

Matter 1. Legal and Procedural Requirements and other General Matters

Plan period

The Council's response to PQ7 advises that the Plan's strategic policies in relation to housing and economic development identify sufficient land to meet the needs to at least 2036, despite the plan period ending in 2035.

Q1.8. Is the Plan consistent with national planning policy that expects strategic policies to look ahead over a minimum 15 year period from adoption, or is it otherwise justified?

1. It is noted that the Plan period runs from 2015 until 2035, NPPF¹ looks for Plans to have a 15-year period from adoption. As the examination is expected to take place in late 2020 it is unlikely that the Plan will be adopted in 2020. Therefore, the HBF consider that it may be beneficial to take a cautious approach and to extend the Plan period.
2. The HBF also note that the Plan period for land supply runs from 2018, and in the case of housing appears to run until 2033. This appears confused and an unnecessary complication.

Monitoring

The Council is required to publish monitoring reports, at least once a year, setting out the extent to which the Plan's policies are being achieved². The Council will need to review the Plan's policies to assess whether they need updating at least once every five years, and then update the Plan as necessary³.

Paragraphs 15.12 to 15.14 explain how the Council will monitor the Plan, and Appendix 12 includes monitoring indicators, targets/direction of travel, and key delivery partners for the vision, objectives and most policies.

Q1.9. Will the approach set out in paragraphs 15.12 to 15.14 and Appendix 12 ensure that the Plan can be effectively monitored so that the extent to which its policies are being achieved will be clear?

3. Paragraph 15.12 to 15.14 explain that the Council will produce an Annual Monitoring Report, to monitor the indicators set out in Appendix 12. Whilst Appendix 12 sets out the indicators and direction of travel, it very rarely provides any SMART (Specific, Measurable, Achievable, Realistic, and Timely) targets and does not provide any actions that will be undertaken if these targets are not met. For example, it provides an indicator for the 'number of net homes built' but this is not related to the housing requirement within the Plan or the Local Housing Need (LHN) as set by the standard method, the target is only to 'increase'. The HBF do not consider this is sufficient to

¹ Paragraph 22 of NPPF 2019

² Section 35 of the 2004 Act and regulation 34 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) ("the 2012 Regulations").

³ NPPF 33.

ensure that the Plan will be effectively monitored or to ensure that the policies are being delivered. The HBF considers that clear targets should be included, and they should be specific, measurable, achievable, realistic, and timely. The HBF also considers that actions should be identified for what action will be taken if the targets are not met, for example, working more closely with the development industry, or reviewing the Plan or particular policies or providing more allocations.

Viability evidence to inform the Plan

Plans should set out the contributions expected from development ... such policies should not undermine the deliverability of the plan⁴.

The Council has provided evidence about the economic viability of development proposed in the Plan⁵. The Council's response to PQ32 includes an additional viability appraisal that takes account of all of the policy requirements in the submitted Plan⁶. This indicates that most housing development in the high value market areas defined on the map in Appendix 5 of the Plan is likely to be viable, whereas most housing development in other parts of the Borough is unlikely to be viable if all of the Plan's policy requirements are met.

The Council's response to PQ33 indicates that a total of 12,125 dwellings are expected to be built in the high value market areas and 3,794 in other parts of the Borough. Of those 3,794 dwellings outside the high value market areas, 3,141 had planning permission on 1 April 2019 and 653 would be on allocations that did not have planning permission on that date. Of those 653, some are now subject to a planning application or permission, and most of the others are on sites owned by the Council.

Q1.13. Is the Council's viability evidence proportionate and up to date having regard to relevant national policy and guidance⁷? Are the policy requirements set at a level such that the cumulative cost of all relevant policies will not undermine deliverability of the Plan?

4. The Whole Plan Viability Testing – Addendum (March 2020) continues to show that low value areas are unviable, and it shows that there are issues with medium value areas on brownfield sites. Whilst it is noted that a number of sites within the low value areas have planning permission and that some are Council owned, this does not remove the viability concerns. The HBF are concerned that these viability issues could limit the deliverability of the remaining sites and remove any flexibility in supply by way of windfall sites in these areas.

Developer contributions and viability assessments at planning application stage

The role for viability assessment is primarily at the plan making stage. Where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable. It is up to the applicant to

⁴ NPPF 34.

⁵ SDEB48.1, SDEB48.2, SDEB48.3, SDEB49 and section 8 of SDEB46.

⁶ Appendix PQ32.

⁷ PPG ID:10 (20190509).

demonstrate whether particular circumstances justify the need for a viability assessment at the application stage⁸.

Policy 66 sets out the Council's approach to seeking planning obligations to ensure that development is planned in step with, and makes appropriate contributions towards, necessary infrastructure, whilst ensuring that development viability is not put at risk. The Council has suggested a change to part A to include an additional criterion referring to pooled contributions to reflect a recent change to the Community Infrastructure Levy Regulations⁹.

Policy 67 sets out the circumstances in which the Council will support development proposals that are unable to make the full contribution through planning obligations (to meeting policy requirements in the Plan) due to viability issues.

Q1.14. Is policy 66 justified and consistent with national policy and guidance relating to the use of planning obligations¹⁰? Is the Council's suggested change necessary to make the Plan sound?

5. The HBF do not wish to comment on this question at this time.

Q1.15. Is policy 67 consistent with national policy and guidance relating to the use of viability assessments at the planning application stage¹¹?

6. Policy 67 is not considered to be consistent with national policy, the HBF do not consider that it will support the Government's objective of significantly boosting the supply of homes.

7. The HBF considers that there may be some circumstances where this policy and the use of trigger points can be utilised to bring forward the delivery of homes, and where used appropriately and agreed with the applicant can be a useful tool. However, the HBF have concerns around the implementation of this policy and how frequently it will be used. The use of trigger points could add further burdens to any developer who will need to reproduce viability assessments at a potentially regular basis, going against Government initiatives which are looking to reduce the need for viability assessments. The HBF considers that this policy causes unnecessary uncertainty and additional risk for developers, and that such disincentivising of developers could become an impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long time periods.

⁸ PPG ID:10-002- and 007-20190509.

⁹ CSD5.

¹⁰ PPG ID:23b (20190901).

¹¹ PPG ID:10 (20190509).

Matter 2. Quantity of Development needed in the Borough

Housing requirement for the Plan period 2015 to 2035

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. Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need can be met over the plan period¹².

