Doncaster Local Plan Examination
Theakston Estates Limited (ID 01937)
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 (Theakston Estates Limited) (ID 01937). Our client responds to Questions Q2.4, Q2.5, Q2.6 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 Policy 3 identifies the need to deliver 18,400 new homes in the period 2015 to 2035 (920 per annum), with sufficient land allocated to deliver 15 years' supply of housing (13,230, or 882 dpa once supply in the years 2015 to 2018 is deducted from the overall requirement).

1.3 Policy 3 then goes on to state 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 920 dpa. Policy 3 does not however state what the Local Housing Need figure is. This is identified within the ‘Economic Forecasts and Housing Needs Assessment’ (June 2018) (prepared by PBA) as 562 dpa based on the standard methodology as set out in the NPPF (at the time of publication of the PBA document). Therefore the implication of this is that the housing requirement for Doncaster is a range of between 585 and 920 dpa over the plan period.

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住房 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 Both the NPPF and the PPG are clear in their wording that a single housing requirement figure should be set out within a Local Plan.

**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)?

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

1.8 This suggests that at housing requirement expressed as a range is not the norm and needs to be strongly justified.

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 c.300 (depending on the start date of the standard method calculation) additional homes per annum above the standard methodology 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.

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 4:2a-010 is clear that the government remains committed to ensuring more homes are built and support authorities who want to plan for additional growth and as such the standard method is a minimum starting point in determining the number of homes needed in an area. 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.

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 drivers in identifying a housing requirement above the minimum level of housing set out by the standard methodology include the desire 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’ identifies that to do this, an additional 335 homes per annum will be required in addition to the minimum number of homes identified through the standard method.

1.13 It should also be highlighted that the ‘Economic Forecasts and Housing Needs Assessment’, through its analysis, identifies that 1,073 dpa are required to support the 1% economic growth aspirations. This is 153 dpa greater than the top end of the housing requirement range identified in the plan, equivalent to 2,295 dwellings over the 15 year plan period. The document states that the policy-led scenario is ambitious and therefore job growth and housing demand predicted
may not materialise. This gives more weight to the need to identify the specific housing requirement as the top end of the range, rather than a range itself.

1.14 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.

1.15 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 aligned with the top of the housing requirement range identified in the Plan. The proposed changes to the standard methodology help to identified 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). Therefore identifying the 920dpa in Doncaster would demonstrate to the Government the Council’s commitment to the delivery of new homes and supporting the Government’s aim to deliver 300,000 homes per annum.

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?

1.16 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 yet achievable, given that in the ‘Economic Forecasts and Housing Needs Assessment’ the analysis identifies that in the period 1997 to 2015, in percentage terms, 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)?

1.17 Greater levels of economic growth would generate more jobs alongside an anticipated improvement in the type of jobs available. This in turn is anticipated would result in better life changes for local people including an improvement in incomes which would facilitate increased demand for homes. New jobs would help to enable people enter the housing market and establish a home of their own, increasing the demand for homes.

1.18 The evidence within the Economic Forecasts and Housing Needs Assessment states;

“the message from the forecast is that, in a business as usual economic scenario, if population grows in line with the official projections Doncaster is likely to be on the brink of a labour shortage. In other words, there is a threat that local economic growth will be constrained by labour supply” (paragraph 2.7 page 9)

1.19 The report goes on to look at a range of other sensitivities against this baseline forecast which in turn result in changes in the labour market including; lower unemployment, higher proportions of people participating in the labour market and fewer people commuting out.
1.20 These changes would themselves result in increased demand for homes as more local residents are in a position to access the housing market.

1.21 The report then goes on to consider the policy led scenario which is based on the 1% economic growth underpinning the emerging Sheffield City Region (SCR) Strategic Economic Plan. The study concludes on this scenario that if the Experian modelling is correct, in which labour demand grows in line with the SCR target then the 2014 population will not be enough to match labour demand (paragraph 2.34).

1.22 The report finally considers a jobs-led scenario in which the modelling considers the labour force required to meet the labour demand generated by the SCR jobs growth target being realised in Doncaster.

1.23 In assessing the impact of these economic and labour force implications in Doncaster, the ‘Economic Forecasts and Housing Needs Assessment’ goes on to consider the implication these scenarios have for future housing need. For the jobs-led scenario, the report identifies a need for 1,073 dpa.

1.24 The scenarios considered in the report highlight that even with the baseline forecast there is a risk that economic growth with be constrained by labour market shortages. It is clear that if the Local Plan is to achieve its economic ambition that a significantly higher number of homes are required than the identified baseline growth, which itself risks labour market shortage.

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

1.25 The Doncaster Residential Land Availability Report 2018/19 shows average net completions over the last 4 years of 1,205 which has been achieved without an up to date plan in force.

<table>
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<th>Year</th>
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Source: Residential Land Availability 2018/19

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

1.26 The PPG at paragraph ID :2a-010 is clear that the government remains committed to ensuring more homes are built and support authorities who want to plan for additional growth and as such the standard method is a minimum starting point in determining the number of homes needed in an area. 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.

1.27 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 suggests 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 1,073 dpa identified in the ‘Economic and Housing Needs Assessment’ to ensure that the vision can be achieved.

1.28 It is our view that the approach the Council has taken in the Local Plan in respect of the housing requirement identified is cautious for several reasons;

1. It does not plan for 15 years, or indeed to the end of the identified plan period;

2. The level of growth identified is less than the historic housing requirement; and

3. The level of growth is less than recent delivery rates.

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

1.29 The Plan identifies an annual affordable housing need of 209 affordable homes. In order to achieve this level of affordable housing delivery, the higher end of the identified housing requirement range would be required to be delivered with affordable housing delivered at (on average) 23% as set out in Policy 8 of the Local Plan. The 2019 Viability Testing Update also concluded that development sites in the Borough’s high and medium value areas are viable with a 23% affordable housing requirement. These areas cover the majority of the Doncaster Local Authority area.

1.30 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 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.

Word Count: 2,052