

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

SENT BY EMAIL
localplan@doncaster.gov.uk
28/09/2019

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 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, Home & Settlements consultation, Draft Local Plan carried out in 2015, 2016 and 2018 respectively.

Plan Period

It is noted that the Plan period runs from 2015 until 2035. Paragraph 22 of the NPPF looks for Plans to have a 15-year period from adoption. As the consultation is only just being undertaken for the Regulation 19 stage, it is unlikely that the Plan will be adopted in 2020. Therefore, the HBF consider that it may be beneficial to take a cautious approach and to extend the Plan period.

The HBF also note that the Plan period for land supply runs from 2018, and in the case of housing appears to run until 2033. This appears confused and an unnecessary complication.

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

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.

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

Policy 3 is not considered to be sound as it is not positively prepared, justified or consistent with national policy for the following reasons:

The Council has continued to identify a net housing requirement of 920 dwellings per annum (dpa) over the plan period 2015-2035.

Paragraph 60 of the NPPF 2019 states that *'to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals'*.

The HBF have considered the local housing need (LHN) using the Standard Methodology set out in PPG, it can be calculated as follows:

Step 1 - Setting the baseline:

2014-based household projections in England average annual household growth over a 10 year period, with the current year being used as the starting point. The household projection for 2019 is 131,355 and in 2029 it is 136,591, therefore the growth equals 5,236, giving an average of 523.6 dwellings each year.

Step 2 - An adjustment to take account of affordability:

The most recent median workplace-based affordability ratio for Doncaster (2018) is 4.81.

Where an adjustment is to be made, the formula is:

$$\text{Adjustment factor} = \left(\frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

For Doncaster this would be: Adjustment Factor = (((4.81 - 4) / 4) x 0.25) + 1 = 1.051

Minimum annual local housing need figure = (adjustment factor) x projected household growth

For Doncaster this would be: Minimum annual local housing need figure = $1.051 \times 523.6 = 550$ dpa.

Step 3 - Capping the level of any increase

The Doncaster Core Strategy was adopted more than 5 years ago, therefore the local housing need figure is capped at 40% above whichever is the higher of: the projected household growth for the area over the 10 year period identified in step 1; or the average annual housing requirement figure set out in the most recently adopted strategic policies.

The Doncaster Core Strategy has a housing requirement of 1,230 new homes each year 2011-2028, 40% above 1,230 would be 1,772dpa. The capped figure is greater than the minimum annual local housing need figure and therefore does not limit the increase to the local authority's minimum annual housing need figure.

It should be noted that the Standard Method identifies a minimum annual housing need figure, it does not produce a housing requirement figure. It should also be noted that the Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The Standard Method provides a minimum starting point, and there may be circumstances where it is appropriate to consider whether the actual housing need is higher than the Standard Method indicates. PPG (ID: 2a-010) goes on to states that these circumstances can include growth strategies for the area; strategic infrastructure improvements; previous levels of delivery; or where previous assessments of need are significantly greater than the outcome from the Standard Method.

The Peter Brett Economic Forecasts and Housing Needs Assessment 2018 identifies a demographic starting point from the 2014-based household projections of 562dpa, which if adjusted to match a business as usual job forecast would equate to 579dpa. However, to match the jobs growth aspiration of the Sheffield City Region it identifies a jobs-led housing need of 1,073dpa. Therefore, it is clearly apparent that there are circumstances identified that would require a housing figure significantly greater than the outcome of the Standard Method.

The Council identify that the housing requirement will be expressed as a range with the bottom of the range being the LHN and the top of the range being the 920 dpa. As set out above the HBF do not consider that the LHN produced from the Standard Method would provide an appropriate housing requirement, it is evident that the actual housing requirement should be higher. The HBF do not consider that it would be appropriate to limit the housing requirement at the top end of the requirement either, and do not consider that this would be consistent with the NPPF requirement to support the Government's objective to boost the supply of homes.

