Examination of the Doncaster Local Plan

Council Hearing Statement

Matter 2.
Quantity of Development Needed in the Borough

September 2020
Employment land

Q2.1. Is the strategic aim in policy 3 to facilitate the delivery of at least 481 hectares of land for business (B1), general industry (B2) and storage and distribution (B8) uses over the plan period (2015 to 2035) justified and positively prepared?

1. The delivery of at least 481 ha for employment land is justified and positively prepared. Doncaster is in the top 20% most deprived local authorities in England so it is necessary that the Local Plan assists in creating a strong and diverse economy.

2. The Economic Forecasts and Housing Needs Assessment\(^1\) was used as a starting point to calculate an employment land figure for each B type use i.e. Offices (B1a); Business and Manufacturing (B1 b/c and B2); non-strategic warehousing (B8); and Strategic Warehousing (B8) based on forecast job numbers\(^2\).

3. Two scenarios were considered in the Assessment\(^3\):
   
   (i) A Standard Baseline Forecast based on jobs growth of 0.6% per annum resulting in a land requirement of 28 ha.
   (ii) A Policy Led Scenario based on jobs growth of 1.0% per annum resulting in a land requirement of 193 Ha.

4. It is recognised in the Assessment that consideration should be given to additional factors to allow for (i) other uses, (ii) churn or frictional vacancy, (iii) competition and choice.

5. The Baseline forecast was considered to be too low to continue to deliver much needed economic growth. It also failed to take existing extant planning permission into account. Instead the policy-led scenario which assumes a job growth of 1% per annum (based on Sheffield City Region (SCR) aspirations) was used. The Council feel it is important to retain an ambitious growth target and there is sufficient evidence of investment and land development that 1% jobs growth can be achieved.

6. The forecast job figures from the Assessment were then translated into a land requirement using a local methodology (including the additional factors as listed above). The resulting calculated requirement is 409 ha. The requirement follows on from the significant economic growth in Doncaster of the previous 15 years and is in line with SCR growth aspirations.

7. The 409 ha figure was for the period 2015 – 2032 and due to the Local Plan period being extended to 2035, the land requirement was adjusted accordingly pro rata to 481 ha\(^4\).

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\(^{1}\) SDEB44 Economic Forecasts and Housing Needs Assessment (2018)

\(^{2}\) It is recognised that Use Class B1 has now been subsumed in to new Use Class E as of 1st September 2020

\(^{3}\) SDEB44 Economic Forecasts and Housing Needs Assessment (2018), paragraph 0.5 page 1

\(^{4}\) SDEB8 Employment Land Needs Assessment (2018), paragraph 6.25, page 52
8. Although the Council considers that 193 ha was a reasonable alternative, 481 ha is a more ambitious and credible land requirement which will help to achieve growth and deliver opportunities across the Borough. The strategic aim to facilitate the delivery of at least 481 ha is justified and positively prepared.

9. The Local Plan allocations demonstrate that the Borough’s objectively assessed employment need can be met during the plan period and indeed three of the allocated sites have additional capacity capable of providing more than anticipated during the plan period if the demand is there sooner than originally planned (as demonstrated in the Employment Land Supply Buffer Note\(^5\)). Doncaster is a separate functional economic market area and therefore the Local Plan proposes to meet the Borough’s job needs/land requirement to 2035. This was agreed and signed up to by all neighbouring authorities as well as the Mayoral Combined Authority. Again, this demonstrates that the strategic aim to facilitate the delivery of at least 481 ha is justified and positively prepared.

**Offices, retail, and leisure uses**

Q2.3. Is the Plan based on adequate and proportionate evidence about the quantitative and qualitative need for office, retail and leisure development in the Borough? To be effective, is it necessary for the Plan to be modified to state what those needs are?

**Office**

10. The evidence base for office forecasts is within the Economic Forecasts and Housing Needs Assessment\(^6\) and is finally concluded in the Employment Land Needs Assessment (ELNA)\(^7\). The ELNA calculates the land requirement for each B type use i.e. Offices (B1a); Business and Manufacturing (B1 b/c and B2); non-strategic warehousing (B8); and Strategic Warehousing (B8) based on forecast job numbers\(^8\). This results in an overall employment land requirement of 481 ha for the plan period which includes a calculated amount of 13 ha (gross site area) for office use and equates to 2.82% of the total amount\(^9\). This comparatively small office requirement reflects the market evidence from the Employment Land Review\(^10\) and the ELNA\(^11\) which state that office demand in Doncaster is low compared to other locations in the region including Sheffield and Leeds.

