Main Issues: Whether the Council’s strategy for meeting its housing requirements is sound?

2.5 Is expressing the housing requirement as a range consistent with national policy or otherwise justified? If so, what should the bottom range be (assuming that it must be a fixed figure)?

2.5.1 Principally, this should be seen in the context of the National Government's aim of delivering significant growth across the country and addressing the housing crisis, development proposals should be determined on their ability to meet the requirements of sustainable development and positively considered. The application of a lower and upper limit of housing numbers will be ineffective in achieving this aim, hampering growth. In short, where there is a need for new homes, there should be no cap on sustainable development.

2.5.2 Furthermore, the NPPF is clear that Local Planning Authorities are to be ambitious but realistic in their approach to growth and that the LHN figure should be seen as a minimum (paragraph 60). It is explicit within the Peter Brett DMBC ‘Economic Forecasts and Housing Needs Assessment’ (June 2018) that the figure identified in the Government's Standard Methodology is not ambitious. It is 'policy off' and does not take into account projected economic growth in the Sheffield City Region and Growth Deal which Doncaster has already committed to. It should therefore be removed from the Local Plan and the use of a housing requirement 'range' should be removed in favour for a single minimum target reflective of the 'policy on' LEP partnership agreements in place. In the interest of effective, positive and justified plan making.

2.6 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)?

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?

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)?

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

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

2.6.1 In addition to the concerns outlined above regarding the range of housing need outlined within the Local Plan, we also have significant concerns regarding the target of 920 dwellings per annum. Each question has been addressed in turn below.

1 MHCLG August 2020 Planning for the Future p.12
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a) Is it appropriate to plan for a higher figure than the standard method indicates (585 homes per year)?

2.6.2 As outlined above, it is essential that a higher figure than the 585 homes per year identified in the current standard method is planned for. There are two points to make in this regard.

2.6.3 Firstly, it is important to highlight that the Standard Method in its current form is flawed, is still subject to review and should not be wholly relied upon. At the time of writing, the MHCLG consultation paper ‘Changes to the current planning system’ recognises these flaws and proposes a revised Standard Method for calculating Local Housing Need which will deliver at least 300,000 homes a year across the country. For Doncaster it suggests a revised figure of 961 dpa as the minimum LHN need. We appreciate the planning reforms are yet to take full effect but this shows the need for a higher figure. The failure of the floored original Standard Method calculation to accurately plan for housing need within the North is well documented (see for example Richmondshire District Council SM1 requirement of 14 dpa revised to 124dpa and Burnley of 62dpa revised to 224dpa).

2.6.4 Adopting this figure now will ensure robustness in plan making, avoiding the need for early review.

2.6.5 Secondly, DMBC is a member of the Sheffield City Region. The Sheffield City Region [SCR] Strategic Economic Plan (2015-2025) outlines an ambitious growth strategy for the City Region in the context of duty to cooperate. This strategic plan seeks to deliver 70,000 net additional jobs, increase GVA by 10% and create 6,000 new businesses. This is supported by a £10 million transport fund. This is in addition to the £166 million ‘Transforming Cities’ SCR fund announced in the March 2020 budget. We note Doncaster has used this funding to assist with the construction of the Doncaster Sheffield Airport expansion.

2.6.6 Doncaster Council have stated that they are taking an ‘employment led’ approach to development through the Local Plan\(^2\). It follows then that if employment needs are ‘policy on’, housing growth should similarly be ‘policy on’ otherwise the strategy for both fails. We note at paragraph 3.8.6. of the Housing Topic Paper 4 that: “The city region does not connect jobs and housing targets..” It is agreed the relationship is complex but the mutual rise cannot be discounted. To do so is ineffective and unjustified.

2.6.7 Planning Policy Guidance provides the national policy on this matter:

“The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth…. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates…Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);”

\(^2\) Doncaster Local Plan 2015-2035 (As submitted) Chapter 3
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- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground 3;“

2.6.8 Whilst now out of date, page 41 of the 2018 Housing and Economic Needs Assessment states that the ‘policy on’ uplift would represent a 56% rise on the LHN or an additional +327 dpa. An up to date evidence base on this matter is required, as the current evidence base is shown to be out of date. However, in order to be consistent with national policy, capable of planning for the next 15 years, applying a ‘policy on’ proportionate uplift would mean a minimum baseline housing need of c. in the region of 1,100 dpa or 22,000 dwellings across the plan period.

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?

2.6.9 We have explained how the economic growth assumptions outlined within the Local Plan are based upon the Sheffield City Regions Strategic Economic Plan and in turn DMBC’s Economic Forecasts and Housing Needs Assessment (June 2018). The Sheffield City Region (SCR) Strategic Economic Plan sets out a strategy and vision for accelerating business growth and job creation in the City Region and is supported by the European Structural and Investment Funds Strategy (ESIF).

2.6.10 The Sheffield City Region LEP Board was formed in December 2010 and consists of Barnsley, Doncaster, Rotherham, Sheffield and Chesterfield, and their surrounding areas. Within the SCR Strategic Economic Plan, Doncaster is identified as ‘A high quality urban centre, attractive retail opportunities and excellent rail links that contribute to its multimodal logistics and advanced engineering offer’.

2.6.11 Through Private Sector involvement, the LEP have been awarded a significant amount of government funding to achieve their strategic vision of delivering 70,000 jobs, 6,000 businesses and an increase in GVA in excess of £3 billion, receiving unequivocal support from Doncaster at the time.

2.6.12 The SCR targets are based upon the historical performance of the city region and their broad aim that this performance should improve, both in absolute terms and relative to the UK. The key element of the Strategic Economic Plan is the aim to achieve job growth of 1% p.a. For the SCR as a whole this would result in an increase by 7,800 jobs, therefore the 7,000 job growth target is conservative and achievable.

2.6.13 In addition, the market and economic conclusions drawn from the Economic Forecasts and Housing Needs Assessment, undertaken by Peter Brett Associates are reality tested. With economic and employment forecasts considered against market testing to verify that development is in line with forecasts is likely to be in demand and financially viable. The outcomes of this independent assessment translate forecasts into employment land. This has been incorporated into the employment land requirement in the Local Plan and thus the housing requirement, being job led (see for example Policy 7 - Doncaster Airport where the amount of housing is explicitly job led).

3 Housing and Economic Needs Assessment PPG Paragraph: 010 Reference ID:2a-010-20190220

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2.6.14 It is reasonable to suggest that given the involvement and support of the Sheffield City Region, the substantial government funding and the comprehensive plan for economic growth across the LEP, Doncaster will benefit from the economic growth projected through the SCR Strategic Economic Plan and separately identified within the DMBC Economic Forecasts and Housing Needs Assessment.

2.6.15 However we wish to emphasise that this cannot be achieved through a policy approach to economic development alone, it must be matched by an ambitious approach to housing delivery solidified through local policy to help drive and support this growth otherwise the Local Plan will not be sound (see Calderdale Local Plan Examination\(^4\)).

2.6.16 In our response to question 2.6 a) we noted the need to update the evidence base given the change in LHN baseline need. The point is equally valid here and we expect an updated Evidence Base to be provided.

2.6.17 We agree that there would be an uplift as set out in our responses to 2.6 a) and b). We do however submit that a revised evidence base be undertaken in the context of the changes to the standard method.

\(^4\) Letter from Insp.Katie Child to Calderdale Stage 1 – post hearings letter dated 16th July 2019