

Local Plans Team
Planning, Regeneration and Environment Services
Doncaster Council
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SENT BY EMAIL
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26/10/2018

Dear Sir / Madam,

DONCASTER LOCAL PLAN

Thank you for consulting with the Home Builders Federation on the Doncaster Local Plan consultation on the Draft Policies and Proposed Sites. The HBF note that the consultation documents have been prepared in line with the 2012 NPPF and that it will be updated to reflect the revised NPPF 2018.

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.

We would like to submit the following comments, these follow on from previous comments made to the Issues & Options and Home & Settlements consultations carried out in 2015 and 2016 respectively.

Vision

The HBF is generally supportive of the bullet point within the vision states that states that Doncaster will *'meet our communities housing needs and aspirations focusing growth in the main urban area, main towns, service towns and larger villages providing a diverse range of homes'*. 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

Objectives

Objective 4 encourages the re-use of sites and buildings, 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. Therefore, this objective is generally supported providing this is not interpreted as prioritisation of such sites. The Council should seek to build upon mechanisms such as the Brownfield Register to encourage the re-use of previously developed land alongside greenfield opportunities.

The HBF is generally supportive of the objectives contained within the Homes and Communities section. The HBF would, however, seek clarity in relation to objective 11, as it is not clear how the growth in homes and jobs will link to the provision of new and improved infrastructure, and how this will lead to the creation of healthier and more vibrant communities.

Policy 2: Spatial Strategy and Settlement Hierarchy (Strategic Policy)

This policy sets out the proportion of homes that will be completed in the 'Main Urban Area', 'Main Towns' and the 'Service Towns and Larger Villages'. The HBF would expect the spatial distribution of sites to follow a logical hierarchy, provide an appropriate development pattern and support sustainable development within all market areas.

This policy highlights that Safeguarded Land has been removed from the Green Belt but not allocated for development to meet longer development needs equivalent to 5 years beyond the Plan period. Whilst there is no definitive guidance indicating the amount of land which should be safeguarded the NPPF (2018) is clear that where necessary Local Plans should *'identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period'*, and that local authorities should *'be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period'*. Given that the proposed plan will have a 17-year time horizon it is considered that safeguarded land requirement should seek to match this. This will not only provide a robust long-term Green Belt boundary but will also provide certainty for residents and developers alike in terms of likely growth locations beyond the end of the plan period.

The HBF would also anticipate the plan to provide triggers which would indicate when the safeguarded land would be considered for release, through a plan review. The Council will be aware of the housing delivery test, this will require an action plan to be taken if delivery falls below 95% of the Council's annual housing requirement. The release of safeguarded land could be linked to a trigger if the plan is failing to deliver as anticipated.

Policy 3: Level and Distribution of Growth (Strategic Policy)

The Council has continued to identify a net housing requirement of 920 dwellings per annum (dpa) over the plan period 2015-2032. 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 and 15th April 2016. 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, the lack of uplift for market signals despite rising affordability issues, poor rates of delivery, and the lack of a direct relation to any of the tested scenarios. These concerns remain valid and have not been addressed.

The HBF do not wish to comment upon the exact distribution of development. The HBF is keen to ensure that the Council produces 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 to provide enough sales outlets to enable delivery to be maintained at the required levels.

The HBF consider that it is important that the levels of development proposed for each settlement is informed by appropriate analysis of the deliverability and viability of the sites. The HBF and our members can provide valuable advice on issues of housing delivery and would be keen to work proactively with the Council on this issue. It is no use continually promoting growth in locations if there is little or no prospect of them being brought forward.

The HBF also consider that it would not be appropriate to utilise the settlement hierarchy to limit development in other suitable locations, and as such it is important that the housing figures are taken as a minimum not a limit.

Policy 6: Housing Allocations (Strategic Policy)

The HBF are keen that the Council produces 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 to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The HBF and our members can provide valuable advice on issues of housing delivery and would be keen to work proactively with the Council on this issue.

The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement as a buffer. 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. The HBF recommends as large a contingency as possible (circa at least 20%) to the overall housing land supply to provide sufficient flexibility for unforeseen circumstances and in acknowledgement that the housing requirement is a minimum not a maximum figure.

The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The Council's assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data.

The HBF representations are submitted without prejudice to any comments made by other parties on the deliverability of specific sites included in the overall HLS, 5 YHLS and housing trajectories. However, the HBF do have some concerns about the delivery of homes and seek assurance that the housing requirement will be delivered.

Policy 8: Delivering the necessary range of housing (Strategic Policy)

Housing Mix

The HBF understands the need for a mix of house size, type, price and tenure and is generally supportive of providing a range and choice of homes to meet the needs and market demand in the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements or the need to provide significant amounts of additional evidence.

The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location. The HBF would also highlight the need for creating a housing market that will attract investors to Doncaster, and to provide an element of aspiration to ensure working people and families are retained within the area. The HBF consider that the Council need to be aware that the latest Housing Need Assessment will only ever identify current deficits and reflects a snap-shot in time. Therefore, even the latest HNA may not reflect the position at the time of an application. The HBF would like to ensure greater flexibility within this policy to acknowledge that the mix can vary both geographically and over the plan period.

Affordable Housing

This policy requires housing sites of 15 or more homes in the Borough's high value housing market areas to include 25% affordable homes and for 15% of affordable in other areas.