11. The table included as part of Policy 3 includes offices as part of the Employment category and also states that they will be co-located with other town centre uses. This is in line with the sequential approach set out in Policy 23 which follows government guidance set out in the NPPF. Only

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\(^{5}\) SDEB9 Employment Land Supply Buffer Note (2020), paragraph 2.8

\(^{6}\) SDEB44 Economic Forecasts and Housing Needs Assessment (2018)

\(^{7}\) SDEB8 Employment Land Needs Assessment (2020)

\(^{8}\) It is recognised that Use Class B1 has now been subsumed in to new Use Class E as of 1\(^{st}\) September 2020

\(^{9}\) SDEB8 Section 6, pages 44-52

\(^{10}\) SDEB10 Employment Land Review (2018), sections 2.4 (page 12), 3 (pages 17-21), 6 (pages 38-40) and 7 (page 41 -48)

\(^{11}\) SDEB8 Employment Land Needs Assessment (2020), section 3, pages 28-37
in some instances will offices be appropriately located outside of centres. There are a number of sites where offices could be developed and by stating a need figure it may potentially disadvantage sites and if demand does increase the Plan allows for new development to take place.

**Retail and Leisure**

12. Retail and leisure is a rapidly changing sector and is closely governed by need and demand. There are, and continue to be, changes in national legislation and policy to permitted development rights which affect retail and leisure uses. Therefore, it is important that planning can quickly respond to that change\(^\text{12}\) and it is very complex to plan for an exact figure for how much is required over the plan period. Therefore putting a figure in the Local Plan could be misleading and subject to immediate change. Instead there are a number of sites included in the Plan which go above and beyond the policy approach in Chapter 8: Retail and Town centres. These sites are listed in Policies 68, 69, and also 70 and will help to regenerate the borough, in particularly the Main Urban Area. There is also the potential for retail and associated uses at Doncaster Sheffield Airport as part of the housing-led mixed use urban extension.

13. The Retail, Leisure and Town Centre Study (2015)\(^\text{13}\) was undertaken by GVA using a variety of methods to assess the need for the borough up to the year 2032. This included looking at: a performance analysis of Doncaster, Mexborough and Thorne town centres; current shopping patterns and habits (informed by household surveys); retail expenditure capacity; and key quantitative and qualitative retail needs\(^\text{14}\).

14. The Retail Study includes a proposed maximum requirement of 42,000 sq. m of new retail space to 2032 across the Borough, and concludes there is a need for new leisure facilities in Doncaster, Thorne and Mexborough town Centres\(^\text{15}\).

15. Also of importance to the evidence base is the Doncaster Urban Centre Masterplan\(^\text{16}\). This assessed key sites in the Doncaster Main Urban Area as to which uses are the most appropriate and will help to assist in regeneration. Almost 50% of all the potential retail floor space figure is within the Mixed Use areas as detailed in the Masterplan and translated into Local Plan Policy 69. The figures are an indicative capacity. Being allocated as Mixed Use areas they offer the flexibility to respond to changing needs and market requirements. If demand does increase, the Plan allows for new development to take place. The indicative capacity across sites included in the Doncaster Urban Centre Masterplan demonstrates there is sufficient headroom above the Retail Study need figure of 42,000 to meet additional need that could potentially be created by the Local Plan targeted 1% jobs growth and the increased population associated with that growth.

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\(^\text{12}\) OTH39 NPPF, paragraph 11a, page 6
\(^\text{13}\) SDEB40.1 Retail, Leisure and Town Centres Study (2015)
\(^\text{14}\) SDEB40.1 Retail, Leisure and Town Centres Study (2015)
\(^\text{15}\) SDEB40.1 Retail, Leisure and Town Centres Study (2015) pages v, vi, 96, 96, 98, 115, 116, 117
\(^\text{16}\) SDEB43 Doncaster Urban Centre Masterplan (2016)
16. Some of the committed leisure facilities are combined with retailing; some identified leisure facilities uses such as family dining, bars and restaurants are defined within Use Class A\textsuperscript{17}. These include Civic Cultural Quarter (in Doncaster Town Centre), and the Dome Leisure Park (Lakeside) where both include a range of bars and restaurants and multiplex cinemas which play an important role in meeting national guidance\textsuperscript{18}.

**Summary**

17. The Council considers that the evidence base for office, retail and leisure is adequate and proportionate. It supports Local Plan Policy 3 and Policy 69 but also takes into account relevant market signals. It reflects allocations in the Local Plan such as the Unity Regeneration Project where there will be an element of retail and commercial issues in a new local centre (Policy 70). The mixed use sites allocated on Policy 69 allow for flexibility for both meeting anticipated need\textsuperscript{19} and changing circumstances.

