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15/04/2016

Dear Sir / Madam

Sustainability Appraisal of Doncaster's Growth Options

1. Thank you for consulting with the Home Builders Federation (HBF) on the Sustainability Appraisal (SA) of the Growth Options for the emerging Local Plan. The following comments should be read in conjunction with our comments upon the 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.

SA Process

4. The HBF recognise that the Growth Options SA is primarily concerned with the distribution of development. There is, however, no consideration of differing rates of housing growth at any stage of the SA process. The SA process is an iterative process and therefore prior to concluding that 920dpa is the most appropriate figure for Doncaster a consideration of other reasonable housing requirements should have been considered. The SA identifies at paragraph 4.15 that;

"Doncaster's objectively assessed need is based upon a single figure (rather than a series of ranges) as it most accurately reflects the particular circumstances of the borough and the market signals/historic trends..."

5. The Council will be aware through our previous representations upon the plan and our comments upon the parallel Homes and Settlements consultation that the HBF consider that the housing requirement is flawed. It is also notable that the 2015 *Housing Needs Assessment* provides for a range of figures and that the 920dpa figure chosen by the Council is simply the Council's preferred figure within a range

of scenarios, rather than the implication within the SA that the objectively assessed need is based upon a single figure.

6. Given that the *Housing Needs assessment*, which is a fundamental element of the plan evidence base, identifies a range of potential housing requirements it would appear reasonable to consider other housing requirements through the SA process. Paragraph 4.15 of the SA does provide a suggestion why it would be inappropriate to consider a higher or lower housing requirement figure. The reasoning provided is based upon the Council being signed up to the Sheffield City Region *Growth Plan*, the availability of land, the Council's growth ambitions and the requirements of the Duty to Co-operate. Whilst these are all legitimate considerations they do not negate the fact that the chosen housing requirement is based upon a number of significant assumptions and that other scenarios within the *Housing Needs Assessment* would also achieve the same level of growth.
7. The failure to consider these alternative levels of housing growth is considered a significant failing within the SA which could lead to issues of soundness at examination. It is recommended that the Council seek to address this issue at the earliest opportunity and provide a transparent consideration within the SA of the relative merits of the options which would achieve the levels of economic growth to which the Council is committed.

Further Consultations

8. 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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