Doncaster Local Plan Examination
Matter 2 Statement - Quantity of Development needed in the Borough

Issued  September 2020

1.1 This Hearing Statement has been prepared on behalf of our client (Swan Homes Ltd) (ID 05291). Our client seeks to respond to Questions 2.4, 2.5 and 2.6 only.

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?

1.2 No. Policy 3 states 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 not however state what the Local Housing Need figure is. This is actually identified within the ‘Economic Forecasts and Housing Needs Assessment’ (June 2018) (prepared by PBA) [SDEB44] as 585dpa based on the Standard Methodology as set out in the NPPF. The reader can then establish that the housing requirement for Doncaster is somewhere within a range of between 585 and 920dpa over the plan period.

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)?

1.3 Expressing the housing requirement as a range is not consistent with the requirements set out in the NPPF.

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 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.”

1.7 This suggests that at housing requirement expressed as a range is not the norm and needs to be clearly and robustly justified.
1.8 Both the NPPF and the PPG are clear that a single housing requirement figure should be set out within a Local Plan. Not only does the Plan fail to provide a single figure, it doesn’t even provide the figure that sets the lower end of the range. To make the Plan sound the Council must identify a single housing requirement figure. It is also noted that that requirement should then be expressed as a minimum or ‘floor’. Using the current approach, it could be implied that the 920dpa figure at the top end of the range is actually a limit or ‘ceiling’. This highlights why a range is inappropriate.

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 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)?

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 to supporting authorities who want to plan for additional growth. 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, with past delivery being 1,265dpa on average over the past three years.

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 driver in identifying a housing requirement above the minimum level of housing set out by the standard method is the need 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 and that the overall level of housing need identified by the standard method is sufficient to ensure that land does not become a limiter in achieving 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 currently identified in the Plan. The proposed changes to the standard method would result in 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) to allow for an element of non-delivery and ensuring that the national figure of 300,000dpa is achieved. Therefore, identifying the 920dpa in Doncaster would demonstrate to the Government the Council’s commitment to the delivery of new homes and support the Government’s aim to deliver 300,000 homes per annum nationally.

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?

1.15 The upper end of the range presented as the current housing requirement at Policy 3 of 920dpa, rounded from 912dpa, is based on an economic growth of 1% over the plan period, based on the emerging Sheffield City Region jobs target. This future growth is aspirational and achievable, given that in the ‘Economic Forecasts and Housing Needs Assessment’ [SDEB44] the analysis identifies that in the period 1997 to 2015, in percentage terms, the number of jobs in Doncaster increased by 1% per annum (page 11). This highlights the strong historic jobs growth which has been achieved in Doncaster, supporting the future economic aspirations underpinning the upper end of the housing requirement identified in Policy 3 of the Plan.

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)?

1.16 Greater levels of economic growth would generate more jobs alongside an anticipated improvement in the type of jobs available. This in turn would result in better life chances for local people including an improvement in incomes which would facilitate increased demand for homes. New jobs would help to enable concealed households enter the housing market and establish a home of their own, increasing the demand for homes. The market has demonstrated that it can deliver this level of housing in the past, as set out under point d) below.

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

1.17 The Doncaster Residential Land Availability Report 2018/19 [SDEB26] shows average net completions over the last 3 years of 1,265.

Table 1 Doncaster Past Net Housing Delivery

<table>
<thead>
<tr>
<th>Year</th>
<th>Net housing delivery</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016/17</td>
<td>1,049</td>
</tr>
<tr>
<td>2017/18</td>
<td>1,557</td>
</tr>
<tr>
<td>Year</td>
<td>Net housing delivery</td>
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<tr>
<td>2018/19</td>
<td>1,189</td>
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</tbody>
</table>

Source: Residential Land Availability 2018/19

*number to be confirmed but current Council estimate based on methodology used in RLA

1.18 Doncaster’s Publication Local Plan identifies a housing requirement as a range, of which the upper end is above the standard method but below trends in past delivery and the aspiration to support an economic led future for Doncaster. This confirms that in order to plan positively for the future it would be more appropriate for the housing requirement in Doncaster to be set at the 1,073dpa identified in the ‘Economic and Housing Needs Assessment’ [SDEB44] to ensure that the vision can be achieved. That figure is well within the range that has been delivered over the past four years.

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

1.19 The Plan identifies an annual affordable housing need of 209 affordable homes. The PPG (paragraph ID 2a:024) highlights that an increase in the total housing figures included in the plan may be required where it could help deliver the required number of affordable homes. The Council’s response to PQ34 [DMBC7] identifies a total of 3,461 affordable homes could be delivered between 2015 and 2035 (on average 173 per year). Therefore an increase in the housing requirement would help to achieve the 209 affordable housing need per annum identified in the Housing Need Assessment.

1.20 Viability is acknowledged as an issue in Doncaster, with the Whole Plan Viability Testing - Update (May 2019) acknowledging viability pressure was at its highest for schemes in low value areas (Exec Summary). Increasing the overall housing requirement would mean that a lower affordable housing requirement could therefore be set for each site, thereby assisting viability whilst ensuring the overall need of 209 affordable homes per year is achieved.

Word Count: 1,598