Policy 3 in the Plan sets out a strategic aim to facilitate the delivery of 18,400 new homes in the period 2015 to 2035 (920 per year). Paragraph 4.38 advises that the Plan takes as its minimum starting point a local housing need of 585 homes per year based on the Government's standard method. However, it goes on to state that an additional 327 homes per year are needed to meet planned economic growth meaning that the objectively assessed need for housing is 912 homes per year (net). The Council's main evidence is set out in Economic Forecasts and Housing Needs Assessment (June 2018)¹³.

The Council's response to PQ21 advises that the housing requirement for the plan period (2015-2035) is a range: 11,700 (20 x 585) to 18,400 (20 x 920) dwellings¹⁴.

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

1. Policy 3 states that the 'Local Plan's strategic aim is to facilitate the delivery of 18,400 new homes in the period 2015-2035 (920 per annum)'. This is then slightly confused by the policy going on to consider the supply of land and what is required once completions have been deducted, and by discussing how the 5yr housing land supply will be calculated in relation the Local Housing Need (LHN) as derived from the Standard Methodology. The bullet point finishes stating 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 dwellings per annum*'.
2. The HBF consider that the clarity of this policy could be improved. Firstly, the HBF do not consider that a range is appropriate it suggests that the top figure would be a maximum and could limit development of homes. The HBF do not consider that this is line with national policy which looks to support the Government's objective of significantly boosting the supply of homes. It is also not in line with paragraph 60 of the NPPF which states that '*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*

¹² NPPF 60 and 65.

¹³ SDEB44.

¹⁴ The Council's response to PQ23 states that the intention is to avoid setting an actual figure for the bottom of the range in the plan/policy itself but rather that would vary throughout the Plan period reflecting the latest inputs to the Government's standard methodology for calculating local housing need. This is considered as part of matter 5 under the five year requirement.

circumstances justify an alternative approach which also reflects current and future demographic trends and market signals’.

3. The Council have identified a local housing need (LHN) of 585 dwellings per annum (dpa), they identify this as being the LHN as calculated in early 2018. The HBF have considered the LHN using the Standard Methodology set out in PPG, using the most up to date information it can be calculated as follows:

Step 1 - Setting the baseline:

2014-based household projections in England average annual household growth over a 10-year period, with the current year being used as the starting point.

The household projection for 2020 is 131,913 and in 2030 it is 137,085, therefore the growth equals 5,172, giving an average of 517.2 dwellings each year.

Step 2 - An adjustment to take account of affordability:

The most recent median workplace-based affordability ratio for Doncaster (2019) is 4.89.

Where an adjustment is to be made, the formula is:

$$\text{Adjustment factor} = \left(\frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

For Doncaster this would be: Adjustment Factor = $\left(\frac{(4.89 - 4)}{4} \right) \times 0.25 + 1 = 1.055625$

Minimum annual local housing need figure = (adjustment factor) x projected household growth

For Doncaster this would be: Minimum annual local housing need figure = $1.055625 \times 517.2 = 546\text{dpa}$.

Step 3 - Capping the level of any increase

The Doncaster Core Strategy was adopted more than 5 years ago, therefore the local housing need figure is capped at 40% above whichever is the higher of: the projected household growth for the area over the 10 year period identified in step 1; or the average annual housing requirement figure set out in the most recently adopted strategic policies.

The Doncaster Core Strategy has a housing requirement of 1,230 new homes each year 2011-2028, 40% above 1,230 would be 1,772dpa. The capped figure is greater than the minimum annual local housing need figure and therefore does not limit the increase to the local authority’s minimum annual housing need figure.

4. It should be noted that the Standard Method identifies a minimum annual housing need figure, it does not produce a housing requirement figure. It should also be noted that the Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The Standard Method provides a minimum starting point, and there may be circumstances where it is appropriate to consider whether the actual housing need is higher than the Standard Method

indicates. PPG (ID: 2a-010) goes on to state that these circumstances can include growth strategies for the area; strategic infrastructure improvements; previous levels of delivery; or where previous assessments of need are significantly greater than the outcome from the Standard Method.

5. Doncaster undertook a Housing Needs Survey in 2015, which was updated in 2016, this identified an objectively assessed need (OAN) of 920 homes each year to allow for Doncaster's economic growth. This OAN calculation considered jobs growth and an assessment of market signals.
6. The Peter Brett Economic Forecasts and Housing Needs Assessment 2018 identifies a demographic starting point from the 2014-based household projections of 562dpa, which if adjusted to match a business as usual job forecast would equate to 579dpa. However, to match the jobs growth aspiration of the Sheffield City Region it identifies a jobs-led housing need of 1,073dpa. Therefore, it is clearly apparent that there are circumstances identified that would require a housing figure significantly greater than the outcome of the Standard Method.
7. It is also noted that the 2018-based household projections are now available, and as a comparison, between 2020 and 2030 the 2014-based projections show an increase of 5,172 whilst the 2018-based projections show an increase of 9,622.
8. Planning for the Future (March 2020) states that the Government is reviewing the formula for calculating Local Housing Need and is looking to introduce a new approach which encourages greater building and makes sure the country is planning for the delivery of 300,000 new homes a year. Since the submission of the Doncaster Local Plan it is noted that the Government have published for consultation on Changes to Planning Policy and Regulations, this includes a new method for calculating the LHN. The new method is considered to align with Government's aspirations for the housing market, provide stability and certainty for all stakeholders and address the issues with the current approach. The HBF note that this new method for calculating the LHN would see a significant increase to the LHN for Doncaster, the HBF calculate the new LHN for to be 961dpa¹⁵. This significant increase is likely to have implications for how quickly the plan will need to be reviewed particularly if the plan does not identify an appropriate housing requirement or insufficient sites have been allocated to create flexibility in supply.
9. The Council identify that the housing requirement will be expressed as a range with the bottom of the range being the LHN and the top of the range being the 920dpa. As set out above the HBF do not consider that the LHN produced from the Standard Method would provide an appropriate housing requirement, it is evident that the actual housing requirement should be higher. The HBF also consider that using the LHN without it being defined and therefore subject to change each time new data is

¹⁵ Proposed new Standard Method: Existing Stock = 137,784, 0.5% of Existing Stock = 688.92, 2018-based household projections – 2020 = 132,311, 2030 = 141,100, average = 879, Ratio of median house price – 2009 = 4.74, 2019 = 4.89, Adjustment Factor = 1.0931, New LHN = 960.75dpa

available does little to provide clarity and would not be consistent with paragraph 16 of the NPPF which states that plans should '*contain policies that are clearly written and unambiguous*'.