18. It is not considered necessary to state the office, retail and leisure needs in the Local Plan. National policy states that plans should be sufficiently flexible to adapt to rapid change allowing centres to also respond to rapid changes in the retail and leisure industries\textsuperscript{20}. The Local Plan should also promote healthy, inclusive and safe neighbourhoods through mixed use developments and strong neighbourhood centres which plan positively for community facilities such as local shops and leisure uses\textsuperscript{21}.

19. There are a number of sites where offices, retail and leisure could be developed and by stating a need figure in Policy it may potentially disadvantage some sites. If demand does increase the Plan allows for new development to take place.

20. The Council acknowledges in the Local Plan\textsuperscript{22} that situations and circumstances change and commits to regular monitoring to determine effectiveness. An Annual Monitoring Report will track development progress and help inform a Local Plan Review.

21. However, for clarity it is considered that an additional paragraph should be included in the explanatory text for Policy 3 which refers to the Retail, Leisure and Town Centre Study (2015). The modification to the explanatory text will be inserted between 4.50 and 4.51 (therefore creating a new paragraph 4.51) is:

\begin{verbatim}
4.50 Some centres are struggling........
\end{verbatim}

\begin{verbatim}
4.51 GVA were appointed in 2015 to prepare the Retail, Leisure and Town Centre Study and it is used to help inform the Local
\end{verbatim}

\textsuperscript{17} It is recognised that Use Class B1 has now been subsumed in to new Use Class E as of 1\textsuperscript{st} September 2020
\textsuperscript{18} OTH39 NPPF, paragraph 85, page 25
\textsuperscript{19} OTH39 NPPF, Paragraph 81 (b) page 23.
\textsuperscript{20} OTH39 NPPF paragraph 11, page 6 and paragraph 85, page 25
\textsuperscript{21} OTH39 NPPF paragraphs 91 & 92, page 27
\textsuperscript{22} CSD3 Doncaster Local Plan 2015-2035 Regulation 19 Publication Version, Monitoring, page 184
Plan. The Study undertakes town centre checks; looks at shopping patterns; examines retail capacity; and makes strategic recommendations on future needs for both convenience and comparison goods.

4.52 The Doncaster Urban Centre Masterplan

**Housing requirement for the Plan period 2015 to 2035**

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<tr>
<th>Q2.4</th>
<th>Does the Plan clearly establish a housing requirement figure for the Borough for the Plan period as required by national policy?</th>
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<tr>
<td>22.</td>
<td>Yes. The housing requirement for the plan period (2015-2035) is a range being: 11,700 (20 years x 585dpa) - 18,400 (20 years x 920dpa) dwellings. When delivery in the first three years of the plan period (3,400 net units between 2015 and 2018) is deducted, the residual net requirement for the years 2018-2035 is 8,300 - 15,000 dwellings (or 488dpa-882dpa). Table 5, which supports Policy 6 in the Plan (page 44), provides a summary of this in respect to the ‘top of the range’ figures. The Council’s response to Question 2.5 below justifies why the Plan’s Table 5 does not make numerical reference to the ‘bottom of the range’ figure.</td>
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<tr>
<th>Q2.5</th>
<th>Is expressing the housing requirement as a range consistent with national policy or otherwise justified? If so, what should the bottom of the range be (assuming that it must be a fixed figure)?</th>
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<tr>
<td>23.</td>
<td>Yes. As set out in the response to Question 2.4 above, the housing requirement is expressed as a range. At the point the Local Plan was being prepared the range was 585dpa–920dpa. The 585dpa ‘bottom of the range’ figure represented Local Housing Need (LHN) as calculated via the Government’s standard methodology at the point of assessment in early 2018. The 920dpa ‘top of the range’ figure includes the economic uplift (rounded up from the actual figure of 912dpa) as established in the Economic Forecasts and Housing Needs Assessment (SDEB44).</td>
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| 24.  | The bottom end of the range is expressed narratively (as opposed to an actual figure being specified) as it is the LHN figure as calculated through the Government’s standard methodology. This will be recalculated each year throughout the plan period. For this reason, the Council decided not to insert a figure into the policy given it would become out-of-date and could be confusing therefore. See response to Q2.6 below as to why the Council considers this is justified and not problematic. Given the current uncertain climate in respect to Covid-19, the Council believes this provides much needed flexibility to help deal with the inevitably uncertain times ahead, albeit in acceptance that an unprecedented global pandemic was not foreseen at the time the Plan was drafted. See also the Council’s response to Question 2.6b for further details of why the Council hopes that these uncertain times will be offset someway by an unprecedented economic response at all levels. |
25. A brief summary of how the Plan has derived its housing requirement range is set out in the Housing Topic Paper (DMBC4), in particular section 4.1, with greater detail in the respective evidence base, such as the Economic Forecasting and Housing Needs Assessment 2018.23

