Examination of the Doncaster Local Plan

Council Hearing Statement

Matter 5.
Housing Supply

September 2020
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\(^1\) justified and consistent with national policy and guidance?

1. Yes, the Council believes that the approach to site selection has been justified and is consistent with national planning policy. One of the first documents the Council consulted on (November 2015) as part of the new Local Plan was the Housing & Employment Site Selection Methodology\(^2\) which also included mixed-use sites. The Methodology was prepared in line with the then 2012 NPPF\(^3\), PPG\(^4\) and other best practice guidance as identified in the document. A number of changes were made to the methodology to address consultation responses. The methodology has been reviewed in line with the 2018 NPPF\(^5\) and all relevant PPG. The methodology was used to identify draft housing allocations for the 2018 consultation\(^6\), and then again for the proposed allocations in the Publication version\(^7\) of the plan which are in line with section 5 of the NPPF. In particular, paragraph 67 of the NPPF, the methodology has facilitated the local plan to identify specific deliverable sites for years 0-5 of the plan period, followed by specific developable sites for years 6-10, and 11-15 of the plan.

2. The Methodology sets out a 7-stage process to ensure the local plan identifies a sufficient supply of sustainable sites and takes into account the findings from: HELAA\(^8\); the Green Belt Review\(^9\); Flood Risk Sequential Test\(^10\); SA\(^11\); Viability\(^12\); and any other relevant technical matters, such as access and highways. All of the respective evidence base documents have been prepared in line with NPPF/PPG and any other relevant best practice. It therefore draws on numerous evidence bases, but ensures a summary of each, including how it has informed decisions in respect to housing sites at each stage, is set out in a single document. The methodology runs through the process stage by stage and includes a non-technical summary at each which, in particular, was provided to assist with the initial consultation on the methodology itself in 2015, followed by the 2018 consultation\(^13\) and the sites which it identified as preferred options.

3. All site options capable of providing 5+ dwellings have been appraised for housing and the methodology filters out some sites at each stage, for example sites not capable of contributing towards the spatial strategy, or

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\(^1\) SDEB46 Site Selection Methodology
\(^2\) SDEB46 Site Selection Methodology
\(^3\) OTH40 NPPF 2012
\(^4\) OTH41 Planning Practice Guidance
\(^5\) For completeness, it is not considered that the changes to the February 2019 NPPF had a material impact on the methodology
\(^6\) AE04 Draft Policies and Proposed Sites Consultation (2018)
\(^7\) CSD3 Doncaster Local Plan 2015-2035 Regulation 19 Publication Version
\(^8\) SDEB45 Housing and Employment Land Availability Assessment
\(^9\) SDEB15.3.1 Green Belt Review Stage 3 - Part 1; SDEB15.3.2 Green Belt Review Stage 3 - Part 2; SDEB15.4 Green Belt Review Stage 3 Addendum
\(^10\) SDEB13 Strategic Flood Risk Assessment Level 1
\(^11\) CSD7.1 Sustainability Appraisal Report 2019
\(^12\) SDEB48.1 Whole Plan Viability Testing 2019
\(^13\) AE04 Draft Policies and Proposed Sites Consultation (2018)
where sites failed the flood risk sequential test. A clear reason(s) for why sites have been filtered out (including at which stage) is provided, and the final section concludes why sites have been either allocated, or rejected for those that stayed in the process through to stage 7. A supporting settlement summary has also been produced for both the 2018 consultation\(^\text{14}\) and for Publication\(^\text{15}\).

4. The Local Plan identifies a good mix of sites in terms of both size and type. There are 98 sites <1ha in size allocated through the plan that amount to 1,271 units. Overall, 37% of the total supply from permissions and allocations (5+ units) of 18,221 dwellings are on brownfield land (6,714 dwellings). The main reason why the brownfield allocation is not higher is due to the prevalence of flood risk, particularly at the Main Urban Area in which numerous sites failed the sequential test\(^\text{16}\).

5. Small sites below the PPG HELAA threshold of 5+ dwellings have been appraised through a slightly different and separate exercise through the Development Limits work\(^\text{17}\), albeit a summary is also included in the Housing Site Selection Methodology document for completeness\(^\text{18}\).