10. The HBF consider that a clear housing requirement should be set, using the standard method as a starting point and taking account of the need for a higher figure based on the evidence provided by the Council. This figure should be identified as a minimum net figure, the HBF consider this would add clarity to the policy. The HBF considers that it would be appropriate for the policy to identify that the 18,400 new homes in the period 2015 to 2035 is a minimum requirement and a net figure not just an aim or the top end of the housing requirement range. The HBF consider that reference to the supply in relation to the remaining requirement should be moved to the justification or a table rather than included in this element of the policy. The HBF also consider that reference to the LHN should be moved to the justification, where it should be recognised as the starting point in calculating the housing requirement and the minimum requirement.

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)?

11. As set out above the HBF do not consider that setting the housing requirement as a range is consistent with national policy, and do not consider that it is otherwise justified.

The Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. Such circumstances could include where:

- *there are growth strategies that are likely to be deliverable (for example where funding is in place to promote and facilitate additional growth); or*
- *previous levels of housing delivery are significantly greater than the outcome from the standard method¹⁶.*

The Economic Forecasts and Housing Needs Assessment (June 2018) used the emerging targets in the Sheffield City Region's update to its Strategic Economic Plan as the basis for a policy-led growth scenario. Assumptions were made about economic activity rates, unemployment, double-jobbing and commuting to calculate the additional population that would need to live in the Borough to meet an increase in job demand of around 1,565 (1%) per year. This was then converted into a need for a total of 1,073 net additional homes per

¹⁶ PPG ID:2a-010-2019-0220.

year between 2015 and 2032, or 912 per year between 2016 and 2026 (the assessment period used in the standard method)¹⁷.

Figure 16 in the Housing Topic Paper¹⁸ indicates an average of 658 net additional homes in the Borough each year between 2004 and 2018. The Council's response to PQ20 advises that census data indicate an average of 766 net additional dwellings between 2001 and 2011, and that if its own completions data are used to cover the period from 2011 to 2018 together this shows an average of 778 between 2001 and 2018.

An increase in the total housing figures included in the Plan should be considered where it could help deliver the required number of affordable homes¹⁹.

Paragraph 6.9 of the Plan states that there is a need for an additional 209 affordable homes per year over and above the Council's own build programmes. The Council's response to PQ34 advises that a total of 3,461 affordable homes could be delivered between 2015 and 2035 (average 173 per year) taking account of completions up to 2019, commitments, and allocations in the context of policy 8. Additional affordable homes are also likely to be provided with funding from the Council's own delivery programme, commuted sums from some smaller sites, and clawback arrangements in some planning obligations.

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?

12. The HBF considers that it is appropriate to plan for a higher figure than the standard method indicates. PPG²⁰ states that 'the government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth'. The PPG is also clear that the standard method is the starting point. Therefore, the HBF consider that Doncaster should be supported in looking to provide a higher housing figure.

¹⁷ SDEB44 paragraphs 2.19-2.40 and 4.29-4.31.

¹⁸ DMBC4.

¹⁹ PPG ID:2a-024-2019-0220.

²⁰ PPG ID: 2a-010-20190220

13. The PPG²¹ also highlights that there can be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. These circumstances include where there are growth strategies; strategic infrastructure improvements; or where previous levels of housing delivery or previous assessments of need are significantly greater than the outcome from the standard method. The HBF considers that these circumstances exist in Doncaster and support the use of higher figure.
14. The Economic Forecasts and Housing Needs Assessment (June 2018) identified a need for a total of 1,073 net additional homes per year between 2015 and 2032, or 912 per year between 2016 and 2026. Both of these figures are clearly significantly higher than that provided by the standard methodology.
15. Economic Forecasts and Housing Needs Assessment (June 2018) sets out the sectors where growth is expected this include manufacturing, civil engineering, retail, education and most significantly transport and distribution. The economic growth assumptions are considered to be deliverable with schemes such as the iPort Logistics Park and Doncaster Sheffield Airport contributing significantly to their delivery.
16. The previous levels of delivery are shown in table 1 below. It shows that over the last ten years Doncaster have delivered an average of 829 homes each year, and over the last five years have delivered more than 1,100²² homes each year. The HBF consider that this is significantly above the figure provided by the standard methodology, and supports the need for a higher housing requirement.

Doncaster	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	Total	Average
Net Additional Dwellings	506	817	457	316	654	792	1,162	1,049	1,208	1,327	8,288	829
Affordable Completions²³	32	118	183	75	106	296	156	184	201	220	1,571	157

17. The Housing Needs Study 2019 identifies a net annual imbalance of 209 affordable dwellings each year. However, this assumes that the backlog is addressed over a 10-year period, if the need were to be met over the next 5-years the affordable housing need increases to 509 affordable dwellings each year for the first five years. Policy 8 requires housing sites of 15 or more homes (0.5ha or above) will normally be expected to include 23% affordable homes in the high value housing market areas or 15% elsewhere. If the housing requirement was reduced to 585dpa, it is evident that the affordable housing need would not be met. Even at 920dpa the affordable housing requirement would be difficult to achieve, the Housing Topic Paper identifies the

²¹ PPG ID: 2a-010-20190220

²² Average of 1,108dpa

²³ Table 1011: additional affordable housing supply, detailed breakdown by local authority
<https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply>

affordable housing require of 209dpa as 23% of the 920dpa, however, this target only applies to developments of over 15 homes and to those in the high value areas. Table 1 above shows that over the last 10 years the Council have delivered 1,571 affordable homes at an average of 157dpa, this is with a higher housing requirement of 1,230dpa over much of the period²⁴. The HBF consider that a higher housing requirement should be provided in order to help support the delivery of affordable homes.

²⁴ Policy CS10 of the adopted Core Strategy looks to deliver a net addition of 1,230 new homes each year, 20,910 in total over the period 2011 to 2028.

Matter 5. Housing Supply

Site selection methodology

Q5.1. Was the approach to determining which sites to include as housing allocations in the Plan described in the Site Selection Methodology and Results Report²⁵ justified and consistent with national policy and guidance²⁶?