26. NPPF paragraphs 11 and 47 are clear that planning decisions should be taken following a plan-led approach. The Council could have just adopted the standard methodology figure as the Local Plan housing requirement in the first instance, but have resisted such an approach and instead are planning for a very significant uplift for our ambitions for growth; this is reflected in the scale of allocations proposed. That said, the vast majority of this ambition needs to be delivered by the development industry and the market. The Council has relatively little role to play post planning decisions being granted in terms of actual housing delivery. Losing control of 5YHLS in this context therefore undermines the key policy objective of having a plan-led approach rather than the presumption that would be applied if 5YHLS cannot be demonstrated.

27. The Council’s view is that the approach is consistent with national policy. The principle of identifying housing requirements as a range, with the LHN figure as the lower end of the range, is clearly supported in PPG in respect to both calculating 5-year supply24 and for calculating the Housing Delivery Test (HDT) result25. The Council’s view is that such an approach allows the Local Planning Authority to accord with the Government’s (and the Council’s) clear objective of delivering significant economic and other growth, whilst striking the important and appropriate balance between this aim and plan-led decision-making. The approach suggested by the Council achieves this important balance.

28. The Council’s intention is to set the bottom of the range narratively in the plan/policy itself. Although PPG26 is clear that the LHN figure may be relied upon for a period of 2 years after Submission, the insertion of the figure would date the plan very quickly which was considered as being unhelpful; hence the more narrative approach was taken forward. Further to this, the Council are fully aware that the figure/method to calculating LHN may change following further planning system reforms and that the current methodology may prove only to provide an interim solution27.

29. Variable figures are not inappropriate and are a common feature of the Planning system. Every Local Planning Authority works to variable and changing requirement figures (even where a singular ‘fixed’ requirement figure is adopted in the plan) through 5-YHLS Statements as well as the Government’s HDT Results for example. All provide the opportunity to report/calculate using the latest LHN figure at that point in time. Indeed, where local plans are more than 5 years old (and have not been reviewed), the housing requirement may well change on an annual basis.

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23 SDEB44 Economic Forecasting and Housing Needs Assessment 2018 - page 42
24 OTH41 ID: 68-027-20190722
25 OTH41 ID: 68-040-20190722 & OTH42 - paragraph 13
26 OTH41 ID: 2a-008-20190220
27 OTH59 Changes to the current planning system - Consultation on changes to planning policy and regulations (2020)
(see NPPF paragraph 73). Requirements are continually being adjusted to take account of matters such as: under-delivery; residual requirements; appropriate buffers etc., as well as how such should be addressed (e.g. Liverpool or Sedgefield method). Variables such as those noted normally result in an annually changing residual housing requirement throughout plan periods for all authorities. The Council does not consider that the approach it advocates for the Doncaster Local Plan introduces uncertainty nor does it undermine predictability. Indeed, the planning system regularly considers and responds to such variables.

30. NPPF paragraph 65 establishes that housing requirement figures should be met over the plan period and Policy 3 identifies the 18,400 upper end of the range plan period requirement with sufficient sites allocated (Policy 6) to ensure that this will be met. The Council’s approach affords us to make long-term strategic decisions in order to allocate sites sufficient to deliver the housing requirement by the end of the plan period (or in Doncaster’s case sooner than that by 2030/31 – see Housing Topic Paper28 for details – section 7.28 as well as the Council’s response to Matter 5 and Issue 5.10. Given there is now a statutory requirement for local plans to be reviewed at least once every 5 years, then the requirement to use the LHN figure for purposes of 5-YHLS (as per paragraph 73 of NPPF) where strategic policies for housing are more than 5 years old, will not occur. If it were to arise then the Council would be failing in its statutory duties.

31. By way of summary, the expectation from PPG29 is that housing requirement figures in adopted strategic policies should be used for calculating 5-YHLS where the plan was adopted in the last 5 years, or policies have been reviewed within this time and found not to need updating. The Council’s view is that expressing the housing requirement as a range has been justified and is appropriate; in fact in light of the newfound uncertainty post-Covid-19 is the exact sort of flexibility that NPPF calls for. As such, the range does constitute “the housing requirement figures in adopted strategic policies” as per the expectation of PPG. PPG30 then says that where a housing requirement is expressed as a range, one can use the lower figure for the purpose of calculating the 5 year housing land supply. There is no departure therefore from national policy.

