For and on behalf of
Mr RJ Ogley (03008)
Minerals Investments Ltd (Mr Ian Brealey) (03116)
Higgins Agriculture Ltd and Bellway Homes (03467)
Avant Homes (05259, 05303, and 05304 and 05305)
South Yorkshire Housing Association (05214)
Mr K Honcharenko (0234)

DONCASTER LOCAL PLAN EXAMINATION
STAGE 4 HEARING SESSION REPRESENTATION
MATTER 5 HOUSING SUPPLY

Site Allocation Ref: 040 - Land off Sheffield Road, Conisbrough
Site Allocation Ref: 432 - Former Wheatley Hills Middle School, Leger Way
Site Allocation Ref: 170 – Land at Doncaster Road, Hatfield
Mexborough Residential Policy Area – Land at Pastures Road, Mexborough

HELAA Site Ref: 184 - Brodwsworth Quarry, Green Lane, Doncaster
Site Ref: 189 - Higgins Site, Old Bawtry Road, Finningley
Site Ref: 446 – Mosham Road / land east of Hurst Lane, Auckley
Site Ref: 315 – Land west of Station Road, Blaxton

Prepared by
DLP Planning Ltd
Sheffield

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DLP Planning Ltd
Ground Floor V1 Velocity
Tenter Street
Sheffield
S1 4BY

Tel: 01142 289190

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1.0 INTRODUCTION

1.1 This representation has been prepared by DLP Planning Ltd on behalf of Mr RJ Ogley, Minerals Investments Ltd (Mr Ian Brealey), Higgins Agriculture Ltd* and Bellway Homes, Avant Homes, South Yorkshire Housing Association, and Mr K Honcharenko in response to the Stage 4 Examination Hearing Sessions of the Doncaster Local Plan.

1.2 This representation addresses Matter 5 in relation to the following sites:

- Site Allocation Ref: 040 - Land off Sheffield Road, Conisbrough
- Site Allocation Ref: 432 - Former Wheatley Hills Middle School, Leger Way
- Site Allocation Ref: 170 – Land at Doncaster Road, Hatfield
- Mexborough Residential Policy Area – Land at Pastures Road, Mexborough
- HELAA Site Ref: 184 - Brodsworth Quarry, Green Lane, Doncaster
- Site Ref: 189 - Higgins Site, Old Bawtry Road, Finningley
- Site Ref: 446 – Mosham Road / land east of Hurst Lane, Auckley
- Site Ref: 315 – Land west of Station Road, Blaxton

1.3 This document should be read alongside previous representations on the publication version of the Plan, as submitted in September 2019.

*NB - The representor (03467) previously referred to as Higgins Agriculture Ltd is herein referred to as M Higgins Ltd.
2.0 RESPONSE TO INSPECTORS QUESTIONS

Matter 5 – Housing Supply

Issue - Site Selection Methodology

Q5.1. Was the approach to determining which sites to include as housing allocations in the Plan described in the Site Selection Methodology and Results Report justified and consistent with national policy and guidance?

2.1 The approach adopted to site selection was unsound.

2.2 The filtering of sites at Stage 3 appears to be based on the percentage split between different levels of settlements in the hierarchy (table after paragraph 5.1.15 and table 5.1, SDEB46). However, this has been inconsistently applied. For example, the 1,200 housing allocation at the Poplars site in the Auckley - Hayfield Green area near Finningley somehow passes this filtering process as table 5.1 only requires 125 dwellings and 55 dwellings respectively. This means that all the other smaller sites, including those which score more favourably in the SA (such as 446 and 186, see comparison in matter 1), have been rejected because the dwelling requirement set in table 5.1 of the Site Selection Methodology (SDEB46) is just 55 dwellings for Finningley. The juxtaposition of this extremely low dwelling requirement for Finningley, one of the most sustainable settlements in the Borough, is simply not explained.

2.3 How the dwelling limits of 125 dwellings for Auckley - Hayfield Green and 55 dwellings for Finningley in table 5.1 (SDEB46), and the 1,200 dwellings allocation, is simply not addressed. Clearly some allocations have been made outside of both in the site selection process.