1. The HBF do not wish to comment on this question, at this time.

Overall supply for the Plan period 2015 to 2035

Table 5 in the Plan summarises the housing land supply. The Council's Schedule of Minor Typographical and Cartographical Amendments²⁷ suggests some changes to the figures. Based on those amendments, the supply for the Plan period 2015 to 2035 identified in Table 5 is as follows:

Net completions 2015 to 2018	3,400
Expected completions on allocations with planning permission at 2018 (Tables H1 A-O in Chapter 16 of the Plan)	9,289
Expected completions on other commitments at 2018 not allocated in the Plan (small sites and in Defined Villages)	585
Expected completions on allocations without planning permission (Tables H2 A-Q in Chapter 16 of the Plan)	6,630
Total 2015 to 2035	19,904

Paragraph 4.77 in the Plan refers to some of the supply being capped. The Council's response to PQ28 clarifies that the notion of capping was used to inform the distribution of allocations across the Borough and that there are no policies in the Plan that would prevent any of the supply being delivered during the Plan period.

The Council's responses to PQ26 and PQ27 identify further sources of supply during the Plan period:

Windfalls (200 per year 2018-2035) ²⁸	3,400
Windfalls at Defined Villages (policies 2 and 3)	290
Windfalls on sites identified in the brownfield register 2019	197
Total windfalls	3,887

In total, the above would represent a supply of 23,791 dwellings between 2015 and 2035²⁹. This compares to the strategic aim set out in policy 3 of delivering 18,400 new homes in that period.

²⁵ SDEB46.

²⁶ NPPF section 5 and PPG ID:3 and ID:68.

²⁷ CSD6.

²⁸ Paragraph 4.83 of the Plan refers to windfalls averaging 419 per year 1999-2011 and 494 per year 2011-2015. The Council's response to PQ26 refers to an anticipated supply of around 200 windfalls per year 2018-2035.

²⁹ 19,904 + 3,887 = 23,791.

In addition, a total of 2,292 new homes are expected to be built on a number of allocations after 2035 due to the delivery trajectory for those particular large sites. However, there are no policies in the Plan that would prevent those being completed before 2035.

Policy 7 proposes the development of 280 new homes at Doncaster Sheffield Airport on allocated site 940E2 and potentially a further 920 on site 940E3 dependent on job growth. Paragraph 5.4 of the Plan states that the airport is an economic priority both for Doncaster and Sheffield City Region and it will play a key role in driving the local and regional economy. The strategic aim of delivering 18,400 new homes is in part to accommodate additional household growth to meet the Council and City Region's growth ambitions³⁰. Despite this, paragraph 4.78 advises that none of these 1,200 dwellings are accounted for in the housing land supply and the Council's response to PQ27 confirms that any completions on the allocated sites at the airport would not be counted towards achieving the aim of delivering 18,400 new homes.

"Reserve sites" identified in the Plan have potential capacity to accommodate 1,438 new homes. However, paragraph 4.82 of the Plan states that, due to HS2 and flood risk, there is doubt about whether they could be developed in the Plan period meaning that they have not been factored into housing supply.

Q5.2. Assuming it is modified to include the figures in CSD6, does the Plan identify sufficient land to ensure that the strategic aim of delivering 18,400 new homes in the Plan period 2015 to 2035 can be achieved? In particular, is there a reasonable prospect of:

- a) 9,289 new homes being built on allocations with planning permission at 2018?**
 - b) 585 new homes being built on other commitments at 2018?**
 - c) 6,630 new homes being built on allocations without planning permission at 2018?**
2. The HBF do not wish to comment on this question, at this time.

Q5.3. Should Table 5 of the Plan be modified to include the following, having regard to policies 2, 3 and 11 relating to development on unallocated sites and policy 7 relating to Doncaster Sheffield Airport:

- a) a windfall allowance of 3,400 new homes, or some other figure?**
- b) 290 windfalls at Defined Villages?**
- c) 197 new homes on windfalls on sites identified in the brownfield register 2019?**
- d) New homes at Doncaster Sheffield Airport?**

Should any such housing completions count towards achieving the aim of delivering 18,400 new homes in the Plan period?

3. Due to the uncertainty around the developability of these sites, the HBF support the Council in not including them within the supply. If these sites do come forward, they can be considered to add flexibility and choice to the supply.

Q5.4. To be effective, should Table 5 of the Plan and/or other parts of the reasoned justification for policy 6 be modified to set out explicitly what the total housing supply is for the Plan period 2015 to 2035?

³⁰ Paragraphs 4.37 and 4.38 of the Plan and SDEB44 paragraph 2.20 to 2.40.

4. It may add clarity to the policy if further information is provided to set out the total housing supply for the plan period.

Small and medium sized sites

NPPF 68 requires local planning authorities to identify through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare (unless it can be shown that there are strong reasons why this 10% target cannot be achieved). Paragraph 4.81 of the Plan indicates that 8% of the requirement may be met on such sites. However, the Council's response to PQ31 advises that further sites have been identified in the brownfield register 2019, meaning that now there are opportunities to build a total of 2,320 dwellings on small and medium sized sites. This represents nearly 13% of the requirement for 18,400 over the Plan period.

Q5.5. Will the Plan be effective in helping to ensure that at least 10% of the housing requirement is met on sites no larger than one hectare? Is it necessary to modify paragraph 4.81 of the Plan as set out in the Council's response to PQ31?

5. The HBF consider that it is important that the Council provide an appropriate range and variety of sites to support the delivery of homes, it is important that this includes at least 10% on sites no larger than 1ha. The HBF considers that the modified paragraph 4.81 is an improvement on the existing text, however, there would have been more certainty if these small sites had been included as allocations in the Plan.

Five year housing land requirement

National guidance advises that housing requirement figures in adopted strategic policies should be used for calculating the five year housing land supply figure. Where strategic policy-makers have successfully argued through plan-making and examination for a requirement set out as a range, the five year land supply will be measured against the lower end of the range³¹.

Policy 3 states that for the purposes of calculating five year housing land supply, the requirement will be based on the local housing need figure as derived from the standard method reviewed and revised through the plan period in line with the latest household projections and affordability ratio.

The Council's response to PQ23 suggests that the use of a fixed figure as the bottom of the range would mean that the Plan would date very quickly which they consider would be unhelpful. The Council also considers that the Government's standard method for calculating local housing need may change, and that variable figures are a common feature of the planning system.