**Overall supply for the Plan period 2015 to 2035**

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>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:</td>
<td>a) 9,289 new homes being built on allocations with planning permission at 2018?</td>
</tr>
<tr>
<td>6. Yes. Planning permissions have been assessed for their deliverability and yield through various evidence base documents(^\text{19}). There has been some discounting of capacity where latest evidence shows the permissioned supply cannot be demonstrated at the current time, and/or, a delayed and revised build-out for some sites to reflect where permissions have not come forward as quickly as envisaged. 1 very large site is also discounted to allow for delivery beyond the plan period(^\text{20}).</td>
<td></td>
</tr>
<tr>
<td>7. By way of example, excluding commitments at the Defined Villages (as this supply is included as part of Question 5.2b below) the HELAA 2018 (Housing Sites Excel Spreadsheet)(^\text{21}) shows there were extant permissions in place on sites 5+ units for 12,218 net dwellings as at 1st April 2018 (i.e. the same base date as the allocations supply in the Local Plan). This</td>
<td></td>
</tr>
</tbody>
</table>

\(^\text{14}\) AE04 Draft Policies and Proposed Sites Consultation (2018)

\(^\text{15}\) SDEB47 Site Selection Settlement Summaries

\(^\text{16}\) This is an amendment to Figure 53 DMBC4 Topic Paper 4 - Housing. The brownfield allocations total has been revised, largely as Unity (site 418) was mistakenly included as a brownfield site in DMBC4, when it is a greenfield site.

\(^\text{17}\) See Sections 1.5 & 1.6 of SDEB1 Identifying Development Limits

\(^\text{18}\) See Stage 2 of SDEB46 - Site Selection Methodology

\(^\text{19}\) such as SDEB45 Housing and Employment Land Availability Assessment and SDEB27 Five Year Housing Land Supply (April 2019-March 2024)

\(^\text{20}\) See Section 7.11 of DMBC4 Topic Paper 4 - Housing

\(^\text{21}\) SDEB45 Housing and Employment Land Availability Assessment
figure is to be compared with the 9,289 units identified as coming forward on these same permissioned sites, this demonstrates a discounting of 2,929 dwellings for non-delivery in the plan period (24%) from commitments and shows a realistic and robust approach to the likely delivery of committed sites.

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

8. Yes. This supply of 585 net units comprises of 2 main sources. Firstly, commitments at the Defined Villages from six permissioned sites 5+ units remaining. These sites are not allocated in the plan as they are not in the top tiers of the spatial strategy, but equate to 83 net dwellings.22 The 2019 Residential Land Availability monitoring identifies that, of this supply, 49 of the units are sites under construction and the remaining 26 units are found on sites that have detailed extant permissions and, in line with the NPPF definition, are deliverable as at 1st April 2019. The second source is commitments on small sites (1-4 net units) throughout the Borough which identifies 385 sites equating to 502 net units.24 Again, in line with the definition in NPPF, these small sites are deliverable.

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

9. Yes. All allocations in the plan have been promoted through the Local Plan process. Evidence of availability and achievability of sites has been provided by landowners, developers and their agents as part of the ‘call for sites’ stage. Subsequent consultation responses and representations have also provided supporting evidence of site availability, indicative schemes and capacities, and build out rates. Such information from site promoters has been critically assessed by the Council as part of the process.

10. Allocations have also been assessed in terms of their achievability and plan period contribution through the evidence base as well as further appraisal of capacity and yield, including factoring in constraints, as part of the Housing Site Selection Methodology26 and SA. Site yields, densities, and build-out rates are based on an agreed HBF Stakeholder methodology as part of the HELAA. The Council’s own review of such assumptions, from looking at several years of permissioned sites, generally supports such expectations around density and build-out rates for different types of site in different geographical locations of the Borough. Of the 52 allocations identified in the plan, around 15 have

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22 See Section 7.22 of DMBC4 Topic Paper 4 - Housing
23 SDEB26 Residential Land Availability Report 2018-19
24 See Section 7.18 of DMBC4 Topic Paper 4 - Housing
25 Such as SDEB45: Housing and Employment Land Availability Assessment and SDEB27 - Five Year Housing Land Supply (April 2019-March 2024)
26 SDEB46 Site Selection Methodology
27 CSD7.1 Sustainability Appraisal Report 2019
28 SDEB45 Housing and Employment Land Availability Assessment
29 See Sections 7.4 – 7.6 of DMBC4 - Topic Paper 4 - Housing
since progressed with planning applications to varying degrees, and 10 sites also now have consents/approvals subject to S106. The capacities for schemes that have progressed towards/through Planning demonstrate that the indicative yields identified through evidence such as HELAA are justified, robust, realistic, and achievable i.e. the sites with permission generally reflect the assumed HELAA capacity.

11. The vast majority of the allocations are relatively small-medium in size. The majority are not reliant on the delivery of significant new infrastructure upfront and are mostly identified as being developed in the earlier phases of the plan period\textsuperscript{30}. The nature of the allocations means that even if some come forward less quickly than envisaged, we can still have confidence that their contribution to planned housing needs will be realised during the plan period. Only 1 very large site (Site Ref: 836 - Carr Lodge, Woodfield – 1,131 units in total) has been discounted to allow for delivery beyond the plan period\textsuperscript{31}. The next largest allocation in the plan is nearly 50% smaller at 600 units. The following table (Table 5.2c) provides a brief summary and shows allocations are generally small-medium in size and of the scale up to 200 dwellings.

