Matter 6. Housing Development Requirements

**Site specific requirements for housing allocations without planning permission**

Policy 6 states that the housing allocations without planning permission listed in Tables H2(A-Q) will be developed in accordance with the specified developer requirements set out in Appendix 2. The Council has suggested changes to include an additional requirement relating to heritage assets for site ref 133 (Thorne) and to the boundary of site ref 247 (Rossington colliery).

The requirements relating to the eight housing allocations removed from the Green Belt were considered under matter 4.

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?

1. The HBF do not wish to comment on this question, at this time.

**Housing mix**

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?

2. The HBF understands the need for a mix of house size, type, price and tenure and is generally supportive of providing a range and choice of homes to meet the needs and market demand in the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements or the need to provide significant amounts of additional evidence.

3. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location. The HBF would also highlight the need for creating a housing market that will attract investors to Doncaster, and to provide an element of aspiration to ensure working people and families are retained within the area. The HBF consider that the Council need to be aware that the latest Housing Need Assessment will only ever identify current deficits and reflects a snap-shot in time. Therefore, even the latest HNA may not reflect the position at the time of an application. The HBF would like to ensure greater flexibility within this policy to acknowledge that the mix can vary both geographically and over the plan period.

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1 PPG ID:61-002-20190315
The reasoned justification to policy 8 refers to Appendix 4. Appendix 4 provides an indicative breakdown of the number of new affordable and market homes of different types (houses, bungalows and flats) and size (bedrooms) in different settlements based on the Council’s Housing Needs Survey 2019.

**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?**

4. The HBF are concerned at how quickly the information provided in Appendix 4 will date, and whilst it may provide a useful starting point, the HBF are concerned at how it may be used in practice. The points raised in relation to the HBF response to Q6.2 also apply in relation to the use of Appendix 4.

**Affordable housing**

Paragraph 6.9 of the Plan states that there is an identified need for an additional 209 affordable homes per year over and above the Council’s own build programmes. Paragraph 6.10 makes it clear that the affordable housing requirements of policy 8 part B take account of economic viability as well as housing need. The Council’s response to PQ34 advises that those requirements could deliver around 3,461 affordable homes between 2015 and 2035 (173 per year).

The Council’s viability assessments\(^2\) make a number of specific assumptions about affordable housing developments including about developer profits, tenure mix and development values.

**Q6.4. 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?**

5. The HBF does not dispute the need for affordable housing within Doncaster and indeed supports the need to address the affordable housing requirements of the borough. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability. The NPPF\(^3\) established the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened.

6. The Whole Plan Viability Testing (2019) report shows the issues of viability for a number of sites. It shows that schemes in the low value areas are not viable and will not be able to support the affordable housing requirement, they continue to be unviable even when the density is increased to 40 dwellings per net ha. The HBF are concerned that the affordable housing requirement along with the other requirements in the policy, may actually lead to further sites being found to be unviable. The Council should be mindful that it is unrealistic to negotiate every site on a one by one basis because the base-line aspiration of a policy or combination of policies is set too high.

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\(^2\) SDEB48.1 and Appendix PQ32.

\(^3\) NPPF Paragraph 34
as this will jeopardise future housing delivery. Therefore, site by site negotiations on these sites should occur occasionally rather than routinely.

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?

23. The Housing Needs Study (2019) recommends that the affordable tenure split for the borough is 75% social/affordable rented and 25% intermediate tenure, based on the tenure split preferences from the 2018 Household Survey. It suggests that 82% of existing households in need and 79.5% of newly forming households could afford intermediate tenure based on a 50% shared ownership property. The Whole Plan Viability Testing Report (2019) states that it has tested viability based on a tenure split of 75:25 between affordable rent and affordable home ownership. It goes on to state that it is considered appropriate to test different mixes of affordable housing (between affordable rented and ownership tenures) to see the impact this can have on scheme viability.