The Council's response to PQ21 states that the housing requirement for the Plan period is the range 11,700 (20 x 585) to 18,400 (20 x 920). If the five year requirement were based on

³¹ PPG ID:68-005 and 027-20190722.

the bottom of that range and no account were taken of completions since 2015 it would be 3,218 dwellings³². This includes a 10% buffer as required by national policy³³.

The Council's response to PQ25 states that the five year requirement on 1 April 2019 would be 3,042 dwellings if it were calculated as proposed in policy 3 ie based on the latest local housing need figure under the standard method³⁴. If it were based on 920 dwellings per year and it took account of completions since 2015, the five year requirement would be 4,703 dwellings³⁵. If it were based on 920 dwellings per year and it took no account of completions since 2015, the five-year requirement would be 5,060 dwellings³⁶.

Q5.6. Is the proposal in policy 3 to have a variable figure for the five year requirement consistent with national policy? Would it be effective in helping to ensure that the need for homes identified in the Plan can be met? If not, how should the five year requirement be calculated?

6. The HBF do not consider that having a variable figure, or using just the figure from the standard methodology which is not considered to meet the full need, is particularly effective in helping to ensure that the need for homes can be met.
7. The NPPF³⁷ looks for local planning authorities to identify a minimum of five years' worth of housing against their **housing requirement set out in adopted strategic policies** or against their local housing need where the strategic policies are more than five years old. This appears to suggest that the housing requirement would be one number rather than a range and that it should be different to the local housing need.
8. The HBF consider that a clear housing requirement should be set, using the standard method as a starting point and taking account of the need for a higher figure based on the evidence provided by the Council. This figure should be identified as a minimum net figure, the HBF consider this would add clarity to the policy. This housing requirement figure would then be used to calculate the five-year housing land supply.
9. If the 920dpa were to be taken as the net minimum housing figure, the HBF considers that the five-year housing land requirement would be 5,060³⁸, including the 10% buffer.

Five-year housing land supply

The Council's Five-Year Deliverable Housing Land Supply Statement 2019-2024³⁹ identifies total capacity of 6,870 dwellings on sites considered to be deliverable on 1 April 2019. The Council's response to PQ29 advises that the figure should actually be 7,518 dwellings because the figure in SDEB27 was based on a typographical error. This includes a 10%

³² $585 \times 5 = 2,925$. $2,925 + 293 (10\%) = 3,218$.

³³ NPPF 73(b).

³⁴ $553 \times 5 = 2,765$. $2,765 + 277 (10\%) = 3,042$.

³⁵ $18,400 - 4,727 = 13,673$. $13,673 / 16 = 855$. $855 \times 5 = 4,275$. $4,275 + 428 (10\%) = 4,703$.

³⁶ $920 \times 5 = 4,600$. $4,600 + 460 (10\%) = 5,060$.

³⁷ Paragraph 73

³⁸ $920 \times 5 = 4,600$. 10% buffer = $4,600 \times 10\% = 460$. Five-year requirement = $4,600 + 460 = 5,060$

³⁹ SDEB27.

non-delivery allowance / lapse rate for all sites with or without planning permission (other than those under construction).

The Council's response to PQ29 breaks down the total five year supply of 7,518 dwellings on 1 April 2019 into five categories consistent with those referred to in the NPPF definition of "deliverable" and windfalls:

<i>A. Sites of <10 dwellings with outline or full planning permission</i>	<i>707</i>
<i>B. Sites of 10 or more dwellings with detailed planning permission</i>	<i>2,978</i>
<i>C. Sites of 10 or more dwellings with outline planning permission (8 sites)</i>	<i>1,183</i>
<i>D. Sites with a grant of planning permission in principle (8 sites)</i>	<i>119</i>
<i>E. Allocations without planning permission (27 sites)</i>	<i>1,531</i>
<i>F. Windfalls</i>	<i>1,000</i>
<i>Total</i>	<i>7,518</i>

National policy advises that sites in categories A and B (total 3,685 dwellings) should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

Q5.7. Is there clear evidence that any of the 3,685 dwellings on sites with planning permission in categories A and B on 1 April 2019 will not be completed by 31 March 2024?

10. The HBF do not wish to comment on this question, at this time.

The Council's response to PQ30 summarises its evidence for the assumptions about the number of dwellings expected to be delivered within five years on each of the sites that fall into the other categories C, D and E (total 2,833 dwellings). The full evidence is set out in the Five Year Deliverable Housing Land Supply Statement 2019-2024; Housing & Economic Land Availability Assessment 2018; and Topic Paper 4: Housing⁴⁰.

Q5.8. Has the Council provided clear evidence that a total of 2,833 dwellings will be completed on sites of 10 or more dwellings with outline planning permission, sites with a grant of planning permission in principle, and allocations without planning permission by 31 March 2024?

11. The HBF does not wish to comment on any of the individual sites, however, the PPG provides clear examples of the types of evidence that may be used to demonstrate deliverability these include:

- How much progress has been made towards approving reserved matters, and whether these link to a planning performance agreement (PPA) that sets out the timescales for approval of reserved matters and discharge of conditions;
- Firm progress towards the submission of an application;
- A written agreement which confirms the developers' delivery intentions and anticipated start and build-out rates;
- Firm progress with site assessment work;

⁴⁰ SDEB27; SDEB45; and DMBC4.

- Clear information about site viability, ownership constraints, infrastructure provision.

Q5.9. Is the inclusion of a windfall allowance of 1,000 dwellings in the five year supply from 1 April 2019 justified? Would there be “double counting” with some of the 4,886 dwellings on sites with full or outline planning permission on 1 April 2019?

12. The HBF do not support the inclusion of a windfall allowance with the five-year supply. The NPPF⁴¹ and the PPG⁴² are both clear that the 5-year land supply is a supply of **specific deliverable** sites. The use of ‘specific’ suggests that the sites should be clearly defined or identified, this does not appear to sit comfortably with the inclusion of windfall development. It is also not clear what evidence the Council can provide to demonstrate the deliverability of these windfall sites, given by their nature they are unidentified at this point.
13. If a windfall allowance were to be included, the HBF do not consider it would be appropriate to be included in the first three years of the supply, where it is likely to overlap with sites already identified with permissions. It will also be important that the Council provide appropriate compelling evidence as required by the NPPF⁴³ and PPG⁴⁴, including historic windfall delivery and expected future trends.

Housing trajectory

Strategic policies in local plans should include a trajectory illustrating the expected rate of housing delivery over the plan period⁴⁵.

