For and on behalf of
Mr RJ Ogley (03008)
Minerals Investments Ltd (Mr Ian Brealey) (03116)
Higgins Agriculture Ltd and Bellway Homes (03467)
South Yorkshire Housing Association (05214)

DONCASTER LOCAL PLAN EXAMINATION
STAGE 4 HEARING SESSION REPRESENTATION
MATTER 2 QUANTITY OF DEVELOPMENT NEEDED IN THE BOROUGH

Site Allocation Ref: 040 - Land off Sheffield Road, Conisbrough
HELAA Site Ref: 184 - Brodsworth Quarry, Green Lane, Doncaster
Site Ref: 189 - Higgins Site, Old Bawtry Road, Finningley
Site Ref: 446 – Mosham Road / land east of Hurst Lane, Auckley

Prepared by
DLP Planning Ltd
Sheffield

September 2020
Various Clients
Local Plan Hearing Statement – Stage 4 – Matter 2
September 2020

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1.0 INTRODUCTION

1.1 This representation has been prepared by DLP Planning Ltd on behalf of Mr RJ Ogley, Minerals Investments Ltd (Mr Ian Brealey), Higgins Agriculture Ltd* and Bellway Homes, and South Yorkshire Housing Association in response to the Stage 4 Examination Hearing Sessions of the Doncaster Local Plan.

1.2 This representation addresses Matter 2 in relation to the following sites:

- Site Allocation Ref: 040 - Land off Sheffield Road, Conisbrough
- HELAA Site Ref: 184 - Brodsworth Quarry, Green Lane, Doncaster
- Site Ref: 189 - Higgins Site, Old Bawtry Road, Finningley
- Site Ref: 446 – Mosham Road / land east of Hurst Lane, Auckley

1.3 This document should be read alongside previous representations on the publication version of the Plan, as submitted in September 2019.

*NB – The representor (03467) previously referred to as Higgins Agriculture Ltd is herein referred to as M Higgins Ltd.
2.0 RESPONSE TO INSPECTORS QUESTIONS

Matter 2 – Quantity of Development Needed in the Borough

Issue - 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?

2.1 No further comment.

Issue - 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?

2.2 No further comment.

Issue - Housing Requirement for the Plan Period 2015 to 2035

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

2.3 The Plan is being progressed under the 2019 NPPF. However, it is worthwhile considering the Government’s current direction of travel on these matters.

2.4 If the Council is seeking to support a plan led system then not only has the Plan got to be prepared in accordance with the current policy advice and guidance (PPG) but it must also be forward looking and ready to accommodate changes.

2.5 The NPPF (paragraph 11 a) specifically requires Plans to be sufficiently flexible to adapt to rapid change.

2.6 This is very clearly a time of rapid change and as such the strategy of this Plan needs to take on a wider perspective than one of simple adherence to past or indeed current guidance.

2.7 From the consultations being undertaken by the Government at the present time there is a clear indication as to their views of the seriousness of the shortcomings in the present system.

2.8 In the forward to the White Paper “Planning for the future” the Prime Minister sums up the failures of the present situation as follows:
"Thanks to our planning system, we have nowhere near enough homes in the right places. People cannot afford to move to where their talents can be matched with opportunity. Businesses cannot afford to grow and create jobs. The whole thing is beginning to crumble and the time has come to do what too many have for too long lacked the courage to do – tear it down and start again."

2.9 While the “Planning for the Future” paper sets out plans to undertake a fundamental reform of the planning system, the Government consider the situation to be so important that they are also proposing the shorter term measures in the “Changes to the current planning system”. Within this is the proposal to amend the Standard Method to be utilised prior to the more fundamental changes being enacted (paragraph 5).

2.10 Again it is clear from this consultation that the introduction of the Standard Method for calculating the future housing requirements (as in this Local Plan) has been reassessed and found, correctly, incompatible with achieving the Government’s stated policy of delivering 300,000 dpa.