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)

Policy 6 is not considered to be sound as it is not positively prepared or consistent with national policy for the following reasons:

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 an appropriate contingency (circa 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)

Policy 8 is not considered to be sound as it is not justified or consistent with national policy for the following reasons:

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 23% 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 (2019) 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.

The Whole Plan Viability Testing (2019) report shows the issues of viability for a number of sites. It shows that schemes in the low value areas are not viable and will not be able to support the affordable housing requirement.

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.

Policy 29: Open Space Provision in New Developments

Policy 29 is not considered to be sound as it is not justified or consistent with national policy for the following reasons:

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 46: Housing Design Standards (Strategic Policy)

Policy 46 is not considered to be sound as it is not justified or consistent with national policy for the following reasons:

Nationally Described Space Standard

This policy looks for all new housing to meet national spaces standards as a minimum. 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 Housing Design Standards Policy Evidence Paper (June 2019) surveyed 246 homes across 47 sites, to determine how many met the NDSS. It is not apparent if these sites had been submitted after the Government introduction of the NDSS, but it seems unlikely that it would have been in place at the time many of the applications were submitted. The Council indicate that through their research they have identified that a number of properties have not been built to the NDSS. They state that *'201 out of the 246 plans assessed met the gross internal floor area based on their proposed number of bedrooms'* and that *'plans were more likely to fail against the NDSS based on storage space or bedroom size, highlighting an internal design issue as opposed to dwelling plot size'*. The Council also suggest that the NDSS would be beneficial in providing ventilation, reducing under-occupancy and over-crowding. However, the evidence provided is limited in terms of numbers of properties considered and the potential market comparisons made. It is not evident from the information provided what 'need' there actually is for properties built to the standards there is no evidence that these smaller properties are not selling, there is no evidence provided that customers are not satisfied with these properties or that these properties are not

comparable to other properties available in the market area. 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.

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.

It should be noted that the HBF Annual Industry Customer Satisfaction Survey published March 2019 and completed by 60,955 new homeowners highlights that 90% of people who have bought a new home would do so again. It also highlights that 93% of homeowners are satisfied with the internal design and layout of their new home. This does not suggest that new homeowners have issues with the size of rooms provided or that there is a need for the NDSS to be introduced.

Accessible and Adaptable Dwellings (M4(2))

Policy 46 looks for 65% of homes on developments of 10 or more (or over 0.5ha) to be at M4(2) standards, and for 5% to be provided at M4(3) standards.

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.

It must be remembered that all new homes will be built to part M4(1). According to Part M of the Building Regulations meeting M4(1) will ensure reasonable provision for most people, including wheelchair users, to approach and enter the dwelling and to access habitable rooms and sanitary facilities on the entrance storey. As such these standards are likely to be suitable for the majority of people.

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.

The Housing Design Standards Policy Evidence Paper (June 2019) identifies that 18.78% of the population of Doncaster was over 65 yrs in 2017 and that 24.83% will be by 2035. The HBF does not dispute the ageing population within Doncaster, however, it is not clear how this ageing population and potential future need reflects in the need for 65% of all new homes to be provided at M4(2) standards. If it had

been the Government's intention that generic statements identifying an ageing population justified adoption of the accessible & adaptable homes standards, then the logical solution would have been to incorporate the M4(2) as mandatory via the Building Regulations which the Government has not done. The optional higher M4(2) standard should only be introduced on a "need to have" rather than a "nice to have" basis. The evidence does not demonstrate this need.

The Housing Design Standards Policy Evidence Paper (June 2019) also states that older people and individuals with a long-term health problem or disability (LTHPD) would prefer to live in smaller, one or two bed- properties. It is not clear how this evidence has been considered in relation to the policy.

The Whole Plan Viability Testing (2019) report shows the issues of viability for a number of sites. It shows that schemes in the low value areas are not viable and will not be able to support the optional housing standards along with the cumulative requirements from other policies.

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)

Policy 67 is not considered to be sound as it is not consistent with national policy for the following reasons:

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 cursive script, appearing to read 'Joanne Harding'.

Joanne Harding

Local Plans Manager – North

Email: joanne.harding@hbf.co.uk

Phone: 07972 774 229