Q5.10. Does Figure 3 in the Plan set out a justified and effective housing trajectory?

14. The HBF do not wish to comment on this question, at this time.

Q5.11. Does the trajectory demonstrate that the Plan will be effective in ensuring that there will be a supply of specific deliverable sites sufficient to meet an appropriately calculated five-year requirement when the Plan is adopted and thereafter?

15. Assuming that the homes are delivered at the rates suggested by the trajectory it is not clear how the Council will ensure that they have a rolling five-year housing land supply especially in the later years of the Plan. It is assumed that the Council will monitor this and ensure that an appropriate action is set as part of the monitoring framework and as part of their 5-year review process, to make sure that further sites are brought forward if needed.

Policy 2 part 5: if a five-year supply cannot be demonstrated

Policy 2 part 5 states that, if a five year borough-wide supply of housing land cannot be demonstrated, residential development will be allowed in the Countryside if adjacent to a

⁴¹ NPPF Paragraph 67

⁴² PPG ID: 68-002-20190722

⁴³ NPPF Paragraph 70

⁴⁴ PPG ID: 3-023-20190722

⁴⁵ NPPF 73.

Development Limit of a settlement in levels 1-3 of the hierarchy provided that a number of criteria are met.

Q5.12. Is the approach set out in policy 2 part 5 to allowing development adjacent to the Development Limits of the Main Urban Area, Main Towns, and Service Towns and Villages if a five year borough-wide supply of housing land cannot be demonstrated justified and consistent with national policy?

16. The HBF do not wish to comment on this question, at this time.

Matter 6. Housing Development Requirements

Site specific requirements for housing allocations without planning permission

Policy 6 states that the housing allocations without planning permission listed in Tables H2(A-Q) will be developed in accordance with the specified developer requirements set out in Appendix 2. The Council has suggested changes to include an additional requirement relating to heritage assets for site ref 133 (Thorne) and to the boundary of site ref 247 (Rossington colliery).

The requirements relating to the eight housing allocations removed from the Green Belt were considered under matter 4.

Q6.1. Are the development requirements for the housing allocations without planning permission set out in Appendix 2 to the Plan justified? Is there sufficient detail to provide clarity to developers, local communities and other interested parties about the nature and scale of development proposed⁴⁶? Are the Council's suggested changes to Appendix 2 relating to sites ref 133 (Thorne) and 247 (Rossington) necessary to make the Plan sound?

17. The HBF do not wish to comment on this question, at this time.

Housing mix

Q6.2. Is the requirement in policy 8 part A for development to deliver a mix of house size, type, price and tenure to address the needs and market demand in the latest Housing Need Assessment or other robust evidence justified?

18. The HBF understands the need for a mix of house size, type, price and tenure and is generally supportive of providing a range and choice of homes to meet the needs and market demand in the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements or the need to provide significant amounts of additional evidence.

19. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location. The HBF would also highlight the need for creating a housing market that will attract investors to Doncaster, and to provide an element of aspiration to ensure working people and families are retained within the area. The HBF consider that the Council need to be aware that the latest Housing Need Assessment will only ever identify current deficits and reflects a snap-shot in time. Therefore, even the latest HNA may not reflect the position at the time of an application. The HBF would like to ensure greater flexibility within this policy to acknowledge that the mix can vary both geographically and over the plan period.

⁴⁶ PPG ID:61-002-20190315

The reasoned justification to policy 8 refers to Appendix 4. Appendix 4 provides an indicative breakdown of the number of new affordable and market homes of different types (houses, bungalows and flats) and size (bedrooms) in different settlements based on the Council's Housing Needs Survey 2019.

Q6.3. Is the inclusion of Appendix 4 in the Plan justified and consistent with the wording of policy 8? Will it be effective in helping to ensure that the need for different types of homes in different parts of the Borough are met throughout the Plan period?

20. The HBF are concerned at how quickly the information provided in Appendix 4 will date, and whilst it may provide a useful starting point, the HBF are concerned at how it may be used in practice. The points raised in relation to the HBF response to Q6.2 also apply in relation to the use of Appendix 4.

Affordable housing

Paragraph 6.9 of the Plan states that there is an identified need for an additional 209 affordable homes per year over and above the Council's own build programmes. Paragraph 6.10 makes it clear that the affordable housing requirements of policy 8 part B take account of economic viability as well as housing need. The Council's response to PQ34 advises that those requirements could deliver around 3,461 affordable homes between 2015 and 2035 (173 per year).

The Council's viability assessments⁴⁷ make a number of specific assumptions about affordable housing developments including about developer profits, tenure mix and development values.

Q6.4. Are the requirements of policy 8 part B for housing sites of 15 or more homes (or 0.5 hectares or above) to normally include 23% affordable homes in high value housing market areas or 15% elsewhere justified by adequate, proportionate and up to date evidence about need and viability?

21. The HBF does not dispute the need for affordable housing within Doncaster and indeed supports the need to address the affordable housing requirements of the borough. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability. The NPPF⁴⁸ established the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened.

22. The Whole Plan Viability Testing (2019) report shows the issues of viability for a number of sites. It shows that schemes in the low value areas are not viable and will not be able to support the affordable housing requirement, they continue to be unviable even when the density is increased to 40 dwellings per net ha. The HBF are concerned that the affordable housing requirement along with the other requirements in the policy, may actually lead to further sites being found to be unviable. The Council should be mindful that it is unrealistic to negotiate every site on a one by one basis because the base-line aspiration of a policy or combination of policies is set too high

⁴⁷ SDEB48.1 and Appendix PQ32.

⁴⁸ NPPF Paragraph 34

as this will jeopardise future housing delivery. Therefore, site by site negotiations on these sites should occur occasionally rather than routinely.

Q6.5. Is the reference in paragraph 6.9 to 75% of the affordable homes being for rent and 25% for low cost home ownership justified? Is it consistent with the national policy expectation that 10% of homes on major sites should be available for affordable home ownership⁴⁹? If the 75%/25% split is justified and consistent with national policy, should it be referred to in policy 8 rather than the reasoned justification?

