



# THE HOME BUILDERS FEDERATION

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**Sent by Email only**

Date: 5<sup>th</sup> September 2015

Dear Sir / Madam,

## **Doncaster Local Plan: Vision, Aims and Objectives**

1. Thank you for consulting with the Home Builders Federation (HBF) on the Doncaster Local Plan: Vision, Aims and Objectives consultation.
2. The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.
3. We would like to submit the following comments to the questions posed in the consultation document.

### **Q1: Vision and outcomes**

***a) Do you agree with the outcomes we are seeking to achieve? Do they provide clear direction to the Doncaster Local Plan? Do they reflect the overall vision set out in the Borough Strategy?***

4. The stated outcomes are generally positive and considered to reflect a strategy for economic growth and prosperity. The HBF support such ambitions. It is, however, important to ensure that these ambitions are closely aligned to housing delivery.

***b) Is there anything you think we have missed which should be included?***

5. The vision and outcomes do not make any reference to housing. Meeting the housing needs of the area is a key element of the plan, which will not only provide social benefits but is required if the Council is to meet its economic aspirations. The HBF therefore recommends reference be made to meeting the housing needs of current and future generations.

## **Q2: Aims and objectives**

### ***a) Do you agree with the proposed aims and objectives set out above? If not, what changes would you like to see?***

6. The HBF is generally supportive of the aims and objectives which set out a positive framework for the development of the local plan. Our comments upon specific aims and objectives are set out below;

- **Aim 1: Jobs and Growth** – the HBF is supportive of this aim, but would point out that housing development also provides significant economic benefits. Further information is provided within our response to question 3b below;
- **Aim 2: Regeneration and community pride** – the HBF consider that the re-use of previously developed land can perform an important role as part of a balanced portfolio of housing sites. The objective which seeks to encourage the re-use of such land is therefore supported providing this is not interpreted as prioritisation of such sites. The Government is currently considering various ways to encourage the re-use of previously developed land. Schemes such as the Starter Home Initiative, Local Development Orders, Local Authority Brownfield Land Registers and Housing Zones all promote and incentivise the re-use of previously developed land. The Council should seek to build upon such mechanisms to encourage the re-use of previously developed land alongside greenfield opportunities.
- **Aim 5: Energy and climate change** – in terms of energy efficiency and housing development the Council will need to be aware and take account of the implications of the Housing Standards Review.
- **Aim 7: Homes and communities** – the HBF is supportive of this aim and its associated objectives.

### ***b) Are they sufficiently distinctive and locally specific? Is there anything you think we have missed which should be included?***

7. The HBF has no further comments at this stage.

## **Q3: Portrait of the borough**

### ***a) Do you agree that section 2 provides an accurate reflection of the borough's economic, social and environmental context?***

8. Section two is considered to provide a reasonable reflection of the economic, social and environmental context of the borough. The main area of interest for the HBF is the 'Homes and Communities' section, our specific comments upon this part of the portrait are set out below.

9. The HBF is supportive of the reference to the housing supply not meeting the current needs of Doncaster's population. This will be a key issue for the plan to address. The HBF also agree that economic viability is undoubtedly an issue for housing delivery within Doncaster. Once again the plan will need to give careful consideration to how this is addressed, including the requirements and obligations which are placed upon housing development. Whilst economic viability is undoubtedly an issue the sentence within the 'Homes and Communities' section referring to the issue is considered unduly

negative and not reflective of the whole picture. It is considered that a more reflective sentence would read;

*'Doncaster has a large supply of housing land with planning permission but ~~private house builders view~~ some of this as land **is not currently unviable, or at least unable to deliver affordable housing and other community benefits**'. This has meant that the delivery of housing, together with the associated community benefits, including affordable housing, has not kept pace with local needs. The Council will need to work with the development industry to provide viable sites to ensure that housing delivery can be increased.'*

**b) Is there anything missing from the description of the Boroughs economic, social and environmental context that should be added?**

10. The 'Economy' or 'Homes and Communities' sections could usefully make reference to the wider social and economic benefits that new and increased levels of housing provision can bring. The HBF has recently undertaken a study upon the economic impact of house building entitled '*The economic footprint of UK house building*' this report can be accessed via our website at [www.hbf.co.uk](http://www.hbf.co.uk). This report will shortly be supplemented by a regional report which highlights the benefits provided to individual local authorities over the last year.

**Further information**

11. I trust that the Council find the foregoing comments useful as it continues to prepare its Local Plan. I would be happy to discuss these comments further if required. I would also like to be kept informed of future consultations upon the Local Plan or other planning documents.

Yours sincerely,

*MJ Good*

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