2.4 The subsequent rejection of all the potential sites in the neighbouring Finningley in the Site Selection Methodology (SDEB46) is therefore undertaken on a false basis.

2.5 The final decision from the Site Selection process on sites 189 and 446 in Finningley and Auckley is that they are greenfield designated as countryside and the settlements identified local need requirement of 55 and 125 respectively has been met. This is incorrect, particularly as the sites are both brownfield in the main.

2.6 In contrast, the site selection at Conisbrough directly compares site 040 Land at Sheffield Road / Old Road with site 826 Field off Clifton Hill in order to demonstrate that site 040 is the more sustainable option (Site Selection Methodology (SDEB46), table 9.8, page 159). The more detailed analysis of the preference for site 040 is set out in paragraph 9.1.29 (SDEB46),
stating that site 040 has positive effects for access to a bus stop on the core network, is closer located for access to a primary school, has significant positive effects for providing a large affordable housing requirement given the size of the site, is not located on an area with known landfill on the site, and does not impact on biodiversity.

2.7 If the above comparison assessment was undertaken between site 189 (Higgins) and site 940 (Poplars) then there would be a clear conclusion that site 189 should be allocated.

2.8 The Site Selection process is clearly revealed as being inconsistent, and the results cannot be regarded as the most appropriate strategy based on the proportionate evidence.

2.9 In this case, either the location and scale of the Poplars allocation should have been considered on an equal basis with all other reasonable alternatives (as required by law under the SA regulations), or it should have been excluded on the grounds that it exceeds the 55 dwelling limit set in table 5.1 (SDEB46).

2.10 In a way, the opposite has occurred in terms of Brodsworth Quarry. Brodsworth Quarry is a large scale site (like the Poplars site, although unlike the Poplar site it is underutilised, of no agricultural or archaeological value, and of little environmental value) which has simply been excluded at the Stage 3 shifting as the Poplars site should have been because it potentially exceeded what has been demonstrated is a completely random dwelling target.

2.11 If the Site Selection process was to consider sites which are much larger than the dwelling target in table 5.1 (SDEB46), then it should do so on a consistent basis. It simply does not adopt a consist approach, and whilst the smaller allocations such as site 040 appear to have a clear and reasoned justification for their selection this clarity is absent on some of the larger sites.

**Issue - Overall Supply for the Plan Period 2015 to 2035**

Q5.2. Assuming it is modified to include the figures in CSD6, does the Plan identify sufficient land to ensure that the strategic aim of delivering 18,400 new homes in the Plan period 2015 to 2035 can be achieved? In particular, is there a reasonable prospect of:

a) 9,289 new homes being built on allocations with planning permission at 2018?

b) 585 new homes being built on other commitments at 2018?

c) 6,630 new homes being built on allocations without planning permission at 2018?

a) **9,289 new homes being built on allocations with planning permission at 2018?**
2.12 Firstly, we do not consider that 18,400 is a figure that correctly reflects Government guidance. This is because this means from this point onwards only 882 dpa is being planned for. Both the past competitions rates at 1,097 dpa and the job led figure of 1,073 dpa suggest that ongoing demand is much higher than that being made provision for in the Plan. Both a jobs led projection and much higher past rates of completions are matters to be taken into account in setting a housing requirement in accordance with the PPG (paragraph 010, reference ID 2a-010).

2.13 Secondly, we do not consider that the “oversupply” in the first four years of the Plan should be used to discount the overall level of housing requirement. These dwellings are meeting the needs of the current population and not meeting future needs. As such, the future requirement should not be decreased in the way that is being proposed. This position is reinforced by the PPG which states that where areas deliver more completions than required the additional supply can be used to offset any shortfalls against requirements from previous years (paragraph 032, reference ID 68-032-20190722). This does not say that future requirement can be decreased by virtue of past oversupply. Such a position is not supported by the NPPF that does refer to Local Plan housing requirements as being maxima.

