M4. Green Belt

_Accommodating development in non Green Belt locations: windfalls_

SQ4.1. If 200 windfalls per year could be assumed to contribute towards supply during the Plan period, how many of those would be likely to be in the main urban area and each of the other six settlements where the Plan proposes to remove land from the Green Belt to allow housing development? Please express the estimate for each settlement as a total number of dwellings for the period 2018 to 2035.

1. The Council have set out in the response to matter 5.3 the reasons why it considers that windfalls should not contribute to the overall supply of housing in the Borough, and that they should be considered as an additional source of supply as well as a buffer to allocated housing sites. This remains the Council’s position.

2. The Council believes that attempting to predict where windfalls might come forward is difficult and that there is no “correct” way to do this. Below, we set out what we believe is the most suitable method for estimating this in order to answer the question, and based on information we have, however remain of the opinion that this is an unreliable exercise that should not be relied on to make assumptions about housing supply in the Borough.

3. To estimate possible future windfall supply in the seven areas where Green Belt allocations are made, we have calculated how many sites have been delivered on windfall sites (i.e. non UDP allocations) in each of the settlements in the last 4 years, and what share this is of the overall housing supply in those years. We have then calculated a 4 year average for each based on this information and applied this to the 3,400 potential windfalls between 2018 and 2035. The results are as follows:

<table>
<thead>
<tr>
<th>Settlement</th>
<th>2015 - 16</th>
<th>2016 - 17</th>
<th>2017 - 18</th>
<th>2018 - 19</th>
<th>Average</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>No. (1,025)</td>
<td>%</td>
<td>No. (1,049)</td>
<td>%</td>
<td>No. (1,137)</td>
</tr>
<tr>
<td>MUA</td>
<td>136</td>
<td>13.3%</td>
<td>261</td>
<td>24.9%</td>
<td>249</td>
</tr>
<tr>
<td>Conisbrough – Denaby</td>
<td>38</td>
<td>3.7%</td>
<td>14</td>
<td>1.3%</td>
<td>4</td>
</tr>
<tr>
<td>Settlement</td>
<td>2015-16</td>
<td>2016-17</td>
<td>2017-18</td>
<td>2018-19</td>
<td>Average</td>
</tr>
<tr>
<td>----------------------------</td>
<td>---------</td>
<td>---------</td>
<td>---------</td>
<td>---------</td>
<td>---------</td>
</tr>
<tr>
<td></td>
<td>No.</td>
<td>%</td>
<td>No.</td>
<td>%</td>
<td>No.</td>
</tr>
<tr>
<td></td>
<td>(/1,025)</td>
<td>(1,049)</td>
<td>(/1,137)</td>
<td>(/1,189)</td>
<td>(/1,100)</td>
</tr>
<tr>
<td>Barnburgh – Harlington</td>
<td>4</td>
<td>0.4%</td>
<td>0</td>
<td>0%</td>
<td>0</td>
</tr>
<tr>
<td>Bawtry</td>
<td>9</td>
<td>0.9%</td>
<td>6</td>
<td>0.6%</td>
<td>2</td>
</tr>
<tr>
<td>Carcroft - Skellow</td>
<td>22</td>
<td>2.1%</td>
<td>7</td>
<td>0.7%</td>
<td>0</td>
</tr>
<tr>
<td>Sprotbrough</td>
<td>9</td>
<td>0.9%</td>
<td>1</td>
<td>0.1%</td>
<td>0</td>
</tr>
<tr>
<td>Tickhill</td>
<td>6</td>
<td>0.6%</td>
<td>2</td>
<td>0.2%</td>
<td>0</td>
</tr>
</tbody>
</table>

Total Windfalls per settlement where Green Belt Allocations are proposed

4. As a share of the 3,400 potential windfalls between 2018 and 2035, this would be as follows:
5. In general, these findings back up the argument that in many locations there is a lack of alternative non-Green Belt land available to meet the housing requirements in a number of the Borough’s settlements.