24. The NPPF states that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership. This suggests that if 100 homes were to be built, based on this policy 10 of those homes should be available for affordable home ownership. Based on Policy 8 and paragraph 6.9 of the Doncaster Local Plan:

- In high value areas 23% of homes should be affordable, of which 25% should be for low cost home ownership, therefore if 100 homes were to be built 23 of them would be affordable and 6 (rounded from 5.75) of those would be low cost home ownership; or
- In other areas 15% of homes should be affordable, of which 25% should be for low cost home ownership, therefore if 100 homes were to be built 15 of them would be affordable and 4 (rounded from 3.75) of those would be low cost home ownership. This is significantly less than is required by the NPPF policy. Therefore, the HBF do not consider that the policy and justification are consistent with national policy. The tenure split set out in the justification should be deleted, and instead reference could be made to the requirements of the NPPF for 10% of homes to be for affordable home ownership.

Internal space standards
The Council’s Housing Design Standards Policy Evidence Paper 2019 section 3 sets out the main evidence for the requirement in policy 46 part A for all new housing to meet the

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4 NPPF 64.
5 Housing Needs Study (2019) paragraph 5.28
6 Whole Plan Viability Testing (2019) paragraph 5.15.1
7 NPPF paragraph 64
8 SDEB25.
Nationally Described Space Standard as a minimum. This includes a finding that the majority of recently built homes in the Borough failed to meet those standards in terms of bedroom sizes and storage space.

The Council’s viability assessments\(^9\) assume dwelling sizes consistent with the space standards.

Q6.6. Is the requirement in policy 46 part A for all new housing to meet the Nationally Described Space Standard as a minimum justified by adequate, proportionate and up to date evidence about need, viability and timing\(^10\)?

25. This policy looks for all new housing to meet national spaces standards as a minimum. However, these enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a ‘need to have’ rather than a ‘nice to have’ basis.

26. PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that ‘where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

- **Need** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.

- **Viability** – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.

- **Timing** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’.

27. The Housing Design Standards Policy Evidence Paper (June 2019) surveyed 246 homes across 47 sites, to determine how many met the NDSS. It is not apparent if these sites had been submitted after the Government introduction of the NDSS, but it seems unlikely that it would have been in place at the time many of the applications were submitted. The Council indicate that through their research they have identified that a number of properties have not been built to the NDSS. They state that ‘201 out of the 246 plans assessed met the gross internal floor area based on their proposed number of bedrooms’ and that ‘plans were more likely to fail against the NDSS based on storage space or bedroom size, highlighting an internal design issue as opposed to dwelling plot size’. The Council also suggest that the NDSS would be beneficial in providing ventilation, reducing under-occupancy and over-crowding. However, the evidence provided is limited in terms of numbers of properties considered and the

\(^9\) SDEB48.1 and Appendix PQ32.

\(^{10}\) PPG ID:56-020-20150327.
potential market comparisons made. It is not evident from the information provided what ‘need’ there actually is for properties built to the standards there is no evidence that these smaller properties are not selling, there is no evidence provided that customers are not satisfied with these properties or that these properties are not comparable to other properties available in the market area. The HBF consider that if the Government had just expected all properties to be built to NDSS that they would have made these standards mandatory not optional.

28. The HBF consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The industry knows its customers and what they want, our members would not sell homes below the enhanced standard size if they did not appeal to the market.

29. It should be noted that the HBF Annual Industry Customer Satisfaction Survey published March 2020 and completed by 63,418 new homeowners highlights that 91% of people who have bought a new home would do so again. It also highlights that 93% of homeowners are satisfied with the internal design and layout of their new home. This does not suggest that new homeowners have issues with the size of rooms provided or that there is a need for the NDSS to be introduced.

**Housing for older people and people with disabilities**

The Council’s Housing Design Standards Policy Evidence Paper 2019 section 2 sets out the main evidence for the requirements in policy 46 parts B and C relating to accessible and adaptable dwellings [M4(2)] and wheelchair adaptable dwellings [M4(3)].

The Council’s response to PQ35 advises that the number of households with over 65 year olds or people with long term health problems or disabilities is expected to increase by 11,925 over the Plan period. The Council estimate that policy 46 part B could deliver a total of 6,291 accessible and adaptable homes and part C a total of 484 wheelchair adaptable homes.

