Matter 5. Housing Supply

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\(^2\)?

1. The HBF do not wish to comment on this question, at this time.

Overall supply for the Plan period 2015 to 2035

Table 5 in the Plan summarises the housing land supply. The Council’s Schedule of Minor Typographical and Cartographical Amendments\(^3\) suggests some changes to the figures. Based on those amendments, the supply for the Plan period 2015 to 2035 identified in Table 5 is as follows:

<table>
<thead>
<tr>
<th>Description</th>
<th>Quantity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Net completions 2015 to 2018</td>
<td>3,400</td>
</tr>
<tr>
<td>Expected completions on allocations with planning permission at 2018</td>
<td>9,289</td>
</tr>
<tr>
<td>(Tables H1 A-O in Chapter 16 of the Plan)</td>
<td></td>
</tr>
<tr>
<td>Expected completions on other commitments at 2018 not allocated in the Plan</td>
<td>585</td>
</tr>
<tr>
<td>(small sites and in Defined Villages)</td>
<td></td>
</tr>
<tr>
<td>Expected completions on allocations without planning permission</td>
<td>6,630</td>
</tr>
<tr>
<td>(Tables H2 A-Q in Chapter 16 of the Plan)</td>
<td></td>
</tr>
<tr>
<td>Total 2015 to 2035</td>
<td>19,904</td>
</tr>
</tbody>
</table>

Paragraph 4.77 in the Plan refers to some of the supply being capped. The Council’s response to PQ28 clarifies that the notion of capping was used to inform the distribution of allocations across the Borough and that there are no policies in the Plan that would prevent any of the supply being delivered during the Plan period.

The Council’s responses to PQ26 and PQ27 identify further sources of supply during the Plan period:

<table>
<thead>
<tr>
<th>Description</th>
<th>Quantity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Windfalls (200 per year 2018-2035)(^4)</td>
<td>3,400</td>
</tr>
<tr>
<td>Windfalls at Defined Villages (policies 2 and 3)</td>
<td>290</td>
</tr>
<tr>
<td>Windfalls on sites identified in the brownfield register 2019</td>
<td>197</td>
</tr>
<tr>
<td>Total windfalls</td>
<td>3,887</td>
</tr>
</tbody>
</table>

In total, the above would represent a supply of 23,791 dwellings between 2015 and 2035\(^5\). This compares to the strategic aim set out in policy 3 of delivering 18,400 new homes in that period.

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\(^1\) SDEB46.
\(^2\) NPPF section 5 and PPG ID:3 and ID:68.
\(^3\) CSD6.
\(^4\) Paragraph 4.83 of the Plan refers to windfalls averaging 419 per year 1999-2011 and 494 per year 2011-2015. The Council’s response to PQ26 refers to an anticipated supply of around 200 windfalls per year 2018-2035.
\(^5\) 19,904 + 3,887 = 23,791.
In addition, a total of 2,292 new homes are expected to be built on a number of allocations after 2035 due to the delivery trajectory for those particular large sites. However, there are no policies in the Plan that would prevent those being completed before 2035.

Policy 7 proposes the development of 280 new homes at Doncaster Sheffield Airport on allocated site 940E2 and potentially a further 920 on site 940E3 dependent on job growth. Paragraph 5.4 of the Plan states that the airport is an economic priority both for Doncaster and Sheffield City Region and it will play a key role in driving the local and regional economy. The strategic aim of delivering 18,400 new homes is in part to accommodate additional household growth to meet the Council and City Region’s growth ambitions. Despite this, paragraph 4.78 advises that none of these 1,200 dwellings are accounted for in the housing land supply and the Council’s response to PQ27 confirms that any completions on the allocated sites at the airport would not be counted towards achieving the aim of delivering 18,400 new homes.

“Reserve sites” identified in the Plan have potential capacity to accommodate 1,438 new homes. However, paragraph 4.82 of the Plan states that, due to HS2 and flood risk, there is doubt about whether they could be developed in the Plan period meaning that they have not been factored into housing supply.

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?

2. The HBF do not wish to comment on this question, at this time.

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?

3. Due to the uncertainty around the developability of these sites, the HBF support the Council in not including them within the supply. If these sites do come forward, they can be considered to add flexibility and choice to the supply.

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?