6. Findings also show some anomalies which can impact on the overall figures and show why this exercise is unreliable. For example Bawtry delivered 39 windfall units (more than double the delivery in the other three years) in 2018–19 as a result of the development of a retirement living facility, which in this exercise significantly alters the average figure for the settlement. If the three years delivery 2015–18 are instead averaged out, it results in 0.5% of the total housing delivery across those years, which would equate to 17 dwellings as a share of 3,400 windfall dwellings 2018–35. Conisbrough and Carcroft – Skellow also show anomalous years in the above sample.

7. Therefore, whilst the Council believe that the method proposed is the best way to answer the inspectors question, we remain of the opinion that supply from windfalls should be additional to established housing supply, and that predicting where windfalls may occur is not something which can be accurately done to the point where it should be relied on to inform decisions about allocations at a settlement level.

Compensatory improvements to remaining Green Belt

| SQ4.7. | Could the provision of landscaping, open space and public rights of way on any of the housing allocations removed from the Green Belt be effective in securing compensatory improvements to the environmental quality and accessibility of remaining Green Belt land? |

8. NPPF paragraph 138 relates to compensatory improvements to remaining Green Belt, and so the Council considers on-site provisions to not adequately meet this requirement, as these improvements would relate to land no longer in the Green Belt. Furthermore, open space, landscaping and access to adjacent routes are normal parts of the design and development of sites and so this would not suitably address this additional requirement for Green Belt sites.

9. However, certain sites do provide clear opportunities to provide direct links/access from the site on to adjacent public rights of way or open spaces. These include:

- Site 115 – direct access could be made from the site on to the Balby Woodfield Mineral line (a disused railway line), which links to Potteric
Carr Nature reserve (in the Green Belt to the east of the site). The design section of the developer requirements asks that this opportunity is explored and the site promoters have included it as part of initial layouts.

- Site 1028 – direct access can be made to the Public Right of Way to the east of the site, which connects to a wider network of Public Rights of Way in the Green Belt to the south of Tickhill. Again the site promoters have previously included these links as parts of initial layouts.

10. In both cases, the proposed modification to the developer requirements set out in the response to the preliminary questions (2nd June 2020) will ensure that accessibility is considered as one part of the requirement to provide compensatory Green Belt improvements. However, the Council would be open to further strengthening this position in relation to these two sites within the developer requirements if the inspector deems this necessary for clarity.

11. It is noted that site 929 lies in close proximity to Boat Farm Quarry Local Wildlife Site (LWS) and supporting documentation to the Matter 4 statement for Lewis R & M (05023) promotes the fact that links could be made to nearby LWS. However access would be indirect and not on site as the inspectors question asks, as site 929 does not directly abut any LWS or defined walking route. Connecting to local Green Belt LWS may be something that could be considered as an offsite Green Belt improvement via the proposed modification to the developer requirements.

12. Overall, on sites 115 and 1028, there are opportunities to directly link the sites to adjacent walking routes in the Green Belt which could form a part of the compensatory Green Belt improvements related to these sites by improving the accessibility to the remaining Green Belt, as set out in NPPF paragraph 138.

**Exceptional circumstances for changes to the Green Belt: Rossington country park**

SQ4.9. Why is it necessary to include the proposed country park at Rossington in the Green Belt? Has its role in performing Green Belt purposes been assessed? Would its future role as a country park not be adequately safeguarded if it were designated as open space as is the case with Holme Carr Wood immediately to the east?

13. NPPF paragraph 133 states that “the essential characteristics of Green Belts are their openness and their permanence”; NPPF paragraph 139(f) requires plans to “define boundaries clearly using physical features that are readily recognisable and likely to be permanent.”
14. Since the Green Belt was originally defined in this location, the setting has changed considerably and will continue to do so over the new plan period.

15. The Rossington Colliery site itself is being redeveloped for housing (sites 662 and 247), and the associated colliery spoil has been used to form new development platforms on site, as well as alter topography on existing Green Belt land to the south of the former colliery to both reduce the height of the existing spoil mound on the former colliery site, and create a more naturalistic setting which will become part of the proposed country park.

16. What is currently the Green Belt boundary will no longer reflect the limits of the urban form in this area. The colliery spoil which lay to the north of the Green Belt boundary has been reduced and will be greened as part of the country park proposals, which extends and also naturalises land to the north of the current boundary which was formerly part of the colliery and not included in the Green Belt.