Table 5.2c: Breakdown of Housing Allocations by Size

<table>
<thead>
<tr>
<th>Site Size (Units)</th>
<th>No of Allocations</th>
<th>Total Plan Period Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>5-14 units</td>
<td>2</td>
<td>20</td>
</tr>
<tr>
<td>15-49 units</td>
<td>19</td>
<td>562</td>
</tr>
<tr>
<td>50-99 units</td>
<td>12</td>
<td>889</td>
</tr>
<tr>
<td>100-199 units</td>
<td>10</td>
<td>1,362</td>
</tr>
<tr>
<td>200-299 units</td>
<td>3</td>
<td>682</td>
</tr>
<tr>
<td>300-399 units</td>
<td>2</td>
<td>593</td>
</tr>
<tr>
<td>400-499 units</td>
<td>1</td>
<td>400</td>
</tr>
<tr>
<td>500-599 units</td>
<td>1</td>
<td>542</td>
</tr>
<tr>
<td>600-699 units</td>
<td>1</td>
<td>600</td>
</tr>
<tr>
<td>700 units+</td>
<td>1</td>
<td>980</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>52</strong></td>
<td><strong>6,630</strong></td>
</tr>
</tbody>
</table>

12. Some representations have stated that the Local Plan trajectory for their site, in particular current Green Belt sites which are not identified as coming forward until phase 2 of the plan period, can deliver sooner than this once the policy constraint is overcome through adoption of the Local Plan. There are no phasing policies in the Local Plan (unlike the current Core Strategy Policy CS10\textsuperscript{32}) and all sites are available upon conclusion of the plan being found ‘sound’. There are no policy constraints in the Local Plan therefore that would cause any issues in respect to sites coming forward sooner than identified through Policy 6 and the indicative trajectory set out in the supporting tables in Chapter 16.

\textsuperscript{30} See Figure 3 (Local Plan Housing Trajectory) of CSD3 - Doncaster Local Plan 2015-2035 Regulation 19 Publication Version
\textsuperscript{31} See Section 7.11 of DMBC4 Topic Paper 4 - Housing
\textsuperscript{32} OTH3 Adopted Core Strategy Development Plan Document
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?

13. No. As drafted, Table 5 is clear that windfalls will be an additional supply over the plan period, but does not express an anticipated supply from such a source. NPPF paragraph 70 is clear that where an allowance is being made from windfall sites, there should be compelling evidence that this source will provide a reliable supply, and the allowance should be realistic having regard to not just historic delivery, but also regard to the HELAA and expected future trends.

14. Looking at the historical evidence, windfalls have always made up a substantial supply of housing delivery in the borough, averaging 496dpa over the 20-year period immediately after adoption of the UDP (1998-2008)\(^3\). This shows that even following the period of having a recently adopted/ up-to-date development plan, i.e. the point where you would expect completions and supply from allocated sites to far outstrip windfalls, there has always been a healthy windfall supply which reflects the size of the borough and the numerous range and size of settlements within it. In just a single of those 20 monitoring years (2001/02) did the supply from windfalls equate to below 200dpa, with most delivering far in excess of this and the average for the 20-year period. The Council expects such a trend will continue, but that the supply from windfalls post-adoption of the Local Plan is likely to see a reduction in windfall supply for at least the early years/phases of the plan period.

15. In respect to the HELAA and expected future trends, then the 2018 Update report\(^34\) has been reviewed in terms of the deliverable/developable supply. Once sites that are already allocated in the plan are removed, and any sites where there is likely to be a policy objection (for example sites that are designated as Employment Policy Area, Public Open Space, or Green Belt) then relatively few sites remain. Table 5.3a below is a brief summary of the identified supply from the 2018 HELAA.

Table 5.3a: HELAA Summary of Sites Not Allocated in the Local Plan (exclusive of Green Belt sites and sites with local policy constraints)

<table>
<thead>
<tr>
<th>Total Number of sites</th>
<th>25</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Capacity of sites (units)</td>
<td>456</td>
</tr>
<tr>
<td>Of which failed Local Plan flood risk sequential test (FZ2/3 and/or significant surface water flooding – see stage 5 of site selection methodology(^35)) (Units)</td>
<td>195 (43%)</td>
</tr>
<tr>
<td>Of which were not supported as allocations due to access concerns - see stage 6 of site selection methodology (Units)</td>
<td>36 (8%)</td>
</tr>
</tbody>
</table>

\(^33\) see section 7.19 on page 119 of DMBC4 Topic Paper 4 Housing for further details and analysis

\(^34\) SDEB45 Housing and Employment Land Availability Assessment

\(^35\) SDEB46 Site Selection Methodology 2019
16. In other words, the Local Plan has allocated the vast majority of urban sites that would otherwise have been a source of potential windfalls in the future in efforts to comply with wider national policy objectives, such as efficient use of land, using previously developed land, avoiding loss of Countryside/ Green Belt, loss of agricultural land, and so forth. The main factor for why 43% of the 456 units identified above have not been allocated is that they failed the flood risk sequential test. Their ability to come forward as windfalls in the future therefore rests entirely on compliance with Local Plan Policy 58 part C (as well as any other relevant policies in the plan) which could be difficult in the context of an up-to-date Local Plan that allocates sequentially preferable sites that may not be taken up until well into the plan period at some settlements. The other sites have also been considered, but not taken forward as allocations due to matters such as access (more detailed technical assessment by Highways colleagues compared to HELAA assessment) as well as wider sustainability and spatial planning objectives, such as protecting Local Wildlife Sites and unacceptable loss of trees.

