheffield Airport since these and the 327 per annum are all based on the same assumption: on new employment creation and Economic Growth.

5). The JRP believes that the answer to the Inspector’s question Q5.4 - is yes – “Table 5 of the Plan and/or other parts of the reasoned justification for policy 6 should be modified to set out explicitly what the total housing supply is for the Plan period 2015 to 2035.”
6). The JRP notes that no mention of vacant housing stock has been made in identifying future housing supply.

As stated in previous consultation feedback, we believe a target should be set for bringing properties back into use as well as developing new housing stock.

As of October 2014, DMBC declared 4,281 houses as vacant and, judging by appearances, this figure has increased since then.

The National Policy Framework (paragraph 51) places an obligation on local authorities “to bring back into residential use empty houses and buildings and where appropriate acquire properties under compulsory purchase powers” and as such, we believe this should be included and considered within the Local Plan to ensure that a full utilisation of vacant or disused housing stock is seen as a priority.

Empty properties can blight the areas around them and act as a disincentive to developers to build new dwellings there. They also provide an opportunity to create new dwellings – often much needed affordable/starter homes - in existing, sustainable communities.

Bringing even 50% of this number back into use over the Plan period would deliver 2 to 3 years supply of new homes.

The Plan should include a target: the number of vacant houses to be brought back into use, ensuring the Council’s NPPF’s obligations are met.

In doing so, this reduces the need and justification to build the equivalent number of new houses.

Furthermore, it only compounds our strong argument that there are no ‘exceptional circumstances’ to justify taking land out of the Greenbelt when currently we have thousands of homes across the borough which could be brought back into residential use.

In our very strong opinion, the housing target cannot be considered sound if the new build housing target is not reduced accordingly to reflect this situation.

7). We welcome DMBC’s decision to clarify the meaning of “countryside” in Policy 2 Part 5 and throughout the Plan by substituting the phrase “Countryside Policy Area” to distinguish areas which are not in the Greenbelt from those which are.

This change clarifies that the statement in Policy 2 Part 5 that if a 5-year borough wide supply of housing land cannot be demonstrated residential development will be allowed if adjacent to a development limit in service towns and villages only if the town/village is not in the Greenbelt.

We agree that, in Question 5.12, the approach set out in Policy 2 Part 5 is justified, but we would like to re-iterate the caveat mentioned in our previous response that the wording in policies 5 and 26 should not be capable of being used to justify larger developments. For example, the change of use of existing agricultural buildings should not be allowed to be used to justify larger scale development.
The jobs growth figures which feed into the calculation of housing supply requirement also appear to be strongly influenced by optimism.

Sheffield City Region’s Strategic Economic Plan (SEP), which was agreed in 2014, seeks to create 70,000 new jobs across the City Region between 2015 and 2025. Subsequent work by the consultancy firm Ekosgen apportioned these 70,000 new jobs to each authority area. Doncaster’s share was 11,825 jobs, or 1,183 per annum.

This equates to a 10.7% increase, which is the joint second highest (with Sheffield) percentage increase in the region, with the regional average being 10%.

This is broadly in line with the actual increase in jobs in Doncaster between 1997 and 2015, which is shown in the Economic Forecasts and Housing Needs Assessment produced by Peter Brett Associates in 2018 as 21,000 (from 113,000 to 134,000) over the 18-year period, or 1167 per annum.

However, the SCR Statement of Common Ground states that jobs growth of 27,100 is actually being planned for between 2015-2032 by DMBC - 1,594 per annum, 34.7% more than the Ekosgen figure - although no specific target is planned for in the Local Plan.

In contrast, Sheffield have not increased their 25,550 jobs target for their Local Plan but have instead adopted the 10 year SCR target which they have chosen to deliver over a longer 17-year period (2015 – 2032), and Bolsover which had the largest increase in the Ekosgen study at 13.6% or 4,100 jobs - have now reduced its expectations, to 3,000 jobs.

Doncaster’s higher rate appears to be based on an aspirational “policy led” assumption of 1% per annum jobs growth for the whole of the period 2015-2032, even though the official government forecast for the period is 0.6% growth (Peter Brett Associates).

The Peter Brett study also states (Section 2) that, if the official government predictions for population growth in Doncaster are used, the labour supply in the borough will not grow fast enough to fill all the jobs created, and almost half of them would have to be taken by people moving to Doncaster from outside the SCR area.

The JRP believes that such optimistic forecasts are unlikely to be achievable in practice.

**Matter 6. Housing Development Requirements**

1). Housing Mix

Policy 8-part A requires developers to deliver a mix of house size, type, price and tenure to fulfil the needs and market demand identified in the latest Housing Need Assessment. The JRP believes that this requirement is justified (Question Q6.2), but believes that in certain categories more specific targets should be set (see below).

The JRP believes that the inclusion of Appendix 4 in the Plan is justified and consistent with the wording of policy 8 (Question Q6.3), but we wonder if the format of the table - which in some housing categories in some settlements nets off market rate dwellings against
affordable dwellings to produce a figure for the total requirement – may be confusing. For example, the total requirement for 1 or 2 bed houses in Bawtry is zero in column 1. This is made up 2 dwellings more than needed at market value (-2 in column 2) and requirement for 2 additional affordable dwellings (+2 in column 3). If no additional dwellings need to be built, by what mechanism will the surplus market rate houses be turned in to affordable houses?