2.14 Taking the above into account, the level of housing that should be planned for from 2019 onwards is as follows:

<table>
<thead>
<tr>
<th>Table 1: The Plan requirement for meeting future economic growth</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Dwellings</strong></td>
</tr>
<tr>
<td>Built 2015 to 2019</td>
</tr>
<tr>
<td>Job led projection dpa</td>
</tr>
<tr>
<td>Job led 2019 - 2035</td>
</tr>
<tr>
<td><strong>Total requirement 2015 - 2035</strong></td>
</tr>
</tbody>
</table>

2.15 The Council appear to have provided no detailed trajectory for each site to explain the expected level of completions. There is a summary table below paragraph 7.9.1 in the Housing Topic Paper (DMBC4) and there is also a summary in the Residential Land Availability Report (SDEB26).

2.16 Utilising the same build out rate for large sites of 43 dpa (DMBC4, paragraph 7.5.2) would suggest that some of the larger sites with outline planning permission would not be completed
within the Plan period. It is noted that land between Hatfield, Stainforth, Dunscroft and Dunsville, Doncaster, DN7 for 3,100 dwellings might deliver substantially fewer units (assuming first completions in 2021).

Table 2: Delivery of sites with outline planning permission

<table>
<thead>
<tr>
<th>Address</th>
<th>Units Remaining (net)</th>
<th>Decision Date</th>
<th>Expected first completion</th>
<th>2018 - 33</th>
<th>2033 - 35</th>
<th>2035+</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land Between Hatfield, Stainforth, Dunscroft And Dunsville, Doncaster, DN7</td>
<td>3100</td>
<td>21/04/2017</td>
<td>2021</td>
<td>565</td>
<td>87</td>
<td>2448</td>
<td>3100</td>
</tr>
</tbody>
</table>

2.17 It is also noted that there are a considerable number of sites listed in the Residential Land Availability Report (SDEB26) with both full and outline permission which may have lapsed by the time of the Examination, without evidence to suggest that these are going to be implemented. Of the larger sites (10+ dwellings) there are 8 sites with full planning permission with a total of 360 dwellings (gross) that may fall into this category (see appendix 1).

2.18 The evidence available at the time of the Examination does not support these figures.

b) 585 new homes being built on other commitments at 2018?

2.19 Neither the Council’s Housing Topic Paper nor the Residential Land Availability Report (SDEB26) provide a breakdown of this figure. This relates to small sites in villages and like the comments above there are a very large number of small sites whose permissions may lapse at the time of the Examination. The evidence as presented by the Council does not make it clear what has been included to make up this number, so at present it is not sound.

c) 6,630 new homes being built on allocations without planning permission at 2018?

2.20 Paragraph 7.6.2 (DMBC4) states that the working party agreed that for sites with above 50 units without permission the lead in time would be 3 years. It is our experience (supported by research “Start to Finish” Lichfield 2020) that lead in times for sites of over 50 dwellings vary considerably and this is important given the size of a number of sites in the Plan. This assumption of a lead in time of just 3 years looks considerably over optimistic in light of this research.
2.21 For sites over 500 dwellings without submitted planning applications, the utilisation of an average lead in time of 5 years would leave just 10 years of completions. For sites of 1,000-1,499 dwellings there would be just 9 years of completions. For sites of 1,500-1,999 dwellings there would be 8 years of completions. For sites of 2,000+ dwellings there would be just 6.6 years of completions.

Table 3: Lead in times for new development

<table>
<thead>
<tr>
<th>Site size</th>
<th>Average planning approval period</th>
<th>Average planning to delivery period</th>
<th>Total first application to first dwelling</th>
</tr>
</thead>
<tbody>
<tr>
<td>50-99</td>
<td>1.4</td>
<td>2.0</td>
<td>3.3</td>
</tr>
<tr>
<td>100-499</td>
<td>2.1</td>
<td>1.9</td>
<td>4.0</td>
</tr>
<tr>
<td>500-999</td>
<td>3.3</td>
<td>1.7</td>
<td>5.0</td>
</tr>
<tr>
<td>1,000-1,499</td>
<td>4.6</td>
<td>2.3</td>
<td>6.0</td>
</tr>
<tr>
<td>1,500-1,999</td>
<td>5.3</td>
<td>1.7</td>
<td>7.0</td>
</tr>
<tr>
<td>2,000+</td>
<td>6.1</td>
<td>2.3</td>
<td>8.4</td>
</tr>
</tbody>
</table>

