Matter 6  Housing Development Requirements.

Submissions on behalf of

Mr G Turnbull
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We act for Mr W Turnbull of Skellow Grange, who is part landowner of the following sites

- Site ref 164/130 Warning Tongue Lane Doncaster
- Site ref 165/186 Skellow/ Carcroft

We are instructed to attend the examination on his behalf and to comment on the issues that affect the development of these sites and associated matters, that have been set out in our original submissions to the Doncaster Local Plan.

Our client supports the allocation of both of the above sites and wishes us to contribute at the examination to assist in finding the plan sound with relevant modifications.

We have addressed the relevant questions in this Matter 6 and set out our comments below.

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

Site 164/430 Warning Tongue Lane

The site development requirements relate to archaeology, bio diversity, design education flood risk, open space transport and trees. It should be clear what the purpose of the site development guidelines is; presumably to inform planning applications.
This section of the Plan should include the site size in hectares and the number of homes anticipated and set out that this is a minima number.

The inclusion of a clear site area and the number of homes anticipated will make the proposal clear to all users of the plan.

In terms of clarity there is no explanation of the extent of an education contribution and where this is to be spent and how it is to be calculated.

The amount of open space required should be set out in the requirements to assist the preparation of applications and what is required in the open space areas.

The required provisions from other policies such as affordable housing should also be included in the guidelines

**Site 165/186 Skellow/Carcroft**

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The required provisions from other policies such as affordable housing should also be included in the guidelines.

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

The provision of affordable homes it set out in Policy 8b and the areas where the various levels of affordable units required is shown in Appendix 5 and this deals with the tenure mix. The policy is unclear about circumstances where an offsite commuted sum is justified how this is to be calculated and reference should be made any document that sets out the approach. The Housing Needs Assessment document SDEB24-1 of 2019 is a general guide to the mix that will be required over the plan period and can only generally inform applications being prepared. The usefulness of the document will depend on how often it is updated to keep up with economic and social changes driving housing demand.
Q6.3. Is the inclusion of Appendix 4 in the Plan justified and consistent with the wording of policy 8? Will it be effective in helping to ensure that the need for different types of homes in different parts of the Borough are met throughout the Plan period?

The table as drafted is a broad annual snapshot of the need for various types of dwelling, for the 950 dwellings per year. It does not offer much assistance in to the industry in consideration of the mix on a site which is for a development to meet the needs over the rest of the plan period. The conclusion analysis in the SDEB24-1 Housing Needs Document 2019 is more helpful in the description of the generality of the accommodation going forward being three and four plus bedroom houses and bungalows. [para 8.4] It is not clear how often the Housing Needs Document will be updated to provide up to date information and on that basis we do not think Appendix 4 adds to the effectiveness of the Plan.

6.4. Are the requirements of policy 8 part B for housing sites of 15 or more homes (or 0.5 hectares or above) to normally include 23% affordable homes in high value housing market areas or 15% elsewhere justified by adequate, proportionate and up to date evidence about need and viability?

The Council have set out the need for affordable housing to deliver 209 affordable homes per year. Policy 8 is anticipated to deliver 173 homes per year based on the requirements in the two policy areas. In terms of viability the Viability Appraisal SDEb48.1 has factored in the affordable housing requirement based on the percentages. Whilst this shows that sites are viable in medium value housing areas, the viability margins are sometimes relatively small and where circumstances change and full site development costs become known then application viability will become necessary. The viability appraisal sets out three housing value zones rather than the two in Policy 8 and arguably a more refined approach to affordable homes based on the three value areas would be justified.
Q6.5. Is the reference in paragraph 6.9 to 75% of the affordable homes being for rent and 25% for low cost home ownership justified? Is it consistent with the national policy expectation that 10% of homes on major sites should be available for affordable home ownership? If the 75%/25% split is justified and consistent with national policy, should it be referred to in policy 8 rather than the reasoned justification?

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

a) The approach to “standardised or off the shelf” designs in policy 42 part B.
b) The requirement in policy 43 for all major developments to make use of pre application engagement with the Council, Design Review and urban design tools including masterplans, design guides, and design codes.

It is not clear from Policy 43 what is required from the site promotor/applicant. If the Council are asking that Masterplans should accompany these applications then that should be specifically set out and included in the design guidance for each site. Applicants should not have to wait for the Council to prepare supplementary design guidance for individual sites before submitting applications. This will simply hold up the progress of site delivery. The Policy needs to be clear and specific about what is required for applications on the Major sites.

c) The requirement in policy 45 part D for all major developments to utilise Building for Life throughout the design process.
d) The requirement in policy 42 part D for the provision of public art in all major urban extensions and high profile and prominent developments, particularly in the key priority areas listed and shown on the Policies Map.
e) The requirements in policy 44 part C relating to all edge of settlement developments.

Developments on the settlement edge are required to pay attention to the new urban countryside interface that will be created, this is a reasonable requirement. However the way that all of these design style policies are drafted are somewhat clumsy.

If masterplans are to be required for the major sites issues relating to the edge of settlement and design and layout matters can be included in the masterplan requirement in a single policy.
Q6.12. Are the requirements in policies 27, 29 and 49 relating to the provision of green infrastructure and open space and the landscaping of housing developments justified and would they be effective? In particular:

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

A green infrastructure masterplan should be part of a masterplan for a development site, there is no need for a separate green masterplan. The cut off level for production of a masterplan is currently set too low at 30 dwellings or as proposed on all sites of 1 hectare or more.

It is suggested that the policies are brought together for a general requirement for a masterplan for major sites of around 100 dwellings. It would be reasonable for the Council to indicate as part of the site development guidelines which sites need masterplans and a single policy can indicate what masterplans should include and when they need to be produced in the development process.

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

The policy as drafted reads that the policy will make up for existing deficiencies in green space. This is clearly contrary to the CIL regs and what sites should be asked to deliver. Sites need to plan for their own needs and any policy should be clear about what these policy requirements actually are. The proposed modification in PQ41 deletes the words about an existing deficiency but should be headed Development Proposals.

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

There is no justification for going for the higher figure and deleting the 10%

If there is to be a fixed figure it should be 10%.

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

Any payment for an offsite contribution should reflect what is needed /generated by the development proposed and not be related to the development values of the site.

This is loading sites with ever more costs which will diminish viability and prevent sites from coming forward in some areas where viability is marginal.

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

The same comment above applies.

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

g) The requirement in policy 49 part C for generous tree, shrub and hedgerow planting and the reference in paragraph 12.38 to a minimum of one tree per dwelling.
Q6.13. Are the development requirements set out in policy 51 aimed at improving and promoting strong, vibrant and healthy communities justified and will they be effective? In particular, is the meaning of the requirement in part D for relevant development proposals to consider and assess healthcare infrastructure implications clear?

The Policy is over prescriptive and is not justified. The Policy is unclear about how a future development will assess any healthcare infrastructure improvements. This is normally part of the planning application process and the consultations response of the Health Authority sets out if there are healthcare infrastructure issues. If there are major infrastructure issues then these should be flagged up in the development plan so they are clear and can be included in the overall plan viability testing in the same way as education infrastructure requirements.

Q6.14. Is the approach to the provision of education facilities in association with residential development set out in policy 53 part B clear, such that it will be effective?

The Policy as drafted is not clear as to what scale of housing will trigger mitigation for school places and what scale of development will require on site provision, although the explanation says it is developments of over 20 dwellings. If this is the threshold it should be in the Policy. The Policy does not say if affordable housing is included or if these homes are exclude from the requirement. The Policy should set out how these contributions will be calculated and refer to a detailed document that explains the sums required and the calculations, to work out any contributions.