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8 Paragraphs 4.37 and 4.38 of the Plan and SDEB44 paragraph 2.20 to 2.40.
4. It may add clarity to the policy if further information is provided to set out the total housing supply for the plan period.

**Small and medium sized sites**

NPPF 68 requires local planning authorities to identify through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare (unless it can be shown that there are strong reasons why this 10% target cannot be achieved). Paragraph 4.81 of the Plan indicates that 8% of the requirement may be met on such sites. However, the Council’s response to PQ31 advises that further sites have been identified in the brownfield register 2019, meaning that now there are opportunities to build a total of 2,320 dwellings on small and medium sized sites. This represents nearly 13% of the requirement for 18,400 over the Plan period.

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?

5. The HBF consider that it is important that the Council provide an appropriate range and variety of sites to support the delivery of homes, it is important that this includes at least 10% on sites no larger than 1ha. The HBF considers that the modified paragraph 4.81 is an improvement on the existing text, however, there would have been more certainty if these small sites had been included as allocations in the Plan.

**Five year housing land requirement**

National guidance advises that housing requirement figures in adopted strategic policies should be used for calculating the five year housing land supply figure. Where strategic policy-makers have successfully argued through plan-making and examination for a requirement set out as a range, the five year land supply will be measured against the lower end of the range. Where the requirement is set out as a range, the five year land supply will be measured against the lower end of the range.

Policy 3 states that for the purposes of calculating five year housing land supply, the requirement will be based on the local housing need figure as derived from the standard method reviewed and revised through the plan period in line with the latest household projections and affordability ratio.

The Council’s response to PQ23 suggests that the use of a fixed figure as the bottom of the range would mean that the Plan would date very quickly which they consider would be unhelpful. The Council also considers that the Government’s standard method for calculating local housing need may change, and that variable figures are a common feature of the planning system.

The Council’s response to PQ21 states that the housing requirement for the Plan period is the range 11,700 (20 x 585) to 18,400 (20 x 920). If the five year requirement were based on

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7 PPG ID:68-005 and 027-20190722.
the bottom of that range and no account were taken of completions since 2015 it would be 3,218 dwellings\(^8\). This includes a 10% buffer as required by national policy\(^9\).

The Council’s response to PQ25 states that the five year requirement on 1 April 2019 would be 3,042 dwellings if it were calculated as proposed in policy 3 ie based on the latest local housing need figure under the standard method\(^10\). If it were based on 920 dwellings per year and it took account of completions since 2015, the five year requirement would be 4,703 dwellings\(^11\). If it were based on 920 dwellings per year and it took no account of completions since 2015, the five-year requirement would be 5,060 dwellings\(^12\).

**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?**

6. The HBF do not consider that having a variable figure, or using just the figure from the standard methodology which is not considered to meet the full need, is particularly effective in helping to ensure that the need for homes can be met.

7. The NPPF\(^13\) looks for local planning authorities to identify a minimum of five years’ worth of housing against their **housing requirement set out in adopted strategic policies or** against their local housing need where the strategic policies are more than five years old. This appears to suggest that the housing requirement would be one number rather than a range and that it should be different to the local housing need.

8. The HBF consider that a clear housing requirement should be set, using the standard method as a starting point and taking account of the need for a higher figure based on the evidence provided by the Council. This figure should be identified as a minimum net figure, the HBF consider this would add clarity to the policy. This housing requirement figure would then be used to calculate the five-year housing land supply.

9. If the 920dpa were to be taken as the net minimum housing figure, the HBF considers that the five-year housing land requirement would be 5,060\(^14\), including the 10% buffer.

**Five-year housing land supply**

The Council’s Five-Year Deliverable Housing Land Supply Statement 2019-2024\(^15\) identifies total capacity of 6,870 dwellings on sites considered to be deliverable on 1 April 2019. The Council’s response to PQ29 advises that the figure should actually be 7,518 dwellings because the figure in SDEB27 was based on a typographical error. This includes a 10% buffer.

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\(^8\) 585 x 5 = 2,925. 2,925 + 293 (10%) = 3,218.

\(^9\) NPPF 73(b).

\(^10\) 553 x 5 = 2,765. 2,765 + 277 (10%) = 3,042.

\(^11\) 18,400 – 4,727 = 13,673. 13,673 / 16 = 855. 855 x 5 = 4,275. 4,275 + 428 (10%) = 4,703.