17. The Council have therefore taken the opportunity to reflect this change and redefine the Green Belt boundary here to what will be the southern extent of the housing on site 247. This will therefore create what will become a clearly defined boundary which better reflects the urban/rural (or open countryside) delineation ‘on the ground’. If left as it is, the proposed country park would be partially within and partially outside of the Green Belt, with the Green Belt boundary a restored bridleway which runs between the two.

18. Making this alteration therefore enhances the openness of the Green Belt in this location and reflects the changes that have happened on this site over the past twenty years to create a new boundary that will better reflect the updated situation here.

19. Secondly, in including this site within the Green Belt, the Council believe that the site can act as a form of compensatory improvement to overall Green Belt loss in the Borough. By bringing this land into the Green Belt, the benefits of the country park are secured for the Green Belt (making the Green Belt more accessible; environmental and biodiversity enhancements; recreational benefits; landscape and visual improvements; improving damaged land as per NPPF paragraph 141). This offsets the overall loss of Green Belt in the Borough and means that there is replacement Green Belt for the sites lost, which is also of better recreational value than the allocated Green Belt sites currently are. This position has been set out in The Green Belt Topic Paper¹ and the Council’s answer to the inspectors Preliminary Question 9.² ³

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¹ DMBC4 - Green Belt Topic Paper, section 7.6, pp. 145 - 148
² DMBC7 - Doncaster Council Response to Preliminary Questions, PQ9, pp. 12 - 14 - 2nd June 2020
³ DMBC9 - Appendix PQ8 - Exceptional Circumstances
20. The Council believe that this constitutes exceptional circumstances for amending the Green Belt in this case.

21. It is not the intention of this amendment that any extra obligations are made to the country park landowner in addition to those already agreed through the planning application for this site. Subsequent modifications to the plan ensure that development on the eight Green Belt allocations will also have to respectively provide local compensatory Green Belt improvements.

22. The site’s role in performing the Green Belts purposes set out in NPPF paragraph 134 has not been specifically assessed. In terms of whether the site would be adequately safeguarded as an open space, the Council considers that whilst this is an option, making this site Green Belt provides greater protection in addition to the aforementioned reasons for wishing to amend the Green Belt boundary here. It also ensures all and not half of the country park is within the Green Belt, as the country park proposals currently span both Green Belt and non-Green Belt land.

M5. Housing supply

Reserve housing sites

SQ5.3. Paragraph 4.82 refers to capacity on “reserve” sites for 1,438 dwellings, but goes on to make clear that they are not currently developable due to flood risk or the HS2 safeguarding route. They cannot therefore reasonably be regarded as reserve sites in the sense that they could be released if monitoring indicated a shortage of supply. So, would they not be better described as “potential development sites” or similar?

23. The Council agrees that it was not the intention of the reserve sites to be a source of supply that would be released if monitoring of the Plan indicated there was a need to release more land. The Inspector’s suggestion to relabel these as “potential development sites” is a better reflection therefore as to what these are i.e. an additional source of supply that could come forward if HS2 and/or flood risk constraints are overcome at some point during the plan period. Such has been the case with reserve site reference 398 (Owston Road, Carcroft) where the southern ‘half’ of the site (1.9ha) has had planning permission approved (subject to S106) in December 2019 (Reference: 19/01514/OUTM) having satisfactorily managed to overcome the flood risk constraint in consultation and agreement with the Environment Agency.

Five year housing land supply

SQ5Q5.7. Your statement seems to indicated that the 3,685 dwellings on sites with planning permission in categories A and B on 1 April 2019 also includes sites
with outline planning permission for 10 or more dwellings. But category C includes 1,183 dwellings on sites with outline planning permission for 10 or more dwellings. Please clarify.

24. The Council’s Hearing Statement at paragraph 28 states “Please note, the Council’s 5-Year Housing Land Supply Statement does not separate out the Outline permissions 10+ units (category ‘c’ in the Matters & Issues Questions) in Appendix A.” As drafted, it could be inferred that the sites in Appendix A includes category ‘c’ sites (Outlines for 10+ dwellings) so would be double counting. The Council’s Statement could have been clearer and gone on to say that, because of this, the Council undertook an exercise to remove such sites as part of deriving at the 3,685 total for categories ‘a’ and ‘b’.