23. The Housing Needs Study (2019)⁵⁰ recommends that the affordable tenure split for the borough is 75% social/affordable rented and 25% intermediate tenure, based on the tenure split preferences from the 2018 Household Survey. It suggests that 82% of existing households in need and 79.5% of newly forming households could afford intermediate tenure based on a 50% shared ownership property. The Whole Plan Viability Testing Report (2019)⁵¹ states that it has tested viability based on a tenure split of 75:25 between affordable rent and affordable home ownership. It goes on to state that it is considered appropriate to test different mixes of affordable housing (between affordable rented and ownership tenures) to see the impact this can have on scheme viability.
24. The NPPF⁵² states that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership. This suggests that if 100 homes were to be built, based on this policy 10 of those homes should be available for affordable home ownership. Based on Policy 8 and paragraph 6.9 of the Doncaster Local Plan:
- In high value areas 23% of homes should be affordable, of which 25% should be for low cost home ownership, therefore if 100 homes were to be built 23 of them would be affordable and 6 (rounded from 5.75) of those would be low cost home ownership; or
 - In other areas 15% of homes should be affordable, of which 25% should be for low cost home ownership, therefore if 100 homes were to be built 15 of them would be affordable and 4 (rounded from 3.75) of those would be low cost home ownership.
- This is significantly less than is required by the NPPF policy. Therefore, the HBF do not consider that the policy and justification are consistent with national policy. The tenure split set out in the justification should be deleted, and instead reference could be made to the requirements of the NPPF for 10% of homes to be for affordable home ownership.

Internal space standards

The Council's Housing Design Standards Policy Evidence Paper 2019⁵³ section 3 sets out the main evidence for the requirement in policy 46 part A for all new housing to meet the

⁴⁹ NPPF 64.

⁵⁰ Housing Needs Study (2019) paragraph 5.28

⁵¹ Whole Plan Viability Testing (2019) paragraph 5.15.1

⁵² NPPF paragraph 64

⁵³ SDEB25.

Nationally Described Space Standard as a minimum. This includes a finding that the majority of recently built homes in the Borough failed to meet those standards in terms of bedroom sizes and storage space.

The Council's viability assessments⁵⁴ assume dwelling sizes consistent with the space standards.

Q6.6. Is the requirement in policy 46 part A for all new housing to meet the Nationally Described Space Standard as a minimum justified by adequate, proportionate and up to date evidence about need, viability and timing⁵⁵?

25. This policy looks for all new housing to meet national spaces standards as a minimum. However, these enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis.
26. PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:
- **Need** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.
 - **Viability** – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
 - **Timing** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'.
27. The Housing Design Standards Policy Evidence Paper (June 2019) surveyed 246 homes across 47 sites, to determine how many met the NDSS. It is not apparent if these sites had been submitted after the Government introduction of the NDSS, but it seems unlikely that it would have been in place at the time many of the applications were submitted. The Council indicate that through their research they have identified that a number of properties have not been built to the NDSS. They state that '201 out of the 246 plans assessed met the gross internal floor area based on their proposed number of bedrooms' and that 'plans were more likely to fail against the NDSS based on storage space or bedroom size, highlighting an internal design issue as opposed to dwelling plot size'. The Council also suggest that the NDSS would be beneficial in providing ventilation, reducing under-occupancy and over-crowding. However, the evidence provided is limited in terms of numbers of properties considered and the

⁵⁴ SDEB48.1 and Appendix PQ32.

⁵⁵ PPG ID:56-020-20150327.

potential market comparisons made. It is not evident from the information provided what 'need' there actually is for properties built to the standards there is no evidence that these smaller properties are not selling, there is no evidence provided that customers are not satisfied with these properties or that these properties are not comparable to other properties available in the market area. The HBF consider that if the Government had just expected all properties to be built to NDSS that they would have made these standards mandatory not optional.

28. The HBF consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The industry knows its customers and what they want, our members would not sell homes below the enhanced standard size if they did not appeal to the market.
29. It should be noted that the HBF Annual Industry Customer Satisfaction Survey⁵⁶ published March 2020 and completed by 63,418 new homeowners highlights that 91% of people who have bought a new home would do so again. It also highlights that 93% of homeowners are satisfied with the internal design and layout of their new home. This does not suggest that new homeowners have issues with the size of rooms provided or that there is a need for the NDSS to be introduced.

Housing for older people and people with disabilities

The Council's Housing Design Standards Policy Evidence Paper 2019⁵⁷ section 2 sets out the main evidence for the requirements in policy 46 parts B and C relating to accessible and adaptable dwellings [M4(2)] and wheelchair adaptable dwellings [M4(3)].

The Council's response to PQ35 advises that the number of households with over 65 year olds or people with long term health problems or disabilities is expected to increase by 11,925 over the Plan period. The Council estimate that policy 46 part B could deliver a total of 6,291 accessible and adaptable homes and part C a total of 484 wheelchair adaptable homes.

The Council's viability assessments⁵⁸ assume an additional cost of £1,500 per dwelling to meet the M4(2) standard and an additional cost of £12,500 per dwelling to meet M4(3).

Q6.7. Is the requirement in policy 8 part C for developers to demonstrate how the provision of housing types suitable for older people can be increased, especially bungalows, extra care facilities and supported living accommodation, justified?

30. The HBF are concerned by the requirement in Policy 8 (D) which states that developments must demonstrate how provision of housing types suitable for older

⁵⁶ <https://www.hbf.co.uk/policy/policy-and-wider-work-program/customer-satisfaction-survey/latest-results/>

⁵⁷ SDEB25.

⁵⁸ SDEB48.1 and Appendix PQ32.

people can be increased, especially bungalows, extra care facilities and supported living accommodation. Particularly when considered in relation to the following sentence which looks for these types of development to have good access to local services and facilities by means other than the private, which suggests that it will not be appropriate for all sites to provide these types of homes. Therefore, the HBF do not consider it is appropriate to require all sites to demonstrate how this provision will be increased, instead, the policy could encourage these types of developments on sites where it is appropriate.

31. The HBF consider that it would be more appropriate for the Council to provide a policy in line with the PPG⁵⁹ which looks for policies to set out how the Council will consider proposals for different types of housing that older people are likely to require. The policy should also give consideration to the diverse range of needs that exist, as the health and lifestyles of older people can differ greatly, as can their housing needs. The HBF suggest this type of policy could for example state that the Council will support the provision of a range of homes specifically provided for older people including bungalows, retirement homes, extra care facilities and supported living accommodation in appropriate locations.