2). Affordable Homes

Paragraph 6.9 of the Plan states that there is an identified need for an additional 209 affordable homes per year over and above the Council’s own build programmes. However, Doncaster MBC have calculated that the current requirements of policy 8-part b will only deliver around 3,461 affordable homes between 2015 and 2035 (173 per year). As this would produce a potential shortfall of 720 homes over the 20-year term of the plan. The current requirements of policy 8 do not appear to be fulfilled by the Council’s own evidence of need. In an economically depressed, low average wage area such as Doncaster now is an adequate supply of affordable housing is clearly of critical importance and the requirements of policy 8 appear to need strengthening, possibly by a small increase in the percentages of affordable housing on the largest sites where developer total profits would normally be highest.

The Housing Needs Survey 2015 states that affordable units with 2 bedrooms are in most demand (46%), followed by 3 bed (26%) and 1 bed (25%). This does not appear to be reflected in the figures in Appendix 4, as there are no separate figures for 1 and 2 bed houses or 2 and 3-bedroom flats. Even if both joint categories are counted as 2 bed, the actual mix does not reflect Needs Survey demand.

<table>
<thead>
<tr>
<th>1 bed flat</th>
<th>31</th>
<th>3 bed house</th>
<th>45</th>
<th>2 bed bungalow</th>
<th>19</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 bed bungalow</td>
<td>48</td>
<td>3+ bed bungalow</td>
<td>3</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total (40%)</strong></td>
<td><strong>79</strong></td>
<td><strong>Total (25%)</strong></td>
<td><strong>48</strong></td>
<td><strong>Total definitely 2 bed</strong></td>
<td><strong>19</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>1 or 2 bed house</strong></td>
<td><strong>15</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>2 or 3 bed flat</strong></td>
<td><strong>33</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>Total possibly 2 bed</strong></td>
<td><strong>67 (35%)</strong></td>
</tr>
</tbody>
</table>

3). Housing for Older People and People with Disabilities

The JRP believes that 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 is fully justified (question Q6.7).

However, it would be useful if specific requirements were set for the less financially attractive types of dwellings, such as bungalows, on large sites in a similar way to the percentage set for affordable homes.
We maintain, this need to address demand from changing demographics and population numbers expected is reflected in the Sustainability Appraisal. This states – “The overall population of people aged over 65 in Doncaster is 19% ... this expected to rise to 23.22% by 2030 ... and is greater than the national average 21.66%.’ While conversely, ‘... estimates suggest that the working age population (18-64) will decrease by 3% up to 2030’.

The requirements in Policy 46 parts B and C relating to accessible and adaptable dwellings [M4(2)] and wheelchair adaptable dwellings [ M4(3)] appear adequate to provide enough suitable housing to meet the predicted increase over the plan period in the number of households with over 65 year olds or people with long term health problems or disabilities. However, in relation to older people’s housing, there does not appear to be any mention of whether the accommodation should be in individual dwellings or in communities such as older people’s villages or blocks of flats specifically for older people.

Such “ready-made” communities may be the most suitable for some older people and there is currently very little provision of this type in Doncaster. There also does not appear to be any specific mention of measures to actually encourage or require the provision of supported living or extra care facilities.

4). Health and education facilities in association with housing developments

In our previous response we raised concerns that there was insufficient evidence within the Plan to ensure there is adequate provision of services for residents of new housing developments - specifically, the availability of school places, GPs and dentistry for the expected increase in population.

Under the updated plan we believe that, whilst the development requirements set out in policy 51 aimed at improving and promoting strong, vibrant and healthy communities are clearly justified they will not be effective because they are too general.

In particular, the meaning of the requirement in Part D for relevant development proposals to consider and assess healthcare infrastructure implications is very unclear. (question Q6.13).

As a minimum this needs to specify clearly what and how the developer is supposed to assess and, if the assessment reveals any inadequacies, what the developer is supposed to do about them.

The approach to the provision of education facilities in association with residential development set out in Policy 53-part B is relatively clear, but would be more likely to be effective if it were more specific, for example how large is a ‘significant’ housing proposal (question Q6.14)?
**Matter 7. Specific Types of Housing**

With reference to question Q7.1 the JRP agrees that the general approach to housing development in the countryside set out in policies 2, 3, and 26 is justified.

We accept that, in order to make communities sustainable, some appropriate development may be required in Service Villages and Larger Defined Villages situated in “Countryside Policy Areas”.

We agree that the size limits for an individual scheme/site and cumulative growth limits over the Plan period for residential development adjacent to Large Defined Villages situated in Countryside Policy Areas set out in policy 3 are justified.

However, in view of the apparent large oversupply of housing land in Doncaster as a whole (which we note under Matter 5) we do not believe that the allocation of what formerly was and still should be Green belt land for housing in Sprotbrough village and Barnburgh/Harlington is justified because the ‘exceptional circumstances’ necessary to permit these schemes, do not exist.

We feel that the Council’s suggested changes to the title of the first column of the table in policy 3 and footnote 5 relating to the site/scheme and cumulative growth limits for the 14 Defined Villages (to add the phrase Countryside Policy Area) is clearly necessary and would make the policy more effective by removing any possible confusion between villages which are in the Greenbelt and those which are not.

The requirement to demonstrate ‘exceptional circumstances’ and clear community support for development in the Countryside adjacent to the Development Limit of a Defined Village is, in our opinion, very well justified and very necessary.