Source: Figure 4 “Start to Finish” Lichfields 2020

2.22 The build out rate for large sites of 70 dpa (DMBC4, paragraph 7.5.1) is not supported by the evidence (DMBC4, paragraph 7.5.4) and is based on an assumption that sites in excess of 400 dwellings will all be completed by 2 volume housebuilders. The actual local completion rates on sites of 400+ dwellings is 43.47 pa. (DMBC4, paragraph 7.5.2). Using this local average rate of completions suggests that all of the following allocations may not be completed within the Plan period.

Table 4: Average rate of completions

<table>
<thead>
<tr>
<th>Site size</th>
<th>Average planning approval period</th>
<th>Average planning to delivery period</th>
<th>Total first application to first dwelling</th>
<th>Average build out rate</th>
<th>Years of build left</th>
<th>Completed in plan period</th>
</tr>
</thead>
<tbody>
<tr>
<td>50-99</td>
<td>1.4</td>
<td>2.0</td>
<td>3.3</td>
<td>26.41</td>
<td>13.6</td>
<td>359</td>
</tr>
<tr>
<td>100-499</td>
<td>2.1</td>
<td>1.9</td>
<td>4.0</td>
<td>40.11</td>
<td>12.9</td>
<td>517</td>
</tr>
<tr>
<td>500-999</td>
<td>3.3</td>
<td>1.7</td>
<td>5.0</td>
<td>43.47</td>
<td>11.7</td>
<td>509</td>
</tr>
<tr>
<td>1,000-1,499</td>
<td>4.6</td>
<td>2.3</td>
<td>6.0</td>
<td>43.47</td>
<td>10.4</td>
<td>452</td>
</tr>
<tr>
<td>1,500-1,999</td>
<td>5.3</td>
<td>1.7</td>
<td>7.0</td>
<td>43.47</td>
<td>9.7</td>
<td>422</td>
</tr>
<tr>
<td>2,000+</td>
<td>6.1</td>
<td>2.3</td>
<td>8.4</td>
<td>43.47</td>
<td>8.9</td>
<td>387</td>
</tr>
</tbody>
</table>

Source: DMBC4 and Figure 4 “Start to Finish” Lichfields 2020

2.23 The implication of the evidence is that the following sites might only partially deliver in the Plan period, reducing the total expected delivery within the Plan period to 2035 by 891
dwellings.

Table 5: Implications of local build out rate and average lead in times

<table>
<thead>
<tr>
<th>Site Number</th>
<th>DMDC delivery</th>
<th>2018 - 33</th>
<th>2033 - 35</th>
<th>2035+</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>241</td>
<td>Land to the East of Mere Lane,</td>
<td>600</td>
<td>0</td>
<td>0</td>
<td>600</td>
</tr>
<tr>
<td></td>
<td>Edenthorpe</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>255</td>
<td>Former Hungerhill Business Park,</td>
<td>542</td>
<td>0</td>
<td>0</td>
<td>542</td>
</tr>
<tr>
<td></td>
<td>Thorne Road</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>836</td>
<td>Land South Of Woodfield Way, Balby</td>
<td>840</td>
<td>140</td>
<td>151</td>
<td>1131</td>
</tr>
</tbody>
</table>