The HBF does not dispute the need for affordable housing within Doncaster and indeed supports the need to address the affordable housing requirements of the borough. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability. Paragraph 34 of the NPPF (2018) established the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened.

Tables 3-14 of the Viability Report show the issues of viability for a number of sites. It shows that the schemes in the low value areas were not able to support any level of affordable housing, whilst a number of schemes in the medium value areas would also struggle to provide the 15% required by this policy, particularly if the BCIS median values are used.

The Council should be mindful that it is unrealistic to negotiate every site on a one by one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery. Therefore, site by site negotiations on these sites should occur occasionally rather than routinely.

The Council may also want to take into consideration the potential amendments to the definition of affordable homes and their provision, as set out in the NPPF.

Adaptable and Accessible housing

This policy states that new developments should aim to include the provision of homes which are adaptable, accessible and suitable for people with a wide range of needs. The HBF considers that supporting the adaptation of the existing stock and encouraging the provision of adaptable, accessible homes is appropriate. We do not however, consider that it is appropriate to require all developments to include this provision, as set out in the response to Policy 46.

Custom and self- build homes

This policy supports the provision of opportunities to accommodate custom and self-build homes and encourages provision on housing allocations or elsewhere. Many of our members will be able to assist the custom build sector either through the physical building of dwellings on behalf of the homeowner or through the provision of plots for sale to custom builders. The HBF are, therefore, not opposed to the idea of increasing the self-build and custom build sector for its potential contribution to the overall housing supply. However, this policy approach only changes the house building delivery mechanism from one form of house building company to another without any consequential additional contribution to boosting housing supply.

The HBF would recommend appropriate evidence is collated to ensure that house building delivery from this source provides an additional contribution to boosting housing supply. This is likely to include engaging with landowners and working with custom build developers to maximise opportunities. The HBF would also be interested to see the evidence to support the idea that those wanting to self-build would actually consider building within a larger housing development.

Policy 22: Telecommunications and Utilities Infrastructure

This policy requires all new housing and commercial developments to provide connectivity to the Superfast Broadband network unless it can be clearly demonstrated that this is not possible.

The HBF generally consider that digital infrastructure is an important part of integrated development within an area. However, the inclusion of digital infrastructure such as high-speed broadband and fibre is not within the direct control of the development industry, and as such it is considered that this policy could create deliverability issues for development and developers. Service providers are the only ones who can confirm access to infrastructure. Whilst, paragraph 112 of the NPPF (2018) establishes that local planning authorities should seek support the expansion of electronic communications networks it does not seek to prevent development that does not have access to such networks. The house building industry is fully aware of the benefits of having their homes connected to super-fast broadband and what their customers will demand.

The HBF consider that in seeking to provide broadband the Council should work proactively with telecommunications providers to extend provision and not rely on the development industry to provide for such infrastructure. The Council should also note that Part R of the Building Regulations clearly sets the appropriate standards for high speed electronic communication networks, that are within the control of the housebuilder.

Policy 29: Open Space Provision in New Developments

This policy looks for residential developments to provide open space to address local green space needs and deficiencies. Overall, the HBF is supportive of the drive towards incorporating additional green space within new communities. However, developers should only be expected to provide for those facilities which are made necessary by the development proposed and not simply in order to make up for existing deficiencies in provision or provide benefits for the community at large. It should also be acknowledged that this may have a knock-on effect on housing density and the need for additional land to be allocated for new development.

Policy 43: Good Urban Design (Strategic Policy)

The HBF are generally satisfied with the principle of part (a) of the policy which looks for development to optimise the potential of a site and make the most efficient use of land whilst responding to location, local character, relevant spatial requirements and standards. However, the HBF would recommend that the policy should be amended further to allow for flexibility and include additional factors such as market aspirations and viability.

Policy 46: Housing Design Standards (Strategic Policy)

Nationally Described Space Standard

This policy looks for development to meet national spaces standards as a minimum (for residential). However, these enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis.

PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

- **Need** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.
- **Viability** – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
- **Timing** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'.

The Council will need robust justifiable evidence to introduce any of the optional housing standards, based on the criteria set out above.

The HBF consider that if the Government had just expected all properties to be built to NDSS that they would have made these standards mandatory not optional. It is

also noted that there is no reference within the policy or the evidence in relation to timing or a transitional period.

The HBF consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The industry knows its customers and what they want, our members would not sell homes below the enhanced standard size if they did not appeal to the market.

Accessible and Adaptable Dwellings (M4(2))

The HBF is generally supportive of providing homes that are suitable to meet the needs of those with limiting long term illnesses or disabilities. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG.

PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Doncaster which justifies the inclusion of optional higher standards for accessible / adaptable homes in its Local Plan policy. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommend that an appropriate transition period is included within the policy.

The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances; and that policies for wheelchair accessible homes should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.

Policy 67: Development Viability (Strategic Policy)

The HBF considers that there may be some circumstances where this policy and the use of trigger points can be utilised to bring forward the delivery of homes. However, the HBF have significant concerns around the implementation of this policy and how frequently it will be used. The use of trigger points could add further burdens to any developer who will need to reproduce viability assessments at a potentially regular basis, going against Government initiatives which are looking to reduce the need for viability assessments. The HBF considers that this policy causes unnecessary uncertainty and additional risk for developers, and that such disincentivising of developers could become an impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long time periods.

Future Engagement

I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J. Harding', written in a cursive style.

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