Q2.6. Is the strategic aim in policy 3 to facilitate the delivery of 18,400 new homes in the period 2015 to 2035 (920 dwellings per year) justified and positively prepared? In particular:

a) Is it appropriate to plan for a higher figure than the standard method indicates (585 homes per year)?

32. Yes. NPPF paragraph 60 is clear that strategic policies should be informed by a local housing need assessment conducted using the standard methodology, but that alternative approaches may be justified that reflect

28 DMBC4 Topic Paper 4: Housing 2020
29 OTH41 ID: 68-005-20190722
30 OTH41 ID: 68-027-20190722
current and future demographic trends and market signals. PPG further clarifies this position and then goes on to state clearly that the standard methodology is a ‘minimum starting point’ before setting out some non-exhaustive examples of when it might be appropriate to plan for a higher housing need figure than the standard methodology. These include: where there is a growth strategy for the area; where there is investment in new infrastructure; and, where previous housing delivery is significantly greater than the figure derived by the standard methodology, or evidence from a recent SHMA suggests a significantly greater figure. The Council’s view is that these circumstances specifically referenced above are clearly present.

33. PPG is clear that the standard methodology does not attempt to predict changing economic circumstances and how this may impact on demographic behaviour. The Economic Forecasts and Housing Needs Assessment 2018, in particular paragraphs 2.20 – 2.31, is however clear that the forecasting has been heavily influenced by the ‘policy-led’ scenario as a result of their being a growth strategy for the area, i.e. the Sheffield City Region Strategic Economic Plan 2015-2025 and its assumed job growth of 1% per annum. For Doncaster, the ‘policy-led’ scenario showed an annual jobs growth of 1,564 jobs compared to the baseline forecast from Experian of 812 jobs per annum.

34. PPG is also clear that strategic infrastructure improvements that are likely to increase the number of homes needed locally is another reason to increase the housing requirement from the local housing need figure. The Council, working with its partners, are investing in significant planned new infrastructure schemes to continue to grow the borough as a location to attract and open up new inward investment, whilst improving the quality of life of our existing communities. Policy 13 of the Local Plan, and the Infrastructure Delivery Plan, provides a summary of some of the major road and transport infrastructure schemes. These include the new M18 Junction 5 link road (currently under construction) and further improvements to the extensive investment already seen to open up access the Airport and capitalising further on the recently opened Great Yorkshire Way (J3 of the M18). Such projects are helping to maximise the Borough’s already very competitive strategic location at the centre of the UK’s motorway network. Likewise, investment in social infrastructure, such as the Civic & Cultural Quarter development, is already providing a new leisure and cultural offer to the Borough and complimenting Doncaster Town Centres already extensive retail offer helping to make the Borough an even more attractive proposition for both the current population and people looking to move to Doncaster.

35. PPG also states that authorities will need to take into account previous levels of housing delivery in the area (or previous assessment of need

31 OTH41 ID: 2a-003-20190220
32 OTH41 ID: 2a-010-20190220
33 OTH41 ID: 2a-010-20190220
34 SDEB44 Economic Forecasts and Housing Needs Assessment (2018)
35 AE17 Sheffield City Region Strategic Economic Plan 2015-2025
36 SDEB28 Infrastructure Delivery Strategy Main Report 2020
such as a recently produced SHMA) and, where they result in significantly greater figures than the local housing need figure, this could be a factor to uplift to a larger housing requirement for the Plan. The Housing Topic Paper\textsuperscript{37} shows net completions for the Borough since 2004 to 2018. During this period, the Borough’s average net housing completion has been 658 dwellings. This is 73 net dwellings more than the local housing need figure of 585dpa and this includes the impact of very low completions following the 2008 recession where net completions fell to an all-time low in recent years of 141 units in 2009/10. The Housing Topic Paper\textsuperscript{38} provides further details in respect to this, in particular see section 7.2 on pages 71-76. Net completions during the first 3 years of the plan period (2015-2018) have far exceeded the local housing need figure of 585 averaging 1,133dpa. One of the first pieces of evidence the Council produced for the Local Plan was the 2015 Housing Needs Survey\textsuperscript{39} which was prepared in line with the then 2012 NPPF\textsuperscript{40}, and guidance on how to objectively assess housing need. This found an annual objectively assessed housing need figure for the Borough of 920dpa was appropriate. As set out above, the 2018 Economic Forecasting & Housing Needs Assessment\textsuperscript{41} also evidenced a much higher housing requirement of 912dpa (very much in line with the findings from the 2015 evidence) which, in line with PPG, are both figures significantly greater than the standard methodology’s starting point of 585dpa from two recently produced SHMAs, being the 2015 Housing Needs Survey\textsuperscript{42} and 2018 Economic Forecasting and Housing Needs Study\textsuperscript{43}.