2.11 This is a long standing objective as the Conservative Government elected in 2017 pledged to meet the 2015 commitment of delivering 1 million homes by the end of 2020, and the Autumn Budget 2017 set out an ambition to “to put England on track to deliver 300,000 new homes a year” with the aim of addressing these issues of affordability. The ambition of 300,000 a year is most recently restated in the consultation on the “Changes to the current planning system” (paragraph 6).

2.12 The context for these changes is the housing crisis, which consecutive Governments have failed to adequately address. Indicators of this crisis are widespread housing affordability issues facing Britain at present with more than three million households in the UK now spending more than a third of their household income on housing. The unresponsive nature of the planning system and failure of house building to keep up has led to a widening gap between supply and demand.

2.13 The consequences of this under-provision are well documented in terms of increased issues of affordability that have occurred over the last decade. In the period between 1997 and 2019 the affordability ratio increased on average in the UK from just 3.54 times annual income to 7.83 times annual income despite the impact of recent recessions.
2.14 Such housing affordability issues manifest in many ways, such as: increased levels of overcrowding, more young people living with parents for longer, impaired labour mobility meaning it is difficult for businesses to recruit and retain staff, and increased levels of homelessness.

2.15 Highlighting the problem with the current system, the consultation on the White Paper states that against the Government’s aspirations to create a system that will deliver 300,000 dpa, existing adopted Local Plans have only allocated enough land to provide for 187,000 homes a year, which is lower than the actual rate of delivery 241,000 (paragraph 6). Whilst not highlighted in the consultation, the difference between the two is in part due to the current discretionary nature of the planning system, i.e. the ability of decision makers to grant planning permissions for sites not allocated in adopted Local Plans. The consultation states that:

“However, identifying sufficient land so that the market is not prevented from delivering the homes that are needed is vitally important to prevent the under-delivery of the past from continuing to happen”

2.16 In the context of Doncaster, the new Standard Method would suggest a dwelling figure of 961 dpa. This is a 71.1% uplift compared to the current Standard Method of just 561 dpa and is higher than this emerging Local Plan which plans for a requirement of 882 dpa from the date of adoption. Whilst the emerging Plan is at Examination under the 2019 NPPF, the proposed transitional arrangements in “Planning for the future” (paragraph 2.50) would require a new Plan to be adopted within 42 months from the date the legislation is brought into place.

2.17 These ambitious changes highlight the urgency and importance the Government are placing on increasing the delivery of homes to react to the housing crisis.

2.18 More importantly, the Government has made it very clear that the Standard Method in the 2019 NPPF will not deliver their policy objective of 300,000 dpa.

2.19 It is important that this Plan positively contributes towards meeting this objective now (rather than by an early review). In doing so it is important to consider the context of the surrounding districts.

2.20 In terms of the implications for this Plan:
• Planning for a higher level of housing provision as suggested by the proposed Standard Method would be compliant with paragraphs 11 a), 15 and 16 b) of the NPPF.
• The Plan is already considering allocations that will deliver past the end of the Plan period and this should be undertaken in the context of the emerging changes to the current planning system so that the most sustainable long term option is selected. This will mean that the quick review that will be required under the transition arrangements will be more easily accomplished.
• The present strategy is not in accordance with the NPPF (paragraph 11 a) which specifically requires Plans to be sufficiently flexible to adapt to rapid change. The Plan at the very least should be based upon a strategy that can be expanded to accommodate a considerable increase in housing numbers.

2.21 The level of housing development to be delivered is set out in policy 3, which states that the Council will seek to facilitate the delivery of at least 920 (net) new homes each year over the Plan period 2015-2032 (15,640 homes in total) with sufficient land allocated to deliver at least 15 years’ supply (13,800).

2.22 Paragraph 60 of the NPPF states that the Standard Method establishes the minimum requirement for Local Plans and the PPG requires that this is calculated using the 2014 HHP (paragraph 005).