The Council’s viability assessments assume an additional cost of £1,500 per dwelling to meet the M4(2) standard and an additional cost of £12,500 per dwelling to meet M4(3).

**Q6.7. Is the requirement in policy 8 part C for developers to demonstrate how the provision of housing types suitable for older people can be increased, especially bungalows, extra care facilities and supported living accommodation, justified?**

30. The HBF are concerned by the requirement in Policy 8 (D) which states that developments must demonstrate how provision of housing types suitable for older

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12 SDEB25.
13 SDEB48.1 and Appendix PQ32.
people can be increased, especially bungalows, extra care facilities and supported
living accommodation. Particularly when considered in relation to the following
sentence which looks for these types of development to have good access to local
services and facilities by means other than the private, which suggests that it will not
be appropriate for all sites to provide these types of homes. Therefore, the HBF do not
consider it is appropriate to require all sites to demonstrate how this provision will be
increased, instead, the policy could encourage these types of developments on sites
where it is appropriate.

31. The HBF consider that it would be more appropriate for the Council to provide a policy
in line with the PPG\textsuperscript{14} which looks for policies to set out how the Council will consider
proposals for different types of housing that older people are likely to require. The
policy should also give consideration to the diverse range of needs that exist, as the
health and lifestyles of older people can differ greatly, as can their housing needs. The
HBF suggest this type of policy could for example state that the Council will support
the provision of a range of homes specifically provided for older people including
bungalows, retirement homes, extra care facilities and supported living
accommodation in appropriate locations.

**Q6.8. Is the requirement in policy 46 part B for at least 65% of all new homes on
developments of over 0.5 hectares or 10 or more units to meet Building Regulation
standard M4(2) justified by adequate, proportionate and up to date evidence about
need, viability and site specific factors such as vulnerability to flooding, site
topography, and other circumstances\textsuperscript{15}?**

32. The HBF is generally supportive of providing homes that are suitable to meet the
needs of those with limiting long term illnesses or disabilities. However, if the Council
wishes to adopt the higher optional standards for accessible, adaptable and
wheelchair homes the Council should only do so by applying the criteria set out in the
PPG.

33. PPG\textsuperscript{16} identifies the type of evidence required to introduce such a policy, including the
likely future need; the size, location, type and quality of dwellings needed; the
accessibility and adaptability of the existing stock; how the needs vary across different
housing tenures; and the overall viability. It is incumbent on the Council to provide a
local assessment evidencing the specific case for Doncaster which justifies the
inclusion of optional higher standards for accessible / adaptable homes in its Local
Plan policy. Evidence of an ageing population or those with a disability does not in
itself justify the requirements of this policy, without appropriate evidence the HBF
would not support the introduction of this policy.

34. It must be remembered that all new homes will be built to part M4(1). According to Part
M of the Building Regulations meeting M4(1) will ensure reasonable provision for most
people, including wheelchair users, to approach and enter the dwelling and to access

\textsuperscript{14} PPG ID: 63-006-20190626

\textsuperscript{15} PPG ID:63-009-20190626 and PPG ID:56-007-20150327 and 56-008-20160519.

\textsuperscript{16} PPG ID: 56-007-20150327
habitible rooms and sanitary facilities on the entrance storey. As such these standards are likely to be suitable for the majority of people.

35. The Housing Design Standards Policy Evidence Paper (June 2019) identifies that 18.78% of the population of Doncaster was over 65yrs in 2017 and that 24.83% will be by 2035. The HBF does not dispute the ageing population within Doncaster, however, it is not clear how this ageing population and potential future need reflects in the need for 65% of all new homes to be provided at M4(2) standards. If it had been the Government’s intention that generic statements identifying an ageing population justified adoption of the accessible & adaptable homes standards, then the logical solution would have been to incorporate the M4(2) as mandatory via the Building Regulations which the Government has not done. The optional higher M4(2) standard should only be introduced on a “need to have” rather than a “nice to have” basis. The evidence does not demonstrate this need.

