M2. Quantity of Development needed in the Borough

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?

Yes. At least 481 hectares of employment land and at least 920 (net) new homes each year are proposed over the plan period 2015-2035. That equates to 18,400 homes in total over the 20 year 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)?

It is key that there is flexibility built into the Plan with regard to housing numbers and future development opportunities. This is to ensure that housing need and demand is met throughout the Plan period. It is therefore vital that the proposed housing figure is a minimum figure, rather than viewed as a cap and a restriction to new development.

It is not considered consistent with National Policy to place a restrictive cap on the housing requirement. In the interest of effective, positive and justified plan making, where there is a need for new homes, there should be no cap on sustainable development. As such, the housing requirement should be 920dpa as a fixed minimum figure rather than setting a range with a cap. Please refer to our comments set out in respect of Question Q2.6, below for further detail on this matter.

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)?
   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?

As per paragraph 60 of the NPPF 2019, “To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.”. It is considered that it is appropriate to plan for a higher figure than the standard method indicates as exceptional circumstances have been demonstrated in that the figure

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identified within the standard Methodology does not take into account projected economic growth in the Sheffield City Region and Growth Deal which Doncaster has already committed to.

As required by the NPPF, the emerging Local Plan must define the overall level of growth over the Plan period (up to 2035), based on the requirement to meet the Borough's objectively assessed needs (OAN). Determining the OAN for housing is usually assisted by the Strategic Housing Market Assessment (SHMA).

We support the approach proposed by the Council to meet at least 920 dwellings per annum due to the fact that, as previously highlighted by the Home Builders Federation, the standard method could have implications for housing targets in some areas of the country (principally in the north of England), where economic growth strategies may not be supported by local authorities that plan for the minimum number of additional dwellings as indicated by the standard methodology. By only using the proposed methodology it could lead to the Borough not planning enough homes to support the economic growth strategy.

If the Council does not seek to meet the most appropriate level of development needed it is considered that the Borough would suffer significantly from out-migration, reduced / limited employment opportunities and have a detrimental impact on the existing supply of local services and facilities. This goes against the strategic Vision, Strategy and Objectives of the Plan and would therefore be unsound as the plan would not have been planned positively.

Additionally, it is also considered important to highlight that, at the time of writing, the MHCLG consultation paper ‘Changes to the current planning system’ recognises that the current standard method could have implications for housing targets in some areas of the country and proposes a revised Standard Method for calculating Local Housing Need (LHN) 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 to be adopted to meet need and demand across the Borough.