2.23 It is important to note that neither the NPPF nor the PPG require that Plans should only plan for the minimum housing requirement. As highlighted above, to do so would frustrate the Government’s aim of 300,000 dpa. The PPG (paragraph 10) suggests a number of scenarios where it would be appropriate to plan for a higher level of housing, and these include:

• Growth strategies for the area that are likely to be deliverable – it is clear that this Plan represents a continued growth strategy for the Council;
• Strategic infrastructure improvements (including highways and the airport) that are likely to drive an increase in the homes needed locally; and
• Previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced Strategic Housing Market Assessment), are significantly greater than the outcome from the standard method.
2.24 In the case of the latter, Authorities need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.

2.25 The SPRU report provided at Appendix 2 of DLP’s Reg 19 representation sets out the soundness of the proposed jobs-led housing requirement and the implications for the proposed spatial strategy.

Relationship between planned dwelling provision and economic growth

2.26 The Council’s Economic Forecasts and Housing Needs Assessment update (EFHNA) (June 2018) (SDEB44) accepts that the existing Strategic Economic Plan for the Sheffield City Region is out of date, with evidence dating back to 2013 (see paragraph 2.20). Paragraph 2.22 acknowledges a range of emerging targets and indicators to support growth in the Sheffield City Region as part of a review of the Strategy. These provide a longer-term vision for growth in the city-region as a whole to 2040. This represents an appropriate basis to consider the needs for economic development as part of a positively prepared Plan.

2.27 It should be noted that a number of individual projects and initiatives across the Sheffield City Region also reflect an appropriately long-term vision for the area, including those affecting Doncaster directly. For example, the Doncaster Sheffield Airport Masterplan indicates goals for growth in passenger and job numbers over a 2018-2037 period, with longer-term objectives to 2050. It is expected that the Masterplan for the airport will generate 73,000 net additional jobs.

2.28 It is within this context that paragraphs 4.29 and 4.30 of the EFHNA update (SDEB44) must be assessed in terms of the recommendations on an employment-led component of the housing requirement. Paragraph 4.29 states:

“In relation to the job-led scenario driven by SCR targets, we have already calculated the additional population needed to meet demand (para 2.40). To convert that population into housing, we have used the assumptions of SNHP 2014 regarding household formation rates and the size of the institutional (non-household) population. The resulting housing numbers are:

- For the plan period 2015-32, 1,073 dpa
- For 2016-26, the assessment period used in the new standard method, 912 dpa.”

2.29 Paragraph 4.30 of the EFHNA (SDEB44) indicates that the difference between the two figures is as much as 114dpa. The basis for that calculation is unclear, as the difference
between the two bullets is in fact 161 dwellings per annum. The decision to recommend a reduced requirement for the jobs-led component based on an artificially constrained period for the assessment (2016-2026) that conflates the approach to the standard method to assess housing need is not justified and is not consistent with national policy. This is likely to significantly restrict the ability to meet the forecast demand for employment growth over the Plan period.

**Past levels of housing growth**

2.30 The recent performance of housing delivery contrasts starkly with the longer-term record of housing completions, as confirmed by the Council’s 2017/18 Authority Monitoring Report. This is summarised in Table 1 below:

<table>
<thead>
<tr>
<th>Year</th>
<th>Housing Completions</th>
<th>Housing Target</th>
<th>Supply vs. Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>2008/09</td>
<td>598</td>
<td>1230</td>
<td>-632</td>
</tr>
<tr>
<td>2009/10</td>
<td>309</td>
<td>1230</td>
<td>-921</td>
</tr>
<tr>
<td>2010/11</td>
<td>529</td>
<td>1230</td>
<td>-701</td>
</tr>
<tr>
<td>2011/12</td>
<td>457</td>
<td>1230</td>
<td>-773</td>
</tr>
<tr>
<td>2012/13</td>
<td>316</td>
<td>1230</td>
<td>-914</td>
</tr>
<tr>
<td>2013/14</td>
<td>654</td>
<td>1230</td>
<td>-576</td>
</tr>
<tr>
<td>2014/15</td>
<td>933</td>
<td>1230</td>
<td>-297</td>
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<tr>
<td>2015/16</td>
<td>1089</td>
<td>920</td>
<td>169</td>
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<tr>
<td>2016/17</td>
<td>1067</td>
<td>920</td>
<td>147</td>
</tr>
<tr>
<td>2017/18</td>
<td>1208</td>
<td>920</td>
<td>288</td>
</tr>
<tr>
<td>2018/19</td>
<td>1189</td>
<td>920</td>
<td>269</td>
</tr>
</tbody>
</table>

