Doncaster Local Plan Examination
Hallam Land Management (ID 05212)

Matter 2 Statement – Quantity of development needed in the Borough

Issued: September 2020

1.1 This Hearing Statement is prepared on behalf of our client Hallam Land Management (ID 05212). Our client seeks to respond to Questions 2.4, 2.5 and 2.6 only.

M2. Quantity of development needed in the Borough

Q2.4 Does the Plan clearly establish a housing requirement figure for the Borough for the Plan period as required by national policy?

1.2 Policy 3 identifies the need to deliver 18,400 new homes in the period 2015 to 2035 (920 per annum), with sufficient land allocated to deliver 15 years’ supply of housing (13,230, or 882 dpa once supply in the years 2015 to 2018 is deducted from the overall requirement).

1.3 Policy 3 then goes on to state that the housing requirement is expressed as a range with the bottom of the range being the Local Housing Need figure and the top of the range being 920dpa. Policy 3 does however state what the Local Housing Need figure is. This is identified within the ‘Economic Forecasts and Housing Needs Assessment’ (June 2018) (prepared by PBA) [SDEB44] as 585 dpa based on the standard methodology as set out in the NPPF. The implication of this is that the housing requirement for Doncaster is a range of between 585 and 920dpa over the plan period.

1.4 The NPPF at paragraph 65 is clear that a single housing requirement figure should be identified:

“Strategic policy-making authorities should establish a housing requirement figure for their whole area.”

1.5 This is supported by the PPG which recognises (paragraph ID: 2a-010) that:

“Therefore there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan).”

1.6 Both the NPPF and the PPG are clear that a single housing requirement figure should be set out within a Local Plan. No robust argument has been provided by the Council to justify not using a single figure for the requirement.
Q2.5 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)?

1.7 Expressing the housing requirement as a range is not consistent with the requirements set out in the NPPF. The PPG at Paragraph 027 Reference ID: 68-027 clarifies that:

"Where strategic policy-makers have successfully argued through plan-making and examination for a requirement set out as a range, the 5-year land supply will be measured against the lower end of the range."

1.8 This suggests that at housing requirement expressed as a range is not the norm and needs to be strongly justified. The Council has not provided a robust justification.

1.9 Identifying the housing requirement as a range is not justified and will result in confusion in the future in respect of measuring delivery performance against the housing requirement identified in the Plan. The supporting evidence to the plan is clear that the aspiration in Doncaster is to support future growth based on the City-Region economic growth which requires 1,073dpa, 488 additional homes per annum above the standard methodology (which the Economic Forecasts and Housing Needs Assessment' (June 2018) [SDEB44] identifies as 585dpa) (depending on the period identified in respect to calculating the standard method) to support this and provide a range and choice of homes. Therefore, the inclusion of the standard method figure in the housing requirement range is out of alignment with the economic aspirations of the Plan. If a range is to be used (which we disagree with) this figure should be the bottom end.

Q2.6 Is the strategic aim in policy 3 to facilitate 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 indicated (585 homes per year)?

1.10 It is appropriate and justified to plan for a higher figure than the standard method. The NPPF is clear (paragraph 60) that the standard method provides the minimum number of homes needed in an area.

1.11 The PPG at paragraph ID:2a-010 is clear that the government remains committed to ensuring more homes are built and supports authorities who want to plan for additional growth and as such the standard method is a minimum starting point in determining the number of homes needed in an area. The PPG goes on to identify the circumstances where it may be appropriate to consider whether actual housing need is higher than the standard method. These include where;

- Growth strategies are in place such as Housing Deals;
- Strategic infrastructure improvements are identified; and
- Previous levels of housing delivery are significantly greater than the standard method.

1.12 The PPG is clear that in these situations authorities will need to take this into account when identifying the housing requirement identified in the Plan. For Doncaster the main drivers in identifying a housing requirement above the minimum level of housing set out by the standard methodology include the desire to support the wider City Region aspiration to increase the number of jobs and improve the life chances of local people. This is underpinned by the aspiration to achieve 1% of economic growth across the City Region. The 'Economic Forecasts
and Housing Needs Assessment’ [SDEB44] identifies that to do this, an additional 488 homes per annum (exact number varies depending on what 10 year period the standard method is based) will be required in addition to the minimum number of homes identified through the standard method which is 585dpa (as at the point of the Economic Forecasts and Housing Needs Assessment was undertaken).

1.13 Going above the minimum number of homes identified by the standard method also supports the approach recently outlined in the Government consultation ‘Changes to the Current Planning System’. The consultation is driven by the principal aim of ensuring sufficient land is released for new homes in the right places and that the overall level of housing need identified by the standard method is sufficient to ensure that land supply through the planning system is not a constraint in achieving local or national supply aspirations.

1.14 The consultation proposes a new approach to the standard method which for Doncaster would result in an annual level of need of 961dpa. This is broadly aligned (albeit higher) with the top of the housing requirement range identified in the Plan. The proposed changes to the standard methodology help to identify 337,000 new homes per annum required nationally, some way above the number of new homes identified through the existing standard method approach (270,000 homes per annum). Therefore identifying the 920dpa in Doncaster would demonstrate to the Government the Council’s commitment to the delivery of new homes and supporting the Government’s aim to deliver 300,000 homes per annum.

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