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Dear Sir / Madam

Homes and Settlements Consultation

1. Thank you for consulting with the Home Builders Federation (HBF) on the Doncaster Local Plan: Homes and Settlements 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 brief comments. A more detailed analysis of the plan and its policies will be provided at later stages of consultation.

Proposed Draft Approach: Broad Principles

4. Table A1 of the consultation document identifies a number of broad principles, marked A to P, for the emerging plan. The HBF wish to make the following observations.

A: Housing Requirement

5. The Council identifies a net housing requirement of 920 dwellings per annum (dpa) over the plan period (2015 to 2032). The Council will be aware of our previous concerns regarding the derivation of the housing requirement. These are expressed within our comments upon the Issues and Options consultation, dated 4th September 2015. In summary these concerns related to the reliance upon bringing empty homes back into use, the effects of the recession upon headship rates, overly ambitious assumptions regarding economic activity rates and the lack of uplift for market signals despite rising affordability issues and poor rates of delivery. These concerns remain valid and have not been addressed.
6. In addition to our previous comments it is also worth noting that whilst the chosen requirement of 920dpa does not directly compare to any of the tested scenarios it

most closely relates to the outputs of the REM modelling, as indicated on page 80 and 82 of the 2015 *Housing Needs Assessment*. The HBF do not recommend an over-reliance upon a housing need figure derived from an economic model such as the REM. This is because the REM is essentially an economic forecasting model and not a population model. The problems with reliance upon such models are clearly expressed within the July 2015 PAS guidance '*Objectively Assessed Need and Housing Targets: Technical advice note*'. This guidance, paragraphs 8.5 to 8.10, identifies that such models often produce invalid results due to circularity and / or flawed logic. This is because population is both an input and an output of the model. The examination of the now withdrawn Bury Core Strategy lends weight to this argument. A more appropriate methodology is, according to the PAS advice, to integrate demographic projections and economic forecasting. This would lend more weight to the POPGROUP outputs which consistently identify a higher housing figure within Doncaster (1,093). It is notable that the use of POPGROUP has been accepted at numerous Local Plan examinations, whereas the same is not true for the REM.

7. It is evident that there is a significant pent-up demand for new housing within Doncaster due to the lack of delivery over recent years. This demand is likely to increase as the economic opportunities identified within *Doncaster's Economic Growth Plan* come to fruition.
8. The HBF therefore recommend that greater weight be attached to the outputs from the POPGROUP modelling which in itself, due to the issues raised in our previous consultation response, may be an under-estimate.

B: Housing Allocations

9. The Council is aiming to provide allocations sufficient to meet 15 of the 17 years supply. In not providing allocations for the full supply the Council should clearly and robustly evidence how the remaining requirement is to be met. It is also recommended that a buffer of sites is provided. The need for a buffer is two-fold, firstly to comply with the NPPF and PPG requirements for plans to be positively prepared and provide a significant boost to supply the housing requirement should be seen as a minimum, as identified in the draft policy, and as such the Council should provide opportunities to surpass this requirement. Secondly a buffer will provide market choice and allow for any under or none delivery from specific allocations or sources of supply.

C to H: Settlement Hierarchy and Housing Distribution

10. The HBF do not wish to comment upon the split between settlements. It is, however, important that whatever distribution is chosen that it is justifiable and provides a deliverable supply of sites which meet as a minimum the housing requirement. It is also recommended that flexibility is provided to the requirements identified for specific settlements identified in Table A2 and allocations within Table A3 of the consultation document.

I to K: Constraints and Other Considerations

11. The HBF has no comments at this stage.

L to P: Existing Planning Permissions and Additional Housing Land Supply

12. The identification of additional sources of supply is in principle acceptable providing that the overall housing requirement can be met as a minimum and the sources are reliable and deliverable within the current market. The Council should not seek to include sources of supply which are not deliverable. In this regard the HBF query the inclusion of those site within 'L' (i.e. sites which are suitable but not deliverable) as they are unlikely to be brought forward and as such do not provide a reliable source of supply. It is noted, paragraph 40, that these sites will be '*Reserve Development Sites*' that could allow for housing to come forward, possibly within the plan period in which case this would be a housing land supply that would be additional to the Allocations. Providing that the other sources of supply identified within L to P would provide sufficient deliverable sites in combination with the allocations to meet as a minimum the housing requirement, plus a buffer, the HBF do not have any objection to the inclusion of such sites.

13. In terms of windfall sites (M) it is important that the assessment of delivery from such sites is based upon credible evidence base of past completions and the likelihood that they will continue to provide a reliable source of supply (NPPF, paragraph 48). The current Strategic Housing Land Availability Assessment (SHLAA) does not provide this information as windfalls were excluded. In determining the likely rate of future windfall delivery the Council must have regard not only to past delivery but importantly the effect of having an up to date plan with allocations and a more detailed evidence base in terms of future iterations of the SHLAA or Strategic Housing and Employment Land Availability Assessment (SHELAA). The HBF would guard against an over-reliance upon windfalls.

14. In terms of part 'O' the Council is referred to our previous comments above (paragraph 8).

Reason for this Approach

Paragraph 47

15. Paragraph 47 of the consultation document refers to the need to potentially amend Green Belt boundaries and ensure that any new defensible boundary endures beyond the plan period. The NPPF, paragraphs 83 to 85, provides the mechanism for releasing Green Belt through the Local Plan process and requires local authorities to demonstrate exceptional circumstances. Providing other avenues of delivery have been explored the need to meet the housing needs of an area has been accepted to meet exceptional circumstances in other Local Plan examinations. In this regard, and taking account of the wider growth ambitions of the city region, as well as the need to increase the levels of house building within Doncaster the HBF agrees that Green Belt release should be considered through the plan.

16. In terms of safeguarded land the HBF supports the principle of its identification as this should provide certainty over the Green Belt boundaries beyond the plan period. This is consistent with the NPPF.

17. The NPPF, paragraph 85, identifies that where necessary Local Plans should provide safeguarded land to meet longer term development needs stretching '*well beyond the plan period*' and that local authorities should satisfy themselves that Green Belt boundaries '*will not need to be altered at the end of the development plan period*'. Furthermore NPPF paragraph 83 is clear that once established Green Belt boundaries should be '*...capable of enduring beyond the plan period*'. There is therefore an in-built presumption within the NPPF that where it is justified to amend Green Belt boundaries this should be undertaken as part of the local plan process and that the new Green Belt boundaries should not require alteration at the end of the plan period.

18. Whilst there have been numerous interpretations of the above requirements the HBF consider that a 15 year time horizon post plan period should be adopted. This would accord with the NPPF preference for Local Plans to be drawn up over a 15 year time horizon (paragraph 157).

Paragraph 52

19. The paragraph suggests that the buffer of deliverable housing land required to comply with NPPF paragraph 47 will be 5% at the start of the plan period. It is unclear why this would be the case given that Doncaster has systematically failed to meet its housing requirement for a significant number of years, as illustrated by section 4.4.8 of the 2015 *Housing Needs Assessment*. The NPPF, paragraph 47, does not suggest that this performance be re-set once a new plan is adopted. The HBF therefore consider that due to the persistent under-delivery within Doncaster a 20% buffer will be required.

Proposed Draft Local Plan Policy

20. The HBF supports the identification of the requirement as a minimum. Other elements of the policy are discussed in greater detail against the relevant sections above.

Further Consultations

21. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents.

Yours sincerely,

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