17. In addition to the above, in the Council’s experience, sites that are typical windfall sites are not put forward by land owners through the development plan/HELAA process as such sites can generally be redeveloped when the timing suits the landowner, and depending on their personal circumstances. Not having an allocation in the plan is not necessarily an impediment to a successful planning application, and there is little incentive for such site owners to make sites known/available to the Council for consideration. This is evidenced by the fact that, of the supply identified above, 69% of the total units is on sites that have been promoted to the Local Plan process by Doncaster Council (Assets & Strategic Housing Departments) as opposed to private landowners.

18. In conclusion, the above summary highlights that there will be windfalls during the plan period, but it is not possible to be confident as to the exact timing and numbers from such a source. Although the Council is not relying on windfalls they will remain a source of supply

b) 290 windfalls at Defined Villages?

19. No. The potential supply of up to 290 dwellings from small site extensions to the ‘Defined Villages’ in line with Policies 2 and 3 are subject to suitable sites coming forward in ‘appropriate locations’ (as defined) and in ‘exceptional circumstances’ (as defined). It is not possible therefore to say categorically that all, or some, of this supply will be realised over the plan period. Any supply from this source will depend on landowner intentions and the ability for sites, where available, to comply with the policy, which includes demonstration of clear community support. Further to this, it is clear that areas, or sites, at risk of flooding (Flood Zone 2 and 3) are not considered as ‘appropriate locations’ for the purposes of this policy. Of the
14 Defined Villages where the policy could apply, all of them have some degree of flood risk constraint given they are located in the eastern non-Green Belt ‘half’ of the Borough where there is a high prevalence of flood risk constraint. Some villages may therefore have limited, and in some cases may not have any, ‘appropriate locations’ for the policy to apply unless a future update to the EA Flood Map for Planning results in changes to Flood Zone 1.

c) 197 new homes on windfalls on sites identified in the brownfield register 2019?

20. No. The 197 units is made up of 17 sites; 15 that are now permissioned and 2 sites which have applications pending at the time of drafting. This is based on the 2019 Brownfield Land Register, which is a different base date (1st April 2019) compared to the one used in the Local Plan (1st April 2018). The Council therefore accepts that this source of supply will overlap with the windfall supply of 200dpa, and as per the response to Question 5.3a above. If the Council used the 2018 Brownfield Register for supply purposes then, given the Register uses the same 5+ net units as per the guidance for allocations, and Registers identify permissioned sites as suitable for inclusion, then this supply will already have been accounted for in the permissioned allocated supply i.e. as per that set out in respect to Question 5.2a above already so would be double counting.

d) New homes at Doncaster Sheffield Airport?

21. No. The approach to the Airport is set out through Policy 7 and Appendix 3 of the Local Plan. The Airport sits outside of the Local Plan’s spatial strategy and settlement hierarchy (Policy 2) and its Level and Distribution of Growth (Policy 3). Allocations have been made in line with this overall approach and sufficient to meet the requirement and distribution, as per these policies. Policy 7 has been derived to support the growth of the Airport, which is a regional asset and priority, and is broadly in line with the draft Airport Masterplan 2037. With the exception of the first tranche of 280 dwellings on the allocated site (ref: 940 E2) the site of the remaining 920 dwellings (ref 940 E3) are entirely conditional on jobs being created at the Airport first, and as per the mechanism in Appendix 3 of the Local Plan. Given the Airport housing sits outside of the settlement strategy, and housing is generally tied to significant job creation, it would not be justified to include this supply towards the Borough’s overall supply for the plan period. See also the Council’s response to Matter 10: Doncaster Sheffield Airport, in particular Question 10.2.

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

22. No. Given the responses to Question 5.3a-d above, the Council has not made an allowance from these sources during the plan period towards the overall housing requirement. The Local Plan has resisted an additional allocation buffer, unlike some Local Plan’s that add say 20% for choice,

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36 OTH53 Doncaster Sheffield Airport Masterplan 2018-2037 Draft Consultation Report March 2018
flexibility, non-delivery etc. Reducing the scale of allocations due to assumptions around such potential sources of supply would remove the buffer and therefore likely result in the need to allocate additional sites (or the same sites) to provide confidence again that sufficient housing supply will come forward. To illustrate this point further, and by way of example, should the supply from windfalls (3,400 units) and the initial tranche of housing at the Airport (280 units) come forward during the plan period this itself would represent 20% of the overall plan period housing requirement of 18,400 (3,400 + 280 = 3,680).