36. The Housing Design Standards Policy Evidence Paper (June 2019) also identified that older people and individuals with a long-term health problem or disability (LTHPD) would prefer to live in smaller, one or two bed- properties. It is not clear how this evidence has been considered in relation to the policy.

37. The Whole Plan Viability Testing (2019) report shows the issues of viability for a number of sites. It shows that schemes in the low value areas are not viable and will not be able to support the optional housing standards along with the cumulative requirements from other policies. The Whole Plan Viability Testing – Addendum (March 2020) continues to show that low value areas are unviable, and it shows that there are issues with medium value areas on brownfield sites. Therefore, the HBF has concerns in relation to the viability and deliverability of this policy, particularly alongside the cumulative impacts of other requirements of the plan.

38. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommend that an appropriate transition period is included within the policy. The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances which may make a specific site less suitable for M4(2) dwellings. The policy also needs to make it clear that where step-free access is not viable, the requirement for M4(2) should not be applied.

Q6.9. Is the requirement in policy 46 part C for at least 5% of all new homes on developments of over 0.5 hectares or 10 or more units to meet Building Regulation standard M4(3) justified by adequate, proportionate and up to date evidence about need, viability and site specific factors such as vulnerability to flooding, site topography, and other circumstances17?

39. It is noted that the policy refers to M4(3) ‘wheelchair adaptable dwellings’ it is assumed that this relates to M4(3)(2a) homes as set out in the Building Regulations Part M. It would be beneficial if this could be clarified within the justification text.

17 PPG ID:63-009-20190626 and PPG ID:56-007-20150327 and 56-008-20160519.
40. The Housing Design Standards Policy Evidence Paper (June 2019) highlights that information about the need for housing for wheelchair users is difficult to obtain\(^\text{18}\), and it is noted that much of the evidence provided is from national level information, such as the English Housing Survey. The HBF is concerned that national level information does not provide an evidenced case for Doncaster, it instead suggests that Government have made a decision that this information is insufficient to require a national requirement. The paper goes on to identify a need for 463-665 additional wheelchair adaptable dwellings over the plan period, it then goes on to assume, that this entire need should be met from the new housing provision. This does not seem appropriate, particularly given that a significant number of those surveyed and living in private homes have suggested that they do not wish to move. It is therefore likely that a significant proportion of this need will be met through conversion of existing homes. Therefore, whilst the paper goes on to suggest that the 463-665 represents 3.36-4.8% of the plan requirement, this is likely to be a significant over-estimation of the need to be provided from the new market housing stock. This suggests that the 5% requirement is not appropriate.

41. The HBF is also concerned that requiring the general provision of new homes built to the M4(3) standards will do little to meet the needs of people requiring these properties. There is no information to suggest that these people are looking to move home or that they are considering moving to locations where these new homes are to be built. There would also be no limitations on the sales of the properties, which means that they may never be occupied by someone requiring an adaptable property.

42. The Whole Plan Viability Testing (2019) report shows the issues of viability for a number of sites. It shows that schemes in the low value areas are not viable and will not be able to support the optional housing standards along with the cumulative requirements from other policies. The Whole Plan Viability Testing – Addendum (March 2020) continues to show that low value areas are unviable, and it shows that there are issues with medium value areas on brownfield sites. Therefore, the HBF has concerns in relation to the viability and deliverability of this policy, particularly alongside the cumulative impacts of other requirements of the plan.

43. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommend that an appropriate transition period is included within the policy. The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances which may make a specific site less suitable for M4(3) dwellings. The policy also needs to make it clear that where step-free access is not viable, the requirement for M4(3) should not be applied.

**Design of housing developments**

\(^{18}\) Housing Design Standards Policy Evidence Paper (June 2019) Paragraph 2.72
Chapter 12 of the Plan contains various policies intended to provide a framework for the assessment of the design of development proposals, including for new homes. Policy 45 is specifically about residential design.

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.

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.

7. The HBF note that reference to Building for Life is now dated, and new guidance is titled Building for a Healthy Life.