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)?

2.1 We do not support the council’s desire to express the housing requirement as a range. The justification given by the council\(^1\) is to provide some protection against the application of the “tilted balance” in the event that the Plan doesn’t deliver as expected. It is, in effect, planning for failure. Either the council believe the Plan will be effective or they do not; either 920 new homes are needed each year, or they are not. Attempting to hedge their bets in this manner does not provide certainty and is not justified. The housing requirement should be set as a single fixed figure.

2.2 That single fixed figure should be at least 920 dwellings per annum. This represents the council’s assessment of the number of homes that are actually needed over the Plan period in order to deliver their housing and economic strategies. If the council believe that figure to be correct, it should be the housing requirement and the Plan should set out to deliver it.

2.3 If the Inspector disagrees with that assertion and is minded to allow the council to use a range, the bottom end of that range must be a fixed figure. The current approach attempts to define the bottom end of the range as the figure produced by the government’s standard method algorithm from time to time. This fails to provide certainty, a key objective of the local plan process.

2.4 Just as importantly, it could result in the illogical situation were the bottom end of the range is higher than the top end of the range. The government is currently consulting on an update to the standard method algorithm\(^2\) which, if adopted in its current form,

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\(^1\) PQ21 and PQ23, Doncaster Council Response to Preliminary Questions, June 2020 (Examination Library Reference DMBC7)

\(^2\) MHCLG, Changes to the current planning system, August 2020
would result in a housing requirement for Doncaster of 961 dwellings per annum (dpa) – some 41 dpa above the current top end of the range. This is clearly perverse.

2.5 To ensure that the Plan is sound, the bottom end of the range should be established as a fixed figure.

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)?

2.6 It is appropriate for the council to Plan to deliver more homes than the standard method indicates. The Planning Practice Guidance makes clear that the standard method produces a minimum starting point for setting the housing requirement and outlines a range of circumstances where it may be appropriate to exceed that figure. At least two of the examples from that open list – deliverable economic growth aspirations and past-delivery rates which exceed the standard method figure – apply in Doncaster.

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

2.7 The Plan should aim to deliver more than 585 dwellings per annum (dpa) in order to meet affordable housing need. In fact, it should aim to deliver more than 920 dpa.

2.8 The need for affordable homes is stated to be 209 dpa which equates to approximately 23% of the housing requirement. The majority of housing development is intended to be focussed in those parts of the borough where viability testing suggest that the maximum viable level of affordable housing is 15%. This indicates that the Plan will not currently meet affordable housing need.

2.9 To ensure affordable housing need is met either the upper end of the housing requirement should be increased or the distribution of growth should be adjusted so that more development comes forward in those parts of the borough where a higher level of affordable housing provision is viable.

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3 Planning Practice Guidance, Paragraph: 010 Reference ID: 2a-010-20190220