Adjusted delivery

<table>
<thead>
<tr>
<th>Site Number</th>
<th>DMDC delivery</th>
<th>2018 - 33</th>
<th>2033 - 35</th>
<th>2035+</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>241</td>
<td>Land to the East of Mere Lane,</td>
<td>422</td>
<td>87</td>
<td>91</td>
<td>600</td>
</tr>
<tr>
<td></td>
<td>Edenthorpe</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>255</td>
<td>Former Hungerhill Business Park,</td>
<td>365</td>
<td>87</td>
<td>90</td>
<td>542</td>
</tr>
<tr>
<td></td>
<td>Thorne Road</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>836</td>
<td>Land South Of Woodfield Way, Balby</td>
<td>335</td>
<td>87</td>
<td>709</td>
<td>1131</td>
</tr>
</tbody>
</table>

Totals 1122 261 891 2273

Source: SBDE26 Remaining units detail

Q5.3. Should Table 5 of the Plan be modified to include the following, having regard to policies 2, 3 and 11 relating to development on unallocated sites and policy 7 relating to Doncaster Sheffield Airport:

a) a windfall allowance of 3,400 new homes, or some other figure?
b) 290 windfalls at Defined Villages?
c) 197 new homes on windfalls on sites identified in the brownfield register 2019?
d) New homes at Doncaster Sheffield Airport?

Should any such housing completions count towards achieving the aim of delivering 18,400 new homes in the Plan period?

2.24 In paragraph 7.19.7 (DMBC4) it states that 200 dpa should be added to the supply as an allowance. However, this double counts both completions since 2018 and small sites with planning permission. It also includes completions from large windfall sites which should have been identified as part of the site selection process. The data analysis does not distinguish those completions on garden sites which should be discounted. Although the 5 year land supply suggests that the 200 a year includes a discount, there is no explanation of how this has been done.

2.25 In relation to a), b) and c), table 5 in the publication version of the draft Local Plan sets out that any windfalls will be additional to allocated supply. The Council’s response to PQ26 stated that there is “strong evidence for a windfall allowance based on historic delivery, but very little in the way of evidencing a potential future supply from specific sites in the HELAA” and paragraph 70 of the NPPF requires compelling evidence and whilst there is evidence that in the past a number of completions have come forward on unallocated sites, the lack of
a detailed analysis of the nature of sites that made up these past completions and the lack of clarity regarding how any discount has been applied to reflect the small sites that already have planning permission means that at present there is not the compelling evidence required to include a windfall allowance. Their exclusion is therefore supported, and their delivery should be viewed as additional to the delivery of identified allocations to assist with choice within the Borough.

2.26 In respect of d) regarding additional and reserve sites identified within Policy 7 and the Airport Masterplan; these sites should not be included in table 5 as their delivery is expressly linked to employment growth and cannot therefore be relied upon within the context of paragraph 16 of the NPPF. The robustness of the approach to policy 7 is questioned elsewhere in our response and it is considered that the correct approach is to exclude these figures from table 5.

Q5.4. To be effective, should Table 5 of the Plan and/or other parts of the reasoned justification for policy 6 be modified to set out explicitly what the total housing supply is for the Plan period 2015 to 2035?

2.27 Yes. We consider that some potential sources of supply are not based on sound evidence and as such should be excluded from the policy and reference to these and the associated estimated number of dwellings should be moved to the supporting text.

**Issue - Small and Medium Sized Sites**

Q5.5. Will the Plan be effective in helping to ensure that at least 10% of the housing requirement is met on sites no larger than one hectare? Is it necessary to modify paragraph 4.81 of the Plan as set out in the Council’s response to PQ31?

2.28 Based on the modification to paragraph 4.81 as set out in the Council’s response to PQ31 the Plan should be effective in helping to ensure that at least 10% of the housing requirement is met on sites no larger than one hectare in accordance with the NPPF (paragraph 68a).

**Issue - Five Year Housing Land Requirement**

Q5.6. Is the proposal in policy 3 to have a variable figure for the five year requirement consistent with national policy? Would it be effective in helping to ensure that the need for homes identified in the Plan can be met? If not, how should the five year requirement be calculated?