Sources: DMBC AMP, MHLCLG live table, and DMBC Residential Land Availability Report 2018-19

2.31 What is very clear is that the 2014 based Standard Method is seriously underestimating the demand and need for housing within Doncaster. It is entirely consistent with the NPPF and the PPG to take into account these continuing completion rates in considering the appropriate level of housing to plan for within the area.

**Future levels of housing requirements**

2.32 As has been highlighted, the proposals for a revised housing requirement are 960 dpa. The flexibility required by the NPPF would suggest that the Plan should be able to accommodate this increase in the housing requirement without the need for a complete review.
**Implications of past rates of housebuilding**

2.33 As illustrated in the charts in Appendix 1, Appendix 1 illustrates over the past few years both the house price and the affordability ratio in Doncaster have not increased at the same rate as the region as a whole. There is a strong negative correlation between the higher rates of house building in Doncaster house price increases over the last 10 years (-0.75) and this becomes a very strong relationship in the last five years of the markedly higher completions (-1.0). This means that higher levels of house building have coincided with lower levels of house price rises experienced in the region as a whole.

2.34 There is a negative weak correlation between the higher rates of house building in Doncaster and the lower rates of affordability increases over the 10 year period, however this changes dramatically when one considers the five year period of higher housebuilding within which there is a very strong negative correlation (-0.98).

2.35 While a strong negative correlation does not prove causality, economic theory would suggest that an increase in the overall supply of housing might have a moderating effect on house prices and this appears to be the case in Doncaster. There is little else that might explain these differences in the rate of change between Doncaster and the wider region.

2.36 This suggests at least that the current level of housing completions is addressing directly the Government's objective of both higher levels of housing provision overall but just as importantly addressing the affordability.

**Recommendation on the level of housing to be planned for in the Local Plan**

2.37 The Local Plan should be updated to reflect the housing requirement of **1,073 dpa** for the Plan period to 2035. While the Standard Method produces the minimum for the purposes of paragraphs 60 and 73 of the NPPF, the Plan itself should respond positively to the evidence of economic-led growth, the pressure of this growth on housing demand as demonstrated by past completions rates over the last 4 years exceeding 1,000 dpa, and the updated Standard Method.

2.38 It is noted that the Inspector’s **MIQs** (INSP4) references that the Council’s response to PQ21 advises that the housing requirement for the Plan period (2015-2035) is a range: 11,700 (20
x 585) to 18,400 (20 x 920) dwellings. Further to this, in the Council’s response to the preliminary questions document (DMBC7), the Council set out that 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, and this will be recalculated each year throughout the Plan period. For this reason, the Council has resisted inserting a figure into the policy given it would, and already has, become out-of-date. Further to this, the Council state that “in 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 as alluded to in our preamble to the PQs”.

2.39 Further to the above, in response to PQ23 in the response to the preliminary questions document (DMBC7), the Council states the following:

“The Council’s view is that the approach is consistent. 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 supply and for calculating the Housing Delivery Test (HDT) result. 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.

As per our response to PQ21 above, the Council’s intention is to avoid setting an actual figure for the bottom of the range in the plan / policy itself. Although PPG 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 reforms and that the current methodology may prove only to provide an interim solution.