25. The Council ‘manually’ removed from Appendix A of the Statement the supply from the 8 Outline permissions on sites 10+ units (which amount to 1,314 dwellings before applying a lapse rate, or 1,183 after the 10% discounting). This aligns with the 8 sites quoted in the preamble to the Inspector’s MIQ5.7 for supply from category ‘c’ sites.

SQ5.9. NPPF 73 requires a supply of specific deliverable sites to be identified each year sufficient to provide a minimum of five years’ plus an appropriate buffer. What is the justification for including a windfall allowance in the five year supply, as by their very nature they are not specific sites?

26. The Council’s response to MIQ5.9 made reference to the consistent and reliable supply from windfall sites over an extensive period, including following the adoption of the UDP development plan in 1998 that made allocations to meet development needs at the time. In brief, between 1998 and 2018, windfalls have averaged 496 units per annum. The Council’s view is that it is justified to include a windfall allowance for the purposes of 5-year supply and for the period 2019-2024. Given the Borough has a vast number of settlements with the large and contiguous Doncaster Main Urban Area, 7 Main Towns, 10 Service Towns/Villages, and a further 40 Defined Villages, it is inevitable that windfalls will continue to provide a healthy source of housing supply for both the 5-year, and wider plan period. With the commitment through national policy to use land effectively and efficiently (e.g. Chapter 11) and policies in the Local Plan, such as Policy 11: Residential Policy Areas, there is a strong and positive policy basis to continue to support such proposals.

27. It is justified to include a windfall supply in the current 5-year supply. Full applications have continued to be granted on sites not specifically identified in the 5-year supply during the 2019/20 monitoring (year 1 of the period). Applications have continued to be determined during the first 2 quarters of 2020/21 (year 2) period, and will continue to be so until the Local Plan is adopted (and thereafter). These sites, in particular smaller sites with detailed permission, will result in completions in the 5-year period. To illustrate this point, the following table identifies just some of the specific sites (5+ net units) which were not known/identified when the

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5-year statement was drafted, but will provide windfall housing completions during the 5-year period. This is in line with the NPPF’s definition of ‘deliverable’ from Annex 2, and as per the HBF Stakeholder Groups agreed HELAA methodology with respect to average lead-in times and build out rates.

<table>
<thead>
<tr>
<th>Planning Application Reference</th>
<th>Site</th>
<th>Decision Date</th>
<th>Total Net Dwellings</th>
</tr>
</thead>
<tbody>
<tr>
<td>17/0121/FULM</td>
<td>Glebe House, Haynes Rd, Thorne</td>
<td>26.06.2019</td>
<td>57</td>
</tr>
<tr>
<td>17/02585/FULM</td>
<td>Manor Farm, Bamsley Rd, Marr</td>
<td>28.08.2019</td>
<td>12</td>
</tr>
<tr>
<td>18/01230/FULM</td>
<td>Land At Corner Of Repton Road/ Sandyfields View, Skellow</td>
<td>17.04.2019</td>
<td>9</td>
</tr>
<tr>
<td>18/02040/FULM</td>
<td>Land Side Of Central Garage, High Street, Carcroft</td>
<td>15.04.2019</td>
<td>14</td>
</tr>
<tr>
<td>18/02735/FULM</td>
<td>County Court, 74 Waterdale, Doncaster</td>
<td>20.03.2020</td>
<td>18</td>
</tr>
<tr>
<td>19/00274/FUL</td>
<td>Dockin Hill Car Park, Dockin Hill Road, Doncaster</td>
<td>10.10.2019</td>
<td>9</td>
</tr>
<tr>
<td>19/02564/FULM</td>
<td>The Old Billard Hall, Queens Crescent, Edlington</td>
<td>19.12.2019</td>
<td>16</td>
</tr>
<tr>
<td>17/01254/FULM</td>
<td>Land At Clifton Hill, Conisbrough</td>
<td>23.12.2019</td>
<td>9</td>
</tr>
<tr>
<td>19/01814/FUL</td>
<td>Old Anchor Inn, Fishlake Nab, Fishlake</td>
<td>07.02.2020</td>
<td>7</td>
</tr>
<tr>
<td>19/01836/FUL</td>
<td>27 Waterdale Centre, Waterdale</td>
<td>10.09.2019</td>
<td>6</td>
</tr>
<tr>
<td>19/02764/FUL</td>
<td>1 Spring Gardens, Doncaster</td>
<td>06.01.2020</td>
<td>6</td>
</tr>
<tr>
<td>19/02865/FUL</td>
<td>157 Marshland Road, Moorends</td>
<td>20.03.2020</td>
<td>5</td>
</tr>
<tr>
<td>19/01894/FUL</td>
<td>The Harlequin, King Edward Road, Thorne</td>
<td>16.01.2020</td>
<td>5</td>
</tr>
<tr>
<td>19/03058/FULM</td>
<td>Land off Broadwater Drive/ Broadlands Close, Dunscoft</td>
<td>21.07.2020</td>
<td>41</td>
</tr>
<tr>
<td></td>
<td>(Approved subject to S106)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td></td>
<td></td>
<td><strong>214</strong></td>
</tr>
</tbody>
</table>