36. In summary, setting a requirement which is higher than the standard methodology for Doncaster is seen as being positively prepared, being aspirational and ambitious, but still deliverable. The requirement will go a significant way to boosting housing supply for the Borough, whilst meeting the Borough’s housing needs, and is in line with paragraph 59 of the NPPF and justified through the evidence base, as summarised above and in line with the relevant PPG.

\textbf{b) Are the economic growth assumptions upon which the strategic aim of 18,400 new homes is based aspirational but deliverable between 2015 and 2035?}

37. Yes. As set out in response to question 2.6a above, the 18,400 new homes (920dpa) are based on an aspirational, but realistic, and therefore deliverable, economic growth assumption as set out in the Economic Forecasts and Housing Needs Assessment 2018\textsuperscript{44} evidence base, and Sheffield City Region Strategic Economic Plan’s 1% per annum jobs growth\textsuperscript{45}. There is a positive policy framework for economic growth arising from national policy, the Sheffield City Region Growth Plan and the

\begin{footnotesize}
\begin{itemize}
\item DMBC4 Topic Paper 4: Housing, section 7.2 page 71
\item DMBC4: Topic Paper 4: Housing 2020
\item SDEB23.1 Housing Needs Survey 2015
\item OTH20 NPPF 2012
\item SDEB44 Economic Forecasting and Housing Needs Assessment 2018
\item SDEB23.1 Housing Needs Survey 2015
\item SDEB44 Economic Forecasting and Housing Needs Assessment 2018
\item SDEB44 Economic Forecasting and Housing Needs Assessment 2018
\item SDEB44 Economic Forecasting and Housing Needs Assessment 2018
\item Please note, due to Covid-19, the Sheffield City Region SEP is now on hold with a revised focus on a SCR Recovery Plan for the next 12 months which will provide a bridge and foundations to the new SEP in due course with a focus on ‘building back better’
\end{itemize}
\end{footnotesize}
emerging Northern Powerhouse. Doncaster’s own Inclusive Growth Strategy 2018-2021 seeks to build a stronger and more diverse economy for example by:

- harnessing its connectivity assets, industry strengths (e.g. future mobility and engineering) and other growth opportunities (e.g. supporting services, low carbon industries and the foundational economy);
- transforming the education and skills system; and,
- delivering a portfolio of development projects to improve Doncaster as a place to live, work, visit and invest.

38. Evidence of land take up and jobs growth for the first 3 years of the plan period (2015 to 2018) shows that Doncaster is on target to meet the 1% jobs growth per annum. As per the conclusions in the Employment Land Needs Assessment 2020 (paragraph 7.2 page 53) a large amount of this growth has been in the warehousing/logistics sector and has helped boost the economy over the last few years. However, there is now a recognition at the regional and local level that there is a need to diversify the economic offer of the borough such as ensuring that high value jobs are created in areas such as engineering, digital and creative, and advanced materials. This will require other employment uses being provided in the borough so the right sites need to be delivered at the right time as stated in PPG.

39. It is still too soon to understand the full effects of the Covid-19 pandemic on the economy, however the initial economic shock to Doncaster’s economy (and the UK and global economy as whole) has resulted in significant job losses and business closures. National lockdown policy remains fluid given the volatility of the spread of the virus and the extent of the Government’s economic support policy remains unclear.

40. Given the number of national and local variables, a number of potential scenarios are being modelled by the Sheffield City Region Executive Team working with Experian for the economic recovery in Doncaster and the Sheffield City Region as a whole. For example, ‘V’ shaped (sharp reduction in output followed by a rapid rebound), ‘U’ (sharp drop in output, modest rebound which then gains momentum) and ‘W’ shaped (reflecting a second lockdown). This modelling work will include an assessment of potential impact on individual sectors over forthcoming years – to help target interventions.

It could be now be argued that the 1% economic growth per annum is now beyond reach. However, we still believe this ambition is realistic over the lifetime of the Plan given the unprecedented range and breadth of socio-economic interventions underway and in the pipeline, which the Council has summarised in Appendix 1.