2.29 The proposal to have a variable figure for the five year requirement or to rely upon the Local Housing Need figure, which currently forms the lower end of the housing requirement range,
is ineffective and inconsistent with national policy objectives of delivering new homes. Paragraph 73 of the NPPF states that the five year supply should be based on the housing requirement. This should not be a range and in this case it should be based on the figure of **1,073 dpa** as supported by the evidence base to the draft Local Plan to reflect economic growth aspirations.

2.30 The identification and application of a clear housing requirement figure, to be applied within policy 3 as a minimum net figure, will ensure clarity and support the need for homes identified in the Plan to be met.

2.31 **Modification** – Amend policy 3 (bullet point 2) to state:

- **18,400** **21,460** new homes in the period 2015 – 2035 (**920 1,073 per annum**), with sufficient land allocated to deliver 15 years’ supply of housing (13,230, **16,095** or **882 1,073 dwellings per annum, once as the supply in the years 2015 – 2018 at the slightly higher rate was clearly meeting demand at that time and these dwellings will not be available to meet future emerging needs and so this “oversupply” should not be is deducted from the overall requirement). For the purposes of calculating 5-year housing land supply, the net requirement will be **1,073 per annum based on the Local Housing Need figure, as derived from the Standard Methodology, which will be reviewed and revised throughout the plan period in line with the latest household projections and affordability ratio. As such, the housing requirement is expressed as a range with the bottom of the range being the Local Housing Need figure and the top of the range being 920 dwellings per annum;**

**Issue - Five Year Housing Land Supply**

Q5.7. Is there clear evidence that any of the 3,685 dwellings on sites with planning permission in categories A and B on 1 April 2019 will not be completed by 31 March 2024?

2.32 Appendix A of the 5-Year Deliverable Housing Land Supply Statement (SDEB27) lacks the level of detail in terms of supporting evidence that is required to both support the inclusion of these sites and justify the lead in times and buildout rates. For many of the sites the explanation is simply left blank.

2.33 A number of the commentary has come from promoters and there is no reference to their engagement with housebuilders in respect of establishing lead in times and build out rates.
2.34 We have highlighted that both the lead in times of 3 years being used for sites of over 400 dwellings and build out rates of 70 dpa are not supported by credible evidence. The use of these defaults in the calculation are therefore unsound as they are not based on proportionate evidence.

2.35 A large number of the smaller sites in Appendix B of the 5-Year Deliverable Housing Land Supply Statement (SDEB27) may have permissions which will have lapsed by the time of the Examination.

Q5.8. Has the Council provided clear evidence that a total of 2,833 dwellings will be completed on sites of 10 or more dwellings with outline planning permission, sites with a grant of planning permission in principle, and allocations without planning permission by 31 March 2024?

2.36 No. The nature of the evidence required extends beyond that presented in the Residential Land Availability Report (SDEB26) and in the 5-Year Deliverable Housing Land Supply Statement (SDEB27). The Framework requires “clear evidence” that a site is deliverable, not just assertions from the Council. The PPG (reference ID 68-007-20190722) provides an illustration as to what may constitute clear evidence. This can include, for example, a written agreement between the Local Planning Authority and the site developer which confirms the developers’ delivery intentions and anticipated start and build-out rates. While these may be available for some sites it is important that they are included as part of the evidence base so that the evidence can be suitably examined. At present, the Residential Land Availability Report (SDEB26) and the 5-Year Deliverable Housing Land Supply Statement (SDEB27) only refer to such evidence in some cases. It is therefore not possible at the present time to reach any conclusion on the 5 year land supply position and it simply cannot be integrated in the manner required.

2.37 In respect of the sites which form part of the supply which we are representing we can confirm that our clients would be willing to enter into an agreement setting out the following for site allocations refs. 040, 432 and 170;

- Site 040 (Land off Sheffield Road, Conisbrough) is not referenced in Appendix D (SDEB27). Notwithstanding this, DLP is able to confirm that the site remains available, developable and deliverable for residential development (further details provided in the Regulation 19 representations for the site). Also, the representor has a contract with a major housebuilder and the terms of an option are agreed. Further
to this, as referenced in further detail in the Regulation 19 representations for the site, the site has an indicative capacity of at least 234 units, and development of all of the units is achievable in 0 – 5 years.