23. It is also noted that a common response from the industry representations is that the plan is ‘unsound’ due to not identifying additional allocations as part of a buffer. The Council has not made any attempts to reduce allocations due to anticipated supply from other sources therefore, but expect some of this supply to come forward which provides part of the flexibility for any non-delivery on allocated sites and ensures the housing requirement will be met over the plan period.

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?

24. Yes. The Council agrees that Table 5 as drafted (and the explanatory text at paragraphs 4.73, 4.76 and 4.77) could be improved through Main Modifications to the plan to make explicitly clear what the total housing supply is for the plan period 2015 – 2035, as well as potential other sources of supply as follows. Please note, pages 5-7 of the Council’s Schedule of Suggested Main Modifications to date already identify a number of amendments to the figures in these paragraphs and Table 5. For completeness, the below includes any such amended figures for ease of reference.

4.73 Of the settlements identified for an indicative housing allocation in Policies 2 and 3, 127 sites with planning permission with a combined capacity of 9,318 149 dwellings have been found through the Housing and Employment Land Availability Assessment 2018 (HELAA) to be deliverable and/or developable in the first 15 years. Two very large permissioned sites (418 - Unity) has are also been found to still be delivering in the last 2 years of the plan period (and even beyond in one case) with an additional supply of 230 140 dwellings in years 2033-2035 of the plan period. Permissions that had not formally commenced as at 1st April 2018 have all been assessed through the Site Selection Methodology (2019) as meeting the sustainability objectives and Local Plan objectives. They are therefore allocated to help deliver the housing requirement. In summary, the plan period supply from permissioned sites 5+ net units remaining equates to 9,289 dwellings (with a further supply beyond the plan period of 2,085 dwellings).

4.76... Additional to the supply from permissions, the Local Plan makes a further 52 housing allocations that equates to a total capacity of

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37 DMBC15 Doncaster Local Plan 2015-2035 Councils Suggested Main Modifications 4 June 2020
6,718,837 dwellings, of which the vast majority (6,350 units) are within the first 15 years. A further 28017 dwellings are anticipated during the last 2 years of the plan period with the remaining 151,207 units falling beyond the plan period. **The plan period supply from allocations without permission totals 6,630 dwellings (with a further 207 dwellings beyond the plan period)**

4.77 Combined with the supply from permissioned sites, the Local Plan identifies 15,668,499 new dwellings in the first 15 year period of the plan (2018-2035). However, this total does not account for some settlement’s supply being higher than the requirement set out in Policy 3. When supply from allocated sites is capped at the top of the range for the Main Towns (or in the case of the Service Towns and Villages where the local housing need target is met) the capacity equates to 13,405,236 new dwellings compared to the 15 year residual allocation requirement of 13,235. Uncapped supply equates to a further 2,2632 dwellings during the 15-year allocated period. A further 42047 new homes are anticipated during the last 2 years of the plan period from 3 allocated sites. and

Furthermore, there is a supply beyond the plan period of 2,29236 units (usually very large sites that are estimated will not completely build out in the plan period) but it is possible that this additional capacity could come forward sooner. The combined capacity of Allocations from Tables H1 & H2 = 18,351211 which is 212% over and above the residual housing requirement of 15,000.

**Table 5: Summary of Housing Requirement and Supply Position**

<table>
<thead>
<tr>
<th>Source</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>A Net Completions 2015 - 2018</td>
<td>3,400</td>
</tr>
<tr>
<td>B Allocations from Permissions (Table H1) 2018 – 35</td>
<td>9,289</td>
</tr>
<tr>
<td>C New Allocations (Table H2) 2018 - 35</td>
<td>6,630</td>
</tr>
<tr>
<td>D Permissions as at 01/04/2018 not included in allocated supply</td>
<td>585</td>
</tr>
<tr>
<td>E Post plan period supply from permissions (Table H1) 2035 +</td>
<td>2,085</td>
</tr>
<tr>
<td>F Post plan period supply from allocations (Table H2)</td>
<td>207</td>
</tr>
<tr>
<td>G Reserve Site Capacity</td>
<td>1,438</td>
</tr>
<tr>
<td>H Windfall supply (200dpa x 17 years)</td>
<td>3,400</td>
</tr>
<tr>
<td>I Doncaster Sheffield Airport total potential capacity (Policy 7)</td>
<td>1,200</td>
</tr>
<tr>
<td>J Countryside Defined Villages Potential Capacity</td>
<td>290</td>
</tr>
</tbody>
</table>

- Total plan period supply from sites with permission and sites without permission (B+C+D) = 16,504
- Total plan period supply (A+B+C+D) = 19,904
- Total post plan period supply (E+F) = 2,292
- Total potential capacity from other sources (G+H+I+J) = 6,328
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?