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46 AE21 Doncaster Inclusive Growth Strategy 2018-2021
47 SDEB7 & SDEB7.1 Employment Land Availability & Summary 2018
48 SDEB8 Employment Land Needs Assessment 2020
41. Doncaster and the SCR do not underestimate the potential economic impact of the Covid-19 pandemic in the immediate term and longer term. However, the package of interventions now being put in place in response to it is unprecedented and should enable the 1% growth rate to still be delivered during the plan period.

**c) If such economic growth were to materialise, would it be likely to affect demographic behaviour to the extent that an additional 335 homes are needed every year between 2015 and 2035 (on top of the 585 per year that the standard method indicates are needed)?**

42. Yes. Modelling by Experian suggests that the Doncaster population (based on official forecasts) will not be enough to meet labour demand in the Jobs led (1% growth per annum) scenario. The calculation was based on aspirational (and realistic and expected) growth in certain industry sectors, and the corresponding increase in jobs that would result. Estimates for the proportion of those jobs that would be taken by: a) local labour force (based on trends in increases in economic activity rates); and, b) people from outside the borough (see para 2.37 on page 20).

43. For those from outside the Borough, commuting patterns were analysed to estimate what proportion would be taken by commuters, and what proportion would be taken by ‘movers’ – the latter of which would represent those households that need a new home. The calculation did make the assumption that economic activity rates would increase, and so a proportion of the jobs would be taken by local workforce; and also an assumption about commuting rates. This scenario also assumes the rest of the Sheffield City Region will receive additional migration to meet policy led demand. Activity and employment rates will be slightly higher because of a slightly younger population attributed to jobs led migration.

**d) Do previous levels of housing delivery in the Borough indicate a need for more than 585 homes per year?**

44. Yes. The Council has set out its position on this issue as part of the response to question 2.6a above, including reference to the Housing Topic Paper which provides further details in respect to this, in particular see section 7.2 on pages 71-76).

**e) Should the Plan aim to deliver more than 585 homes per year in order to help meet the need for affordable homes?**

45. The housing requirement in the plan has not been specifically uplifted for the purposes of helping to meet affordable housing need, and the evidence given in the Economic Forecasts and Housing Needs Assessment is clear about this. The report sets out how it derived the objectively assessed housing need figure and that the evidence has not assessed affordable need, or considered whether it would justify an uplift.

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49 SDEB44 Economic Forecasts and Housing Needs Assessment 2018
50 DMBC4 Topic Paper 4: Housing 2020
51 SDEB44 Economic Forecasts and Housing Needs Assessment 2018, paragraph 5.23 on page 46
if there were insufficient developer contributions from market housing to meet assessed needs.

46. The SA Report\textsuperscript{52} (in particular Appendix D of the 2020 Addendum Report) has considered a number of reasonable housing requirement figures as set out in the response to Hearing Statement 1 and Question 1.5. Objective 5 of the SA relates to providing affordable, good quality housing that is available to everyone, including vulnerable and disadvantaged groups. All of the housing requirement figures assessed were identified as having ‘significant positive effects’ against the objective, but also some ‘uncertain effects’ identified for option 4 (a higher housing requirement than proposed through the plan given uncertainty around whether the economic growth associated with the figure would be realised).

47. Setting a housing requirement ‘top of the range’ figure of 920dpa and for the purposes of allocations, compared to the standard methodology figure of 585dpa, by its very nature will of course help bring forward more affordable housing over the plan period and so go further towards meeting assessed need as identified through the Housing Needs Study 2019\textsuperscript{53}. Of course, further to this, the standard methodology itself (step 2) already makes an upwards adjustment to the average annual projected household growth figure to reflect affordability of the area (see step 2 of the PPG\textsuperscript{54}). The guidance is clear that household growth alone is insufficient as an indicator of future housing need and this step then ensures the methodology responds to price signals, significantly boosts the supply of new homes, whilst starting to address their affordability. Please see the Council’s response to Matter 6 and Questions 6.4 and 6.5 for further details on how the Local Plan is looking to meet, as far as possible, affordable housing need over the plan period.