- Site 432 (Former Wheatley Hills Middle School, Leger Way) is referenced in Appendix D (SDEB27). Full planning permission was granted in January 2020 for 143 units (App ref: 19/01170/FULM) and Avant Homes are currently progressing the required discharge of conditions applications.

- Site 170 (Land at Doncaster Road, Hatfield) is referenced in Appendix D (SDEB27 and the site is subject to a live full planning application for 72 units. The site is deliverable, and Avant Homes are committed to bringing the site forward, with a decision on the application anticipated from Planning Committee in September 2020.

Q5.9. Is the inclusion of a windfall allowance of 1,000 dwellings in the five year supply from 1 April 2019 justified? Would there be “double counting” with some of the 4,886 dwellings on sites with full or outline planning permission on 1 April 2019?

2.38 Yes. The supply already includes a large number of small sites which are identified to come forward in the first five years (in fact, all small sites appear to be forecast to come forward in the next five years).

2.39 Further to the above, in the Council’s response to PQ26 about what the justification is for not including a windfall allowance they state that there is “strong evidence for a windfall allowance based on historic delivery, but very little in the way of evidencing a potential future supply from specific sites in the HELAA”.

2.40 In light of the above, it is unclear why the Council have then included a windfall allowance of 1,000 dwellings in their response to PQ29 (in the 5-Year Deliverable Housing Land Supply Site Analysis). Further to this, paragraph 70 of the NPPF states that “where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply”. Therefore, given that the Council have acknowledged that they have very little in the way of evidencing a potential future supply from specific windfall sites in the HELAA, it is not considered to be justified to include a windfall allowance of 1,000 dwellings in the five year supply.
Issue - Housing Trajectory

Q5.10. Does Figure 3 in the Plan set out a justified and effective housing trajectory?

2.41 No. Paragraph 4.78 in the publication version of the draft Local Plan states that “Figure 3 shows the housing trajectory for the plan period based on allocated supply through the Local Plan and is exclusive therefore of any windfalls, supply from small permissioned sites across the borough, and any commitments at the Defined Villages, nor does it account for any housing in line with Policy 3 at the Airport”. Figure 3 (the trajectory) is then a bar chart which includes allocations supply (excluding any housing in line with policy 7), planning permission supply sites 5+ units remaining (excluding Defined Villages and 1 – 4 unit permissions), and actual net completions (for the first 3 years), against the Local Plan allocation requirement and the standard methodology Local Housing Need requirement.

2.42 Part of the difficulty with engaging with the Plan is that there is not a detailed year by year trajectory for each site, although such work must be the basis for the published trajectory. The trajectory therefore is unsound as there is not the evidence available to justify it.

Q5.11. Does the trajectory demonstrate that the Plan will be effective in ensuring that there will be a supply of specific deliverable sites sufficient to meet an appropriately calculated five year requirement when the Plan is adopted and thereafter?

2.43 Figure 3 illustrates that from 2025/6 onwards the Plan will deliver less than the annual requirement. As the NPPF and PPG do not suggest that over provision can be discounted from future need, this trajectory suggests that there will not be a rolling 5 year land supply. There is a strong reason why one should not count completions in the past to meet future needs, most obviously because if a greater number of dwellings were required to meet the needs of the population they are not available to meet future needs that are arising.

2.44 Other Local Plans produce not only a detailed trajectory based on assumptions regarding each individual site but also a rolling average of five year land supply for the whole of the Plan period. It would appear if this were to be done there would not be a 5 year land supply from 2025/6 onwards.

Issue - Policy 2 Part 5: If a Five Year Supply Cannot Be Demonstrated

Q5.12. Is the approach set out in policy 2 part 5 to allowing development adjacent to the Development Limits of the Main Urban Area, Main Towns, and Service Towns and Villages if a five year borough-wide supply of housing land cannot be demonstrated justified and consistent with national policy?
2.45 The NPPF paragraph 11 and footnote 7 sets out that, for applications involving the provision of housing, ‘out-of-date’ includes situations where the Local Planning Authority cannot demonstrate a five year supply of deliverable housing sites or where the Housing Delivery Test indicates that the delivery of housing was substantially below the housing requirement over the previous three years.

