Reference Number 03259 and 03453

Submissions to Matter 2  Quantity of Development needed in the Borough
on behalf of Mr G Turnbull
Submissions to Matter 2  Quantity of Development needed in the Borough
on behalf of Mr G Turnbull

We act for Mr W Turnbull of Skellow Grange, who is part landowner of the following sites

- Site ref 164/130  Warning Tongue Lane Doncaster
- Site ref 165/186  Skellow/ Carcroft

We are instructed to attend the examination on his behalf and to comment on the issues that affect the development of these sites and associated matters, that have been set out in our original submissions to the Doncaster Local Plan.

Our client supports the allocation of both of the above sites and wishes us to contribute at the examination to assist in finding the plan sound with relevant modifications.

We have addressed the relevant questions in this Matter 2 and set out our comments below.

M2. Quantity of Development needed in the Borough

Q2.4. Does the Plan clearly establish a housing requirement figure for the Borough for the Plan period as required by national policy?

The submitted Plan sets out that the housing requirement based on the combination of figures from the standard methodology and an additional amount required to meet planned economic growth. The combination of these figures is a requirement of 912 dwellings per annum net.

Over the entire plan period this would be 18,240 dwellings net.

The residual requirement would be 18,240 dwellings minus the completions in the years 2015-2018 which are some 3,400 units, giving around 15,000 new dwellings required.
Policy 3 should be clear about this as the overall requirement and that the Plan will allocate land in sufficient quantity to meet the requirement for the 17 years from 2018. It is unclear why this policy says that it plans for 15 years, when 17 years of the plan period remain from the date of the calculations.

Policy 3 should be clear and concise setting out the overall requirement and the residual requirement to be met. The Policy should not be complicated by reference to calculating the five-year land supply which is another matter.

The Government have recently published the consultation document that reconsiders how the housing requirement should be calculated in order to boost the supply of housing land and to deal with the problem of the 2014 household projections. Whist this is at a consultation stage it is clear that the direction of travel is to boost the housing supply to ensure the amount of new homes meets the national targets.

Whist this may not directly impact on this Plan due to the stage of development of the Plan It is clear that the objectives are to ensure that authorities have sufficient land available to meet and boost the housing requirement and to allow for a degree of flexibility through losses in the supply.

**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)?**

The Planning Policy Guidance Paragraph: 012 Reference ID: 2a-012-20190220 indicates that the method for calculating the housing need provides authorities with an annual number which can be applied to the whole plan period. It does not refer to a range of requirements. setting a range requires there to be special justification.
Policy 3 does not read as a range as drafted it reads as 18,400 new homes at 920 per annum. The Council set out in their answers to PQ 21 and 23 that the whole range idea is to allow flexibly of the plan due to the global circumstances and that setting a range is ultimately flexible because of changing government advice. It is considered that this simply will lead to uncertainty about the plan and what it is trying to achieve. It has got to be clear what the housing requirement of the plan is in the circumstances where this will need to be tested in the future and a basic clear understanding of the Plans objectives. It is not considered that a range is necessary to allow flexibility. Planning for the required figure of 18,400 will give the most flexibility, in that sufficient land should be made available to meet that requirement. The housing market will react to any of the circumstances that the Council refer to and develop land as demand and the economic climate dictates. What is required for flexibility is that sufficient land be made available to ensure that there is a range and choice of sites suitable for development to take place.

The choice of a housing range by the Council is more to do with the calculation of the 5-year housing land supply and the lower end of that figure being used in the land supply calculations. Paragraph: 027 Reference ID: 68-027-20190722. Doncaster have been sensitive over this issue over many years as evidenced through several major planning appeals and their actions following appeals being allowed.

However, it is considered that the way out of the position that the Council have found themselves in in past years is to plan positively for the number of dwellings required in the Borough to meet the basic methodology and the economic uplift. Making land available for this will mean that sufficient land is available and avoid unnecessary and costly appeals.
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)?

We consider that it is appropriate to plan for the higher figure and this is both justified and positive. The NPPF sets out the government’s aim to boost the housing supply and to plan for sufficient land to do so. The standard method of calculating the requirement is only the base position and is a minimum figure and it is legitimate for Authorities to plan for additional homes over the base position to meet a variety of circumstances as set out in the PPG and growth strategies are expressly mentioned as one of those circumstances.

The PPG also sets out that the government will support ambitious authorities who want to plan for growth.

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?

The economic growth strategy on which the additional homes are based is the strategy for the whole city region. Doncaster is well placed to maximise economic growth in transport and logistics as recognised in the Peter Brett report, due to geographical; advantages and the presence of the airport. The evidence base acknowledges that the growth is aspirational, and is deliverable in terms of the housing completions it would require as evidenced by the completion figures for the last four years [which all exceed 1,000 units] and the existing success of the employment locations in the Borough and the opportunity to maximise this type of employment potential.
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)?

The evidence base document SDEB44 translates the requirement for economic growth to households

*For the plan period 2015-32, 1,073 dpa*

*For 2016-26, the assessment period used in the new standard method, 912 dpa*

The figure now used in the plan is 920 dwellings per annum, which is below the overall plan period assessment by 153 dwelling per annum. The report does say that a median or lower figure may be chosen but there is no discussion of how this has been arrived at. The figure used is therefore a conservative figure compared to the evidence base analysis.

If the growth materialises as predicted then the figure in the Plan is a shortfall. The documents set out at para 4.31

*The logic of the job-led housing numbers is that, if job opportunities in Doncaster improve against the baseline forecast, more people will be willing and able to live in the borough*

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

As set out above the housing delivery in the Borough has exceeded the 920 dwellings per annum for the years 2015-2019, and was close to this level in 2014. There is therefore a clear need for more dwellings than the base line figure of 585.
e) Should the Plan aim to deliver more than 585 homes per year in order to help meet the need for affordable homes?

Yes, the plan should deliver more than the base level of homes to assist with the delivery of affordable homes. 209 affordable units are required each year over and above the Council’s own building programme. The Council set out in table PQ 34 that 3,461 is the identified supply from various sources including the allocations made in the plan on the overall target of 920 dwellings per annum. On this basis this would deliver an average of 173 dwellings per annum and this would still be below the identified need of 209 units.