

Local Plans Team  
Planning, Regeneration and Environment Services  
Doncaster Council  
Civic Office  
Waterdale  
Doncaster  
DN1 3BU

SENT BY EMAIL

[localplan@doncaster.gov.uk](mailto:localplan@doncaster.gov.uk)

18/03/2021

Dear Sir / Madam,

### **DONCASTER LOCAL PLAN: MAIN MODIFICATIONS**

1. Thank you for consulting with the Home Builders Federation (HBF) on the Doncaster Local Plan Main Modifications consultation.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. The HBF would like to submit the following comments on the proposed Main Modifications.

#### **MM14 – Policy 2: Level of Growth**

4. The HBF supports the amendment to this policy to simplify and make clear the level of housing to be provided.

#### **MM5 – Paragraph 4.78**

5. The HBF does not consider that this modification is sound, the Council propose to amend this paragraph to state that any shortfall in the five-year housing land supply will be spread across the remainder of the plan period (i.e., use the Liverpool Method). The HBF does not consider it is appropriate to use the Liverpool Method, this is not considered to be consistent with national policy set out within the NPPF and is not considered to be sound. The HBF would expect, if there was any shortfall, for this to be addressed using the Sedgefield method. The Sedgefield method is considered to be in compliance with the Governments ambitions to boost housing supply, and PPG<sup>1</sup>, which states that *'the level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5-year*

---

<sup>1</sup> PPG ID: 68-031-20190722



*period (the Sedgefield approach), then the appropriate buffer should be applied'. If the Council wishes to deviate from this approach, they need to provide the justification.*

**MM182 – Policy 45: Housing Design Standards**

6. The HBF does not consider that this modification is sound. The HBF continues to be concerned by the requirement for all new residential development to comply with the NDSS and considers this to be yet another potential viability burden which may impact on the deliverability of homes.
7. The HBF remains concerned that the need for the introduction of the M4(2) standard has not been sufficiently evidenced and consider that the policy should be deleted.
8. However, if the policy is to be retained, the HBF does however, support the inclusion of additional text in relation to vulnerability to flooding, site topography or step free access, if the policy is to be retained.

**Future Engagement**

9. I trust that the Council will find these comments useful as it continues to progress its Local Plan to adoption. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
10. The HBF would like to be kept informed of the adoption of the Local Plan and the production of the Inspectors Report, along with consultations upon associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



**Joanne Harding**  
**Planning Manager – Local Plan (North)**  
Email: [joanne.harding@hbf.co.uk](mailto:joanne.harding@hbf.co.uk)  
Phone: 07972 774 229