2.46 Policy 2 part 5 of the publication version of the draft Plan sets out that residential development will be supported in the countryside providing it meets a set or criteria including “exceptional circumstances”.

2.47 If there is no 5 year supply then this policy would be one which would be out of date. Notwithstanding that, it should be worded such that if there was a requirement to release land to meet a five year land supply then exceptions to the policy could be made. These would not be “exceptional circumstances” but simply development management considerations.
## Appendix 1  Sites not started but with lapsed consents

<table>
<thead>
<tr>
<th>Reference</th>
<th>Address</th>
<th>Proposal</th>
<th>Lapse Date</th>
<th>Proposed Units - Gross</th>
<th>Proposed Units - Net</th>
</tr>
</thead>
<tbody>
<tr>
<td>18/02006/REMM</td>
<td>Former Rossington Colliery, West End Lane, New Rossington, Doncaster, DN11 0PZ</td>
<td>Details of appearance, landscaping, layout and scale for the erection of 184 dwellings (being matters reserved in previously approved application 12/01107/OUTA)</td>
<td>30/11/2020</td>
<td>184</td>
<td>184</td>
</tr>
<tr>
<td>17/01099/REMM</td>
<td>Land Off White Lane, Thorne, Doncaster</td>
<td>Details of appearance and landscaping for the erection of 79 dwellings on approx. 2.48ha of land. (being matters reserved in outline application previously granted permission under ref 15/02275/OUTM granted on 30.01.2017).</td>
<td>22/11/2019</td>
<td>79</td>
<td>79</td>
</tr>
<tr>
<td>17/01446/REMM</td>
<td>Land On The North East Side Of Alexandra Street, Thorne, Doncaster, DN8 4EY</td>
<td>Details of access, appearance, landscaping and scale for the erection of 28 dwellings on approx. 0.72ha of land. (being matters reserved in outline application previously granted permission under ref 14/01833/OUTM granted on 10.02.2017).</td>
<td>07/12/2019</td>
<td>28</td>
<td>28</td>
</tr>
<tr>
<td>12/02053/FULM</td>
<td>Tadcaster Arms Hotel, Doncaster Road, Armthorpe, Doncaster</td>
<td>Erection 9 no. retail units and 22 no. apartments in two blocks with associated parking, servicing space, cycle storage and bin storage on approximately 0.33 ha of land following demolition of existing public house and hairdressing salon.</td>
<td>24/02/2020</td>
<td>22</td>
<td>22</td>
</tr>
<tr>
<td>14/01584/FULM</td>
<td>Land Off Site Of Former Rising Sun Public House, Hatfield Road, Thorne, Doncaster</td>
<td>Erection of 14 dwellings following demolition of public house and buildings on approx 0.48 ha of land</td>
<td>07/07/2019</td>
<td>14</td>
<td>12</td>
</tr>
<tr>
<td>15/02857/FULM</td>
<td>The Highwoods, Elm Road, Mexborough</td>
<td>Erection of two storey building with rooms in roof space comprising 2 retail units, A5 unit at ground floor with 13 flats above - following demolition of existing public house</td>
<td>03/08/2019</td>
<td>13</td>
<td>13</td>
</tr>
<tr>
<td>16/01168/FULM</td>
<td>Land To North Of Gowdall Green, Bentley, Doncaster</td>
<td>Erection of 2 houses and a block of 8 flats.</td>
<td>05/01/2020</td>
<td>10</td>
<td>10</td>
</tr>
<tr>
<td>17/01145/COU</td>
<td>1 Scot Lane, Doncaster, DN1 1EW</td>
<td>Change of use of first and second floors to form 10 No. HiMO bedrooms.</td>
<td>30/06/2020</td>
<td>10</td>
<td>10</td>
</tr>
</tbody>
</table>