Q6.8. Is the requirement in policy 46 part B for at least 65% of all new homes on developments of over 0.5 hectares or 10 or more units to meet Building Regulation standard M4(2) justified by adequate, proportionate and up to date evidence about need, viability and site specific factors such as vulnerability to flooding, site topography, and other circumstances⁶⁰?

32. The HBF is generally supportive of providing homes that are suitable to meet the needs of those with limiting long term illnesses or disabilities. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG.
33. PPG⁶¹ identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Doncaster which justifies the inclusion of optional higher standards for accessible / adaptable homes in its Local Plan policy. Evidence of an ageing population or those with a disability does not in itself justify the requirements of this policy, without appropriate evidence the HBF would not support the introduction of this policy.
34. It must be remembered that all new homes will be built to part M4(1). According to Part M of the Building Regulations meeting M4(1) will ensure reasonable provision for most people, including wheelchair users, to approach and enter the dwelling and to access

⁵⁹ PPG ID: 63-006-20190626

⁶⁰ PPG ID:63-009-20190626 and PPG ID:56-007-20150327 and 56-008-20160519.

⁶¹ PPG ID: 56-007-20150327

habitable rooms and sanitary facilities on the entrance storey. As such these standards are likely to be suitable for the majority of people.

35. The Housing Design Standards Policy Evidence Paper (June 2019) identifies that 18.78% of the population of Doncaster was over 65yrs in 2017 and that 24.83% will be by 2035. The HBF does not dispute the ageing population within Doncaster, however, it is not clear how this ageing population and potential future need reflects in the need for 65% of all new homes to be provided at M4(2) standards. If it had been the Government's intention that generic statements identifying an ageing population justified adoption of the accessible & adaptable homes standards, then the logical solution would have been to incorporate the M4(2) as mandatory via the Building Regulations which the Government has not done. The optional higher M4(2) standard should only be introduced on a "need to have" rather than a "nice to have" basis. The evidence does not demonstrate this need.
36. The Housing Design Standards Policy Evidence Paper (June 2019) also identified that older people and individuals with a long-term health problem or disability (LTHPD) would prefer to live in smaller, one or two bed- properties. It is not clear how this evidence has been considered in relation to the policy.
37. The Whole Plan Viability Testing (2019) report shows the issues of viability for a number of sites. It shows that schemes in the low value areas are not viable and will not be able to support the optional housing standards along with the cumulative requirements from other policies. The Whole Plan Viability Testing – Addendum (March 2020) continues to show that low value areas are unviable, and it shows that there are issues with medium value areas on brownfield sites. Therefore, the HBF has concerns in relation to the viability and deliverability of this policy, particularly alongside the cumulative impacts of other requirements of the plan.
38. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommend that an appropriate transition period is included within the policy. The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances which may make a specific site less suitable for M4(2) dwellings. The policy also needs to make it clear that where step-free access is not viable, the requirement for M4(2) should not be applied.

Q6.9. Is the requirement in policy 46 part C for at least 5% of all new homes on developments of over 0.5 hectares or 10 or more units to meet Building Regulation standard M4(3) justified by adequate, proportionate and up to date evidence about need, viability and site specific factors such as vulnerability to flooding, site topography, and other circumstances⁶²?

39. It is noted that the policy refers to M4(3) 'wheelchair adaptable dwellings' it is assumed that this relates to M4(3)(2a) homes as set out in the Building Regulations Part M. It would be beneficial if this could be clarified within the justification text.

⁶² PPG ID:63-009-20190626 and PPG ID:56-007-20150327 and 56-008-20160519.

40. The Housing Design Standards Policy Evidence Paper (June 2019) highlights that information about the need for housing for wheelchair users is difficult to obtain⁶³, and it is noted that much of the evidence provided is from national level information, such as the English Housing Survey. The HBF is concerned that national level information does not provide an evidenced case for Doncaster, it instead suggests that Government have made a decision that this information is insufficient to require a national requirement. The paper goes on to identify a need for 463-665 additional wheelchair adaptable dwellings over the plan period, it then goes on to assume, that this entire need should be met from the new housing provision. This does not seem appropriate, particularly given that a significant number of those surveyed and living in private homes have suggested that they do not wish to move. It is therefore likely that a significant proportion of this need will be met through conversion of existing homes. Therefore, whilst the paper goes on to suggest that the 463-665 represents 3.36-4.8% of the plan requirement, this is likely to be a significant over-estimation of the need to be provided from the new market housing stock. This suggests that the 5% requirement is not appropriate.
41. The HBF is also concerned that requiring the general provision of new homes built to the M4(3) standards will do little to meet the needs of people requiring these properties. There is no information to suggest that these people are looking to move home or that they are considering moving to locations where these new homes are to be built. There would also be no limitations on the sales of the properties, which means that they may never be occupied by someone requiring an adaptable property.
42. The Whole Plan Viability Testing (2019) report shows the issues of viability for a number of sites. It shows that schemes in the low value areas are not viable and will not be able to support the optional housing standards along with the cumulative requirements from other policies. The Whole Plan Viability Testing – Addendum (March 2020) continues to show that low value areas are unviable, and it shows that there are issues with medium value areas on brownfield sites. Therefore, the HBF has concerns in relation to the viability and deliverability of this policy, particularly alongside the cumulative impacts of other requirements of the plan.
43. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommend that an appropriate transition period is included within the policy. The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances which may make a specific site less suitable for M4(3) dwellings. The policy also needs to make it clear that where step-free access is not viable, the requirement for M4(3) should not be applied.

Design of housing developments

⁶³ Housing Design Standards Policy Evidence Paper (June 2019) Paragraph 2.72

Chapter 12 of the Plan contains various policies intended to provide a framework for the assessment of the design of development proposals, including for new homes. Policy 45 is specifically about residential design.

Q6.10. Are the requirements in policies 42 to 45 relating to the design of housing developments justified? In particular:

a) The approach to “standardised or off the shelf” designs in policy 42 part B.

b) The requirement in policy 43 for all major developments to make use of pre application engagement with the Council, Design Review and urban design tools including masterplans, design guides, and design codes.

c) The requirement in policy 45 part D for all major developments to utilise Building for Life throughout the design process.

d) The requirement in policy 42 part D for the provision of public art in all major urban extensions and high profile and prominent developments, particularly in the key priority areas listed and shown on the Policies Map.

e) The requirements in policy 44 part C relating to all edge of settlement developments.

23. The HBF note that reference to Building for Life is now dated, and new guidance is titled Building for a Healthy Life.