\textsuperscript{52} CSD7 & CSD7.1 Sustainability Appraisal Addendum 2020 & Sustainability Appraisal Report 2019
\textsuperscript{53} SDEB24.1 & 24.2 Housing Needs Study & Appendix 2019
\textsuperscript{54} OTH41 ID: 2a-004-20190220
Appendix 1: Supporting Information to Question 2.6b

- Delivery of existing priorities (as outlined in the main body response to Q2.6b);
- Additional spatial targeting of our key growth areas, supported by a transformative capital investment programme which draws together external funding (e.g. Future High Streets Fund; Town fund; Transforming Cities Fund; SCR Devolution Pot; SCR Getting Building Fund ESIF) and DMBC capital budget or borrowing) – see the table below for a summary of the main ones.

| Doncaster Town Centre | • The delivery of the Urban Centre Masterplan continues with the objective of developing a modern, mixed-use centre which provides a stronger draw for business, innovation, residents, workers, visitors and inward investment.
  | • For example, construction work is well underway at the Civic and Cultural Quarter (new Museum and Library; new University Technical College; new cinema and restaurants) and the station forecourt (part of the City Gateway project);
  | • The Waterfront site is coming to the fore as a key part of the Urban Masterplan. It is one of the largest brownfield waterside sites in the UK covering over 100 acres and the Council owns a substantial proportion of the land. A range of options for developing the site are being explored and proposals are well advanced for:
  |   ▪ A new Hospital;
  |   ▪ Film Studios;
  |   ▪ A Northern Sustainability Centre; and,
  |   ▪ A student Campus as part of our University City ambition. |

| Doncaster Sheffield Airport and the Gateway East Growth Hub | • DSA is the key anchor within a wider 1,600 acre Gateway East growth site that is central to the economic plans of the SCR. The site is already home to over 100 businesses. The site has existing planning permission for 3.5 million sq. ft. of advanced manufacturing and logistics space, adding to previously consented 600,000 sq. ft. already under development;
  | • Gateway East is at the centre of a wider Future Mobility cluster (which includes iPort, rail engineering companies and NCATI). Plans to develop an Advanced Manufacturing and Logistics and innovation Centre (with campus) on the site form part of the wider ambitions for Sheffield’s Advanced Manufacturing Innovation District. A proposition for a Freeport is also well advanced to create further jobs and growth at scale;
  | • The SCR continues to argue for a new rail station for the growth hub which needs only 4.5 miles of
new track to connect it directly to the East Coast Main Line, Lincoln line and national freight network, offering local regional and national connectivity and the delivery of economic growth in a sustainable way.

<table>
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<th>Unity Project</th>
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| • This is one of the UK’s largest mixed use regeneration schemes with opportunities for commercial and industrial business, residential, retail and leisure developments. Work has started on a new Hatfield Link Road - a 2.9km stretch of new road from Junction 5 of the M18 to Waggons Way next to the former Hatfield Colliery to bring Project Unity to life.  
• In addition to providing up to 3,100 houses over the lifetime of the development, the project is expected to create up to 7,000 new jobs and attract upwards of £100 million in investment. |

- Agreement of the SCR Devolution Deal (July 2020) – which includes an additional £30m annual allocation over the next 30 years.
- Impact of existing Government C-19 economic support (e.g. the Job Retention Scheme).
- Submission of a £1.7 billion SCR Renewal Action Plan to the Government to help Doncaster and the SCR recover from the impact of the C-19 pandemic and ‘build-back better’ for the longer term. This ‘jobs-first’ Plan for the next 12 months is only the start of the SCR’s Recovery planning and includes:
  - A ‘South Yorkshire Works’ training and jobs guarantee for people, helping young people and workers secure jobs, apprenticeships and training – equipping them with the skills needed to find good work and help companies grow.
  - An investment and innovation fund for business – with the SCR Mayoral Combined Authority and LEP providing funding and specialist business support so more businesses survive, adapt and thrive.
  - An infrastructure stimulus in places across the region – revitalising and adapting town centres to Covid-19, upgrading transport links, funding projects that provide green growth and jobs (e.g. through retrofitting buildings), and helping business decarbonise.
  - This Plan has been submitted in the context of the Government’s ‘levelling up agenda’ and the need to invest, particularly in the north of the country in places such as Doncaster to start to address regional imbalances. The Renewal Plan will provide the bridge to longer-term SCR Strategic Economic Plan.

- Doncaster’s Restart, Recovery and Renewal Plan which includes 17 Actions including:
- Re-focusing our resources to support local jobs and skills that support people to gain new skills and employment.
- Continuing to support local businesses to operate who have been impacted by Covid-19
- Continuing to support and invest in our places and towns – by developing masterplans, infrastructure and capital projects that improve the borough economy and support skills and employment.
- Harnessing the opportunities presented by the transition towards achieving net zero carbon emissions to:
  - Unlock substantial business opportunities – to build a more resilient and better economy.
  - Create jobs and businesses at scale.
- Developing a more diverse and inclusive borough-wide learning community that helps shape a skills system for the future.