\(^12\) 920 x 5 = 4,600. 4,600 + 460 (10%) = 5,060.

\(^13\) Paragraph 73

\(^14\) 920 x 5 = 4,600. 10% buffer = 4,600 x 10% = 460. Five-year requirement = 4,600 + 460 = 5,060.

\(^15\) SDEB27.
non-delivery allowance / lapse rate for all sites with or without planning permission (other than those under construction).

The Council’s response to PQ29 breaks down the total five year supply of 7,518 dwellings on 1 April 2019 into five categories consistent with those referred to in the NPPF definition of “deliverable” and windfalls:

A. Sites of <10 dwellings with outline or full planning permission 707
B. Sites of 10 or more dwellings with detailed planning permission 2,978
C. Sites of 10 or more dwellings with outline planning permission (8 sites) 1,183
D. Sites with a grant of planning permission in principle (8 sites) 119
E. Allocations without planning permission (27 sites) 1,531
F. Windfalls 1,000
Total 7,518

National policy advises that sites in categories A and B (total 3,685 dwellings) should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

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?
10. The HBF do not wish to comment on this question, at this time.

The Council’s response to PQ30 summarises its evidence for the assumptions about the number of dwellings expected to be delivered within five years on each of the sites that fall into the other categories C, D and E (total 2,833 dwellings). The full evidence is set out in the Five Year Deliverable Housing Land Supply Statement 2019-2024; Housing & Economic Land Availability Assessment 2018; and Topic Paper 4: Housing16.

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?
11. The HBF does not wish to comment on any of the individual sites, however, the PPG provides clear examples of the types of evidence that may be used to demonstrate deliverability these include:

- How much progress has been made towards approving reserved matters, and whether these link to a planning performance agreement (PPA) that sets out the timescales for approval of reserved matters and discharge of conditions;
- Firm progress towards the submission of an application;
- A written agreement which confirms the developers’ delivery intentions and anticipated start and build-out rates;
- Firm progress with site assessment work;

16 SDEB27; SDEB45; and DMBC4.
• Clear information about site viability, ownership constraints, infrastructure provision.

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?

12. The HBF do not support the inclusion of a windfall allowance with the five-year supply. The NPPF\textsuperscript{17} and the PPG\textsuperscript{18} are both clear that the 5-year land supply is a supply of \textbf{specific deliverable} sites. The use of ‘specific’ suggests that the sites should be clearly defined or identified, this does not appear to sit comfortably with the inclusion of windfall development. It is also not clear what evidence the Council can provide to demonstrate the deliverability of these windfall sites, given by their nature they are unidentified at this point.

13. If a windfall allowance were to be included, the HBF do not consider it would be appropriate to be included in the first three years of the supply, where it is likely to overlap with sites already identified with permissions. It will also be important that the Council provide appropriate compelling evidence as required by the NPPF\textsuperscript{19} and PPG\textsuperscript{20}, including historic windfall delivery and expected future trends.

\textbf{Housing trajectory}

\textit{Strategic policies in local plans should include a trajectory illustrating the expected rate of housing delivery over the plan period\textsuperscript{21}.}

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

14. The HBF do not wish to comment on this question, at this time.

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?

15. Assuming that the homes are delivered at the rates suggested by the trajectory it is not clear how the Council will ensure that they have a rolling five-year housing land supply especially in the later years of the Plan. It is assumed that the Council will monitor this and ensure that an appropriate action is set as part of the monitoring framework and as part of their 5-year review process, to make sure that further sites are brought forward if needed.

\textbf{Policy 2 part 5: if a five-year supply cannot be demonstrated}

\textit{Policy 2 part 5 states that, if a five year borough-wide supply of housing land cannot be demonstrated, residential development will be allowed in the Countryside if adjacent to a}

\textsuperscript{17} NPPF Paragraph 67
\textsuperscript{18} PPG ID: 68-002-20190722
\textsuperscript{19} NPPF Paragraph 70
\textsuperscript{20} PPG ID: 3-023-20190722
\textsuperscript{21} NPPF 73.
Development Limit of a settlement in levels 1-3 of the hierarchy provided that a number of criteria are met.

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?

16. The HBF do not wish to comment on this question, at this time.