Table SQ5.9.1 - examples of windfall planning applications not identified in the 5 year statement

28. The above does not include any supply from small sites (1-4 units), which does of course contribute significantly to windfall supply by their very nature of being small infill plots and Changes of Use. Over 100 applications on sites 1-4 net units were granted in the 2019/20 monitoring year equating to over 160 dwellings. Although the supply does allow for some contribution from Prior approvals (for any sites that were under construction), again there has been further Prior approvals during the last monitoring year, particularly through office to residential schemes, which could not have been known at the time and would therefore be classed as windfall supply.

29. That said, the Council has revisited its assumptions for the windfall allowance for the 5-year period (2019-2024) and would like to suggest a slightly different approach is required compared to the current 200 dpa flat rate contribution across the period, or the 1,000 units in total, as follows:

<table>
<thead>
<tr>
<th></th>
<th>2019/20</th>
<th>2020/21</th>
<th>2021/22</th>
<th>2022/23</th>
<th>2023/24</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0</td>
<td>0</td>
<td>200</td>
<td>200</td>
<td>200</td>
<td>600</td>
</tr>
</tbody>
</table>

30. This would better reflect that completions in the year 1 and 2 period, albeit to a lesser extent in year 2, are likely to already be accounted for by the specific supply from permissioned small sites as at April 2019. After this 2-year period, the Council maintains the position that 200 dpa (and a reduced 5-year supply total of 600 dwellings from windfalls) is both justified and cautious when considered in the context of the above.

**M6. Housing development requirements**
Affordable housing

31. The Council’s Hearing Statement\(^5\) concludes that Policy 8 of the Local Plan will go a long way towards meeting affordable housing needs at the borough scale. This is based on a summary of affordable housing supply from commitments, and an anticipated supply from allocations in the Plan in line with their respective affordable housing viability area contribution. If the requirement for affordable housing provision on sites in lower value areas was reduced to a level that would indicate that some or all types of site would be viable, how would that affect the aim of meeting the need for affordable homes?

- such sites made up 4% of the supply (or 9 sites amounting to 653 dwellings);
- that 3 of these sites (141 units) had now progressed to Planning, including some now having consents in line with Core Strategy Policy 12;
- that 4 of the sites (253 units) are on Council owned sites (at Edlington, Conisbrough-Denaby, and, Rossington), and,
- the remaining 2 sites are a brownfield site at Askern and a Green Belt site at Conisbrough-Denaby.

32. Regardless of Policy 8 requirements, the Council as landowner could bring forward the 4 sites with a higher affordable housing contribution, whether the proposed 15% as per the requirements of Policy 8 part B or any lower level, also noting that some of these sites are in the Housing Revenue Account.

33. Should the requirement of 15% be reduced, then naturally the assumption around affordable housing from these sources will be less in terms of overall borough supply and the 209 dpa net need target. Generally, these low value areas are locations where the Housing Needs Study\(^6\) has identified there to be a surplus of affordable housing stock. For example, see Appendix 4 of the Local Plan (page 318 - Dwelling Mix and Type) which identifies a net surplus at 8 settlements in the top 3 tiers of the hierarchy, including Conisbrough-Denaby, Edlington, and Rossington.