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. …”

2.40 It is noted that the PPG (reference ID 68-040-20190722) provides for plan makers to justify through plan-making and Examination that the requirement set out as a range and that in such cases the Housing Delivery Test, will measure Authorities against the lower end of the range.

2.41 The issue, therefore, is whether there should be a range or should the housing requirement
be a single higher figure based on factors which the PPG requires to be taken into consideration. In light of paragraph 15 of the PPG which states that where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, then the approach can be considered sound as it will have exceeded the minimum starting point. This would appear to describe the situation in Doncaster and as such there would appear to be no need for a range but simply the adoption of the higher employment led figure of **1,073 dpa**.

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)?*

2.42 Yes, both the NPPF and the PPG explicitly provide for Plans to exceed the minimum requirement as set by the Standard Method. There is a growth strategy in place for the area which is already being delivered, and as such a higher level of growth than the standard method is justified (PPG reference ID 2a-010-20190220).

2.43 Whilst the Plan states that it is to cover the period 2015 to 2035, it fails to make adequate provision for the post adoption period 2020 to 2035 in the following ways:

- Allocations are only to be made for the period 2018 to 2033 (as illustrated in Table 5 in the draft Plan) which means that the proposed allocations cover just 13 years from the adoption of the Plan (on the basis that it was expected in December 2020, although this is increasingly unlikely given that the Examination of the Plan is taking place in late 2020). This is contrary to paragraph 22 of the NPPF which states that strategic policies should look ahead over a minimum 15 year period from adoption. Further to this, it is notable that paragraph 20 of the NPPF states that strategic policies should, amongst other things, make sufficient provision for housing.

- The adopted approach reduces the overall level of housing requirement to be provided for following adoption by using a “residual” calculation to reduce the future planned requirement based on higher rates of completion prior to adoption of the Plan. There is no support in either the NPPF or the PPG to “discount” future levels of
requirement based on past levels of “over-provision”. Such over-provision may only be used to offset any shortfalls against requirements from previous years (PPG reference ID 68-032-20190722).

- The employment-led housing requirement of 912 dpa is based upon a projection for the period 2016 – 2026, i.e. just the first 6 years after the adoption of the Plan rather than the requirement for the Plan period as a whole. This is contrary to paragraph 22 of the NPPF which states strategic policies should look ahead over a minimum 15 year period from adoption.

2.44 The assumptions will have changed as a result of COVID, although the aspirations will not have changed. In terms of growth, certain sectors which are presently well-represented in the Doncaster economy have shown substantial levels of growth, in particular logistics. As such growth in these sectors might counterbalance short term reduction in other sectors.

2.45 The evidence of the past four years is not only the level of housing being planned for is deliverable but that a higher level of housing could be delivered to meet emerging demand.

2.46 It is important to note that from the date of adoption, the Plan will make provision for 882 dpa. However, this is not considered to be an appropriate level of housing requirement for the following reasons:

- The justification for the 882 dpa as a response to the planned levels of economic growth is flawed as it:
  - Discounts previous high levels of completions prior to adoption from the future annual requirement, which is contrary to the PPG;
  - Fails to respond to the evidence of employment growth for the whole Plan period. The employment-led housing requirement of 882 dpa is based upon a requirement figure of 912 dpa for the period 2016 to 2026; as such, it covers just the first 6 years of the Plan period after adoption (on the basis that it was expected in December 2020). The requirement for the Plan period (2015 to 2032) and the correct interpretation of the Council’s evidence base is that
there is a requirement for **1,073 dpa**;

- Fails to provide for specific allocations in accordance with the spatial strategy and distribution of development to support economic growth for the final years of the Plan period.

- The recent past completion rates suggest a much higher demand for housing. Recent levels of completions average some 1,097 dpa and reflect the growing market demand and economy. It is notable that these rates of completions are significantly above the outcome of the standard method. It is also notable that the PPG requires Local Planning Authorities to take such evidence into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests (reference ID 2a-010-20190220).

