



THE HOME BUILDERS FEDERATION

Local Plans Team,
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Date: 4th September 2015

Dear Sir / Madam,

Doncaster Local Plan: Issues and Options

1. Thank you for consulting with the Home Builders Federation (HBF) on the Doncaster Local Plan: Issues and Options 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 selected questions posed in the consultation.

Q1 In general terms, where should new homes be provided in Doncaster?

4. The HBF does not consider that the options identified are mutually exclusive. Most, if not all, of the options have an element of merit. In this regard the HBF suggests that a combination of options may be utilised. In determining which combination is most appropriate the Council will need to have regard to the sustainability of individual settlements together with an appreciation of the prospects for delivery.
5. The chosen combination should still focus development upon the larger towns and villages, including the main urban area of Doncaster and its immediate surrounds. These areas provide the majority of services and jobs and hence are the most sustainable locations to develop. It is, however, important that the needs of the smaller towns and villages are not completely overlooked. New market housing may be required within smaller settlements not only to meet the needs of local residents but to enable them to remain vibrant centres.
6. Private developers will be tasked with delivering the majority of the new housing identified within the plan it is, therefore, important that the majority of the proposed housing is located in areas where the market can deliver. This will require close liaison with the industry, as different developers will seek different types of sites and locations.

Q2 Where, more specifically, should new homes be built?

7. The HBF does not wish to comment upon specific locations at this stage. It is, however, important that the Council ensures that whatever percentage split between settlements is identified this remains deliverable under current market conditions.

Q4 To what extent should land be taken out of the Green Belt to meet the borough's housing and employment needs?

8. The NPPF, paragraph 83, provides the Council with the opportunity to amend the Green Belt boundary through the local plan process where exceptional circumstances exist. The need to meet the housing needs of an area in a sustainable manner has been demonstrated to meet such criteria within numerous recent local plan examinations including Leeds, Gateshead and Newcastle as well Cheshire West and Chester.
9. The existing Green Belt boundary is a constraint upon western parts of the area. This area contains a number of key settlements and as such may provide sustainable locations for new development. The area is also closely linked to other key towns and cities within the Sheffield City Region including Rotherham and Sheffield. In determining whether, and potentially how much, development should take place a number of factors will need consideration, not least the demonstration of exceptional circumstances. The HBF does not feel able to make a definitive judgement upon this issue due to the limited information currently available. It is therefore recommended that prior to the next stage of consultation the Council consider the extent to which development can be accommodated outside of the Green Belt and whether this represents a sustainable pattern of development.
10. If it is determined that a review of the Green Belt should be undertaken it is important that the amended boundaries provide significant longevity. It is therefore recommended that identification of safeguarded land also be considered in order to ensure that the boundaries will not require further amendment at the end of the plan period. Any review must be done in a clear and systematic manner with all purposes of the Green Belt given full consideration. This will enable clear and transparent decision making upon the relative merits, or otherwise of individual Green Belt parcels. The Inspectors interim views upon the Cheshire East Local Plan (dated 12th November 2014) provide guidance upon this issue.

Q10 How should we best meet specialist housing needs?

11. The HBF is supportive of providing for the needs of older people and other specialist needs. The needs of such groups are not, however, homogeneous and as such a 'one size fits all' policy response would be inappropriate. In this regard the Council should consider flexible policies which enable provision to be made, where relevant, for such groups. This may be through the allocation of sites specifically aimed at delivering products for those with particular needs to mainstream housing which offer opportunities for down-sizing.
12. In terms of affordable housing it is important that the targets and thresholds set within any affordable housing policy are realistic and based upon identified needs and economic viability. The HBF supports a flexible approach as set out within option B. This is also consistent with the NPPF. It is important that in utilising such an approach unrealistic targets are not set within the policy as this will simply slow development as all new schemes would need to be negotiated to a viable level.

Q11 Please let us know your preferred option in order of preference & Q 12 Do you think we have considered all reasonable options for the location of future growth in Doncaster?

13. The HBF does not have a specific preference for the broad location of new growth, nor specific percentages allocated to individual settlements. Our key concern is ensuring that the housing requirement can be delivered.
14. Option 1, business as usual, has so far failed to deliver the quantity of housing required to meet the housing needs of the area. This does not mean this option should be completely abandoned but a more thorough understanding of which sites and localities are able to deliver, over the plan period, is required. Given that the majority of the viability issues are experienced within existing urban areas it also would not appear a realistic option to increase the rates of development within such areas above the business as usual scenario, unless sufficient deliverable sites can be identified. Without key elements of the plan such as the proposed housing requirement, evidence upon economic viability and the outcome of any Green Belt review it is difficult to identify which option would be most appropriate.

Q13 Do you have any other comments on the Local Plan?

15. The HBF is pleased to note the recent positive recommendations which emerged from the Council's '*Delivery of Additional Housing Review*', which included greater engagement with the industry. To ensure that engagement is effective it should be provided across a wide range of activities from plan making to the planning application process. In terms of plan making the recently published '*Housing Needs Assessment*' is an integral part of the Local Plan evidence base and an area which the HBF and our members could provide valuable information and guidance. It is therefore concerning that this has been published without the benefit of such engagement.
16. The '*Housing Needs Assessment*' identifies an objectively assessed housing need (OAN) of approximately 920dpa over the plan period. This is a significant reduction upon the previous plan requirement set by the former Regional Spatial Strategy (RSS) of 1,230dpa. The HBF has a number of concerns with the identification of the OAN and based upon the information provided considers that it under-estimates need when all factors are considered. In summary our key concerns are;
- Whilst the 2012 SNHP should be utilised as the starting point for the OAN, the Council needs to consider to what extent they have been influenced by various factors including the impact of the recession and previous delivery. In this regard the last five years, which heavily influence the SNHP, have been typified by a period of under-delivery and high levels of outward migration. It is not considered that these issues have been adequately considered by the report;
 - There is a significant reliance upon bringing empty properties back into use;
 - The study makes significant assumptions regarding employment and economic activity rates which have the effect of significantly dampening the OAN; and
 - Market signals appear to be underplayed, particularly with regards the increasing affordability issues and the need for affordable housing.
17. Prior to the next stage of consultation the HBF would welcome further engagement with the industry over this crucial study and the evolution of the OAN for the Doncaster.

18. Throughout our response to this consultation we have stressed the need for a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites which are attractive to a wide cross-section of the market. This will ensure that enough sales outlets are available to meet and maintain the required levels of housing delivery. The HBF also strongly recommend that the plan allocates more sites than required to meet the housing requirement. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible.

19. The plan must also be viable. This is a particularly important consideration in relation to the policies proposed to be included within the plan as well as the location of sites. The HBF recommends that the Council works closely with the development industry in the production a whole plan viability assessment to ensure that any assumptions made are founded upon credible local evidence.

Further information

20. 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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