25. Yes, as set out in the Council’s response to PQ31, the Local Plan allocations and 2019 Brownfield Register are in conformity with NPPF paragraph 68 in respect to identification of small sites less than 1 hectare in size with 13% of the requirement (top of the range) being found on small sites. The Council’s view is that it is necessary to make Main Modifications to paragraph 4.81 of the Local Plan, and as set out in the response to PQ31 and as per page 6 of the Councils Suggested Main Modifications (4 June 2020). This represents the most up-to-date and factual position due, primarily, to the publication of the 2019 Brownfield Register since Regulation 19 stage meaning the existing text is already time expired.

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?

26. Yes. The Council has set out its response as to why it concludes the approach is consistent with national policy as part of the response to Matter 2: Quantity of Development needed in the Borough, and more specifically in response to Question 2.5 in respect to the overall housing requirement for the plan period. The Council’s view is that the approach would be effective in helping to ensure that the need for homes identified in the plan will be met as also set out in the response to that question.

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?

27. No. NPPF is clear that sites less than 10 units with Outline or Full planning permission, or sites 10+ units in size with detailed permission are considered as being deliverable until permission expires, or unless there is clear evidence to the contrary such as they are no longer viable. The Council’s 5-Year Housing Land Supply Statement, covering the

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38 DMBC7 Doncaster Council Response to Preliminary Questions - 2nd June 2020
39 DMBC15 Doncaster Local Plan 2015-2035 Councils Suggested Main Modifications 4 June 2020
41 See paragraph 1.7 on page 4 of SDEB27 Doncaster 5-Year Deliverable Housing Land Supply Statement 2019-2024
period 2019-2024, sets out the relevant parts of NPPF/PPG in respect to the definition of deliverability and how this can be.

28. Sites that fall into the above categories are set out at Appendix A and B of the 5-year supply statement. These tables show the total remaining capacity from these sites for each tier of the settlement hierarchy, followed by the site’s status, and 5-year supply yield which demonstrates that there has been significant discounting of capacity. Please note, the Council’s 5-Year Housing Land Supply Statement does not separate out the Outline permissions 10+ units (category ‘c’ in the Matters & Issues Questions) in Appendix A. It should also be noted that the 5-year deliverable supply has also been subject to a 10% non-delivery allowance for sites in this category and is considered to be generous. Given the recent Government announcement, as part of the response to Covid-19, that certain planning permissions due to lapse will automatically be extended to 1st May 2021, this is likely to lead to an even lower lapse rate in the near future than the 10%.

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?

29. Yes. The Council’s 5-Year Housing Land Supply Statement, covering the period 2019-2024, sets out the relevant parts of NPPF/PPG in respect to the definition of deliverability and how this can be evidenced. The PPG states that plan-makers can use the Housing & Economic Land Availability Assessment (HELAA) to demonstrate the deliverability of sites. The Council’s HELAA methodology sets out assumptions around lead-in times from Outline permission to Reserved Matters and commencement, as well as build-out rates depending on site size and number of developers on site, and so forth. The methodology was agreed with the Housing Stakeholder Group which included representatives from the Home Builders Federation as well as other stakeholders. In particular, see section 6.2.8 on page 17 of the April 2015 (published December 2016) HELAA for the methodology as this has not been repeated in the future annual HELAA updates in the interests of brevity. In addition to this, the Housing Topic Paper includes analysis and evidence of recently achieved build out rates based on the annual monitoring and a summary of the HELAA lead-in times (pages 79-80).

30. Sites of 10+ dwellings with outline permission – Appendix 1 A of the Council’s 5-Year Deliverable Housing Land Supply Statement includes further details for the 8 sites that contribute towards this supply. In line with the above, the HELAA methodology has been applied in respect to lead-in times for detailed planning and starts/completions on site as well,
unless otherwise stated e.g. evidence provided as part of a Public Inquiry. Progress towards Reserved Matters and/or towards provision of any significant infrastructure required has also been set out where relevant. Likewise, evidence provided from any Regulation 19 representations from agents/developers/landowners has been used and briefly summarised in this Appendix.

31. Sites with grant of planning permission in principle – as at 1st April 2019 there were 206 units that fell into this category. As alluded to above, the Council has only included in the deliverable supply the 119 units from the eight sites that were already under construction based on the Council’s annual monitoring. Appendix C of the Council’s 5-Year Housing Land Supply Statement includes a summary of this supply. As well as these sites being under construction, some have already had completions recorded during the previous 2018/19 monitoring year.

32. Allocations without planning permission - Appendix D of the Council’s 5-Year Deliverable Housing Land Supply Statement includes further details for the 27 sites that contribute towards this supply. In line with the above, the HELAA methodology has been applied in respect to lead-in times for planning and starts/completions on site, unless otherwise stated. Progress towards planning permission, where relevant, is also identified. This includes a number of Doncaster Council led affordable housing schemes and land disposals to the market as part of the comprehensive Assets Review Programme. Likewise, evidence provided from any Regulation 19 representations from agents/developers/landowners has been used and briefly summarised in this Appendix.