34. It should be mindful though that if the affordable housing provision was reduced, to say 10% in the low value areas (in line with the minimum requirement of the NPPF), this would not actually change the viability outcomes. The “low cost developer urban extension greenfield” site typology would remain viable (as they already are with 15%), but the “low

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\(^5\) Council Hearing Statement Matter 6: Housing Development Requirements September 2020 paragraph 24 page 7

\(^6\) SDEB 24.1 & 24.2 Housing Needs Study 2019 paragraph 5.26-5.28 page 75
cost developer urban settlement brownfield” site typology would all stay
unviable (again as they already are with 15%).

SQ6.5. NPPF 64 requires 10% of dwellings on major sites to be available for
affordable home ownership. The tenure split proposed in paragraph 6.9 of the
Plan would not seem to achieve that. For example, in higher value areas a
development of 100 dwellings would need to provide 23 affordable homes, of
which only 6 would be for affordable home ownership (ie 6%). Is this departure
from national policy justified?

35. NPPF paragraph 64 states major developments should expect at least 10%
of the homes to be available for affordable home ownership (as part of the
overall affordable housing contribution) unless it would exceed the level of
affordable housing required in the area, or significantly prejudice the
ability to meet identified needs of specific groups. In order to consider an
appropriate affordable housing tenure split, the Housing Needs Study
considered national policy, past trends in delivery and the relative
affordability of alternative tenure options. The Study therefore is an up-to-
date and robust evidence base with respect to housing need for the
Borough of Doncaster over the next 5 years. The tenure split identified
(75% social/affordable rented and 25% intermediate tenure) would be
appropriate based on household preference, but 50% shared equity is
affordable to a majority of existing and newly forming households in need.
This is locally derived evidence on housing needs for Doncaster.

Housing for older people and people with disabilities

SQ6.9. The viability assessment included additional costs to meet the
requirements for accessible and adaptable dwellings [M4(2)] and wheelchair
adaptable dwellings [M4(3)]. Please respond to the claim that these costs are
understated as they assume an increase of 6% since 2014 (based on the retail
price index) whereas BCIS shows costs increased by 30% between 2014 and
2019.

36. The Whole Plan Viability Testing was principally based on schemes
delivering housing (and not apartments). This is discussed in paragraphs
5.3.4 to 5.3.6 of the Whole Plan Viability Testing7. In Table 8 of the same
the costs of M4(2) are set out, which date from Sep 2014 (from EC
Harris). For 2b housing this is £1,083, for 3b housing £1,081 and for 4b
housing £1,080. We adopted a cautious approach in our testing and
allowed £1,500 per dwelling (see para 5.15.24). If the 30% BCIS inflation
rate is applied the 2014 M4(2) cost estimates for housing this increase the
costs to: 2b housing £1,408, 3b housing £1,405 and 4b housing £1,404.
Within this context, the £1,500 per dwelling allowance as used in the
modelling is still considered to be cautious, even if the BCIS 30%
inflationary rate is applied.

7 SDEB48.1-48.3 Whole Plan Viability Testing paragraphs 5.3.4 - 5.3.6
37. Since submission of the MIQ’s the government has launched a consultation document setting out options as to how to improve the accessibility of new homes, which include making M4(2) mandatory, or as a percentage requirement like the Local Plan is proposing. The short document is of interest as it includes relevant background, indicates a possible future direction for Government policy and a recognition of the need for more adaptable homes. The Prime Minister has set out the government’s plans to develop a National Strategy for Disabled People. This aims to put fairness at the heart of the government’s work and involve making practical changes to policies which strengthen disabled people’s ability to participate fully in society. The consultation forms a part of this work. Within the document at p.14, the estimated additional cost per new dwelling is approximately £1,400 for units which would not already meet M4(2). Within this context, the £1,500 per dwelling allowance as used in the modelling is still considered to be cautious.

38. For M4(3) the modelling included an allowance of £12,500 per dwelling, plus a sensitivity test at £25,000 per dwelling (to reflect the 2 tiers of M4(3) accessibility standards).