2.47 Further to the above, the Council’s approach fails to accurately reflect the strategic priorities and future economic potential of the Sheffield City Region, and further assessment of the proposed requirement is recommended to reflect the requirements of the revised Strategic Economic Plan (once formally published, following the current consultation and any subsequent required consultation) and to consider recent trends in jobs growth and housing delivery across the sub-region. This is anticipated to lead to a reassessment of current and future demographic trends in relation to future labour supply.

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)?

2.48 Yes. The evidence of the last 5 years was that there was an average demand for 1,097 dwellings a year (5,486 completions in total, see table 1 above). The complete mismatch between actual effective demand and the household projections at the heart of the standard method highlight the reasons why the Government is seeking to quickly move away from the present standard method. It should be noted that these levels of completions exceeded the employment-led forecasts for the start of the Plan period.

2.49 It should also be noted that while some of the economic growth planned for the region has taken place there remains other aspects of the strategy to take full effect.

2.50 The precise implications for labour supply and economic development in Doncaster will be a
result of various factors, including the impact of an ageing population and performance in different sectors. Nevertheless, pursuing a lower residual target (below the 912 dpa) beyond 2018 will not provide the necessary growth in labour supply to meet demand and support local job creation. To meet the economic strategy for the area, it is considered that the Plan should make provision for at least 1,073 dpa for the 15 years from the date of adoption (i.e. the period 2020 to 2035).

2.51 Further to the above, if the dwelling requirement for the 2015-2032 period of 1,073 dpa is not supported via strategic policies and allocations then there will be a growing disparity between the resident population and the ability to provide a local labour force to support the long-term growth objectives of the Sheffield City Region. This issue is compounded by the fact that the Pre-Submission Local Plan actually only makes provision for the residual requirement (i.e. 882 dpa) from 2018/19 to 2032/33, not even for the shorter term forecast requirement of 912 dpa.

\[d) \text{ Do previous levels of housing delivery in the Borough indicate a need for more than 585 homes per year?}\]

2.52 Yes. Recent levels of completions are over 1,000 dpa and reflect the growing market demand and local economy. These rates of completions are significantly above the outcome of the standard method. It is notable that the PPG requires Local Planning Authorities to take such evidence into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests (reference ID 2a-010-20190220).

\[e) \text{ Should the Plan aim to deliver more than 585 homes per year in order to help meet the need for affordable homes?}\]

2.53 Yes. The need for affordable housing has been identified as being 209 dpa (\textit{Housing Topic Paper} paragraph 6.2.11 (DMBC4)) which equates to 35% of the 585 dpa. The \textit{2019 Local Plan Viability Testing} update (SDEB48.1) found that a requirement of 23% affordable housing was deliverable in high and medium value areas but that lower value areas could only deliver up to 15% (\textit{Housing Topic Paper} 2019 (DMBC4)). As set out in DLP’s Statement on Matter 6 (para. 2.6-2.8), the Council’s evidence fails to demonstrate the deliverability of this level of provision in low value areas.

2.54 If future provision was made at 920 dpa then this would deliver 212 affordable dwelling per year, however because of the higher completion rates in the earlier part of the Plan period
then the future planned rate of provision is 882 dpa which would deliver 203 affordable dwellings a year.

2.55 The fact that in some part of the area the delivery of even 15% affordable housing provision is questionable, demonstrates that the Plan as presently drafted will not deliver the 209 affordable housing per year without additional policy intervention.

2.56 This is a further reason to support an uplift in the planned level of provision to 1,073 dpa as justified by the Council’s evidence base. If more homes are required to be delivered per year, more affordable housing will also be delivered per year which will help meet the Borough’s affordable housing need.
APPENDIX 1: HOUSE PRICE, AFFORDABILITY AND COMPLETIONS
Affordability Ratio: Doncaster and Yorkshire and Humberside

Various Clients
Local Plan Hearing Statement – Stage 4 – Matter 2
September 2020