33. In conclusion, the above is a summary, with signposts to the further relevant detail, and demonstrates that there is clear evidence that the sites are available now, offer a suitable location for development now, and are achievable with a realistic prospect that the capacity identified as contributing towards the 5-year supply will be delivered by 31st March 2024.

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?

34. The Council considers a windfall allowance of 1,000 dwellings (or 200dpa) for the purposes of 5-year deliverable land supply is justified. The Council’s response to Question 5.3a, and the Housing Topic Paper, shows that the Borough has always delivered well above 200dpa from windfalls for the last 20 years with the exception of a single year in 2001/02 which was a very low housing completion year from all sources with just 316 gross units built. Between 2014-2018, an average of 758 dwellings have been

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48 SDEB26 Residential Land Availability Report 2018-19
49 SDEB27 Doncaster 5-Year Deliverable Housing Land Supply Statement 2019-2024
50 SDEB27 Doncaster 5-Year Deliverable Housing Land Supply Statement 2019-2024
51 SDEB45 Housing and Employment Land Availability Assessment
delivered on windfall sites, with an average of 496 units for the longer 20-year period of 1998-2018 i.e. even after adoption of the new Unitary Development Plan\textsuperscript{53} in 1998 windfalls have been a consistent supply of housing.

35. The 5-year Housing Land Supply Statement\textsuperscript{54} covering the period 2019-2024, makes clear in the summary Table on page 6 that the windfall contribution of 200dpa is a discounted figure to avoid double counting with extant small permissions and, as identified above, is considered as being cautious.

**Housing trajectory**

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

36. The housing trajectory in the Local Plan\textsuperscript{55} is a simple visual portrayal of the supply from just the sites identified as allocations through the plan (Tables H1 & H2 in Chapter 16) and an annual completion from this source compared with the housing requirement (showing both the LHN as at April 2019 and the 920dpa). The supporting text (paragraph 4.78) is clear that other sources of supply, such as windfalls, Airport housing, any of the supply from the Defined Villages and so forth, is not included. It was the Council's intention that, as part of the annual Authority Monitoring Report (AMR)\textsuperscript{56}, the Housing Trajectory would be updated not only with the latest data from the monitoring year, but also to show additional details, including progress towards meeting the plan period housing requirement through a cumulative trajectory. For example, see the one prepared for the Housing Topic Paper\textsuperscript{57} and section 7.28 on page 127-129 which shows that the plan period’s 18,400 dwellings housing requirement is met by year 16 of the Plan (2030/31).

37. The trajectory in the Plan shows how the allocations will be taken up in earlier phases of the plan period, which is generally attributed to the majority of sites being small-medium in size (see response to Question 5.2c as well) and all sites being available now (or upon adoption of the plan), as there are no phasing policies or phased release of allocations in the plan (unlike the current Core Strategy\textsuperscript{58} Policy CS10 Part B).

38. Some representations have objected that the Plan does not contain enough allocations for the entire plan period, and that the housing target will not be being met towards the end of the Plan, based on the evidence of the trajectory in Figure 3\textsuperscript{59}. The important factor here is that the...

\textsuperscript{53} OTH1 Adopted Unitary Development Plan
\textsuperscript{54} SDEB27 Doncaster 5-Year Deliverable Housing Land Supply Statement 2019-2024 – page 6
\textsuperscript{55} Figure 3 on page 41 of CSD3 - Doncaster Local Plan 2015-2035 Regulation 19 Publication Version
\textsuperscript{56} Section 35 of the Planning and Compulsory Purchase Act 2004, as amended by section 113 Localism Act 2011, requires the Council to prepare an annual report providing information on the extent to which the policies set out in the Local Plan is being achieved.
\textsuperscript{57} DMBC4 Topic Paper 4: Housing 2020 – pages 127-129.
\textsuperscript{58} OTH3 Adopted Core Strategy Development Plan Document 2012 – Page 58
\textsuperscript{59} Figure 3 on page 41 of CSD3 - Doncaster Local Plan 2015-2035 Regulation 19 Publication Version
trajectory shows that the plan period requirement will be met, not just by the end of the plan period but before 2035 (by year 16 or by 2030/31). This will also see housing needs, including affordable housing need, being addressed sooner which is of course a positive strategy and approach to adopt in line with NPPF, in particular paragraphs 11, 20a, and 67.