39. For the lower tier, the EC Harris costings are equivalent to an average of £10,210 for housing. If the BCIS 30% inflation rate is applied this equates to £13,273 per dwelling. Whilst our allowance of £12,500 is slightly below this level we do not consider that this undermines the viability testing for 2 reasons:

   - Firstly, as shown above for the M4(2) costs, our allowance is higher than if the BCIS rate is applied, which offsets some of this differential; and,
   - Secondly, notwithstanding point 1 the M4 (3) standard has only been applied to 5% of the dwellings in the modelling (as per the minimum requirement of Policy 46). For the 50 dwelling typology this would be equivalent to 3 dwellings, which is equivalent to a cost differential of £2,319, in the 100 dwelling typology this would be equivalent to 5 dwellings and a cost differential of £3,865 and in the 400 dwelling typology this would be equivalent to 20 dwellings and a cost differential of £15,460. Where schemes are shown to be viable they comfortably produce a sufficient surplus to offset these minor cost differentials.

40. Likewise for the higher tier, the EC Harris costings are equivalent to an average of £22,694 for housing. If the BCIS 30% inflation rate is applied this equates to £29,502 per dwelling. Whilst our allowance of £25,000 is slightly below this level we do not consider that this undermines the viability testing for the same reasons as outlined above.

**M7. Specific types of housing**

*Houses in multiple occupation*

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8 Raising accessibility standards for new homes: A consultation paper
SQ7.3. Your statement did not seem to respond to question SQ7.3 part (a) ie will policy 10 allow the housing needs of all members of the community to be met, including students, young professionals and individuals on low incomes?

41. Yes. HMOs are part of the range of housing that exists, and will continue to be provided for, in the Borough. In its entirety this range of housing will meet the housing needs of all members of the community with new development supported by the Local Plan.

42. Policy 10 does not seek to prevent the development of HMO’s, rather it has been drafted as a supportive policy in response to specific local circumstances that the Borough faces in regards to this form of housing. HMOs are still a permissible and valid form of housing that remains accessible to the groups highlighted should they wish to access it. However Policy 10 seeks to ensure that HMOs provide both adequate living conditions and do not result in undue impact to the neighbourhoods and the communities in the places they come forward.

43. Doncaster does not have a university and consequentially a significant student population. Students from Doncaster are likely to move away to their university or remain living at home in Doncaster and commute. The Housing Needs Study estimates that just 0.4% of the Borough’s private rental sector is student households (approx. 85 dwellings). Should students wish to live in Doncaster HMOs will continue to be an accessible form of housing supported by Policy 10.

44. With regards to young professionals, it should be noted that the private rental sector in Doncaster overall is relatively affordable. The Housing Needs Study finds that median and lower quartile private rental prices in Doncaster are below regional and national levels and median prices have not fluctuated much since 2010. Lower quartile prices have actually decreased since 2010 which shows an excess supply of private rentals available. Young professionals living in Doncaster are therefore less reliant on HMOs as an affordable housing form than they may be if they resided in larger cities where non HMO private rentable accommodation is more expensive. Consequently they have a wider choice of affordable housing options available to them in Doncaster than just communal living.

45. For people on low incomes, in addition to HMOs, private and social rentals are available in the Borough which again lessens the likelihood that HMOs are the only viable and affordable form of housing to this particular group. The Local Plan, through Policy 8, will support the development of

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9 SDEB24.1 Doncaster Housing Needs Survey, April 2019, page 55, paragraph 4.21
10 SDEB24.1 Doncaster Housing Needs Survey, April 2019, page 55, paragraph 4.23
11 Ibid.
affordable housing in addition to HMOs being supported subject to the caveats of Policy 10.

46. The Council is justified in its approach to HMOs, given existing issues that the proliferation of these has had on communities and neighbourhoods in the Borough, and local experiences of poor management and the impact of this on the quality of living of vulnerable people who sometimes rely on this form of housing. The policy is positive in that it both supports the development of HMOs and also requires them to conform to improved and higher standards. Better standards improve the overall quality of living of HMO residents and reduces impact on surrounding communities and local services.

47. As previously stated, unlike other parts of the country HMOs are not the only available form of affordable private rental accommodation in Doncaster. A range of affordable alternatives are available in addition to HMOs for groups such as those specified. However, Policy 10 does allow for the needs of these groups to be met in properly planned and managed housing.