Doncaster Local Plan Examination
Matter 7 Statement – Specific Types of Housing

Issued  September 2020

1.1 This Hearing Statement has been prepared on behalf of our client (Swan Homes Ltd) (ID 05291). Our client seeks to respond to Question 7.1 only.

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

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

1.2 No. It is not clear how the size limit figures are derived. Furthermore, this is a restrictive approach effectively putting a ceiling on housing delivery in these Villages for the next 15 years; an approach not supported by the NPPF which seeks to boost significantly the supply of housing.

1.3 Indeed the NPPF clearly supports development in rural areas too, with paragraph 77 and 78 setting out that:

“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”

1.4 Furthermore, the Plan makes clear that the local housing needs of these Defined Villages “have been reallocated to the Main Urban Area and Main Towns, there is no requirement to allocate land at these locations” (footnote 5, page 31, DLP). It is clearly not a sound approach to seek to meet the identified needs of a Village elsewhere; the need should be met where it arises. This approach would unfairly and unsustainably impact on social networks in rural areas and prevents the benefits of new housing development from being delivered where they are most needed.

1.5 The plan should be positively prepared to provide enough development opportunities to meet its development needs in appropriate locations and a buffer to ensure choice and competition in the market and to account for appropriate flexibility and change.

Are 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 necessary and would they make the policy effective?

1.6 The proposed changes would not make the policy effective as they do not resolve the issues identified in answer to the above question.
Is the requirement to demonstrate exceptional circumstances and clear community support for development in the Countryside adjacent to the Development Limit of a Defined Village justified and consistent with national policy?

1.7 The requirement set out in Policy 2 and the supporting text of Policy 3, that residential development may only be supported in the Countryside on land adjacent to the development limits of a Defined Village when exceptional circumstances and clear local community support is demonstrated, is not consistent with the NPPF and therefore is not sound.

1.8 The requirement to demonstrate exceptional circumstances for otherwise sustainable development in the Countryside is wholly at odds with the NPPF and it is clear that this is a policy strategy of constraining development rather than directing sustainable development to meet need. The Countryside designation is misleading and implies a stronger degree of protection than is appropriate. The use of the term ‘exceptional circumstance’ indicates an alignment with the NPPF policy on Green Belt (albeit for planning applications it would be ‘very special circumstances’) which is not justified or required.

1.9 Whilst the NPPF identifies the need to recognise the intrinsic character and beauty of the countryside as part of the pursuit of sustainable development (NPPF paragraph 170b), it does not direct that all countryside should be protected from development for its own sake.

1.10 The recent delivery rates in Doncaster (as identified under our Matter 2 Statement) show market demand and demonstrates an imperative need for flexibility, which Policies 2, 3 and 26 currently do not afford.

1.11 With regard to demonstrating clear local community support, this policy wording is not precise and is ambiguous as to how this will be assessed in the determination of a planning application. If a proposed development is acceptable in all other respects it is not reasonable to also require community support. This is not required by the NPPF and there is no justification in the Plan for why this is a requirement for development in smaller settlements but not larger ones.

1.12 Is the Council’s suggested change to the end of part 3 of policy 26 (to clarify that other proposals for new dwellings in the Countryside will be supported in line with national policy) necessary to make the Plan sound?

1.13 Regardless of the Council’s suggested change to the end of part 3 of Policy 26, Part 3 of Policy 26 should be amended to make clear the policy text relates to Exception Sites and Isolated Homes in the Countryside and not all new homes in the Countryside. As currently drafted the policy is not sound as it has not been positively prepared nor consistent with the NPPF and without the aforementioned clarification remains in tension with Policy 2.

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