39. That said, on reflection the Council feels that the current trajectory in Figure 3 of the Plan could be improved further to make the Plan more effective through additional detail and sources of supply in line with the Main Modifications suggested to the summary Table 5 of the policy and as per Question 5.4. The revised trajectory being as follows and, unlike the current trajectory in the Plan, supported by a new table of figures. There are also consequential amendments to the explanatory text at paragraph 4.78.
Figure 3: Local Plan Housing Trajectory (page 41 of the Local Plan)

Plan Period Housing Trajectory

- Windfall allowance of 200dpa
- Allocations Supply (Tables H2)
- Planning Permission Supply (Tables H1 + Supply from Defined Villages + Small Sites 1-4 Units)
- Net Completions (1st April 2015 - 31st March 2018)
- Local Plan Housing Requirement - Upper Range (920dpa)
- 5-Year Requirement (808dpa - 1st April 2019 - 31st March 2024)
- Local Housing Need Requirement - Bottom Range (553dpa as at 1st April 2019)
4.78 Figure 3 shows the housing trajectory for the plan period based on allocated supply through the Local Plan and is exclusive therefore of any as well as a supply from windfalls, supply from small permissioned sites across the borough, and any commitments at the Defined Villages as identified in the summary at Table 5. Nor it does it not however account for any housing in line with Policy 37 at the Airport.

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<td>758</td>
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<td>Windfall allowance (200dpa)</td>
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<td>5-Year Requirement (608dpa - 1st April 2019 - 31st March 2024)</td>
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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?

40. The Council believes the housing trajectory, Modified in line with the response to Question 5.10 above, demonstrates that the Plan will be effective in ensuring that there will be a supply of deliverable sites both upon adoption of the Plan, and thereafter. The revised trajectory shows the 5-year requirement (as at April 2019) and this will be reviewed throughout the plan period as per the Council’s responses to Matter 5, in particular setting the housing requirement as a range with the bottom of the range being the LHN and used for the purposes of calculating 5-YHLS.

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?

41. Yes. The Council considers that the approach set out in Local Plan (CSD3) Policy 2 part 5 is justified and consistent with national policy.

42. The Council considers it has prepared a positive and appropriate strategy for the distribution of assessed development needs together with policies to support development to deliver that strategy. A ‘settlement hierarchy’ is included to guide implementation of the strategy with policies specific to every level of the hierarchy from the largest urban settlements through to Countryside. The Council is satisfied that development proposals can be supported that meet the varying needs across the Borough in a manner that delivers sustainable development. This includes supporting appropriate rural development in the rural settlements and Countryside that supports a prosperous rural economy and which delivers rural housing. These issues are discussed in further detail elsewhere in 'Matter 3: Strategic Approach'.

43. Planning law is clear that applications for planning permission must be determined in accordance with the development plan (unless material considerations indicate otherwise). However, the planning system also operates on the basis of a presumption in favour of sustainable development. Whilst the Council fully expects to maintain an up-to-date Local Plan (based on a monitoring regime that will help to meet the statutory need to review whether it needs updating at least once every five years), it is also mindful that there are unforeseen events beyond its control which have the potential to impact on its ability to demonstrate a five-year borough-wide supply of housing. As the NPPF (OTH39) makes clear, the failure to demonstrate such supply has implications for decision taking including for housing proposals that may be promoted in locations which would otherwise be contrary to the Local Plan. This can lead to
speculative proposals beyond settlements and plan allocations in the countryside. In such situations decision taking has to balance the need to deliver housing against the need to seek to maintain the local development plan strategy for directing development to where it is most needed to deliver sustainable development. At its most extreme this can lead to 'planning by appeal'.

44. The second paragraph to Part 5 of Policy 2, including criteria A to E, has been specifically prepared to help guide decision making where a five-year borough-wide supply of housing land cannot be demonstrated. This does not subvert the requirements of the NPPF which will remain a material consideration in planning decisions (NPPF, paragraph 2). This policy is proposed in line with the presumption in favour of sustainable development requirements for plan making that plans should be sufficiently flexible to adapt to rapid change (NPPF, paragraph 11a). If adopted, it would act as an early mechanism to help enable a return to five year housing land supply in a planned way.

45. The Policy is proposed to only apply to Countryside where adjacent to the development limits of settlements in levels 1-3 of the Plan's Settlement Hierarchy. It would not apply to Defined Villages in the Countryside where it is proposed separate policy would continue to apply - see final paragraph to Part 5 of Policy 2. This is because the policy for Countryside adjacent to such villages already allows development (subject to set-out limitations); and further development here is realistically unlikely to be capable of making a significant contribution to rectifying any deficit in five-year housing land supply without respect their form and function based on their relative sustainability. The policy provision would also not apply to land adjacent to Defined Villages in the Green Belt where national Green Belt policy would continue to apply.

46. As stated in criterion E, this policy provision would also only apply to development which 'would make a significant positive contribution to housing land supply'. This is proposed to deter the considered likely harmful prospect of many small-scale individual development proposals being permitted in an ad-hoc manner which is more likely to cause harmful impact to the setting of settlements and lead to a gradual erosion of the Countryside in a manner unlikely to recognise the intrinsic character and beauty of the countryside.

47. As mentioned above and discussed in detailed in Matter 3, the Council has a Strategy and supporting policies which supports appropriate rural development in the rural settlements and Countryside. The Policy in Policy 2, part 5, does not require a lack of five year housing land supply to support development in the Countryside.